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Subject: Non-Substantive Change Request – Placement and Transfer of Unaccompanied Children into ORR Care Provider Facilities (OMB #0970-0554)

This memo requests approval of a non-substantive change to the approved information collection, Placement and Transfer of Unaccompanied Children into ORR Care Provider Facilities (OMB #0970-0554).

BACKGROUND

The Placement and Transfer of Unaccompanied Children into ORR Care Provider Facilities information collection contains 18 instruments that allow ORR place unaccompanied children referred to ORR by federal agencies into care provider facilities and to transfer children within the ORR care provider network 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), and the *Flores* Settlement Agreement (No. CV85-4544-RJK (C.D. Cal. 1996)). The collection was last approved by OMB on June 12, 2023 and expires on June 30, 2026.

ORR is proposing revisions to the Transfer Request form. There are three currently approved variations of this form under this information collection:

- P-10 Transfer Request (UC Portal)
- P-10A Transfer Request (UC Path)
- P-10B Influx Transfer Request (UC Path)

OVERVIEW OF REQUESTED CHANGES

ORR is proposing to remove the two UC Path versions of the Transfer Request from this information collection and revise the UC Portal version of the form.

To improve the process flow and reporting functionality, ORR proposes splitting the currently approved UC Portal version of the Transfer Request (Form P-10) into two forms:

- Transfer Request (Form P-10A)
- Placement Confirmation (Form P-10B)

ORR is also proposing other nonsubstantive revisions to the form, including reorganization of existing sections and fields, rewording, removal of unnecessary/redundant fields, and some minor additions. **Please refer to Appendix A for additional details.**

REASON FOR CHANGE

Revisions were prompted by three guiding principles:

- Child safety
- Expeditious transfer of children into the appropriate level of care
- ORR visibility into all stages of the transfer process

ORR currently lacks visibility into all stages of the transfer process. This limits ORR's ability to measure the amount of time a child spends pending transfer, identify the status of a transfer request at any given time, and to understand where problems occur during the process and how to mitigate them. The redesign of the Transfer Request will better reflect the workflow of the transfer request process and provide ORR with the visibility that it currently lacks.

IMPROVEMENTS RELATED TO BURDEN ON RESPONDENTS

- Organizing prompts for information based on the order of events in the transfer process will make it easier for all users to know where and when to engage with the form to move a transfer request forward.
- Clarifying appropriate responses will decrease the likelihood of respondents entering more data than is required. Now when a user selects an option for a dropdown, subsequent irrelevant data fields are grayed out. Required fields are now clearly marked, so users better understand how the form works.
- Reduces the number of times Federal Field Specialists and Case Coordinators (contractors) must review the form. While their sign off is still required for the Placement Confirmation (Form P-10B), it is only required in the Transfer Request (Form P-10A) when recommending transfer to a different level of care (i.e., step up or step down); it is no longer required for lateral transfers.

METHODS USED TO DETERMINE NECESSARY CHANGES

- **Process Mapping:** Used to help understand the current workflow, where it is getting slowed down by the structure of the existing form, when different users must collaborate, and what process flows need to remain intact in the revised forms.
- **Interviews:** Conversations were held with federal staff in various roles and less than 10 respondents to help ORR understand what different users need to accomplish during the transfer process and what policy rules needed to exist in the new design.
- **Clickable Prototype:** Used to facilitate conversations with users about what the revised forms would look like to ensure the flow and interactions were correct.