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Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

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Subject: Non-Substantive Change Request – Monitoring and Compliance for Office of Refugee Resettlement (ORR) Care Provider Facilities (OMB #0970-0564)

This memo requests approval of a non-substantive change to the approved information collection, Monitoring and Compliance for Office of Refugee Resettlement (ORR) Care Provider Facilities (OMB #0970-0564).

BACKGROUND

The Monitoring and Compliance for ORR Care Provider Facilities information collection consists of several forms that allow the Unaccompanied Children (UC) Program to monitor its care provider facilities for compliance with Federal and State laws and regulations, licensing and accreditation standards, ORR policies and procedures, and child welfare standards. The collection was last approved by OMB on November 3, 2023 and expires on November 30, 2026.

ORR is proposing revisions to one form in this collection, the FFS Compliance and Safety Site Visit Report (Form M-3A). This form is completed by ORR Federal Field Specialists (FFS) to document site visit observations and interview responses. Currently, the form is completed in Microsoft Forms. ORR proposes moving the form onto a different digital platform that will enhance the functionality of the form and improve user experience.

OVERVIEW OF REQUESTED CHANGES

To facilitate moving the form onto the new platform and provide a more user-friendly experience, ORR proposes the following revisions:

- Rename the form “FFS Site Visit Form”
- Display each section as a tab at the top of the form to make navigating between sections easier
- Pull information from an existing scheduling system to auto-populate the following fields:
 - Site visit number and program name displayed at the top of the form
 - In the Visit Information section:
 - ORR Region
 - Program Name

- Level of Care
 - ORR Representative Name
- Remove the field that asks the user to fill in their name because it is duplicative
- Rephrase field labels for clarity and add references to applicable UC Policy Guide sections (see Attachment 1)
- Add comment fields that must be completed if the answer to the following questions is “no” (all questions that ask for a yes/no response were intended to have an associated comment field, but the comment fields are missing for these two question):
 - Are Garza Notices and Infographics posted?
 - Is the program in compliance with all staffing ratio requirements?
- Enhance functionality of the child interview section:
 - Allow users to document interview responses for each interview separately. Currently, if more than one interview is conducted, responses for all interviews are lumped together in the same field for each question.
 - Add a checkbox to note when no children are interviewed during the site visit and a textbox to document the reason.
 - Remove the field that asks for the number of children in the interview because this information is not needed.
- Add new Flags section that FFS may use to denote positive and negative observations and/or items that need follow up.¹
- Add an Additional Notes section to document any additional details about the site visit.²

¹ This section is completed based solely on the observations of federal staff (FFS). Under 5 C.F.R. 1320.3(h)(3), facts or opinions obtained through direct observations by an employee of the sponsoring agency is generally excluded from the definition of “information.”

² *id.*