

Services Provided to Unaccompanied Alien Children

**OMB Information Collection Request
0970 - 0553**

Supporting Statement Part A - Justification

April 2025

Type of Request: Revision

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

Summary

The Office of Refugee Resettlement (ORR) Unaccompanied Alien Children (UAC) Bureau has undertaken a reorganization of its information collections with the goal of promoting operational efficiency for the UACB by creating more unique information collections with fewer total forms under each Office of Management and Budget (OMB) number. This will reduce the burden associated with renewing large collections and clarify future requests for modifications and renewals under these narrower purpose-specific collections. This package pertains to the renewal of the Services Provided to Unaccompanied Alien Children information collection (OMB #0970-0553).

Under this application for renewal, ORR proposes revisions to five forms, the removal of six forms, and the transfer of ten forms to two new information collections titled *Unaccompanied Alien Children Bureau Assessments of Children and Sponsors* (OMB 0970 – NEW) and *Home Study and Post-Release Services Provided to Unaccompanied Alien Children* (OMB 0970 – NEW), which are detailed separately in concurrent substantive packages. Additionally, on October 24, 2024, ORR submitted a request for revisions to forms approved under the *Legal and Advocacy Services for Unaccompanied Alien Children collection* (OMB 0970-0565) in which ORR also proposed transferring the Child Advocate Recommendation and Appointment (Form S-15) previously approved under this collection; the request is currently pending a decision before OMB.

1. Circumstances Making the Collection of Information Necessary

The Office of Refugee Resettlement (ORR) Unaccompanied Alien Children (UAC) Bureau provides care and custody for unaccompanied alien children until they can be safely released to a vetted sponsor, repatriated to their home country, or obtain lawful immigration 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, except those located in states unwilling to consider them for licensure and temporary Emergency or Influx (EIF) facilities. In both cases, such facilities 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 alien children. The instruments in this information collection allow ORR to provide services to unaccompanied alien children as required by the Homeland Security Act (HSA) (6 U.S.C. 279), the Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA) (8 U.S.C. 1232), the recently published Unaccompanied Children Program Foundational Rule, (45 C.F.R. 410), as well as other ORR regulations (i.e., 45 C.F.R. parts 411 and 412), and the provisions of the Flores Settlement Agreement (No. CV85-4544-RJK (C.D. Cal. 1996)) that still apply to HHS.¹¹ The collection was last approved by OMB on April 21, 2022, and expires on April 30, 2025. The collection currently contains 22 instruments, including 33 alternative versions. Upon

¹ See *Flores v. Garland*, No. CV 85-4544-DMG (AGRX), 2024 WL 3467715 (C.D. Cal. June 28, 2024) (partially and conditionally terminating the FSA as to HHS, with certain exceptions, based on ORR's publication of the Foundational Rule).

completion of this revision request, which removes six forms and the transfers ten forms to two new information collections, this collection will contain 5 unique, revised instruments

Legal Authorities

Homeland Security Act (HSA), 6 U.S.C. 279 – Transfers responsibilities for the care and placement of unaccompanied alien children from the Commissioner of the former Immigration and Naturalization Service (INS) to the Director of ORR.

William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA), 8 U.S.C. 1232 – Creates, consistent with the HSA, additional requirements for the placement, care, and release of unaccompanied alien children in federal custody. The TVPRA also directs ORR to create policies to ensure unaccompanied alien children are protected from traffickers and others seeking to victimize them or otherwise engage them in criminal, harmful, or exploitative activity.

Unaccompanied Children Program Foundational Rule, 45 C.F.R. Part 410 – Establishes a uniform set of standards and procedures concerning the placement (Part 410.1100 – 1109), care (Part 410.1000 – 11004), and services (Part 410.1300 – 1311) provided to unaccompanied alien children in ORR care that is consistent with ORR’s statutory duties and implements the terms of *Flores* that create responsibilities for HHS and ORR.

ORR’s Interim Final Rule, Standards to Prevent, Detect, and Respond to Sexual Abuse and Sexual Harassment Involving Unaccompanied Children, 45 C.F.R. Part 411 – Sets forth such standards for ORR care provider facilities that house UAC in accordance with section 1101(c) of the Violence Against Women Reauthorization Act of 2013, Pub. L. 113-4 (VA WA 2013).

2. Purpose and Use of the Information Collection

The instruments included in this information collection directly relate to the care of UAC for processing pursuant to the Paperwork Reduction Act. These instruments allow ORR to provide services to unaccompanied alien children as required by statute, regulation, and ORR policy. ORR is transferring instruments that do not directly align with the narrow purpose of providing services to children in ORR care and custody two new, concurrently proposed collections: *Unaccompanied Alien Children Bureau Assessments of Children and Sponsors* and *Home Study and Post-Release Services Provided to Unaccompanied Alien Children*.

The instruments renewed under this collection are:

- **Long-Term Foster Care Travel Request (Form S-14):** This form is completed by long term foster care providers to request ORR approval for a child to travel with their foster family outside the local community, consistent with requirements of 45 CFR 410.1303(d). See UAC Policy Guide Section 3.6 – ORR Long Term Foster Care; Section 3.6.1 – ORR Long-Term Foster Care Service Provision; Section 5.6.2 – Maintaining Case Files for related policies. ORR will DISCONTINUE use of the UC Path version of this form while maintaining the UAC Portal version the UC Path case management platform developed by ORR has been terminated and was never implemented.

- **Admission (Form S-18):** This form is completed by ORR grantee case managers and clinicians to document the child’s initial needs, functioning, and history as required by 45 CFR 410.1302(c) (8). Other instruments are accessible from within the Admission instrument, such as transfer requests (45 CFR 410.1601), travel requests, and various child assessments (45 CFR 410.1302(c) (2); 45 CFR 411.41; 45 CFR 411.42). See UAC Policy Guide Section 3.2 – Care Provider Admissions and Orientation for Unaccompanied Alien Children; Section 3.2.1 – Admissions for Unaccompanied Alien Children; Section 5.6.2 – Maintaining Case Files for related policies.
- **UAC Authorized/ Restricted Call List and Call Log (Form S-20):** This form is completed by case managers to create a list of authorized and restricted contacts to ensure safe communication for the child and document details of phone calls made by a child in ORR care and custody, as required by 45 CFR 410.1302(c)(10). See UAC Policy Guide Section 3.3.10 – Calls, Visitation, and Email; Section 5.6.2 – Maintaining Case Files for related policies.
- **Case Manager Call Log and Case Notes (Form S-23):** This form is completed by case managers to log any contact (in-person, phone, video, social media, or mail) that they make in relation to the child’s case, including any related notes, as required by 45 CFR 410.1302(c)(10). See UAC Policy Guide Section 2.2.2 – Contacting Potential Sponsors; Section 2.3.2 – Case Managers; Section 2.8.3 – Closing the Case File; Section 2.8.4 – Safety and Well-Being Follow-Up Call; Section 5.6.2 – Maintaining Case Files for related policies.
- **UAC Case Status (Form S-27):** This instrument is used by care providers to monitor the status of high-level milestones in a child’s case as required by 45 CFR 410.1302(e), and is auto-populated in the UAC Portal with data collected by other instruments including the UAC Assessment (Form S-11), the Initial Medical Examination Form (45 CFR 410.1307(b)(2)), the Sponsor Assessment (Form S-5) (45 CFR 410.1202) and various Home Study and Post-Release related instruments. See UAC Policy Guide Section 5.10.2 – Limits to Sharing Information with DHS and EOIR; Section 5.10.3 – Information Sharing with LSPs, Attorneys of Record, and Child Advocates for policies specifically concerning the UAC Case Status record. For guidance concerning the data that populates the UAC Case Status, consult the UAC Policy Guide Section 2 for sponsorship and release recommendations, Section 3 for child assessments, Section 5 for case management administration requirements, and Section 6 for Home Study and Post Release Services.

3. Use of Improved Information Technology and Burden Reduction

ORR is in the process of streamlining information management by consolidating unaccompanied alien 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 statutorily mandated services to unaccompanied alien children. Furthermore, all grantees and contractors funded to provide services to these children are required by the terms of their Cooperative Agreements or contracts 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.

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 November 25th, 2024 (89 FR 92941) and provided a sixty-day period for public comment. During the notice and comment period, ORR received no (0) substantive responses from commenters, therefore no summary is included with this Supporting Statement Justification.

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 has established a system of records pertaining to the records of unaccompanied alien children. Pursuant to the Privacy Act, 5 U.S.C. 552a, it has also published a System of Records Notice. See Privacy Act, System of Records Notice, 89 Fed. Reg. 100500 (December 12th, 2024). Additionally, ORR has developed policy (UAC Policy Guide Section 5.10.2 – Limits to Sharing Information with DHS and EOIR) as directed under the Consolidated Appropriations Act, 2021 and House Report 116-450 which restricts the sharing of sensitive information, including medical and mental health records, confidential legal consultation assessments, and certain biographic information disclosed by a child with outside parties.

11. Justification for Sensitive Questions

Sensitive information is collected on the forms for ORR to provide appropriate services to unaccompanied alien children and to make an informed, timely, and safe release decisions. ORR does not ask for any information of a sensitive nature beyond what is needed to provide services and make the release decisions.

12. Estimates of Annualized Burden Hours and Costs

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

- The projected number of referrals to ORR custody, transfers within the ORR care provider network, and discharges from ORR custody from October 1st, 2024, to September 30th, 2025, estimated by the U.S. Department of Homeland Security (DHS), Office of Security Statistics (OSS) to be 65,000.
- ORR funds approximately 300 care provider grantees.
- The cost to respondents was calculated using the national mean hourly wage data from May 2024 (accessed April 7th 2025), for the Bureau of Labor Statistics (BLS) job code 21-1021 Child, Family, and School Social Workers in the industry of Individual and Family Services. The rates were multiplied by two to account for fringe benefits and overhead – $\$26.45 \times 2 = \52.90 and total costs were rounded to the nearest whole dollar.

ORR evaluated each form to determine which parties were responsible for completion and projected an estimated time response time for each instrument based on the number and type of questions asked. Significant changes to existing forms prompted a re-evaluation to increase or decrease the estimated time burden on respondents.

Form	Annual Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Annual Total Burden Hours	Average Hourly Wage	Total Annual Cost
Foster Care Travel Request (Form S-14)	138	108	0.25	3,726	\$52.90	\$197,105.00
Admission (Form S-18)	300	217	0.33	21,483	\$52.90	\$1,136,451.00
UAC Authorized/ Restricted Call List and Call Log (Form S-20)	300	217	0.08	5,208	\$52.90	\$275,503.00
Case Manager Call Log and Case Notes (Form S-23)	300	217	0.08	5,208	\$52.90	\$275,503.00
UAC Case Status (Form S-27)	300	217	0.25	16,275	\$52.90	\$860,948.00
Estimated Annual Burden and Cost Hours Total:				51,900		\$2,745,510.00

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

There are no other costs to respondents and record keepers.

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 captured in these forms 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 and total costs were rounded to the nearest whole dollar.

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
Foster Care Travel Request (Form S-14)	110	135	0.13	1,856	\$95.06	\$176,455.00
Admission (Form S-18)	110	592	0.17	10,745	\$95.06	\$1,021,401.00
UAC Authorized/ Restricted Call List and Call Log (Form S-20)	110	592	0.04	2,605	\$95.06	\$247,612.00
Case Manager Call Log and Case Notes (Form S-23)	110	592	0.04	2,605	\$95.06	\$247,612.00
UAC Case Status (Form S-27)	110	592	0.13	8,140	\$95.06	\$773,788.00
Estimated Annual Burden Hours Total:				25,951	Estimated Annual Cost Total:	\$2,466,868.00

15. Explanation for Program Changes or Adjustments

DISCONTINUED FORMS

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

1. **Long Term Foster Care Travel Request (Form S-14) – UC Path Version only):** The UC Path case management system has been discontinued and was never implemented. The desired features from the UC Path version of the S-14 form have been integrated into the currently proposed

renewal of the S-14 UAC Portal version. It is unnecessary to maintain approval for the UC path version of the S-14 and discontinuing its use under the Services Provided to Unaccompanied Alien Children information collection will support improved operational efficiency under the PRA portfolio reorganization effort.

2. **Home Study/ Post-Release Service (HS/PRS) Primary Provider Entity (Form S-21A):** The UC Path case management system has been discontinued and was never implemented. The HS/PRS Primary Provider Entity profile has not been adopted in the UAC Portal case management system and all relevant features from this instrument have already been implemented in UAC Portal, therefore maintaining approval of the S-21A is unnecessary and ORR is discontinuing its use.
3. **Home Study/ Post-Release Service (HS/PRS) Subcontractor Entity (Form S-21B):** The UC Path case management system has been discontinued and was never implemented. The HS/PRS Subcontractor Entity profile has not been adopted in the UAC Portal case management system, therefore maintaining approval of the S-21B is unnecessary and ORR is discontinuing its use.
4. **Home Study/ Post-Release Service (HS/PRS) Subcontractor Entity (Form S-21C):** The UC Path case management system has been discontinued and was never implemented. The HS/PRS Primary Provider Profile has not been adopted in the UAC Portal case management system, therefore maintaining approval of the S-21C is unnecessary and ORR is discontinuing its use.
5. **Home Study/ Post-Release Service (HS/PRS) Subcontractor Entity (Form S-21D):** The UC Path case management system has been discontinued and was never implemented. The HS/PRS Subcontractor Entity profile has not been adopted in the UAC Portal case management system, therefore maintaining approval of the S-21D is unnecessary and ORR is discontinuing its use.
6. **Sponsor Application (Form S-24):** This form was created for the UAC Path case management system and was intended to be used by care providers to document certain information and milestones in the sponsor application process. However, the UAC Path system was never implemented, and this form has never been used. ORR can document most of the information that was to be collected in this form in the Sponsor Assessment (Form S-5) and UAC Case Status (Form S-27), both of which are currently approved under this information collection. Therefore, maintaining approval of this form is not needed and ORR is discontinuing its use.

NEW FORMS

ORR is not introducing any newly created forms to this information collection currently.

FORMS TRANSFERRED FROM A DIFFERENT INFORMATION COLLECTION

ORR is not transferring any existing forms approved under other information collections to this information collection at this time.

FORMS TRANSFERRED TO A DIFFERENT INFORMATION COLLECTION

1. ORR plans to transfer the following forms currently approved under this information collection (OMB# 0970-0553) to the newly proposed *Unaccompanied Alien Children Bureau Assessments for Children and Sponsors* (OMB# 0970-NEW) with revisions:

- **Sponsor Assessment (Form S-5)**
 - **Initial Intakes Assessment (Form S-8)**
 - **Assessment for Risk (Form S-9)**
 - **UAC Assessment (Form S-11)**
 - **UAC Case Review (Form S-12)**
 - **Individual Service Plan (Form S-13)**
 - **Adult Contact Profile (formerly titled New Sponsor) (Form S-7)**
2. ORR plans to transfer the following forms currently approved under this information collection (OMB#0970-0553) to the newly proposed *Home Study and Post-Release Services Provided to Unaccompanied Alien Children* (OMB# 0970-NEW) with revisions:
- **Home Study/Post-Release Service (HS/PRS) Referral (Form S-19)**
 - **Post-Release Service (PRS) Event (Form S-22)**
 - **Home Study Assessment (formerly titled Home Study Report) (Form S-6)**
 - **Home Study Referral (Form S-26)**
3. On October 24, 2024, ORR submitted a request for revisions to forms approved under the Legal and Advocacy Services information collection (OMB 0970-0565) which also proposed transferring the following form with revisions; this request is currently pending OMB approval.
- **Child Advocate Recommendation and Appointment (Form S-15)**

REVISIONS TO EXISTING FORMS

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

GLOBAL CHANGES

1. Revise terminology:
 - Replace “Unaccompanied Child” and “UC” with “Unaccompanied Alien Child” and “UAC” wherever they appear to revert to previous program standards and conform with terminology used in the Homeland Security Act (HSA), 6 U.S.C.
 - Replace “Gender” with “Sex” and provide only “male” and “female” menu options where applicable in conformance with Executive Order (E.O.) 14168 (*Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*)

FORM-SPECIFIC CHANGES

1. **Long Term Foster Care Travel Request (Form S-14):**
 - Remove “Long-term” from the form’s title to clarify this form may be used for children in all foster care settings.
 - Add “physical location of the child” filed to the UAC Basic Information section, consistent with changes made to the UAC Case Status (S-27) form; this field will auto-populate data from the “UAC Portal Discharge Tab.

- Clarify that the name of the individual with whom the child is traveling must be an adult.
- Remove Personal Vehicle information section from the form to align UAC travel request data collection with domestic child welfare practices;
- Add Health Safety Travel Plan section to the form to document how the child’s health conditions, if applicable, may be effectively managed while traveling with their foster family, and plan for how the foster family will handle any health-related emergencies which may occur during travel.
- Simplify the Travel Request Approval section by removing the following fields:
 - Reason Travel Request is being submitted to ORR/ DCS for approval:
 - Is the travel request in accordance with state guidelines?
 - Purpose of travel and trip summary:
 - Are there any identified safety concerns in this child’s background?
 - Is there any indication of flight risk
- Add a summary approval field with an open text comment space for approving officials to document their rationale for approval or denial.
- Adjust the burden estimate to account for an increase in the number of care provider facilities completing the form (form now used for children in all foster care settings, not just long-term foster care), a decrease in the number of children placed in ORR care, and to reflect a decrease in the overall number of fields the respondent will need to complete. The annual number of respondents increased from 30 to 138, the annual number of responses per response increased from 8 to 108, and the average burden hours per response decreased from 0.33 hours to 0.25 hours.

2. Admission (Form S-18):

- Add “physical location of the child” filed to the UAC Basic Information section, consistent with changes made to the UAC Case Status (Form S-27) form; this field will auto-populate data from the UAC Portal Discharge Tab.
- Adjust the burden estimate to account for an increase in the number of care provider facilities and number of children placed in ORR care. The annual number of respondents increased from 216 to 300 and the annual number of responses per response decreased from 278 to 217.

4. UAC Authorized/ Restricted Call List and Call Log (Form S-20):

- Add “Call Supervision Required?” field to the Authorized Contacts List; content will auto-populate on the call logs display tab and reference the corresponding field in the Family/ Friend contact profile. When entering this data, respondents will select from a “Yes/No” dropdown menu to indicate if contact between the child and named individual must be supervised by care provider staff.
- Add the following fields to the UAC Call Log to support data tracking related to UAC Bureau Policy Guide Section 3.3.10 Calls, Visitation, Mail and Email:
 - “Call Duration” with an open text field for the care provider staff to document the length of the call
 - “Supervision Required?” which will auto-populate “Yes” or “No” based on the corresponding field in the contact profile.
 - “Supervised By: ” with an open text field for the care provider to identify which staff member supervised the call.

- Call Method with dropdown options to specify if the contact was made by phone or video call.
- Adjust the burden estimate to account for an increase in the number of care provider facilities, a decrease in the number of children placed in ORR care, as well as revisions to policies on phone calls in UAC Bureau Policy Guide Section 3.3.10-Calls, Visitation, Mail and Email. The annual number of respondents increased from 216 to 300 and the annual number of responses per response increased from 6,981 to 217.

5. UAC Case (Form S-27):

- Assigned a tracking number to the form (S-27).
- Add “Physical Location of the Child” Field to the UAC Basic Information Section. This will auto-populate with data sourced from the UAC Portal Discharge Tab, presented as an appendix to the form.
- Add “Concurrent Planning: Additional Potential Sponsors” segment to Family Reunification Section with the following fields (which will auto-populate from the Sponsor Assessment (Form S-5, currently approved under this information collection):
 - Potential Sponsor Name
 - Relationship to Child
 - Sponsor Category
- Split the “Know Your Rights Presentation and Legal Screening” into two distinct fields to capture the completion date for each more accurately, acknowledging that they typically are not completed on the same day.
- Add “Back-Up Case Manager” segment to Case Manager Information Section to designate an alternative Case Manager who may take actions on behalf of the primary Case Manager when they are unavailable. The corresponding fields mirror those for primary case manager and will either be system-generated or auto-populate with user account data already entered the system. The fields include:
 - Back-up Case Manager Name
 - Back-up Case Manager Email Address
 - Back-up Case Manager Phone Number
 - Back-up Case Manager Organization
 - Assigned on (MM/DD/YYYY)
- Adjust the burden estimate to account for an increase in the number of care provider facilities and a decrease in the number of children placed in ORR care, as well as the addition of the above listed new segments and fields. The annual number of respondents increased from 216 to 300, the annual number of responses per response decreased from 278 to 217, and the average burden hours per response increased from 0.08 hours to 0.25 hours.

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. Case Manager Call Log and Case Notes (Form S-23):

- Adjust the burden estimate to account for an increase in the number of care provider facilities and a decrease 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 response decreased from 8,426 to 217.

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.