



MIGRATION AND REFUGEE SERVICES

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September 15, 2023

Re: Proposed Information Collection Activity; Voluntary Agencies Matching Grant Program Data Reporting (New Collection), 88 Fed. Reg. 46169 (July 19, 2023)

To Whom It May Concern:

During the past few years, federal funders have partnered with refugee resettlement agencies (RAs) to serve large influxes of unanticipated Afghans, Ukrainians, Cubans, and Haitians alongside historic growth in the U.S. Refugee Admissions Program. In Fiscal Year (FY) 2024, the number of refugees resettled in the United States is expected to double, stretching RAs further as we try to meet strict government requirements, while also balancing growing administrative and programmatic capacity. To achieve this shared goal of doubling the number of refugees resettled, it is crucial that government agencies and implementing partners come together to identify administrative inefficiencies that could prevent RAs from achieving sustainable growth and providing quality services. The State Department's Bureau of Population, Refugees, and Migration (PRM) has acknowledged this need and is currently working with state refugee coordinators and national RAs on a strategic planning process to reduce administrative inefficiencies that are limiting local capacity. Thus far, the Department of Health and Human Services' Office of Refugee Resettlement (ORR) has not engaged in a similar effort and has instead chosen to implement additional data collection requirements that increase the administrative burden on national RAs and their local partners.

Given these considerations, the U.S. Conference of Catholic Bishops' Department of Migration and Refugee Services (USCCB/MRS) welcomes the opportunity to respond to ORR's proposed information collection activity for the Matching Grant (MG) Program. USCCB/MRS' comments revolve around 1) inefficiencies and data accuracy concerns tied to monthly data reporting and 2) ORR's proposed timeline for implementation of the revised data points, as outlined below.

1) Monthly Data Reporting

Over the past fiscal year, USCCB/MRS has witnessed a transition in ORR's approach to data collection for the Preferred Communities (PC) Program and now the MG Program as well. Despite long-established data collection practices that require individual client records to be submitted to ORR on a biannual basis, ORR will now require monthly data uploads. This new approach both strains capacity and undermines data accuracy. While USCCB/MRS values data-informed decision making, USCCB/MRS staff are feeling the strain of managing two databases at once: one for USCCB/MRS and our local affiliates and a second database for ORR.

USCCB/MRS supports the collection of the additional data points that have been proposed in this notice. These revisions will provide comprehensive data that both USCCB/MRS and ORR can use to advocate for more streamlined services. That said, the requirement for monthly data uploads is

an inefficient use of staff time and resources. Monthly data reporting will not grant ORR the equivalent of live data. Instead, it will create increased reporting errors and data discrepancies. Biannual reporting supplies ORR with more accurate data without unnecessarily burdening RAs and their local partners.

The sections below outline USCCB/MRS' burden hours estimate for monthly reporting.

a) Average Burden Hours Per Response

In its *Federal Register* notice, ORR has estimated roughly 16 burden hours (2 full working days) per monthly response. Using our experience with PC data reporting, USCCB/MRS estimates it takes roughly 75 minutes to upload 100 records into ORR's Refugee Arrivals Data System (RADS) database. This is due to data cleaning and formatting requirements applied to USCCB/MRS records before final submission in RADS is possible. Using FY 2022, the most recently completed MG fiscal year, we can estimate the time burden for MG monthly uploads.

	Enrollment Records	180 Day Records	240 Day Records	Total Monthly Records	Monthly Burden Hours (75 min per 100 records)
October	434	53	584	1,071	13.4
November	1,016	138	383	1,537	19.2
December	1,326	170	295	1,791	22.4
January	849	158	417	1,424	17.8
February	721	273	323	1,317	16.5
March	508	438	462	1,408	17.6
April	303	886	407	1,596	20.0
May	355	1,245	506	2,106	26.3
June	337	627	357	1,321	16.5
July	375	899	345	1,619	20.2
August	388	616	424	1,428	17.9
September	507	369	441	1,317	16.5
Annual Total	7,119	5,872	4,944	17,935	224.2

In FY 2022, USCCB/MRS processed an average of 1,495 MG records per month (this includes enrollments, 180-day reports, and 240-day reports).¹ Using the 75 minutes per 100 records estimate, this translates to an average of 18.6 hours per month for MG data uploads. While this estimate is only 2.6 hours higher than the 16-hour burden estimate ORR has calculated, it does not take into consideration the impending increase in refugee arrivals in FY 2024. In FY 2024, USCCB/MRS expects MG enrollments to grow in alignment with Reception and Placement (R&P) arrivals, which are expected to increase by 100%. If we are conservative and estimate MG

¹ USCCB/MRS' monthly average for MG record submission in FY 2023 to date is within 5% of the average for FY 2022.

enrollments to increase by 60%, rather than 100%, this would result in roughly 29.8 hours per month (almost four days) spent uploading MG data to RADS. Unfortunately, unlike other tasks where an economy of scale might create efficiencies, data uploads do not follow this trend. In fact, USCCB/MRS PC staff have begun uploading monthly enrollments in smaller batches to more easily identify the records that are being returned by RADS for data cleaning/formatting.

b) Additional Administrative Burden Considerations and Data Accuracy

While the average burden hours per response estimate takes into consideration each monthly upload, this estimate does not include time spent on quality assurance and data reconciliation when records are updated, split, or removed. Historically, national RAs have maintained their own databases and have been responsible for the quality assurance and data management tasks necessary to ensure accurate external reporting to ORR on a biannual basis. Reporting on a biannual basis reduces the presence of data discrepancies caused by revised reporting and general data cleanup. During the life of a Matching Grant case, case records are occasionally split, typos are corrected, missing data points (including newly issued A-Numbers) are assigned, and self-sufficiency status determinations are reviewed and revised. Because changes to case records are reflected live in USCCB/MRS' database but not in RADS, this continuous data cleanup effort results in discrepancies between records in the two databases. During each biannual reporting period, USCCB/MRS works with the RADS team to communicate any revisions that may have taken place. This ensures RADS records match what is present in USCCB/MRS' database. ORR's request for national RAs to upload data in monthly increments creates additional opportunities for data to become misaligned. Without the necessary mechanisms to identify misaligned data, the reconciliation process will become far more time intensive.

Since the start of FY 2023 and ORR's transition to monthly data reporting for PC grants, RADS has relied heavily on the database itself to return records with formatting errors. In this new process, the RADS team is not actively engaging with the RAs to assist with data reconciliation for case records that may have been amended since they were originally submitted. With ORR's move to a more continuous form of data reporting, the onus is being placed on national RA staff to maintain both databases. USCCB/MRS' database has a selection of custom reports that assist us with quality assurance and data cleanup; however, to date, the RADS system does not allow data analysis or quality assurance to take place. RAs cannot run any quality assurance reports, nor can RAs export data from RADS to cross check with local records.

In addition to the time spent completing monthly data uploads, USCCB/MRS anticipates significant time will be spent reconciling data discrepancies between RADS and USCCB/MRS' database. Because there is currently no way for national RAs to conduct this kind of quality assurance in the database itself (e.g., with custom quality assurance reports), USCCB/MRS has to assume we will continue to complete biannual data reconciliation activities with the RADS team. Using USCCB/MRS' experience with biannual MG data reconciliation, we would add a minimum of 24 hours (3 days) per biannual reporting period to the burden estimate. This brings the annual

burden hours for monthly uploads to 406, an increase of 111% from ORR’s estimate of 192 hours per year.

2) Timeline for Data System Updates

During a call with ORR on August 18, 2023, it was communicated that national RAs should expect to begin reporting these added data points in the first biannual Program Progress Report (PPR) of FY 2024. Because PPR1 covers all cases that were enrolled, reached day 180, or reached day 240 between October 1, 2023, and March 31, 2024, this would mean national RAs would need to have their databases updated and collecting these new data points by October 1, 2023. USCCB/MRS would like to join the other national RAs in communicating that this implementation timeline is not possible. USCCB/MRS’ developers require a minimum of six months to make these changes before we can begin collecting the required data. The six-month clock should start only once the data points have been finalized and approved by the Office of Management and Budget. USCCB/MRS’ database developers are not permitted to begin conceptualizing a database update until the requirements have been finalized by the funder. USCCB/MRS is requesting a six-month build timeline, along with a six-month window to troubleshoot and begin collecting the new data points, with the expectation that at the start of FY 2025 this data could be reported to ORR in full. This proposal would ensure comprehensive data reporting in the first reporting period of FY 2025.

a. Comments on Specific Data Points

Form	Field(s)	Data	ORR Allowable Options	USCCB Comments on the Field(s)
Client Information Form	7	Immigration Status	REF ASY CHE SIV VOT AMR AHP UHP U.S. born REF U.S. born ASY U.S. born CHE U.S. born SIV U.S. born VOT U.S. born AMR U.S. born AHP U.S. born UHP	USCCB suggests the use of “U.S. Citizen” rather than “U.S. born (insert immigration type)”. In addition to the ORR proposed option being an inaccurate description of the child’s immigration status, USCCB/MRS anticipates confusion for minors with parents who do not possess the same immigration status.

Client Information Form	32	Temporary Housing Type	With Sponsor With Non-Sponsor AirBnB Hotel Homeless Shelter Domestic Violence Shelter Transitional Shelter Sponsor Financed Housing	Is USCCB/MRS to understand the term “sponsor” in the legal sense of the word (e.g., the sponsor has filed an I-134)? In other words, is a U.S. tie a “non-sponsor”?
MG Enrollment Form	12, 19, 26	Occupation Categories	See list in Data Collection Instructions Attachment (Row R)	This is a very short list of occupations. USCCB/MRS recommends including an “Other” option with the ability to provide an explanation.

Thank you for considering our input on these issues. Please direct any related questions to Rachel Pollock (rpollock@usccb.org), USCCB/MRS’ director of Resettlement Services.

In partnership,



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U.S. Conference of Catholic Bishops