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Office of Management and Budget (OMB)

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**Date:** July 25, 2023

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

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

The Services Provided to Unaccompanied Children information collection contains 22 instruments that allow ORR to collect information necessary to provide services to Unaccompanied Children (UC) 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 is proposing revisions to one instrument in this collection, the Sponsor Assessment (Form S-5).

## **BACKGROUND**

The Flags section within the Sponsor Assessment (Form S-5) allows ORR to collect information necessary for the safe release of a child. It enables respondents to indicate potential concerns with sponsors, their household members, their identified alternate caregiver, and/or their address that will require further investigation before a child can safely be released to the sponsor. In instances where a sponsor later applies to sponsor another child, it also allows respondents to easily view concerns identified and how they were addressed in previous sponsorship.

Respondents are required to enter the specifics of any scenario that has led to a flag in the open textboxes that currently exist in the Flags section. This includes the date the flag was entered, a clear and concise description of the concern (i.e., flag type and details), what the risk to the child is, and what steps were taken to mitigate the risk, as well as the name of the household member or alternate caregiver when applicable.

## **OVERVIEW OF REQUESTED CHANGES**

Currently, there are only two textboxes (one for sponsor flags and one for address flags) in which respondents can enter flag information. ORR proposes replacing these textboxes with discrete fields for Flag Type, Name, Flag Category, Flag Description, and Comments, as well as system-

generated information on who created each flag and the date created. **Please refer to Appendices A and B for additional details.**

## **REASON FOR CHANGE**

Having only two textboxes in which respondents can enter flag information has resulted in the following issues:

### *Burdensome on Respondents*

- It is difficult for respondents to visually distinguish between 1) different sponsor/address flags and 2) information provided in the initial flag and follow-up information. Therefore, reviewing information can be time consuming.
- Respondents cannot easily see how many flags have been entered for each person/address and what those flags were for; they must read through all the data in the text box to discern this information.
- It is important that historical flag information not be overwritten. To prevent respondents from erroneously overwriting flag information, the flag textboxes lock after initial data entry and respondents must contact the UC Portal helpdesk to have them temporarily reopened to enter additional flags/information. This method is flawed and overly cumbersome. It may also cause respondents to wait to enter flags until later instead of entering them in real time to avoid the need to contact the helpdesk.
- Respondents must write out a description of the type of flag and that description may end up being lengthy and time consuming to write.

### *Data Quality Issues*

- It is difficult for ORR to visually distinguish between 1) different sponsor/address flags and 2) information provided in the initial flag and follow-up information.
- It is difficult to identify reoccurring safety concerns and ensure appropriate mitigation strategies are enacted because currently ORR is unable to perform trend analysis.
- There is no way to clearly specify that a flag is for a household member or alternative caregiver. This information is entered into the textbox for sponsor flags, which means that any concerning behavior on the part of the household member or alternate caregiver is attached to the sponsor, sometimes unfairly.
- There is little consistency in how information is entered into the flag textboxes.
  - There is no common terminology for describing the type of flag.
  - Respondents are inconsistent when following ORR guidance to enter the date of the flag before the description.
- Some respondents will visually separate flags using spaces between entries and others do not.

## **IMPROVEMENTS RELATED TO BURDEN ON RESPONDENTS**

- The addition of specific flag types and improved visual organization of flag information means that respondents and ORR federal staff will spend less time sifting through flag in-

formation and are able to investigate and make decisions about the viability of sponsors more quickly.

- Respondents will no longer need to contact the UC Portal helpdesk when additional flags/information needs to be entered. The initial flag entry will automatically be locked when saved to ensure data integrity and respondents will enter follow-up information in a separate textbox that will not be locked.
- Respondents will no longer need to manually enter the date the flag was created; the system will generate the date automatically.
- The Flag Type field will make clear to respondents what types of concerns merit a flag and reduce the need for respondents to reference separate guidance documents.

## OTHER BENEFITS

- Standardizing the data collection will allow ORR to identify trends, ensure respondents have enacted appropriate mitigation, and provide tailored support to programs that need it.
- The system will auto-generate the name of respondent who entered the flag. This is important so that individuals reviewing flag information know who to contact with follow-up questions and for ORR monitoring purposes.

## METHODS USED TO DETERMINE NECESSARY CHANGES

- **Interviews:** Conversations were held with federal staff and less than 10 respondents to help ORR understand the current flagging process and the limitations of it from the perspective of the respondent and federal staff.
- **Clickable Prototype:** Used to help facilitate conversations with respondents about what the revised section would look like to ensure we got the flow and interactions correct.
- **Usability Testing:** Conducted for less than 10 respondents. Allowed ORR to take the proposed redesign back out to respondents to ensure that it met their needs and was easy to use.
  - o The actual design of the section was usability tested with:
    - 2 case managers
    - 1 national call center representative
    - 1 home study/post-release services staff member
  - o The flag type and category dropdown options were reviewed with:
    - 3 case managers
    - 2 post-release services provider staff members