

Monitoring and Compliance for ORR Care Provider Facilities

**OMB Information Collection Request
0970 - 0564**

Supporting Statement Part A - Justification

May 2023

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

Summary

The proposed forms in this information collection 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.

This information collection was originally approved under emergency approval for six months, as authorized under 44 U.S.C. 3507(subsection j), due to an unanticipated event that could have reasonably resulted in public harm if normal Paperwork Reduction Act (PRA) clearance procedures were followed. Legislation in Texas (Proclamation by the Governor of the State of Texas, May 31, 2021) and Florida (Emergency Rule 65CER21-3, December 10, 2021) resulted in a large number of ORR facilities no longer being licensed by the states. To help mitigate the issue, ORR implemented quarterly monitoring visits to Texas and Florida programs. In order to implement the quarterly monitoring, ORR submitted and received emergency approval to add alternate versions of 15 forms in this information collection and reinstate three forms.

This request is to continue data collection for all forms under this OMB number, including those approved under emergency approval. Revisions are proposed to some forms as described in sections A1, A2, and A15.

1. Circumstances Making the Collection of Information Necessary

The UC Program provides care and custody for unaccompanied children 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 children 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 unaccompanied children. 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.

Quarterly Site Visits of Unlicensed Facilities

ORR plans to perform quarterly monitoring visits for care providers located in states that are unwilling to license programs providing care to unaccompanied children. 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 made 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 Unaccompanied Child Questionnaire – Ages 6-12 Years Old (Forms M-12A-UF and M-12A-UFs) *
- Unlicensed Facility Unaccompanied Child Questionnaire – Ages 13 and Older (Forms M-12B-UF and M-12B-UFs) *
- Unlicensed Facility Unaccompanied Child 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 added the below form (previously 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 reinstated the following forms as the number of respondents increased to more than nine respondents.

- Unlicensed Facility Monitoring Notes (Form M-6A-UF) *
- Unlicensed Facility Foster Care¹ Monitoring Notes (Form M-6C-UF)
- Unlicensed Facility Unaccompanied Child Case File Checklist (Form M-8A-UF) *
- Unlicensed Facility Foster Care Unaccompanied Child Case File Checklist (Form M-8B-UF)
- Unlicensed Facility Staff Secure Addendum to Case File Checklist (Form M-8D-UF)
- Unlicensed Facility Onsite Monitoring Checklist (M-9A-UF) *
- Unlicensed Facility Foster Home Onsite Monitoring Checklist (M-9B-UF)

* Denotes instruments approved under emergency approval.

Quarterly Influx Care Facility Site Visits

ORR plans to perform quarterly monitoring visits for influx care facilities. 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 two existing forms under this information collection to create the following alternate version to be used by ORR contractor monitors:

- **Influx Care Facility Monitoring Site Visit Guide (Form M-7G)**

¹ The UC Program Monitoring Team uses foster care tools for both foster homes and group homes.

- **Influx Care Facility Personnel File Checklist (Form M-10E)**

Additionally, ORR will now use the following alternate version of the form with more than nine respondents. This form was previously approved by OMB but was removed from the information collection due to the number of respondents.

- **Influx Care Facility Monitoring Notes (Form M-6E)**

Prevention of Sexual Abuse (PSA) Audits

ORR is seeking OMB approval for the following instruments already in use for the purpose of auditing care provider compliance with the Interim Final Rule on Standards to Prevent, Detect, and Respond to Sexual Abuse and Sexual Harassment Involving Unaccompanied Children (45 CFR Part L).

- **Preaudit Questionnaire and Audit Documentation Requested Checklist (Form M-17A)**
- **Instructions for Site Visit and Facility Tour (Form M-17B)**
- **Interview Guide: Random Sample of Staff Interview (Form M-17C)**
- **Interview Guide: Program Director (Form M-17D)**
- **Interview Guide: Prevention of Sexual Abuse (PSA) Compliance Manager (Form M-17E)**
- **Interview Guide: Specialized Staff (Form M-17F)**
- **Interview Guide: Unaccompanied Child (Form M-17G)**
- **PSA Audit Corrective Action Report (Form M-17H)**

Revisions to Existing Forms

ORR proposes to revise the following instruments approved under this information collection:

- **FFS Compliance and Safety Site Visit Report (Form M-3A)**
- **PSA Unaccompanied Child Incident Review (Form M-5A)**
- **PSA Adult Incident Review (Form M-5B)**
- **Site Visit Guide (Form M-7A)**
- **Foster Care Site Visit Guide (Form M-7C) (formerly titled Long Term Foster Care (LTFC) Site Visit Guide)**
- **Personnel File Checklist (Form M-10A)**
- **Foster Parent Checklist (Form M-10D)**
- **Foster Parent Questionnaire (Form M-11O)**
- **Unaccompanied Child Questionnaire – Ages 6-12 Years Old (Form M-12As)**
- **Unaccompanied Child Questionnaire – Ages 13 and Older (Form M-12Bs)**

Additionally, ORR is requesting that the following instruments be removed from this information collection. Forms M-7B and M-7D were created for use during the height of the COVID-19 pandemic. Monitors have resumed in-person site visits and the instruments are no longer needed. Form M-7F is completed by less than 10 respondents.

- **Remote Monitoring Site Visit Guide (Form M-7B)**
- **Long Term Foster Care Remote Site Visit Guide (Form M-7D)**
- **Voluntary Agency Site Visit Guide (Form M-7F)**

Legal Authorities

The Homeland Security Act (HSA), 6 U.S.C. 279, transferred responsibilities for the care and placement of unaccompanied children 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 unaccompanied children should be placed and sets minimum standards for the housing, services, transportation, and discharge of unaccompanied children. *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 unaccompanied children in federal custody. The TVPRA also directs ORR to create policies to ensure children 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 unaccompanied children 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 [UC 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 unaccompanied children; 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 [UC Policy Guide Section 4.11 Incident Reviews and Data Collection](#) for related policies.

- **PSA Unaccompanied Child 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.
- **PSA 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

This instrument is used by ORR contractor monitors to compile comprehensive notes and information for unlicensed facility and influx care facility quarterly health and safety site visits.

- **Unlicensed Facility Monitoring Notes (Form M-6A-UF)**
- **Unlicensed Facility LTFC Monitoring Notes (Form M-6C-UF) – NEW FOR THIS REQUEST**
- **Influx Care Facility Monitoring Notes (Form M-6E) – NEW FOR THIS REQUEST**

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)**
- **Foster Care Site Visit Guide (Form M-7C) (formerly titled Long Term Foster Care Site Visit Guide)**
- **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)**

These instruments are completed by care provider staff as part of the pre-monitoring process for unlicensed facility and influx care facility quarterly health and safety site visits and provide 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)**
- **Influx Care Facility Site Visit Guide (Form M-7G) – NEW FOR THIS REQUEST**

Case File Checklists

These instruments are 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 Unaccompanied Child Case File Checklist (Form M-8A-UF)**
- **Unlicensed Facility Foster Care Unaccompanied Child Case File Checklist (Form M-8B-UF) – NEW FOR THIS REQUEST**
- **Unlicensed Facility Staff Secure Addendum to Case File Checklist (Form M-8D-UF) – NEW FOR THIS REQUEST**

On Site Monitoring Checklists

These instruments are 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)**
- **Unlicensed Facility Foster Home Onsite Monitoring Checklist (M-9B-UF) – NEW FOR THIS REQUEST**
- **Unlicensed Facility Staff Secure Addendum to Case File Checklist (Form M-9D-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)**
- **Foster Parent Checklist (Form M-10D)**

These instruments are completed by care provider staff and ORR contractor monitors during unlicensed facility and influx care 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)**
- **Influx Care Facility Personnel File Checklist (Form M-10E) – NEW FOR THIS REQUEST**

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)**
- **Foster Care Program Director Questionnaire (Form M-11B)**
- **Clinician Questionnaire (Form M-11C)**
- **Foster Care Clinician Questionnaire (Form M-11D)**
- **Case Manager Questionnaire (Form M-11E)**
- **Foster Care Case Manager Questionnaire (Form M-11F)**
- **Education Staff Questionnaire (Form M-11G)**
- **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)**
- **Foster Care Home Finder Questionnaire (Form M-11M)**
- **Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)**
- **Foster Care Foster Parent Questionnaire (Form M-11O)**
- **Interpreter Questionnaire (Form M-11P)**

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 unaccompanied children.

- **Unaccompanied Child Questionnaire – Ages 6-12 Years Old (Form M-12A and M-12As)**

- **Unaccompanied Child 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)**
- **Unaccompanied Child Questionnaire – Ages 5 and Under (Form M-12E and M-12Es)**

These instruments are used by ORR contractor monitors during unlicensed facility quarterly health and safety site visits to interview and document responses from unaccompanied children.

- **Unaccompanied Child Questionnaire – Ages 6-12 Years Old – Unlicensed Facility Quarterly Health and Safety Visit (Form M-12A-UF and M-12As-UF)**
- **Unaccompanied Child Questionnaire – Ages 13 and Older – Unlicensed Facility Quarterly Health and Safety Visit (Form M-12B-UF and M-12Bs-UF)**
- **Unaccompanied Child 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)**
- **Foster Care Legal Service Provider Questionnaire (Form M-13D)**
- **Case Coordinator Questionnaire (Form M-13E)**

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)**

Prevention of Sexual Abuse (PSA) Audit Tools

These instruments are used by contractor auditors to audit ORR care provider programs for compliance with the Interim Final Rule on Standards to Prevent, Detect, and Respond to Sexual Abuse and Sexual Harassment Involving Unaccompanied Children (45 CFR Part L). See [UC Policy Guide Section 4.12 Compliance Audits](#) for related policies. Care providers are audited once every three years.

- **Preaudit Questionnaire and Audit Documentation Requested Checklist (Form M-17A)**
- **Instructions for Site Visit and Facility Tour (Form M-17B)**
- **Interview Guide: Random Sample of Staff Interview (Form M-17C)**
- **Interview Guide: Program Director (Form M-17D)**
- **Interview Guide: Prevention of Sexual Abuse (PSA) Compliance Manager (Form M-17E)**
- **Interview Guide: Specialized Staff (Form M-17F)**
- **Interview Guide: Unaccompanied Child (Form M-17G)**
- **PSA Audit Corrective Action Report (Form M-17H)**

3. Use of Improved Information Technology and Burden Reduction

ORR is in the process of streamlining information management by consolidating unaccompanied children 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. One instrument will be converted from Excel to a digital web-based format. The remaining instruments will be available in either PDF, Word, or Excel format.

Excel Instruments

- 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)
- PSA Unaccompanied Child Incident Review (Form M-5A)
- PSA Adult Incident Review (Form M-5B)
- Prevention of Sexual Abuse Audit Tools (Forms M-17A to M-17H)

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)
- PSA Audit Corrective Action Report (Form M-17H)

Case Management System Instruments

- Monitoring Visit (Form M-14)
- Monitoring Schedule (Form M-15)

Digital Web-Based Instruments

FFS Compliance and Safety Site Visit Report (Form M-3A)

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 October 26, 2022, Volume 87, Number 206, pages 64798-64801, 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.

ACF published a second notice on March 21, 2023, Volume 88, Number 54, pages 16986-16989, and provided a sixty-day period for public comment for additional proposed revisions. No comments were received

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

Incident Reviews – Sensitive information may be collected in the *PSA Adult Incident Review* and *PSA Unaccompanied Child 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 may be collected depending upon what information the interviewee(s) chooses to divulge during the interview.

PSA Audits – Sensitive information may be collected in the *Interview Guide: Unaccompanied Child* by external auditors to ensure child safety and well-being as it relates to prevention of sexual abuse. However, these questions are voluntary, and children are informed that they may choose not to answer any or all of the questions. In addition, any sensitive and confidential information provided to auditors will include appropriate designations and limitations on further dissemination (45 CFR 411.111(n)). Auditors must also follow appropriate procedures for handling and safeguarding such information (45 CFR 411.111(n)). Finally, all auditors must complete both the cybersecurity training and the HHS Rules of Behavior, as well as completing FBI background checks prior to accessing any potentially sensitive information.

12. Estimates of Annualized Burden Hours and Costs

Estimates used to calculate burden are based on the following factors:

- ORR funds approximately 262 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 FY2022.
- 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 and influx care facilities receive quarterly monitoring from ORR contract monitors.
- ORR employs approximately 18 contractor monitors and 20 Federal monitors.
- The PSA Audit contract requires the contractor to complete 390 audits over a period of 5 years for an average of 78 audits per year.
- The cost to respondents was calculated using median hourly wage data from May 2021 (accessed in February 2023), 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 – $\$23.63 \times 2 = \47.26

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
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Corrective Action Report (Form M-1)	262	0.4	5.00	524.00	\$47.26	\$24,764.24
FFS Compliance and Safety Site Visit Report (Form M-3A)	262	12.0	1.00	3,144.00	\$47.26	\$148,585.44
Out-of-Network Site Visit Report (Form M-3B)	24	5.0	1.00	120.00	\$47.26	\$5,671.20
Checklist for a Child-Friendly Environment (Form M-4A to M-5B)	262	12.0	0.25	786.00	\$47.26	\$37,146.36
Incident Reviews (Forms M-5A to M-5B)	262	0.3	1.50	117.90	\$47.26	\$5,571.95
Site Visit Guide (Form M-7A)	114	1.0	13.00	1,482.00	\$47.26	\$70,039.32
Foster Care Site Visit Guide (Form M-7C)	18	1.0	6.00	108.00	\$47.26	\$5,104.08
Home Study and Post-Release Services Site Visit Guide (Form M-7E)	30	1.0	6.00	180.00	\$47.26	\$8,506.80
Influx Care Facility Monitoring Site Visit Guide (Form M-7G)	3	1.0	15.00	45.00	\$47.26	\$2,126.70
Unlicensed Facility Site Visit Guide (Form M-7A-UF)	56	4.0	1.00	224.00	\$47.26	\$10,586.24
Unlicensed Facility Unaccompanied Child Case File Checklist (Form M-8A-UF)	56	20.0	1.00	1,120.00	\$47.26	\$52,931.20
Unlicensed Facility Foster Care Unaccompanied Child Case File Checklist (Form M-8B-UF)	1	20.0	1.00	20.00	\$47.26	\$945.20
Unlicensed Facility Staff Secure Addendum to Case File Checklist (Form M-8D-UF)	2	20.0	1.00	40.00	\$47.26	\$1,890.40
Program Staff Questionnaires (Forms M-11A to M-11K)	917	1.0	1.00	917.00	\$47.26	\$43,337.42
Secure Detention Officer Questionnaire (Form M-11L)	1	1.0	1.00	1.00	\$47.26	\$47.26
Foster Care Home Finder Questionnaire (Form M-11M)	18	1.0	1.00	18.00	\$47.26	\$850.68
Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)	18	1.0	1.00	18.00	\$47.26	\$850.68
Foster Care Foster Parent Questionnaire (form M-11O)	35	1.0	0.75	26.25	\$47.26	\$1,240.58

Interpreter Questionnaire (Form M-11P)	115	2.0	0.50	115.00	\$47.26	\$5,434.90
Unlicensed Facility Program Staff Questionnaires (Forms M-11A-UF to M-11K-UF)	56	32.0	1.00	1,792.00	\$47.26	\$84,689.92
Unlicensed Facility Interpreter Questionnaire (Form M-11P-UF)	56	4.0	0.50	112.00	\$47.26	\$5,293.12
Unaccompanied Child Questionnaires (Forms M-12A to M-12B & M-12E)	563	1.0	0.50	281.50	\$47.26	\$13,303.69
Foster Care Client Questionnaire (M-12C)	88	1.0	0.50	44.00	\$47.26	\$2,079.44
Secure Client Questionnaire (Form M-12D)	5	1.0	0.50	2.50	\$47.26	\$118.15
Unlicensed Facility Unaccompanied Child Questionnaires (Forms M-12A-UF to M-12B-UF & M-12E-UF)	1,120	1.0	0.50	560.00	\$47.26	\$26,465.60
Home Study and Post-Release Services Director Questionnaire (Form M-13A)	30	1.0	1.00	30.00	\$47.26	\$1,417.80
Home Study and Post-Release Services Caseworker Questionnaire (Form M-13B)	90	1.0	1.00	90.00	\$47.26	\$4,253.40
Legal Service Provider Questionnaire (Form M-13C)	114	1.0	1.00	114.00	\$47.26	\$5,387.64
Foster Care Legal Service Provider Questionnaire (Form M-13D)	18	1.0	0.75	13.50	\$47.26	\$638.01
Case Coordinator Questionnaire (Form M-13E)	131	1.0	1.00	131.00	\$47.26	\$6,191.06
Unlicensed Facility Legal Service Provider Questionnaire (Form M-13C-UF)	224	1.0	1.00	224.00	\$47.26	\$10,586.24
Unlicensed Facility Case Coordinator Questionnaire (Form M-13E-UF)	224	1.0	1.00	224.00	\$47.26	\$10,586.24
Preaudit Questionnaire and Audit Documentation Requested Checklist (Form M-17A)	78	1.0	4.00	312.00	\$47.26	\$14,745.12
Instructions for Site Visit and Facility Tour (Form M-17B)	78	1.0	2.00	156.00	\$47.26	\$7,372.56

Interview Guide: Random Sample of Staff Interview (Form M-17C)	312	1.0	1.00	312.00	\$47.26	\$14,745.12
Interview Guide: Program Director (Form M-17D)	78	1.0	1.00	78.00	\$47.26	\$3,686.28
Interview Guide: PSA Compliance Manager (Form M-17E)	78	1.0	1.00	78.00	\$47.26	\$3,686.28
Interview Guide: Specialized Staff (Form M-17F)	156	1.0	1.00	156.00	\$47.26	\$7,372.56
Interview Guide: Unaccompanied Child (Form M-17G)	780	1.0	0.50	390.00	\$47.26	\$18,431.40
PSA Audit Corrective Action Report (Form M-17H)	78	1.0	1.00	78.00	\$47.26	\$3,686.28
			Estimated Annual Burden Hours Total:	14,184.65	Estimated Annual Cost Total:	\$670,366.56

Estimated Burden Hours and Opportunity Costs for Contractor Interim Final Rule Auditors

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
Preaudit Questionnaire and Audit Documentation Requested Checklist (Form M-17A)	8	48.0	3.00	1,152.00	\$47.26	\$54,443.52
Instructions for Site Visit and Facility Tour (Form M-17B)	8	48.0	1.00	384.00	\$47.26	\$18,147.84
Interview Guide: Random Sample of Staff Interview (Form M-17C)	8	48.0	1.00	384.00	\$47.26	\$18,147.84
Interview Guide: Program Director (Form M-17D)	8	48.0	1.00	384.00	\$47.26	\$18,147.84
Interview Guide: PSA Compliance Manager (Form M-17E)	8	48.0	1.00	384.00	\$47.26	\$18,147.84
Interview Guide: Specialized Staff (Form M-17F)	8	48.0	1.00	384.00	\$47.26	\$18,147.84
Interview Guide: Unaccompanied Child (Form M-17G)	8	48.0	0.50	192.00	\$47.26	\$9,073.92
PSA Audit Corrective	8	48.0	2.00	768.00	\$47.26	\$36,295.68

Action Report (Form M-17H)						
			Estimated Annual Burden Hours Total:	4,032.00	Estimated Annual Cost Total:	\$190,552.32

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

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
Unlicensed Facility Monitoring Notes (Form M-6A-UF)	18	12.0	12.00	2,592.00	\$47.26	\$122,497.92
Unlicensed Facility Foster Care Monitoring Notes (Form M-6C-UF)	18	0.2	12.00	43.20	\$47.26	\$2,041.63
Influx Care Facility Monitoring Notes (Form M-6E-UF)	18	0.7	12.00	151.20	\$47.26	\$7,145.71
Unlicensed Facility Site Visit Guide (Form M-7A-UF)	18	12.0	29.00	6,264.00	\$47.26	\$296,036.64
Influx Care Facility Monitoring Site Visit Guide (Form M-7G)	18	0.7	29.00	365.40	\$47.26	\$17,268.80
Unlicensed Facility Unaccompanied Child Case File Checklist (Form M-8A-UF)	18	62.0	6.00	6,696.00	\$47.26	\$316,452.96
Unlicensed Facility Foster Care Unaccompanied Child Case File Checklist (Form M-8B-UF)	18	1.0	6.00	108.00	\$47.26	\$5,104.08
Unlicensed Facility Staff Secure Addendum to Case File Checklist (Form M-8D-UF)	18	2.0	6.00	216.00	\$47.26	\$10,208.16
Unlicensed Facility Onsite Monitoring Checklist (Form M-9A-UF)	18	12.0	4.00	864.00	\$47.26	\$40,832.64
Unlicensed Facility Foster Home Onsite Monitoring Checklist (M-9B-UF)	18	0.4	4.00	28.80	\$47.26	\$1,361.09
Unlicensed Facility Personnel File Checklist	18	50.0	1.00	900.00	\$47.26	\$42,534.00

(Form M-10A-UF)						
Influx Care Facility Personnel File Checklist (Form M-10E)	18	3.0	1.00	54.00	\$47.26	\$2,552.04
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 Unaccompanied Child 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 Facility Case Coordinator Questionnaire (Form M-13E-UF)	18	12.0	1.00	216.00	\$47.26	\$10,208.16
			Estimated Annual Burden Hours Total:	21,126.60	Estimated Annual Cost Total:	\$998,443.12

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

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	\$47.26	\$103,972.00
Site Visit Guide (Form M-7A)	4	7.0	29.00	812.00	\$47.26	\$38,375.12
Foster Care Site Visit Guide (Form M-7C)	4	1.0	21.00	84.00	\$47.26	\$3,969.84

Home Study and Post-Release Services Site Visit Guide (Form M-7E)	4	2.0	21.00	168.00	\$47.26	\$7,939.68
Personnel File Checklist (Form M-10A)	4	31.0	1.00	124.00	\$47.26	\$5,860.24
Supplement to Personnel File Checklist (Form M-10B)	4	54.0	1.00	216.00	\$47.26	\$10,208.16
Home Study and Post-Release Services Personnel File Checklist (Form M-10C)	4	6.0	1.00	24.00	\$47.26	\$1,134.24
Foster Care Foster Parent Checklist (Form M-10D)	4	2.0	0.50	4.00	\$47.26	\$189.04
Program Staff Questionnaires (Forms M-11A to M-11K)	4	54.0	1.00	216.00	\$47.26	\$10,208.16
Secure Detention Officer Questionnaire (Form M-11L)	4	0.1	1.00	0.40	\$47.26	\$18.90
Foster Care Home Finder Questionnaire (Form M-11M)	4	1.0	1.00	4.00	\$47.26	\$189.04
Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)	4	1.0	1.00	4.00	\$47.26	\$189.04
Foster Care Foster Parent Questionnaire (form M-11O)	4	2.0	0.75	6.00	\$47.26	\$283.56
Unaccompanied Child Questionnaires (Forms M-12A to M-12B & M-12E)	4	33.0	0.50	66.00	\$47.26	\$3,119.16
Foster Care Client Questionnaire (M-12C)	4	5.0	0.50	10.00	\$47.26	\$472.60
Secure Client Questionnaire (Form M-12D)	4	0.4	0.50	0.80	\$47.26	\$37.81
Home Study and Post-Release Services Director Questionnaire (Form M-13A)	4	2.0	0.50	4.00	\$47.26	\$189.04
Home Study and Post-Release Services Caseworker Questionnaire (Form M-13B)	4	6.0	1.00	24.00	\$47.26	\$1,134.24
Legal Service Provider Questionnaire (Form M-13C)	4	7.0	1.00	28.00	\$47.26	\$1,323.28
Foster Care Legal Service Provider Questionnaire (Form M-13D)	4	1.0	0.75	3.00	\$47.26	\$141.78
Case Coordinator Questionnaire (Form M-13E)	4	8.0	1.00	32.00	\$47.26	\$1,512.32
Monitoring Visit (Form M-14)	4	8.0	0.50	16.00	\$47.26	\$756.16
Monitoring Schedule (Form M-15)	4	0.3	0.30	0.36	\$47.26	\$17.01
			Estimate d Annual Burden Hours Total:	4,046.5 6	Estimate d Annual Cost Total:	\$191,240.4 3

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)	140	1.0	22.00	3,080.00	\$86.08	\$265,126.40
FFS Compliance and Safety Site Visit Report (Form M-3A)	85	37.0	1.25	3,931.25	\$86.08	\$338,402.00
Out-of-Network Site Visit Report (Form M-3B)	85	1.0	1.00	85.00	\$86.08	\$7,316.80
Checklist for a Child-Friendly Environment (Form M-4)	85	37.0	0.17	534.65	\$86.08	\$46,022.67
Incident Reviews (Forms M-5A to M-5B)	5	15.0	2.00	150.00	\$86.08	\$12,912.00
Site Visit Guide (Form M-7A)	20	6.0	29.00	3,480.00	\$86.08	\$299,558.40
Foster Care Site Visit Guide (Form M-7C)	20	1.0	21.00	420.00	\$86.08	\$36,153.60
Home Study and Post-Release Services Site Visit Guide (Form M-7E)	20	2.0	21.00	840.00	\$86.08	\$72,307.20
Personnel File Checklist (Form M-10A)	20	26.0	1.00	520.00	\$86.08	\$44,761.60
Supplement to Personnel File	20	43.0	1.00	860.00	\$86.08	\$74,028.80

Checklist (Form M-10B)							
Home Study and Post-Release Services Personnel File Checklist (Form M-10C)	20	5.0	1.00	100.00	\$86.08	\$8,608.00	
Foster Care Foster Parent Checklist (Form M-10D)	20	2.0	0.50	20.00	\$86.08	\$1,721.60	
Program Staff Questionnaires (Forms M-11A to M-11K)	20	46.0	1.00	920.00	\$86.08	\$79,193.60	
Secure Detention Officer Questionnaire (Form M-11L)	20	0.1	1.00	2.00	\$86.08	\$172.16	
Foster Care Home Finder Questionnaire (Form M-11M)	20	1.0	1.00	20.00	\$86.08	\$1,721.60	
Foster Care Independent Living Life Skills Staff Questionnaire (Form M-11N)	20	1.0	1.00	20.00	\$86.08	\$1,721.60	
Foster Care Foster Parent Questionnaire (form M-11O)	20	2.0	0.75	30.00	\$86.08	\$2,582.40	
Interpreter Questionnaire (Form M-11P)	10	11.5	0.50	57.50	\$86.08	\$4,949.60	
Unaccompanied Child Questionnaires (Forms M-12A to M-12B & M-12E)	20	28.0	0.50	280.00	\$86.08	\$24,102.40	
Foster Care Client Questionnaire (M-12C)	20	4.0	0.50	40.00	\$86.08	\$3,443.20	
Secure Client Questionnaire (Form M-12D)	20	0.3	0.50	3.00	\$86.08	\$258.24	
Home Study and Post-Release Services Director Questionnaire (Form M-13A)	20	2.0	0.50	20.00	\$86.08	\$1,721.60	
Home Study and Post-Release Services Caseworker Questionnaire (Form M-13B)	20	5.0	1.00	100.00	\$86.08	\$8,608.00	
Legal Service	20	6.0	1.00	120.00	\$86.08	\$10,329.60	

Provider Questionnaire (Form M-13C)						
Foster Care Legal Service Provider Questionnaire (Form M-13D)	20	1.0	0.75	15.00	\$86.08	\$1,291.20
Case Coordinator Questionnaire (Form M-13E)	20	7.0	1.00	140.00	\$86.08	\$12,051.20
Monitoring Visit (Form M-14)	20	7.0	0.50	70.00	\$86.08	\$6,025.60
Monitoring Schedule (Form M-15)	20	0.2	0.33	1.32	\$86.08	\$113.63
PSA Audit Corrective Action Report (Form M-17H)	4	19.5	1.00	78.00	\$86.08	\$6,714.24
			Estimated Annual Burden Hours Total:	15,937.72	Estimated Annual Cost Total:	\$1,371,918.94

In addition, the cost over the life of the PSA audit contract, if all options were utilized, is \$25,570,901, which includes options to increase the numbers of audits completed each year of the contract should this be required.

15. Explanation for Program Changes or Adjustments

This request is to extend approval of previously approved forms and to incorporate changes under this OMB number. The revisions to forms are described below, including currently requested revisions and revisions already incorporated through the most recent emergency approval. ORR has also updated burden estimates to reflect current estimates for numbers of respondents and estimated response times.

CURRENT REVISIONS PROPOSED

Quarterly Unlicensed Facility Site Visits

ORR made the following revisions to forms that were approved under the recent emergency approval.

- **Unlicensed Facility Unaccompanied Child Case File Checklist (Form M-8A-UF)**
 - Admission Documents
 - Inventory of Property and Cash: Corrected timeframe to align with policy. the inventory log should be completed “within 2 hours of admission” not 24 hours.
 - Clothing and Supplies: Added language to clarify what is covered under this item.
 - Orientation Documents – Added new item checking for compliance with ORR’s access to reproductive health care policy (also known as the *Garza* policy).
 - Legal Information
 - Acknowledgement of Receiving Legal Resource Guide: Changed “within 24

- hours” to “within 24 hours of admission” to clarify the policy requirement.
 - EOIR Docs: Corrected name Executive Office for Immigration Review (“Review” was missing)
 - Medical Documents
 - Authorization for Medical, Dental, and Mental Health Care: Changed “within 24 hours” to “within 24 hours of admission” to clarify the policy requirement.
 - Documentation of Initial Medical Exam: Added “within 48 hours of admission” to clarify policy requirement. Updated form expiration dates referenced. Added reminder that completion of the exam form is mandatory.
 - Dental Exam Form: Updated form expiration dates referenced. Added reminder that completion of the form is mandatory.
 - Supplemental TB Screening Form: Updated form expiration dates referenced. Added reminder that completion of the form is mandatory.
 - Prescriptions: Changed “log” to “record/log” for clarity.
 - Split Medical and Mental Health Records into two separate line items and added language to clarify the policy requirements.
 - Assessments
 - Unaccompanied Child Case Review: In first bullet point, clarified that it’s the *initial* case review that is continuously updated until 30 calendar days after admission. In second bullet point, changed “Every 30 calendar days...” to “Subsequently every 30 calendar days...” for clarity.
 - Sponsor Assessment: Updated form expiration dates referenced. Changed “Within 5 days” to “Must be initiated within 5 days” for clarity.
 - Individual Service Plan: Changed “Within 5 days” to “Initial must be done within 5 days” for clarity.
 - Case Management – Recreation/Leisure: Changed “log” to “plan/log” for clarity. Removed “Effective 3/20/20 – avoid community outing due to COVID-19” since this is no longer applicable.
 - Clinical Services – Added “Disclosure Notice” to reflect new policy requirement.
 - Discharge
 - Removed “CDC Covid-19 Fact Sheet and Symptoms Sheet (Effective: 3/13/20)” – the revised sponsor letter has replaced that fact sheet.
 - Added “Post-18 Plan (if applicable)” to align with policy and procedures.
 - Family Reunification Packet: Updated form expiration dates referenced.
 - Post-Discharge – Health Follow-Up Call: Updated effective dates for related guidance and added language clarify requirements.
- **Unlicensed Facility Staff Secure Addendum to Case File Checklist (Form M-8D-UF)** – Made minor edits for more precise language and changed formatting to bullet point lists for several items.
- **Unlicensed Facility Personnel File Checklist (Form M-10A-UF)**
 - Removed Training Directive per ORR Management section because it is no longer a requirement. This requirement was related to a specific webinar series on the topic of trauma-informed care. It was removed because it is duplicative of the requirements in the cooperative agreement that require training on strength-based behavior management and trauma-informed care approaches.

- Annual Trainings – Removed “Hover for additional comments” and corresponding comment that read “How does the employee confirm comprehension of a training? i.e. quiz/test score or signature confirming comprehension” because respondents reported the comments were unhelpful.
- Trainings Every Two Years per Cooperative Agreement –
 - Medication Management: Added "must also receive medication administration training"
 - Removed “Hover for additional comments” and corresponding comment that read “How does the employee confirm comprehension of a training? i.e. quiz/test score or signature confirming comprehension” because respondents reported the comments were unhelpful.
 - Rephrased “Strength-based behavior management...” to “Strength-based behavior management and trauma-informed care approaches” to reflect current cooperative agreement requirements.

ORR reinstated the following forms as the number of respondents increased to more than nine respondents.

- **Unlicensed Facility Foster Care² Monitoring Notes (Form M-6C-UF)** – No modifications made.
- **Unlicensed Facility Foster Care Unaccompanied Child Case File Checklist (Form M-8B-UF)** – No modifications made.
- **Unlicensed Facility Staff Secure Addendum to Case File Checklist (Form (M-8D-UF)** – No modifications made.
- **Unlicensed Facility Foster Home Onsite Monitoring Checklist (Form M-9B-UF)** – No modifications made.

Quarterly Influx Care Facility Site Visits

ORR added the below-listed alternate version of a form that was previously approved by OMB but was removed from the information collection due to the number of respondents. Differences between the previously approved version and the alternate version are noted below.

- **Influx Care Facility Monitoring Notes (Form M-6E)**
 - Instructs monitors to review the facility’s contract and statement of work (as opposed to the grant application and cooperative agreement) to reflect the funding method used for ICFs
 - Removes the following sections that are specific to grants.
 - Fiscal year budget
 - Key positions approved by the Project Officer
 - Instructs monitors to review Significant Incident Reports (SIRs) from the past three months (as opposed to six months for shelters). This revision does not represent a

² The UC Program Monitoring Team uses foster care tools for both foster homes and long-term group homes. ORR does not operate unlicensed long-term foster care programs.

reduction in SIR review, rather it reflects the ongoing SIR review process that occurs for ICFs. Monitors are performing site visits within the first three months of an ICR opening, which means that there would only be three months' worth of SIRs available during the initial site visit. Thereafter, three months will cover review of all SIRs since the last site visit. For example, if an ICF opened at the start of January, the initial site visit would occur by the end of March and SIRs generated from January through March would be reviewed. The next site visit would then occur at the end of June and during that visit SIRs generated April through June would be review. There would be no need to review six months' worth of SIRs at that time because the SIRs generated January through March would have already been reviewed. This pattern of quarterly reviews would continue while the ICF is operational.

- Reworded questions under the staffing plan section to be more specific to contracts.
- Added instruction for monitors to ensure that the facility is following their supervision plan (as reported in the ICF Site Visit Guide) for any staff whose relevant background checks are still pending. All staff must pass a public records criminal background check before hire. Staff with direct access to children must also pass an FBI fingerprint check and child abuse and neglect check (CA/N). However, staff may be hired provisionally before FBI or CA/N check results are received if at all times prior to receipt of results the staff member is within the sight and under the supervision of a staff member whose background checks are complete.
- Removed questions on state licensing because ICFs are not eligible for state licensure.
- Removed section on mosquito control inspections. These inspections were originally established to address concerns with the Zika virus and are no longer performed.

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. 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.

- **Influx Care Facility Monitoring Site Visit Guide (Form M-7G)** – Revisions were made to develop a more in-depth guide to reflect the size and complexity of influx sites. ORR plans to pilot this revised guide at ICFs and later decide on whether some or all of these revisions should be made to site visit guides for other levels of care. ORR will seek OMB approval for any future revision to other versions of the site visit guide.
 - Reorganized and grouped questions under different sections, as well as rewording questions and instructions for clarity.
 - Added text boxes and tables to make clear where the ICF should enter information.
 - Added areas for the ICF to provide a brief overview of their site operations and list of subcontractors and their respective scopes of work.
 - Expanded the list of facility points of contact requested.
 - Added areas for the ICF to share any innovative and/or best practices implemented at the site and for the ICF to describe know deficiencies and/or areas for improvement.

- Added a table in the stakeholders section to prompt the ICF to provide more detail information about the frequency and type of collaboration as well as areas in need of improvement.
- Expanded section on personnel to include questions about personnel evaluation practices, whistleblower policies, and significant staffing changes, vacancies, deficiencies, and/or barriers to personnel capacity.
- In addition to providing copies of internal procedures, ICFs are asked to document information about the personnel responsible for internal reviews, protocols for responding to noncompliance, and how the ICF protects child privacy and confidentiality.
- Expands the question asking for the program's video monitoring policies and procedures to include all perimeter and internal security mechanisms.
- In addition to providing copies of emergency and evacuation plans, programs are asked to describe related procedures and provide information on emergency drills and after-action reviews.
- Added area for programs to describe their safety inspection practices and related drills, as well as an area to note concerns/deficiencies related to safety and security.
- Added questions on the program's procedures for staffing cases, case status updates, and how case managers coordinate with other disciplines (e.g., clinical).
- Split the question asking for the programs discharge procedures into several questions that prompt the program to specifically provide information about their procedures for transfers, age redetermination cases, and managing age outs.
- Added question that requests the program's procedures on facilitating sibling and family visits among children in care.
- Added question asking the program to note any complex or especially vulnerable cases that required specialized service coordination.
- Added question asking the program to note any concerns/deficiencies related to case management.
- Added new section on child supervision that asks for program's procedures on supervision plans and direct care staffing ratios, determining room/bed assignments, accurately monitoring the location of the child, and behavior management.
- Expanded the section that asks for a description of ancillary services to include recreational/leisure, religious, languages access, and phone call, visitation, and mail services (in addition to education and transportation).
- In addition to requesting copies of nutritional services procedures, adds a section for programs to describe these services. This includes food storage and safety protocols, how child dietary needs are met, how cultural and religious preferences are met, and any concerns/deficiencies.
- Expands the medical services section to add questions asking the program to describe their medical intakes procedures, onsite medical services, medication administration protocols, medical records system, the process for referring a child for offsite medical services, and vaccination procurement and administration protocols.
- Expands the mental health services section to add questions asking the program to describe their mental health intake procedures and onsite mental health services.

- In addition to requesting copies of prevention of sexual abuse procedures and related materials, asks the program to describe several specific aspects of their procedures.
- Breaks the general question asking the program to describe their SIR procedures into several more specific questions on who the responsible parties are for submitting reports, follow-up/addendums, and notification/coordination with external entities.
- Adds a new question asking the program how long it took to complete the form.
- Updates the type of background check documentation requested to align with background check requirements specific to influx care facilities.
- **Influx Care Facility Personnel File Checklist (Form M-10E)**
 - Pre-Service Trainings – Removed “State licensed required trainings” because ICF are not state-licensed.
 - Removed Training Directive per ORR Management section because it is no longer a requirement. This requirement was related to a specific webinar series on the topic of trauma-informed care. It was removed because it is duplicative of a new item added to the annual trainings section that monitors for training on strength-based behavior management and trauma-informed care approaches.
 - Annual Trainings – Added “Strengths-based behavior management approaches and trauma-informed care approaches, such as using conflict resolution, problem solving skills, using rewards and consequences, de-escalation techniques and helping children and youth learn accountability and self-control.”
 - Removed Trainings Every Two Years per Cooperative Agreement section because ICFs are funded through contracts and not grants.

Prevention of Sexual Abuse (PSA) Audits

ORR added to following new instruments:

- **Preaudit Questionnaire and Audit Documentation Requested Checklist (Form M-17A)**
- **Instructions for Site Visit and Facility Tour (Form M-17B)**
- **Interview Guide: Random Sample of Staff Interview (Form M-17C)**
- **Interview Guide: Program Director (Form M-17D)**
- **Interview Guide: Prevention of Sexual Abuse (PSA) Compliance Manager (Form M-17E)**
- **Interview Guide: Specialized Staff (Form M-17F)**
- **Interview Guide: Unaccompanied Child (Form M-17G)**
- **PSA Audit Corrective Action Report (Form M-17H)**

Revisions to Existing Forms

ORR made below noted revisions were made to existing forms in this collection to better align with ORR policies and procedures and strengthen monitoring protocols.

- **FFS Compliance and Safety Site Visit Report (Form M-3A)**
 - Converted the original Excel version into a web-based format.

- Removed the following items that are best practices but not explicitly required in ORR policy/procedures:
 - Client’s rights are posted in language unaccompanied child understands
 - Daily schedule is posted in language unaccompanied child understands
- Added the following fields
 - ORR Region
 - Please note the number of children in the group being interviewed
 - Please note the estimate age range of the group of children you interviewed
- Renamed field "FFS Name" to “ORR Representative Name”
- Consolidated separate questions regarding compliance with staffing ratios into two questions (“Is the program compliant with all ORR staffing ratios?” and “Are there staffing concerns?”) and added field “If Yes, please confirm you elevated this to the Project Officer for resolution or to address UC capacity.”
- **PSA Unaccompanied Child Incident Review (Form M-5A)** – Corrected typo in the *When did the incident occur?* field dropdown options, changing “pm” to “am.”
- **PSA Adult Incident Review (Form M-5B)** – Corrected typo in the *When did the incident occur?* field dropdown options, changing “pm” to “am.”
- **Site Visit Guide (Form M-7A)**
 - Under Child Protection – Added requirement for program to provide link to mandatory reporting laws/rules and specify who is classified as a mandatory reporter 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. These inspections were originally established to address concerns with the Zika virus and are no longer performed.
 - Added *Personnel and Volunteer List* as a supplemental tool to use with this instrument. This list directly corresponds to the information requested in the Background Checks section of the guide.
- **Foster Care Site Visit Guide (Form M-7C)**
 - Retitled form “Foster Care Site Visit Guide.” The former title was “Long Term Foster Care Site Visit Guide.”
 - Under Program Management – Added requirement to describe internal policies and procedures related to referral and placement.
 - Under Child Protection – Rephrased question 3 from “Describe the State's licensing child maltreatment reporting requirements. (Provide state link to licensing requirements for reporting requirements.)” to “Describe the State's child maltreatment reporting requirements. (Provide a link to the state’s mandatory reporting laws/rules. Also, include who classifies as a mandatory reporter in your state.)”
 - Under Facility, Foster Homes, and Food Services
 - Retitled “Facility, Foster Homes, and Food Services section to “Foster Homes.”
 - Moved the two questions unrelated to foster homes into their own section titled “Facility and Food Services” and added additional instructions to clarify what programs are expected to include in their description of the facility space.

- Under Case Management – Clarified what programs must provide related to their procedures on post-18 planning.
- Under Background Checks – Reordered and rephrased some of the questions.
- Under Health Services – Added examples of communicable diseases.
- Under Problems Encountered – Removed requirement to provide list of commonly used partnerships and services. This is duplicative of information already requested under the Program Management section.
- In the list of requested materials
 - Added educational curriculum and weekly class schedule
 - Reformatted the item requesting various policies and procedures into a bullet point list
- Added a note clarifying that ORR will request foster parent documentation for foster homes that are visited during the site visit.
- **Personnel File Checklist (Form M-10A)**
 - Removed Training Directive per ORR Management section because it is no longer a requirement. This requirement was related to a specific webinar series on the topic of trauma-informed care. It was removed because it is duplicative of the requirements in the cooperative agreement that require training on strength-based behavior management and trauma-informed care approaches.
 - Annual Trainings – Removed “Hover for additional comments” and corresponding comment that read “How does the employee confirm comprehension of a training? i.e. quiz/test score or signature confirming comprehension” because respondents reported the comments were unhelpful.
 - Trainings Every Two Years per Cooperative Agreement –
 - Medication Management: Added "must also receive medication administration training"
 - Removed “Hover for additional comments” and corresponding comment that read “How does the employee confirm comprehension of a training? i.e. quiz/test score or signature confirming comprehension” because respondents reported the comments were unhelpful.
 - Rephrased “Strength-based behavior management...” to “Strength-based behavior management and trauma-informed care approaches” to reflect current cooperative agreement requirements.
- **Foster Parent Checklist (Form M-10D)**
 - Under General Documentation – Added requirement for monitors to check for completed foster home study assessments/inspections.
 - General Documentation
 - Foster Home License: Added "(Effective: 2022; please reference the program-specific Cooperative Agreement)" to clarify requirements in the current cooperative agreement.
 - Added new item "Completed Foster Home Study Assessments/Inspections (Effective: 2022; please reference the program-specific Cooperative Agreement)" to align with requirements in the current cooperative agreement.

- Added new item “Foster Parent Agreement (signed; Effective: 2022; please reference the program-specific Cooperative Agreement)” to align with requirements in the current cooperative agreement.
 - Pre-Service Trainings – ORR Standards to Prevent, Detect, and Respond to SA and SH involving unaccompanied children: Removed “New employees must complete training before hire.” to align with current guidance that allows hire (but no interaction with children) before training.
- **Foster Parent Questionnaire (Form M-11O)**
 - Added instructions on the first page.
 - Reordered some questions.
 - Clarified that when asking the foster parent what information they received on the child, that ORR is asking about information on the child’s individual services needs and provided examples (education, health, dietary, religious, etc.).
 - Added example of independent living to question asking what types of activities the child participates in.
- **Unaccompanied Child Questionnaire – Ages 6-12 Years Old (Form M-12As)** – Updated Spanish translation to match currently-approved English version.
- **Unaccompanied Child Questionnaire – Ages 13 and Older (Form M-12Bs)** – Updated Spanish translation to match currently-approved English version.

ORR is requesting that the following instruments be removed from this information collection:

- **Remote Monitoring Site Visit Guide (Form M-7B)** – Remove from information collection. This instrument was created for use during the height of the COVID-19 pandemic. Monitors have resumed in-person site visits and the instrument is no longer needed.
- **Long Term Foster Care Remote Site Visit Guide (Form M-7D)** – Remove from information collection. This instrument was created for use during the height of the COVID-19 pandemic. Monitors have resumed in-person site visits and the instrument is no longer needed.
- **Voluntary Agency Site Visit Guide (Form M-7F)** – Remove from information collection. This instrument is completed by less than 10 respondents and therefore not subject to PRA.

REVISIONS APPROVED UNDER EMERGENCY APPROVAL

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

Quarterly Unlicensed Facility Site Visits

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.

- **Unlicensed Facility Monitoring Notes (Form M-6A-UF)**
 - Directions added to top of form.
- **Unlicensed Facility Unaccompanied Child 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 Unaccompanied Child Services tab.
- **Unlicensed Facility Onsite 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 Unaccompanied Child 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.

- **Unlicensed Facility 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.
- **Unlicensed Facility 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.
- **Unlicensed Facility 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.
- **Unlicensed Facility 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.
- **Unlicensed Facility Case Manager Questionnaire (Form M-11E-UF)**

- Removed question asking case manager to describe their relationship with their supervisor.
- **Unlicensed Facility Education Staff Questionnaire (Form M-11G-UF)** – No modifications made.
- **Unlicensed Facility Medical Coordinator Questionnaire (Form M-11I-UF)**
 - Removed question asking medical coordinator to describe their relationship with their supervisor.
- **Unlicensed Facility 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.
- **Unlicensed Facility Prevention of Sexual Abuse Compliance Manager Staff Questionnaire (Form M-11K-UF)** – No modifications made.
- **Unlicensed Facility Interpreter Questionnaire (Form M-11P-UF)** – No modifications made.
- **Unlicensed Facility Unaccompanied Child 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.
- **Unlicensed Facility Unaccompanied Child 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.
- **Unlicensed Facility Unaccompanied Child Questionnaire – Ages 5 and Under (Form M-12E-UF and M-12Es-UF)** – No modifications made.
- **Unlicensed Facility 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.
- **Unlicensed Facility Case Coordinator Questionnaire (Form M-13E-UF)** – No modifications made.

16. Plans for Tabulation and Publication and Project Time Schedule

ORR plans to publish aggregate data from its PSA audits as required in 45 CFR § 411.113(f).

Analysis Plans. The contractor auditors will aggregate all facility interim and final compliance within each standard, subpart, and overall. No complex analytical techniques will be used to summarize results. The analysis will use basic descriptive analysis to understand average compliance, commonly missed standards, and commonly met standards. Simple qualitative review for why standards were out of compliance will be used to explain why facilities did not meet the standard. Aggregated compliance data can help ORR and their technical assistance partners identify areas where facilities may need additional support or guidance.

Timeline. The contractor auditors began audits in January 2022 and will continue through October 2026. The contractor auditors will monitor aggregate audit data through the year to support continuous quality improvement (CQI) and contract monitoring which can include quarterly briefings to ORR. Annually, the contractor auditors will produce a summative report of the aggregate facility compliance data for all facilities that have completed the interim report and those facilities who have a complete final report. Each annual report will include all previous data with possible disaggregation by data collection time frames. The reporting schedule is included in the table below.

Estimated Timeline																				
Activity	Base Year 2021-2022				Option Year 1 2022-2023				Option Year 2 2023-2024				Option Year 3 2024-2025				Option Year 4 2025-2026			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Data Collection																				
Interim and CQI Reporting																				
Annual Reporting and Briefing																				
Annual Report Dissemination																				

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.