**To:** Jordan Cohen

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

**From:** Shannon Herboldsheimer

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Administration for Children and Families (ACF)

**Date:** July 12, 2021

**Subject:** Non-Substantive Change Request – Monitoring and Compliance for Office of Refugee Resettlement (ORR) Care Provider Facilities (OMB #0970-0564)

This memo requests approval of a non-substantive change to the approved information collection, Monitoring and Compliance for Office of Refugee Resettlement (ORR) Care Provider Facilities (OMB #0970-0564).

**Background**

The Monitoring and Compliance for ORR Care Provider Facilities information collection consists of several forms that allow the Unaccompanied Children (UC) 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. Currently, there are two versions of a questionnaire for UCs ages 6-12 and ages 13 and older (UC Questionnaires, Forms M-12A and M-12B, respectively). The ORR monitoring team would like to include an alternate version for UCs aged 5 and under.

**Overview of Requested Changes**

ORR is proposing to include an alternate version of the UC questionnaire for UCs aged 5 and under. The alternate form (Form M-12E) is designed to gather information on the same topics as the current forms, but the version for 6-12-year-old UCs has been modified to be more child-friendly for children 5 and under.

Topics covers by Forms M-12A, M-12B, and M-12E:

* Admission/Orientation
* Education/School
* Recreation/Structured Leisure Activities
* Religious Services
* Food/Snacks
* Medical
* Legal (ages 13 and up only)
* Communication with Family
* Meetings with Case Management Staff/Reunification (ages 13 and up only)
* Clinical Services (ages 13 and up only)
* Program Rules
* Reporting a Complaint or Abuse
* Safety

The questions on the current forms may be difficult for very young children to understand and respond to, even when phrased in a child-friendly manner, and the child may become disinterested or distracted because they are not being engaged on their level. The alternate questionnaire for ages 5 and under is designed to keep the child engaged through the activity of drawing and to indirectly draw out information that may speak to the below topics. For example, children are asked how they are feeling and to select a picture or draw how they are feeling and the interviewer will then ask unscripted follow-up questions based on the child’s response. If the child were to indicate that they were feeling sick, this would touch on the Medical topic and the interview would ask follow-up questions to see what the child remembers the program doing to address their illness (and also follow up with program staff to ensure the child is being appropriately treated). If the child were to say they are bored, that would touch on Recreation/Structured Leisure Activities and the interviewer would ask follow-up questions about what activities the child remembers participating in to see if the reason child is bored is due to issues with the program’s recreation programming.

The alternate version does not change the purpose of the data collection, the intended uses of the data, and does not impact burden estimates.