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Office of Management and Budget (OMB)

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Subject: Non-Substantive Change Request – Services Provided to Unaccompanied Alien Children (OMB #0970-0553)

This memo requests approval of a non-substantive change to the approved information collection, Services Provided to Unaccompanied Alien Children (OMB #0970-0553).

BACKGROUND

The Services Provided to Unaccompanied Alien Children information collection contains 22 instruments that allow ORR to collect information necessary to provide services to Unaccompanied Children (UC) as required by the Homeland Security Act (6 U.S.C. 279), the Trafficking Victims Protection Reauthorization Act of 2008 (8 U.S.C. 1232), and the *Flores* Settlement Agreement (No. CV85-4544-RJK (C.D. Cal. 1996)). The collection was last approved by OMB on March 10, 2021 and expires on March 31, 2022.

OVERVIEW OF REQUESTED CHANGES

ORR is proposing minor revisions to one instrument contained in this information collection, the *Sponsor Assessment*. The *Sponsor Assessment* is used to by ORR grantee/contractor case managers to assess the suitability of a potential sponsor to provide for the safety and well-being of the UC and ensure safe.

Care providers identified, and ORR confirmed, that the current *Sponsor Assessment (Form S-5)* has duplicate questions within the document itself and that it unnecessarily repeats questions found in the *UC Assessment (OMB #0970-0553, Form S-11)*. Care providers have flagged the duplication as an issue that results in delays completing the assessment and unification of the UC.

To address the issue, ORR proposes removing questions from the *Sponsor Assessment* that are duplicative and/or do not add value to the sponsor vetting process. The removal of these questions does not change the way in which ORR uses the information collected in this instrument and it in no way diminishes or changes the overall value of the assessment, nor does it present a risk to the safety and well-being of UC. Rather, the proposed revisions will streamline the assessment, reduce the burden for sponsors and case managers, and expedite unifications. This will result in more open Emergency Intake Site and licensed beds needed for other UC. Safely expedit-

ing unification is essential for child well-being and reduces costs. The *Sponsor Assessment* is currently in Word format and will be updated to a fillable PDF.

Proposed nonsubstantive changes:

1. ORR recommends changing “UAC,” which refers to Unaccompanied Alien Children, to “UC,” which stands for Unaccompanied Children, throughout the document for consistency with ORR terminology guidance.
2. In the “UC Basic Information” section, ORR recommends removing fields for “AKA”, “Age”, “Country of Birth”, “LOS”, and “Admitted Date” so only the basic information needed to associate the UC to the assessment is provided and removes superfluous information.
3. In the “Sponsor Basic Information” section, ORR recommends removing fields for “AKA”, “Age”, “Country of Birth”, and “Country of Residency” so only the basic information needed to associate the potential sponsor to the assessment is provided and removes superfluous information.
4. In the “Family Relationships” section, ORR recommends removing the question:
 - a. “Are you married to your partner? (y/n)” as the question directly below asks the same question and is duplicative (question states “Are you legally married or is the relationship a partnership or cohabitation?”).
 - b. “Have you ever been involved in a Dissolution of Marriage case? (y/n) If yes, explain” as it is not relevant to the assessment of a sponsor to care for a child.
 - c. “Did any of your children come to the U.S. with you? (If not born in U.S.) (y/n)” as it is redundant to the information requested in the "Family and Family Friends in the U.S." table.
5. In the “Previous Sponsorship” section, ORR recommends adding a follow-up question to the question “Did you undergo a home study? (y/n) If yes, why?” to clarify the question’s intent. The follow-up question is “What was the recommendation of the home study?”
6. In the “Proof of Relationship” section, ORR recommends adding a text field to capture information when a DNA test is used in lieu of or in addition to documentation to prove a relationship between a child and sponsor. Currently, care providers already enter this information into the catch-all “Explain how the sponsor is related to or knows the UC and/or the UC’s family” text box in which care providers provide an explanation of how the sponsor is related, which includes how the care provider determined that relationship (i.e., documentation and/or DNA). This change is to create a separate text box specific to possibilities for determination of relationship; it does not collect different or additional information.
7. In the “Proof of Address” section, ORR recommends:
 - a. Removing the following questions: “Describe the area/neighborhood where you reside” and “Do you receive your mail at a different address? (y/n) If yes, what is the address that you use to receive mail?” These questions are not relevant to the assessment of a sponsor to care for a child.
 - b. Adding a column to the proof of address table titled “Dated within the past 2

- months? (y/n)” to align with agency Policy Guidance Part 2.2.4.
- c. Removing the question “Where else have you lived in the U.S.?” and the associated table as past addresses are only required to complete certain background checks and are collected in the *Authorization of Release of Information* form when needed.
8. In the “Proof of Stability” section, ORR recommends removing the question “Length of time at present employer” as it is not relevant to the assessment of a sponsor to care for a child, and all other employment-related questions would remain.
 9. In the “Sponsor Care Plan” section, ORR recommends removing the following questions as the intent of the questions are already met in the remaining questions in the section; doing so does not reduce the value of the sponsor assessment process:
 - a. “Tell me about your plans to address the UAC's educational needs”
 - b. “Who will supervise the UAC before and after school?”
 - c. “What are the medical services in your area?”
 - d. “What are the counseling services in your area?”
 - e. “Tell me about the types of community resources and services that you plan to access to address the UAC's needs”
 - f. “Is the potential sponsor familiar with community resources and services in the area? (Case Manager assists sponsor in identifying community service providers and programs and encourages sponsor to participate in applicable services such as parenting, gang prevention, substance abuse psycho-education in preparation for UAC's release)”
 - g. “Is there anything that would prevent the sponsor from enrolling in supportive services for the UAC's needs?”
 - h. “Will you accept assistance from Post-Release Service providers? (if applicable)”
 10. In the “Sponsor Care Plan” section, ORR recommends deleting the subsection title “Safety Plan” as the question relates to the “Sponsor Care Plan” and should be aligned as such.
 11. ORR recommends re-titling the section “Criminal History” to “Self-Disclosed Criminal History” as that title more accurately reflects what is divulged during a sponsor interview and does not ask for any additional information.
 12. In the “UC Journey and Apprehension” section, ORR recommends replacing a series of ten questions with a fewer set of questions to more succinctly and directly get to the information needed (no additional or new information is requested with the replacement questions). Specifically:
 - a. Removing the following ten questions:
 - i. “Describe the UAC’s day to day life in home country: (space)”
 - ii. “Do you know why the UAC decided to travel to the U.S. at this time? (space)”
 - iii. “Did the potential sponsor mention any U.S. immigration policy or practice as a factor in the UAC’s decision to travel to the U.S.? (y/n)”

- iv. “Did the potential sponsor mention economic, job, or educational opportunities as a factor in the UAC’s decision to travel to the U.S.? (y/n)”
 - v. “When did the UAC leave his/her home country (month, day, and year)? (space)”
 - vi. “How long did the trip take? (space)”
 - vii. Who paid for the UAC’s trip to the U.S.? (space)”
 - viii. “How did the UAC get to the U.S.? (space)”
 - ix. “Where was the UAC planning on living in the U.S. and with whom? (space)”
 - x. “Do you know if the UAC has ever been to the U.S. before? (y/n) If yes, when? (space)”
- b. Replacing the deleted questions above with the following three questions;:
- i. “Do you know why the UC left their home country to come to the U.S.?”
 - ii. “Are you aware of any particular issues that happened to the UC along the journey that may need to be addressed when they come to live with you?”
 - iii. “Does the sponsor owe any debt for the UC trip?”