

Monitoring and Compliance for ORR Care Provider Facilities

**OMB Information Collection Request
0970 - 0564**

Supporting Statement Part A - Justification

August 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 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. Two instruments will be incorporated into ORR's new case management system, UC Path. Details about requested revisions, including removal of 11 instruments from the collection, are described in section A15.

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

ORR's UC Program provides care and custody for UC 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 UC in ORR custody. Care provider facilities are State-licensed, 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.

This request is to continue use of several instruments directly related to the care of UC. 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. Details about requested revisions, including removal of 11 instruments from the collection, are described in section A15. The 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)

- UC Incident Review (Form M-5A)
- Adult Incident Review (Form M-5B)
- Site Visit Guides (Forms M-7A to M-7F)
- 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-12E)
- 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 [ORR Policy Guide Section 5.5 Monitoring and Compliance](#).

- **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 UC; 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.

- **UC 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.

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) sub-grantees).

- **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)**

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-11O)**

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 UC.

- **UC Questionnaire – Ages 6-12 Years Old (Form M-12A)**
- **UC Questionnaire – Ages 13 and Older (Form M-12B)**
- **Long Term Foster Care Client Questionnaire (Form M-12C)**
- **Secure Client Questionnaire (Form M-12D)**
- **UC Questionnaire – Ages 5 and Under (Form M-12E)**

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, UC Path. UC Path will streamline information management by consolidating UC 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 UC Path for the system's first round of development. One instrument will be partially available in UC Path and partially available in Excel format (the Excel portion will be incorporated into UC 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
- 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)
- UC Incident Review (Form M-5A)
- Adult Incident Review (Form M-5B)

Word Instruments

- Corrective Action Report (Form M-1)
- Site Visit Guides (Forms M-7A to M-7F)
- Program Staff Questionnaires (Forms M-11A to M-11O)
- Child Questionnaires (Forms M-12A to M-12E)
- Service Provider Questionnaires (Forms M-13A to M-13E)

UC Path Instruments

- Out-of-Network Site Visit Report (Form M-3B) – UC 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, pages 6340-6343, and provided a sixty-day period for public comment. During the notice and comment period, responses were received from one commenter, containing multiple comments. Attachment A provides a summary of those comments and ORR's responses.

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 *UC 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	13.00	1,209.00	\$38.42	\$46,449.78
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
Program Staff Questionnaires (Form M-	756	1.0	1.00	756.00	\$38.42	\$29,045.52

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
11A-K)						
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-11O)	30	1.0	0.75	22.50	\$38.42	\$864.45
UC Questionnaires (Forms M-12A, M-12B, and M-12E)	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	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
and Post-Release Services Caseworker 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 Annual Burden Hours Total:				6,927.95	Estimated Annual Cost Total:	\$266,171.84

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
Site Visit and Remote Monitoring Site Visit Guides (Forms M-7A to M-7B)	4	7.0	29.00	812.00	\$38.42	\$31,197.04
LTFC Site Visit and LTFC Remote Monitoring	4	1.0	21.00	84.00	\$38.42	\$3,227.28

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
Site Visit Guides (Forms M-7C to M-7D)						
HS/PRS Site Visit Guide (Form M-7E)	4	2.0	21.00	168.00	\$38.42	\$6,454.56
Voluntary Agency Site Visit Guide (Form M-7F)	4	0.4	28.00	44.8	\$38.42	\$1,721.22
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 Home Finder Questionnaire (Form M-11M)	4	1.0	1.00	4.00	\$38.42	\$153.68
Long Term	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
Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)						
Long Term Foster Care Foster Parent Questionnaire (form M-11O)	4	2.0	0.75	6.00	\$38.42	\$230.52
UC Questionnaires (Forms M-12A, M-12B, and M-12E)	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	4	1.0	0.75	3.00	\$38.42	\$115.26

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
Provider Questionnaire (Form M-13D)						
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
Estimated Annual Burden Hours Total:				4,091.40	Estimated Annual Cost Total:	\$157,191.59

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	45	58.0	1.25	3,262.50	\$82.74	\$269,939.25

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
Compliance and Safety Site Visit Report (Form M-3A)						
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 (Forms M-4A to M4B)	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
Site Visit and Remote Monitoring Site Visit Guides (Forms M-7A to M-7B)	10	7.0	29.00	2,030.00	\$82.74	\$167,962.20
LTFC Site Visit and LTFC Remote Monitoring Site Visit Guides (Forms M-7C to M-7D)	10	1.0	21.00	210.00	\$82.74	\$17,375.40
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
Personnel File Checklist (Form M-10A)	10	31.0	1.00	310.00	\$82.74	\$25,649.40
Supplement to Personnel File	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
Checklist (Form M-10B)						
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 M-11A-K)	10	54.0	1.00	540.00	\$82.74	\$44,679.60
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-11O)	10	2.0	0.75	15.00	\$82.74	\$1,241.10
UC Questionnaires (Forms M-	10	33.0	0.50	165.00	\$82.74	\$13,652.10

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
12A, M-12B, and M-12E)						
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 Annual Burden Hours Total:	10,325.69	Estimated Annual Cost Total:	\$854,347.59

15. Explanation for Program Changes or Adjustments

ORR proposes the following revisions:

- Replace the term “unaccompanied alien child (UC)” with “unaccompanied child (UC)” throughout the instruments in this collection. Note that the screenshots of UC Path instruments attached to this memo do not reflect this change because it has not yet been developed in the system. However, the revision in terminology will be made before the system is launched.
- **UC Incident Review (Form M-5A)** – Change the full name of the form from “Sexual Abuse and Sexual Harassment UAC Incident Review” to “PSA UC Incident Review.”
- **Adult Incident Review (Form M-5B)** – Change the full name of the form from “Sexual Abuse and Sexual Harassment Adult Incident Review” to “PSA Adult Incident Review.”
- **UC Questionnaires (Forms M-12A, M-12B, and M-12E)** – Add a new version of the questionnaire designed for children ages 5 and under. Translate all three versions of the questionnaire into Spanish.
- **Secure Client Questionnaire (Form M-12D)** – Reformat the form, update the directions, and re-phrased some of the questions so that they are in line with ORR’s other child questionnaires (Forms M12-A to M-12C).
- **Shelter Site Visit Guide (Form M-7A)** – Revised question 6 in the Background Checks section to request a background check list for all staff, not just staff hired within the past two years. The average burden minutes per response was increased from 12 hours to 13 hours for respondents and from 28 hours to 29 hours for federal and contractor monitors.
- Remove the following instruments from the information collection. These instruments will be completed by federal staff as part of their normal job duties and by less than 10 contractor staff. Therefore, they are no longer subject to PRA requirements.
 - 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)
 - UC Case File Checklist (Form M-8A)
 - Long Term Foster Care Case File Checklist (Form M-8B)

- o Home Study and Post-Release Services Case File Checklist (Form M-8C)
- o Secure and Staff Secure Addendum to Case File Checklist (Form M-8D)
- o On Site Monitoring Checklist (Form M-9A)
- o Foster Home On Site Monitoring Checklist (Form M-9B)
- o Post-Release Services Home Observation (Form M-9C)

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.