

**Office of Refugee Resettlement
Unaccompanied Refugee Minors Program: ORR-
3 Report and ORR-4 Report**

**OMB Information Collection Request
0970 - 0034**

**Supporting Statement Part A -
Justification**

October 2026

Type of Request: Extension with Revision

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

1. Circumstances Making the Collection of Information Necessary

The Refugee Act of 1980, Pub. L. No. 96-212, 8 U.S.C. 1522, amended the Immigration and Nationality Act to create a domestic refugee resettlement program that provides assistance and services to refugees resettling in the United States. With the enactment of this legislation, the Office of Refugee Resettlement (ORR) established comprehensive requirements for a State-administered refugee resettlement program including child welfare services to unaccompanied refugee minors. Originally, the Unaccompanied Refugee Minors (URM) Program provided services for refugee minors arriving from overseas unaccompanied by a parent or adult relative. Over the years, Congress passed laws making other special populations already in the United States eligible for the URM Program.

The Unaccompanied Refugee Minors (URM) Program currently operates in 14 states and the District of Columbia via 16 state or replacement designee grant recipients. The URM Program provides the same range of child welfare benefits and services available to other foster children in those states as well as services required by ORR regulation and policy guidance. URM Program benefits and services are provided in accordance with State Title IV-B and IV-E child and family service plans, Federal and State regulations, and ORR policy guidance. Participants in the URM Program are placed with licensed providers by the state or local government agencies based on the provider's licensed capacity and the minor's specific needs.

The Director of ORR is required by the Refugee Act of 1980 to prepare and maintain a list of unaccompanied children who have entered the United States; the names and last known residence of their parents (if living) at the time of arrival; and the children's location, status, and progress. Additionally, the Act requires ORR to submit a report to Congress each year which summarizes the location and status of unaccompanied refugee children admitted to the United States. ORR regulations at 45 CFR 400.120 describe the specific URM Program reporting requirements prescribed by the Director. These requirements are implemented through the ORR-3 and ORR-4 reports.

The current OMB expiration date for this information collection is November 30, 2026. We are requesting approval for a three-year extension with proposed revisions to the information collection. We are proposing a 12-month implementation timeframe for executing revisions, during which time we will continue to use the currently approved forms. The implementation timeframe is necessary to allow the database contractor sufficient time to build, test, and execute the form revisions. Proposed revisions to the forms include replacing multiple follow-up outcome reports with a single termination outcome report, relying on provider assessment in outcome reporting, replacing or streamlining unclear questions and response options, eliminating select sub-types of ORR-3 reports, removing unnecessary questions, and streamlining supplemental report instructions to integrate more instruction into the forms directly. As a result of these changes, the total burden hours for this

information collection have been reduced. See section A15 for additional information on the changes.

2. Purpose and Use of the Information Collection

The information collected in the ORR-3 and ORR-4 reports enables ORR to meet its statutory obligation to maintain data on all youth served by the URM Program. This information collection must continue uninterrupted to ensure ORR meets its statutory obligation.

The ORR-3 report form allows ORR to report annually to Congress the location and status of youth served by the URM Program. This form collects basic information on all youth including entry/ termination dates, biographical information, placement information, legal responsibility of the youth, and program enrollments. This form also helps ORR track and confirm a youth's ongoing eligibility for the URM Program. The first ORR-3 report is submitted within 30 days of the youth's initial placement into the URM Program. Subsequent ORR-3 reports to report changes in the youth's case, termination, or re-entry are submitted within 60 days of the reportable change.

The ORR-4 report form allows ORR to track youth progress over time in achieving key program goals. This form collects information on the services the youth received and the youth's outcomes. The ORR-4 report is submitted once annually and at the time of termination from the URM Program. The report is due no later than 60 days after the youth's anniversary of his/her initial placement in the program and no later than 60 days after the youth's termination.

Both report forms are critical tools in ORR's program oversight responsibilities. They allow ORR to receive timely and mandated data on each child, verify children's ongoing eligibility, track progress and outcomes, and monitor provision of required services.

3. Use of Improved Information Technology and Burden Reduction

ORR-3 and ORR-4 reports are completed by URM provider agencies and submitted by state/replacement designee agencies via a secure, web-based data collection system called Refugee Arrivals Data System (RADS). The use of this technology has helped:

- Simplify information collection for providers and the review process by states/replacement designees;
- Standardize data entry and increase reporting accuracy;
- Allow information to reach ORR in a timely manner;
- Enable ORR to centrally manage the data collection process;
- Improve ORR's ability to analyze data along several parameters to assess program performance and client outcomes; and
- Enhance quality control.

4. Efforts to Identify Duplication and Use of Similar Information

The ORR-3 and ORR-4 reports are unique to ORR and there is no duplicative data collection on URM youth.

5. Impact on Small Businesses or Other Small Entities

This information collection does not burden or impact small businesses.

6. Consequences of Collecting the Information Less Frequently

Current regulations at 45 CFR 400.120 outline the reporting requirements.

The state must submit the ORR-3 form within:

- 30 days of the date of a minor's placement in the state. This report serves to notify ORR that the minor is in care, that proper legal arrangements have been made for the minor, and that financial claims for the minor's care will commence.
- 60 days of the date of a change in the minor's placement or legal responsibility of any kind for the minor is established or transferred. This information enables ORR to fulfill its statutory obligation to maintain a record of the minor's location for family reunification purposes, if applicable.
- 60 days of the date of case closure due to emancipation or reunification with a parent or other adult with custody. This information serves to notify ORR that financial support for the case will terminate.

The state must submit the ORR-4 form for each youth annually, beginning approximately 12 months from the date of the initial placement report.

To require either of these reports less frequently would both undermine their purpose and violate legislative and regulatory requirements.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This proposed information collection will not entail any special handling procedures as indicated in the OMB guidance for Paperwork Reduction Act processing.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on August 5, 2026, Volume 91, Number 149, page 50551, and provided a sixty-day period for

public comment. We did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift to respondents will be provided.

10. Assurance of Confidentiality Provided to Respondents

ORR has established a system of records to ensure the level of confidentiality pursuant to the Privacy Act, 5 U.S.C. 552(a). The system used to collect ORR-3 and ORR-4 reports, ORR's Refugee Arrivals Data System (RADS), is a Privacy Act System of Records. A System of Records Notice for RADS under 09-80-0325 was published on July 18, 2016, and modified on February 8, 2022.

11. Justification for Sensitive Questions

The ORR-3 form collects basic demographic information, including a youth's religion. Current regulations at 45 CFR 400.118 require case planning to address preservation of the child's ethnic and religious heritage. Collecting this information is necessary to support ORR's oversight and monitoring of compliance with this regulation.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

Respondents will use the currently approved materials for an implementation time period of 12 months. Tables 1-3 include estimated burden for the implementation time period for each respondent type.

Tables 4-6 below provide the annual burden estimates for the revised forms. The annual number of respondents was estimated by examining historical data and trends in the number of respondents over time. The time estimated per response is based on data collection experience to date and feedback from respondents on the current forms.

Tables 7-9 provide a summary of the average annual burden over three years, based on an implementation period of 12 months.

Estimated Cost to Respondents

URM State/Replacement Designee Agencies

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2025, which is \$22.93 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$45.86. For the 12-month implementation period, the estimate of annualized cost to respondents for hour burden is \$45.86 times 1,244 hours or \$57,050 (see Table 1). After revised forms are implemented, the estimate of annualized cost to respondents for hour

burden is \$45.86 times 758 hours or \$34,780 (see Table 4). https://data.bls.gov/oesprofile/?major_group=210000&occupation=211093&measure=01&areas=INDUSTRY,STATE,MSA

URM Provider Agencies

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2025, which is \$22.93 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$45.86. For the 12-month implementation period, the estimate of annualized cost to respondents for hour burden is \$45.86 times 2,376 hours or \$108,963 (see Table 2). After revised forms are implemented, the estimate of annualized cost to respondents for hour burden is \$45.86 times 1,670 hours or \$76,605 (see Table 5). https://data.bls.gov/oesprofile/?major_group=210000&occupation=211093&measure=01&areas=INDUSTRY,STATE,MSA

URM Youth

The cost to respondents for URM youth was calculated using the Bureau of Labor Statistics (BLS) federal minimal wage, which is \$7.25 per hour based on the Fair Labor Standards Act. For the 12-month implementation period, the estimate of annualized cost to respondents for hour burden is \$7.25 times 516 hours or \$3,741 (see Table 3). After revised forms are implemented, data collection will be discontinued with URM youth, therefore, the estimate of annualized cost to respondents is \$0 (see Table 6). <https://www.dol.gov/agencies/whd/minimum-wage>

Table 1. State/Replacement Designee Agencies Estimated Annual Burden for Current Form in Use During 12-month Implementation Period

Implementation year materials are located at:

https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202310-0970-001

Information Collection Title	Total Number of Annual Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ORR-3 Report	16	135	0.25	540	\$45.86	\$24,764
ORR-4 Report	16	88	0.50	704	\$45.86	\$32,285
Estimated Annual Burden and Cost Totals:				1,244	-	\$57,050

Table 2. URM Provider Agencies Estimated Annual Burden for Current Form in Use During 12-month Implementation Period

Implementation year materials are located at:

https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202310-0970-001

Information Collection Title	Total Number of Annual Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ORR-3 Report	24	90	0.50	1080	\$45.86	\$49,529

ORR-4 Report	24	54	1.0	1296	\$45.86	\$59,435
Estimated Annual Burden and Cost Totals:				2,376	-	\$108,963

Table 3. URM Youth Estimated Annual Burden for Current Form in Use During 12-month Implementation Period

Implementation year materials are located at:

https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202310-0970-001

Information Collection Title	Total Number of Annual Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ORR-4 Report	1032	1	0.50	516	\$7.25	\$3,741
Estimated Annual Burden and Cost Totals:				516	-	\$3,741

Table 4. State/Replacement Designee Agencies Estimated Annual Burden for Revised Forms after Implementation

Information Collection Title	Total Number of Annual Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ORR-3 Report	16	117	0.20	374	\$45.86	\$17,170
ORR-4 Report	16	96	0.25	384	\$45.86	\$17,610
Estimated Annual Burden and Cost Totals:				758	-	\$34,780

Table 5. URM Provider Agencies Estimated Annual Burden for Revised Forms after Implementation

Information Collection Title	Total Number of Annual Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ORR-3 Report	24	78	0.40	749	\$45.86	\$34,340
ORR-4 Report	24	64	0.60	922	\$45.86	\$42,265
Estimated Annual Burden and Cost Totals:				1,670	-	\$76,605

Table 6. URM Youth Estimated Annual Burden for Revised Forms after Implementation

Information Collection Title	Total Number of Annual Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ORR-4 Report	0	0	0	0	-	\$0
Estimated Annual Burden and Cost Totals:				0	-	\$0

Table 7. State/Replacement Designee Agencies Summary Annualized Burden Estimates

Note that this table is provided to explain data entry in OMB's submission system, ROCIS. This provides annualized numbers based on the sum of all data collection activities over three years (for both implementation in Table 1 and post implementation in Table 4), divided by three.

Information Collection Title	Annual Respondents	Annual Number of Responses Per Respondent	Estimated Time Per Response	Annual Burden Hours
ORR-3 Report	16	123.0	0.22	429.6
ORR-4 Report	16	93.3	0.33	490.7
Total				920.3

Table 8. URM Provider Agencies Summary Annualized Burden Estimates

Note that this table is provided to explain data entry in OMB's submission system, ROCIS. This provides annualized numbers based on the sum of all data collection activities over three years (for both implementation in Table 2 and post implementation in Table 5), divided by three.

Information Collection Title	Annual Respondents	Annual Number of Responses Per Respondent	Estimated Time Per Response	Annual Burden Hours
ORR-3 Report	24	82.0	0.43	859.2
ORR-4 Report	24	60.7	0.72	1046.4
Total				1,905.6

Table 9. URM Youth Summary Annualized Burden Estimates

Note that this table is provided to explain data entry in OMB's submission system, ROCIS. This provides annualized numbers based on the sum of all data collection activities over three years (for both implementation in Table 3 and post implementation in Table 6), divided by three.

Information Collection Title	Annual Respondents	Annual Number of Responses Per Respondent	Estimated Time Per Response	Annual Burden Hours
ORR-4 Report	344	1	0.50	172
Total				172

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

The cost to the Federal Government includes one contractor staff reviewing and approving the collected information; the contractor is comparable to the GS-12 level in the Federal

government. The 2026 General Schedule (GS) Locality Pay Table annual rate for a GS-12 in Washington, DC is \$102,415. Therefore, the estimate of annualized cost to the Federal Government to review and approve the collected information is \$102,415.

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB.pdf>

15. Explanation for Program Changes or Adjustments

The proposed revisions to the forms include multiple changes to reduce burden, including:

- Multiple ORR-4 follow-up outcome reports have been replaced with a single ORR-4 termination outcome report.
- Outcome reporting now relies on the provider's professional assessment instead of direct report from youth.
- Select sub-types of ORR-3 reports were eliminated.
- Unclear questions and responses have been replaced or streamlined.
- Unnecessary or duplicative questions have been removed.
- Supplemental report instructions were streamlined, and more instruction was integrated into the forms directly to improve data quality and reduce the need for technical assistance.

Proposed revisions are expected to reduce the average time to complete the ORR-3 form from 0.50 hours to 0.40 hours for provider agency respondents and the average time to review the ORR-3 form from 0.25 hours to 0.20 hours for state/replacement designee respondents. Proposed revisions are expected to reduce the average time to complete the ORR-4 form from 1.0 hour to 0.60 hours for provider agency respondents and the average time to review the ORR-4 form from 0.50 hours to 0.25 hours for state/replacement designee respondents. Youth will no longer be involved in completing the ORR-4 report so average time for youth respondents will go from 0.50 hours to 0 hours.

The number of annual respondents from state/replacement designee agencies has increased from 15 to 16.

The number of reports anticipated annually has been adjusted slightly. The number of reports annually is influenced by the number of youth entering the URM Program. The number of youth entering fluctuates from one year to the next and ORR has seen an increase in new enrollments in recent years. Therefore, ORR anticipates an increase in reports. However, ORR has offset this by replacing multiple ORR-4 follow-up reports with a single termination outcome report and by eliminating select sub-types of ORR-3 reports. Combined, this will result in less frequent reports needed for each youth.

Once all adjustments are taken into consideration and once the revisions are implemented, the revisions will result in a 41% total decrease in burden compared to the previously approved information collection.

16. Plans for Tabulation and Publication and Project Time Schedule

ORR staff review the collected information per the required report submission due dates. Annually ORR reconciles the data to report the location and status of unaccompanied refugee children and youth served by the URM Program in its Annual Report to Congress.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable; ORR plans to display the expiration date of clearance as set by OMB.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.