



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

From: Casey Family Programs

Date: June 23, 2025

Re: Submission for Office of Management and Budget Review;
Unaccompanied Alien Children Bureau Incident Reporting

OMB #: 0970-0NEW

Thank you for the opportunity to provide comments on the Proposed Information Collection Including Proposed Changes issued by the Office of Refugee Resettlement, Administration for Children and Families at the U.S. Department of Health and Human Services regarding the elevation of serious issues and incidents involving Unaccompanied Children to ensure the documentation, response, and resolution of such incidents occur in ways that protect the interests of children.

Casey Family Programs (Casey) was founded in 1966 and is the nation's largest operating foundation focused on providing and improving – and ultimately preventing the need for – foster care. Casey's perspectives are informed by our own experiences as a direct service provider to families and children as well as our work with child welfare agencies in all 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, and with 19 American Indian Tribal Nations. Casey partners with child welfare systems, policymakers, youth and families, community organizations, national partners, philanthropy, American Indian and Alaska Native tribes, and courts to support practices and policies that increase the safety and success of children and strengthen the resilience of families.

Based on the deep expertise Casey has gained through our work serving the needs of children and families, including those who arrive at the southern border, as well as our decades of work with children, youth, families, and communities across the country, we offer the following comments for your consideration.

Proposed Changes

Among other changes, two fields are being deleted from the Incident Information section of the reporting form:

- Internal Investigation? and
- Results/Findings of Investigation.

Additionally, ORR has added the Office of the Inspector General as an investigatory entity to which ORR should report incidents.

Research and data tell us that sufficient reporting mechanisms and independent and comprehensive oversight are required to ensure the safety, health, and wellbeing of children



and young people in government care. We recognize that in adding the Office of the Inspector General in this capacity tasks this office with the responsibility for conducting investigations into incident reports at ORR facilities. Casey has significant experience in the care and custody of children – particularly in the area of safety – and we are always ready and willing to serve as a resource in this work.

Conclusion

Thank you for allowing us to provide feedback on the proposed information collection. We look forward to continued dialogue with you in this critical area. If you have any questions or require additional information, please contact Christine Calpin, Managing Director – Public Policy (ccalpin@casey.org or 703.963.2175).