

MEMORANDUM

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DATE: February 25, 2019

TO: Gerald S. Schatz, Esq., and Carol A. Kalinoski, Esq.,

FROM: Tiffany McCormack and Gabrielle Newell, Office of Planning, Research, and Evaluation (OPRE)

SUBJECT: Reply to comments submitted in response to the 60-day Federal Register Notice for “the Descriptive Study of the Unaccompanied Refugee Minors Program”

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Thank you for your detailed comments on the 60-day Federal Register Notice for “the Descriptive Study of the Unaccompanied Refugee Minors Program”.

Attached are the Supporting Statements associated with this information collection request, which provide additional context about the Unaccompanied Refugee Minors Program and this proposed information collection. We believe the information in the Supporting Statements will address most of your concerns and questions.

We provide additional information to address two concerns below.

*a. Response to concerns raised in subsection “Research subject protection”*

The study was reviewed by and approved by the Child Trends IRB via full board review. The Child Trends IRB is registered and in good standing with HHS (registration number IRB00009005). Its board membership meets the requirements outlined in 45 CFR 46.107. The IRB has determined that this study presents no more than minimal risk, and that adequate protections have been taken to minimize those risks.

*b. Responses to concerns raised in subsection “U.S. international legal obligations”*

Participants are not only able to choose whether they want to be part of a focus group but are also able to choose their level of participation. Participants are also able to stop at any time. The use of focus groups does not conflict with the provisions of the International Covenant on Civil and Political Rights (ICCPR) or the interpretation of the ICCPR.