



United States
Conference of
Catholic Bishops

Office of the
General Counsel

3211 Fourth Street, NE
Washington, DC
20017

202.541.3000
uscgb.org

Submitted via email

December 1, 2025

Office of Refugee Resettlement
Administration for Children and Families
U.S. Department of Health and Human Services
Mary E. Switzer Building
330 C ST SW, Room 5123
Washington, DC 20201

Re: Expedited Office of Management and Budget Review and Public Comment:
Placement and Transfer of Unaccompanied [Alien] Children Into ORR Care Provider
Facilities (OMB # 0970-0554)

Dear Ms. Salazar,

On behalf of the United States Conference of Catholic Bishops (USCCB), we appreciate the opportunity to comment on the Office of Refugee Resettlement's notice entitled "Expedited Office of Management and Budget Review and Public Comment: Placement and Transfer of Unaccompanied [Alien] Children Into ORR Care Provider Facilities." The USCCB has historically partnered closely with the Office of Refugee Resettlement to protect the wellbeing of unaccompanied noncitizen children while, in all respects, adhering to the Catholic Church's teachings on the God-given dignity of the human person, created male and female (Genesis 1:27). The USCCB is deeply concerned about the safety of all children, including those who immigrate to the United States unaccompanied.

In that light, we write specifically in support of the proposed changes to *Notice of Placement in a Restrictive Setting (Form P-4)* and *Unaccompanied [Alien] Child Referral (aka Intakes Placement Checklist) (Form P-7)* that would align the terminology in those forms with the directives of Executive Order 14168 *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*. Namely, we understand that, for both forms, the field to designate the child's "Gender" would be replaced with "Sex," and for Form P-7's field to identify the reason that a requested placement was not accepted, the option "No capacity for gender" would be replaced with "No capacity for sex." We abstain at this time from commenting on, or expressing any positions in relation to, other changes addressed in this notice.



The Catholic Church has explained that “biological sex and the socio-cultural role of sex (gender) can be distinguished but not separated. Therefore, all attempts to obscure reference to the ineliminable sexual difference between man and woman are to be rejected: [w]e cannot separate the masculine and the feminine from God’s work of creation, which is prior to all our decisions and experiences, and where biological elements exist which are impossible to ignore. Only by acknowledging and accepting this difference in reciprocity can each person fully discover themselves, their dignity, and their identity.” ([Dignitas infinita](#), 59). Furthermore, the Church teaches that “[i]n this cultural context, it is clear that sex and gender are no longer synonyms or interchangeable concepts, since they are used to describe two different realities... the concept of gender is seen as dependent upon the subjective mindset of each person, who can choose a gender not corresponding to his or her biological sex, and therefore with the way others see that person (transgenderism).” ([Male and Female He Created Them](#), 11).

By replacing the references in Forms P-4 and P-7 to “gender” with “sex,” the proposal reflects a true anthropology that is grounded in the biological sexual identity that is either male or female, an anthropology that promotes human flourishing.

Thank you for considering our comment.

Respectfully submitted,

William J. Quinn
General Counsel

Daniel E. Balserak
Assistant General Counsel