

**To:** Kelsi Feltz  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Emily Gallagher  
Office of Refugee Resettlement (ORR)  
Administration for Children and Families (ACF)

**Date:** June 28, 2024

**Subject:** Non-Substantive Change Request – Administration and Oversight of the Unaccompanied Children Program (OMB #0970-0547)

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This memo requests approval of non-substantive changes to the approved information collection, Administration and Oversight of the Unaccompanied Children Bureau (OMB #0970-0547).

## **BACKGROUND**

The Administration and Oversight of the Unaccompanied Children Bureau information collection contains 12 instruments that allow the Office of Refugee Resettlement (ORR) to facilitate stakeholder visits to care provider facilities; obtain consent from unaccompanied children to share their case file information; improve service delivery to unaccompanied children; ensure that serious issues are elevated to ORR and that all incidents and the response to such incidents are documented and resolved in a way that protects the interests of unaccompanied children; and process requests and waivers for the hiring of key and non-key personnel at care provider programs. The collection was last approved by OMB on May 18, 2022, and the current expiration date is May 31, 2025.

ORR is proposing revisions to one form in this collection, the *Key Personnel Qualifications Checklist and Attestation* (Form A-14). This instrument is used by ORR care provider programs to request hiring approval for key positions, as required in the ORR cooperative agreement, and, if applicable, request a waiver of minimum qualifications when appropriately justified.

## **OVERVIEW OF REQUESTED CHANGES**

ORR proposes the following revisions to Form A-14:

- Correct OMB Control Number listed on the form from 0970-0558 (Generic Monitoring) to 0970-0547 (Administration and Oversight) to conform with the recent re-organization of UC Program information collections;
- Replace citation to 45 C.F.R. § 411.101(d) with the correct citation to 45 C.F.R. § 411.81(d);
- Correct grammatical typos where they appear in the document;
- Add a Project Officer electronic signature and date field to Section E: ORR Confirmation, and Section H: ORR Waiver Approval; and
- Reorganize Section E: ORR Confirmation and Section H: ORR Waiver Approval such that the Project Officer (PO) Decision appears before the signature block.

Once approved, these changes will make the A-14 Key Personnel Minimum Qualifications Checklist and Attestation Form more accurate and secure; citing to the appropriate statute ensures that Project Officers apply the correct criteria to their evaluation of candidates for key personnel positions at care provider facilities. Further, adding electronic signature fields to Sections E and H replaces the static text “signature” field currently in use; this enhances the document security by requiring an authenticated e-signature, which is more difficult to forge or alter. The proposed changes will promote accuracy, accountability, compliance with applicable statutes, and responsible candidate screening practices in our care provider network.