



Office of the General Counsel

3211 FOURTH STREET NE ■ WASHINGTON DC 20017-1194 ■ 202-541-3300 ■ FAX 202-541-3337

May 20, 2022

Submitted Electronically via infocollection@acf.hhs.gov

Mary B. Jones
Certifying Officer
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street SW
Washington, D.C. 20201

Re: Proposed Information Collection Activity; Family Reunification Packet for Sponsors of Unaccompanied Children, OMB No. 0970-0278, 87 Fed. Reg. 16194 (March 22, 2022)

Dear Ms. Jones:

The United States Conference of Catholic Bishops' Department of Migration and Refugee Services ("USCCB/MRS") appreciates the opportunity to provide public comment and share our gratitude with the Department of Health and Human Services' Office of Refugee Resettlement ("HHS/ORR") regarding the proposed revisions to the above-mentioned information collection activity.

Inspired by Catholic social teaching, USCCB/MRS has operated programs in collaboration with the U.S. government to help protect children from all over the world for 40 years. Since 1994, USCCB/MRS has operated Safe Passages, a program serving migrant children apprehended by the Department of Homeland Security (DHS) and placed in the custody of HHS/ORR. Through cooperative agreements with HHS/ORR, and in partnership with community-based social services agencies, the Safe Passages program provides residential care (*i.e.*, foster care and small-scale shelter placements) to unaccompanied children in HHS/ORR custody, as well as family reunification services (*i.e.*, pre-release placement screening and post-release services for families). Between 2020 and 2021, the USCCB/MRS network served thousands of vulnerable children, including nearly 100 youth in the Unaccompanied Refugee Minors (URM) program, 626 unaccompanied children (UC) in foster care, and over 1,300 UC and their families receiving post-release services.

Through all of this work, the importance of placing children with the appropriate sponsors and keeping families together has been repeatedly demonstrated. In addition, the precise terminology used and scope of information collected throughout the reunification process can have a meaningful impact on those involved and the successful outcome of a case. Therefore, USCCB/MRS is pleased to see the changes proposed to the *Family Reunification Packet for Sponsors of Unaccompanied Children*.

Proposed Changes

In particular, USCCB/MRS commends the proposal to replace the term “minor” with “child” in the *Authorization for Release of Records*, the *Family Reunification Application*, and the *Letter of Designation for Care of Minor*. We believe that this is a small but positive step that recognizes the humanity and dignity of the children awaiting reunification.

Further, we commend and welcome the proposal to no longer require sponsors to provide information on “past and present immigration status” in the *Authorization for Release of Information* and proof of immigration status or U.S. citizenship in the *Family Reunification Application*. Through our work, USCCB/MRS has learned that sponsors are often hesitant to come forward as a potential sponsor if they fear that their information will be shared with immigration enforcement entities. By no longer collecting and using immigration status to determine the eligibility of a sponsor, HHS/ORR is creating an environment for the most appropriate sponsors to feel safe and confident to come forward, regardless of their status, and in the best interests of children.

Suggested Revisions

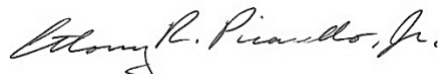
As previously stated, USCCB/MRS is appreciative of the proposed changes and looks forward to seeing the updates forms in rotation. In addition, in our review of the proposed forms, we suggest that the following are reviewed and amended:

- The proposed *Family Reunification Application* form continues to use the term “minor” in the following sections:
 - Sign & Date Your Application (page 7); and
 - Supporting Documents (page 8).
- In the Spanish version of the *Family Reunification Application* and the *Letter of Designation for Care of a Child*, the term “minor” or “*menor*” is still used throughout the forms. This should be edited to reflect the change from “minor” to “child,” or “*niño*.”

Conclusion

Family unity is a cornerstone of the American immigration system. USCCB/MRS recognizes the critical need to ensure the safety and well-being of unaccompanied children by thoroughly vetting sponsors before placing children in their care. We believe that the above-mentioned changes continue to uphold those safeguards, while incorporating changes that take into account the best interests of children. For these reasons and those set forth above, we express sincere thanks to HHS/ORR for the proposed changes to the *Family Reunification Packet* forms.

Respectfully submitted,



Anthony R. Picarello, Jr.
Associate General Secretary and General Counsel
U.S. Conference of Catholic Bishops