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Office of Management and Budget (OMB)

From: Kirsten Buckley
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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.

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