

Services Provided to Unaccompanied Children

**OMB Information Collection Request
0970 –0553**

Supporting Statement Part A - Justification

September 2021

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

SUPPORTING STATEMENT A – JUSTIFICATION

Summary

This request is for revisions to 11 of the forms and removal of one form currently approved under OMB #0970-0553, and to add 11 new forms under this OMB number. All instruments, except one, will be incorporated into ORR's new case management system, UC Path. Details about the changes are described in section A15.

1. Circumstances Making the Collection of Information Necessary

The Homeland Security Act (HSA), 6 U.S.C. 279, transferred responsibilities for the care and placement of unaccompanied children (UC) from the Commissioner of the former Immigration and Naturalization Service (INS) to the Director of the Office of Refugee Resettlement (ORR).

The *Flores v. Reno* Settlement Agreement, No. CV85-4544-RJK (C.D. Cal. 1996), establishes an order of priority for sponsors with whom UC should be placed and sets minimum standards for the release, housing, services, transportation, and discharge of UC. *Flores* also entitles Plaintiffs' counsel to visit ORR facilities.

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

ORR's Interim Final Rule on the Standards to Prevent, Detect, and Respond to Sexual Abuse and Sexual Harassment Involving Unaccompanied Children, 45 CFR Part 411, sets forth such standards for ORR care provider facilities that house UC in accordance with section 1101(c) of the Violence Against Women Reauthorization Act of 2013, Pub. L. 113-4 (VAWA 2013).

ORR's UC Program provides care and custody for UC until they can be safely released to a sponsor, repatriated to their home country, or obtain legal status. ORR funds residential care provider facilities that provide temporary housing and other services to UC in ORR custody. Care provider facilities are State licensed, with the exception of temporary influx care facilities, and must meet ORR requirements to ensure a high-level quality of care. Services provided at care provider facilities include, but are not limited to, education, recreation, vocational training, acculturation, nutrition, medical, mental health, legal, and case management.

The instruments included in this information collection are directly relate to the care of UC for processing pursuant to the Paperwork Reduction Act. These instruments allow ORR to provide services to UC as required by statute and ORR policy. The instruments are:

- Sponsor Assessment (Form S-5)
- Home Study Assessment (formerly titled Home Study Report) (Form S-6)
- Adult Contact Profile(formerly titled New Sponsor) (Form S-7)
- Initial Intakes Assessment (Form S-8)
- Assessment for Risk (Form S-9)
- UC Assessment (Form S-11)

- UC Case Review (Form S-12)
- Individual Service Plan (Form S-13)
- Long Term Foster Care Travel Request (Form S-14)
- Child Advocate Recommendation and Appointment (Form S-15)
- 30 Day Restrictive Placement Case Review (formerly titled Summary Notes: Thirty Day Restrictive Placement Case Review) (Form S-16)

The following are new additions under this OMB number:

- Admission (Form S-18)
- Home Study/Post-Release Service (HS/PRS) Referral (Form S-19)
- UC Authorized/Restricted Call List and Call Log (Form S-20)
- Home Study/Post-Release Service (HS/PRS) Primary Provider Entity (Form S-21A)
- Home Study/Post-Release Service (HS/PRS) Subcontractor Entity (Form S-21B)
- Home Study/Post-Release Service (HS/PRS) Primary Provider Profile (Form S-21C)
- Home Study/Post-Release Service (HS/PRS) Subcontractor Profile (Form S-21D)
- Post-Release Service (PRS) Event (Form S-22)
- Case Manager Call Log and Case Notes (Form S-23)
- Sponsor Application (Form S-24)
- Ohio Youth Assessment System (OYAS) Reentry Tool

2. Purpose and Use of the Information Collection

- **Sponsor Assessment (Form S-5):** This instrument is used by case managers to document their assessment of the suitability of a potential sponsor to provide for the safety and well-being of a UC. See [ORR Policy Guide Section 2.4 Sponsor Assessment Criteria and Home Studies](#) for related policies.
- **Home Study Assessment (formerly titled Home Study Report) (Form S-6):** This instrument is used by home study providers to document their assessment of a potential sponsor after performing a home site visit. See [ORR Policy Guide Section 2.4 Sponsor Assessment Criteria and Home Studies](#) for related policies.
- **Adult Contact Profile (formerly titled New Sponsor) (Form S-7):** This instrument is used by care providers to create a profiles for sponsors, their adult household members, and identified adult caregivers from which all information related to that individual can be accessed.
- **Initial Intakes Assessment (Form S-8):** This instrument is used by care providers to screen UC for trafficking or other safety concerns, special needs, danger to self and others, medical conditions, and mental health concerns. See [ORR Policy Guide Section 3.2.1 Admissions for Unaccompanied Children](#) for related policies.
- **Assessment for Risk (Form S-9):** This instrument is an assessment administered by care providers to reduce the risk that a child or youth is sexually abused or abuses someone else

while in ORR custody. See [ORR Policy Guide Section 4.8 Assessment for Risk](#) for related policies.

- **UC Assessment (Form S-11):** This instrument is an in-depth assessment used by care providers to document information about the UC 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 special needs. See [ORR Policy Guide Section 3.3.1 UC Assessment and Case Review](#) for related policies.
- **UC Case Review (Form S-12):** This instrument is used by care providers to document new information obtained after completion of the UC Assessment. See [ORR Policy Guide Section 3.3.1 UC Assessment and Case Review](#) for related policies.
- **Individual Service Plan (Form S-13):** This instrument is used by care providers to document all services provided to the UC. See [ORR Policy Guide Section 3.3 Care Provider Required Services](#) for related policies.
- **Long Term Foster Care Travel Request (Form S-14):** This instrument is used by long term foster care providers to request ORR approval for a UC to travel with their foster family outside of the local community.
- **Child Advocate Recommendation and Appointment (Form S-15):** This instrument is used by care providers and other stakeholders to recommend appointment of a child advocate for a UC. The child advocate contractor then enters whether a child advocate is available and ORR approves the appointment. See [ORR Policy Guide Section 2.3.4 Child Advocates](#) for related policies.
- **30 Day Restrictive Placement Case Review (formerly titled Summary Notes: Thirty Day Restrictive Placement Case Review) (Form S-16):** This instrument is used by care providers to document their 30-day review for UC in placed in a restrictive setting. See [ORR Policy Guide Section 1.4.2 30 Day Restrictive Placement Case Review](#) for related policies.
- **Admission (Form S-18):** This instrument is used by ORR grantee case managers and clinicians to document the UC's initial needs, functioning, and history. Other instruments are also accessible from within the Admission instrument, such as transfer requests, travel requests, and various child assessments.
- **Home Study/Post-Release Service (HS/PRS) Referral (Form S-19):** This instrument is used by ORR grantee case managers to refer a UC for a home study and/or post-release services. See [ORR Policy Guide Section 2.4 Sponsor Assessment Criteria and Home Studies](#) for related policies.
- **UC Authorized/Restricted Call List and Call Log (Form S-20):** This instrument is used by case managers to create a list of authorized and restricted contacts to ensure safe communication for the UC and document the details of phone calls made by a UC.
- **Home Study/Post-Release Service (HS/PRS) Primary Provider Entity (Form S-21A):** This instrument is used by grantee HS/PRS providers to add identifying information about their organization into the UC Path system. Each organization only needs to be created once. Field values may be updated as often as needed.
- **Home Study/Post-Release Service (HS/PRS) Subcontractor Entity (Form S-21B):** This instrument is used by grantee HS/PRS providers to add identifying information about their sub-grantees into the UC Path system and link them to their HS/PRS Primary Provide Entity

record. Each organization only needs to be created once. Field values may be updated as often as needed.

- **Home Study/Post-Release Service (HS/PRS) Primary Provider Profile (Form S-21C):** This instrument is used by HS/PRS providers to add identifying information about caseworkers employed by their organization. Each organization only needs to be created once. Field values may be updated as often as needed.
- **Home Study/Post-Release Service (HS/PRS) Subcontractor Profile (Form S-21D):** This instrument is used by HS/PRS providers to add identifying information about caseworkers employed their sub-grantee organizations. Each organization only needs to be created once. Field values may be updated as often as needed.
- **Post-Release Service (PRS) Event (Form S-22):** This instrument is used by post-release service caseworkers to document referrals made and services provided at critical junctures of service provision, such as 14 day, 6 month, 12 month, and closure. The instrument contains auto-populated sponsor information and areas to document information about the HS/PRS provider, reason for referral, the minor's placement and safety status, and services areas addressed. See [ORR Policy Guide Section 6.2 Post Release Services](#) for related policies.
- **Case Manager Call Log and Case Notes (Form S-23):** This instrument is used by case managers to log any contact (in-person, phone, video, social media, or mail) they make in relation to the UC's case, including any related notes.
- **Sponsor Application (Form S-24):** This instrument is used by care providers to document certain information and milestones in the sponsor application process. See [ORR Policy Guide Section 2.2. Sponsor Application Process](#) for related policies.
- **Ohio Youth Assessment System (OYAS) Reentry Tool:** This instrument was created by the University of Cincinnati Corrections Institute and consists of an Interview Guide, Self-Report Questionnaire, and Score Sheet. The tool is a risk/needs assessment used by case managers in secure and staff secure facilities to assess UC for readiness to transition into the community and measure the UC's progress while in ORR custody.

3. Use of Improved Information Technology and Burden Reduction

ORR is in the process of developing a new case management system which will streamline information management by consolidating UC information from disparate storage locations, reduce manual paperwork processing conducted outside of the system (e.g., spreadsheets, PDFs, Word documents), maximize the use of auto-population so that information is not entered more than once, enforce business rules through automated workflow management, and improve business intelligence capabilities by automating reporting and data analytics. All of the instruments in this collection will be incorporated into the new system when launched except for one. The *Child Advocate Recommendation and Appointment* will be converted from a Word to a PDF form; it will be incorporated into UC Path at a later time.

4. Efforts to Identify Duplication and Use of Similar Information

The information being collected by these instruments 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 on these forms would impede ORR from performing its charged duty of providing required services to UC and releasing UC from its custody as quickly and safely as possible. Furthermore, all grantees funded to provide services to these children are required in writing to comply with all of ORR's program 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 February 25, 2021, Volume 86, Number 36, pages 11537-11541, and provided a sixty-day period for public comment. During the notice and comment period, responses were received from four commenters, each containing multiple comments. Attachment A provides a summary of those comments and ORR's responses.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift to the respondents will be provided.

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 was published on July 18, 2016 at 81 FR 46682.

11. Justification for Sensitive Questions

Sensitive information is collected on the forms in order for ORR to provide appropriate services to UC 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

Estimates used to calculate burden are based on the following factors:

- The number of responses per respondent was calculated using FY2019 data on the actual number of responses for existing instruments.
- FY2021 projections for referrals to ORR custody and discharges from ORR custody.
- ORR funds approximately 216 care provider grantees, including approximately 30 long term foster care programs, 15 restrictive placement programs, and 60 home study and post-release service grantees and sub-grantees.
- The cost to respondents was calculated using wage data, accessed in March 2020, for the Bureau of Labor Statistics (BLS) job code 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 – $\$19.21 \times 2 = \38.42

| Information Collection Title | Annual Number of Respondents | Annual Number of Responses per Respondent | Average Burden Minutes per Response | Annual Total Burden Hours | Average Hourly Wage | Annual Total Cost |
|---|------------------------------|---|-------------------------------------|---------------------------|---------------------|-------------------|
| Sponsor Assessment (Form S-5) | 216 | 265 | 60 | 57,240 | \$38.42 | \$2,199,160.80 |
| Home Study Assessment (Form S-6) | 60 | 81 | 45 | 3,645 | \$38.42 | \$140,040.90 |
| Adult Contact Profile (Form S-7) | 216 | 1324 | 45 | 214,488 | \$38.42 | \$8,240,628.96 |
| Initial Intakes Assessment (Form S-8) | 216 | 278 | 20 | 20,016 | \$38.42 | \$769,014.72 |
| Assessment for Risk (Form S-9) | 216 | 556 | 45 | 90,072 | \$38.42 | \$3,460,566.24 |
| UC Assessment (Form S-11) | 216 | 278 | 120 | 120,096 | \$38.42 | \$4,614,088.32 |
| UC Case Review (Form S-12) | 216 | 556 | 120 | 240,192 | \$38.42 | \$9,228,176.64 |
| Individual Service Plan (Form S-13) | 216 | 694 | 20 | 49,968 | \$38.42 | \$1,919,770.56 |
| Long Term Foster Care Travel Request (Form S-14) | 30 | 8 | 20 | 80 | \$38.42 | \$3,073.60 |
| Child Advocate Recommendation and Appointment (Form S-15) | 216 | 5 | 15 | 270 | \$38.42 | \$10,373.40 |
| Thirty Day Restrictive Placement Case Review (Form S-16) | 15 | 67 | 45 | 754 | \$38.42 | \$28,968.68 |
| Admission (Form S-18) | 216 | 278 | 20 | 20,016 | \$38.42 | \$769,014.72 |
| Home Study/Post-Release Service (HS/PRS) Referral (Form S-19) | 216 | 68 | 20 | 4,896 | \$38.42 | \$188,104.32 |
| UC Authorized/Restricted | 216 | 6981 | 5 | 125,658 | \$38.42 | \$4,827,780.36 |

| | | | | | | |
|--|-----|------|----|------------------|-------------------------------------|------------------------|
| Call List and Call Log (Form S-20) | | | | | | |
| Home Study/Post-Release Service (HS/PRS) Primary Provider Entity (Form S-21A) | 9 | 1 | 5 | 1 | \$38.42 | \$38.42 |
| Home Study/Post-Release Service (HS/PRS) Subcontractor Entity (Form S-21B) | 51 | 1 | 5 | 4 | \$38.42 | \$153.68 |
| Home Study/Post-Release Service (HS/PRS) Primary Provider Profile (Form S-21C) | 9 | 13 | 5 | 10 | \$38.42 | \$384.20 |
| Home Study/Post-Release Service (HS/PRS) Subcontractor Profile (Form S-21D) | 51 | 13 | 5 | 55 | \$38.42 | \$2,113.10 |
| Post-Release Service (PRS) Event (Form S-22) | 60 | 968 | 60 | 58,080 | \$38.42 | \$2,231,433.60 |
| Case Manager Call Log and Case Notes (Form S-23) | 216 | 8426 | 5 | 151,668 | \$38.42 | \$5,827,084.56 |
| Sponsor Application (Form S-24) | 216 | 265 | 60 | 57,240 | \$38.42 | \$2,199,160.80 |
| Ohio Youth Assessment System (OYAS) Reentry Tool | 15 | 101 | 75 | 1,894 | \$38.42 | \$72,767.48 |
| Estimated Annual Burden Hours Total: | | | | 1,216,343 | Estimated Annual Cost Total: | \$46,731,898.06 |

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

Respondents will not incur any direct monetary costs, other than their time, in the completion of these instruments.

14. Annualized Cost to the Federal Government

The annualized cost estimate for each of these instruments considers the time of a step 1 GS-12 in the Washington, DC locality to review information 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.

| Information Collection Title | Annual Number of Respondents | Annual Number of Responses per Respondent | Average Federal Staff Burden <u>Minutes</u> | Annual Total Federal Staff Burden | Average Federal Staff Hourly Wage | Annual Total Federal Staff Cost |
|------------------------------|------------------------------|---|---|-----------------------------------|-----------------------------------|---------------------------------|
|------------------------------|------------------------------|---|---|-----------------------------------|-----------------------------------|---------------------------------|

| | | | per Response | <u>Hours</u> | | |
|---|----|-------|-----------------|--------------|---------|------------------|
| Sponsor Assessment (Form S-5) | 45 | 1,271 | 30 | 1,715,850 | \$82.74 | \$141,969,429.00 |
| Home Study Assessment (Form S-6) | 45 | 108 | 30 | 145,800 | \$82.74 | \$12,063,492.00 |
| Adult Contact Profile (Form S-7) | 45 | 6,356 | 20 | 5,720,400 | \$82.74 | \$473,305,896.00 |
| Initial Intakes Assessment (Form S-8) | 45 | 1,333 | 10 | 599,850 | \$82.74 | \$49,631,589.00 |
| Assessment for Risk (Form S-9) | 45 | 2,667 | 10 | 1,200,150 | \$82.74 | \$99,300,411.00 |
| UC Assessment (Form S-11) | 45 | 1,333 | 30 | 1,799,550 | \$82.74 | \$148,894,767.00 |
| UC Case Review (Form S-12) | 45 | 2,667 | 20 | 2,400,300 | \$82.74 | \$198,600,822.00 |
| Individual Service Plan (Form S-13) | 45 | 3,333 | 5 | 749,925 | \$82.74 | \$62,048,794.50 |
| Long Term Foster Care Travel Request (Form S-14) | 45 | 6 | 10 | 2,700 | \$82.74 | \$223,398.00 |
| Child Advocate Recommendation and Appointment (Form S-15) | 45 | 23 | 5 | 5,175 | \$82.74 | \$428,179.50 |
| Thirty Day Restrictive Placement Case Review (Form S-16) | 45 | 22 | 15 | 14,850 | \$82.74 | \$1,228,689.00 |
| Admission (Form S-18) | 45 | 1,333 | 20 | 1,199,700 | \$82.74 | \$99,263,178.00 |
| Home Study/Post-Release Service (HS/PRS) Referral (Form S-19) | 45 | 329 | 10 | 148,050 | \$82.74 | \$12,249,657.00 |
| UC Authorized/Restricted Call List and Call Log (Form S-20) | 45 | 1,156 | 10 | 520,200 | \$82.74 | \$43,041,348.00 |
| Post-Release Service (PRS) Event (Form S-22) | 45 | 1,290 | 20 | 1,161,000 | \$82.74 | \$96,061,140.00 |
| Case Manager Call Log and Case Notes (Form S-23) | 45 | 1,156 | 10 | 520,200 | \$82.74 | \$43,041,348.00 |
| Sponsor Application (Form S-24) | 45 | 1,271 | 10 | 571,950 | \$82.74 | \$47,323,143.00 |
| Ohio Youth Assessment System (OYAS) Reentry Tool | 45 | 34 | 20 | 30,600 | \$82.74 | \$2,531,844.00 |

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|---|-------------------|---|---------------------------|
| Estimated Annual Burden Hours Total: | 18,506,250 | Estimated Annual Cost Total: | \$1,531,207,125.00 |
|---|-------------------|---|---------------------------|

15. Explanation for Program Changes or Adjustments

A. ORR revised 11 instruments currently approved under OMB #0970-0553 and plans to add 11 new instruments to this collection. All instruments will be incorporated into ORR’s new case management system, UC Path. In addition, ORR plans to remove one currently approved instrument from this collection. Finally, ORR plans to replace the term “unaccompanied alien child (UAC)” with “unaccompanied child (UC)” throughout the instruments in this collection. Note that the screenshots of UC Path instruments attached to this package do not reflect this change because it has not yet been developed in the system. However, the revision in terminology will be made before the system is launched.

- **Sponsor Assessment (Form S-5):** ORR reformatted and reorganized the instrument and changed reworded some of the fields. In addition, ORR made the following revisions:
 - In the “Sponsor Basic Information” section, added the field “Relationship to UC”.
 - In the “Family Relationships” section, added the field “Home Address” and removed the field “Are you married to your partner?”
 - In the “Household Composition” section, removed the field “Valid Identity Document Received”.
 - In the “Previous Sponsorship” section, removed the field “How many children did you sponsor?” and added the following fields: “What contact do you still have with the child?”, “What is the child’s current legal status?”, and “HHM/AACG Name”.
 - In the “Proof of Identity” section, removed the following fields: “Sponsor’s identity is verified”, “Household member’s identity is verified”, “Adult Caregiver’s identity is verified”, and “Additional information on identity”.
 - In the “Proof of Immigration Status or U.S. Citizenship” section, added the following fields: “Proof of Immigration Document Type”, “Expiration Date”, “Date Documents Issued”, and “Verified by Government Agency or Consulate”.
 - In the “Proof of Address” section, added the field “Alternate Phone” and removed the following fields: “Work Phone”, “Fax”, “Describe the area/neighborhood where you reside”, “Do you receive your mail at a different address?”, “If yes, what is the address that you use to receive mail?”, and “Resided at Address Within Past 5 Years”.
 - In the “Proof of Financial Stability” section, added the following fields: “List Proof of Financial Stability documents provided”, “Proof of Financial Stability Document Type”, and “Date Document Issued”.
 - In the “Care Plan” section, added the fields “Are you aware of any mental health conditions of the UC which will need treatment?” and “Explain how you plan to supervise and ensure the safety of the UC” and removed eight other fields.
 - Removed the “Safety Plan” section.

- In the “Supervision Plan” section, removed the fields “SSN/A No.” and “Explain how you plan to supervise the minor”.
- In the “Alternate Adult Caregiver Plan” section, removed the field “SSN/A No.”.
- In the “Self-Disclosed Criminal History” section, added the fields “Conviction” and “List any child abuse and neglect history” and removed six other fields.
- In the “Sponsor’s Knowledge of UC Journey and Apprehension” section, added the field “If there is a debt still owed for the UC’s journey, please explain”.
- In the “Human Trafficking” section, added the fields “If you have travelled back to your country of origin since your arrival in the U.S., please explain” and “Were you ever restricted from quitting or leaving the work?” and removed 16 other fields.
- **Home Study Assessment (formerly titled Home Study Report) (Form S-6):** ORR reformatted and reorganized the instrument and changed reworded some of the fields. In addition, ORR made the following revisions:
 - In the “UC Background” section, removed the question related to the UC’s understanding of certain U.S. laws. Questions about how sponsor disciplines children and whether UC would feel safe living with sponsor were replaced with a single question asking if the UC has any concerns about living with sponsor.
 - In the “Sponsor’s Motivation and Relationship to UC” section, replaced the question on the location of the sponsor’s family members in the U.S. and their relationship to the UC with a question asking if the sponsor has a family support system in the U.S. and whether they can provide assistance.
 - In the “Household Members” section, removed fields related to background checks because this information is documented by case managers elsewhere in UC Path.
 - In the “Summary” section, removed the risk factors and protective factors table.
- **Adult Contact Profile (formerly titled New Sponsor) (Form S-7):** The purpose of this instrument has been expanded; it now acts as a hub where users can access all records related to a sponsor, adult household member, or alternate adult caregiver. The average burden minutes per response was increased from 20 to 45 minutes. In addition, ORR made the following revisions:
 - Replaced the “UC Basic Information” section with the “Associated UCs” table.
 - Removed the following fields: “SSN”, “Country of Residency”, “Query ID”, “Does anyone in the Household have a Serious Contagious Disease?”, and “Do any of the Occupants Have Criminal Convictions or Charges, Other Than Minor Traffic Violations?”.
 - Added the following fields: “AKA”, “Current Age”, “Primary Language Spoken”, “Other Spoken Languages”, “Additional Cultural Information”, and “Legacy Address”.
 - Replaced the fields related to address and address flags with the “Address History” section.
 - Moved the information from the “Affidavits of Support” table to the *Sponsor Assessment*.

- **Initial Intakes Assessment (Form S-8):** ORR reformatted and reorganized the instrument and changed reworded some of the fields. The average burden minutes per response was increased from 15 to 20 minutes. In addition, ORR made the following revisions:
 - In the “Information” section, removed the field “Date of departure from home country” and added the following fields: “City of Birth”, “Neighborhood of Birth”, “Religious Affiliation”, “Other Languages Spoken”, “Who did UC live with before placement?”
 - Replaced the “Family Information” section with the “Family and Friends” and “Adult Contact Relationships” sections.
 - Added new “Significant Information” section, containing six fields.
 - In the “Medical” section, replaced or reworded most fields and expanded the fields related to allergies into multiple fields.
 - Added a new “Medication Overview” section, containing three fields.
 - Revised the available fields in the “Observable or Reported Medical Concerns” section.
 - Reduced the number of fields in the “Mental Health” section to three.
- **Assessment for Risk (Form S-9):** ORR reformatted and reorganized the instrument and changed reworded some of the fields. In addition, ORR added several fields related to the UC’s sexual history and two fields on mental and physical disability and illness. The average burden minutes per response was increased from 30 to 45 minutes.
- **UC Assessment (Form S-11):** ORR reformatted and reorganized the instrument and changed reworded some of the fields. The average burden minutes per response was increased from 45 minutes to 2 hours. In addition, ORR made the following revisions:
 - Added a new “Age-determination or Identity Concern” section, containing 11 fields.
 - In the “Additional UC Information” section, added the following fields: “City of Birth”, “Who did UC live before placement”, “Neighborhood of Birth”, and “Other additional information”.
 - In the “Family and Friends” section, removed “Has family in Country of Origin?”, “Has Family in the US?” fields. Replaced “Family in Country of Origin” and “Family and Friends in the U.S.” tables with a “Family and Friends” table. Added “Separated from Parents/Legal Guardian?” and “Migrant Protection Protocol case?” fields.
 - Removed the “Medical History” and “Medication Table” from the “Medical” section and added the field “Health care needs are being addressed”.
 - Moved fields in the “Legal” section to the *UC Profile* and *UC Legal Information* instruments found in other ORR information collections.
 - Removed all fields from the “Criminal” section and replaced them with twonew fields and an area to provide details on any criminal charges (nine fields).
 - Removed the “Mental Health/Behavior” section because that information is available in the mental health area of UC Path.

- In the “Sponsor Information” section, replaced the table with the “Adult Contact Relationship” table and added a section that displays “Previous Sponsor Applications”.
- Added a “Documents” section in which documents directly related to case management may be uploaded.
- In the “Certification” section, created separate areas for both the clinician and case manager to certify that all required sections of the instruments are complete and accurate and added “Translator Name” and “Language” fields.
- **UC Case Review (Form S-12):** ORR reformatted and reorganized the instrument and changed/reworded some of the fields. The average burden minutes per response was increased from 30 to 2 hours. In addition, ORR made the following revisions:
 - Added a new “Age-determination or Identity Concern” section, containing 11 fields.
 - Created a new “Additional UC Information” section and added the following fields: “UC Case Review Type”, “Who did UC live with before placement?”, “City of Birth”, “Religious Affiliation”, “Neighborhood of Birth”, “Separated from Parents/Legal Guardian?”, and “Parent Separation Case Updates”.
 - In the “Medical” section, added a new “Health care needs are being addressed” field and a table of “Existing Mental Health Diagnoses” that is auto-populated from information entered into the mental health area of UC Path.
 - Removed the “Medical History” and “Medication Table” from the “Medical” section.
 - In the “Mental Health” section, removed the fields under “Psychological Evaluation” and added the following fields: “Date Completed”, “Date of Evaluation”, and “Evaluator”.
 - Added a new “Case Plan” section, containing seven fields.
 - Moved fields in the “Legal” section to the *UC Profile* and *UC Legal Information* instruments found in other ORR information collections.
 - In the “Sponsor Information” section, replaced the table with the “Adult Contact Relationship” table and added a section that displays “Previous Sponsor Applications”.
 - Added a new “Criminal” section (two fields) and an area to provide details on any criminal charges (nine fields).
 - Added a “Documents” section in which documents directly related to case management may be uploaded.
 - Removed the “Recommendations” and “Care Plan” sections.
 - In the “Certification” section, created separate areas for both the clinician and case manager to certify that all required sections of the instruments are complete and accurate and added “Translator Name” and “Language” fields.
- **Individual Service Plan (Form S-13):** ORR revised the formatting and reworded some of the fields. In addition, ORR added the following fields: “Contract Number”, “Individual Service Plan”, “Entity Name”, “Notes”, “List Team Members who Contributed to ISP”, “Translator Name”, and “Language”. In addition, ORR added an area where documents

directly related to the service plan may be uploaded. The average burden minutes per response was increased from 15 to 20 minutes.

- **Long Term Foster Care Travel Request (Form S-14):** ORR revised the formatting and reworded some of the fields. In addition, ORR added the following fields: “Status”, “Transportation Notes”, “Policy #”, “Remand for Further Information”, and “ORR Decision”. The average burden minutes per response was increased from 15 to 20 minutes.
 - **Child Advocate Recommendation and Appointment (Form S-15):** ORR reformatted and reorganized the instrument and changed reworded some of the fields. No changes were made to the content.
 - **30 Day Restrictive Placement Case Review (formerly titled Summary Notes: Thirty Day Restrictive Placement Case Review) (Form S-16):** ORR revised the formatting and added the following fields: “Out-of-Network RTC Provider”, “Case Manager Name”, “Case Coordinator Name”, “FFS Name”, “Name and Title”, and “Date”.
 - **Admission (Form S-18):** This is a new instrument that ORR plans to add to this collection.
 - **Home Study/Post-Release Service (HS/PRS) Referral (Form S-19):** This is a new instrument that ORR plans to add to this collection.
 - **UC Authorized/Restricted Call List and Call Log (Form S-20):** This is a new instrument that ORR plans to add to this collection.
 - **Home Study/Post-Release Service (HS/PRS) Primary Provider Entity (Form S-21A):** This is a new instrument that ORR plans to add to this collection.
 - **Home Study/Post-Release Service (HS/PRS) Subcontractor Entity (Form S-21B):** This is a new instrument that ORR plans to add to this collection.
 - **Home Study/Post-Release Service (HS/PRS) Primary Provider Profile (Form S-21C):** This is a new instrument that ORR plans to add to this collection.
 - **Home Study/Post-Release Service (HS/PRS) Subcontractor Profile (Form S-21D):** This is a new instrument that ORR plans to add to this collection.
 - **Post-Release Service (PRS) Event (Form S-22):** The field labels in the “Service Area” section were revised.
 - **Case Manager Call Log and Case Notes (Form S-23):** This is a new instrument that ORR plans to add to this collection.
 - **Sponsor Application (Form S-24):** This is a new instrument that ORR plans to add to this collection. After publication of the 60-day Federal Register Notice, ORR reorganized the Background Checks data entry section of this instrument and removed the following fields: “Date ARI Form Uploaded,” “Days from Offered to Accepted,” and “Days from Accepted to Occurred.”
 - **Ohio Youth Assessment System (OYAS) Reentry Tool:** No changes were made to this instrument.
 - **UC Case Status:** ORR is discontinuing this instrument.
- B. ORR plans to remove the term “alien” from the title of this information collection and revise it to read “Services Provided to Unaccompanied Children.”
- C. ORR intends to conduct a phased rollout of the UC Path system. Beginning Fall 2021, ORR plans to roll the UC Path system out to a small group of care provider programs. ORR will gradually

expand use of the system to other programs and expects all care provider programs will be using UC Path by Spring 2022. To ensure continuity of operations, care provider programs will need the ability to continue using instruments in the UC Portal system and in other formats (e.g., PDF, Excel) while they are waiting to transition over to the UC Path system. Therefore, ORR requests OMB's approval to continue use of the following instruments, concurrently with the UC Path versions of the same instruments until all care provider programs are using UC Path. Although all care providers are expected to be using UC Path by Spring 2022, ORR requests approval to continue using these instruments for up to one year to account for any unexpected technical issues that may arise during rollout. These versions were last approved by OMB on March 10, 2021.

- Sponsor Assessment (Form S-5) – Word
- Home Study Report (Form S-6) – Word
- New Sponsor (Form S-7) – UC Portal
- Initial Intakes Assessment (Form S-8) – UC Portal
- Assessment for Risk (Form S-9) – UC Portal
- UC Assessment (Form S-11) – UC Portal
- UC Case Review (Form S-12) – UC Portal
- Individual Service Plan (Form S-13) – UC Portal
- Long Term Foster Care Travel Request (Form S-14) – UC Portal

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 for all forms except the Ohio Youth Assessment System (OYAS) Reentry Tool. This tool is owned by the University of Cincinnati Corrections Institute and ORR does not have permission to alter the tool.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.

