

In response to the request for public comments on revisions to the Unaccompanied Refugee Minors (URM) Program Application and the Withdrawal of Application or Declination of Placement Form (88 FR 31507), ORR received comments from the Immigrant Defenders Law Center (ImmDef). ImmDef expressed “concern about the use of Significant Incident Reports (SIRs) and their use to deny unaccompanied children placement in the Unaccompanied Refugee Minor Program.” As such, they recommended a number of changes to proposed questions from the URM application, and the addition of others. The following outlines the recommendations and ACF’s responses:

1. **Recommendation:** The questions should be reframed to focus on the child’s needs and strengths, rather than only asking yes/no questions.
 - o **ACF Response:** The existing yes/no questions on the form are necessary for reducing burden on respondents and allowing for faster completion of the form. The yes/no questions in Sections 4.3 and 4.4 are followed by open-ended text boxes to explain more. In these fields, respondents can and typically do provide rich information on the youth’s needs. The proposed form also includes a new required question in Section 4.7 that asks, “Please provide a strengths-based summary of the minor, such as their accomplishments, interests, and overall life goals” with an open text box field. This question will ensure more information on the youth’s strengths are included. As a result, no changes will be made.
2. **Recommendation:** The form should ask what, if any, support ORR provided in response to the SIRs to support the child’s behavioral health and whether those supports would be reasonably available in a community level of care (URM).
 - o **ACF Response:** This type of information is solicited as needed in follow-up comments on the form because this information is not necessary on all applications or for all SIRs. As a result, no changes will be made.
3. **Recommendation:** The section on Section 4.4: Physical Health and Mental Health Information should be placed before Section 4.3 Behavioral Health Information because it will help contextualize any behavioral issues.
 - o **ACF Response:** Applications are reviewed holistically, so the order of these sections does not change the review of an application. As a result, no changes will be made.
4. **Recommendation:** A question asking whoever is filling out the form to answer “is the child a danger to themselves or others” calls for a person who does not necessarily have the appropriate training or experience to assess that to make that determination. The question should be reworded to ask, “Has the child ever been determined by a competent evaluator to present a danger to him/herself or others?”
 - o **ACF Response:** Thank you for this recommendation. We have adjusted this question under Section 4.3 to instead read, “Is the minor a danger to themselves or others, as determined by a clinician or other qualified evaluator?”
5. **Recommendation:** The form should include a comment section at the end whereby the applicant can provide additional information that he or she believes should be taken into consideration.
 - o **ACF Response:** This form does include a comment section at the end. A question in Section 4.7 states “Please use this space to provide any additional comments.”

