

Office of Refugee Resettlement Unaccompanied Refugee Minors Program Application and the Withdrawal of URM Program Application or Declination of URM Program Placement Forms

**OMB Information Collection Request
0970 - 0550**

Attachment - Summary of Public Comments and ORR Responses

July 2026

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

In response to the request for public comments on revisions to the Unaccompanied Refugee Minors (URM) Program Application and the Withdrawal of URM Program Application or Declination of URM Program Placement Form (OMB #: 0970-0550), ORR received three public comments from the Immigrant Defenders Law Center, the National Center for Youth Law, and the Young Center. The following outlines the comments/recommendations and ORR's responses:

General Comments

1. One commenter expressed concerns that the number of document uploads required for the URM application has increased.
 - o **ORR Response:** Minimal changes have been made to the number of document upload fields on the URM application form. Rather, the location of the fields has changed. These fields previously appeared at the end of the form; ORR has moved the fields to be integrated throughout, to allow for faster application completion. The number of documents uploaded to an application varies based on how questions are answered. This remains true in the revised form, though the maximum number of documents is displayed in the Word document. Many of the document upload fields are not required or not applicable based on the way questions are answered. Assistants will continue to be able to submit URM applications even if certain documents are not uploaded. As a result, no changes to the application form will be made.
2. Commenters recommended adding language throughout the form that would remind ORR or other reviewers how certain information should be considered during the eligibility determination process and URM placement process, particularly with respect to disability-related information, behavioral and mental health history, placement decisions, and consideration of reasonable accommodations. Commenters recommended adding language that reminds reviewers that disability-related information cannot be used to categorically exclude children from the URM Program and that reasonable accommodations must be considered.
 - o **ORR Response:** ORR appreciates these recommendations but is not making changes to the application in response. The purpose of the application is to collect information necessary for ORR to determine URM eligibility and facilitate a minor's placement into the URM Program. The application is not intended to serve as a comprehensive statement of ORR policies, procedures, or legal requirements governing program administration. ORR reviews URM applications in accordance with applicable statutes, regulations, policies, and internal procedures. The Office of Refugee Resettlement's Refugee Program Bureau—including the URM Program—reviews URM applications and administers services in accordance with applicable federal civil rights laws and nondiscrimination requirements, including those described in 29 U.S.C. § 794(a) and 45 C.F.R. § 85.21(a), (b)(1)(i), (b)(3). ORR does not use disability status to determine eligibility for the URM Program and provides reasonable accommodations as required by Section 504. Because the recommendation concerns internal review procedures and staff decision-making rather than the information being collected, ORR has determined that additional guidance is not necessary within the application itself.
3. Commenters recommended that ORR provide a mechanism within the URM application for attorneys, accredited representatives, Child Advocates, and other legal service providers to

contribute information and recommendations relevant to the application and placement process. Specifically, commenters suggested encouraging consultation with legal counsel prior to application submission, providing an opportunity to indicate whether counsel has been consulted, and allowing legal representatives or Child Advocates to submit best-interest recommendations/determinations and other case-specific information. Commenters argued that these individuals often possess important knowledge regarding the child's immigration case, family circumstances, community connections, behavioral and mental health history, and support needs that may not otherwise be reflected in the application. They stated that such input would help place information in appropriate context, support best interest determinations, and assist ORR and URM providers in identifying placements, services, accommodations, and supports that promote the child's long-term success in the URM Program.

- o **ORR Response:** ORR appreciates this recommendation and agrees that legal service providers and child advocates can provide valuable information for a URM application. However, incorporating legal service providers or child advocates into the submission process directly would be administratively burdensome and delay application submissions. Rather, ORR recommends that assisters consult with others, as appropriate, to ensure the application is completed accurately and completely. Accordingly, ORR has added a bullet to the form instructions stating: "ORR recommends that case managers or others who are completing the application consult with other appropriate individuals to ensure that the information in the application is accurate and complete. This could include but is not limited to clinicians, medical providers, educators, legal services providers, or child advocates."

ORR also appreciates the recommendation for a system to upload child advocate's best interest determinations (BIDs) at the time of application submission. ORR believes it is too administratively burdensome to develop a system for child advocates to upload BIDs directly in the application form. However, ORR has added back in an optional document upload field in Section 9 of the application to allow assisters to upload any available URM Program BID written by a child advocate at the time of application submission. This document upload field was previously available, but ORR had recommended removing it because most URM Program BIDs are not yet completed by the time of application submission. However, due to this public comment, ORR is re-instating this field.

Additionally, as described more below, ORR has also revised the placement considerations question in Section 4 to include recommendations from legal service providers and child advocates.

4. One commenter expressed concerns with the term "Unaccompanied Alien Children" used in the form and requested that the forms do not include the word "alien."
- o **ORR Response:** ORR appreciates the concerns raised about the use of the word "alien" in the term "unaccompanied alien child" (UAC). The term "unaccompanied alien child" is defined in the Homeland Security Act of 2002 (6 U.S.C. § 279(g)(2)) as a person who:
 - Has no lawful immigration status in the United States,

- Is under 18 years old, and
- Has no parent or legal guardian in the U.S. available to provide care and custody.

In 2025, ORR revised its policy documents—as noted in the Record of Posting and Revision Dates section of the ORR Unaccompanied Alien Children Bureau Policy Guide—replacing the term “unaccompanied child” with the statutory term “unaccompanied alien child” and the acronym “UC” with “UAC”.

(<https://acf.gov/orr/policy-guidance/unaccompanied-children-program-policy-guide-record-posting-and-revision-dates>). This terminology change better aligns ORR policy documents with the terminology used in federal law. This change also clarifies that the program specifically serves children who meet the immigration-related element of the legal definition. ORR is not making changes to the term “unaccompanied alien child” (UAC) in the application form, for the reasons stated above.

Comments on Individual Questions/Sections

Section 2

5. One commenter expressed concerns with the response options for sex being limited to male and female.
 - o **ORR Response:** ORR appreciates the concerns about the binary options for the applicant’s “sex” in Section 2, however, due to administrative policy, ORR is not making changes to the response options.
6. One commenter expressed concerns with the document upload fields for age/identity documentation and Alien number (A#) verification, stating that the fields do not align with ORR policy.
 - o **ORR Response:** ORR appreciates these concerns but would like to clarify that no changes have been made to required age and identity documentation. ORR continues to follow URM Program Policy Guide 1.4, as is referenced on the form. The field to upload the documentation was moved from the end of the form to Section 2. Due to this comment, ORR has revised the wording on the document upload field to state “Preferred documentation is from the minor’s country of origin, such as a birth certificate.”

Additionally, no changes have been made to documentation to verify a minor’s A#; the field to upload the documentation was moved up to appear earlier in the form. ORR must ensure that typos were not made when completing the form and a DHS-issued document is the official record of a minor’s correct A#. ORR does not issue A#s, therefore, ORR-issued documents do not verify A#s. The form already provides guidance on what to do if the assister does not have DHS-issued documentation that verifies the minor’s A#. As a result, no changes to the application form will be made.
7. Two commenters expressed concerns that the form requests the assister to upload the youth’s UAC Assessment and Case Review. Commenters noted that these documents contain extensive information about a child’s medical history, mental health history, substance use history, family

background, and other sensitive information. They stated that the application does not explain how ORR uses this information when reviewing URM applications. They also expressed concern that information contained in these assessments could be interpreted as affecting eligibility for the URM Program rather than informing placement planning and service needs.

- o **ORR Response:** The requirement to submit the minor's UAC Assessment and Case Review is not a new requirement and has been part of the URM application process in prior versions of the form. The field to upload these documents was moved from the end of the form to Section 2. ORR and URM providers use the information in these forms to fully understand a minor's history, journey to the United States, and a snapshot of the minor's time in ORR care. These documents help verify the accuracy of other information entered into the application form. The documents also help ORR and URM providers identify appropriate placement resources, supports, accommodations, and services necessary to meet the minor's needs and promote long-term placement stability. Because these documents serve an important purpose and have long been required as part of the application process, no changes to the application form will be made.

Section 4

8. Two commenters requested clarification regarding the statement that eligible minors are referred to all URM placement locations and placement types "unless there is a reason not to." They recommended that ORR provide examples or guidance explaining circumstances that may limit referrals to particular locations or placement types.
 - o **ORR Response:** Most minors are widely referred to all URM placement locations and placement types. Examples of circumstances where ORR may target the referral for only certain locations could include that the minor has requested to only be referred to a specific state or region or that placement in a specific location could facilitate reunification with a sibling or other family member who is in the URM Program. An example of a circumstance where ORR may refer for only certain types of placements could include minors who are tender age and therefore are too young for supervised independent living placements. ORR is not making changes to this statement in the application form, as it remains factually true.
9. Three commenters expressed concern with removing questions related to the "Minor's Preferences" for placement in the URM Program. Commenters argued that eliminating this section reduces opportunities for children to provide input regarding their future placement and limits consideration of their preferences during the placement process. One commenter also expressed concerns about removing the questions related to the current provider's recommendations for placement. One commenter requested adding question(s) to this section for legal service provider's input on placement locations.
 - o **ORR Response:** ORR appreciates these concerns and agrees that it is important to consider many factors when determining URM placement including the minor's preferences, the current provider's recommendations, and any input from a legal service provider (LSP). However, the prior questions often resulted in incomplete answers, duplicated information, and were administratively burdensome on assisters. ORR has replaced these questions with one streamlined question. As a result of these

comments, ORR has revised this question to specify that the minor's preferences or any recommendations from the current provider or LSP can be provided in answer to this question: "Explain any considerations for where this minor is referred or the types of placements the minor is offered, *including the minor's preferences or any recommendations from the current care provider team, child advocate, or legal service provider.*" One streamlined text box will reduce burden on respondents while retaining necessary information.

Section 6

10. One commenter expressed concern that the proposed revisions significantly expand the amount of information required on sponsors and family reunification efforts.

- o **ORR Response:** The amount of information requested on sponsors has not changed, however, the format for providing the information has. ORR has replaced one large open-ended text box with a series of discrete, clear questions about sponsors. This will ensure ORR and URM providers have consistent information on all sponsors who have been considered for a minor and will reduce the time it takes for ORR to clarify sponsors with assisters. Complete information on sponsors will help ORR expeditiously confirm the minor's eligibility for the URM Program per URM Program Policy 1.2. ORR maintains that the revision is necessary to verify a minor's eligibility for the URM Program in the most efficient manner possible.

Section 7

11. Two commenters expressed concern that the URM Program application could result in children with disabilities, mental health conditions, trauma histories, or higher behavioral health needs being disadvantaged during the application review process. Specifically, commenters objected to the collection of behavioral health history, mental health history, current health conditions, medication use, accommodations, and Significant Incident Reports (SIRs) during the application process.

Commenters stated that these questions could create the appearance that disability-related information is being used to determine eligibility for the URM Program rather than to assess placement needs and appropriate services. They recommended that ORR clarify that such information is collected solely to support individualized placement planning, service coordination, and identification of appropriate supports and accommodations. Commenters recommended removing or deferring certain health and disability-related questions until after a child has been determined eligible for the program.

Commenters also recommended that ORR provide additional language reminding reviewers that placement decisions should be individualized, that children should not be excluded from the URM Program based solely on disability-related factors, mental health history, trauma history, or prior behavioral incidents, and that reasonable accommodations and supportive services should be considered when evaluating placement options. Commenters also expressed concern with the move from text fields to checkboxes for questions related to the minor's physical, behavioral, and mental health and recommended removing these questions from the form. Commenters suggested that ORR could ask questions related to the youth's needs after "the URM Program has accepted a child."

- o **ORR Response:** ORR appreciates these comments and clarifies that information regarding a minor's behavioral health history, mental health history, current health conditions, medication use, accommodations, and Significant Incident Reports is collected to support individualized assessment, placement planning, and service coordination by ORR and by prospective URM providers. ORR has long-standing comprehensive internal procedures that require ORR staff to review an application holistically to both confirm a minor's eligibility for the URM Program and to ensure any proposed placements are appropriate for the particular minor. ORR must ensure minors meet all eligibility criteria for the URM Program, listed in the URM Policy Guide Section 1.2. ORR does not use disability status, including behavioral or mental health conditions, or any reasonable accommodations to determine eligibility for the URM Program. Information collected through the application assists ORR and URM providers in identifying appropriate placement types, resources, supports, accommodations, and services necessary to meet the minor's needs and promote long-term placement stability. As such, ORR must continue to collect information on the minor's health, needs, and history, including all supporting documents (such as SIRs). URM providers must have access to this information prior to offering a placement to a minor, to ensure the proposed placement will meet the minor's needs. Learning more information on a minor's history after a placement is offered would result in placement retractions by URM providers due to the placement not having appropriate supports. Having this information from the beginning ensures that proposed placements will support a minor's long-term well-being.

ORR appreciates the concerns with the transition from text boxes to check box questions in this section. However, ORR affirms that this shift will allow for faster application completion by assisters and faster review by ORR and URM providers. The prior text boxes in the form were sparsely completed, provided discrepant information from documentation, and were minimally useful to URM providers seeking to quickly understand a minor's history. The new checkbox questions will facilitate faster review, as they will allow ORR and URM providers to quickly understand what additional information they should look for in the supporting documentation uploaded.

ORR reviewed the application language in light of these comments and considered whether additional clarifying language would improve responses to these questions. As a result, ORR added text in Section 7 to state that the information collected "supports ORR and URM providers in determining the most appropriate placement for the minor including necessary supports, accommodations, and services."

12. One commenter suggested restoring the language "as determined by a clinician or other qualified evaluator" to the question on danger to self.

- o **ORR Response:** This comment is inaccurate. ORR did not cut the language "as determined by a clinician or other qualified evaluator" as the comment implies. That wording remains in the application, so no change is needed.

13. One commenter suggested asking if the minor is currently a danger to self separately from the question if the minor is currently a danger to others.

- o **ORR Response:** ORR agrees that there is value in distinguishing between these items and has separated these items into two checkboxes.
- 14. One commenter recommended making the therapeutic support question in this section mandatory and recommended rephrasing the question.
 - o **ORR Response:** ORR appreciates this suggestion and has updated this question to be mandatory. ORR appreciates the suggested rewording but feels it could be confusing to assisters. ORR has instead rephrased this question to say, "Explain any recommended therapeutic supports that this minor should receive if he/she enters the URM Program, to ensure the minor will have the support necessary for success."