### Home Study and Post-Release Services for Unaccompanied Alien Children

## OMB Information Collection Request 0970 - NEW

# **Supporting Statement Part A - Justification**

**April 2025** 

Type of Request: New

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 UAC Bureau by creating more unique information collections with fewer total forms under each 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 creation of a new information collection: Home Study and Post-Release Services for Unaccompanied Alien Children.

Under this application ORR proposes to revise and transfer one existing form currently approved under the *Administration and Oversight of the Unaccompanied Alien Children Program* (OMB# 0970-0547), one existing form currently approved under *the Release of Unaccompanied Alien Children from ORR Custody* (OMB# 0970-0552) information collection, and four existing forms currently approved under the *Services Provided to Unaccompanied Alien Children* (OMB# 0970-0553) collection.

#### 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 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 while also working to identify and evaluate potential sponsors to take custody of the children post-release. In order to adequately evaluate the suitability of a sponsor and the standard of care they are likely to provide in cases where a child is deemed to be particularly vulnerable due to their age, a medical diagnosis, disability status, trafficking victim status, or other safety concern, ORR will conduct a home-study with the sponsor. An ORR home study includes interviews with the potential sponsor and other household members, as well as an investigation of the living conditions in which the unaccompanied alien child would be placed and occurs prior to the child's physical release. Upon release to the sponsor, and subject to available appropriations, ORR offers post-release services to all cases that have undergone a home study. Post-release services connect sponsors and children with community-based supports to address needs related to education, employment, medical and mental health services, legal services, family stabilization, substance abuse, guardianship, and gang intervention.

ORR uses several instruments to facilitate the home study and post-release services referral process, as well as to document the outcomes of these assessments as required by the Homeland Security Act (6 U.S.C. 279), the Trafficking Victims Protection Reauthorization Act of 2008 (8 U.S.C. 1232), Foundational Rule, 45 C.F.R. §§410.1204, .1210. Forms transferred from the *Administration and Oversight* (OMB# 0970-0547) collection were last

approved May 18, 2022, and expire on May 31, 2025; forms transferred from *Release* (OMB# 0970-0552) collection were last approved, and expire April 30, 2027, and forms transferred from the *Services* (OMB# 0970-0553) collection were last approved by OMB on August 22, 2024 and expire on April 30, 2025. Once approved, the Assessments information collection will contain a total of six (6) unique forms with associated appendices and addendums. An overview of proposed revisions is provided in Section A.15.

#### **Legal Authorities**

**Homeland Security Act (HSA), 6 U.S.C. § 279** – Transferring 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 – Creating, 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** – Establishing a uniform set of standards and procedures concerning the placement, care, and services 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. See 45 C.F.R. § § Part 410.1204 (Home Studies), .1210 (Post-Release Services).

**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** – Establishing 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).

**Investigations of Allegations of Child Abuse and Neglect , 45 C.F.R. Part 412** – Establishing standards, requirements, and procedures for investigations by ORR of allegations of child abuse or neglect of an unaccompanied alien child in ORR custody alleged to have been committed by care provider facility staff, contractors, sub-grantees, volunteers, or other individuals with access to children in ORR care through contracts or grants with ORR, subject to 412.100(c).

*Lucas R. et al v. Becerra et al* (Case No. 2:18-CV-05741 DMG PLA) Disabilities Settlement Agreement — Requiring that children with one or more identified disabilities, or children suspected of having a disability be released to suitable sponsors without unnecessary

delay, and the provision of post-release services to such children and their sponsors.

#### 2. Purpose and Use of the Information Collection

The instruments included in this information collection directly support the safe release of children to suitable sponsors for processing pursuant to the Paperwork Reduction Act. These instruments allow ORR to evaluate the likely standard of care the sponsor will provide the child, assess the sponsor household, and enable ORR to identify and refer sponsors and children to community-based supports to address unmet needs or concerns post-release as required by statute, the Foundational Rule, 45 C.F.R. §§410.1204 (Home Studies), and .1210 (Post-Release Services).ORR Policy Guide Sections 2.4.2 – Home Study Requirement; 2.7 – Recommendations and Decisions on Release; 2.7.1 – Approve Release Decisions; 2.7.4 – Conduct a Home Study before a Final Release Decision Can Be Made; 3.8.2 – Identifying Children with Disabilities in ORR Custody; 3.8.3 – Individualized Section 504 Service Plan; and the entirety of Section 6 – Post Release Services. The instruments are:

- Notification of Concern (NOC) (Form A-7): This instrument is used by home study and post-release service caseworkers, care provider case managers, and the ORR National Call Center (NCC) to notify ORR of certain concerns that arise after a UAC is released from ORR custody. See <u>ORR Policy Guide Section 6.1 Summary of</u> <u>Resources and Services Available After Release from ORR Care</u> for related policies.
- Home Study Assessment (Form S-6): This instrument is used by home study
  providers to document their assessment of a potential sponsor after performing a
  home site visit. See <u>ORR Policy Guide Section 2.4 Sponsor Assessment Criteria and
  Home Studies</u> for related policies.
- Post-Release Services Referral (Form S-19): This instrument is used by ORR
  grantee case managers to refer a UAC for post-release services. It also includes an
  appendix that is used by PRS providers to perform administrative actions needed to
  process PRS cases. See ORR Policy Guide Section 6 Post-Release Services for
  related policies.
- Post-Release Services Report (Form S-22): This instrument is used by post-release service (PRS) providers to conduct virtual check-in calls for children and sponsors after release to ensure the child is safe and refer the sponsor to additional resources as needed. See <u>UAC Policy Guide Section 2.8.4 Safety and Well Being Follow Up Call</u> for related policies.
- Home Study Referral (Form S-26): This instrument is used by ORR grantee case
  managers to refer a UAC for a home study. See <u>ORR UAC Policy Guide Section 2.4</u>
  <u>Sponsor Assessment Criteria and Home Studies</u> for related policies.

Virtual Check-in Questionnaire (Form R-6): This instrument is used by post-release service (PRS) providers to conduct virtual check-in calls for children and sponsors after release to ensure the child is safe and refer the sponsor to additional resources as needed. See <u>UAC Policy Guide Section 2.8.4 Safety and Well Being Follow Up Call</u> for related policies.

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

#### 6. Consequences of Collecting the Information Less Frequently

Not collecting the information requests on these forms would impede ORR from performing its statutory duty of evaluating the suitability of potential sponsors seeking to take custody of unaccompanied alien children. Instruments contained in this collection directly inform release decisions for children deemed especially vulnerable due to their age, medical diagnosis, disability status, trafficking victim status, or other safety concerns. Additionally, these instruments enable ORR to support child safety through the ongoing provision of targeted services to address unmet needs in the sponsor household. The timely collection of this critical information is required by regulation and ORR policy. Furthermore, all grantees and contractors funded to provide assessments and services to UAC and their sponsors 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 December 20, 2024, (89 FR 104183) and provided a sixty-day period for public comment. During the notice and comment period, one (1) comment was received, which is attached in Supplement A.

#### 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 ORR Unaccompanied Children Bureau (UCB) Administrative Program Records, was published on December 12th, 2024, at 89 FR 100500.

#### 11. Justification for Sensitive Questions

Sensitive information is collected on the forms for ORR to provide appropriate services to unaccompanied alien children and sponsors 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 1, 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 ORR contract pricing as noted below, or the national mean hourly wage data from May 2024 (accessed April 7, 2025), for the following Bureau of Labor Statistics (BLS) job codes:
  - O Care Provider Case Manager: 21-1021 Child, Family, and School Social Workers in the industry of Other Residential Care Facilities (62-3900). The rates were multiplied by two to account for fringe benefits and overhead  $$25.53 \times 2 = $51.06$  and total costs were rounded to the nearest whole dollar.
  - O Home Study and Post-Release Services Caseworker/ Provider: 21-1021 Child, Family, and School Social Workers in the industry of Other Residential Care Facilities (62-3900). The rates were multiplied by two to account for fringe benefits and overhead \$25.53 x 2 = \$51.06 and total costs were rounded to the nearest whole dollar.
  - o Contract National Call Center (NCC) Call Specialist: ORR contracted average hourly wage: \$37.91; doubled to account for fringe and benefits yields an average hourly cost of \$75.82. Total costs were rounded to the nearest whole dollar.
  - O Sponsor: ORR uses the Federal minimum non-tipped hourly wage to calculate the opportunity cost to sponsors: \$7.25 (Source: U.S. Department of Labor: Wages; retrieved April 8, 2025) and total cost was rounded to the nearest whole dollar.
  - o Child: ORR does not account for the dollar-value of the UAC's time responding to these instruments; they are responding to these instruments as recipients of mandatory services provided at no charge, are generally ineligible for employment due to their age and/ or immigration status and are doing so in their personal capacity.

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.

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Notification of Concern (Form A-7) – Home Study/ Post- Release Services Caseworker	60	41	0.33	811.8	\$51.06	\$41,451.00
Notification of	300	8	0.33	792.0	\$51.06	\$41,440.00

Concern (Form A-7)						
- Care Provider Case						
Manager						
Notification of						
Concern (Form A-7)	78	31	0.33	797.9	\$75.82	¢60,400,00
- ORR NCC Call	70	31	0.33	/9/.9	\$75.02	\$60,499.00
Specialist						
Home Study						
Assessment (Form S-	60	82	1.00	4,920.0	\$51.06	\$251,215.00
6) – Home Study	00	02	1.00	4,920.0	\$51.00	\$251,215.00
Providers						
Post-Release						
Services Referral						
(Form S-19)- Care	300	217	0.50	32,550.0	\$51.06	\$1,662,003.00
Provider Case						
Managers						
Post-Release						
Services Report						
(Form S-22) – Post-	60	2,722	1.08	176,385.0	\$51.06	\$9,006,249.00
Release Service						
Caseworkers						
Home Study Referral						
(Form S-26)- Care	300	217	0.50	32,550.0	\$51.06	\$1,662,003.00
Provider Case	300	217	0.50	32,330.0	\$31.00	\$1,002,003.00
Managers						
Virtual Check-in						
Questionnaire (Form	65,000	3.0	0.25	48,750.0	\$7.25	\$353,438
R-6) - Sponsor						
Virtual Check-in						
Questionnaire (Form	65,000	3.0	0.25	48,750.0	\$0.00	\$0.00
R-6) - Child						
Virtual Check-in						
Questionnaire (Form	60	3,250.0	0.58	113,100.0	\$51.06	\$5,774,866.00
R-6) – Post-Release	UU	3,230.0	0.50	113,100.0	\$31.00	ψυ, / / 4,000.00
Service Provider						
Estimated Annual Burden Hours and Costs Total:				459,407.34		\$18,852,184.00

#### 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 an ORR Federal Field Specialist at the GS-12 - step 01 2025 basic rate of pay 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	Estimated Annual Total Federal Staff Burden Hours	Average Federal Staff Hourly Wage	Estimated Annual Total Federal Staff Cost
Notification of Concern (A-7)	110	67	0.17	1,216	\$97.18	\$118,137.00
Home Study Assessment (S-6)	110	45	0.50	2,475	\$97.18	\$240,521.00
Post-Release Service Referral (S- 19)	110	591	0.25	16,253	\$97.18	\$1,579,418.00
Post-Release Services Report (S-22)	110	1,485	0.54	88,209	\$97.18	\$8,572,151.00
Home Study Referral (S- 26)	110	591	0.25	16,253	\$97.18	\$1,579,418.00
Virtual Check-in Questionnair e (R-6)	110	1,773	0.13	24,379	\$97.18	\$2,369,127.00
Estimated Annual Burden Hours Total:			148,783	Estimated Annual Cost Total:	\$14,458,772.00	

#### 15. Explanation for Program Changes or Adjustments

#### **DISCONTINUED FORMS**

ORR is discontinuing the following alternate versions of forms transferring to this new collection:

#### • Virtual Check-in Questionnaire (Form R-6) MS Excel Version

- O Modernization: the Virtual Check-in Questionnaire (R-6) has been integrated into the Post-Release Services Application and ORR no longer needs to maintain approval for the excel workbook
- Home Study Assessment (Form S-6) UC Path Version

O The UC Path case management system has been discontinued and forms associated with it were never deployed. ORR is integrating desired UC Path features into UAC Portal forms and discontinuing the associated alternate Path versions.

#### **NEW FORMS**

ORR is not introducing any new forms with this collection.

#### FORMS TRANSFERRED FROM A DIFFERENT INFORMATION COLLECTION

ORR is transferring and revising the following forms currently approved under the following collections: *Administration and Oversight of the Unaccompanied Children Program* (OMB# 0970-0547), *Release of Unaccompanied Children from ORR Custody* (OMB# 0970-0552), and *Services Provided to Unaccompanied Children* (OMB# 0970-0553).

#### 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).
  - Minor terminology edits to conform with UAC Bureau style guide standards as established in the Unaccompanied Children Program Foundational Rule (45 CFR 410) as well as to improve clarity and consistency with other form titles and/or fields.
  - Replace "Primary" language with "Preferred".
  - Replace categories "2A" and "2B" sponsors with "Category 2" to conform with updates to UAC Bureau Field Guidance #26 *Fingerprint Background Checks and Acceptable Supporting Documentation for a Family Reunification Application*, which eliminates the past primary caregiver ("2A") sponsor category distinction.
- 2. Simplify certain fields that capture both date and time to only capture date when the hour and minute of completion or certification of the form are immaterial.
- 3. Add the Physical Location of the Child field to the UAC Basic Information section which populates across many forms in the UAC Portal case management system.

#### FORM-SPECIFIC CHANGES

- 1. Notification of Concern (Form A-7)
  - Add fields to document gang affiliation including the sub-fields:
    - o Gang Affiliation: Child
      - Child self-admission
      - Suspected
    - o Gang Affiliation: Sponsor

- Sponsor self-admission
- Suspected
- Adjust the burden estimate to account for a decrease in the number of children placed in ORR care, reflect that the form is completed by three different groups of respondents, and to reflect an increase in the overall number of fields the respondent will need to complete. The annual number of respondents increased from 60 HS/PRS providers to include 60 HS/PRS providers, 300 care provider case managers, and 78 ORR National Call Center call specialists. The annual number of responses per respondent decreased from 75 responses per HS/PRS Caseworker to 41, with the average number of responses per care provider case manager increasing from 0 to 8 and the average number of responses per ORR National Call Center (NCC) call specialist increasing from 0 to 31. The average burden hours per response increased from 0.25 hours to 0.33 hours to reflect the addition of new fields described above.

#### 2. Home Study Assessment (Form S-6)

- Add the following fields to the "Sponsor Identifying Information" section.
  - O Phone Number
  - O Relationship to Child
  - Marital Status
- Reword existing field labels and add the following fields to the "Case Information" section:
  - Date Referred for Home Study
  - O Current Care Provider Facility Name
  - o Care Provider Staff Name
  - o Care Provider Staff Phone
  - o Care Provider Staff Email
  - Supervisor Phone
  - O Supervisor Email
  - o Caseworker Phone
  - Caseworker Email
  - o Subcontractor Phone
  - O Subcontractor Email
- Under the "Reason for Referral" section:
  - O Change the "Referral Type" field from open text to a dropdown with options for "TVPRA," "Mandated," and "Discretionary"
  - O Change the "Reason for Referral" field from open text to a list of checkbox options that align with reasons a child's case would be referred for a home study per 45 C.F.R. § 410.1204
  - Add an open text field for "Additional Information Supporting Referral" (if Necessary)"
  - O Remove "Concerns to investigate during visit" field

- Under the "Household Members" section:
  - O Change the "Relationship to Sponsor" and "Relationship to Child" from open text to dropdown fields
  - O Add the following fields with "Yes"/"No dropdown:
    - Age
    - Present during home study?
    - Child Abuse/Neglect (CA/N) Check?
    - Sex Offender Registry Check?
    - Fingerprinted?
  - O Remove the following fields:
    - Current Household Member
    - Record ID
    - Related HS Assessment
    - Entry ID
- Remove the following fields from the "Community Resources" section:
  - o HS Assessment
  - o Entry
- Under the "Unaccompanied Alien Child Background" section:
  - O Expand a single question concerning a child's individualized needs impacting their daily function into six discreet questions pertaining to physical disabilities, developmental disabilities (including intellectual or cognitive disabilities), serious health conditions (including mental health conditions) which may be considered disabilities, current medication regimen, special dietary needs, and the routine use of medical equipment. Each new question includes "Yes/No" radio buttons and an open text field for further elaboration if applicable.
  - O Add "Does the child have an individualized Section 504 plan?" with instructions to summarize if yes, concerning the services or accommodations that will need to be maintained post-release. This question was added in response to comments received during the 60-day public comment period.
  - Add a field to document the child's perceived benefits of being released to the sponsor in response to comments received during the 60-day public comment period.
  - O Change the type of response solicited by a question concerning the child's need for support due to criminal, substance use, and gang affiliation histories from "yes/no" radio buttons to checkboxes for each type of history, and add an open text field for further elaboration, if needed.
- Under the "Sponsor Background" section:
  - O Add the following questions:
    - Does the sponsor have a disability? If yes, describe what reasonable accommodations, if any, are required to facilitate the

- child's safe release to the sponsor. This addition is the result of a suggestion ORR received during the 60-day public comment period.
- How does the sponsor manage the concerns reported above?
- Ask the sponsor to list any local resources they rely on or consider to be an asset to the community (ex: libraries, parks, clinics, church, community center, nonprofit organizations, social/ affinity groups, etc.):
- O Follow up: Does the sponsor appear knowledgeable about their community? (Yes/No)
- O Reorganize the three checkboxes confirming that the sponsor was provided certain information into five checkboxes.
- Under the Information Provided to the Sponsor sub-section, add "For a child with an identified disability: The sponsor was provided information regarding the child's disability-related needs and specific post-release services and supports available in the sponsor's community. This addition is the result of a suggestion ORR received during the 60-day public comment period.
- In the Sponsor's Motivation and Relationship to the Child Section, add two open text boxes that will allow for further elaboration when the user selects "yes" for one of the following questions:
  - O Does the sponsor have a family support system in the U.S.?
  - O Was the sponsor aware or involved in the UAC's child's plan to migrate to the U.S.?
- Under the "Sponsor's Parenting Ability" section:
  - O Add the following fields:
    - Is the sponsor aware of state and local laws on supervision of children?
    - If yes, describe the life changes and plans to accommodate the child. (Follow-up to a question concerning expected major life changes for the sponsor)
    - What is the sponsor's understanding of the child's health needs?
    - What is the sponsor's understanding of the child's mental health needs?
  - O Revise the question "Is the sponsor aware of any special needs, mental health or complex needs of the child" to "Is the sponsor prepared to support the health needs of the child?"
- Under the "Legal Services" section, replace the abbreviation "LOPC" with "Legal Orientation Program for Custodians presentation"
- Under the "Financial" section, add "Does the sponsor understand that they are not authorized to charge the child or their family any fees or be reimbursed for their costs?"
- Add the following under the Home and Community Section:

- O Which of the following accessible features are present in the sponsor home? (Checkboxes: Exterior ramps, Elevator, Grab bars, Wide hallways and doorways, Motion-sensitive lighting, Walk/roll-in shower or tub, Low countertops, Raised-height toilet, Other (Please Describe). An open textbox to provide more information if the user selects "Other" is also included.)
- O Are Sleeping Quarters and common areas handicapped accessible?
- O Does the sponsor have knowledge on how to access public transportation?
- Under the "Summary" section:
  - o Clarify the summary question by breaking it into three distinct questions
    - "Summarize any new concerns raised during the home study."
    - "How can these issues or concerns be mitigated and how much time is needed to address these concerns?
    - "Is there an active plan in place to address the above concerns? YES/ NO"
  - O Add "If the outstanding concerns are related to the child's disability, what affirmative support and assistance should ORR provide to enable the child's safe release? Describe the post-release community-based services and supports the sponsor may need help accessing and address whether these services will help enable the child's safe release" This addition is the result of a suggestion ORR received during the 60-day public comment period.
  - Add "What are the potential benefits of releasing the child to this sponsor in this community setting?" This addition is the result of a suggestion ORR received during the 60-day public comment period.
- Adjust the burden estimate to reflect a decrease in the number of home studies conducted resulting from an overall decrease in the projected number of referrals, and an increase in the overall number of fields the respondent will need to complete. The annual number of respondents is unchanged at 60, the annual number of responses per respondent increased from 81 to 82 and the average burden hours per response increased from 0.75 hours to 1.0 hours.

#### 3. Post-Release Services Referral (Form S-19)

- Move the following fields to appear closer to the top of the form:
  - Referral ID
  - o Referral Status
  - o Acceptance Date
  - o Expected Closure Date
- Add the following fields to both the "PRS-TVPRA" section and "PRS" sections under Sponsor Information:
  - O Sponsor Phone Number
  - o Sponsor relationship to Child

- o Sponsor Email
- Add the following fields under both the "PRS-TVPRA" section and "PRS" sections under the "Referring Facility Information" section:
  - o Case Manager Name
  - O Unification Specialist Name
  - O Unification Specialist Email
- Add a new section header called "Referral Information" and group the following fields under the new header:
  - o What Provider Conducted the Home Study
  - o Reason for Referral
  - o Special Instructions
- Add "Additional Details" field with open text next to the "Special Instructions" field.
- For the "Reason for Referral" field under the PRS-TVPRA section, remove the "ORR Discretionary" option and rephrase the "Physical or Sexual Abuse by Caregiver (TVPRA)" field to "Physical or Sexual Abuse (TVPRA)".
- For the "Reason for Referral" field under the "PRS" section:
  - O Rephrase the "Non-relative Sponsor, Multiple Sponsorship (ORR Mandated)" field to "Multiple concurrent sponsorships with at least one unrelated child (ORR Mandated)"
  - O Add an option for "Previously sponsored two or more children (ORR Mandated)"
  - O Rephrase the "UC Going to Non-Relative Sponsor (ORR Mandated No Home Study)" field to "Child Going to Non-Relative Sponsor (No Home Study)"
- Adjust the burden estimate to account for an increase in the number of care provider facilities completing the form since it's last renewal and a projected decrease in the number of children placed in ORR care, as well as the expansion of Post-Release Services, which are now offered to every child. These changes also reflect a slight increase in the overall number of fields the respondent will need to complete. The annual number of respondents increased from 216 to 300, the annual number of responses per respondent increased from 46 to 217 and the average burden hours per response increased from 0.33 hours to 0.5 hours.

#### 4. Post-Release Services Report (S-22)

- Change the form title from "Post-Release Services Event" to "Post-Release Services Report"
- Change manual entry fields to auto-populate wherever possible
- Reword field labels for clarity where needed
- Add instructional text to help the user navigate the form
- Adjust the burden estimate to account for a projected decrease in the number of children placed in ORR care while concurrently expanding post-release services

by offering them to every child. Additionally, the revised burden estimate reflects a slight increase in the overall number of fields the respondent will need to complete. The annual number of respondents remains unchanged at 60, and the annual number of responses per respondent increased from 968 to 2,722. The average burden hours per response increased from 1.0 to 1.08 hours.

#### 5. Home Study Referral (S-26)

- Add radio buttons at the top of the form with the following options:
  - o TVPRA
  - o ORR-Mandated
  - o Discretionary
- Move the following fields to appear closer to the top of the form:
  - o Referral ID
  - o Referral Status
  - o Acceptance Date
  - o Expected Closure Date
- Add the following fields to both the PRS-TVPRA section and PRS sections under Sponsor Information:
  - o Sponsor Phone Number
  - o Sponsor relationship to Child
  - o Sponsor Email
- Add the following fields under both the PRS-TVPRA section and PRS sections under the Referring Facility Information section:
  - o Case Manager Name
  - Unification Specialist Name
  - o Unification Specialist Email
- Add a new section header called "Referral Information" and group the following fields under the new header:
  - O What Provider Conducted the Home Study
  - o Reason for Referral
  - o Special Instructions
- Add "Additional Details" field with open text next to the "Special Instructions" field.
- For the "Reason for Referral" field:
  - Rephrase the "Non-relative Sponsor, Multiple Sponsorship (ORR Mandated)" field to "Multiple concurrent sponsorships with at least one unrelated child (ORR Mandated)"
  - O Add an option for "Previously sponsored two or more children (ORR Mandated)"

- O Rephrase the "UC Going to Non-Relative Sponsor (ORR Mandated No Home Study)" field to "Child Going to Non-Relative Sponsor (No Home Study)"
- Adjust the burden estimate to account for an increase in the number of care
  provider facilities completing the form and a projected decrease in the number of
  children placed in ORR care. These changes also reflect a slight increase in the
  overall number of fields the respondent will need to complete. The annual
  number of respondents increased from 216 to 300, the annual number of
  responses per respondent increased from 46 to 217 and the average burden hours
  per response increased from 0.33 hours to 0.5 hours.

#### 6. Virtual Check-in Questionnaire (R-6)

- Change manual entry fields to auto-populate wherever possible
- Reword field labels for clarity where needed
- Add instructional text to help the user navigate the form
- Adjust the burden estimate to account for an increase in the number of PRS providers completing the form and to better estimate the number of children and sponsors responding to the questionnaire. The annual number of respondents decreased from 128,487 to 65,000 for both children and sponsors and increased from 40 to 60 for PRS providers. The annual number of responses per respondent decreased from 19,273 to 3,250 for PRS providers, and remains unchanged at 3 each for sponsors and children completing all three of the scheduled check-ins.

#### 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.