

Screening Tool for Unaccompanied Alien Children Program Staff and Visitors

**OMB Information Collection Request
0970 - 0543**

Supporting Statement Part A - Justification

August 2020

Submitted By:
Unaccompanied Alien Children Program
Office of Refugee Resettlement
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The emergence of the COVID-19 infectious disease pandemic has necessitated action to help ensure unaccompanied alien children and program staff health and safety within the Unaccompanied Alien Children (UAC) Program.

OMB originally approved a COVID-19 screening tool (“risk questionnaire”) for Unaccompanied Alien Children (UAC) program staff and visitors on March 20, 2020 under a request for emergency approval (OMB #0970-0543). Since ACF received approval for this information collection, the Center for Disease Control (CDC) released updated guidance on COVID-19 symptoms and response, necessitating minor updates to the risk questionnaire. The proposed changes to the previously approved risk questionnaire include a list of updated COVID-19 symptoms; additional questions about whether the individual has been tested for COVID-19; and instructions on how to conduct a temperature check. ORR added questions about testing based on the states increasing ability to conduct more COVID-19 tests than they were able to at the time the original guidance was issued in March. Similarly, the revised risk questionnaire omitted a question about an individual’s travel history because at the time the revised guidance was issued in July, COVID had become a global problem and was no longer only prevalent in the four international locations (China, Iran, South Korea, most of Europe) previously identified on the questionnaire.

Due to the prolonged forecast of the COVID-19 pandemic, ACF is requesting a 3-year extension of this information collection in order to continue to collect vital information in protecting the health and safety of UAC and program staff.

2. Purpose and Use of the Information Collection

The COVID-19 risk questionnaire asks participants whether or not they display COVID-19 symptoms, whether or not they have had close contact with individuals known to test positive for COVID-19, whether the individual has been tested for COVID-19, has been exposed to someone with known or possible COVID-19, or has been tested for COVID-19, and requests a temperature check.

The information collected by conducting this survey at UAC programs will help ensure the health and safety of children in our care and our program staff by helping to identify and reduce potential exposure to COVID-19.

3. Use of Improved Information Technology and Burden Reduction

This short 5 question survey does not require any technology to effectively implement. Respondents will complete the questions upon arrival at the program, they will not be collected electronically.

4. Efforts to Identify Duplication and Use of Similar Information

There is currently no duplication of the information this questionnaire is collecting. Also, responses are unique to each respondent for that particular day.

5. Impact on Small Businesses or Other Small Entities

No significant impacts on small businesses or other small entities are anticipated based solely on this collection.

6. Consequences of Collecting the Information Less Frequently

If programs are unable to implement this screening, it is possible that COVID-19 positive staff or visitors may be mistakenly allowed into programs, potentially exposing significant numbers of staff and children to the virus and continuing the spread of the pandemic.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency’s intention to request an OMB review of this information collection activity. This notice alerted the public to a request for emergency approval for six months of data collection and provided a sixty-day comment period related to this full request that we are submitting to continue data collection beyond six months. This notice was published on March 24, 2020, Volume 85, page 16636, and provided a sixty-day period for public comment. ACF did not receive any comments.

9. Explanation of Any Payment or Gift to Respondents

Respondents will not receive any payment or gifts.

10. Assurance of Confidentiality Provided to Respondents

Individual responses to this questionnaire are strictly for use to protect the public health of UAC program staff and UAC in ORR care.

11. Justification for Sensitive Questions

There is some sensitivity regarding individual responses as their responses may indicate they are experiencing symptoms of infection, have been exposed to someone with known or possible COVID-19, or have been tested for COVID, and requests a temperature check.-. This information is necessary to ensure the health and safety of children in ORR’s care.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
UAC COVID-19 Risk Questionnaire	15,000	260	0.033	128,700	\$16	\$2,059,200
Estimated Annual Burden Total:				128,700	Estimated Annual Cost Total:	\$2,059,200

The cost to respondents was calculated using the minimum wage for Texas, where the bulk of our UAC programs reside, which is \$8/hour. To account for fringe benefits and overhead, the rate was multiplied by two, which is \$16. Minimum wage data was collected from the Bureau of Labor and is available here:

<https://www.dol.gov/agencies/whd/minimum-wage/state>

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional costs to respondents or record keepers.

14. Annualized Cost to the Federal Government

ACF anticipates minimal costs to the federal government to implement this collection of information. No additional staff are required to facilitate the collection of information in programs as it may be completed as a collateral duty. There may be some opportunity costs if time that is spent on other work would be shifted to collecting this information. ACF does anticipate minimal costs to the federal government to analyze findings from the survey and act on received information. ACF assumes this work will be performed by GS13 staff = \$40.00/hour (<https://www.federalpay.org/gs/2019/GS-13>). As such, we estimate the annualized cost to the federal government to be \$4,360.

Federal Hour and Cost Estimates:

<i>Activity</i>	<i>Estimated Hour Burden</i>
Analyzing and Acting on Received Information	2 hours/week * 52 weeks = 104 hours
Total Estimated Hours	104 hours
Total Estimated Annualized Cost	\$4,160

15. Explanation for Program Changes or Adjustments

OMB originally approved this information collection under a request for emergency approval in March of 2020. ACF is proposing minor changes to the risk questionnaire to incorporate

updated guidance from the CDC. In the revised risk questionnaire, ORR added questions about testing based on the states increasing ability to conduct more COVID-19 tests than they had at the time the original guidance was issued in March. Similarly, the revised risk questionnaire omitted a question about an individual's travel history because at the time the revised guidance was issued in July, COVID had become a global problem and was no longer only prevalent in the four international locations (China, Iran, South Korea, most of Europe) previously identified on the questionnaire.

16. Plans for Tabulation and Publication and Project Time Schedule

ACF has no intention to publish this data.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.