# Monitoring and Compliance for ORR Care Provider Facilities

# OMB Information Collection Request 0970 - NEW

# **Supporting Statement Part A - Justification**

February 2021

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

#### SUPPORTING STATEMENT A – JUSTIFICATION

This information collection request (ICR) consists of several forms that allow the Unaccompanied Alien Children (UAC) Program to monitor its care provider facilities for compliance with Federal and State laws and regulations, licensing and accreditation standards, ORR policies and procedures, and child welfare standards. Consistent with the Paperwork Reduction Act of 1995, and OMB procedures, the Department requests approval for emergency processing for Monitoring and Compliance forms for the Unaccompanied Children program. On January 21, 2021, the Department published a Notice of Request for Public Comment for the forms, initiating a 60-day period for the public to submit comments on the information collection. The 60-day comment period ends on March 22, 2021. The monitoring and compliance forms are necessary for the program to meet its statutory obligations (Homeland Security Act, 6 U.S.C. 279). The Department requests emergency OMB approval pursuant to 5 CFR 1320.13 in order for the monitoring and compliance forms to be used by ORR field offices while public comment is being sought. The Department plans to complete the ongoing PRA process for the three-year approval of the monitoring and compliance forms since approval based on emergency processing under the PRA is only granted for a maximum of 180 days, until August 2021.

#### 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 alien children (UAC) 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 UAC should be placed and sets minimum standards for the housing, services, transportation, and discharge of UAC. *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 UAC in federal custody. The TVPRA also directs ORR to create policies to ensure UAC 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 UAC in accordance with section 1101(c) of the Violence Against Women Reauthorization Act of 2013, Pub. L. 113-4 (VAWA 2013).

ORR's UAC Program provides care and custody for UAC 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 UAC in ORR custody. Care provider facilities are Statelicensed, 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.

ORR is submitting several instruments directly related to the care of UAC for processing pursuant to the Paperwork Reduction Act. These instruments allow ORR to monitor its care provider facilities for compliance with Federal and State laws and regulations, licensing and accreditation standards, ORR policies and procedures, and child welfare standards. The proposed instruments are:

- Corrective Action Report (Form M-1)
- FFS Compliance and Safety Site Visit Report (Form M-3A)
- Out-of-Network Site Visit Report (Form M-3B)
- Checklists for a Child-Friendly Environment (Form M-4A to M-4B)
- UAC Incident Review (Form M-5A)
- Adult Incident Review (Form M-5B)
- Monitoring Notes (Forms M-6A to M-6D)
- Site Visit Guides (Forms M-7A to M-7F)
- Case File Checklists (Forms M-8A to M-8D)
- On Site Monitoring Checklists (Forms M-9A to M-9C)
- Personnel File Checklists (Forms M-10A to M-10D)
- Program Staff Questionnaires (Forms M-11A to M-11O)
- Child Questionnaires (Forms M-12A to M-12D)
- Service Provider Questionnaires (Forms M-13A to M-13E)
- Monitoring Visit (Form M-14)
- Monitoring Schedule (Form M-15)

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

Unless otherwise noted below, related policies can be found in <u>ORR Policy Guide Section 5.5 Monitoring</u> and <u>Compliance</u>.

- Corrective Action Report (Form M-1): This instrument is used by ORR Monitoring Team staff (includes Federal and contractor staff), ORR Federal Field Specialists, and ORR Project Officers to document care provider non-compliance with minimum standards for the care and timely release of UAC; Federal and State Laws and regulations; licensing standards; ORR policies and procedures; and child welfare standards. Care providers respond to each corrective action cited by ORR staff by entering a detail corrective action plan into the instrument and attaching any relevant supporting documents. Then ORR staff document when each corrective action plan is completed to ORR's satisfaction and enter a final determination.
- **FFS Compliance and Safety Site Visit Report (Form M-3A):** This instrument is used by ORR Federal Field Specialists to document site visit observations and interview responses.

 Out-of-Network Site Visit Report (Form M-3B): This instrument is used by ORR Federal Field Specialists to document site visit observations and interview responses for out-of-network providers.

#### **Checklists for a Child-Friendly Environment**

These instruments are used by care providers on a voluntary basis to help ensure compliance with ORR policies and procedures related to maintaining a safe, child-friendly environment. ORR may also ask care providers to complete the checklist prior to a site visit.

- Checklist for a Child-Friendly Environment Care Provider Facility (Form M-4A)
- Checklist for a Child-Friendly Environment Individual Foster Home (Form M-4B)

#### **Incident Reviews**

These instruments are used by ORR care provider staff to provide information to ORR on allegations of sexual abuse or sexual harassment that occurred in ORR care that were investigated by local child protective services (CPS), State licensing, local law enforcement, the HHS Office of the Inspector General (OIG), and/or the Federal Bureau of Investigation (FBI). Care providers submit the instrument to ORR's Prevention of Sexual Abuse Team for review. Incident reviews help ensure that care providers have appropriate protective measures in place to prevent a similar incident from occurring again. See ORR Policy Guide Section 4.11 Incident Reviews and Data Collection for related policies.

- **UAC Incident Review (Form M-5A):** This instrument is completed for allegations of sexual abuse or sexual harassment that occurred in ORR care between two children.
- **Adult Incident Review (Form M-5B):** This instrument is completed for allegations of sexual abuse or sexual harassment that occurred in ORR care between a child and an adult.

#### **Monitoring Notes**

These instruments are used by ORR Monitoring Team staff (includes Federal and contractor staff) to compile comprehensive notes and information related to biennial monitoring visits. There are separate instruments tailored specifically for monitoring of long term foster care (LTFC) programs and/or remote monitoring visits.

- Monitoring Notes (Form M-6A)
- Remote Monitoring Notes (Form M-6B)
- Long Term Foster Care Monitoring Notes (Form M-6C)
- Long Term Foster Care Remote Monitoring Notes (Form M-6D)

#### **Site Visit Guides**

These instruments are completed by care provider staff as part of the pre-monitoring process for biennial site visits and provide ORR Monitoring Team staff with information and supporting documents related to the overall functioning and oversight of the care provider program. There are separate instruments tailored specifically for monitoring of LTFC programs, home study and post-release (HS/PRS) service providers, and/or voluntary agencies (primary grantees for LTFC and transitional foster care (TFC) subgrantees).

• Site Visit Guide (Form M-7A)

- Remote Monitoring Site Visit Guide (Form M-7B)
- Long Term Foster Care Site Visit Guide (Form M-7C)
- Long Term Foster Care Remote Site Visit Guide (Form M-7D)
- Home Study and Post-Release Services Site Visit Guide (Form M-7E)
- Voluntary Agency Site Visit Guide (Form M-7F)

#### **Case File Checklists**

These instruments are used by ORR Monitoring Team staff (includes Federal and contractor staff) during biennial site visits to document care provider compliance with ORR policies and procedures related to case file maintenance. There are separate instruments tailored specifically for monitoring of LTFC programs, and HS/PRS providers, plus an addendum for secure and staff secure programs.

- UAC Case File Checklist (Form M-8A)
- Long Term Foster Care Case File Checklist (Form M-8B)
- Home Study and Post-Release Services Case File Checklist (Form M-8C)
- Secure and Staff Secure Addendum to Case File Checklist (Form M-8D)

#### **On Site Monitoring Checklists**

These instruments are used by ORR Monitoring Team staff (includes Federal and contractor staff) to document their findings during the walkthrough portion of biennial site visits. There are separate instruments tailored specifically for monitoring of foster homes and PRS home observations.

- On Site Monitoring Checklist (Form M-9A)
- Foster Home On Site Monitoring Checklist (Form M-9B)
- Post-Release Services Home Observation (Form M-9C)

#### **Personnel File Checklists**

These instruments are completed by care provider staff and ORR Monitoring Team staff (includes Federal and contractor staff) during biennial site visits to ensure that programs are meeting ORR policies and procedures related to the maintenance of personnel files. There are separate instruments tailored specifically for HS/PRS provider files and LTFC parent files.

- Personnel File Checklist (Form M-10A)
- Supplement to Personnel File Checklist (Form M-10B)
- Home Study and Post-Release Services Personnel File Checklist (Form M-10C)
- Long Term Foster Care Foster Parent Checklist (Form M-10D)

#### **Program Staff Questionnaires**

These instruments are used by ORR Monitoring Team staff (includes Federal and contractor staff) during biennial site visits to interview and document responses from various care provider program staff.

- Program Director Questionnaire (Form M-11A)
- Long Term Foster Care Program Director Questionnaire (Form M-11B)
- Clinician Questionnaire (Form M-11C)
- Long Term Foster Care Clinician Questionnaire (Form M-11D)
- Case Manager Questionnaire (Form M-11E)
- Long Term Foster Care Case Manager Questionnaire (Form M-11F)

- Education Staff Questionnaire (Form M-11G)
- Long Term Foster Care Education Questionnaire (Form M-11H)
- Medical Coordinator Questionnaire (Form M-11I)
- Youth Care Worker Questionnaire (Form M-11J)
- Prevention of Sexual Abuse Compliance Manager Staff Questionnaire (Form M-11K)
- Secure Detention Officer Questionnaire (Form M-11L)
- Long Term Foster Care Home Finder Questionnaire (Form M-11M)
- Long Term Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)
- Long Term Foster Care Foster Parent Questionnaire (Form M-110)

#### **Child Questionnaires**

These instruments are used by ORR Monitoring Team staff (includes Federal and contractor staff) during biennial site visits to interview and document responses from UAC.

- UAC Questionnaire Ages 6-12 Years Old (Form M-12A)
- UAC Questionnaire Ages 13 and Older (Form M-12B)
- Long Term Foster Care Client Questionnaire (Form M-12C)
- Secure Client Questionnaire (Form M-12D)

#### **Service Provider Questionnaires**

These instruments are used by ORR Monitoring Team staff (includes Federal and contractor staff) during biennial site visits to interview and document responses from various service providers.

- Home Study and Post-Release Services Director Questionnaire (Form M-11A)
- Home Study and Post-Release Services Caseworker Questionnaire (Form M-13B)
- Legal Service Provider Questionnaire (Form M-13C)
- Long Term Foster Care Legal Service Provider Questionnaire (Form M-13D)
- Case Coordinator Questionnaire (Form M-13E)

#### **Monitoring Visit Planning**

These instruments are used by ORR Monitoring Team staff (includes Federal and contractor staff) to plan and track biennial site visits for each fiscal year.

- Monitoring Visit (Form M-14)
- Monitoring Schedule (Form M-15)

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

ORR is in the process of developing a new case management system, UAC Path. UAC Path will streamline information management by consolidating UAC 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. ORR will incorporate two of instruments in this

collection into UAC Path for the system's first round of development. One instrument will be partially available in UAC Path and partially available in Excel format (the Excel portion will be incorporated into UAC Path later in 2021). The remaining instruments will be available in either PDF, Word, or Excel format.

#### **Excel Instruments**

- FFS Compliance and Safety Site Visit Report (Form M-3A)
- Out-of-Network Site Visit Report (Form M-3B) FFS Observations
- Case File Checklists (Forms M-8A to M-8D)
- Personnel File Checklists (Forms M-10A to M-10D)

#### **PDF Instruments**

- Checklist for a Child-Friendly Environment Care Provider Facility (Form M-4A)
- Checklist for a Child-Friendly Environment Individual Foster Home (Form M-4B)
- UAC Incident Review (Form M-5A)
- Adult Incident Review (Form M-5B)

#### **Word Instruments**

- Corrective Action Report (Form M-1)
- Monitoring Notes (Forms M-6A to M-6D)
- Site Visit Guides (Forms M-7A to M-7F)
- On Site Monitoring Checklists (Forms M-9A to M-9C)
- Program Staff Questionnaires (Forms M-11A to M-11O)
- Child Questionnaires (Forms M-12A to M-12D)
- Service Provider Questionnaires (Forms M-13A to M-13E)

#### **UAC Path Instruments**

- Out-of-Network Site Visit Report (Form M-3B) UAC Interview
- Monitoring Visit (Form M-14)
- Monitoring Schedule (Form M-15)

#### 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 requests on these forms would impede ORR from performing its charged duty of providing oversight of its care provider programs.

#### 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 January 21, 2021, Volume 86, Number 12, page 6340, and allows a sixty-day period for public comment. A full request will document any comments received and how ACF has considered the comments.

ORR plans to consult with OMB regarding the use of the non-substantial change process to update these instruments. Sometimes changes to Federal and State laws and regulations, licensing and accreditation standards, ORR policies and procedures, or child welfare standards necessitate a corresponding change in ORR's monitoring and compliance instruments. The inability to quickly make corresponding changes to instruments would impede ORR's ability to properly monitor care provider programs.

#### 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 may be collected in the *Adult Incident Review* and *UAC Incident Review* in order for ORR to conduct a thorough review of a care provider program's response to an allegation of sexual abuse or sexual harassment. ORR does not ask for any information of a sensitive nature beyond what is needed to conduct its review. ORR does not request sensitive information during site visit interviews, however, sensitive information be collected depending upon what information interviewee chooses to divulge during the interview.

#### 12. Estimates of Annualized Burden Hours and Costs

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

- ORR funds approximately 216 care provider grantees and ORR also funds approximately 60 post-release service grantees and sub-grantees.
- The actual number of corrective action reports issued in FY2019.
- Care provider grantees receive, at a minimum, monthly site visits from their Federal Field Specialist and biennial site visits from the ORR Monitoring Team.
- ORR employs approximately four contractor monitors and 10 Federal monitors.
- 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  $-\$19.21 \times 2 = \$38.42$

## **Estimated Burden Hours and Opportunity Costs for Respondents**

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Burden Hours per Response	Annual Total Burden Hours	Average Hourly Wage	Annual Total Cost
Corrective Action Report (Form M-1)	216	0.5	5.00	540.00	\$38.42	\$20,746.80
FFS Compliance and Safety Site Visit Report (Form M-3A)	216	12.0	1.00	2,592.00	\$38.42	\$99,584.64
Out-of-Network Site Visit Report (Form M- 3B)	24	5.0	1.00	120.00	\$38.42	\$4,610.40
Checklist for a Child- Friendly Environment (Form M-4)	216	12.0	0.25	648.00	\$38.42	\$24,896.16
Incident Reviews (Forms M-5A to M-5B)	216	0.3	1.50	97.20	\$38.42	\$3,734.42
Site Visit and Remote Monitoring Site Visit Guides (Forms M-7A to M-7B)	93	1.0	12.00	1,116.00	\$38.42	\$42,876.72
LTFC Site Visit and LTFC Remote Monitoring Site Visit Guides (Forms M-7C to M-7D)	15	1.0	6.00	90.00	\$38.42	\$3,457.80
HS/PRS Site Visit Guide (Form M-7E)	30	1.0	6.00	180.00	\$38.42	\$6,915.60
Voluntary Agency Site Visit Guide (Form M- 7F)	5	1.0	8.00	40.00	\$38.42	\$1,536.80

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Burden Hours per Response	Annual Total Burden Hours	Average Hourly Wage	Annual Total Cost
UAC Case File Checklist (Form M- 8A)	93	5.0	1.00	465.00	\$38.42	\$17,865.30
Long Term Foster Care File Checklist (Form M-8B)	15	5.0	1.00	75.00	\$38.42	\$2,881.50
Home Study and Post- Release Services Case File Checklist (Form M-8C)	30	5.0	1.00	150.00	\$38.42	\$5,763.00
Secure and Staff Secure Addendum to Case File Checklist (Form M-8D)	4	5.0	1.00	20.00	\$38.42	\$768.40
Program Staff Questionnaires (Form M-11A-K)	756	1.0	1.00	756.00	\$38.42	\$29,045.52
Secure Detention Officer Questionnaire (Form M-11L)	1	1.0	1.00	1.00	\$38.42	\$38.42
Long Term Foster Care Home Finder Questionnaire (Form M-11M)	15	1.0	1.00	15.00	\$38.42	\$576.30
Long Term Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)	15	1.0	1.00	15.00	\$38.42	\$576.30
Long Term Foster Care Foster Parent Questionnaire (form M-110)	30	1.0	0.75	22.50	\$38.42	\$864.45
UAC Questionnaires (Forms M-12A-B)	460	1.0	0.50	230.00	\$38.42	\$8,836.60
Long Term Foster Care Client Questionnaire (M-12C)	75	1.0	0.50	37.50	\$38.42	\$1,440.75
Secure Client Questionnaire (Form M-12D)	5	1.0	0.50	2.50	\$38.42	\$96.05
Home Study and Post- Release Services Director Questionnaire (Form M-13A)	30	1.0	1.00	30.00	\$38.42	\$1,152.60
Home Study and Post- Release Services Caseworker	90	1.0	1.00	90.00	\$38.42	\$3,457.80

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Burden Hours per Response	Annual Total Burden Hours	Average Hourly Wage	Annual Total Cost
Questionnaire (Form M-13B)		_				
Legal Service Provider Questionnaire (Form M-13C)	93	1.0	1.00	93.00	\$38.42	\$3,573.06
Long Term Foster Care Legal Service Provider Questionnaire (Form M-13D)	15	1.0	0.75	11.25	\$38.42	\$432.23
Case Coordinator Questionnaire (Form M-13E)	108	1.0	1.00	108.00	\$38.42	\$4,149.36
			Estimated nual Burden Hours Total:	7,544.95	Estimated Annual Cost Total:	\$289,876.98

# **Estimated Burden Hours and Opportunity Costs for Contractor Monitors**

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Burden Hours per Response	Annual Total Burden Hours	Average Hourly Wage	Annual Total Cost
Corrective Action Report (Form M-1)	4	25.0	22.00	2,200.00	\$38.42	\$84,524.00
Monitoring and Remote Monitoring Notes (Forms M-6A to M-6B)	4	7.0	12.00	336.00	\$38.42	\$12,909.12
LTFC Monitoring and LTFC Remote Monitoring Notes (Forms M-6C to M- 6D)	4	1.0	12.00	48.00	\$38.42	\$1,844.16
Site Visit and Remote Monitoring Site Visit Guides (Forms M-7A to M-7B)	4	7.0	28.00	784.00	\$38.42	\$30,121.28
LTFC Site Visit and LTFC Remote Monitoring Site Visit Guides (Forms M-7C to M-7D)	4	1.0	21.00	84.00	\$38.42	\$3,227.28
HS/PRS Site Visit Guide (Form M-7E)	4	2.0	21.00	168.00	\$38.42	\$6,454.56

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Burden Hours per Response	Annual Total Burden Hours	Average Hourly Wage	Annual Total Cost
Voluntary Agency Site Visit Guide (Form M- 7F)	4	0.4	28.00	44.80	\$38.42	\$1,721.22
UAC Case File Checklist (Form M- 8A)	4	33.0	6.00	792.00	\$38.42	\$30,428.64
Long Term Foster Care File Checklist (Form M-8B)	4	5.0	3.00	60.00	\$38.42	\$2,305.20
Home Study and Post- Release Services Case File Checklist (Form M-8C)	4	11.0	1.00	44.00	\$38.42	\$1,690.48
Secure and Staff Secure Addendum to Case File Checklist (Form M-8D)	4	1.0	1.00	4.00	\$38.42	\$153.68
On Site Monitoring Checklist (Form M- 9A)	4	7.0	4.00	112.00	\$38.42	\$4,303.04
Foster Home On Site Monitoring Checklist (Form M-9B)	4	2.0	0.50	4.00	\$38.42	\$153.68
Post-Release Services Home Observation (Form M-9C)	4	4.0	0.50	8.00	\$38.42	\$307.36
Personnel File Checklist (Form M- 10A)	4	31.0	1.00	124.00	\$38.42	\$4,764.08
Supplement to Personnel File Checklist (Form M- 10B)	4	54.0	1.00	216.00	\$38.42	\$8,298.72
Home Study and Post- Release Services Personnel File Checklist (Form M- 10C)	4	6.0	1.00	24.00	\$38.42	\$922.08
Long Term Foster Care Foster Parent Checklist (Form M-10D)	4	2.0	0.50	4.00	\$38.42	\$153.68
Program Staff Questionnaires (Form M-11A-K)	4	54.0	1.00	216.00	\$38.42	\$8,298.72
Secure Detention Officer Questionnaire (Form M-11L)	4	0.1	1.00	0.40	\$38.42	\$15.37
Long Term Foster Care	4	1.0	1.00	4.00	\$38.42	\$153.68

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Burden Hours per Response	Annual Total Burden Hours	Average Hourly Wage	Annual Total Cost
Home Finder Questionnaire (Form M-11M)						
Long Term Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)	4	1.0	1.00	4.00	\$38.42	\$153.68
Long Term Foster Care Foster Parent Questionnaire (form M-110)	4	2.0	0.75	6.00	\$38.42	\$230.52
UAC Questionnaires (Forms M-12A-B)	4	33.0	0.50	66.00	\$38.42	\$2,535.72
Long Term Foster Care Client Questionnaire (M-12C)	4	5.0	0.50	10.00	\$38.42	\$384.20
Secure Client Questionnaire (Form M-12D)	4	0.4	0.50	0.80	\$38.42	\$30.74
Home Study and Post- Release Services Director Questionnaire (Form M-13A)	4	2.0	0.50	4.00	\$38.42	\$153.68
Home Study and Post- Release Services Caseworker Questionnaire (Form M-13B)	4	6.0	1.00	24.00	\$38.42	\$922.08
Legal Service Provider Questionnaire (Form M-13C)	4	7.0	1.00	28.00	\$38.42	\$1,075.76
Long Term Foster Care Legal Service Provider Questionnaire (Form M-13D)	4	1.0	0.75	3.00	\$38.42	\$115.26
Case Coordinator Questionnaire (Form M-13E)	4	8.0	1.00	32.00	\$38.42	\$1,229.44
Monitoring Visit (Form M-14)	4	8.0	0.50	16.00	\$38.42	\$614.72
Monitoring Schedule (Form M-15)	4	0.3	0.33	0.40	\$38.42	\$15.37
		5,471	Estimated Annual Cost Total:	\$210,211.19		

## 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 for ORR Federal staff (Monitors, Field Specialists, and Project Officers) to complete the instruments and 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 Hours per Response	Annual Total Federal Staff Burden Hours	Average Federal Staff Hourly Wage	Annual Total Federal Staff Cost
Corrective Action Report (Form M-1)	73	1.0	22.00	1,606.00	\$82.74	\$132,880.44
FFS Compliance and Safety Site Visit Report (Form M-3A)	45	58.0	1.25	3,262.50	\$82.74	\$269,939.25
Out-of-Network Site Visit Report (Form M- 3B)	45	3.0	1.00	135.00	\$82.74	\$11,169.90
Checklist for a Child- Friendly Environment (Form M-4)	45	58.0	0.17	443.70	\$82.74	\$36,711.74
Incident Reviews (Forms M-5A to M- 5B)	5	15.0	2.00	150.00	\$82.74	\$12,411.00
Monitoring and Remote Monitoring Notes (Forms M-6A to M-6B)	10	7.0	12.00	840.00	\$82.74	\$69,501.60
LTFC Monitoring and LTFC Remote Monitoring Notes (Forms M-6C to M- 6D)	10	1.0	12.00	120.00	\$82.74	\$9,928.80
Site Visit and Remote Monitoring Site Visit Guides (Forms M-7A to M-7B)	10	7.0	28.00	1,960.00	\$82.74	\$162,170.40
LTFC Site Visit and LTFC Remote Monitoring Site Visit	10	1.0	21.00	210.00	\$82.74	\$17,375.40

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Federal Staff Burden Hours per Response	Annual Total Federal Staff Burden Hours	Average Federal Staff Hourly Wage	Annual Total Federal Staff Cost
Guides (Forms M-7C to M-7D)						
HS/PRS Site Visit Guide (Form M-7E)	10	2.0	21.00	420.00	\$82.74	\$34,750.80
Voluntary Agency Site Visit Guide (Form M- 7F)	10	0.4	28.00	112.00	\$82.74	\$9,266.88
UAC Case File Checklist (Form M- 8A)	10	33.0	6.00	1,980.00	\$82.74	\$163,825.20
Long Term Foster Care File Checklist (Form M-8B)	10	5.0	3.00	150.00	\$82.74	\$12,411.00
Home Study and Post- Release Services Case File Checklist (Form M-8C)	10	11.0	1.00	110.00	\$82.74	\$9,101.40
Secure and Staff Secure Addendum to Case File Checklist (Form M-8D)	10	1.0	1.00	10.00	\$82.74	\$827.40
On Site Monitoring Checklist (Form M- 9A)	10	7.0	4.00	280.00	\$82.74	\$23,167.20
Foster Home On Site Monitoring Checklist (Form M-9B)	10	2.0	0.50	10.00	\$82.74	\$827.40
Post-Release Services Home Observation (Form M-9C)	10	4.0	0.50	20.00	\$82.74	\$1,654.80
Personnel File Checklist (Form M- 10A)	10	31.0	1.00	310.00	\$82.74	\$25,649.40
Supplement to Personnel File Checklist (Form M- 10B)	10	54.0	1.00	540.00	\$82.74	\$44,679.60
Home Study and Post- Release Services Personnel File Checklist (Form M- 10C)	10	6.0	1.00	60.00	\$82.74	\$4,964.40
Long Term Foster Care Foster Parent Checklist (Form M-10D)	10	2.0	0.50	10.00	\$82.74	\$827.40
Program Staff Questionnaires (Form	10	54.0	1.00	540.00	\$82.74	\$44,679.60

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Federal Staff Burden Hours per Response	Annual Total Federal Staff Burden Hours	Average Federal Staff Hourly Wage	Annual Total Federal Staff Cost
M-11A-K)						
Secure Detention Officer Questionnaire (Form M-11L)	10	0.1	1.00	1.00	\$82.74	\$82.74
Long Term Foster Care Home Finder Questionnaire (Form M-11M)	10	1.0	1.00	10.00	\$82.74	\$827.40
Long Term Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)	10	1.0	1.00	10.00	\$82.74	\$827.40
Long Term Foster Care Foster Parent Questionnaire (form M-110)	10	2.0	0.75	15.00	\$82.74	\$1,241.10
UAC Questionnaires (Forms M-12A-B)	10	33.0	0.50	165.00	\$82.74	\$13,652.10
Long Term Foster Care Client Questionnaire (M-12C)	10	5.0	0.50	25.00	\$82.74	\$2,068.50
Secure Client Questionnaire (Form M-12D)	10	0.4	0.50	2.00	\$82.74	\$165.48
Home Study and Post- Release Services Director Questionnaire (Form M-13A)	10	2.0	0.50	10.00	\$82.74	\$827.40
Home Study and Post- Release Services Caseworker Questionnaire (Form M-13B)	10	6.0	1.00	60.00	\$82.74	\$4,964.40
Legal Service Provider Questionnaire (Form M-13C)	10	7.0	1.00	70.00	\$82.74	\$5,791.80
Long Term Foster Care Legal Service Provider Questionnaire (Form M-13D)	10	1.0	0.75	7.50	\$82.74	\$620.55
Case Coordinator Questionnaire (Form M-13E)	10	8.0	1.00	80.00	\$82.74	\$6,619.20
Monitoring Visit (Form M-14)	10	8.0	0.50	40.00	\$82.74	\$3,309.60
Monitoring Schedule	10	0.3	0.33	0.99	\$82.74	\$81.91

Information Collection Title	Annual Number of Respondents	Annual Number of Responses per Respondent	Average Federal Staff Burden Hours per Response	Annual Total Federal Staff Burden Hours	Average Federal Staff Hourly Wage	Annual Total Federal Staff Cost
(Form M-15)						
			Estimated		Estimated	
			Annual Burden	13,776	Estimated Annual	\$1,139,800.5
			Hours	15,770	Cost	9
			Total:		Total:	

# 15. Explanation for Program Changes or Adjustments

This is a new information collection request.

## 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.