

TO: U.S. Office of Management and Budget (OMB)

FROM: Missouri Office of Refugee Administration (MO-ORA); Paul Costigan, MO State Refugee Coordinator

RE: Comments on Notice Titled 'Submissions for OMB Review; Refugee Data Submission System for Formula Funds Allocations (ORR-5) (OMB #0970-0043), published in the Federal Register 11/04/2020

DATE: December 1, 2020

Following are Missouri Office of Refugee Administration's comments in regard to the Notice titled 'Submission for OMB Review; Refugee Data Submission System for Formula Funds Allocations (ORR-5) (OMB #0970-0043), published in the Federal Register November 4, 2020. Comments are broken down into the categories requested on the original Notice published July 8, 2020.

a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.

The Missouri Office of Refugee Administration (MO-ORA) agrees some of the information, already being captured, has practical use. MO-ORA has used the information collected from this report to assist in determining the funding levels of subrecipients (in this case, local refugee resettlement agencies) for various programs. Since MO-ORA became the Replacement Designee (RD) in Missouri in May 2018, we will be reviewing additional data contained in this report to assist in determining benchmarks and other performance measures that may be helpful in assisting refugees in becoming self-reliant.

Self-reliance is seen as a key to a successful program; not just finding employment, but also the means to continue further on the journey to a hopeful and successful future in a refugee's new community. Our goal, and we believe, ORR's goal, is to show that refugee families increase their self-sufficiency in various categories (measured from 'in crisis' to 'thriving') representing standard needs that are easily identifiable. The categories MO-ORA looks at in the Family Self-Sufficiency Plan (FSSP) assessment specifically are housing, food, physical health, mental health, employment, English language, transit, childcare and life skills. These categories are scored and reviewed within thirty days of the initial intake, then follow-ups at 90, 180, 240 and 365 days. The sum of the scored results is expected to increase, or show improvement, at each subsequent follow-up. This also allows for some flexibility, as the FSSP should be a living document, being tracked, updated, and adjusted as needed to reflect the needs of our diverse clientele. Our goal is to show a more holistic approach to self-sufficiency, not limited to only employment as a measurement.

Instead, the proposed data collection focuses on the initial primary goal, its subsequent referral, and employment information. The primary goal as a focal point directly diverges from the idea of an FSSP that is adaptable, based on client needs. As many case managers would note, what originally may be thought to be the primary goal changes as the client becomes more knowledgeable about U.S. culture and develops a relationship with their case manager. Also, since the 12-month follow-up is related to the primary goal and focuses on employment, it appears the primary goal is in reality expected to be immediate employment. This part in

particular offers **no** practical utility in shaping our program(s) and/or providing substantive information that will assist in working with the clients or reporting performance measures.

One of the stated goals for clients, other than employment attainment, is employment retainment. RSS clientele may be individuals who went through Missouri's RSS program or another state's upon their initial arrival, but now want to enroll in the program again to help retain their current employment, or further their skills to seek better employment opportunities. Again, which is the initial primary goal? And do states again follow-up as described for clients cycling through an agency once again?

b) The accuracy of the agency's estimate of the burden of the proposed collection of information.

ORR provides a revised annual burden estimate of 140 hours for each state. This is a gross understatement. And that is if changes can be made to MO-ORA's existing state-wide database in a somewhat timely matter. Databases and reporting formats have to be upgraded by October 1, 2020 in order to gather complete data for the intended FY 2022 Submission, which by its phrasing is misleading. The FY 2022 Submission noted in the original instructions obtained through request is for FY 2021 data (for Sections I and II), which means the systems to collect the data need to be available and operational October 1, 2020, to cover data from October 1, 2020 through September 30, 2021. These dates are still in alignment with the Supplementary Information contained in the current Federal Register posting. We are already past the start date of having to collect data for this report, without being able to make needed changes to a database to collect the required data.

MO-ORA will have to re-configure reporting to group individuals by household, thereby making it harder to provide the intense quality control we use to assure non-duplication and correct data. Our intense analysis of compiled data for Missouri's FY 2019 ORR-5 led our state to only have 12 submitted records out of 2,598 (.004%) not found on any Federal record. This analysis annually takes MO-ORA staff approximately 31 hours; this does not include the time it takes for the local refugee resettlement agencies to collect and review their data. Even going to a state-wide database will not reduce this effort, as MO-ORA also utilizes providers that may have data outside of the database.

There will need to be multiple changes to our database, plus changes to our reporting mechanisms. Some of the requested changes, the time it would take to make changes, and on-going issues are as follows:

1) Columns 2 and 3 – Primary Applicant (PA) Alien Number and Relationship to PA –

Currently we identify the Primary Applicant as the person applying for the service(s), and it does not necessarily follow the same definition of Primary Applicant bestowed on a refugee family grouping by the Department of State (DOS). And these same originally identified groups through DOS may split and be seen by our state as Secondary Migrants, whose records defining who is primary is not privy to our state (or other agencies within our state that may not have originally accepted an arriving family), and may not be relevant if the family has been split up. Also, those with status other than refugee will not have a DOS designation as Primary Applicant, making the designation by a state an inconsistent and

somewhat arbitrary designation. States would be able to match up much of DOS designations if the former monthly report received from the Bureau to Population, Refugee and Migration were still being published to the extent it was a few years back, but as that information is no longer available, the state's ability to perform quality assurance on this data point is nil.

The 'Relationship to PA' allowable designations are very limiting. Instead of defining son and/or daughter, the term 'child' is the defined option. So, if the PA is an elder (Grandparent), who has grandchildren in the family grouping, the term 'child' for the grandparent's adult child is misleading. Databases are set up to clearly identify relationship to assist in determining eligibility for other programs and areas of needs/barriers/goals that may arise. If a state has to conform to the statuses listed in the ORR spreadsheet, additional work and effort will need to be made to equate various relationships within larger defined relationships, causing more room for error and more need to validate data.

- 2) **Column 7 – Secondary Last Name** – (3 hours database set-up, 12 hours review of current entries, 4 hours of annual quality control = approximately 9 hours annual). This is information not collected at this time and generally thought to be a useless endeavor. 1) No other funder requests information broken down in this manner. 2) This has the potential to cause more problems, as names for individuals are not broken down on official documentation in this manner, leading staff to make their own judgment calls in many instances, again leading to more errors. 3) Data already entered in the standard First/Middle/Last Name fields would have to be reviewed to fit into this new collection methodology. Due to the multiple issues related to this column, we would not change our database to accommodate collection of this information and would leave this column blank. **NOTE:** We have been informally notified that this change was eliminated from consideration, but wish to continue to stress the time and effort this requires, as nothing formally has been noted in the Federal Register announcement or in any other format.

- 3) **Columns 12 and 13 – Nationality and Ethnicity** – (97.3 hours database set-up = 32.4 hours annual; MRD would also have approximately the same time expenditures = 32.4 hours annual). There are 272 Nationalities supplied by ORR, and 359 Ethnicities (Ethnicities is a new mandatory field for the ORR-5). In the state-wide database, MO-ORA will have to review each nationality, and enter their potential ethnicities (only ones from the list supplied by ORR) within that nationality into a spreadsheet, then add to the database, allowing for only the ethnicities within the nationality to appear. A trial run was done to determine the amount of time allotted for research, spreadsheet entry, database training site entry and review, testing and entry into the production site. 27.2 hours would be saved if a listing was supplied that already showed the allowable ethnicities for each nationality. This is extremely time consuming. It has also been determined that:

- Approximately 11% of the Nationalities listed are places with either no population (reefs, atolls, etc.) or only have a military and/or research presence – these 'nationalities' should not be present in a database. In an amended spreadsheet viewed by the state, these non-nationalities are still listed as viable.

- Many of the nationalities have known ethnicities that are not on the list. MO-ORA would either have to list them, then convert the ethnicity to 'Other' for the ORR-5 listing to be accepted by RADS, or just not include the other known ethnicities as options in our database. Example: The ethnicity 'Baloch' is not included for the nationality of 'Afghanistan.'
- The Ethnicities listing provided by ORR is confusing. Some have multiple listings in one cell (example: Buduma, Boudouma, Yedina), and it is unknown whether these should be considered as separate optional entries or included as a 'group.'
- The spelling of the Ethnicities differs, some appear to be singular and some plural, and some have multiple spellings (ex: Fulani, Fullah – could also be Fula or Fallata, Fallatah, or Fellata – all three not listed; and Fulbe also listed, is the same, but plural of the other listings identifying the same ethnicity).
- The Medical Replacement Designee (MRD) also reports their information to MO-ORA for inclusion on the ORR-5. Their database would also need to be adjusted for this report, and our search criteria would need to match up to ensure a degree of validity.

An additional concern is nationalities that are already collected in our current database, and not linked to an ethnicity, which is a current non-mandatory field still in development.

NOTE: We have been informally notified that this change was eliminated from consideration, but wish to continue to stress the time and effort this requires, as nothing formally has been noted in the Federal Register announcement or in any other format.

- 4) **Column 25 – RSS FSSP Initial Primary Goal (G1)** – (100 hours database set-up = 33.3 hours annual). MO-ORA will have to change some of the listed barriers within the current database and are reluctant to eliminate some of the listed potential barriers already in place. Also, a designation would have to be put in place to label a goal as primary initial RSS goal. This could be both a training issue/concern as well as rife for incorrect usage, as the database system is set up for multiple program use (such as Matching Grant, Reception and Placement, Refugee Cash Assistance, Preferred Communities, Services to Older Refugees and Youth Mentoring), and each of those programs may have similar goals or goals that may conflict with the designated RSS primary goal.

As noted previously, the primary goal as a focal point directly diverges from the idea of an FSSP that is adaptable, based on client needs. As many case managers would note, what may originally be thought to be the primary goal changes as the client becomes more knowledgeable with the U.S. and develops a relationship with their case manager. Also, since the 12-month follow-up is related to the primary goal and focuses on employment, it appears the primary goal is in reality expected to be immediate employment.

- 5) **Column 26 – RSS FSSP Initial Referral Relevant to G1** – (100 hours database set-up = 33.3 hours annual; on-going quality assurance = 30 hours annual). MO-ORA will have to provide direct links from the establishment of an Initial Goal to a Referral Notice, generated automatically when a G1 is created. This will require additional work to ensure other auto-links are not created for other/additional client goals not designated at G1. Also, MO-ORA needs to be able to create an edit, for those goals/referrals incorrectly labeled or changed

during further interactions with the client. Testing on this will need to be extensive, to ensure correct data is being entered on a manual basis and collected correctly in the data reports.

Additionally, technicians have concerns about the data reliability, requiring additional lay hours to review for quality and accuracy.

- 6) **Columns 27 and 28 – RSS FSSP English Ability and Education Level** – (100 hours database set-up = 33.3 hours annual; on-going quality assurance = 30 hours annual). The database set-up would take minimal hours normally, but the options listed by ORR to be included in these categories are outside of and more intensive than those already collected by MO-ORA, as well as other programs the local resettlement agencies may have and report within the database adopted by MO-ORA. No other program reports use the options listed under these categories. This would cause our programmers to have to determine ‘equivalencies’ to the options listed, and group them together accordingly in the reporting environment, causing errors and continued quality assurance as to the validity of the information.
- 7) **Columns 29-30 – RADS Assigned Case and Individual ID Numbers** – (minimal hours 120 hours database set-up = 40 hours annual; performing quality inspection of data yearly for submission = 35 hours annual for MO-ORA, 45 hours annual for the subrecipients). Per the instructions, these ID numbers are created by RADS, assigned to individuals who completed an FSSP Assessment the previous year, and are used to track the employment status of these individuals. Using this information, and the Alien Number supplied by RADS, MO-ORA is expected to report on these individuals. Additional fields may/may not have to be created in the MO-ORA database to input the RADS Case and Individual ID numbers for the appropriate clients, and/or create and utilize some other additional fields that allow technicians to pull a report that lists just the individuals in question. Creation of such a report, in conjunction with additional information discussed regarding the next columns, is expected to be improbable, if not actually impossible, requiring manual reviews for each person identified in the required report.
- 8) **Column 32 – RSS FSSP Initial Primary Goal Met?** – (minimal 15 hours database set-up = 5 hours annual; on-going quality assurance = 30 hours annual). MO-ORA may have grossly underestimated tracking of the status of the initial primary goal, but this column builds up on the development of the Primary Initial Goal. The main database development will be in the area of follow-up, as goals and action steps do not have built in standardized follow-up outside of the expected date of completion of accompanying action steps.
- 9) **Columns 33-36 – RSS FSSP Employment Data** – (minimal 36 hours database set-up = 12 hours annual; 56 hours to build a report to capture just the information required in these columns, including testing = 19 hours annual; quality assurance = 30 hours annual). The stratified data and the complexity required for these columns will take additional database report building, separate from the other sections of this report. The individual reports will have to be migrated into one report, then reviewed for duplicate entries and inconsistencies.

10) **Column 37 – How was 12-month information collected?** – (minimal 60 hours database set-up = 20 hours annual; quality assurance = 30 hours annual). MO-ORA is unsure whether this information can be determined through our database system, or if an individual manual review must be conducted for each client. MO-ORA feels this is an unnecessary component of the report and may be considered subjective, especially if each client's information must be reviewed manually for adherence.

11) **Additional Concerns –**

- This one report carries an abundance of information required on an individual and family level. Creating a report to secure the information out of a database system has too many variables and drawing all into one database report appears to be an onerous task. MO-ORA would have to break down the report in sections by individual/family grouping, then migrate the reports together through a tedious manual process. The 31 hours annually it generally takes MO-ORA to compile the report will undoubtedly take even more time. Plus, Missouri's refugee resettlement agencies will also have to compile and review their separate reports, prior to MO-ORA collecting the state-wide data, entailing approximately 100 hours annually (estimated 20 hours per agency).
- The intensive individual demographic and employment data may be used to single out various age groups, ethnic groups or nationalities that are higher and/or lower performing, affecting refugee resettlement based on performance indicators whose validation will be suspect for several years while MO-ORA and other states are trying to improve the quality of their database and reporting.
- Staff training will have to be performed frequently, as it is imperative that information is entered correctly into the database to assure validity.

Given just these basic needs to provide the proposed data in a concise and reliable manner, the total estimate of hours/burden for the first three years is 598.3 hours annually, a far cry from the proposed 42 annual hours provided by ORR in the Federal Register. While some of these hours will not continue to be reflective of the burden past the initial three years (initial set-up equals total 214.3 hours annually over three years), continued quality control, merging data, and finalizing the report structure will take a minimum of 384 hours annually.

c) **The quality, utility, and clarity of the information to be collected.**

MO-ORA is implementing full use of our state-wide database system starting FFY 2020. The system was created to be used for multiple programs and funders, most requiring the information in the same basic formatting. This assists in alleviating some of the double/triple/multiple data entry systems used for various programs, allowing the efficient use of one system to collect, organize and report data in a structure that reports information consistently.

Some of the requested information to be contained and/or collected in this report are not needed for the ORR-6, are not used for other programs, and if required, serve MO-ORA no

purpose and allow for multiple errors to be generated. In particular, the 'Second Last Name' and 'Ethnicity' fields are not necessary and will cause errors in- and outside of this report. Changes to existing systems, both digital and manual, would be extensive, and the cost in time and effort to collect data in a format not used by other programs (i.e.: education levels, English levels) would amount to negligent fiscal stewardship. The RD in Missouri prides itself on solid fiscal stewardship of taxpayer dollars.

d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

MO-ORA has implemented a state-wide database, specifically for the purposes of collecting consistent and comparable data required for MO-ORA's ORR reporting needs. The database may also be used by agencies for collecting data outside MO-ORA needs, such as Reception and Placement, Preferred Communities and other programs/grants the resettlement agencies may have. This database, while conducive to collecting ORR data, must be structured in such a way as to be useful on a macro level. Some of the changes required in the restructuring suggestions for the ORR-5 do not allow for this. MO-ORA feels it is irresponsible to make adjustments to any system that impacts its usability or causes additional unnecessary work, especially for front-line staff, which is what some of these suggested changes do. (Examples: Primary goals, second last name, multiple job reports, ethnicities – some of which are not included in the listing supplied for the Federal Register.)

Automated collection techniques are only as good as the data being inputted. The auto-report for the requirements of the ORR-5 is too detailed to be done in one report, requiring multiple reports to be run, spliced together, then run for duplication concerns, then again migrated into a row format to include each individual's information, within the family structure. Essentially, regardless of automation, extensive manual review of the information for both quality control and additional information supplied by agencies outside of the MO-ORA database will be required. This then defeats the purpose of having a comprehensive database which was to offer ease of use by the user, clear reporting and ensuring the data output is of the highest quality.

	Total Burden Hours	Annual Burden Hours
Estimated time to make system changes for Proposed ORR-5	1,364 (3-year time frame)	598.3 hours annually
Current time	131 hours annually	131 hours annually