



DEPARTMENT OF ECONOMIC SECURITY

*Your Partner For A Stronger Arizona*

Douglas A. Ducey  
Governor

Michael Wisehart  
Director

November 30, 2020

Administration for Children and Families  
Office of Planning, Research and Evaluation  
330 C Street SW  
Washington DC 20201

Attention: ACF Reports Clearance Officer

**Re: Federal Register Notice**

Please accept this as the Arizona Refugee Resettlement Program's (RRP) response to the November 4, 2020, wherein, the Office of Refugee Resettlement (ORR), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), is proposing to extend approval for data collection using the current Refugee Data Submission System for Formula Funds Allocations (ORR-5) until January 31, 2021, and revise the current form for use after Fiscal Year (FY) 2020. The revised form will collect additional client-level data.

Section I

Data Point Two Primary Applicant: The Arizona Refugee Resettlement Program (RRP) Does not track Primary Applicant in our database as it has not been a requirement of ORR funded services up to this point. The data could be inferred from the Bureau of Population Refugees and Migration (PRM) cases, however it would give an non-accurate picture of each case. RRP often sees family units split or join thus differing from the PRM designation. To implement this requirement RRP would require additional information on how Primary Applicant should be designated in these circumstances.

Section II

Data point Three Initial Primary Goal: RRP would not be able to ascertain what the client's primary goal for service is. In practice, workers have difficulty having clients define and put forth their goals. To ask clients to identify their primary barrier may prove to be a practical impossibility. Case workers could help to assign the "G1" tag to a goal, but it would most likely be left to the discretion of the case worker which is antagonistic to RRP's practices of centering client agency in their plan development.

To implement this data point RRP would advise ORR to create a more precise definition of what "G1" would entail such that it can be ascertained through post action data analysis. Examples could be that a "G1" goal is the goal with the most constitution action items or is the under which employment is predicated. Without a more specific definition it is feared that the field "Unable to provide information" may become the default response and invalidate the usefulness of the field.

### Section III

Data Point Ten: As RRP has operated the Arizona Refugee Resettlement Program Online Database (ARRPODS) over the past four years data has demonstrated that clients rarely if ever are served past one year from date of US entry or grant of qualifying status. As RRP has collected and analyzed data we have concluded that we must further enforce the priority provisions of Services Clause under 45 CFR § 400.147 under new contracts that will be released in Federal Fiscal Year 2022. It is anticipated that available Refugee Support Services (RSS) funding will only be sufficient to serve clients under the first and second priorities should the arrival number rise under the new administration. Thus, it is likely that “Unable to provide information” will become the default field as caseworkers will be tasked with working on new arrivals and those on federal cash assistance, neither of which extend beyond 12 months in Arizona.

To provide this data point it is advised that ORR release a policy letter dictating that the 12 month check procedure take precedence over 45 CFR § 400.147. If that is not possible it would be advisable to add another data point indicating which priority each client falls under such that “unable to provide information” data point could be juxtaposed against the priority level to tell the story as to why these clients could not be contacted.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Shipman". The signature is fluid and cursive, with the first name "Charles" being more prominent than the last name "Shipman".

Charles Shipman  
State Refugee Coordinator