New York State Office of Temporary and Disability Assistance
Comment Regarding U.S. Department of Health and Human Services Proposed
Information Collection Activity
Refugee Data Submission System for Formula Funds Allocations and Service
Analysis (ORR–5)

     I.   Summary

The Office of Temporary and Disability Assistance (OTDA) is charged with the supervision of several public benefit programs for the State of New York, including Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), the Home Energy Assistance Program (HEAP), and Refugee Resettlement Programs. OTDA's mission is to help vulnerable New Yorkers meet their essential needs and advance economically by providing opportunities for stable employment, housing, and nutrition.

Through this proposed information collection activity, the federal Office of Refugee Resettlement (ORR) plans to continue collecting data associated with the current ORR-5 report, but also proposes to add two new fields, email address and phone number, to the ORR-5 report. ORR specifically asks for comments regarding whether the information is necessary for the performance of the functions of the agency, whether the information will have practical utility, the accuracy of the agency's estimate of the burden of the proposed collection of information, the quality of the information to be collected and ways to minimize the burden of responding to the information collection. OTDA offers the following comments in response to ORR's request and respectfully recommends against the addition of the email address and phone number fields to the ORR-5 report for the below stated reasons.

     II.   OTDA does not believe that the proposed collection of information is necessary for the proper performance of the functions of the agency, nor that it will have practical utility.

Per OMB # 0970-0043, the ORR-5 data submission "helps establish resource allocation for the Refugee Support Services (RSS) grant…; and outcomes in the RSS program for clients and their family members…" In general, the ORR-5 is the data submission of populations served within a state and includes service enrollment and exit dates and outcomes in the RSS program for clients and their family members with a Family Self-Sufficiency Plan (FSSP). The proposed collection of client email address and client phone number are unrelated to determining the number of individuals served, unnecessary for the proper performance functions of the agency, and do not have practical utility because federal grantees already report the number of individuals served on the ORR-5.

The first 14 data fields of the ORR-5, which are considered "arrival information," provide sufficient information for ORR to conduct its data match to establish the resource allocation for the RSS grant. The proposed additional fields of email address and phone number are not reliable fields in terms of attempting to match data and therefore would be of limited value to the data match process. Data fields 17-24 capture enrollment and exit dates for Refugee Cash Assistance (RCA), Refugee Medical Assistance (RMA), Medical Screening, and RSS. Therefore, ORR should not need to contact individuals to obtain such service data, further diminishing the need for the proposed data collection.

The Federal Register notice states, "Adding these data points will enable ORR to obtain updated contact information for refugees who received ORR-funded services." However, it is OTDA's firm belief that ORR does not need updated contact information for refugees because it is both unnecessary for ORR to contact refugees instead of direct service providers doing so and it may have unintended consequences if ORR were to collect and use this information, including potentially diminishing refugee participation in ORR programs. Resettlement agencies and direct service providers may collect such information in order to contact refugee program participants for direct service provision. Refugees have developed a trust with these resettlement agencies and direct service providers. Refugees and other ORR-eligible populations may come from countries where government is an entity that is not to be trusted or even feared. If a resettlement agency or direct service provider shared client email addresses and phone numbers with ORR, this could erode the levels of trust that resettlement agencies and service providers have worked to establish. The Federal Register notice does not specifically state how the email address and phone number would be used by ORR. However, if ORR were to contact refugees directly, that could have a chilling effect on the willingness of refugees and other ORR-eligible populations to participate in ORR programs. Lastly, refugees and other vulnerable populations are taught that unsolicited phone calls may be scams or other attempts to steal or compromise their information. For these reasons, OTDA respectfully suggests that it is resettlement agencies and direct service providers that should continue to contact refugees and other ORR-eligible populations directly, rather than ORR or other federal government officials.

III.   OTDA does not believe that ORR has accurately assessed the burden of collecting the additional data fields of email address and phone number.

Currently, neither the Welfare Management System (WMS), the system used to record, maintain, and process information on persons who apply for or are eligible for social services benefits or services in New York State, nor the Bureau of Refugee Services (BRS) Information Network (BIN), the web-based system used by service providers to report individual participant data and contract performance, and to prepare claims for payment, collect client email address. The proposed data collection would be a burden as it would require changes to both the BIN system and the BRS client enrollment forms to add the proposed data fields. The addition of these data fields would require information technology resources to make systems changes and it would also require staff time and resources to modify program enrollment forms. In addition, due to the limits of WMS as a legacy system, it cannot be updated to store email addresses, meaning there would be no automated way to report complete email address information. (OTDA does retain some email address information for certain public benefits applicants who apply online. However, in order to create a report that includes even this incomplete information, additional programming and information technology resources would be required.)

IV.   OTDA has concerns about the quality, utility, and clarity of the information that is proposed to be collected.

Every year, thousands of entries by states that are entered into Refugee Arrivals Data System through the ORR-5 data submission are rejected by ORR due to "bad data" during the data match. For example, if the date of birth for the refugee associated with Alien number 123456789 did not match the date of birth maintained by ORR, that record is rejected. The addition of these two data fields increases the likelihood of data rejection as many individuals among refugee and other ORR-eligible populations regularly change their phone numbers.

Furthermore, if ORR's intention is to contact refugees via phone or email, it is important to note that many low-income populations may not have an email address or have access to technology to check email regularly. Email is currently an optional field on certain applications for public benefits. This field is not captured or stored in the system of record in New York's WMS. Applicants are not required to establish an email address in order to apply for benefits, and those who have an email address may choose not to provide it. In addition, as noted, many individuals among refugee and other ORR-eligible populations change phone numbers frequently, which may mean that this data is not reliable and would have little utility to ORR.

V.   OTDA does not believe it is possible to minimize the burden of this proposed collection of information.

Due to legacy systems limitations with WMS, it will not be possible for OTDA to collect certain email addresses in a complete, automated manner. In addition, information technology resources, programming, and changes to other systems would be required in order to be able to report this data in an automated way.

VI.   Conclusion

For the above-mentioned reasons, OTDA respectfully recommends against the addition of email address and phone number to the ORR-5 data collection. However, if ORR does move forward with adding email address and phone number, OTDA respectfully requests that these fields be made optional reporting fields. OTDA does not believe that phone number data would be reliable or useful to ORR because of frequent client changes to phone numbers. Additionally, due to the limited data in OTDA's possession and because this data is not stored in an automated fashion, it would be a significant burden on New York State to report email address data.