

THE SUPPORTING STATEMENT

Specific Instructions

Please do not remove or alter the headings below

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF), Office of Refugee Resettlement (ORR) is submitting several instruments directly related to the care and placement of unaccompanied alien children in Federal custody for processing pursuant to § 1320.05 of the Paperwork Reduction Act. The proposed instruments are the following: 1) the Sponsor's Agreement to the Conditions of Release (ORR R-420 & ORR R-420s); 2) the Verification of Release (ORR R-535); 3) the Family Reunification Packet (ORR FRP-081); 4) Authorization for Release of Information (ORR R-317 & R-317s). These forms have been previously approved by ACF, HHS, and OMB but are set to expire in July 2011 and are therefore being resubmitted before their OMB clearance expires. Some minor changes have been made to the forms which will be detailed in other sections of this supporting statement.

The original version of the forms were approved by OMB in June 2005, and renewed again in July 2008 with no changes.

The ACF/ORR functions related to the care and placement of unaccompanied alien children were transferred from the former INS pursuant to § 462 of the Homeland Security Act, 6 U.S.C. 279. The standards of care relating to unaccompanied alien children in Federal custody were established by the Flores v. Reno Settlement Agreement, No. CV85-4544-RJK (C.D. Cal. 1996). The Department of Homeland Security (DHS) retains the responsibility of immigration benefits and enforcement. Though the responsibility of these functions to ACF was formally transferred on March 1, 2003, the assumption of these functions has been a gradual process. Flores provides that ACF/ORR is to release unaccompanied alien children, when appropriate, to custodial sponsors who agree to provide for their mental, physical, and financial well-being, to ensure their attendance at immigration hearings, and to comply with removal proceedings if so ordered. Non-compliance with the terms of the settlement allows for the Flores class counsel to compel enforcement. Pursuant to a Statement of Principles between DHS and the Department of Health and Human Services (HHS) both recognized the provisions established by the Flores, including a general policy favoring placement of a unaccompanied alien child (UAC) with family members, or individuals designated by the UAC's parents or legal guardians as an alternative to shelter or secure-detention environments.¹ The instruments used by the former INS unaccompanied alien children's program, use of which were employed during the transition period, did not collect: 1) an affirmation of the requesting sponsor to terms of the custodial release pursuant to Flores; 2) information related to the sponsor's ability to provide for the physical and mental well-being.

Following the transfer of functions and prior to August 2, 2004, unaccompanied alien children were reunified with requesting sponsors at DHS offices. DHS employed the use of the Order of Release on Recognizance (INS I-220A), which authorized the release and was carried by the UAC as proof of release from ORR custody. DHS/Customs and Border Protection (CBP) and Immigration and Customs Enforcement (ICE) recognized the I-220A as such proof in the event a UAC was subsequently encountered in the field. Furthermore, the I-220 authorized release from INS and not ORR.

Under the Homeland Security Act, the consideration for children's safety from smugglers,

¹ See Statement of Principles, Dated April 6, 2004

traffickers or others who might seek to victimize or otherwise engage them in criminal, harmful, or exploitive activity must be taken into account when making a placement determination.² The former INS performed investigative background checks on the sponsor requesting release during the reunification process. During the transition period, DHS performed these checks on these sponsors. As of August 2, 2004, DHS ceased its performance of background checks on sponsors and also the physical release from custody.³ In 2008, Congress passed, and the President signed the William Wilberforce Trafficking Victims Protection Reauthorization Act (“TVPRA of 2008”). §235 of the TVPRA of 2008 creates additional requirements for the placement, care, and release, for UAC in federal custody. §235(c)(4) establishes a new pro-bono program for sponsors that will effect the forms under review.

These proposed information collections will assist ACF/ORR achieve compliance with the Act, the TVPRA of 2008, and Flores in regards to the family reunification procedures of unaccompanied alien children.

The form’s ORR numbers have also been changed for the Sponsor’s Agreement to Conditions of Release from ORR R-420/420s to ORR R-1; for the Verification of Release from ORR R-535 to ORR R-2; and for the Family Reunification Packet from ORR FRP-081 to ORR R-4/R-4s. Due to the current use of the Authorization for Release of Information ORR R-317/317s no change to that form’s number has been made.

The cited statutes and documents are included with this package.

2. Purpose and Use of the Information Collection

Sponsor’s Agreement (ORR R-1/R-1s formerly ORR R-420 & ORR R-420s)

The proposed Sponsor’s Agreement to the Conditions of Release requests the affirmation of the potential sponsor to the terms of the release pursuant to the Flores settlement agreement and also the acknowledgement of the receipt of a UAC’s Notice to Appear (I-862). Following the collection of the affirmation, it is sent electronically to ORR headquarters for review. There is also a corresponding Spanish language version to allow linguistic accessibility for non-English/Spanish-proficient potential sponsors. The expected respondents of this instrument are adults requesting the release of unaccompanied alien children in ORR custody to their custody. The Sponsor’s Agreement contains a list of conditions that a sponsor is promising to uphold after ORR transfers custody of a UAC into the sponsor’s custody.

In December 2010, after meetings with DHS/ICE, that agency asked to be removed from the Sponsor’s Agreement’s reporting requirement conditions. DHS/ICE did ask ORR to keep the condition related to ensuring the appearance of the child at immigration hearings. Additionally, as a result of the TVPRA of 2008, the Department of Justice/Executive Office of Immigration Review was asked to create Legal Orientation Program’s for Custodians (“LOPCs”). ORR has asked that sponsors who are live in a metropolitan area where a LOPC is available to attend these programs.

For the time being the Conditions of Release will not differ much from how it was written in the past. ORR is currently in the process of making updates to the form which will be

² 6 U.S.C. 279(b)(2)

³ See Immigrations and Customs Enforcement Memo, Dated July 29, 2004

published at a later date. ORR is unable to include these changes in this extension because the updates to the form are closely tied to a draft Notice of Proposed Rulemaking that continues to be internally deliberated.

Verification of Release (ORR R-2/R-2s formerly ORR R-535)

The proposed Verification of Release requests the UAC's acknowledgement of the terms of custodial release with respect to reporting to DHS and Executive Office for Immigration Review (EOIR) as necessary for immigration proceedings. The instrument also will serve as the official document verifying the release of a UAC from ORR custody. This document will be carried by the UAC as proof of release from ORR custody, replacing the Order of Release on Recognizance (I-220A). After the collection of the affirmation, it is sent electronically to ORR headquarters for review. The expected respondents of this instrument are unaccompanied alien children in ORR custody.

Family Reunification Packet (ORR R-4/R-4s formerly FRP-081 & FRP-081s)

The proposed Family Reunification Packet collects information related to the potential sponsor's ability to provide for the UAC's mental and physical well-being. The information collected will be used by ORR to determine the suitability of a sponsor as a custodian of a UAC. After the information is collected, it is sent electronically to ORR headquarters for review. The expected respondents of this instrument are adults requesting the release of unaccompanied alien children in ORR custody to their custody.

This form contains a checklist of documents that ORR requires a sponsor to submit to a care provider and to ORR that will verify the sponsor's address, identity, immigration status, background information, and other information. This checklist has changed slightly from previous years, and the new checklist reflects those updates.

The following changes were made to the Family Reunification Packet: ORR asks in addition to criminal background/social service questions, that a sponsor or a sponsor's household member present official documents explaining the incident as well as presenting documents proving that the matter has been disposed of; ORR asks that sponsor's identify who will be providing short-term supervision of the UAC when the sponsor is unable to (like after school, or work); a sponsor's supervision plan in the event the sponsor voluntarily or involuntarily leaves the United States (if the sponsor goes overseas, or is deported); ORR asks who will be providing medical services for UAC. Additionally, the layout of the acceptable documents in the form has been rearranged to match other pages of the form and to be more easily readable.

Changes to the Family Reunification Packet's checklist include: acceptance as a form of identity an identification document from the sponsor's country of origin; a requirement that the sponsor provide a birth certificate or copy of a birth certificate; for proof of address a letter from the sponsor's landlord is allowed in addition to a copy of a lease, or mortgage statement; for evidence of financial support a sponsor may send in a letter explaining their self-employment; a declaration of immigration status; and finally a provision where the sponsor signs stating that supporting documents are valid and not fraudulent.

Additionally, The FRP-081 has been revised to have an English only version and a Spanish version, previously the form had English and Spanish provisions written directly into the form itself.

Authorization for Release of Information (ORR R-317 & ORR R-317s)

The proposed Authorization for Release of Information collects respondents' affirmation of consent to background investigations and information to allow for ACF/ORR to make a determination of whether the UAC will be safe in the custody of the sponsor. There is also a corresponding Spanish language version to allow linguistic accessibility for non-English/Spanish-proficient potential sponsors. The expected respondents of this instrument are adults requesting the release of unaccompanied alien children in ORR custody to their custody. This form has been updated in order to more accurately define what parties may be privy to the information collected. Additionally, this form more fully protects ORR to disclose information needed from a potential sponsor in order to conduct background checks, child abuse and neglect checks. The changes do not change who may be able to assess information (the process itself remains the same) but after consultation with security specialist staff, OGC attorneys, and the ACF Privacy Officer, ORR has determined that adding the types of persons able to assist in the background investigation.

ORR has made the following changes to the Authorization for Release of Information: the terms "employee", "contractor", and "grantee" of ORR have been included to the list of authorized persons to conduct a background check on a sponsor; ORR explains that the results of the background investigation are the "property of ORR," and finally, the form now has a "relinquishment of claim or right" clause that the sponsor acknowledges. The relinquishment clause is important because some state agencies were reluctant to provide ORR important information that could impact a sponsor's suitability to sponsor a child without a signed relinquishment of rights. Furthermore, a new clause was inserted that allows ORR to share information collected during the family reunification process with other employees of the federal government (important for connecting sponsor's with DOJ's Legal Orientation for Custodian's program); contractors (such as the Child Advocate program); and grantees (facility staff who may need to contact the sponsor for other reasons).

3. Use of Improved Information Technology and Burden Reduction

ACF/ORR has consulted with DHS, the EOIR, HHS General Counsel, and the Voluntary Agencies (VOLAGS) over the course of the development of these instruments to minimize the burden of collection to the potential respondents and to effectively achieve compliance with the Homeland Security Act, the TVPRA of 2008, and Flores. Electronic means of collecting this information was considered during the development of these proposed instruments. However, the access to adequate information technology to collect the information could not be assumed, hence the reliance on paper-based formats. Generally, the sponsors who will be filling out these documents lack access to computers and usually are not computer literate, therefore ORR has determined that filing the forms by hand is the best method to complete the forms.

4. Efforts to Identify Duplication and Use of Similar Information

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

5. Impact on Small Businesses or Other Small Entities

The proposed information collections will not burden or impact small businesses. In the event that an entity comes forward to request a UAC as the custodial sponsor, the requested information is at the minimum for intended use.

6. Consequences of Collecting the Information Less Frequently

The lack of these instruments would impede ACF/ORR from performing its charged duty of making care and placement determinations for unaccompanied alien children in its care. Under Flores, ORR may not release a UAC to a sponsor who has not agreed to provide for their mental, physical, and financial well-being, to ensure their attendance at immigration hearings, and to comply with removal proceedings if so ordered. This is covered by the Sponsor's Agreement. To ensure the unaccompanied alien children's attendance of their immigration proceedings, ACF/ORR needs to collect their acknowledgment of the conditions of their release. This is captured in the Verification of Release. In order to make a determination regarding the suitability of a requesting sponsor, ACF/ORR needs to collect the information as requested in the Family Reunification Packet and the Authorization for Release of Information. These proposed instruments are necessary for the continuous function of the family reunification process for releasing unaccompanied alien children from ACF/ORR custody. These documents only need to be collected once (per child). Though exact figures are hard to come by overwhelming most sponsor's only sponsor one child (except for rare circumstances where there is a sibling group). Therefore, for the overwhelming number of sponsors the signing and filing of the forms is the only time they will be in contact with ORR.

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

These proposed information collections will not entail any special handling procedures as indicated in the OMB guidance for Paperwork Reduction Act processing.

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

ACF/ORR has consulted with DHS, the EOIR, HHS General Counsel, and the Voluntary Agencies (VOLAGS) over the course of the development of these instruments to minimize the burden of collection to the potential respondents. ACF published a notice for comment in the Federal Register for processing for these proposed information collections on November 2, 2010 Volume 75, Number 211 Page 67377-67378.

ORR received several questions from various legal organizations and several VOLAGS about the layout of the forms and what minor changes were being made to the forms during the first notice and comment period. ORR received three (3) public comments to the forms.

The first response was from an anonymous citizen who offered no material or thoughtful comment to the forms in question and so will be disregarded.

The second response came in the form of a letter from the United States Conference of Catholic Bishops offering three material comments to the forms.

The third response came in the form of an outline from the Lutheran Immigration and Refugee Services with several material comments to the form and some substantive thoughts on the information collection.

A memo has been attached detailing the comments and response to those comments to this supporting statement.

9. Explanation of Any Payment or Gift to Respondents

No provision or gift to the respondent will be provided.

10. Assurance of Confidentiality Provided to Respondents

ACF/ORR is in the process of establishing a new system of records to ensure the level of confidentiality pursuant to the Privacy Act, 5 U.S.C. 552(a). Official copies of the information collections will reside at ACF/ORR facilities and electronic copies will be circulated between the facilities and ACF/ORR offices. The SORN was recently pulled while it awaited the ACF Assistant Secretaries signature in order to update the SORN for compliance with the ORR/DUCS new database (unrelated to this information collection).

11. Justification for Sensitive Questions

ACF/ORR will not be asking for any information of a sensitive nature in these proposed instruments. In the Family Reunification Packet and the Authorization for Release of Information, ORR will ask for a social security number, but the submittal of this information is not mandatory. Facility staff will inform applicants that they are not required to submit a social security number, that submission is voluntary, and that the social security number will only be used for the verification of identity and to perform the background investigative check. If a requesting sponsor/respondent does not provide a social security number, ACF/ORR may be unable to complete the investigative background check.

12. Estimates of Annualized Burden Hours and Costs

ANNUAL BURDEN ESTIMATES

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Sponsor's Agreement to Conditions of Release	4,595	1	.25	1,148.75
Verification of Release	4,595	1	.25	1,148.75
Family Reunification Packet	4,595	1	1	4,595
Authorization for Release of Information	4,595	1	.25	1,148.75

Estimated Total Annual Burden per respondent Hours: 8,041.25

For FY '11, it is estimated that approximately 4595 sponsors will request the release of a UAC in ORR custody. Each sponsor must complete the Sponsor's Agreement, the Family Reunification Packet, and the Authorization for Release of Information. Each UAC will provide information for the Verification of Release. These instruments have been used in the field by ORR facilities and the estimates are drawn from the observed times of completion.

There are no third party disclosures for any of the family reunification forms.

ESTIMATED TOTAL OF BURDEN HOURS FOR ALL FAMILY REUNIFICATION FORMS:

8,041.25

The following tables show the cost associated with the burden hour. Our respondents we estimate make about \$7.25 an hour. This wage was calculated based on the average wage of unskilled or low skilled workers, which make up the vast majority of our respondents. Please note that the respondent for the Verification of Release is actually an unaccompanied alien child in ORR custody, they do not make a wage and therefore the monetary cost for their burden is \$0. Our record keepers not only file the documents sent to them by the respondents but also need time to explain the forms to the respondents which can take some time.

Sponsor's Agreement (ORR R-1/R-1s formerly ORR R-420 & ORR R-420s)

This instrument collects two items of information: 1) the affirmation to the conditions of the custodial release; 2) the acknowledgment of receiving the UAC's I-862. The estimated amount of time to complete both responses is approximately 15 minutes including the time to be informed of and understand the conditions of release. While the time involved with comprehending the terms of release will vary, the time involved with the acknowledgement of receiving the I-862 is assumed to be negligible.

Verification of Release (ORR R-2/R-2s formerly ORR R-535)

This estimate considers an approximate 15 minutes of time spent per Verification of Release coordinating the collection and the subsequent transmission of the information to ORR headquarters. There is no associated cost for the respondent to fill out the verification of release. The respondent in this case is an unaccompanied alien child in federal care and custody. Though there is a time burden for the form to be read and explained to the child there will be no cost on the respondent.

Family Reunification Packet (ORR R-4/R-4s formerly FRP-081 & FRP-081s)

This estimate considers an approximate 1 hour spent per Family Reunification Packet coordinating the collection and the subsequent transmission of the information to ORR headquarters. The respondents are sponsors of unaccompanied alien children. Calculating a wage for sponsors is difficult. However, most sponsors make minimum wage and this wage is used to determine the estimated. The 15 minutes of time needed for the record keeper to explain and file the document is calculated at \$14.00 which is the average hourly rate of an ORR/DUCS case worker.

The estimated time for the completion of the Family Reunification Packet is approximately 60 minutes, including the time necessary to gather and make copies of necessary documents. Several of the items request the provision of nominal information, such as names, contact information, addresses and telephone numbers. Copies of several documents are also requested. The more substantive items request information on the unaccompanied alien children's potential exposure to communicable diseases within the household where the UAC will reside.

Authorization for Release of Information (ORR R-317 & ORR R-317s):

The estimated time for completion of the Authorization for Release of Information is approximately 15 minutes. Several of the items request the provision of nominal information, such as names and places of residence. Other items request information which requires referencing personal immigration. It is estimated that a care provider case worker would need about 15 minutes to explain the form to the respondent.

This estimate considers an approximate 15 minutes of time spent per Sponsor’s Agreement coordinating the collection and the subsequent transmission of the information to ORR headquarters. This estimate considers an approximate 15 minutes of time spent per Verification of Release coordinating the collection and the subsequent transmission of the information to ORR headquarters.

Instrument	Number of Respondents	Hours spent per form	Cost of time per respondent (Wage pro-rated per quarter hour)	TOTAL ESTIMATED COST FOR RESPONDENTS
Sponsor’s Agreement to Conditions of Release	4,595	.25	\$1.81	\$8,316.95
Verification of Release	4,595	.25	\$0	\$0
Family Reunification Packet	4,595	1	\$7.25	\$33,313.75
Authorization for Release of Information	4,595	.25	\$1.81	\$8,316.95

Estimated Total Cost for Respondents: \$49,947.65

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

As for the respondents, there is the estimated one-time cost for the notarization associated with the completion of the Sponsor’s Agreement, with a national estimate for the notarization cost of \$15.00

With respect to the record keepers, none of these instruments required the acquisition of new contracted staff at ORR facilities, or the procurement of particular pieces of information technology. The technology employed for the electronic transmission of the instruments to ORR headquarters, such as personal computers with internet access, fax machines,

scanners, and copiers were already used by facilities prior to the change of these procedures. The costs associated with these instruments will be only ones associated with the operations and maintenance performed by existing staff at the ORR facilities. The time spent by the facility staff on these instruments will be incurred primary when providing guidance to requesting sponsors regarding the proper responses and the submitting of the instruments to ORR headquarters for review.

Sponsor’s Agreement (ORR R-1/R-1s formerly ORR R-420 & ORR R-420s)

ESTIMATE COST FOR RESPONDENTS

Est. Quantity of Sponsor’s Agreements	Notarization per Sponsor’s Agreement	Cost of Notarization	TOTAL ESTIMATED COST
4,595	1	\$15.00	\$68,925.00

Estimated cost for notarization: \$68,925.00

The Sponsor’s Agreement will take about 15 minutes for a respondent to read or have explained to them, and then signed. The respondent’s are sponsors of unaccompanied alien children. Calculating a wage for sponsors is difficult. However, most sponsors make minimum wage (\$7.25/hr) and this wage is used to determine the estimated (\$1.81 per quarter hour). Additionally, this document needs to be notarized, the average cost for notarization is \$15.00.

None of the other forms have outlay costs.

14. Annualized Cost to the Federal Government

Preparation of Instruments:

The creation of these documents was handled in 2004 by ORR Headquarters staff in conference with counterparts at DHS, EOIR, and with HHS OGC. The time spent on the creation of these instruments is difficult to account for because of the staffing needs. The time spent by ORR staff updating the forms in 2010 is also difficult to attain because of the disparate amount of time spent over a year long period.

Federal grantee/contractor care provider staff time is added to the annualized cost to the Federal Government, because the grantee/contractor care provider staff are working in place of a Federal official. These individuals are paid directly by Federal funds through their program’s grant, and their duties as record keepers are a responsibility required by State licensing regulations and specific guidance. After consultation with OMB, ORR was advised to have record keeper burden and costs allocated in Question 14 of this Supporting Statement.

The individuals who explain the forms and file the forms to respondents are ORR care provider case workers. The average salary of a care provider case worker is \$14.00. ORR determined this sum by averaging the salaries of case workers at several different facilities and rounding to the nearest dollar. Case Workers are generally college educated Bachelor degree holders with backgrounds in behavioral sciences (social work, sociology, psychology) or other related discipline. Case workers are responsible for both explaining the forms to the sponsors (and UAC in the case of the Verification of Release), and entering the completed forms in the UAC’s case file.

Sponsor’s Agreement (ORR R-1/R-1s formerly ORR R-420 & ORR R-420s)

It is estimated that a care provider case worker would need about 10 minutes to explain the form to the respondent, and 5 minutes to file a signed form in the UAC's case file.

Verification of Release (ORR R-2/R-2s formerly ORR R-535)

ORR estimates that it will take 15 minutes for the case worker to explain and file the document.

Family Reunification Packet (ORR R-4/R-4s formerly FRP-081 & FRP-081s)

ORR estimates that a care provider case worker would need about 55 minutes to explain the form to the respondent and another 5 minutes to file the form in a UAC case file.

Authorization for Release of Information (ORR R-317 & ORR R-317s):

ORR estimates that it will take approximately 10 minutes for a Case Worker to explain the document to a sponsor, and 5 minutes to file a signed Authorization for Release of Information.

Burden Estimates:

Instrument	Number of responses for Recordkeeper	Number of Responses per Respondent	Average Burden Hours per Recordkeeper	Total Burden Hours
Sponsor's Agreement to Conditions of Release	4,595	1	.25	1,148.75
Verification of Release	4,595	1	.25	1,148.75
Family Reunification Packet	4,595	1	1	4,595
Authorization for Release of Information	4,595	1	.25	1,148.75

Estimated Total Annual Burden per record keeper:

8,041.25

Cost Estimates:

Instrument	Number of Recordkeepers	Hours spent per Sponsor's agreement	Cost of Recordkeeper time	TOTAL ESTIMATED COST FOR RECORDKEEPERS
Sponsor's Agreement to Conditions of Release	4,595	.25	\$3.50	\$16,082.50
Verification of Release	4,595	.25	\$3.50	\$16,082.50
Family Reunification Packet	4,595	1	\$14.00	\$64,330.00

Authorization for Release of Information	4,595	.25	\$3.50	\$16,082.50
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Estimate total Cost for Federal grantee/contractor record keepers:
\$112,577.50

Duplication of Paper-based instruments:

TOTAL ESTIMATED PRINTING COST

Instrument	Est. Quantity of Instrument	Total Pages of Instrument	Cost Per Page	Total Estimated Printing Cost for per instrument:
Sponsor's Agreement	4,595	1	\$.05	\$229.75
Verification of Release	4,595	1	\$.05	\$229.75
Family Reunification Packet	4,595	5	\$.05	\$1,148.75
Authorization for Release of Information	4,595	2	\$.05	\$459.50

Estimated Total Cost for Paper-based Duplication: \$2,067.75

This estimate assumes \$.05 per page for duplication purposes.

Federal Staff Time and Costs:

The annualized cost estimate for each of these instruments considers estimates time of a step 5 GS-12 in the Washington, DC locality, at 2000 hours per fiscal year for \$34.36 per hour, to review information following the submittal. The estimate also assumes the average amount of time expected to review the information as provided.

Sponsor's Agreement (ORR R-1/R-1s formerly ORR R-420 & ORR R-420s)

ESTIMATED COST FOR FEDERAL STAFF

Est. Quantity of Sponsor's Agreement	Hours Spent per Sponsor's Agreement	Cost of Federal Staff	TOTAL ESTIMATED COST
4,595	.0833	\$34.36	\$13,151.75

Estimated Total Cost for Federal Staff: \$13,151.75

Verification of Release (ORR R-2/R-2s formerly ORR R-535)

ESTIMATED COST FOR FEDERAL STAFF

Est. Quantity of Verification of Release	Hours Spent per Verification of Release	Cost of Federal Staff	TOTAL ESTIMATED COST
4,595	.0833	\$34.36	\$13,151.75

Estimated Total Cost for Federal Staff: \$13,151.75

Family Reunification Packet (ORR R-4/R-4s formerly FRP-081 & FRP-081s):
ESTIMATED COST FOR FEDERAL STAFF

Est. Quantity of Family Reunification Packet	Hours Spent per Family Reunification Packet	Cost of Federal Staff	TOTAL ESTIMATED COST
4,595	.1666	\$34.36	\$26,303.50

Estimated Total Cost for Federal Staff: \$26,303.50

Authorization for Release of Information (ORR R-317 & R-317s):
ESTIMATED COST FOR FEDERAL STAFF

Est. Quantity of Authorization of Release of Information	Hours Spent per Authorization of Release of Information	Cost of Federal Staff	TOTAL ESTIMATED COST
4,595	.0833	\$34.36	\$13,151.75

Estimated Total Cost for Federal Staff: \$13,151.75

TOTAL ESTIMATED COST FOR FEDERAL STAFF FOR ALL FAMILY REUNIFICATION FORMS:
 \$180,404.00

15. Explanation for Program Changes or Adjustments

There is no burden effect that is the result of program changes. Instead an adjustment has been made as the result of amending the calculation of burden hours and costs. This is not the result of the minor changes to the forms.

ORR has better calculated the anticipated number of respondents in this information collection than the past. Previous submissions to OMB calculated the total amount of UAC exiting ORR custody as a calculation of how many sponsors ORR expected annually. However, the number of UAC who are released to a sponsor is only a percentage of all UAC that exit custody (some UAC are discharged directly to the U.S. Department of Homeland Security for removal, for aging out in ORR care; some UAC are released to ORR's Unaccompanied Refugee Minor program, etc.). This mistake has been corrected in this Supporting Statement. Additionally, the calculation of burden hours was done incorrectly (there were mathematical errors in the previous submission) and ORR has corrected these mistakes as well.

There has been increase in the number of respondents this was calculated by the ORR/DUCS statistician utilizing the following procedures: taking FY 10 numbers and computed the percentage change each month; taking the FY 11 released known from October 2010 to December 2010; forecasted FY 11 monthly releases from January 2011 to September 2011 by computing the percentage change that occurred each of these months from FY 10; and adding the monthly releases computed as well as those already determined to get the FY 11 total releases.

Because of the changes in the anticipated number of respondents and the corrected number of burden hours has impacted final cost calculations. However, ORR believes these burdens and costs to be more accurate than they have been in previous submissions. Additionally, ORR was advised by OMB to include record keepers time into the calculation for costs to the

Federal government because record keepers are Federal grantees/contractors doing work on behalf of the Federal government.

16. Plans for Tabulation and Publication and Project Time Schedule

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

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

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

ACF/ORR does not take any exception to any of the items in the certification statement.

B. Statistical Methods (used for collection of information employing statistical methods)

1. Respondent Universe and Sampling Methods

N/A

2. Procedures for the Collection of Information

N/A

3. Methods to Maximize Response Rates and Deal with Nonresponse

N/A

4. Test of Procedures or Methods to be Undertaken

N/A

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

N/A