**To:** Jordan Cohen

Office of Information and Regulatory Affairs (OIRA)

 Office of Management and Budget (OMB)

**From:** Kirsten Buckley

Office of Refugee Resettlement

 Administration for Children and Families (ACF)

**Date:** May 9, 2022

**Subject:** NonSubstantive Change Request – Initial Medical Exam Form and Dental Exam Form (OMB #0970-0466)

This memo requests approval of nonsubstantive changes to the approved information collection, Initial Medical Exam Form and Dental Exam Form (OMB #0970-0466)

***Background***

On December 10, 2020, the Office of Refugee Resettlement (ORR) within the Administration for Children and Families received approval to collect information on a standardized Initial Medical Exam performed on all unaccompanied children within 2 business days of admission into ORR custody. The Initial Medical Exam is performed by a mid-level medical professional or higher and includes a psychosocial risk evaluation that is used to identify potential mental health concerns or symptoms. To capture these concerns and symptoms, disorder-based mental health diagnosis options were listed in the Behavioral and Mental Health Concerns category within the Diagnosis section of the current Initial Medical Exam Form. However, since the date of approval, an ORR Behavioral and Mental Health Team comprised of licensed mental health professionals was created and after careful consideration, the Team believes the current format may cause a child to be prematurely and inappropriately labeled with a mental health disorder. Per ORR guidelines, a child identified with a symptom-based diagnosis at the Initial Medical Exam would be referred to a specialist for evaluation and a disorder-based diagnosis which would be captured in the Health Assessment form (OMB #0970-0509). Therefore, ORR feels that it is in the best interest of the child to provide symptom-based mental health diagnoses in lieu of disorder-based diagnoses on the Initial Medical Exam Form.

***Overview of Requested Changes***

ORR is requesting to replace all disorder-based mental health diagnoses with symptom-based diagnoses in the Behavioral and Mental Health Concerns category within the Diagnosis section of the current Initial Medical Exam Form. An overview of the requested changes is provided in the following table and we have provided an updated form with this submission.

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| --- | --- |
| **Behavioral and Mental Health Concerns Category** | **Proposed Update** |
| Hallucinations | No Change |
| Nonconsensual sexual activity | No Change |
| Other (with specify field) | No Change |
| Separation Anxiety Disorder | Change to "Anxiety symptoms (e.g., panic attacks, excessive worry/fear)" |
| Self-injury/cutting | Change to "Urge for/current self-harm" |
| Behavioral concerns (e.g., aggression, trouble following rules) | Add |
| Delusions | Add |
| Depressive symptoms | Add |
| Manic symptoms (e.g., elated mood, pressured speech) | Add |
| Social/Emotional delay | Add |
| Trauma symptoms (e.g., nightmares, flashbacks) | Add |
| Urge for/current harm to others  | Add |
| History of psychiatric diagnoses or treatment | Add, to include a free text "Specify" field |
| ADHD/ADD | Remove from IME form |
| Adjustment disorder | Remove from IME form |
| Autism | Remove from IME form |
| Bipolar disorder | Remove from IME form |
| Borderline personality disorder | Remove from IME form |
| Conduct disorder | Remove from IME form |
| Depressive disorder | Remove from IME form |
| Eating disorder | Remove from IME form |
| Generalized anxiety disorder | Remove from IME form |
| Obsessive-Compulsive Disorder | Remove from IME form |
| Oppositional Defiant Disorder | Remove from IME form |
| Panic disorder | Remove from IME form |
| PTSD | Remove from IME form |
| Schizophrenia | Remove from IME form |
| Suicide ideation/attempt | Remove from IME form |