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Office of Management and Budget (OMB)

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

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

BACKGROUND

The “Administration and Oversight of the Unaccompanied Children Program” 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 children; and 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 best 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 to revise form *Notification of Concern* (NOC) (Form A-7) to correspond with revisions made to UC Policy Guide Section 4.3.5 and ensure consistency across forms used for documenting serious incidents concerning unaccompanied children while in ORR custody and post-release. The NOC is completed by care providers, post-release service providers, or by ORR National Call Center staff to document the occurrence of a concerning incident impacting a released child and/or their sponsor.

OVERVIEW OF REQUESTED CHANGES

Currently proposed changes provide clarified instruction to the respondent, reorganize the structure of the information collection, and offer more specific sub-category options for respondents to select when completing the form. The updates do not change the purpose or use of the data collection and do not include requests for new types of information. Additionally, there are no resulting changes to burden estimates.

Specifically, the following changes have been made to Form A-7 to align the form with the UC Policy Guide and Non-Emergency SIR language, clarify instructions to the respondent, and more accurately reflect the perspective of respondents completing the form:

General/Structural Changes:

- Added a dropdown menu underneath the title of the *Notification of Concern* to indicate if the form is an original or an addendum to a previously created NOC.
- Moved “Reporting Party” section to the first page to make all important contact information visible on the first page.
- Renamed “Caregiver Information (if different)” section to “Primary Caregiver Information”
- Replaced “UC” when referring to an unaccompanied child wherever it appears on the form to conform with ORR style guide best practices concerning the use of child-centric language.
- Corrected technical errors related to style and grammar wherever they appear in the document.

Released Child Information Section:

- Added clarification to A# field (do not include dashes)
- Added “Care Provider” to the “Program Name” field to specify the respondent should enter the name of the care provider program that served the released child prior to discharge.

Reporting Party Section:

- Renamed “Type” field to “Reporting Organization Type” to clarify that the reporter should select the type of the organization they represent from the existent dropdown menu: Care Provider, ORRNCC, or PRS Provider.
- Added “Reporter E-mail” field to capture the email address of the respondent if individualized follow-up with the respondent is necessary.
- Added “Reporter Phone” field to capture the phone number of the respondent if individualized follow-up with the respondent is necessary.

Event Details Section:

- Rephrased one option in the existent “Location of Event” dropdown menu to clarify its intent. The option was updated from “U.S. Interior (not DHS or ORR)” to now read as “U.S. Interior (not in DHS or ORR custody)”

Sponsor Information Section:

- Clarified “Sponsor Flag” field by rephrasing as “Reporter Entered/ Will Enter Sponsor Flag” to document if the respondent has taken or will take this action; the Project Officer will verify.
- Created “Reporter Entered/ Will Enter Sponsor Address Flag ” field to document if the respondent has taken or will take this action. The Project Officer will verify.
- Created dropdown menu for “Reporter Entered/ Will Enter Sponsor Address Flag?” field with the following options: “Yes”, or “No”

Primary Caregiver Information Section:

- Clarified instructions and included a request to the respondent to provide as much

information as possible, leaving fields blank if the information is unknown.

Incident Information Section:

- Revised Notification of Concern Category: “Staff Code of Conduct” to match UC Policy Guide Section 4.3.5 and the terminology currently used in the Non-Emergency SIR form (currently approved under this information collection), clarifying that staff may not cohabitate, engage in outside contact, romantic relationships, or the exchange of any pictures, gifts, letters, or social media with a released child before that child turns 21 years old. These changes re-order the category and provide clarification to the terminology without adding new criteria.
- Added clarifying language to the Notification of Concern Category: “Child Behavioral Incident with Safety Concerns” to specify that this refers to behavior that poses a risk to self or others in the home community, and refers only to the child’s actions, not actions of others towards the child.
- Added the sub-category option of “NOC Reporter initiated concurrent CPS reporting” to the “CPS Involvement” category to clarify action taken by the NOC respondent as CPS case acceptance or investigation may not always be known at the time of reporting to ORR;
- Added instructions “Notify ORR Immediately” to the Notification of Concern Category “Death of Released Child.”
- Relocated the previous Notification of Concern Categories of “Actual or Potential Fraud” and “Intentional Information/Document Fraud” to subcategories under one overarching category titled “Fraud”
- Rephrased “Actual or potential Fraud” to “Actual or Potential Fraud Scheme Targeting Sponsor or Child” subcategory for greater clarity.
- Clarified Notification of Concern Category “Serious Medical Issue or Hospitalization” by rephrasing to read “Serious Medical and/or Mental Healthcare Issue or Unplanned Hospitalization” to specifically include mental health-related serious medical issues, while also eliminating the filing of unnecessary NOCs in response to planned hospital procedures.
- Added two subcategories to the Notification of Concern Category “Serious Medical and/or Mental Healthcare issue or Unplanned Hospitalization”: “Pregnancy with Complications” and “Emergency (Alert: Notify ORR Immediately)”. Uncomplicated pregnancies are not, in and of themselves significantly concerning, thus do not require documentation in a NOC.
- Created an overarching Notification of Concern Category: “Other Sponsor-Related Concerns” and moved the following underneath as subcategories:
 - Current item with minor revisions: “Lost Contact with Sponsor and/or Released Child and have Safety Concerns”, with the instruction to the respondent that loss of contact alone is not a safety concern.
 - New subcategory: Unable to Establish Contact with the Sponsor or Released child within 30 days of release or Referral Acceptance” The current version of Form A-7 provides an option to indicate that contact has been “lost” with the sponsor or child, but PRS providers begin working with the case only after the child has been released. In some cases, PRS providers may be unable to establish initial contact

with the sponsor or child post-release, thus we have added this category to accurately capture when loss of contact indicates a safety concern.

- Removed the following category “Sponsor Declined Services”; Post-Release Services (PRS) captures this datapoint in the PRS Report (OMB #0970-0553), which tracks PRS engagements; where there are no safety concerns, it is unnecessary and duplicative to document a sponsor declining PRS using the Notification of Concern.
- Removed the “Notify Prevention of Sexual Abuse Team?” field as care provider, PRS, and ORRNCC respondents are not responsible for notifying the ORR Prevention of Child Abuse and Neglect (PCAN) team when issues of abuse, neglect, sexual abuse, sexual harassment, or inappropriate sexual behavior are being reported; the Project Officer is responsible for initiating the report to PCAN upon review of the submitted NOC form.
- Clarified instructions to respondents entering information in the “Persons/Agencies Contacted” table to “Please add a row for each unique contact.”
- Relabeled the first column of the “Persons/Agencies Contacted” table to read “Agency or Person (Title)”
- Added a “Phone Number” column to the “Persons/Agencies Contacted” table to capture the person or agency phone number.