

March 4, 2010

To: The Office of Management and Budget  
Attn: Desk Officer for the Administration for Children and Families  
From: The Massachusetts Office for Refugees and Immigrants  
Re: Comments regarding ORR Revisions to the ORR-3 and ORR-4 URM Forms

To whom it may concern:

The following is a list of comments regarding ORR Revisions to the ORR-3 and ORR-4 forms. They were compiled from comments that URM caseworkers submitted during the trial period.

- It took caseworkers approximately 45 minutes per form
- The form is visually chaotic and it is easy to miss required fields
- Many fields are not large enough for appropriate answer (i.e. Alien Number field)
- All State fields are formatted in "Wingdings" font
- All Zip Code fields are formatted to delete the first "0" in the number sequence
- Caseworkers had questions regarding "Service Type" and "Educational Benefits" fields. It appears that it would be helpful to have explanations for these fields.

If you have any questions or need further clarifications, please contact Alyona Nossik, URM Program Coordinator at the Massachusetts Office for Refugees and Immigrants (617-727-7888 ext. 335).



JOHN A. WAGNER  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
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ARNOLD SCHWARZENEGGER  
GOVERNOR

February 4, 2010

Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Attn: Desk Officer for the Administration for Children and Families  
Fax: 202-395-7245

To Whom It May Concern:

The California Department of Social Services (CDSS) is responding to the request for comments regarding the newly revised Unaccompanied Refugee Minor (URM) Placement Report and URM Outcomes Report, ORR-3 and ORR-4 respectively. These reports are used to collect data for the federal URM program, a refugee foster care program administered by the United States Department of Health and Human Services, Office of Refugee Resettlement (ORR).

The CDSS has the overall responsibility for administering the Refugee Resettlement Program in California, including the URM program; and, in that role, we oppose the implementation of the revised ORR reports due to:

- the drastic increase in the amount and complexity of the new data required;
- the additional workload burden this will place on California at a time when our state is faced with reduced staffing and fiscal challenges; and
- adequate time has not been allowed for our state to review the new reports or for ORR to provide an explanation of why these changes are necessary.

Based on these reasons, CDSS requests that the OMB delay the implementation of the revised reports and open a dialogue with state and local stakeholders to provide input on the need for the revisions. Thank you for the opportunity to comment on the federal report revisions. If you have any questions, please contact Ms. Thuan Nguyen, Chief of the Refugee Programs Bureau, at (916) 654-4356 or at [Thuan.Nguyen@dss.ca.gov](mailto:Thuan.Nguyen@dss.ca.gov).

Sincerely,

VENUS GARTH, Chief  
Child Care and Refugee Programs Branch

c: Mr. Eskinder Negash, Director, U.S. ORR