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Office of Management and Budget (OMB)

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Subject: Non-Substantive Change Request – Services Provided to Unaccompanied Children (OMB #0970-0553)

This memo requests approval of a non-substantive change to the approved information collection, Services Provided to Unaccompanied Children (OMB #0970-0553).

BACKGROUND

The Services Provided to Unaccompanied Children information collection contains 22 instruments that allow ORR to collect information necessary to provide services to unaccompanied children as required by the Homeland Security Act (6 U.S.C. 279), the Trafficking Victims Protection Reauthorization Act of 2008 (8 U.S.C. 1232), and the *Flores* Settlement Agreement (No. CV85-4544-RJK (C.D. Cal. 1996)). The collection was last approved by OMB on April 21, 2022 and expires on April 30, 2025.

ORR has undertaken several anti-fraud and anti-trafficking initiatives over the past year to strengthen its sponsor vetting process and increase measures taken to ensure children are released into safe home environments. One measure identified to support these efforts is to require sponsors to report changes of address for children to ORR and document the changes of address in the ORR case management system (UC Portal). This includes documenting when a released child's address/location is unknown because they have been reported missing.

Ensuring that ORR has accurate addresses for children in UC Portal will provide the following benefits:

- **Centralize address data for children in one location.** This will provide an efficient way to document changes of address and make it is easier to determine the location of the child for ORR staff, grantees, and contractors who need to know that information.
- **Ensure continuity of post-release service (PRS) provision.** PRS providers need up-to-date contact information for the child, including their current address, to ensure there is no interruption in the provision of these important support services.
- **Increase ORR's visibility on cases where a child moves out of the sponsor household.** Sometimes a placement breakdown may occur, leading the child to move in with the alternate caregiver identified by the sponsor in their application or with other family members. ORR lacks data to perform trend analyses on these situations that would help

identify areas where ORR can improve service provision for children and their sponsors that may help prevent placement breakdowns.

- **Strengthen ORR’s ability to identify potential trafficking concerns.** Currently, ORR enters the sponsor applicant’s current address into the Sponsor Assessment (Form S-5, approved under OMB# 0970-0553) and uses accumulated sponsor address data to identify situations where multiple children have been released to the same address or general area (e.g., same apartment complex), or where different sponsors are using the same address. These situations need to be scrutinized closely to ensure that there are no potential trafficking concerns. However, ORR’s ability to identify such potential concerns is limited due to lack of available change of address data when a released child moves, either with their sponsor or out of their sponsor’s household.

ORR determined that it would also be beneficial to include the location of the child while they are still in care, including when the child has been reported missing. This would allow ORR to have the address/location of the child, both while they are in care and after release, documented in one centralized location.

OVERVIEW OF REQUESTED CHANGES

Per 5 C.F.R. §1320.3(h)(1), changes of address are not considered “information” as long as “they entail no burden other than that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument.” Most of the fields that ORR is proposing fall under this exclusion. The two fields that do not fall under the exclusion are “Location Type” and “Notes.” Since the address information is aligned with the purpose of this information collection and falls under the referenced exclusion, ORR believes that the proposed revisions are nonsubstantive in nature.

Specifically, ORR proposes adding a section to the UC Portal case management system titled “Current Location of Child.” This section will document the current location of the child while the child is in ORR care, changes of address after the child is release from ORR custody, and when the child is reported missing. Adding this new section is a natural extension of the UC Case Status (approved under this information collection), which provides high-level information about the child and their case such as which program they are in, who their sponsor is, dates of key assessments, their primary case manager, and more.

ORR proposes housing this new section in the Discharge Tab which will allow for an intuitive user experience. The section will employ auto-population and progressive disclosure to the greatest extent possible to create a user-friendly experience for respondents and minimize burden. Please see **Attachment A** for an annotated mockup of the new section.

In addition, a “Location History” section will be located directly below the Current Location of Child section. The system will display a list of past locations of the child in this section. No data entry will be required for the Location History section.

Initially, users will only see one field in the Current Location of Child – a dropdown field named “Location Type.” Users will select an option from the dropdown menu and based on their selec-

tion additional information may auto-populate or additional fields may populate for the user to complete (see table below).

“Location Type” Dropdown Options

Dropdown Option	Notes
Program	The care provider program’s address will auto-populate.
Reported Missing Post-Release	No additional fields will populate.
Post-Release Address Update	Additional fields that employ progressive disclosure will populate for the user to complete.

Additional Fields for Post-Release Address Updates

If the child still resides with the sponsor, users will be prompted to update the sponsor’s address in the existing Sponsor Assessment (Form S-5, approved under OMB# 0970-0553). If the child moved to live with another individual (e.g., alternate caregiver, other family member) or on their own, users will be prompted to enter the child’s new address directly within the UC Case Status page.