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Office of Information and Regulatory Affairs (OIRA)

 Office of Management and Budget (OMB)

**From:** Shannon Herboldsheimer

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 Administration for Children and Families (ACF)

**Date:** April 24, 2023

**Subject:** Non-Substantive Change Request – Family Reunification Packet for Sponsors of Unaccompanied Children (OMB #0970-0278)

This memo requests approval of a non-substantive change to the approved information collection, Family Reunification Packet (FRP) for Sponsors of Unaccompanied Children (OMB #0970-0278).

**Background**

The FRP for Sponsors of Unaccompanied Children information collection contains four instruments that allow ORR to collect information necessary to determine the suitability of a proposed sponsor for 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 August 24, 2022, and expires on August 31, 2025.

**Overview of Requested Changes**

***Purpose of Requested Changes***

ORR is seeking to improve the sponsor application process by making two of its PDF forms, *Authorization for Release of Information* (Form FRP-2) and *Family Reunification Application* (Form FRP-3), available in a digital web-based application called the Sponsor Experience App. Currently, sponsors complete the forms electronically or by hand and share the completed forms and supporting documentation with their case manager using non-integrated solutions, such as email and WhatsApp. The new Sponsor Experience App will improve upon that process by providing:

* An easy and secure process for sponsors to submit their application and supporting documentation
* A guided form submission process
* A process that is user-friendly for both desktop and mobile platforms
* The capability for sponsors to easily collaborate with their case manager and get support
* A place where sponsors can view the status of their application

The currently approved PDF versions of these forms and existing communication processes will continue to be available for sponsors who have limited access to technology or otherwise choose to use the PDF versions of the forms.

***Conversion to Web-based Format and Functionality***

Rather than presenting forms FRP-2 and FRP-3 as two separate forms, the Sponsor Experience App will present the forms as one unified application consisting of six main sections (Sections 1-6). ORR also made other minor adjustments to the forms to take advantage of the improved functionality provided by a web-based format. Note that these changes do not alter the underlying OMB-approved information collection and the Sponsor Experience App collects the same information that is currently collected in forms FRP-2 and FRP-3.

**Section 1: Authorization** – Covers pages 1-2 of Form FRP-2.

* For ease of reading and to better support functionality on a mobile platform, the declaratory statements from pages 1-2 are separated into five pages. Sponsors are guided through these ten pages to read and agree to.
* In the PDF version, the sponsor is required to print their name, as well as sign and date the form to indicate their agreement. In efforts to reduce the burden of back-and-forth hard copy ink submittals and create an intuitive user experience, the name, signature, and date fields will be replaced with an agreement checkbox and typed electronic signature field in the app. This will allow for the sponsor to digitally agree to what they read and quickly declare that the information they provide is true.
* The footnote on page 3 has been updated to reflect the governing appropriation’s restriction.

**Section 2: Background** – Covers pages 2-4 of Form FRP-2, current address question from page 4 of Form FRP-3, and proof of identity documentation from page 8 of Form FRP-3.

* The tables in the PDF version are replaced with functionality that streamlines the ability to add, edit, and/or delete the following information:
	+ Children being sponsored
	+ Sponsor's previously used name(s)
	+ Sponsor's previous addresses covering 5 years
* Includes field validations that reduce error (e.g., date pickers for date of birth)
* Proof of identity documentation upload is integrated into this related, relevant workflow to alleviate fragmented processes of Case Managers having to manage the receipt of these files. This also includes categorization of the uploaded IDs for the system to organize the documentation received, reducing Case Managers' administrative tasks.
* Breaks out the Sponsor's addresses into two subsections - "Current address" and "Where have you lived the past 5 years?" which will allow the system to perform field validation on the current address (which must be a U.S. address), as well as inform the Case Manager where the sponsor currently resides and plans for the child to reside (a question in Form FRP-3). Additionally, the past addresses will have field validation to ensure the sponsor has entered at least 5 years of historic addresses and clearly delineate the country of the past address(es).

**Section 3: Sponsor Information** – Covers all of page 3, the financial information question on page 6, proof of child’s identity from page 8, legal records from page 9, and proof of relationship from pages 9-10 of Form FRP-3.

* The application will auto-populate the name of each child entered in Section 2 and ask the sponsor to clarify their relationship to each child.
* Proof of relationship documentation upload is integrated into this related, relevant section to streamline the workflow and avoid potentially missed documentation requirements. This also includes categorization of the uploaded documents for the system to organize the documentation received, reducing Case Managers' administrative tasks.
* Proof of child's identity is directly uploaded into the system to streamline the back-and-forth of documentation exchange.
* To avoid duplicative entry, the fields for sponsor name, sponsor’s previously used name(s), and sponsor date of birth found on page 3 of Form FRP-3 were not included because they are already captured in Section 2.

**Section 4: Household Information** – Covers all of page 4, health information questions from page 6, criminal history questions from page 7, and legal records and proof of address from page 9 of Form FRP-3.

* The sponsor is asked whether the address where they plan to live with the child is the same as their current address. If they select “yes” then the address they entered in Section 2 is auto-populated, otherwise the sponsor will enter the address and why it is different than their current address.
* Proof of address documentation upload is integrated into this related, relevant section to streamline the workflow and avoid potentially missed documentation requirements. This also includes categorization of the uploaded documents for the system to organize the documentation received, reducing Case Managers' administrative tasks.
* The table for household member information in the PDF version is replaced with functionality that streamlines the ability to add, edit, and/or delete the required information. In addition, sponsors are able to more clearly specify the household members' relationships to each child in cases where the sponsor is applying to sponsor multiple children.
* The Health Information and Criminal History subsections embrace progressive disclosure so that fields asking for additional information do not populate on the form unless a sponsor selects “yes” to any of these questions.
* There will not be a place to upload documents in the Criminal History section in the first iteration of the app. Sponsors will continue to submit these documents (when applicable) to their case manager via existing methods of communication for now.

**Section 5: Alternative Caregiver** – Covers page 5 of Form FRP-3.

* Sponsors are able to more clearly specify the alternate caregiver’s relationships to each child in cases where the sponsor is applying to sponsor multiple children.

**Section 6: Application Signature** – Covers the signature requirement on page 7 of Form FRP-3.

* Similar to the signature requirement in Section 1, in efforts to reduce the burden of back-and-forth hard copy submittals and create an intuitive user experience, the application signature checkbox and typed electronic signature field allow for the sponsor to digitally agree to what they read and quickly declare that the information they provide is true.

**Frequently Asked Questions** – Covers page 2 of Form FRP-3.

***Timeframe for Requested Changes***

ORR requests a response by mid-May to allow time to pilot the app.