Unaccompanied Alien Children Sponsor Application Packet

OMB Information Collection Request
0970 - 0278

Supporting Statement Part A – Justification

August 2025; Updated January 2026; Updated October 2026

Type of Request: Emergency Review

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

Summary

The Administration for Children and Families (ACF) requests emergency review and approval of this information collection by the Office of Management and Budget (OMB), as authorized under 5 CFR 1320.13. The proposed revisions to the Authorization for Release of Information (Form SAP-2) and Sponsor Application (Form SAP-3) align the PDF and digital sponsor applications used by the Office of Refugee Resettlement (ORR). Under the October 30, 2026, court order in *Angelica S. v. HHS*, ORR must make the OMB-approved PDF application available as the exclusive sponsorship application if OMB has not approved the online application by November 30, 2026.

The information collected is essential to the mission of the agency. Children's safety and well-being are central to the sponsorship process. ORR must obtain sufficient information to evaluate prospective sponsors, assess household conditions, identify potential safety concerns, and support safe and timely placement decisions. The revised forms organize this information and related conditional follow-up questions to support consistent collection and review throughout the sponsorship process.

The use of normal PRA clearance procedures is reasonably likely to delay approval beyond November 30, 2026, and disrupt information collection by requiring ORR to transition to exclusive use of the approved PDF application. This transition will likely substantially increase manual processing of sponsor applications by Federal staff, draw out the sponsorship process by requiring Federal staff to read out and have sponsors respond to lengthy interviews through *Sponsor Assessment* questions, increase records management burden, and could compromise the security of significant sensitive information of sponsors, their households, and unaccompanied alien children. Operationally, such a transition would result in a significant delay for sponsor assessments and release and unification of unaccompanied alien children with their vetted family member. ACF therefore requests emergency approval by November 3, 2026, to support continued use of the online application, avoid processing delays, and maintain essential safeguards for children throughout the sponsorship and release process.

1. Circumstances Making the Collection of Information Necessary

ORR's UAC Bureau provides care and custody for unaccompanied alien children until they can be safely released to a sponsor, repatriated to their home country, or obtain legal status. ORR funds residential care provider facilities that provide temporary housing and other services to children in ORR custody. Generally, care provider facilities are State licensed (with the exception of those located in states unwilling to consider them for licensure and temporary emergency or influx facilities) and must meet ORR requirements to ensure a high-level quality of care. Services provided at care provider facilities include, but are not limited to, education, recreation, vocational training, acculturation, nutrition, medical, mental health, legal, and case management.

ORR uses several instruments directly related to the care of unaccompanied alien children and the vetting of sponsors to inform its release decision making. The forms in this information collection allow ORR to achieve compliance with applicable laws, regulations, and other legal requirements related to the assessment of potential sponsors for unaccompanied alien children.

Legal Authorities

- **Homeland Security Act (HSA), 6 U.S.C. 279** – Transferred responsibilities for the care and placement of unaccompanied alien children from the Commissioner of the former Immigration and Naturalization Service to the Director of ORR.
- **William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA), 8 U.S.C. 1232** – Creates requirements for the placement, services, and discharge of unaccompanied alien children in federal custody. The TVPRA directs ORR to:

- Create policies to ensure unaccompanied children are protected from traffickers and others seeking to victimize them or otherwise engage them in criminal, harmful, or exploitative activity
- Make a determination that the proposed custodian is capable of providing for the child's physical and mental well-being, which will at minimum include verification of the custodian's identity and relationship to the child, if any, as well as an independent finding that the individual has not engaged in any activity that would indicate a potential risk to the child

- **Unaccompanied Alien Children Program Foundational Rule, 45 CFR Part 410** – Establishes a uniform set of standards and procedures concerning the placement, care, and services provided to unaccompanied alien children in ORR care that is consistent with ORR's statutory duties and implements minimum standards for care of unaccompanied alien children.
  - 410.1202(a) states that potential sponsors shall complete a sponsor application package and 410.1203(c) sets forth the requirements in the Sponsor Care Agreement.
  - 410.1202(b) directs ORR to conduct a suitability assessment to determine whether the potential sponsor is capable of providing for child's physical and mental well-being. It also sets forth the minimum requirements for the assessment.
  - 410.1202(c) states that ORR may require an investigation of the sponsor's living conditions, evidence of the sponsor's ability to support the child, and interviews with household members. It also requires ORR to conduct criminal records checks on sponsors.
  - 410.1202(d) requires ORR to assess the potential sponsor's relationship to the child and child's family.
  - 410.1202(f) requires ORR to evaluate the child's functioning and if there are any risks such as if the child was a victim of sex or labor trafficking, has history of criminal involvement, behavioral issues, violence, individualized needs, substance use, or parenting or pregnant children.
  - 410.1202(g) requires ORR to evaluate any potential risks posed by the sponsor such as criminal background, substance use or history of abuse or neglect, physical home environment, and/or other child welfare concerns.
- ***Ms. L* Settlement Agreement, No. 18-CV000428 (S.D. Cal. 2023)** – Establishes requirements for continued reunification of families under a streamlined process, prohibits separations except in limited circumstances, and provides certain non-monetary support to class members.
- ***Angelica S. v HHS,* Case No. 1:25-cv-01405 (D.C. 2025) –** Concerns the advance notice of changes to sponsor vetting requirement, with a particular focus on the identity document and proof of income requirements.
- **One Big Beautiful Bill Act, Pub. L. 119-21** – Establishes requirements around the vetting of potential sponsors for unaccompanied alien children, including requirements to collect certain information from potential sponsors and adult residents of their household (§ 87001(b)(1)).

Background Checks

The former INS performed investigative background checks on the potential sponsor requesting release of an unaccompanied alien child during the sponsorship review process. During the transition period, DHS performed these checks on these sponsors. As of August 2, 2004, DHS ceased its performance of background checks on sponsors and the physical release from custody.[1]

ORR conducts public records checks, sex offender registry checks, and fingerprint-based background

[1] See Immigrations and Customs Enforcement Memo, Dated July 29, 2004

checks on all potential sponsors, adult household members, and adult caregivers. ORR also sends information to other agencies and entities, such as the Federal Bureau of Investigation (FBI), to conduct parts of the fingerprint-based background checks in ORR's suitability process. ORR retains primary responsibility for conducting suitability determinations for sponsors and, as appropriate, adult members of their household and adult caregivers. ORR coordinates and works with its federal partners, including the FBI, in this effort.

In June 2018, DHS resumed performing some aspects of background checks for those individuals that ORR requires fingerprints from, pursuant to a joint Memorandum of Agreement signed by ORR and DHS in April 2018 (MOA). ORR subsequently issued four operational directives (December 2018, March 2019, and two in June 2019) that reduced the number of individuals requiring fingerprint checks and discontinued using DHS ICE to obtain immigration status. These operational directives were subsequently incorporated into the ORR Policy Guide. In March 2021, the 2018 MOA was terminated and information sharing between DHS and ORR reverted to the previous MOA.

2. Purpose and Use of the Information Collection

The purpose of the forms included in this information collection is to allow ORR to achieve compliance with applicable laws, regulations, and other legal requirements related to the assessment of potential sponsors for unaccompanied alien children. Information specific to each form follows.

- **Authorization for Release of Information (Form SAP-2):** This instrument collects respondents' written consent to background investigations with Federal, state or local law enforcement and/or child welfare agencies, and information to allow ORR to make a determination of whether the child will be safe in the custody of the potential sponsor, as well as other adult household members. After the information is collected, it may be sent electronically to HHS/Program Support Center (PSC) for review and processing. The expected respondents of this instrument are potential sponsors, adult household members, and adult caregivers. This form is available as a PDF and as part of a web-based application.
- **Sponsor Application (Form SAP-3):** This instrument collects information related to the potential sponsor's ability to provide for the child's mental and physical well-being. ORR uses the information collected to determine the suitability of a potential sponsor as a custodian of a child. After the information is collected, it is transmitted electronically to the ORR official responsible for approving the release. The expected respondents of this form are potential sponsors. This form is available as a PDF and as part of a web-based application.
- **Fingerprinting Instructions (Form SAP-5):** This instrument informs potential sponsors, adult household members, and adult caregivers of the steps they must take to be fingerprinted. Fingerprints are collected electronically at grantee or contractor-operated digital fingerprinting sites or submitted via mail using FBI fingerprint cards (form FD-258, OMB Ctrl. No. 1110-0046). The expected respondents of this instrument are potential sponsors, adult household members, and adult caregivers.
- **Letter of Designation for Care of a Child (Form SAP-6):** This instrument is filed by an unaccompanied alien child's parent(s) or legal guardian(s) to specify a potential sponsor to whom they wish to grant caregiving authority for their child. The form is optional (not required for release) but helps non-parent sponsors access community resources or answer questions from government authorities about the nature of their relationship with a child in their care.
- **Affidavit of Financial Support (Form SAP-8):** This instrument may be used by sponsors to fulfill the proof of income requirement in Form SAP-3. The instrument is used as evidence that the sponsor receives financial support from another individual, thereby demonstrating that there are sufficient financial resources to provide for the physical and mental well-being of the child. The expected respondents of this form are individuals financially supporting the sponsor and

sponsors.

- **Sponsor Application for *Ms. L* Separation Cases (Form SAP-9):** This form is a shorter version of the *Sponsor Application* (Form SAP-3) that is used as part of the streamlined reunification process required under the Ms. L Settlement Agreement. The form mostly collects the same information about the sponsor as Form SAP-3, except that fields asking for information about household members or alternate caregivers are not included. The expected respondents of this form are Ms. L class members (generally, parents and legal guardians who were separated from their child when taken into custody by the Department of Homeland Security for a reason that is not permissible under the Settlement).
- **DNA Testing Instructions (Form SAP-10)** – This instrument informs potential sponsors of ORR's DNA testing requirement. ORR requires DNA testing to support proof of relationship between the potential sponsor and the child when the sponsor purports to be biologically related to the child. ORR requires DNA results that confirm biological parentage, biological grand-parentage, avuncular relationship (when an uncle or aunt is a full sibling to a parent), or siblingship (full or half), to establish biological relationship with the child. The expected respondents of this instrument are potential sponsors.

The instruments are available in English and Spanish. English is the official language and authoritative version of all federal information.

Information collected from potential sponsors, adult household members, and adult caregivers using these instruments may be shared with HHS' contractors; grantees; Federal, state or local law enforcement and/or child welfare agencies; and federal partners, including FBI and DHS, for the purpose of conducting background checks to determine the potential sponsor's and their home's suitability, and as otherwise permitted under the Privacy Act.

In addition to the regulations mentioned in the Legal Authority Section above, please also see UAC Policy Guide Section 2.2.3 The Sponsor Application, Section 2.2.4 Required Documents for Submission with the Sponsor Application, Section 2.10.4 *Ms. L* Reunification Process, Section 2.5.1 Background Check Requirements for related sub-regulatory guidance.

3. Use of Improved Information Technology and Burden Reduction

ORR developed a web-based application that includes the *Authorization for Release of Information* (Form SAP-2) and *Sponsor Application* (Form SAP-3) in April 2023. Since access to adequate information technology cannot be assumed for all individuals completing these forms, ORR also maintains fillable PDF versions. The PDF versions allow individuals who have access to computers to complete and file the form electronically, while also allowing the option to complete and file the forms by hand.

To the extent possible, biometric information is collected electronically and, in all cases, it is converted to an electronic format for transmission to federal partners. In addition, mobile fingerprint scanning devices will be used to take prints for subsequent fingerprint checks that are done after initial fingerprint checks are performed.

This emergency review request will align the PDF Forms SAP-2 and SAP-3 with the digital sponsor application. As planned, ORR is also incorporating relevant questions from other OMB-approved PDF forms that pertain to the sponsor application process.

4. Efforts to Identify Duplication and Use of Similar Information

The information being collected by these instruments are not obtainable from other available sources.

5. Impact on Small Businesses or Other Small Entities

The proposed information collections will not burden or impact small businesses.

6. Consequences of Collecting the Information Less Frequently

Not having the information provided through these instruments would impede ORR from performing its charged duty of making care and placement determinations for unaccompanied alien children in its custody. In order to make a determination regarding the suitability of a potential sponsor, ORR needs to collect the information requested in these instruments. The instruments are necessary for the continuous and comprehensive function of the sponsorship review process for releasing children from ORR custody.

Most potential sponsors only sponsor one child, but some may apply to sponsor multiple children at the same time (e.g., sibling groups). These instruments are collected once per sponsorship attempt, which includes attempts to sponsor multiple children at the same time. In the event that a child transfers to another care facility, the new care provider facility would have access to the file. In some cases, the care provider facility conducts concurrent planning and investigates more than one potential sponsor per child in order to meet the goal of releasing a child to a sponsor in a timely and safe manner. In those cases, each potential sponsor would complete the Sponsor Application Packet. Though exact figures are unavailable, overwhelmingly most potential sponsors only apply to sponsor a child(ren) one time. Therefore, most potential sponsors are completing and signing the forms only once.

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

None of the characteristics outlined in 5 CFR 1320.5(d)(2) apply to the instruments in this collection.

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 expedited OMB review of this information collection activity. This notice alerted the public to a request for emergency approval for six months of data collection and provided a sixty-day comment period related to the full request that will be submitted to continue data collection beyond six months. A full request will document any comments received and how ACF has considered the comments.

9. Explanation of Any Payment or Gift to Respondents

No provision or gift to the respondent 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. 552a. ORR's system of records notice, titled 09-80-0321 ORR Unaccompanied Children Bureau Administrative Program Records, was published on September 28, 2026, at 91 FR 61234.

A Privacy Act statement describing the authority for collecting the information, the principal uses, the routine uses that may be made of the information, and the effect of not providing all or some of the requested information, is provided to potential sponsors and, as appropriate, adult members of their

households and adult caregivers. Under published routine uses, information may be shared with federal partners, including FBI, where it will be managed and used in accordance with their policies.

Biographic Information – Official copies of the information collections reside at ORR grantee facilities and electronic copies are circulated between the facilities and ORR offices. The completed forms are stored in a secure database that requires two-factor authentication for all users.

Biometric Information – Fingerprints collected by ORR are used specifically for background check purposes utilizing Federal databases. DNA collected is used specifically to confirm a biological relationship between the potential sponsor and the child. DNA is collected by the ORR contractor performing the DNA tests and destroyed after confirmation of results. ORR does not receive or store biological material.

11. Justification for Sensitive Questions

The *Sponsor Application* asks potential sponsors whether individuals in their households have contagious medical conditions, whether the minor has any health conditions, and whether they or any individual in their household have criminal history. This information is necessary to ensure children received appropriate services while residing in ORR custody and ensure children are released into a safe environment.

ORR also collects the fingerprints of the potential sponsor, adults in the potential sponsor's household, and adult caregivers. ORR informs the potential sponsor that this information is necessary for conducting background checks and for making a suitability determination.

In addition, ORR conducts DNA testing of potential sponsors when they purport to have a biological relationship with the child. ORR informs potential sponsors that this information is necessary to confirm the relationship and for making a suitability determination.

The potential sponsor signs the *Sponsor Application*. Individuals from whom ORR collects fingerprints and DNA provide consent by signing the *Authorization for Release of Information*.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours and Opportunity Costs for Respondents

Estimates used to calculate respondent burden are based on the following factors:

- Each potential sponsor must complete the *Sponsor Application*.
- The potential sponsor, their adult household members, and adult caregivers complete the *Authorization for Release of Information* and have their fingerprints collected. ORR estimates there is an average of three adult household members and one adult caregiver per sponsor.
- The *Letter of Designation* is completed by parents and legal guardians when applicable.
- DNA is collected from sponsors claiming to have a biological relationship with the child (parent, grandparent, aunt or uncle who is a full sibling to a parent, siblings).
- Applications for approximately 165 *Ms. L* class members are expected to be processed per year.
- ORR estimates approximately 35% sponsors will submit an *Affidavit of Financial Suppor*t.
- Estimates for the number of respondents are drawn from data in the ORR database.
- Most respondents only apply to sponsor a child(ren) once.

- The average burden hours per response are drawn from observed completion times and include the time it takes the respondent to listen to their assigned unification specialist explain the instrument, ask follow-up questions, gather the required information and enter it into the instrument, gather required supporting documents, submit biometric information, and get documents notarized, as applicable. The estimate also takes the following factors into account:
    - Travel may be necessary to obtain identity documents or notarize documents, as applicable. Travel is also required for respondents who are required to submit fingerprints and DNA.
    - Respondents will need to engage third parties to obtain all required information and documents. Third parties may include the respondent's household members, family, employer, accountant or tax preparer, bank, landlord, health insurance provider, notary, consulate, and certain Federal, State, or local government agencies.
- ORR assumes most respondents make minimum wage. The Federal minimum wage rate was multiplied by two to account for fringe benefits and overhead – $7.25 * 2 = $14.50

Instrument Title	**Annual Total Number of Respondents**	**Annual Total Number of Responses per Respondent**	**Average Burden Hours per Response**	**Annual Total Burden Hours**	**Average Hourly Wage**	**Total Annual Cost**
Authorization for Release of Information (Form SAP-2)	183,588	1	0.50	91,794	$14.50	$1,331,013.00
Family Reunification Application (Form SAP-3)	76,569	1	1.50	114,854	$14.50	$1,665,383.00
Fingerprinting Instructions (Form SAP-5) - Initial Fingerprinting	183,588	1	1.25	229,485	$14.50	$3,327,532.50
Fingerprinting Instructions (Form SAP-5) - Mobile Fingerprinting	76,569	2	0.50	76,569	$14.50	$1,110,250.50
Letter of Designation for Care of Child (Form SAP-6)	19,202	1	0.75	14,401	$14.50	$208,814.50
Affidavit of Financial Support (SAP-8)	26,799	1	1.00	26,799	$14.50	$388,585.50
Sponsor Application for Ms. L Separation Cases (Form SAP-9)	165	1	1.00	165	$14.50	$2,392.50
DNA Testing Instructions (Form SAP-10)	54,252	1	1.00	54,252	$14.50	$786,654.00
			Estimated Annual Burden Hours Total:	**608,319**	**Estimated Annual Cost Total:**	**$8,820,625.50**

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

Respondents and record keepers will not incur any direct monetary costs, other than their time, in the completion of these instruments.

14. Annualized Cost to the Federal Government

Annualized Cost for Federal Staff

The annualized cost estimate for each of these instruments considers the time of a GS-12 Step 1 federal staff member in the Washington, DC locality to explain the instruments to the potential sponsor and coordinate the collection and the subsequent transmission of the instruments back to ORR. Federal staff will also assist the potential sponsor in setting up a fingerprinting appointment and coordinate DNA testing, when applicable. Federal staff review all information provided by potential sponsors in the instruments to assess suitability to care for the child.

The hourly rate was multiplied by two to account for fringe benefits and overhead – $43.17 * 2 = $86.34

No additional costs will be incurred by the federal government for developing computer systems or storing the instruments as those systems are already in place.

Instrument Title	Annual Total Number of Federal Staff	Annual Total Number of Responses per Federal Staff	Average Burden Hours per Response	Annual Total Burden Hours	Average Hourly Wage	Total Annual Cost
Authorization for Release of Information (Form SAP-2)	110	1,669	0.25	45,898	$97.18	$4,460,367.64
Family Reunification Application (Form SAP-3)	110	696	1.00	76,560	$97.18	$7,440,100.80
Fingerprinting Instructions (Form SAP-5) - Initial Fingerprinting	110	1,669	0.75	137,693	$97.18	$13,381,005.74
Fingerprinting Instructions (Form SAP-5) - Mobile Fingerprinting	110	696	0.50	38,280	$97.18	$3,720,050.40
Letter of Designation for Care of Child (Form SAP-6)	110	175	0.50	9,625	$97.18	$935,357.50
Affidavit of Financial Support (SAP-8)	110	244	0.50	13,420	$97.18	$1,304,155.60
Sponsor Application for Ms. L Separation Cases (Form SAP-9)	110	2	0.75	165	$97.18	$16,034.70
DNA Testing Instructions (Form SAP-10)	110	493	0.75	40,673	$97.18	$3,952,602.14
			Estimated	**38,280**	**Estimated**	**$3,720,050.40**

	Annual Burden Hours Total:		**Annual Cost Total:**	

Annualized Printing Cost

This estimate assumes that record keepers print and mail instruments to approximately 25% of respondents at a cost of $0.05 per page.

Instrument Title	Annual Total Number of Respondents	Annual Total Number of Responses per Respondent	Pages per Instrument	Total Pages	Cost per Page	Total Annual Printing Cost
Authorization for Release of Information (Form SAP-2)	183,588	1	4	734,352	$0.05	$36,717.60
Family Reunification Application (Form SAP-3)	76,569	1	10	765,690	$0.05	$38,284.50
Fingerprinting Instructions (Form SAP-5) - Initial Fingerprinting	183,588	1	1	183,588	$0.05	$9,179.40
Letter of Designation for Care of Child (Form SAP-6)	19,202	1	2	38,403	$0.05	$1,920.15
Affidavit of Financial Support (SAP-8)	26,799	1	5	133,996	$0.05	$6,699.80
Sponsor Application for Ms. L Separation Cases (Form SAP-9)	165	1	7	1,155	$0.05	$57.75
DNA Testing Instructions (Form SAP-10)	54,252	1	1	54,252	$0.05	$2,712.60
			Estimated Annual Burden Hours Total:	**1,911,436**	**Estimated Annual Cost Total:**	**$95,571.80**

15. Explanation for Program Changes or Adjustments

New Instruments

- **Affidavit of Financial Support (Form SAP-8):** This instrument may be used by sponsors to fulfill the proof of income requirement in Form SAP-3. The instrument is used as evidence that the sponsor receives financial support from another individual, thereby demonstrating that there are sufficient financial resources to provide for the physical and mental well-being of the child. The expected respondents of this form are individuals financially supporting the sponsor and potential sponsors.
- **Sponsor Application for Ms. L Separation Cases (Form SAP-9)**: This instrument is a shorter version of the Sponsor Application (Form SAP-3) that is used as part of the streamlined reunification process required under the *Ms. L* Settlement Agreement. The form

mostly collects the same information about the sponsor as Form SAP-3, except that fields asking for information about household members or alternate caregivers are not included. The expected respondents of this form are *Ms. L* class members (generally, parents and legal guardians who were separated from their child when taken into custody by the Department of Homeland Security for a reason that is not permissible under the Settlement).

- **DNA Testing Instructions (Form SAP-10):** This instrument informs potential sponsors of ORR's DNA testing requirement. ORR requires DNA testing to support proof of relationship between the potential sponsor and the child when the sponsor purports to be biologically related to the child. ORR requires DNA results that confirm biological parentage, biological grand-parentage, avuncular relationship (when an uncle or aunt is a full sibling to a parent), or siblingship (full or half), to establish biological relationship with the child. The expected respondents of this instrument are potential sponsors.

Revisions to Existing Instruments

- **All Instruments:**
  - Replace "unaccompanied child" or "UC" with "unaccompanied alien child" or "UAC"
  - Replace "case manager" with "Federal Field Specialist"
- **Authorization for Release of Information (Form SAP-2):**
  - Remove "in black ink" from the instruction at the top of the form to reflect that ORR accepts both wet and electronic signatures for this form
  - Add a column in the "Other name you have used" table where sponsor applicants can indicate whether they are still using any of the other names they list
  - Add a field to collect either a Social Security Number or Tax Identification Number (if applicable) as required by Pub. L. 119-21 § 87001(b)(1)(B)
  - Added fields for phone number and email address so that respondents who are not the sponsor may enter their information directly
  - Revise instructions in the address section to require addresses from age 18 to present to align with state/local sex offender registry check requirements
  - Add instructions on what the respondent should do if they do not remember or only partially remember all their past addresses, along with a textbox to provide an explanation if they are unable to provide a complete address history
  - Update the headers in the address table to be more user friendly for respondents that have past addresses in other countries
  - Add an attestation that the respondent understands the penalties for knowingly and willfully making false statement under 18 U.S.C. § 1001
  - Add an attestation the sponsor specialist must complete if they have assisted the sponsor applicant with entering information into the form
- **Sponsor Application (Form SAP-3):**
  - Remove the "How to complete this application" and Frequently Asked Questions" sections. This information will be moved into a separate document.
  - Reword the field "Your email address or fax number" to read "Your email address"
  - Add an attestation that the respondent understands the penalties for knowingly and willfully making false statement under 18 U.S.C. § 1001
  - Add columns to the household member table to collect contact information (phone and email) as required by Pub. L. 119-21 § 87001 (b)(1)(F)

- Add yes/no radio buttons for the questions in the "Health Information" section
- Add question to "Criminal History" section that asks whether the respondent has ever committed a crime for which they were not arrested
- Add an attestation the sponsor specialist must complete if they have assisted the sponsor applicant with entering information into the form
- Revise the "Supporting Documents" section to make clear that legible full color copies, digital scans, high-resolution digital photos, and original versions may be submitted for each type of document (with the exception of proof of address which required original versions only)
- Revise the instructions for proof of identity in the "Supporting Documents" section as follows:
  - Clarify that original versions are accepted
  - Clarify that expired documents will no longer be accepted
  - Update the list of acceptable documents to algin with recent policy changes
- Revise the instructions for proof of address in the "Supporting Documents" section as follows:
  - Clarify that an original version of the documentation must be provided
  - Update the list of acceptable documents to algin with recent policy changes
- Add a requirement to provide proof of income documentation to algin with recent policy changes
- Modify the list of acceptable proof of relationship documents to algin with recent policy changes
- Add a textbox where the sponsor can explain why they are unable to meet any of the supporting documentation requirements (if appliable)

- **Letter of Designation for Care of a Child (Form SAP-6):**
  - Add an attestation that the respondent understands the penalties for knowingly and willfully making false statement under 18 U.S.C. § 1001
  - Add an attestation the sponsor specialist must complete if they have assisted the sponsor applicant with entering information into the form

Revisions to Burden Estimates for Existing Instruments

Burden estimates for existing instruments were updates to reflect the following changes:

- A decrease in the number of children in ORR care and corresponding decrease in the number of individuals applying to sponsor a child
- An increase in the number of individuals required to undergo fingerprint checks and the frequency of fingerprint checks for sponsors. All sponsors, household members, and adult caregivers will be required to undergo a fingerprint check. ORR federal staff will take the sponsor's prints using a mobile device two additional times during the vetting process – during the home study and just prior to physically releasing the child to the sponsor.
- ORR will be moving sponsor vetting responsibilities from grantee/contractor staff to federal staff.

The specific changes to burden are as follows:

- **Authorization for Release of Information (Form SAP-2):** The annual number of respondents increased from 81,532 to 183,588; the annual number of record keepers decreased from 235 to 0.

- **Sponsor Application (Form SAP-3):** The annual number of respondents decreased from 122,950 to 76,569; the annual number of record keepers decreased from 235 to 0; the average burden hours per response increased from 1 hour to 1.5 hours.
- **Fingerprinting Instructions (Form SAP-5):** The annual number of respondents increased from 81,532 to 183,588; the annual number of record keepers decreased from 235 to 0; the annual number of responses per respondent increased from 1 to 3 (for sponsors respondents only) with an average burden hours per response of 0.5 for the two additional responses (the average burden hours per response of 1.25 hours remains the same for the sponsor's initial response).
- **Letter of Designation for Care of a Child (Form SAP-6):** The annual number of respondents decreased from 41,181 to 19,202; the annual number of record keepers decreased from 235 to 0.

REVISIONS TO EXISTING FORMS (Version 20)

ORR plans to make the following revisions to various sections of existing forms in this information collection:

1. All instruments

- Reordered questions, where possible, to align with the information groupings in the digital sponsor application.
- Incorporated selected information already requested through the Sponsor Assessment (Form S-5), Home Study Assessment (S-6), and Affidavit of Support (Form SAP-8) into SAP-3. Organized related questions and conditional follow-up fields within the application to simplify completion for sponsors and support consistent collection and review of information by ORR. These revisions include both previously requested information and additional detail, as described below.
- Digital versions provide pre-populated dropdown options of the listings found in the paper copies.

2. Authorization for Release of Information (Form SAP-2)

Background

- Replaced "Information Required for a Background Check" with "About the child (children)" and added an "About you, the Sponsor" heading.
- Added a "Child's Country of Origin" column and separated the child's name into first and last name fields. S-5 already records the child's first and last names separately and collects related information under "Country of Birth."
- Replaced the sponsor's combined name field with separate first and last name fields and removed the instruction to include a middle name. S-5 already records the sponsor's first and last names separately.
- Moved the existing date-of-birth, citizenship, and Social Security number/tax identification number fields earlier in the form.
- Removed "County" and "State" from the sponsor's place-of-birth information, retaining city and country. Added instructions to copy birthplace information from the sponsor's birth certificate.
- Updated "TIN" to "ITIN."
- Expanded the citizenship section to accommodate up to three countries of citizenship.

- Updated “Other names you have used” to “Your previously used name(s)” and instructed respondents to leave the section blank if they have not used other names.

- **Contact Information** Grouped existing phone and email fields under “Your contact information,” changed “Primary Phone” to “Mobile phone number,” and labeled the secondary phone number and email address as optional.

Address Information

- Grouped existing phone and email fields under “Your contact information,” changed “Primary Phone” to “Mobile phone number,” and labeled the secondary phone number and email address as optional.

Address Information

- Added a separate “Your current address” block with an address start month and year. Address and start-date information was previously collected through the address-history table. S-5 also records the sponsor’s current address and length of residence.
- Added a Yes/No question asking whether the sponsor currently has a fixed home or physical address, with conditional prompts to provide the address or explain living arrangements, such as moving between homes or having no place to stay.
- Used international address components in the separate current-address block, consistent with the city/locality, state/province, postal-code, and country information already requested in the address-history table.
- Renamed “Addresses” to “Your past addresses” and updated the instructions to expressly include addresses in the sponsor’s home country and direct sponsors not to leave gaps in their address timeline.
- Updated instructions to direct sponsors who cannot recall a street address to enter “Unable to Recall Address” while still providing the city, state, or country and applicable dates.
- Directed sponsors who lacked a fixed address to enter “No Fixed Address,” provide the country and dates, and explain their living arrangements. Replaced the general incomplete-address-history explanation prompt with a prompt specifically addressing periods without a fixed home.

3. Sponsor Application (Form SAP-3)

Sponsor Information

- Updated the section heading from “About You—the Sponsor—and the Child(ren)” to “Sponsor Information” to Updated “About you—the sponsor—and the child(ren)” to “About you, the sponsor.”
- Added a “Your relationship to the child (children)” heading to organize the existing child-name and relationship questions.
- Removed the questions about previously used names and country of origin, along with the sponsor’s phone and email fields. SAP-2 retains previously used names, place-of-birth information, and sponsor contact information.

Sponsor's Income and Employment Information

- Moved "Financial Information," formerly Item 13, earlier in the application and renamed it "Sponsor's Income and Employment Information." Replaced the broad narrative financial-support prompt with structured questions and conditional fields.
- Added questions about court-ordered child support paid, employment status, and ability to meet expenses. These topics are already covered in S-5. SAP-8 also requests employment status.
- Added a specific question about receiving child support, providing additional detail within the income-source information previously requested generally through Item 13 and SAP-8.
- Added a conditional follow-up asking how sponsors earn money if they do not have a job. This provides a specific prompt for income information previously requested through Item 13 and SAP-8.
- Added conditional "My Job" fields for employment type/position title/job title; average weekly income and annual income; employer name, street address, city, state/territory, country, postal code, and telephone number; employment start month and year; length of employment; average weekly hours; days worked using weekday checkboxes; and comments.
- Incorporated information already requested through S-5 concerning annual income and employer name, address, city, state, ZIP code, and telephone number. S-5's general work-schedule question is addressed through more specific weekly-hours fields and weekday checkboxes. SAP-8 already requests employment status, occupation, employer name, annual employment income, and related comments. Weekly income was previously requested through Item 13. Employer country, employment start date, and length of employment add explicit detail.
- Added a question about financial support from household members, a partner, an alternative caregiver, or a spouse, with conditional "My Supporter's Job" fields requesting the same employment information. These prompts organize support from others previously requested through Item 13 and SAP-8. SAP-8 already requests the financial supporter's employment status, occupation, employer name, annual income, monthly support contribution, and related comments; SAP-3 adds more detailed supporter-employment fields.
- Added fields for other income sources; average monthly food, rent, clothing, and school-needs expenses; total monthly expenses; total monthly income; and total annual income. Other income sources and total annual income are already requested through SAP-8. The itemized expenses and monthly totals provide additional reporting detail.

Prior Sponsorship Information

- Added a dedicated section to align with the digital application and incorporate prior-sponsorship information already requested through S-5.
- Added a question about previous sponsorship attempts, with conditional fields for the sponsorship date; the child's UAC Portal ID, A-number, first and last name, date of birth, and sex; and the sponsor's relationship to the child. S-5 already requests previous sponsorship attempts and records the previously sponsored child's name, A-number, date of birth, and relationship to the sponsor. SAP-3 separates the combined name field into first and last names.

- Added questions about the previously sponsored child's school enrollment or attendance, receipt of post-release services, and continued residence with the sponsor. S-5 currently requests these topics.
- Added questions about immigration court attendance and the date of the hearing attended, together with wording about case-manager contact within the post-release-services question. S-5 already asks about post-release services and an upcoming court date; SAP-3 requests additional information about actual attendance and case-manager contact.
- Added questions about previous ORR home studies; withdrawn or discontinued sponsorship applications and the reasons; previous sponsorship denials and the reasons; relatives currently in ORR care; and whether a child was previously removed from the sponsor's custody, with an explanation. These topics, including explanations for withdrawal, denial, and custody removal, are currently requested through S-5.

Household Information

- Added a "Household Information" section heading.
- Updated "Who else currently lives at this address?" to "Household members."
- Updated "Household Member Name" to "Household Member First and Last Name." S-5 already records household members' first and last names separately.
- Added a country field and updated the proposed-residence address labels to accommodate addresses outside the United States.
- Added a prompt asking sponsors to explain when the proposed residence differs from their current address.

Health Information

- Moved the existing Health Information section after Household Information without changing the questions.

Criminal History

- Moved the section after Health Information and expanded the existing questions to cover both the sponsor and household members. Changed "a child" to "a minor" in the abuse/neglect/abandonment question.
- Moved and expanded existing Item 15(c) to include household members in the question about crimes or offenses committed, agreed to, solicited, assisted with, or attempted for which the person was not arrested. The original question addressed the sponsor alone.
- Moved incident-detail requests from the Legal Records instructions into conditional follow-up fields for affirmative responses to the criminal-charge/conviction and abuse/neglect/abandonment questions. These fields request the name of the household member(s) involved, incident location and date, explanation, and disposition, such as charges dropped, a fine, imprisonment, or probation. The existing Legal Records instructions already requested incident details. Retained the requirement to submit applicable supporting records.

Adult Who Will Care for the Child(ren) If You Cannot

- Added email and country fields for the alternative caregiver and updated address labels to accommodate addresses outside the United States.
- Updated Item 12(f) to clarify how the alternative caregiver will care for the child if the sponsor becomes unable to do so. This clarifies the existing care-plan question. S-5 also currently requests an alternate adult caregiver plan.

Supporting Documents and Uploads

- Expanded the Proof of Identity heading and instructions to expressly include the sponsor, each adult household member, and the alternative caregiver.
- Organized the identity instructions into "Identification Documents" and "Photo (selfie)" subsections.
- Extended the requirement to provide at least one listed identification document to the alternative caregiver. S-5 already records verification of the alternative caregiver's identity and supporting identity documents.
- Added a request for current, legible, full-color photos of the sponsor, each adult household member, and the alternative caregiver, with each person holding their identification document next to their face.
- Retained the accepted formats for government-issued identification documents—legible, full-color photocopies, digital scans, high-resolution digital photos, or original documents—and the instruction that expired documents will not be accepted.

16. Plans for Tabulation and Publication and Project Time Schedule

ORR does not plan to publish the information provided by the respondents.

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

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.