

Legal and Advocacy Services for Unaccompanied Children

**OMB Information Collection Request
0970 – 0565**

Supporting Statement Part A - Justification

October 2024

Type of Request: Revision

Submitted By:
Office of Refugee Resettlement
Administration for Children and Families
U.S. Department of Health and Human Services

Summary

This request is to remove five forms from this collection, add two new forms, move two forms from different information collections into this collection (with revisions to one of those forms), and revise three existing forms in this collection. The title of this collection has also been updated from “Legal Services for Unaccompanied Children” to “Legal and Advocacy Services for Unaccompanied Children.”. Details about requested revisions are described in section A15.

1. Circumstances Making the Collection of Information Necessary

The Office of Refugee Resettlement (ORR) Unaccompanied Children (UC) Bureau provides care and custody for unaccompanied children until they can be safely released to a sponsor, repatriated to their home country, or obtain legal status. ORR funds residential care provider facilities that provide temporary housing and other services to children in ORR custody. Generally, care provider facilities are State-licensed (with the exception of those located in states unwilling to consider them for licensure and temporary influx care facilities) and must meet ORR requirements to ensure a high-level quality of care. Services provided at care provider facilities include, but are not limited to, education, recreation, vocational training, acculturation, nutrition, medical, mental health, legal, and case management.

ORR uses several instruments directly related to the care of unaccompanied children. The instruments in this information collection allow ORR to provide legal and advocacy services to unaccompanied children, as required by the legal authorities that govern the bureau.

Legal Authorities

Homeland Security Act (HSA), 6 U.S.C. 279 – Transferred responsibilities for the care and placement of unaccompanied children from the Commissioner of the former Immigration and Naturalization Service (INS) to the Director of ORR. The HSA also requires that unaccompanied children have access to legal representation.

William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA), 8 U.S.C. 1232 – Creates additional requirements for the placement, services, and discharge of unaccompanied children in federal custody and directs ORR to create policies to ensure unaccompanied children are protected from traffickers and others seeking to victimize them or otherwise engage them in criminal, harmful, or exploitative activity. The TVPRA also authorizes ORR to appointment independent child advocates and requires that ORR coordinate with the Executive Office for Immigration Review to ensure sponsor receive legal orientation presentations and ensure children have access to legal representation.

Unaccompanied Children Program Foundational Rule, 45 C.F.R. 410 – Establishes a uniform set of standards and procedures concerning the placement, care, and services provided to unaccompanied children in ORR care that is consistent with ORR’s statutory duties and implements minimum standards for the care of unaccompanied children.

2. Purpose and Use of the Information Collection

The purpose of the forms included in this information collection is to gather information that will allow ORR to provide legal and advocacy services to unaccompanied children, as required by the legal authorities that govern the bureau. Information specific to each form follows.

- **Acknowledgement of Receipt of Legal Resource Guide (Form LRG-4) (formerly LRG-5 Legal Service Provider List for UC in ORR Care):** This instrument is completed by care provider staff and signed by the child and a witness to acknowledge that the child received certain legal resource materials upon admission and upon discharge from ORR custody. This form is available in English and Spanish.
- **Request for Specific Consent to Juvenile Court Jurisdiction (Form L-1):** This instrument is used by legal service providers and attorneys of record to request specific consent from ORR in cases where they are seeking Special Immigrant Juvenile legal relief for their unaccompanied child client and are also seeking to invoke the jurisdiction of a state court to determine or alter the child's custody status or placement. See [45 CFR § 410.1209](#) and [UC Policy Guide Section 2.8.5 Requesting Specific Consent from ORR Regarding Custody Proceedings](#) for related agency guidance.
- **Specific Consent Request Case Summary (Form L-2):** This instrument is completed by ORR Federal Field Specialists (FFS) when ORR receives a request for specific consent. FFS provide case information that will allow the ORR Director to make an informed decision on whether to grant specific consent. See [45 CFR § 410.1209](#) and [UC Policy Guide Section 2.8.5 Requesting Specific Consent from ORR Regarding Custody Proceedings](#) for related agency guidance.
- **Notice of Attorney Representation (Form L-3A):** This instrument is completed by attorneys of record for unaccompanied children to notify ORR of the purpose of legal representation and the representation timeframe. ORR uses this instrument to ensure that case updates are provided to attorneys of record. This instrument may also be used by attorneys of record when requesting a copy of their client's case file. See [45 CFR § 410.1309\(c\)\(2\)](#) and [UC Policy Guide Section 3.7.2 Direct Legal Representation](#) for related agency guidance.
- **Notice of Legal Service Provider Screening (Form L-3B):** This instrument is used as supporting documentation by ORR-funded legal service providers performing legal services screenings and Know Your Rights (KYR) presentations to unaccompanied children when requesting their client's case file records. See [45 CFR § 410.1309\(a\)\(2\)](#) and [UC Policy Guide Section 3.7.1 Know Your Rights Presentation & Confidential Legal Consultation for Legal Relief](#) for related agency guidance.
- **UC Legal Information (Form L-4):** This instrument is used by case managers to document, as applicable, referrals to the Office on Trafficking in Persons; meetings between the child and their legal service provider or attorney of record; the provision of ORR's Legal Resource Guide to the child; information about the child's legal service provider or attorney of record; immigration and administrative hearings; and provision of the *Notice of Placement in a Restrictive Setting* to the child. The instrument also includes an area to upload legal documents.
- **Legal Service Provider Record (Form L-6):** This instrument is used by case managers to create a record containing certain information and documents that ORR makes accessible to ORR-funded legal service providers without requiring a formal records request.
- **[NEW] Case Status Summary for Executive Office for Immigration Review (Form L-9):** This form is completed by the Federal Field Specialist or care provider and sent to the Executive Office for Immigration Review (EOIR) in advance of a child's immigration hearing. The form provides basic information needed to ensure that EOIR has accurate information on the child's case status. A copy of the form is also shared with the child's legal service provider or attorney of record and child advocate (if applicable).
- **[NEW] Recommended States List (Form L-11):** This form is completed by legal service providers for children transferring to a long-term foster care (LTFC) placement. The form provides a list of preferred placement locations recommended by the LSP based on the child's

potential for immigration relief in each state, type of immigration relief, and status of court hearings or relief petitions. The LSP's recommendation is one of several factors ORR considers when making an LTFC placement determination. See [UC Policy Guide Sections 1.2.6 Long-Term Foster Care](#) and [1.4.4 Transfer to Long-Term Foster Care](#) for related policies.

- **[TRANSFERRED] Child Advocate Referral (Form L-12A):** This instrument is used by care providers and other stakeholders to recommend appointment of a child advocate for a child. The form is available in PDF format and as a web-based form. See [45 CFR § 410.1308](#) and [UC Policy Guide Section 2.3.4 Child Advocates](#) for related agency guidance.¹
- **[TRANSFERRED] Notice of Administrative Review (Form P-18):** This instrument serves as written notice of receipt of a Placement Review Panel request, provides the child with information on next steps to take when requesting a review and reconsideration of the child's placement in a restrictive setting, and requests information needed by ORR to conduct the placement review from the child or their representative. This instrument is available in English, Spanish, Dari, and Pashto. See [45 CFR § 410.1902](#) and [UC Policy Guide Section 1.4.7 Requesting Reconsideration of a Restrictive Placement](#) for related agency guidance.²

3. Use of Improved Information Technology and Burden Reduction

ORR is in the process of streamlining information management by consolidating unaccompanied children information from disparate storage locations, reducing manual paperwork processing conducted outside of the system (e.g., spreadsheets, PDFs, Word documents), maximizing the use of auto-population so that information is not entered more than once, enforcing business rules through automated workflow management, and improving business intelligence capabilities by automating reporting and data analytics.

4. Efforts to Identify Duplication and Use of Similar Information

The information being collected by these forms are not obtainable from other sources.

5. Impact on Small Businesses or Other Small Entities

The proposed information collections will not burden or impact small businesses.

6. Consequences of Collecting the Information Less Frequently

Not collecting the information requests on these forms would impede ORR from performing its charged duty of providing legal and advocacy services to unaccompanied children. Furthermore, all grantees and contractors funded to provide services to these children are required in writing to comply with all ORR regulations, policies, procedures, and other guidance, which includes collecting the information in these instruments.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

None of the characteristics outlined in 5 CFR 1320.5(d)(2) apply to the instruments in this collection.

¹ Form transferred from under OMB #0970-0553, with changes.

² Form transferred as-approved under OMB #0970-0554.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency’s intention to request an OMB review of this information collection activity. This notice was published on June 18, 2024 (89 FR 51528) and provided a sixty-day period for public comment. During the notice and comment period, responses were received from four commenters, each containing multiple comments. Attachment A provides a summary of those comments and ORR’s responses.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift will be provided to the respondents.

10. Assurance of Confidentiality Provided to Respondents

ORR established a system of records to ensure the level of confidentiality pursuant to the Privacy Act. 5 U.S.C. 552a. ORR’s system of records notice, titled 09-80-0321 ORR Division of Children’s Services Records, was published on July 18, 2016 at 81 FR 46682.

11. Justification for Sensitive Questions

Sensitive information may be collected in the *Specific Consent Request Case Summary* in order for ORR to make an informed decision on granting specific consent. ORR does not ask for any information of a sensitive nature beyond what is needed to make the decision.

12. Estimates of Annualized Burden Hours and Costs

The following factors were used to estimate burden hours and cost to respondents:

- The actual number of referrals to ORR custody, transfers within the ORR care provider network, and discharges from ORR custody from March 2023 to February 2024.
- ORR funds approximately 300 care provider grantees.
- The cost to respondents was calculated using mean hourly wage data from May 2023 (accessed September 2024) for the following Bureau of Labor Statistics (BLS) job codes. The rates were multiplied by two to account for fringe benefits and overhead.
 - 21-1021 Child, Family, and School Social Workers in the industry of Other Residential Care Facilities – $\$22.01 \times 2 = \44.02
 - 23-2011 Paralegals and Legal Assistants in the industry of Legal Services – $\$30.90 \times 2 = \61.80

| Instrument | Annual Number of Respondents | Number of Responses per Respondent | Average Burden Hours per Response | Annual Total Burden Hours | Average Hourly Wage | Annual Total Cost |
|------------|------------------------------|------------------------------------|-----------------------------------|---------------------------|---------------------|-------------------|
|------------|------------------------------|------------------------------------|-----------------------------------|---------------------------|---------------------|-------------------|

| | | | | | | |
|--|---------|---------|------|----------------|-------------------------|------------------------|
| Request for Specific Consent to Juvenile Court Jurisdiction (Form L-1) | 31 | 1.0 | 0.25 | 8 | \$61.80 | \$494.40 |
| Specific Consent Request Case Summary (Form L-2) | 300 | 0.1 | 0.33 | 10 | \$44.02 | \$440.20 |
| Notice of Attorney Representation (Form L-3A) | 5,000 | 1.0 | 0.25 | 1,250 | \$61.80 | \$77,250.00 |
| Notice of Legal Service Provider Screening (Form L-3B) | 5,000 | 1.0 | 0.17 | 850 | \$61.80 | \$52,530.00 |
| UC Legal Information (Form L-4) | 300 | 406.0 | 1.00 | 121,800 | \$44.02 | \$5,361,636.00 |
| Legal Service Provider Record (Form L-6) | 300 | 406.0 | 0.08 | 9,744 | \$44.02 | \$428,930.88 |
| Case Status Summary for Executive Office of Immigration Review (Form L-9) | 300 | 5.0 | 0.17 | 255 | \$44.02 | \$11,225.10 |
| Recommended States List (Form L-11) | 60 | 10.0 | 0.33 | 198 | \$61.80 | \$12,236.40 |
| Child Advocate Referral (Form L-12A) - Respondents | 300 | 19.0 | 0.25 | 1,425 | \$44.02 | \$62,728.50 |
| Child Advocate Referral (Form L-12A) - Recordkeepers | 1 | 5,601.0 | 0.33 | 1,848 | \$44.02 | \$81,348.96 |
| Acknowledgment of Receipt of Legal Resource Guide (LRG-4) - Unaccompanied Children | 121,669 | 2.0 | 0.25 | 60,835 | \$44.02 | \$2,677,956.70 |
| Acknowledgment of Receipt of Legal Resource Guide (LRG-4) - Care Providers | 300 | 817.0 | 0.25 | 61,275 | \$44.02 | \$2,697,325.50 |
| Notice of Administrative Review (Form P-18) | 200 | 1.0 | 0.83 | 166 | \$44.02 | \$7,307.32 |
| Estimated Annual Burden | | | | 259,664 | Estimated Annual | \$11,471,409.96 |

| | | | |
|---------------------|--|--------------------|--|
| Hours Total: | | Cost Total: | |
|---------------------|--|--------------------|--|

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Respondents will not incur any direct monetary costs, other than their time, in the completion of these instruments.

14. Annualized Cost to the Federal Government

The annualized cost estimate for each of these instruments considers the time of a step 1 GS-12 in the Washington, DC locality to review information following submittal. No additional costs will be incurred by the Federal government for developing computer systems or storing the instruments as those systems are already in place. The hourly rate was multiplied by two to account for fringe benefits and overhead.

| Form | Annual Number of Federal Staff | Number of Reviews per Federal Staff | Average Federal Staff Burden Hours per Review | Annual Total Federal Staff Burden Hours | Average Federal Staff Hourly Wage | Annual Total Federal Staff Cost |
|--|---------------------------------------|--|--|--|--|--|
| Request for Specific Consent to Juvenile Court Jurisdiction (Form L-1) | 1 | 31 | 1.00 | 31 | \$95.06 | \$2,946.86 |
| Specific Consent Request Case Summary (Form L-2) | 110 | 0.3 | 0.50 | 17 | \$95.06 | \$1,568.49 |
| Recommended States List (Form L-11) | 110 | 6 | 0.25 | 165 | \$95.06 | \$15,684.90 |
| Notice of Administrative Review (Form P-18) | 5 | 40 | 0.50 | 100 | \$95.06 | \$9,506.00 |
| Estimated Annual Burden Hours Total: | | | | 213 | Estimated Annual Cost Total: | \$20,200.25 |

15. Explanation for Program Changes or Adjustments

Proposed revisions for this information collection are detailed below. ORR also proposes retitling this information collection “Legal and Advocacy Services for Unaccompanied Children” to clarify the types of forms included in this information collection.

Note on Revisions to the “Gender” Field:

In accordance with the Executive Order on Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals ([EO 14075](#)) and [HHS' Sexual Orientation and Gender Identity \(SOGI\)](#)

[Data Action Plan](#), ORR is in the process of developing and implementing its own SOGI Data Action Plan to improve its collection of SOGI data and ensure SOGI data is collected in a consistent manner across all UC Bureau forms.

Currently, gender identity information is not collected in a consistent manner. Most forms include either a free text box or a dropdown field with options for male and female. ORR plans to standardize this field by making it a dropdown with options for male, female, and nonbinary across all UC Bureau forms. This decision was based on the [Federal Evidence Agenda on LGBTQI+ Equity](#) and input from HHS LGBTQI+ leadership and ORR leadership. UC Bureau forms will be revised on a rolling basis. This collection has been updated in accordance with this plan.

DISCONTINUED FORMS

ORR plans to remove the following forms from this information collection:

1. **Request for a Flores Bond Hearing (Form LRG-7), Motion to Request a Bond Hearing – Secure or Staff Secure Custody (Form LRG-8A), and Motion to Request a Bond Hearing – Non-Secure Custody (Form LRG-8B):** The bond hearing process was replaced with a Risk Determination Hearing process under the UC Program Foundational Rule, 45 CFR 410. These forms were replaced with a new set of form specific to the RDH process, approved under OMB# 0970-0633.
2. **Motion for Change of Venue (Form L-7):** This instrument was created for the UC Path case management system and was intended to be used for filing a motion for change of venue for children transferring to a different ORR care provider program. However, the UC Path system was never implemented, and this form has never been used. In addition, this function is performed by an entity that is party to the proceedings, typically the child’s legal representative or Immigration and Customs Enforcement, because the decision to file a change of venue may affect the child’s immigration case. A change of venue is filed for cases where a Notice to Appear has been filed. Since neither ORR nor its care provider programs perform this function, the form is not needed.
3. **Post Legal Status Plan (Form L-8):** The information collected in this form was incorporated into the Legal Services Plan section of the Category 4 Discharge Plan (Form R-9, currently approved under OMB #0970-0552). Therefore, ORR plans to discontinue this form.

NEW FORMS

ORR plans to add the following new forms to this information collection:

1. **Case Status Summary for Executive Office for Immigration Review (Form L-9):** This form is completed by the Federal Field Specialist or care provider and sent to the Executive Office for Immigration Review (EOIR) in advance of a child’s immigration hearing. The form provides basic information needed to ensure that EOIR has accurate information on the child’s case status. A copy of the form is also shared with the child’s legal service provider or attorney of record and child advocate (if applicable).
2. **Recommended States List (Form L-11):** This form is completed by legal service providers for children transferring to a long-term foster care (LTFC) placement. The form provides a list of preferred placement locations recommended by the LSP based on the child’s potential for immigration relief in each state, type of immigration relief, and status of court hearings or relief petitions. The LSP’s recommendation is one of several factors ORR considers when making an LTFC placement determination.

Note: This form contains five dropdown fields containing options for states in which ORR operates LTFC programs. The states in which ORR operates LTFC programs often fluctuate which will

require ORR to continually update the options available in the dropdown fields. To prevent any delay in the LSP's ability to provide recommendations to ORR, ORR is requesting approval to update the dropdown options without additional approval from OMB.

FORMS TRANSFERRED FROM A DIFFERENT INFORMATION COLLECTION

1. ORR plans to transfer the **Notice of Administrative Review (Form P-18)** into this information collection without revisions. This form is currently approved under OMB# 0970-0554.
2. ORR plans to transfer the **Child Advocate Recommendation and Appointment** form into this information collection. This form is currently approved under OMB# 0970-0553. The currently approved version has been revised to move Section B: Recommendation and Appointment and Section C: ORR Approval into a separate form to better facilitate the referral, recommendation, and appointment process. The separate form containing the information collected in Sections B and C will be completed by fewer than 10 respondents and is, therefore, not subject to PRA and is not included in this request.

Additionally, ORR proposes the following revisions to assist its child advocate contractor in supporting referred children and making recommendations. ORR worked directly with the contractor to improve the form and incorporated recommendations the contractor submitted via public comment.

- Rename the form *Child Advocate Referral* (Form L-12A)
- Replace "UC" with "child" throughout the forms
- Add fields for the Title, Email, and Phone Number of the referrer
- Make the following revisions related to the child's biographic information:
 - Split the field for the name of the child into three separate fields for First Name, Second or Middle Name, and Last Name(s)
 - Add fields for Also Known As (AKA) and Nicknames or Preferred Names
 - Change the Gender field from an open text field to a dropdown field with options for Male, Female, and Nonbinary.
 - Add a field for Other Language(s) Spoken
- Add the following fields related to the child's entry into the United States:
 - U.S. Port of Entry Where Child Entered
 - Date of Apprehension by DHS
- Make the following revisions related to the child's placement:
 - Reword the Care Provider field to Current Care Provider Facility
 - Reword the Admission Date field to Provider Admission Date
 - Add the following fields:
 - Is the child in ORR custody?
 - Was the child at another ORR care provider facility?
 - If yes, provide the care provider facility name(s)
 - Add a field for Date of Entry into ORR Custody
 - Child's Length of Care in ORR Custody
- Add the following fields related to the child's sponsor:

- o Does the child have a sponsor?
- o If yes, what category has ORR assigned to this sponsor?
- o How many potential sponsors has the child had?
- Add the following fields related to the child’s legal representation:
 - o Does the child have legal representation?
 - o If yes, provide the following information for the legal representative: Name, Phone, Email
- Revise the list of reasons for referral to better reflect the most common reasons child advocate referrals are made
- Add a text box where referrers can provide additional details regarding the reason for referral
- Revise the burden estimate to reflect the number of child advocate referrals made from April 2023 through March 2024. The annual number of respondents increased from 216 to 300 and the annual number of responses per respondent increased from 5 to 19.

REVISIONS TO EXISTING FORMS

ORR plans to make the following revisions to existing forms in this information collection:

1. **Request for Specific Consent to Juvenile Court Jurisdiction (Form L-1):**

- Replace “UC” with “child” throughout the form
- Update language in the form’s introductory text and Section D: Next Steps to align with the UC Program Foundational Rule.
- Reword the Name of Intended Guardian field to Name of Intended Individual or Entity to be Granted Custody to account for the fact that not all states use the word “guardian” to describe an individual or entity granted legal custody of a child. Revision is responsive to public comments.
- Revise the burden estimate to reflect the number of requests for specific consent received in FY2023. The annual number of respondents decreased from 40 to 31.

2. **Specific Consent Request Case Summary (Form L-2):**

- Remove instruction to complete an internal clearance form because that is no longer part of the process.
- Add text fields for the email addresses of the case manager and FFS to better facilitate communication when UC Bureau headquarter staff have follow-up questions.
- Replace “UC” with “child” throughout the form
- Change the Gender field from an open text field to a dropdown field with options for Male, Female, and Nonbinary.
- Remove question 3 (If the child was released from ORR custody into the new custody situation, would there be any risk of escape?) and the mention of “flight risk” in Section C to align with the UC Program Foundational Rule. Revision is responsive to public comments.
- Revise the burden estimate to reflect the number of case summaries completed in FY2023 and account for an increase in the number of care provider facilities. The annual number of respondents increased from 216 to 300 and the annual number of responses per respondent decreased from 0.2 to 0.1.

3. **Acknowledgement of Receipt of Legal Resource Guide (Form LRG-4):**

- Change form number from LRG-5 to LRG-4
- Retitle form *Acknowledgement of Receipt of Legal Resource Guide* (formerly titled *Legal Service Provider List for UC in ORR Care*)
- Remove the information provided on the first page and the list of legal service providers and their contact information. ORR plans to incorporate this information into a separate document and children will acknowledge receipt of that document in this form.
- Revise the list of documents provided to children to reflect forthcoming revisions and consolidation of legal resource guide documents.

Note: The documents included in the legal resource guide can fluctuate. To prevent any delays in having children acknowledge receipt of the current set of documents included in the legal resource guide, ORR is requesting the ability to amend the list of documents in the form as needed without further approval from OMB.

- Remove requirement for children to initial each list item to reduce burden for the child.
- Add instructions to put an “X” in the signature line in cases where the child is unable to sign the form and add a text field for the care provider to document the reason the child was unable to sign (e.g., child is two years old). This will assist ORR in monitoring compliance with requirements to complete this form.
- Add a field for care provider program name.
- Revise the burden estimate to account for an increase in the number of care provider facilities and in the number of children placed in ORR care and report the burden for care providers and unaccompanied children separately to improve accuracy of the estimate. The annual number of respondents increased from 216 to 300 for care providers and 121,669 unaccompanied child respondents were added. The annual number of responses per respondent increased from 556 to 817 for care providers and the responses per respondent for children is two (2).
- ORR plans to translate the form into Spanish and other languages commonly spoken by unaccompanied children and will submit a nonsubstantive change request once the translations are ready.

REVISIONS TO BURDEN ESTIMATES ONLY FOR EXISTING FORMS

ORR plans to make the following revisions to burden estimates for existing forms in this information collection without revisions the content of the forms:

1. **Notice of Attorney Representation (Form L-3) and Notice of Legal Service Provider Screening (Form L-3B):**

- Previously, the annual number of respondents was overestimated at 6,500 for each form. ORR is changing that estimate to 5,000 for each form (which will still be higher than the number of forms submitted in the previous year) based on the actual number of children who received direct representation through ORR’s legal service provider contractor and rounded up to account for an expected increase in direct representation and forms submitted by outside attorneys.

2. **UC Legal Information (Form L-4):**

- Revise the burden estimate to account for an increase in the number of care provider facilities and in the number of children placed in ORR care. The annual number of respondents

increased from 216 to 300 and the annual number of responses per respondent increased from 241 to 406.

3. Legal Service Provider Record (Form L-6):

- Revise the burden estimate to account for an increase in the number of care provider facilities and in the number of children placed in ORR care. The annual number of respondents increased from 216 to 300 and the annual number of responses per respondent increased from 241 to 406.

16. Plans for Tabulation and Publication and Project Time Schedule

ORR does not plan to publish the information provided by the respondents.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

ORR plans to display the expiration date of clearance as set by OMB.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.