UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANGELICA S., *et al.*, Plaintiffs, v. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, *et al.*, Defendants.	Case No. 1:25-cv-01405-DLF

DEFENDANTS' SUPPLEMENT TO THEIR CROSS-MOTION FOR SUMMARY JUDGMENT

As required by the Minute Order of June 4, 2026, Defendants submit this supplement to their Cross-Motion for Summary Judgment and Opposition to Plaintiffs' Motion for Summary Judgment, ECF No. 71, to address the new Plaintiffs and allegations in Plaintiffs' Second Amended Complaint, ECF No. 104. Like the prior Plaintiffs, the new Plaintiffs lack standing to challenge the Interim Final Rule. Plaintiffs' new factual allegations also show that Plaintiffs are not entitled to relief on their Paperwork Reduction Act ("PRA") claim. Moreover, Defendants remain entitled to summary judgment for the reasons stated in their original cross-motion and reply, ECF Nos. 71, 76.

I. Background

The parties completed briefing on their cross-motions for summary judgment on December 19, 2025. ECF Nos. 58, 71, 73, 76. The Court heard argument on the motions on March 18, 2026. In the June 4, 2026 Minute Order, the Court granted Plaintiffs leave to file their Second Amended Complaint, ECF No. 104, and ordered the parties to file supplements in support of their cross-motions for summary judgment. In the Second Amended Complaint, Plaintiffs add three new named Plaintiffs: Esmeralda C., Lorenzo V., and Brian G. ECF No. 104, ¶¶ 20–22; *see also* ECF No. 105-2 (Declaration of Lorenzo V.); ECF No. 105-3 (Declaration of Esmeralda C.); ECF No. 105-5 (Declaration of Brian G.).

Esmeralda C. entered the custody of the Office of Refugee Resettlement ("ORR") on September 10, 2025, and was admitted with her infant son. Ex. A, June 15, 2026 Declaration of Toby Biswas ("Biswas Decl.") ¶ 4. On September 17, 2025, Esmeralda's mother informed ORR that she was unable to sponsor Esmeralda due to personal safety concerns. *Id.* Esmeralda's mother identified Esmeralda's adult sister as a potential sponsor, and ORR attempted contact with the sister on September 12 and 23 with interpreter assistance. *Id.* On September 23, 2025, after reviewing the responsibilities of sponsorship, Esmeralda's sister declined to move forward with the sponsorship process. *Id.* Esmeralda's mother then identified a family friend as another potential sponsor and that referral was submitted to ORR on October 2, 2025. *Id.* ORR made outreach attempts on October 9 and 17. *Id.* On October 24, 2025, the family friend informed ORR that he would be unable to proceed after considering the responsibilities of sponsoring both Esmeralda and her young child. *Id.* On October 30, 2025, Esmeralda's mother reported there were no additional individuals available or willing to serve as sponsors. *Id.* After discussion with her mother and sister, Esmeralda expressed her desire to move forward with placement in long-term foster care. *Id.*

Lorenzo V. entered ORR custody on September 11, 2025. *Id.* ¶ 3. On September 17, 2025, Lorenzo indicated at a check-in that he had never met his potential sponsor, his brother, before. *Id.* From October through December, ORR repeatedly contacted Lorenzo's brother to discuss the sponsorship application and remind him of outstanding items. *Id.* On January 6, 2026, Lorenzo's brother reported that he is unable to obtain an acceptable form of ID and that his wife who is a

U.S. citizen would proceed instead. *Id.* ORR reminded him that, as an adult household member, he would still be required to provide an ID that would meet ORR's requirements. *Id.* On January 23, 2026, Lorenzo's brother informed ORR that he will be declining to proceed with the sponsorship. *Id.*

On February 26, 2026, ORR contacted Lorenzo's sister-in-law. *Id.* On March 4, 2026, Lorenzo informed ORR that he would like to have his cousin sponsor him instead; Lorenzo's father, however, expressed his desire for Lorenzo's sister-in-law to be Lorenzo's sponsor. *Id.* ORR contacted Lorenzo's sister-in-law on March 4 and 5 since there has been no activity on the sponsorship application. *Id.* ORR followed up again with her on March 11, 12, 13, 18, 19 and received no responses. *Id.* On March 24, 2026, she contacted ORR to state that the sponsorship application had been completed. *Id.* However, ORR responded to her that it was still incomplete and offered technical assistance. *Id.* On April 6, 2026, ORR reached out to Lorenzo's sister-in-law for scheduling her fingerprinting appointment. *Id.* On April 9, 2026, Lorenzo's sister-in-law informed ORR that she was not able to complete her fingerprinting appointment. *Id.* On April 17, 2026, Lorenzo's sister-in-law communicated that she no longer wished to continue with the sponsorship process because of the documentation requirement. *Id.*

On April 20, 2026, ORR contacted Lorenzo's father to identify a new sponsor and he identified Lorenzo's cousin. *Id.* ORR attempted contact that day but was unsuccessful. *Id.* On April 27, 2026, ORR made contact with Lorenzo's cousin to begin initial screening. *Id.* On May 28, 2026, Lorenzo's cousin submitted his proof of address, proof of income, and identification. *Id.* On June 2, 2026, Lorenzo's cousin completed the online sponsorship application. *Id.* The alternate caregiver has submitted her authorization for release of information, and the fingerprints have been completed for both individuals. *Id.* However, a DNA test is pending. *Id.* On June 11, 2026, ORR completed a referral for a home study to be conducted. *Id.*

Brian G. entered ORR custody on May 3, 2025. *Id.* ¶ 5. On May 5, 2025, Brian's cousin submitted a sponsorship application. *Id.* When ORR conducted background checks for Brian's cousin and her four household members, a possible criminal record was found for one of the household members. *Id.* On May 8, 2025, fingerprint appointments were completed for Brian's cousin and her household members, except for one who could not attend. *Id.* On May 13, 2025, Brian's cousin contacted ORR to postpone the fingerprint appointment for the last outstanding household member. *Id.* On May 14, 2025, ORR discovered that the information provided by another household member for background checks did not match up with what was discovered during the checks, prompting further investigation and follow-up. *Id.* On May 17, 2025, ORR informed Brian's cousin that her household members all needed valid IDs as their current forms of ID would not meet the requirements. *Id.* Brian's cousin's household members were still pending their IDs on May 30, 2025 as they were waiting for their immigration statuses to adjust. *Id.* ORR followed up again with Brian's cousin on June 12, 2025 and informed her that the IDs for her household members are still pending. *Id.* Brian's cousin indicated to ORR that she is in the process of submitting an apartment application so that she would move out. *Id.* From June 14 to July 23, 2025, ORR was waiting for Brian's cousin to either move out or provide her household member's identification documents. *Id.* On July 30, 2025, Brian's cousin communicated to ORR that she was now planning to have her parents relocate instead of her so that she can continue on with the sponsorship application. *Id.* From August 1 to 8, 2025, ORR was waiting for the household members to relocate. *Id.* On August 13, 2025, ORR submitted a discretionary home study request to confirm that the household members had truly relocated. *Id.* On August 20, 2025, a home study was conducted with no obvious concerns. *Id.* On August 31, 2025, Brian's case was recommended for release, subject to federal field specialist's approval. *Id.*

Between September and December 2025, several medical issues occurred that slowed down the release process. *Id.* Brian's sponsor's background documents expired on January 28, 2026, and his sponsor's fingerprints expired on February 2, 2026. *Id.* On February 9, 2026, Brian's cousin informed ORR that her parents moved in with her; therefore, there is a change in her household composition. *Id.* On February 11, 2026, Brian's cousin confirmed to ORR that she will complete new additional vetting requirements due to her having new household members. *Id.* On March 2, 2026, Brian's cousin expressed her desire to withdraw from sponsorship. *Id.* On March 19, 2026, Brian decided to transfer to a long-term foster care program. *Id.* On May 13, 2026, Brian mentioned his uncle as a potential sponsor. *Id.* On May 19, 2026, all of Brian's potential sponsors decided not to continue with sponsorship. *Id.*

In the Second Amended Complaint, Plaintiffs also update the allegations as to their PRA argument, which is part of Plaintiffs' Administrative Procedure Act ("APA") claim in Count IV. ECF No. 104, ¶ 200. Plaintiffs acknowledge that ORR received approval from the Office of Management and Budget ("OMB") for a sponsor application form, but Plaintiffs allege that ORR "has not implemented the approved form and continues to require sponsors to complete an unauthorized information collection." ECF No. 104, ¶ 200.

II. Argument

A. Like the prior Plaintiffs, the new Plaintiffs lack standing to challenge the Interim Final Rule.

In the cross-motion for summary judgment, Defendants explained that the Plaintiffs lack standing to challenge the Interim Final Rule because their alleged injuries are not traceable to the

Interim Final Rule. ECF No. 71, at 30–32. The new Plaintiffs also lack standing to challenge the Interim Final Rule because they do not establish traceability and redressability.

Plaintiffs have the burden to prove standing as to each claim and each request for relief. *See Lujan v. Defs. of Wildlife*, 504 U.S. 555, 561 (1992). Whether Plaintiffs can be released from ORR custody depends on the conduct of third-party potential sponsors. "Although standing is not precluded in a case that turns on third-party conduct, it is ordinarily substantially more difficult to establish." *Arpaio v. Obama*, 797 F.3d 11, 20 (D.C. Cir. 2015) (citation modified). The D.C. Circuit requires "substantial evidence of a causal relationship between the government policy and the third-party conduct, leaving little doubt as to causation and the likelihood of redress." *Id.* (citation modified).

Plaintiffs' new declarations do not mention the Interim Final Rule directly. In their declarations, Plaintiffs Lorenzo V. and Brian G. express no concerns about information sharing or about disqualification of sponsors based on immigration status itself (as opposed to possessing identification documents). ECF No. 105-2; ECF No. 105-5. As the Court understands, possessing identification documents that ORR accepts is not necessarily linked to immigration status. ECF No. 71, at 29.

Although Esmeralda C. does mention sharing of information, the evidence falls short of establishing traceability and redressability. Esmeralda C. states that her mother "was also very afraid that ORR would share her information with immigration officers and they would arrest her this time . . . . She knew that things had changed a lot this past year." ECF No. 105-3, ¶ 5. Likewise, Esmeralda C's sister Elizabeth C. declares that their mother "learned that the process was very different because the rules have changed, and she was afraid that moving forward with the reunification process for my sister would mean that ORR would give her information to immigration officers and she would be detained." ECF No. 105-4, ¶ 4.

These declarations do not support standing because they do not link an unwillingness to sponsor with the Interim Final Rule in particular. The declarations at most support the proposition that the potential sponsor has been deterred by a general fear of increased immigration enforcement and uncertainty about ongoing regulatory changes. *See* ECF No. 35, at 10–11. That general fear and uncertainty would not be redressable by the relief that Plaintiffs seek. "[E]ven if the Court were to enjoin the interim rule as improperly promulgated, potential sponsors could not be assured that their information would be protected under any forthcoming final rule" or other regulatory action. ECF No. 35, at 10, 11 n.2.

Because Plaintiffs lack standing, they may not seek relief for themselves or a class on their Interim Final Rule claims in Counts I, II, and III of the Second Amended Complaint. *See Blum v. Yaretsky*, 457 U.S. 991, 1001 n.13 (1982).

B. Plaintiffs' new allegations show that the Court should not grant any relief on the Paperwork Reduction Act portion of Plaintiffs' APA claim.

In Count IV of the Second Amended Complaint, Plaintiffs allege that ORR's Policy Guide updates are contrary to law and beyond statutory authority in violation of the APA because, among other claims, "ORR's revised sponsor identification and proof of income requirements violate the Paperwork Reduction Act, 44 U.S.C. § 3507(a)." ECF No. 104, ¶ 200. Plaintiffs package their PRA allegation as part of an APA claim because the PRA does not provide a private right of action. *See Alegent Health-Immanuel Med. Ctr. v. Sebelius*, 34 F. Supp. 3d 160, 170 (D.D.C. 2014). The proper remedy for an APA claim is remand for the agency to correct the error, with or without vacatur of the agency action. "When a district court reverses agency action and determines that the agency acted unlawfully, ordinarily the appropriate course is simply to identify a legal error and then remand to the agency, because the role of the district court in such situations is to act as an appellate tribunal." *N. Air Cargo v. U.S. Postal Serv.*, 674 F.3d 852, 861 (D.C. Cir. 2012). It would be "quite anomalous to issue an injunction." *Id.*; *see Bennett v. Donovan*, 703 F.3d 582, 589 (D.C. Cir. 2013). Here, remanding and directing the agency to fix the alleged legal error would serve no purpose because, as Plaintiffs' admit, ORR received OMB approval for a sponsor application form on February 27, 2026. *See* ECF No. 104, ¶ 200.

Plaintiffs continue to seek relief on their PRA claim based on the allegation that ORR "has not implemented the approved form and continues to require sponsors to complete an unauthorized information collection." *Id.* ORR currently uses Sponsor Application Version 18 ("Version 18"). Biswas Decl. ¶¶ 6. In Version 18, ORR accepts only a limited set of documentation for proof of income. *Id.* OMB approved Sponsor Application Version 19 ("Version 19") on February 27, 2026. *Id.* ¶ 7. Version 19 accepts a broader list of documents for proof of income. *Id.* Importantly, all the documents listed in Version 18 are part of the longer list of documents that OMB approved on February 27, 2026. *Id.* ¶¶ 6–8. ORR is not collecting any information or documents not approved for collection by OMB. *Id.* ¶ 8. Thus, to the extent Plaintiffs allege that ORR's information collection must be set aside as unlawful under the APA, the Court has no reason to grant that relief because ORR has obtained OMB approval for its information collection.

Plaintiffs seek additional injunctive relief, but Plaintiffs have not shown that such relief is available and appropriate under the APA. Specifically, Plaintiffs want the Court to require ORR to "permit sponsors to establish their identification and financial stability through other reasonable means." ECF No. 104, ¶ 200; ECF No. 92, at 5. To support this request, Plaintiffs cite the D.C. Circuit's decision in S*aco River Cellular, Inc. v. FCC*, 133 F.3d 25, 33 (D.C. Cir. 1998). The court in *Saco River Cellular*, however, held simply that the agency did not commit error when it permitted an applicant to amend its application to submit other evidence of compliance with a legal condition. *Id.* The court did not hold that a district court hearing an APA claim may order an agency to take similar action. The court certainly did not override an agency's judgment concerning what proof is necessary to ensure that a sponsor will provide for a child's safety and well-being. While it may be lawful for an agency on its own to reconsider an application with relaxed standards to remedy a PRA violation, Plaintiffs have not shown that the Court may order that action through an APA claim. Ultimately, Plaintiffs' real disagreement is with ORR's Policy Guide updates themselves, not with the sponsor application form. The Court should not grant Plaintiffs any relief under their PRA argument.

C. The new Plaintiffs do not affect Defendants' other arguments for summary judgment.

In their cross-motion for summary judgment and reply, Defendants provided many other reasons why the Court should grant summary judgment for Defendants: (1) the claims of the released Plaintiffs are moot; (2) Plaintiffs lack standing to bring their PRA claim; (3) Plaintiff Immigrant Defenders lacks standing as to all claims; (4) the Interim Final Rule is not final agency action subject to APA review; (4) the Interim Final Rule is procedurally proper and substantively lawful; (5) the Policy Guide updates are procedurally proper and substantively lawful; and (6) Plaintiffs are not entitled to the remedies they seek. ECF No. 71; ECF No. 76. Those arguments remain unchanged by the new named Plaintiffs and the other new allegations in the Second Amended Complaint. Defendants continue to be entitled to summary judgment for all the reasons in their original briefing.

III. Conclusion

For the foregoing reasons and all the reasons in Defendants' original briefing, the Court should deny Plaintiffs' motion of summary judgment and grant Defendants' cross-motion for summary judgment.

Dated: June 15, 2026

Respectfully submitted,

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANGELICA S., *et al.*, Plaintiffs, v. UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES, *et al.,* Defendants.	Civil Action No. 25-1405 (DLF)

DECLARATION OF TOBY BISWAS

I, **Toby Biswas**, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. This declaration also incorporates my previous declaration in this case.

2. I am submitting this declaration in the above-captioned matter in order to provide information to the Court concerning the status of the additional Plaintiffs as well as an update to ORR's continued compliance with the Paperwork Reduction Act.

Case Information on the Additional Plaintiffs

3. Lorenzo V. was referred to ORR by U.S. Border Patrol. He entered ORR custody on September 11, 2025. On September 17, 2025, Lorenzo had his check-in where he indicated that he had never met his potential sponsor, his brother, before. On October 7, 2025, all sponsor vetting requirements were still pending. On November 14, 2025, ORR attempted to contact Lorenzo's brother for updates on his potential interest in pursuing sponsorship, but there was no answer. On November 21, 2025, ORR was able to establish contact with Lorenzo's brother who confirmed his continued interest in sponsoring Lorenzo. On December 12, 2025, ORR reminded Lorenzo's brother of the outstanding items for Lorenzo's sponsorship application. On December 19, 2025,

ORR contacted Lorenzo's brother again regarding the requirement for the timely submission of sponsor application supporting documentation, and notified him that if he or any adult household members/alternate caregivers did not have an SSN or an ITIN that they should apply for one. On January 6, 2026, Lorenzo's brother reported that he was unable to obtain an acceptable form of ID and that his wife who is a U.S. citizen would proceed as Lorenzo's sponsor instead. At that time, ORR reminded him that as an adult household member, he would still be required to provide an ID that meets ORR's requirements. On January 23, 2026, Lorenzo's brother informed ORR that he would be declining to proceed with the sponsorship. On February 26, 2026, ORR contacted Lorenzo's adult sister-in-law regarding her interest in pursuing sponsorship. On March 4, 2026, Lorenzo informed ORR that he would prefer to have an identified adult cousin sponsor him instead; Lorenzo's father, however, expressed his desire for Lorenzo's sister-in-law to be Lorenzo's sponsor. ORR contacted Lorenzo's sister-in-law on March 4th and March 5th since there had been no activity on the sponsorship application. ORR followed up with the sister-in-law on March 11th, 12th, 13th, 18th, 19th, and received no responses. On March 24, 2026, the sister-in-law contacted ORR and indicated she had completed the sponsorship application. However, ORR responded to her that it was still incomplete and offered technical assistance. On April 6, 2026, ORR reached out to Lorenzo's sister-in-law for scheduling her fingerprinting appointment. On April 9, 2026, Lorenzo's sister-in-law informed ORR that she had not been able to complete her fingerprinting appointment. On April 10, 2026, Lorenzo was transferred to another care provider. On April 17, 2026, Lorenzo's sister-in-law communicated via text message that she no longer wished to continue with the sponsorship process because of the documentation requirement. On April 20, 2026, ORR contacted Lorenzo's father to identify a new sponsor and he identified Lorenzo's cousin. ORR first attempted contact that day but was unsuccessful. On April 27, 2026, ORR successfully made contact with Lorenzo's cousin to begin initial screening. On May 28, 2026, Lorenzo's cousin submitted his proof of address, proof of income, and identification. On June 2, 2026, Lorenzo's cousin completed the online sponsorship application. The alternate caregiver has submitted her authorization for release of information, and the fingerprints have been completed for both individuals. However, a DNA test is still pending. On June 11, 2026, ORR completed a referral for a home study to be conducted.

4. Esmeralda C. was referred to ORR by U.S. Border Patrol. She entered ORR custody on September 10, 2025 and was admitted with her infant son. On September 17, 2025, Esmeralda's mother informed ORR that she was unable to sponsor Esmeralda due to personal safety concerns. She then provided the contact information for Esmeralda's adult sister as a potential sponsor. ORR attempted contact with Esmeralda's sister on September 12 and 23 with interpreter assistance. On September 23, 2025, after reviewing the responsibilities of sponsorship, Esmeralda's sister declined to move forward with the sponsorship process. Esmeralda's mother then identified a family friend as another potential sponsor and that referral was submitted to ORR on October 2, 2025. ORR made outreach attempts on October 9 and 17. On October 24, 2025, the family friend informed ORR that he would be unable to proceed after considering the responsibilities of sponsoring both Esmeralda and her young child. On October 27, 2025, Esmeralda's mother advised ORR that her family friend would not be pursuing the application. On October 30, 2025, Esmeralda's mother reported there were no additional individuals available or willing to serve as sponsors. After discussion with her mother and sister, Esmeralda expressed her desire to move forward with placement in long-term foster care.

5. Brian G. was referred to ORR by U.S. Border Patrol. He entered ORR custody on May 3, 2025. On May 5, 2025, Brian's cousin submitted a sponsorship application. Brian's case

was initially submitted to ORR Headquarters review for release on October 1, 2025 by the federal field specialist. On May 7, 2025, ORR conducted background checks for Brian's cousin and her four household members. A possible criminal record was found for one of the household members. On May 8, 2025, fingerprint appointments were completed for Brian's cousin and her household members, except for one who could not attend. On May 13, 2025, Brian's cousin contacted ORR to postpone the fingerprint appointment for the last outstanding household member. On May 14, 2025, ORR discovered that the information provided by another household member for background checks does not match up with what was discovered during the checks, prompting further investigation and follow-up. On May 17, 2025, ORR informed Brian's cousin that her household members all needed valid IDs as their current forms of ID would not meet the requirements. Brian's cousin's household members were still pending their IDs on May 30, 2025 as they were waiting for their immigration statuses to adjust. ORR followed up again with Brian's cousin on June 12, 2025 and informed her that the IDs for her household members are still pending. Brian's cousin indicated to ORR that she is in the process of submitting an apartment application so that she would move out. From June 14 to July 23, 2025, ORR was waiting for Brian's cousin to either move out or provide her household member's identification documents. On July 30, 2025, Brian's cousin communicated to ORR that she is now planning to have her parents relocate instead for her to continue on with the sponsorship application. From August 1 to 8, 2025, ORR was waiting for the household members to relocate. On August 13, 2025, ORR submitted a discretionary home study request to confirm that the household members had truly relocated. On August 20, 2025, a home study was conducted with no obvious concerns. On August 25, 2025, a positive home study report was received by ORR. On August 31, 2025, Brian's case was recommended for release, subject to federal field specialist's approval. On September 2, 2025, ORR notes that Brian suffered a fall over the weekend resulting in a fracture and would now require medical clearance in order for release. ORR communicated this news to Brian's cousin on September 3, 2025. From September 5 to 29, 2025, ORR was awaiting medical clearance pending Brian's appointment with an orthopedic specialist on October 10, 2025. On October 3, ORR remanded Brian's case and communicated on October 6, 2025, to Brian's federal field specialist that additional sponsor vetting would be needed because of the new and enhanced sponsor vetting policies implemented. From October 2025 to December 2025, Brian underwent a number of medical and dental treatments, including minor surgery. Brian's sponsor background documents expire on January 28, 2026 and his sponsor's fingerprints expired on February 2, 2026. On February 9, 2026, Brian's cousin informed ORR that her parents moved in with her therefore there is a change in her household composition. On February 11, 2026, Brian's cousin confirmed to ORR that she will complete new additional vetting requirements due to her having new household members. On February 25, 2026, Brian's cousin notified ORR that she will be potentially withdrawing from sponsorship but that her decision was not final and that she would let confirm later. On February 27, 2026, Brian's cousin requested until March 2, 2026 to make her final decision on whether she would continue with the sponsorship. On March 2, 2026, Brian's cousin expressed her desire to withdraw from sponsorship. On March 3, 2026, ORR received the sponsorship withdrawal letter. On March 19, 2026, Brian decided to transfer to a long-term foster care program. On April 16, 2026, Brian was transferred to long-term foster care. On May 13, 2026, Brian mentioned his uncle as a potential sponsor. On May 19, 2026, all of Brian's potential sponsors decided not to continue with sponsorship.

Paperwork Reduction Act Issue Update

6. ORR currently uses Sponsor Application Version 18 (“Version 18”). Version 18 accepts only the following forms of documentation for proof of income:

- Previous year’s tax return if in the United States during prior year;
- Copy of paystubs for at least the past 60 days continuously; or
- An original letter from the sponsor’s employer verifying their employment and salary information, signed within the past 60 days. The letter must be on company letterhead and contain verifiable contact information for the employer and supervisor. An ORR representative must speak with the supervisor or company Human Resources division to verify the information in the letter.

7. ORR obtained OMB approval of Sponsor Application Version 19 (“Version 19”) on February 27, 2026. Version 19 broadens the acceptable forms of documentation for proof of income to include documentation of:

- Income received from assets (for example, a 1099-INT tax form from the previous year or receipts from rental income received covering the last 60 days) or investments
- Unemployment benefits,
- Strike pay
- Gifts
- Annuities
- Alimony
- Proceeds from a settlement
- Public Assistance Records:
  - Temporary Assistance for Needy Families (TANF)
  - Supplemental Security Income (SSI)
  - Cash Assistance
- A balance page from the sponsor’s most recent quarterly bank statement

- Affidavit of Financial Support (Form SAP-8) (multiple forms may be submitted).

8. The list on Version 18 of Form SAP-3 includes all documents that OMB approved on February 27, 2026. ORR is not collecting any information or documents not approved for collection by OMB.

9. Currently, a publication date for Version 19 has not been set.

10. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Washington, D.C.

June 15, 2026

TOBY R. BISWAS -S

Digitally signed by TOBY R. BISWAS -S
Date: 2026.06.15 18:22:10 -04'00'

Toby Biswas
Assistant Deputy Director for Policy
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