**To:** Kelsi Feltz

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

**From:** Shannon Herboldsheimer

Office of Refugee Resettlement (ORR)

Administration for Children and Families (ACF)

**Date:** September 16, 2024

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

This memo requests approval of a non-substantive change 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 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 unaccompanied 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. The collection was last approved by OMB on May 18, 2022 and the current expiration date is May 31, 2025.

ORR is proposing changes to one form in this collection, the *Notification of Concern* (Form A-7). Form A-7 is currently formatted as a fillable PDF. ORR plans to digitize and incorporate the form into its new interactive, web-based application for Post-Release Services (PRS). As part of this process, ORR solicited feedback and completed testing activities, as approved under the “Feedback for Post-Release Service (PRS) Solution Development and Iteration” information collection (0970-0401), and has identified minor revisions to improve clarity, usability, and functionality of the digital form.

### OVERVIEW OF REQUESTED CHANGES

*PROPOSED REVISIONS:*

The proposed revisions for Form A-7 will allow ORR to collect the same information through an interactive, web-based application for PRS that features auto-populated information, easy and intuitive navigation, visual distinction of different sections, instructional text, field labels, auto save, alert messages, and an approval workflow that mirrors and streamlines the workflow that currently occurs over multiple systems internal and external to ORR.

Digitizing Form A-7primarily changes the format and the mode of completion and submission. Some nonsubstantive revisions are proposed that add follow-up questions, system-generated fields, and auto-populated fields to support form functionality in a web-based environment and improve the utility of the form.

**Appendix A provides details about how information will be rearranged or changed.**

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#### *HOW THIS IMPROVES USER EXPERIENCE:*

Currently, PRS case managers complete multiple drafts of the PDF version of Form A-7 within their provider systems, emailing edits back and forth with their supervisor, and involving their supervisor and additional parties to review, approve, and finally submit the form to ORR through email and upload it to UC Portal (ORR’s case management system). To provide updates about the same incident to ORR, PRS case managers must add information to a copy of the previously submitted version of Form A-7 and go through the process of emailing drafts to their supervisor and others again before submitting the addendum to ORR.

The current process hinders PRS case managers in being able to provide timely incident reports to ORR and consequently hinders ORR from ensuring timely assessment and resolution of those incidents. In addition, it difficult for ORR to analyze data held in PDF forms to identify trends, improve service delivery, and enact mitigation strategies.

The digitization of the form and proposed revisions will help users complete and submit incident documentation to ORR with greater speed, efficiency, confidence, and ease. The PRS application will also help improve responsiveness and accuracy and create efficiencies in the following ways:

* The PRS application design adheres to the U.S. Web Design System, which ensures greater usability through features built for easy and intuitive form completion, such as improved navigation and autosave.
* Auto-populated information fields will cut down on time PRS Case Managers take to complete the form, while also increasing accuracy of the information collection.
* PRS case managers and their supervisors will be able to complete, review, approve, and submit the form all within the same application, cutting down on a) information loss due to document versions and transfers between systems and b) time lost due to processes required to navigate the multiple systems, versions, and transfers.
* The ability to provide updates on the same incident through an addendum feature will cut down the time PRS Case Managers currently take to provide updates.
* ORR staff will be able to review, assess, and adjudicate incidents in a timelier manner and with greater accuracy, due to the information being completed, submitted, and updated instantaneously within the same application.
* The data collected will be standardized across PRS digital forms and fields, making the data more valuable for identifying patterns and tailoring support to ORR programs that need it.
* Updates to field labels, instructional text, and alert messages will make the forms more understandable and easier to fill out, being based on both user research and subject matter expert (SME) input.
* These collective changes will lessen the cognitive load for all users involved, so they can focus on effectively managing and responding to incidents based on accurate and timely documentation.