

# **Monitoring and Compliance for ORR Care Provider Facilities**

**OMB Information Collection Request  
0970 - 0564**

## **Supporting Statement Part A - Justification**

**September 2022**

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

## SUPPORTING STATEMENT A – JUSTIFICATION

The Administration for Children and Families (ACF) is requesting emergency review and approval of this information collection by OMB, as authorized under 44 U.S.C. 3507(subsection j). The proposed forms are necessary to allow the Office of Refugee Resettlement (ORR) 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. The information collected is essential to the mission of the agency and an unanticipated event has occurred that could reasonably result in public harm if normal Paperwork Reduction Act (PRA) clearance procedures are followed. Recent legislation in Texas (Proclamation by the Governor of the State of Texas, May 31, 2021) and Florida (Emergency Rule 65CER21-3, December 10, 2021) has resulted in a large number of ORR facilities no longer being licensed by the states. To help mitigate the issue, ORR plans to perform quarterly monitoring visits to Texas and Florida programs. In order to implement the quarterly monitoring, ORR needs to add alternate versions of 15 forms in this information collection and reinstate three forms. See A1, A2, and A15, below, for additional details.

### 1. Circumstances Making the Collection of Information Necessary

The 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. Generally, care provider facilities are State-licensed (with the exception of facilities located in states that are unwilling to license them and temporary emergency 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 uses several instruments directly related to the care of UC. The instruments in this information collection allow the 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.

ORR plans to perform quarterly monitoring visits for care providers located in states that are unwilling to license programs providing care to UC. These visits will be performed by ORR contractor monitors. **The quarterly monitoring visits are in addition to and do not take the place of ORR's existing monitoring activities as described in [UC Policy Guide Section 5.5](#).** In order to implement these quarterly monitoring visits, ORR needs to make minor edits to 15 existing forms under this information collection to create the following alternate versions to be used by ORR contractor monitors:

- Unlicensed Facility Site Visit Guide (Form M-7A-UF)
- Unlicensed Facility Personnel File Checklist (Form M-10A-UF)
- Unlicensed Facility Program Director Questionnaire (Form M-11A-UF)
- Unlicensed Facility Clinician Questionnaire (Form M-11C-UF)
- Unlicensed Facility Case Manager Questionnaire (Form M-11E-UF)
- Unlicensed Facility Education Staff Questionnaire (Form M-11G-UF)
- Unlicensed Facility Medical Coordinator Questionnaire (Form M-11I-UF)

- Unlicensed Facility Youth Care Worker Questionnaire (Form M-11J-UF)
- Unlicensed Facility Prevention of Sexual Abuse Compliance Manager Staff Questionnaire (Form M-11K-UF)
- Unlicensed Facility Interpreter Questionnaire (Form M-11P-UF)
- Unlicensed Facility UC Questionnaire – Ages 6-12 Years Old (Forms M-12A-UF and M-12A-UFs)
- Unlicensed Facility UC Questionnaire – Ages 13 and Older (Forms M-12B-UF and M-12B-UFs)
- Unlicensed Facility UC Questionnaire – Ages 5 and Under (Form M-12E-UF and M-12E-UFs)
- Unlicensed Facility Legal Service Provider Questionnaire (Form M-13C-UF)
- Unlicensed Facility Case Coordinator Questionnaire (Form M-13E-UF)

Additionally, ORR is adding the below form (currently approved under OMB #0970-0558) to this information collection, as well as alternate version to facilitate the quarterly monitoring on unlicensed programs.

- Interpreter Questionnaire (Form M-11P)

Finally, ORR will now use the following forms with more than nine respondents. These were previously approved by OMB but were removed from the information collection due to the number of respondents.

- Unlicensed Facility Monitoring Notes (Form M-6A-UF)
- Unlicensed Facility UC Case File Checklist (Form M-8A-UF)
- Unlicensed Facility Onsite Monitoring Checklist (M-9A-UF)

### **Legal Authorities**

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 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).

## 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, ORR contractor monitors, 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.

### Monitoring Notes

[NEW FOR THIS REQUEST] This instrument is used by ORR contractor monitors to compile comprehensive notes and information for unlicensed facility quarterly health and safety site visits.

- **Unlicensed Facility Monitoring Notes (Form M-6A-UF)**

### Site Visit Guides

These instruments are completed by care provider staff as part of the pre-monitoring process for biennial site visits and provides 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)**

**[NEW FOR THIS REQUEST]** This instrument is completed by care provider staff as part of the pre-monitoring process for unlicensed facility quarterly health and safety site visits and provides ORR contractor monitors with information and supporting documents related to the overall functioning and oversight of the care provider program.

- **Unlicensed Facility Site Visit Guide (Form M-7A-UF)**

#### **Case File Checklists**

**[NEW FOR THIS REQUEST]** This instrument is used by ORR contractor monitors Team during unlicensed facility quarterly health and safety site visits to document care provider compliance with ORR policies and procedures related to case file maintenance.

- **Unlicensed Facility UC Case File Checklist (Form M-8A-UF)**

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

**[NEW FOR THIS REQUEST]** This instrument is used by ORR contractor monitors to document their findings during the walkthrough portion of unlicensed facility quarterly health and safety site visits.

- **Unlicensed Facility Onsite Monitoring Checklist (Form M-9A-UF)**

#### **Personnel File Checklists**

These instruments are completed by care provider staff and ORR Monitoring Team 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)**

**[NEW FOR THIS REQUEST]** This instrument is completed by care provider staff and ORR contractor monitors during unlicensed facility quarterly health and safety site visits to ensure that programs are meeting ORR policies and procedures related to the maintenance of personnel files.

- **Unlicensed Facility Personnel File Checklist (Form M-10A-UF)**

### **Program Staff Questionnaires**

These instruments are used by ORR Monitoring Team 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)**
- **Interpreter Questionnaire (Form M-11P)**

[NEW FOR THIS REQUEST] These instruments are used by ORR contractor monitors during unlicensed facility quarterly health and safety site visits to interview and document responses from various care provider program staff.

- **Unlicensed Facility Program Director Questionnaire (Form M-11A-UF)**
- **Unlicensed Facility Clinician Questionnaire (Form M-11C-UF)**
- **Unlicensed Facility Case Manager (Form M-11E-UF)**
- **Unlicensed Facility Education Staff Questionnaire (Form M-11G-UF)**
- **Unlicensed Facility Medical Coordinator Questionnaire (Form M-11I-UF)**
- **Unlicensed Facility Youth Care Worker (Form M-11J-UF)**
- **Unlicensed Facility Prevention of Sexual Abuse Compliance Manager Staff Questionnaire (Form M-11K-UF)**
- **Unlicensed Facility Interpreter Questionnaire (Form M-11P-UF)**

### **Child Questionnaires**

These instruments are used by ORR Monitoring Team staff during biennial site visits to interview and document responses from UC.

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

[NEW FOR THIS REQUEST] These instruments are used by ORR contractor monitors during unlicensed facility quarterly health and safety site visits to interview and document responses from UC.

- **UC Questionnaire – Ages 6-12 Years Old – Unlicensed Facility Quarterly Health and Safety Visit (Form M-12A-UF and M-12As-UF)**
- **UC Questionnaire – Ages 13 and Older – Unlicensed Facility Quarterly Health and Safety Visit (Form M-12B-UF and M-12Bs-UF)**
- **UC Questionnaire – Ages 5 and Under – Unlicensed Facility Quarterly Health and Safety Visit (Form M-12E-UF and M-12Es-UF)**

#### **Service Provider Questionnaires**

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

- **Home Study and Post-Release Services Director Questionnaire (Form M-13A)**
- **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)**

[NEW FOR THIS REQUEST] These instruments are used by ORR contractor monitors during unlicensed facility quarterly health and safety site visits to interview and document responses from various service providers.

- **Legal Service Provider Questionnaire – Unlicensed Facility Quarterly Health and Safety Visit (Form M-13C-UF)**
- **Case Coordinator Questionnaire – Unlicensed Facility Quarterly Health and Safety Visit (Form M-13E-UF)**

#### **Monitoring Visit Planning**

These instruments are used by ORR Monitoring Team 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 streamlining information management by consolidating UC information from disparate storage locations, reducing manual paperwork processing conducted outside of the system (e.g., spreadsheets, PDFs, Word documents), maximizing the use of auto-population so that information is not entered more than once, enforcing business rules through automated workflow management, and improving business intelligence capabilities by automating reporting and data analytics. Two instruments in this collection will be incorporated into ORR's case management system. 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)
- 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)

#### **Case Management System Instruments**

- 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 alerted the public to a request for emergency approval for six months of data collection and provided a sixty-day comment period related to the full request that will be submitted to continue data collection beyond six months. A full request will document any comments received and how ACF has considered the comments.

## **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.
- Care Provider grantees in Texas and Florida receive quarterly monitoring from ORR contract monitors.
- ORR employs approximately 18 contractor monitors and 10 Federal monitors.
- The cost to respondents was calculated using wage data from May 2021, for the Bureau of Labor Statistics (BLS) job code 21-1021 Child, Family, and School Social . 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**

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
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
Unlicensed	56	4.0	1.00	224.00	\$38.42	\$8,606.08

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
Facility Site Visit Guide (Form M-7A-UF)						
Unlicensed Facility UC Case File Checklist (Form M-8A-UF)	56	20.0	1.00	1,120.00	\$38.42	\$43,030.40
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-11O)	30	1.0	0.75	22.50	\$38.42	\$864.45
Interpreter Questionnaire (Form M-11P)	115	2.0	0.50	115.00	\$38.42	\$4,418.30
Unlicensed Facility Program Staff Questionnaires (Forms M-	56	32.0	1.00	1,792.00	\$38.42	\$68,848.64

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
11A-UF to M-11K-UF)						
Unlicensed Facility Interpreter Questionnaire (Form M-11P-UF)	56	4.0	0.50	112.00	\$38.42	\$4,303.04
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
Unlicensed Facility UC Questionnaires (M-12A-UF to M-12B-UF & M-12E-UF)	1,120	1.0	0.50	560.00	\$38.42	\$21,515.20
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 Questionnaire (Form M-13B)	90	1.0	1.00	90.00	\$38.42	\$3,457.80
Legal Service Provider Questionnaire (Form M-13C)	93	1.0	1.00	93.00	\$38.42	\$3,573.06

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
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
Unlicensed Facility Legal Service Provider Questionnaire (Form M-13C-UF)	224	1.0	0.75	168.00	\$38.42	\$8,606.08
Unlicensed Facility Case Coordinator Questionnaire (Form M-13E-UF)	224	1.0	1.00	224.00	\$38.42	\$8,606.08
<b>Estimated Annual Burden Hours Total:</b>				<b>14,063.65</b>	<b>Estimated Annual Cost Total:</b>	<b>\$664,648.10</b>

**Estimated Burden Hours and Opportunity Costs for Contractor Monitors – Unlicensed Facilities**

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
Unlicensed Facility Monitoring Notes (Form M-6A-UF)	18	12.0	12.00	2,592.00	\$47.26	\$122,497.92
Unlicensed Facility Site Visit Guide (Form M-7A-UF)	18	12.0	29.00	6,264.00	\$47.26	\$296,036.64

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
Unlicensed Facility UC Case File Checklist (Form M-8A-UF)	18	62.0	6.00	6,696.00	\$47.26	\$316,452.96
Unlicensed Facility On-Site Monitoring Checklist (Form M-9A-UF)	18	12.0	4.00	864.00	\$47.26	\$40,832.64
Unlicensed Facility Personnel File Checklist (Form M-10A-UF)	18	50.0	1.00	900.00	\$47.26	\$42,534.00
Unlicensed Facility Program Staff Questionnaires (Forms M-11A-UF to M-11K-UF)	18	100.0	1.00	1,800.00	\$47.26	\$85,068.00
Unlicensed Facility Interpreter Questionnaire (Form M-11P-UF)	18	12.0	0.50	108.00	\$47.26	\$5,104.08
Unlicensed Facility UC Questionnaires (Forms M-12A-UF to M-12B-UF & M-12E-UF)	18	62.0	0.50	558.00	\$47.26	\$26,371.08
Unlicensed Facility Legal Service Provider Questionnaire (Form M-13C-UF)	18	12.0	0.75	162.00	\$47.26	\$7,656.12
Unlicensed	18	12.0	1.00	216.00	\$47.26	\$10,208.16

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
Facility Case Coordinator Questionnaire (Form M-13E-UF)						
			<b>Estimated Annual Burden Hours Total:</b>	<b>20,160.00</b>	<b>Estimated Annual Cost Total:</b>	<b>\$952,761.60</b>

**Estimated Burden Hours and Opportunity Costs for Contractor Monitors – Previously Approved for Licensed Facilities**

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
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 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
Voluntary Agency Site Visit Guide (Form M-7F)	4	0.4	28.00	44.8	\$38.42	\$1,721.22
Personnel File	4	31.0	1.00	124.00	\$38.42	\$4,764.08

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
Checklist (Form M-10A)						
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 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-11O)	4	2.0	0.75	6.00	\$38.42	\$230.52



<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Annual Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Annual Total Cost</b>
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 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	4	0.3	0.33	0.40	\$38.42	\$15.37

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
Schedule (Form M-15)						
<b>Estimated Annual Burden Hours Total:</b>				<b>4,091.40</b>	<b>Estimated Annual Cost Total:</b>	<b>\$157,191.59</b>

### 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	45	58.0	0.17	443.70	\$82.74	\$36,711.74

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Federal Staff Burden Hours per Response</b>	<b>Annual Total Federal Staff Burden Hours</b>	<b>Average Federal Staff Hourly Wage</b>	<b>Annual Total Federal Staff Cost</b>
(Forms M-4A to M4B)						
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 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	10	2.0	0.50	10.00	\$82.74	\$827.40

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Federal Staff Burden Hours per Response</b>	<b>Annual Total Federal Staff Burden Hours</b>	<b>Average Federal Staff Hourly Wage</b>	<b>Annual Total Federal Staff Cost</b>
Checklist (Form M-10D)						
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
Interpreter Questionnaire (Form M-11P)	10	11.5	0.50	57.50	\$82.74	\$4,804.70
UC Questionnaires (Forms M-12A, M-12B, and M-12E)	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	10	0.4	0.50	2.00	\$82.74	\$165.48

<b>Information Collection Title</b>	<b>Annual Number of Respondents</b>	<b>Annual Number of Responses per Respondent</b>	<b>Average Federal Staff Burden Hours per Response</b>	<b>Annual Total Federal Staff Burden Hours</b>	<b>Average Federal Staff Hourly Wage</b>	<b>Annual Total Federal Staff Cost</b>
(Form M-12D)						
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 (Form M-15)	10	0.3	0.33	0.99	\$82.74	\$81.91
<b>Estimated Annual Burden Hours Total:</b>				<b>10,373.19</b>	<b>Estimated Annual Cost Total:</b>	<b>\$859,105.14</b>

## 15. Explanation for Program Changes or Adjustments

ORR added Interpreter Questionnaire (Form M-11P), which is currently approved under OMB #0970-0558, to this information collection.

ORR added the following forms that were previously approved by OMB but were removed from the information collection due to the number of respondents. Differences between the previously approved versions and the current versions that will be used by contractor monitors are as noted below.

- **Monitoring Notes (Form M-6A-UF)**
  - Directions added to top of form.
- **UC Case File Checklist (Form M-8A-UF)**
  - Added a Read Me tab with directions.
  - Added a summary tab that auto-sums data from other tabs.
  - Revised the formatting of the UC Services tab.
- **On Site Monitoring Checklist (M-9A-UF)**
  - Removed section on mosquito control.
  - Under Documents that Should be Posted – Removed reference to two discontinued items.
  - Under Other – Removed reference to mosquito repellent.
  - Under Logs/Schedules – Removed reference to the discontinued UC Temperature Tracker.

ORR added the below-listed alternate versions of forms already approved under this information collection. Differences between the already approved versions and the alternate versions that will be used by contractor monitors are noted below. **Unlicensed programs will continue to receive comprehensive biennial monitoring visits pursuant to [UC Policy Guide Section 5.5.1](#) during which the full original versions of these forms will be used.** Quarterly monitoring visits will mainly focus on health and safety. To align with that purpose and help streamline forms that will be administered more often than their full version counterparts, adjustments made to the alternate versions removed some items related to program management. Other adjustments were made for clarity or to align with current ORR policy and procedures. Quarterly monitoring visits will continue to monitor the same areas related to child welfare practices and provision of services as biennial monitoring visits.

- **Site Visit Guide (Form M-7A-UF)**
  - Under Child Protection – Added requirement for program to provide link to mandatory reporting laws/rules and specify who is classified as a mandatory reported in the state in which the program is located.
  - Under Background Checks – Clarified that information on foster parents is also required.
  - Removed reference to mosquito control inspections.
- **Personnel File Checklist (Form M-10A-UF)**
  - Under General Documentation – Removed job description; employment application; personal and professional references; educational records; professional licensure; and I-9 documents.
- **Program Director Questionnaire (Form M-11A-UF)**

- Removed question on what changes the program director envisions for the program in the next year.
- Modified the question that asks how the program incorporates input from others to assess the program. Previously, the question asked how input from minors, staff, program partners, legal services providers, and sponsor is used. Now the question only asks how input from minors and staff is used.
- **Clinician Questionnaire (Form M-11C-UF)**
  - Removed question on what system the clinician uses to document clinical sessions.
  - Removed question asking clinician to describe their relationship with their supervisor.
- **Case Manager Questionnaire (Form M-11E-UF)**
  - Removed question asking case manager to describe their relationship with their supervisor.
- **Education Staff Questionnaire (Form M-11G-UF)**
  - No modifications made.
- **Medical Coordinator Questionnaire (Form M-11I-UF)**
  - Removed question asking medical coordinator to describe their relationship with their supervisor.
- **Youth Care Worker Questionnaire (Form M-11J-UF)**
  - Removed question on access to UC Portal.
  - Removed question on how often staff meetings are held.
  - Removed question asking youth care worker to describe their relationship with their supervisor.
- **Prevention of Sexual Abuse Compliance Manager Staff Questionnaire (Form M-11K-UF)**
  - No modifications made.
- **Interpreter Questionnaire (Form M-11P-UF)**
  - No modifications made.
- **UC Questionnaire – Ages 6-12 Years Old (Forms M-12A-UF and M-12As-UF)**
  - Under Communication with Family – Added question on how often and how long the child speaks with their family.
  - Removed placeholder sections on meetings with case management and clinical staff, which are not asked of children ages 6-12.
- **UC Questionnaire – Ages 13 and Older (Forms M-12B-UF and M-12Bs-UF)**
  - Under Admission/Orientation – Removed question asking what the child remembers about documents signed/received during the first couple days.
  - Under Communication with Family – Added question on how often and how long the child speaks with their family. Removed question on sending/receiving mail and email.

- **UC Questionnaire – Ages 5 and Under (Form M-12E-UF and M-12Es-UF)**
  - No modifications made.
- **Legal Service Provider Questionnaire (Form M-13C-UF)**
  - Reworded questions on ability to perform KYRs and legal screenings.
  - Removed question that asks legal service providers with which care provider staff members they have regular interactions and/or communication.
  - Removed questions method used to inform legal service providers of incidents affecting the child’s legal case.
- **Case Coordinator Questionnaire (Form M-13E-UF)**
  - No modifications made.

**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.