

To: Kelsi Feltz
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Kristie Ross
Office of Refugee Resettlement (ORR)
Administration for Children and Families (ACF)

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Subject: Non-Substantive Change Request – Release of Unaccompanied Children from ORR Custody (OMB #0970-0552)

This memo requests approval of non-substantive changes to the approved information collection, Release of Unaccompanied Children from ORR Custody (OMB #0970-0552).

BACKGROUND

The “Release of Unaccompanied Children from ORR Custody” information collection contains 14 total instruments that enable the Office of Refugee Resettlement (ORR) to process the release of unaccompanied alien children from ORR custody and provide post-release services. The forms included in this Non-Substantive Change Request are:

- R-2 Discharge Notification: Used to document and communicate a child’s discharge from ORR care and custody, including key details about the release and post-release arrangements.
- R-4 Release Request: Used to initiate and document the request to release a child from ORR custody to a vetted sponsor, including sponsor information and approval details.
- R-6 Virtual Check-In Questionnaire: 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.
- R-9 Category 4 Discharge Plan: Used for discharge planning for children who have complex discharge cases, such as aging out of ORR care and custody.
- R-10 Program Exit Processing: Used to complete and record final case actions at the time of a child’s exit from ORR care, ensuring all required discharge steps, documentation, and case closures are completed.

The collection was last approved by OMB on April 2, 2024, and the current expiration date is April 30, 2027.

ORR has identified updates needed to these forms which are non-substantive as they do not alter the underlying data collected, respondent burden, or the purpose of the collection. The updates are intended to:

- Align terminology with statutory requirements and Administration priorities
- Improve clarity, usability, and consistency across forms
- Ensure compliance with updated ORR policies and procedures

OVERVIEW OF REQUESTED CHANGES

1. Title Revision

ORR will update the title of the information collection to reflect statutory terminology:

Current Title	Proposed Title
Release of Unaccompanied Children from ORR Custody	Release of Unaccompanied Alien Children from ORR Custody

2. Removal of Form R-6

ORR proposes removing the Virtual Check-In Questionnaire (Form R-6) from this collection.

- The instrument has been transferred to *Home Study and Post-Release Services for Unaccompanied Alien Children* information collection (OMB #0970-0645), which was approved by OMB on July 18, 2025
- The related burden has been removed from this OMB number, but is accounted for under OMB #0970-0645

3. Terminology Updates (Executive Order 14168)

Consistent with Executive Order 14168, ORR will update “gender” with “sex” across applicable instruments.

Affected instruments:

- R-2 Discharge Notification (Current UAC Portal)
- R-10 Program Exit Processing (Modernized UAC Portal)
- R-4 Release Request (Current and Modernized UAC Portals)
- R-9 Category 4 Discharge Plan

4. Terminology Standardization (UAC Policy Guide)

ORR will standardize terminology across applicable instruments to align with the February 27, 2025, updates to the UAC Bureau Policy Guide, ORR will:

- Replace “unaccompanied child” with “unaccompanied alien child”
- Replace “UC” with “UAC”

Applied to:

- R-2 Discharge Notification
- R-10 Program Exit Processing
- R-4 Release Request (Current and Modernized systems)
- R-9 Category 4 Discharge Plan

5. Revisions to Category 4 Discharge Plan (Form R-9)

The Category 4 Discharge Plan is used by care providers to communicate essential information to post-discharge caregivers. Proposed updates align the form with current policy and improve usability, structure, and consistency. As the policies moved through clearance, some edits were incorporated.

A. Overall Enhancements

- Streamlined structure and organization

- Improved clarity and readability
- Alignment with current and forthcoming ORR policy and procedural guidance
- Support for consistent discharge planning practices across the ORR UACB network, which currently can vary
- Removed duplicative instructional information that is already in policy or procedures from the form
- Rearranged the form into 10 clearly labeled and organized “Sections”. This resulted in moving questions and instructions to relevant sections and the removal of 3 “Parts” (information moved from the “Parts” into appropriate “Sections”).

B. Cover Page Updates

- Removed instruction page in the front as to not duplicate information already in sub-regulatory guidance
- Form reorganized: previous OMB approved version used Part I, Part 2, and Part 3; the updated briefing version uses 10 numbered sections.
- OMB date updated: lists OMB 0970-0552 valid through 04/30/2027

C. Section Revisions

- Shorter opening/background: removes much of the previously approved introductory explanation about Category 4 cases and moves more directly into the form. The introductory explanation is located in sub-regulatory guidance.
- Terminology updated: uses UAC Bureau/UAC Policy/UAC MAP more consistently instead of using UC.
- Safety and risk content separated out: creates a dedicated Section 4: Safety and Risk Management for safety plans, post-discharge contact consent, and trafficking/OTIP referrals.
- OTIP timing clarified: says trafficking referrals should be made before the child’s 18th birthday and at least 30 days before discharge.
- Refugee benefits language updated: references coordination between DCA-FFS and ORR Division of Refugee Children Services staff and includes ORRRefugeeChildren@acf.hhs.gov and RefugeeEligibility@acf.hhs.gov.
- Legal Services Plan streamlined: keeps Attorney of Record and Child Advocate fields but removes the standalone LSP contact/recommendation fields.
- Voluntary Departure: section removed
- Healthcare section updated: clearly states that the complete Discharge Plan is never shared with DHS and that ORR will not share health and mental health information with DHS.
- Medication fields revised: The updated briefing version asks whether the child has a 30-day minimum supply or the remainder of a time-limited course, plus refill information.
- Parenting/Medicaid details simplified: updated briefing version asks more generally about healthcare coverage for the child and/or their children.
- Residential Plan removed and put in case management section
- Signature timing changed: The previous version said Post-18 signatures were needed two weeks before the child turns 18; the updated briefing version says age-out signatures are needed 30 days, only if possible, before the child turns 18.

- Consent/release language updated: adds language about the Authorization for the Release of Records (ARR, Form A-5) and redaction of medical and mental health information if the child does not consent.

TIME SENSITIVITIES

R-9 Category 4 Discharge Plan This form is tied to recently approved policy and procedures that ORR wishes to disseminate concurrent with this revised form. To support consistent implementation and avoid operational gaps, ORR intends to release the revised form concurrently with the associated guidance.