# Unaccompanied Alien Children Assessments for Children and Sponsors

OMB Information Collection Request 0970 - NEW

# Supporting Statement Part A -Justification

April 2025

Type of Request: New

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

#### **Summary**

The Office of Refugee Resettlement (ORR) Unaccompanied Alien Children (UAC) Bureau has undertaken a reorganization of its information collections with the goal of promoting operational efficiency for the UACB by creating more unique information collections with fewer total forms under each OMB number. This will reduce the burden associated with renewing large collections and clarify future requests for modifications and renewals under these narrower purpose-specific collections. This package pertains to the creation of a new information collection: Unaccompanied Alien Children Assessments for Children and Sponsors (OMB #0970-NEW)

Under this application for, ORR proposes to revise and transfer seven existing forms currently approved under the *Services Provided to Unaccompanied Alien Children* (OMB# 0970-0553) information collection, as well as the creation of two new instruments.

#### 1. Circumstances Making the Collection of Information Necessary

The Office of Refugee Resettlement (ORR) Unaccompanied Alien Children (UAC) Bureau provides care and custody for unaccompanied alien children until they can be safely released to a sponsor, repatriated to their home country, or obtain lawful immigration status. ORR funds residential care provider facilities that provide temporary housing and other services to children in ORR custody. Generally, care provider facilities are State-licensed, except those located in states unwilling to consider them for licensure and temporary emergency or influx care facilities and must meet ORR requirements to ensure a high-level quality of care. In order to adequately provide for the safety and wellbeing of children in ORR care, ORR conducts assessments of the child upon admission and at routine intervals while in ORR custody. Concurrently, ORR must identify and assess the suitability of potential sponsors and household members to ensure safe and timely release of the child to vetted and adult, qualified to provide for the child's physical and emotional wellbeing.

ORR uses several instruments to carry out its responsibilities with respect to UAC. These instruments are used, for example, to evaluate the child's physical and mental health status, capture important biographic data, determine risk of sexual abuse or victimization, and enable ORR to track high-level milestones in the child's case up through release. ORR has also developed an instrument to identify and screen potential sponsors. The instruments in this proposed information collection allow ORR to document the findings of these assessments as required by the Homeland Security Act of 2002 (6 U.S.C. 279); the Trafficking Victims Protection Reauthorization Act of 2008 (8 U.S.C. 1232); the Foundational Rule, 45 C.F.R. Part 410; and the Prevention of Sexual Abuse Interim Final Rule, 45 C.F.R. Part 411. Forms transferred from the *Services* information collection (OMB # 0970-0553) were last approved by OMB on August 22, 2024 and expire on April 30, 2025. Once approved, the Assessments information collection will contain a total of 9 unique, revised forms.

#### Legal Authorities

**Homeland Security Act (HSA), 6 U.S.C. 279** – Transferred responsibilities for the care and placement of unaccompanied alien children from the Commissioner of the former Immigration and Naturalization Service (INS) to the Director of ORR.

William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA), 8 U.S.C. 1232 – Creates additional requirements for the placement, care, and release of unaccompanied alien children in federal custody. The TVPRA also directs ORR to create policies to ensure unaccompanied alien children are protected from traffickers and others seeking to victimize them or otherwise engage them in criminal, harmful, or exploitative activity.

**Unaccompanied Children Program Foundational Rule, 45 C.F.R. Part 410** – Establishes a uniform set of standards and procedures concerning the placement, care, and services provided to unaccompanied alien children in ORR care that is consistent with ORR's statutory duties. Particular to this information collection, the Foundational Rule implements the terms of *Flores* that create responsibilities for HHS and ORR as related to assessing the suitability of a potential sponsor (45 CFR 410.1202); assessing the needs of an unaccompanied alien child throughout their placement with ORR (45 CFR 410.1302); and ensuring language access (45 C.F.R. 410.1306).

**ORR's Interim Final Rule, Standards to Prevent, Detect, and Respond to Sexual Abuse and Sexual Harassment Involving Unaccompanied Children, 45 C.F.R. Part 411** – Sets forth such standards for ORR care provider facilities that house UAC in accordance with section 1101(c) of the Violence Against Women Reauthorization Act of 2013, Pub. L. 113-4 (VA WA 2013) which requires ORR to assess all children for risk of sexual victimization and abusiveness (45 C.F.R. 411.41) and make individualized determinations related to their housing, education, recreation, and other activities or services which ensure the safety and health of all children in care ( 45 C.F.R. 411.42)

#### 2. Purpose and Use of the Information Collection

The instruments included in this new information collection directly relate to the care of UAC for processing pursuant to the Paperwork Reduction Act. These instruments allow ORR to assess unaccompanied alien children upon admission to ORR care, throughout the duration of their placement in ORR custody and inform all case management decisions and services provided to children. Additionally, instruments within this collection allow ORR to assess potential sponsors to determine their suitability to take custody of released children as required by statute, applicable regulations, and ORR policy. The instruments transferred and revised under this collection are:

• **Sponsor Assessment (Form S-5):** This instrument is used by case managers and unification specialists to document their assessment of the suitability of a potential

sponsor to provide for the safety and well-being of a UAC. See e.g. 8 U.S.C. 1232(c)(3); 45 C.F.R. 410.1202; and <u>ORR Policy Guide Section 2.4 Sponsor</u> <u>Assessment Criteria and Home Studies</u>..

- Adult Contact Profile (Form S-7): This instrument is used by unification specialists to create a profile for sponsors, their adult household members, and identified adult caregivers from which all information related to that individual can be accessed.
- Initial Assessment (Form S-8): This instrument is used by care provider case managers and clinicians to screen UAC for trafficking or other safety concerns, special needs, danger to self and others, medical conditions, and mental health concerns. See e.g. 45 C.F.R. 410.1103(b); and <u>ORR Policy Guide Section 3.2.1</u> Admissions for Unaccompanied Alien Children.
- Assessment for Risk (Form S-9): This instrument is an assessment administered by care provider case managers and clinicians to reduce the risk that a child or youth is sexually abused or abuses someone else while in ORR custody. See e.g. 45 C.F.R. 411.41; 45 C.F.R. 411.42; and <u>ORR Policy Guide Section 4.8 Assessment for Risk</u> for related policies.
- UAC Assessment (Form S-11): This instrument is an in-depth assessment used by care provider case managers and clinicians to document information about the UAC that is used to inform provision of services (e.g., case management, legal, education, medical, mental health, home studies), screen for trafficking or other safety concerns, and identify individualized needs, including any needs related to a disability. See e.g. 45 C.F.R. 410.1103(b); and <u>ORR Policy Guide Section 3.3.1 UAC Assessment and Case Review.</u>
- UAC Case Review (Form S-12): This instrument is used by care providers case managers and clinicians as well as contract unification specialists to document new information obtained after completion of the UAC Assessment. See <u>ORR Policy</u> <u>Guide Section 3.3.1 UAC Assessment and Case Review</u> for related policies.
- Individual Service Plan (Form S-13): This instrument is used by care providers case managers and clinicians to document all services provided to the UAC. See e.g. 45 C.F.R. 410.1302(e); <u>ORR Policy Guide Section 3.3 Care Provider Required Services</u> for related policies.

Proposed new instruments include the following:

• Category 4 Reunification Case Review and Staffing (Form *TBD-#*): This is a newly created form which will be used by care provider case managers and clinicians to summarize potential sponsor information identified during the mobility mapping

process and document decisions concerning priority sponsors to pursue. See, e.g., 6 U.S.C. 279(b)(1)(A)-(C); 8 U.S.C. 1232(c)(2)(A); 45 C.F.R. 410.1202.

• Family Finding and Mobility Mapping (Form *TBD-#*): This is a newly created form which will be used by care provider case managers and clinicians to gain an indepth understanding of a child's life story in the context of their familial and social relationships to identify additional potential sponsors and family or kin who may assist in the sponsor identification process. The Mobility Map is an age-appropriate and evidence-based practice, which the child actively participates in and can include drawings as well as written information concerning the above. See, e.g., 6 U.S.C. 279(b)(1)(B); 8 U.S.C. 1232(c)(2)(A); 45 C.F.R. 410.1103.

#### 3. Use of Improved Information Technology and Burden Reduction

ORR is in the process of streamlining information management by consolidating unaccompanied alien children information from disparate storage locations, reducing manual paperwork processing conducted outside of the system (e.g., spreadsheets, PDFs, Word documents), maximizing the use of auto-population so that information is not entered more than once, enforcing business rules through automated workflow management, and improving business intelligence capabilities by automating reporting and data analytics.

#### 4. Efforts to Identify Duplication and Use of Similar Information

The information being collected by these forms are not obtainable from other sources.

#### 5. Impact on Small Businesses or Other Small Entities

The proposed information collections will not burden or impact small businesses.

#### 6. Consequences of Collecting the Information Less Frequently

Not collecting the information requests on these forms would impede ORR from performing its charged duty of providing statutorily mandated services to unaccompanied alien children. Instruments contained in this collection directly inform all decisions concerning child safety and the delivery of required services from the moment of admission to ORR care until release to an approved sponsor; the timely collection of this critical information is required by regulation, and ORR sub-regulatory guidance. Furthermore, all grantees and contractors funded to provide services to these children are required by the terms of their Cooperative Agreements or contracts to comply with all ORR regulations, policies, procedures, and other guidance, which includes collecting the information in these instruments.

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

None of the characteristics outlined in 5 CFR 1320.5(d)(2) apply to the instruments in this collection.

# 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 was published on December 30<sup>th</sup>, 2024, (89 FR, 106485) and provided a sixty-day period for public comment. During the notice and comment period, one comment was received, which is attached in Supplement A.

#### 9. Explanation of Any Payment or Gift to Respondents

No payment or gift will be provided to the respondents.

#### 10. Assurance of Confidentiality Provided to Respondents

ORR established a system of records to ensure the level of confidentiality pursuant to the Privacy Act. 5 U.S.C. 552a. ORR's system of records notice, titled ORR Unaccompanied Children Bureau (UCB) Administrative Program Records, was published on December 12<sup>th</sup>, 2024, at 89 FR 100500.

#### 11. Justification for Sensitive Questions

Sensitive information is collected on the forms for ORR to provide appropriate services to unaccompanied alien children and to make an informed, timely, and safe release decisions. ORR does not ask for any information of a sensitive nature beyond what is needed to provide services and make the release decisions.

# 12. Estimates of Annualized Burden Hours and Costs

The following factors were used to estimate burden hours and cost to respondent:

- The projected number of referrals to ORR custody, transfers within the ORR care provider network, and discharges from ORR custody from October 1st, 2024, to September 30th, 2025, estimated by the U.S. Department of Homeland Security (DHS), Office of Security Statistics (OSS) to be 65,000.
- ORR funds approximately 300 care provider grantees.

- The cost to respondents was calculated using ORR contract pricing as noted below, or the national mean hourly wage data from May 2024 (accessed April 7<sup>th</sup>, 2025), for the following Bureau of Labor Statistics (BLS) job codes:
  - Care Provider Case Manager: (BLS# 21-1021), Child, Family, and School Social Workers in the industry of Other Residential Care Facilities. The rates were multiplied by two to account for fringe benefits and overhead –  $25.53 \times 2 = 51.06$  and total costs were rounded to the nearest whole dollar.
  - Care Provider Clinician: (BLS# 19-3033), Clinical and Counseling Psychologists in the industry of Other Residential Care Facilities. The rates were multiplied by two to account for fringe benefits and overhead: \$36.01 x 2 = \$72.02 and total costs were rounded to the nearest whole dollar.
  - Interpreter: (BLS# 27-3091), Interpreters and Translators in the industry Individual and Family Services The rates were multiplied by two to account for fringe benefits and overhead:  $35.06 \times 2 = 70.12$  and total costs were rounded to the nearest whole dollar.
  - Contract Unification Specialist: ORR Contracted hourly wage: \$24; doubled to account for fringe and benefits yields an average total cost of \$48.
  - Sponsor: ORR uses the Federal minimum non-tipped hourly wage to calculate the opportunity cost to sponsors: \$7.25 (Source: U.S. Department of Labor: Wages; retrieved April 8, 2025) and total cost was rounded to the nearest whole dollar.
  - Child: ORR does not account for the dollar-value of the UAC's time responding to these instruments; they are responding to these instruments as recipients of mandatory services provided at no charge, are generally ineligible for employment due to their age and/ or immigration status and are doing so in their personal capacity.

ORR evaluated each form to determine which parties were responsible for completion and projected an estimated time response time for each instrument based on the number and type of questions asked. Significant changes to existing forms prompted a re-evaluation to increase or decrease the estimated time burden on respondents.

Form Title	Annual Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Estimated Annual Total Burden Hours	Average Hourly Wage	Estimated Total Annual Cost
Sponsor Assessment (S- 5) - Sponsor	68,900	1.0	1.00	68,900.0	\$7.25	\$499,525.00
Sponsor Assessment (S- 5) Case Manager	300	230.0	1.00	69,000.0	\$51.06	\$3,523,140.00

Sponsor						
Assessment (S-	680	101.0	1.00	68,680.0	\$48.00	\$3,296,640.00
5) Unification	000	101.0	1.00	00,000.0	\$10.00	\$5,290,010.00
Specialist						
Sponsor						
Assessment (S-	300	230.0	1.00	69,000.0	\$70.12	\$4,838,280.00
5) - Interpreter						
Adult Contact						
Profile (S-7) -	(00	06.0	0.75	40.060.0	¢ 40.00	¢2 250 000 00
Unification	680	96.0	0.75	48,960.0	\$48.00	\$2,350,080.00
Specialist						
Initial						
Assessment (S-						
8) - Case	300	108.0	0.33	10,692.0	\$51.06	\$545,934.00
Manager						
Initial						
Assessment (S-	300	108.0	0.33	10,692.0	\$72.02	\$770,038.00
	300	108.0	0.55	10,092.0	\$72.02	\$770,038.00
8) - Clinician						
Initial	( = 000	1.0	0.00	01 450 0	<b>#0.00</b>	<b>\$0.00</b>
Assessment (S-	65,000	1.0	0.33	21,450.0	\$0.00	\$0.00
8) - Child						
Initial						
Assessment (S-	300	217.0	0.33	21,483.0	\$70.12	\$1,506,388.00
8) - Interpreter						
Assessment for						
Risk (S-9) -	300	108.0	0.75	24,300.0	\$51.06	\$1,2040,758.00
Case Manager						
Assessment for						
Risk (S-9) -	300	108.0	0.75	24,300.0	\$72.02	\$1,750,086.00
Clinician						
Assessment for						
Risk (S-9) -	65,000	1.0	0.75	48,750.0	\$0.00	\$0.00
Child		-		- )	•	
Assessment for						
Risk (S-9) -	300	217.0	0.75	48,825.0	\$70.12	\$3,423,609.00
Interpreter	500	217.0	0.75	10,02510	\$70.1 <u>2</u>	\$5,125,005.00
UAC						
Assessment (S-						
11) - Case	300	108.0	2.25	72,900.0	\$51.06	\$3,722,274.00
Manager						
UAC	200	109.0	2.25	72 000 0	¢72.02	ØE 250 259 00
Assessment (S-	300	108.0	2.25	72,900.0	\$72.02	\$5,250,258.00
11) - Clinician						
UAC	· <b>-</b> · · · ·		• • •		<b>\$</b> \$\$	<b>*</b> • • •
Assessment (S-	65,000	1.0	2.25	146,250.0	\$0.00	\$0.00
11) - Child						
UAC						
Assessment (S-	300	217.0	2.25	146,475.0	\$70.12	\$10,270,827.00
11) - Interpreter						
UAC Case						
Review (S-12) -	300	217.0	0.50	32,550.0	\$51.06	\$1,662,003.00
Case Manager						
8		1		1		

			Annual Burden Hours Total:	1,355,439.0	Annual Cost Total:	\$61.445,029.00
Family Finding and Mobility Mapping (TBD)- Clinician	300	59.0	1.50	26,550.0	\$72.02	\$1,912,131.00
Family Finding and Mobility Mapping (TBD)- Case Manager	300	117.0	1.50	52,650.0	\$51.06	\$2,688,309.00
Family Finding and Mobility Mapping (TBD)- Child	23,400	2.0	1.50	70,200.0	\$0.00	\$0.00
Category 4 Reunification Case Review and Staffing (TBD) - Clinician	300	49.0	2.50	36,750.0	\$72.02	\$2,646,735.00
Category 4 Reunification Case Review and Staffing (TBD) - Case Manager	300	98.0	1.88	55,125.0	\$51.06	\$2,814,683.00
Individual Service Plan (S- 13) - Interpreter	300	217.0	0.33	21,483.0	\$70.12	\$1,506,388.00
Individual Service Plan (S- 13) - Clinician	300	108.0	0.33	10,692.0	\$72.02	\$770,038.00
Individual Service Plan (S- 13) - Case Manager	300	108.0	0.33	10,692.0	\$51.06	\$545,934.00
UAC Case Review (S-12) - Unification Specialist	680	96.0	0.50	32,640.0	\$48.00	\$1,566,720.00
UAC Case Review (S-12) - Clinician	300	217.0	0.50	32,550.0	\$72.02	\$2,344,251.00

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

There are no other costs to respondents and record keepers.

#### 14. Annualized Cost to the Federal Government

The annualized cost estimate for each of these instruments considers the time of an ORR Federal Field Specialist at the GS-12 – step 01 2025 basic rate of pay in the Washington, DC locality to review information captured in these forms following submittal. No additional costs will be incurred by the Federal government for developing computer systems or storing the instruments as those systems are already in place. The hourly rate was multiplied by two to account for fringe benefits and overhead and total costs were rounded to the nearest whole dollar.

Form	Annual Number of Federal Staff	Number of Reviews per Federal Staff	Average Federal Staff Burden Hours per Review	Estimated Annual Total Federal Staff Burden Hours	Average Federal Staff Hourly Wage	Estimated Annual Total Federal Staff Cost
Sponsor Assessment (S-5)	110	893	0.50	49,115	\$97.18	\$4,772,996.00
Adult Contact Profile (S-7)	110	893	0.38	37,327	\$97.18	\$3,627,477.00
Initial Assessment (S-8)	110	893	0.17	16,699	\$97.18	\$1,622,819.00
Assessment for Risk (S-9)	110	893	0.38	37,327	\$97.18	\$3,627,477.00
UAC Assessment (S-11)	110	893	1.13	111,000	\$97.18	\$10,786,970.00
UAC Case Review (S-12)	110	893	0.25	24,558	\$97.18	\$2,386,498.00
Individual Service Plan (S-13)	110	893	0.17	16,699	\$97.18	\$1,622,819.00
Category 4 Reunification Case Review and Staffing (TBD)	110	402	1.09	48,200	\$97.18	\$4,684,057.00
Family Finding and Mobility Mapping (TBD)	110	482	1.0	39765	\$97.18	\$3,864,363.00
Estir	Estimated Annual Burden Hours Total:				Estimated Annual Cost Total:	\$36,995,476.00

# 15. Explanation for Program Changes or Adjustments

#### **DISCONTINUED FORMS**

ORR is not discontinuing any forms with this package.

#### **NEW FORMS**

ORR is introducing the following newly created forms to this information collection:

- 1. Category 4 Reunification Case Review and Staffing (Form TBD-#)
- 2. Family Finding Mobility Mapping (Form *TBD-#*)

#### FORMS TRANSFERRED FROM A DIFFERENT INFORMATION COLLECTION

ORR is transferring the following forms currently approved under the *Services Provided to Unaccompanied Alien Children* information collection (OMB# 0970-0553) to this information collection with revisions:

#### GLOBAL CHANGES

- 1. Revise Terminology:
  - Replace "Unaccompanied Child" and "UC" with "Unaccompanied Alien Child" and "UAC" wherever they appear to revert to previous program standards and conform with terminology used in the Homeland Security Act (HSA), 6 U.S.C. 279
  - Replace "Gender" with "Sex" and provide only "male" and "female" menu options where applicable in conformance with Executive Order (E.O.) 14168 (*Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*).
  - Minor terminology edits to conform with UACB style guide standards as established in the UC Program Foundational Rule (45 CFR 410) as well as to improve clarity and consistency with other form titles and/or fields.
  - Replace "Primary" language with "Preferred".
- 2. Simplify certain fields that capture both date and time to only capture date when the hour and minute of completion or certification of the form are immaterial.
- 3. Add the following fields:
  - Physical Location of the Child field to the UAC Basic Information section which populates across many forms in the UAC Portal case management system.
  - Translator or Interpreter certification to assessments requiring input directly from a child or sponsor, as relevant.

### FORM-SPECIFIC CHANGES

- 1. Sponsor Assessment (Form S-5)
  - Add new Current Sponsor Status field to the Sponsor Assessment to provide a highlevel progress status for each assessment to inform concurrent planning efforts to identify alternative sponsors and Case Review (Form S-12)
  - Add Date Sponsor Identified to Adult Contact Profile section to improve data tracking for program performance evaluation
  - Revise Proof of Identity Document Type options to conform with updated UAC Policy Guidance Section 2.2.4 Required Documents for Submission with the Application for Release, issued March 7th, 2025
  - Revise Proof of Address Document Type options conform with updated UAC Policy Guidance Section 2.2.4 Required Documents for Submission with the Application for Release, issued March 7th, 2025
  - Revise Proof of Address verification question "Dated within 2 months?" to "Dated within 30 days?"
  - Revise Proof of Relationship Document Type options to conform with updated UAC Policy Guidance Section 2.2.4 Required Documents for Submission with the Application for Release, issued March 7th, 2025
  - Add "Comment" field for Case Managers to document other proof of relationship submitted for Category 3 cases to reliably and sufficiently establish a bona-fide social relationship with the child and/or family in country of origin
  - Revise Proof of Identity Document Type for Household Members to conform with updated UAC Policy Guidance Section 2.2.4 Required Documents for Submission with the Application for Release, issued March 7th, 2025
  - Revise "Proof of Income" field under Employment section to a dropdown menu with the following options:
    - Previous Year's U.S. Tax Return
    - Paystubs covering last 60 days continuous
    - Original letter from employer on company letterhead verifying sponsor's employment and salary, dated within <60 days
    - ORR Affidavit of support
    - Bank statements
    - Public Assistance Records TANF
    - Public Assistance Records SSI
    - Public Assistance Records Cash Assistance
    - Public Assistance Records Other entitlement Program
    - Records of interest or income earned from assets or investments
  - Revise Proof of Identity Document Type options for Alternate Caregiver to conform with updated UAC Policy Guidance Section 2.2.4 Required Documents for Submission with the Application for Release, issued March 7th, 2025
  - Revise "Substance Abuse Disclosed by Sponsor" under Criminal History and Background Checks Self Disclosure section to read "Legal issues related to drug or

alcohol use (e.g., D.U.I., D.W.I., Possession, Manufacture. Distribution of controlled substances)" to better capture data concerning the sponsor's risk profile

- Add several questions to the "Care Plan" section of the form to document the sponsor's awareness and ability to care for the child's healthcare needs
- In response to public comment, add the following questions to the "Care Plan" section to document the actions ORR has taken to uphold its obligations under the *Lucas R*. Settlement Agreement:
  - Affirmative efforts to support children with identified disabilities and their sponsors with referral to appropriate community-based services
  - Affirmative efforts to educate the potential sponsor on the child's specific disability-related needs
  - Document any reasonable accommodation or modifications made to the sponsorship process to facilitate the safe release of a child to a sponsor with an identified disability
- Add functionality to add multiple adult caregivers to the "Care Plan" section of the form and identify one as the current or primary caregiver
- Add a sponsor-child debt attestation question to the "Trafficking" and "Fraud" section of the form to document the sponsor's understanding and intent to comply with ORR policy prohibiting the sponsor from seeking or collecting any financial renumeration from the child or their family or encouraging the child to work counter to child labor laws or without a legal permit
- Rename "Summary Case Manager Assessment Tab" to "Sponsor Assessment Summary Tab" to reflect inclusion of the Unification Specialist role and emphasize that the summary step before certification of the form
- Add Unification Specialist role, contact information, and recommendation fields to the Summary Sponsor Assessment section
- Add the following fields in response to public comment to document the actions ORR has taken to uphold its obligations under the *Lucas R*. Settlement Agreement:
  - Under Unification Specialist Assessment, add a field to affirmatively document how the sponsor suitability recommendation considers the assistance ORR must provide to potential sponsors of children with disabilities
  - Under the Case Manager Assessment, modify the assessment instructions to specifically direct the Case Manager to document their evaluation of the benefits of placing the child with this sponsor in the sponsor's community setting
  - Under the Case Manager Assessment, add the following fields:
    - "Do you have any outstanding concerns related to the child's disability? (Yes/ No/ Not Applicable)
    - If you answered Yes, describe the steps ORR will take to help the sponsor better understand the child's needs related to the child's disability, the post-release services ORR will assist the sponsor in coordinating, and whether these efforts will enable the child's safe release.

- If you answered "Yes", describe whether ORR has taken all actions contemplated by the transition plan in the child's 504 Individualized Service Plan.
- Add an open text field that is triggered by conditional logic when the assessment is completed outside of the five-calendar day deadline, prompting the respondent to indicate a reason for the delay
- Adjust the burden estimate to account for a decrease in the number of children placed in ORR care reflect that the form is completed by four different groups of respondents, and to reflect a slight increase in the overall number of fields the respondents will need to complete. The annual number of Case Manager respondents increased from 216 to 300. The annual number of Unification Specialists is estimated to be approximately 680, the annual number of Interpreter respondents is estimated to be 300, and the number of sponsors expected to participate in the assessment is expected to increase from 57,195 to 68,900. The annual number of responses per respondent changed as follows: The number of responses per sponsor remains unchanged at 1, the number of responses per Case Manager is expected to decrease from 265 to 230, the number of responses per Unification Specialist is estimated to be 101, and the number of responses per Interpreter is estimated to be 230. The average burden hours per response remains unchanged at 1 hour, reflecting few substantive changes described above.

# 2. Adult Contact Profile (formerly titled New Sponsor) (Form S-7)

• Remove the "Legal Status" question from the form as irrelevant and immaterial to facilitating better data tracking across cases

# 3. Initial Intakes Assessment (Form S-8)

- Clarify instructions to the respondent mandating the assessment to be completed within 24 hours of admission to the care provider program
- Introduce questions related to languages spoken, fluency, and comprehension to document the child's understanding of the assessment questions
- Add a field to the "Family Information" section to indicate if a relative might be a potential sponsor
- Rephrase sensitive questions pertaining to mental health concerns using more specific and child-friendly terms and eliminating redundant questions
- Adjust the burden estimate to account for a projected increase in the number of children placed in ORR care since the form's last renewal and reflect that the form is completed by three different potential respondents with input from the child. The annual number of Case Manager respondents is expected to increase from 216 to 300, the annual number of Clinician respondents is estimated to be 300, the annual number of Interpreter respondents is estimated to be 300, and the number of children projected to be referred in FY 2025 is expected to increase from 60,048 to 65,000. The annual number of responses per respondent changed as follows: The number of responses per Case Manager is expected to decrease from 265 to 108, the number of responses per

Clinician is estimated to be 108, and the number of responses per Interpreter is estimated to be217. The average burden hours per response remains unchanged at .33 hours, reflecting the minimal substantive changes described above.

# 4. Assessment for Risk (Form S-9)

- Clarify terminology concerning the purpose of the assessment in the instructions to the respondent
- Revise question text in the following ways:
  - Include more specific and child-friendly terminology concerning sensitive topics related to sexual activity and sexual abuse history
  - Incorporate "suspected or diagnosed" terminology to questions pertaining to disabilities
  - Add citation to the authorizing statute: ORR Standards to Prevent, Detect, and Respond to Sexual Abuse and Sexual Harassment Involving Unaccompanied Children (45 C.F.R. 411.41-42)
- Add fields to document the following:
  - If the child would like to be referred to a mental health counselor or clinician to discuss their past sexual activity and/or sexual abuse history
  - If the child or caretaker in home country report any issues with the child's ability to carry out tasks of daily living that may affect the child's housing assignment while in ORR care
  - The creation of an Individualized Section 504 Service Plan under the "Actions Taken" question of the "Housing," "Other Service Assignments," and "Follow-Up" Section
- Remove question text specific to sexual orientation gender identity labels
- Adjust the burden estimate to account for a projected decrease in the number of children placed in ORR care since the form's last renewal and reflect that the form is completed by three different potential respondents with input from the child. The annual number of Case Manager respondents is expected to increase from 216 to 300 the annual number of Clinician respondents is estimated to be 300, the annual number of Interpreter respondents is estimated to be 300, and the number of children projected to be referred in FY 2025 is expected to decrease from 120,096 to 65,000. The annual number of responses per respondent changed as follows: The number of responses per child remains unchanged at 1, the number of responses per Case Manager is estimated to be 108, and the number of responses per Interpreter is estimated to be 217. The average burden hours per response remains unchanged at .75 hours, reflecting the minimal substantive changes described above.

# 5. UAC Assessment (Form S-11)

- Add the following fields to the "Journey and Apprehension" section:
  - What neighbors or other people were important in your daily life in Country of Origin (COO)?

- Did someone you know come to the U.S. before you and tell you about opportunities?
- Did you meet any adults along the journey with whom you built a trusting relationship? If yes, what are their names and where are they now?
- Who are some trusted adults that the child knows at their intended destination?
- As a sub-question to "Have you been to the U.S. before?"–Ask: "if yes, with whom did you live?"
- Under the "Family/Significant Relationships" section, add:
  - Name, address, contact, and relationship of parent or legal guardian fields
  - Field to capture current address/residence of other family remaining in country of origin
  - Fields to capture contact info and indicate sponsorship potential of identified friends and/ or family residing in the U.S.
  - A field to document any family members who previously lived in the U.S., their dates of residence and if they maintain contact with any former U.S.-based contacts
- Revise Medical Assessment questions to capture more specific health status and health concern data as follows:
- Adding fields related to current health status, allergies, diet, mobility, and the child's need for assistance with daily activities
- Add field to capture if the child has any health concerns they'd like to discuss with a health care provider
- Add fields to capture data concerning any medication the child arrived with, their prescribed dosing interval and last dose administered
- Add the following question to the Education section: "Have you ever been diagnosed with a learning disability (dyslexia, dysgraphia, auditory processing disorder, etc.)? (Yes/No) If yes, specify"
- Update terminology concerning the ORR mandated Legal Screening to read "Confidential Legal Consultation", as required by the Unaccompanied Children Program Foundational Rule (45 C.F.R. 410.1309(a)(2)(v))
- Revise the Mental Health section of the form as follows:
  - Add "Future Oriented" option to "Thought Process" field
  - Revise terminology throughout and split compound questions into simpler, distinct questions to improve child-friendliness of the assessment and the specificity of their responses
  - Add question concerning the use of inhalants to the "Substance Use History" sub-section
- Revise the Criminal History section, adding questions to document gang affiliation history with the following fields to correspond with CBP referral data:
  - Known Gang Affiliation? (Yes / No / Unknown / Suspect)
  - Name of Gang: (Open Text Field)
  - Gang Affiliation Summary: (Open Text Field)

- Determined by: (Self-admission of child/ Gang Tattoos/ Gang Affiliation Summary)
- Revise the "Trafficking" section, adding questions to document contacts with others that the child made during their journey to the U.S. and capture their contact information
- Add explanatory text to the Americans with Disabilities Act of 1990, 42 U.S.C. 12102(1) citation under the "Trafficking Victims Protection Reauthorization Act (TVPRA)" section and the subsequent question documenting disability concerns that require further evaluation
- Add document upload field to "Additional Information" section to link the child's journey mapping file to the UAC Assessment
- Adjust the burden estimate to account for a projected decrease in the number of children placed in ORR care since the form's last renewal and reflect that the form is completed by three different potential respondents with input from the child. The annual number of Case Manager respondents is expected to increase from 216 to 300, the annual number of Clinician respondents is estimated to be 300, the annual number of Interpreter respondents is estimated to be 300, and the number of children projected to be referred in FY 2025 is expected to decrease from 120,096 to 65,000. The annual number of responses per respondent changed as follows: The number of responses per child remains unchanged at 1, the number of responses per Case Manager is estimated to be 108, and the number of responses per Interpreter is estimated to be 217. The average burden hours per response is expected to increase from 2.0 to 2.25 hours, reflecting the addition of new fields described above.

# 6. UAC Case Review (Form S-12)

- Revise the Medical Section with the following:
  - Remove the following fields:
    - "List any allergies"
    - "Do you feel unwell"
    - "If yes, what are your symptoms?"
    - "Additional medical information"
    - Entire Medical History Checklist as redundant to information captured in the UAC Portal Health Tab
    - Entire Medication History subsection as redundant to information captured in the UAC Portal Health Tab
  - Add the following fields:
    - "Does the child have any health concerns (medical, mental health, dental) that have not been evaluated by a healthcare professional? If yes, specify:"
    - "Does the child have any health-related travel restrictions? If yes, specify:"
    - "Provide a short summary of the child's medical and/ or psychological functioning:"

- "If the child is ready for discharge, does the child have any health problems, including dental and mental health, that requires follow-up after release from ORR care? If yes, specify:"
- "Describe follow-up care plan:"
- Replace "Legal Screening" with "Confidential Legal Consultation" consistent with phrasing used in the UAC Program Foundational Rule (45 C.F.R. 410.1309(a)(2)(v)).
- Add "Criminal History and Gang Affiliation" section with the following sub-fields to capture updates from the UAC Assessment:
  - New Known Gang Affiliation? (Yes / No / Unknown / Suspect)
  - Name of Gang: (Open Text Field)
  - Gang Affiliation Summary: (Open Text Field)
  - Determined by: (Self-admission of child/ Gang Tattoos/ Gang Affiliation Summary)
- Remove all fields from the "Mental Health" section to avoid duplication under the "Medical" section and remove "Axis" evaluation terminology which no longer conforms to standard psychiatric practice as specified in the 5th edition of the Diagnostic and Statistical Manual (DSM-V).
- Revise the section "Mandatory TVPRA, 2008" section as follows:
  - Mirror changes to the TVPRA section as pertaining to the addition of explanatory text for the 42 U.S.C. § 12102(1) and related fields.
  - Add fields to document the recommended level of post release services and type of home study
- Revise the Recommendation section to include a concurrent planning subsection capturing the following:
  - If the case is undergoing concurrent planning
  - Name, contact info, sponsor category, and status of additional potential sponsors
- Revise Care Plan section as follows:
  - Add fields to capture and distinguish Unification Specialist, Clinician, and Case Manager comments
  - Remove Legal comments as field duplicates information collected in Legal section
- Adjust the burden estimate to account for a projected decrease in the number of children placed in ORR care since the form's last renewal and reflect that the form is completed by three different potential respondents. The annual number of Case Manager respondents is expected to increase from 216 to 300, the annual number of Clinician respondents is estimated to be 300 the annual number of Unification Specialist respondents is estimated to be 300, and the number of children projected to be referred in FY2025 is expected to decrease from 120,096 to 65,000. The annual number of responses per Case Manager is expected to decrease from 556 to 217, the number of responses per Clinician is estimated to be 217, and the number of responses per Unification Specialist is estimated to be 96. The average burden hours per response is expected

to decrease from 2.0 to .5 hours, reflecting the removal of numerous fields described above.

- 7. Individual Service Plan (Form S-13)
  - Add a field to the Data Entry–Admission Assessment Individual Service Plan to identify if the child has an Individualized 504 Service Plan to document any services, supports, equipment, treatment, program modifications, or accommodations needed due to their disability status.
  - Add the following auto-populated and system generated fields to the UAC Portal Individual Service Plan display window:
    - Assessment Status
    - Does the child have an Individualized 504 Service Plan?
    - Submitted Date
  - Remove certain fields native to the UC Path system which do not have a corresponding feature or function in the UAC Portal:
    - Under New Admission Assessment Section:
      - Assessment ID
      - Admission
    - Under New Service Mandatory Section:
      - Contract Number (SYSTEM GENERATED)
      - Individual Service Plan (SYSTEM GENERATED)
      - Entity Name (AUTO-POPULATE)
    - Under Document Upload Tab Section:
      - Verified by Government Agency/ Consulate
      - Entity
      - Individual
      - Adult Contact Relationship
    - Under Certification by Case Manager Section:
      - Legacy ID (SYSTEM GENERATED)
  - Revise the Legal Orientation task from "Legal Screening" to "Confidential Legal Consultation" to conform with terminology presented in the Unaccompanied Children Program Foundational Rule (45 CFR 410.1309(a)(2)(v))
  - Replace "Contract" with "Service" where it appears on the form
  - Display content entered in the New Contract "Notes" field to each Internet Service Provider Service
  - Adjust the burden estimate to account for a projected decrease in the number of children placed in ORR care since the form's last renewal and reflect that the form is completed by three different potential respondents with input from the child. The annual number of Case Manager respondents is expected to increase from 216 to 300, the annual number of Clinician respondents is estimated to be 300, the annual number of Interpreter respondents is estimated to be 300, and the number of children projected to be referred in FY 2025 is expected to decrease from 120,096 to 65,000. The annual number of responses per respondent changed as follows: The number of

responses per Case Manager is expected to decrease from 694 to 108, the number of responses per Clinician is estimated to be 108, and the number of responses per Translator is estimated to be 217. The average burden hours per response remains unchanged at .33 hours reflecting the minimal substantive changes described above.

#### 16. Plans for Tabulation and Publication and Project Time Schedule

ORR does not plan to publish the information provided by the respondents.

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

ORR plans to display the expiration date of clearance as set by OMB

#### 18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.