



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034  
Washington, D.C. 20201 | [www.acf.hhs.gov](http://www.acf.hhs.gov)

August 5, 2025

The Honorable Charles E. Grassley  
United States Congress  
Washington, D.C. 20515

Senator Grassley:

Thank you for your request for information regarding the Office of Refugee Resettlement (ORR), Unaccompanied Alien Children Bureau. I appreciate the opportunity to provide the details you requested during the May 1, 2025, briefing with your staff and Interim Director Salazar and your patience with our response. In an effort to provide a thorough response we have included a policy summary for each of your respective bullets below.

#### **NOTIFICATIONS OF CONCERN**

On April 22, 2025, the U.S. Department of Health and Human Services (HHS) referenced via a post on the social media website X, that ORR was reviewing approximately 65,000 Notices of Concern (NOCs) that had gone unaddressed between 2021 and 2024. As defined in 45 C.F.R 410.1001 and described in the UAC Bureau Policy Guide section 6.8.6, a “Notification of Concern” is an instrument used by home study and post-release services (PRS) providers, ORR care providers, and the ORR National Call Center (ORRNCC) staff to document and notify ORR of certain concerns that arise after a child is released from ORR care and custody. These notices may range from required change of address notices to more serious concerns raised regarding missing children or victimization of children. ORR Home study and PRS providers, ORR care providers, and ORRNCC staff must submit a NOC for many areas of concern including, but not limited to suspected cases of human trafficking; abuse (including sexual abuse), abandonment, and neglect; disappearances; contact by or involvement with organized crime; and potential fraud, such as document fraud or information fraud or fees charged for services that are to be provided free of charge. NOCs must be submitted to ORR as soon as possible but no later than 24 hours of first suspicion or knowledge of the event(s) and, if applicable, documented in the released child’s PRS case file.

#### **EMERGENCY INFLUX FACILITIES (EIS)**

In an effort to accept UAC referrals from the U.S. Department of Homeland Security in a timely fashion, as required by statute, in FY2021, ORR activated 14 EIS to provide temporary UAC bed capacity. Regarding your request for records related to the Pomona Emergency Intake Site funded by Cherokee Federal in Pomona, California, those documents are attached and redacted where necessary.

#### **SPONSOR VETTING, HOME STUDIES, AND RELEASE**

ORR has a statutory responsibility to provide care and custody for UAC until they are appropriately and safely released to a vetted sponsor — usually a parent or close relative — or until they are discharged from ORR custody following an immigration judge’s order of removal,

turn 18 years of age, or obtain lawful immigration status in the United States. The process of identifying and vetting sponsors for UAC can be found in 45 C.F.R. 410.1202 and UAC Bureau Policy Guide, Section 2.

Per 8 U.S.C. 1232(c)(3)(A) and the UAC Bureau Policy Guide 2.5, all Category 2B and 3 sponsors<sup>1</sup> must submit to an FBI National Criminal History Check, based on digital fingerprints or digitized paper prints.

A home study is an in-depth investigation of the potential sponsor's ability to ensure the child's safety and well-being. A home study includes an investigation of the living conditions and standard of care that the unaccompanied alien child would receive if released and placed with a particular potential sponsor. The process includes interviews with the potential sponsor and other household members. Conducting a home study allows the case worker to assess the potential sponsor's ability to meet the child's needs, educate and prepare the potential sponsor for the child's release, and to corroborate information gathered through the sponsor assessment and vetting processes. A home study consists of interviews, a home visit, and a written report containing the home study case worker's findings. The home study provider then makes a recommendation to ORR regarding the release of the child to the sponsor, and the Federal Field Specialist (FFS) makes the final decision as the agent of HHS/ORR based on all of the available information. All releases following home studies require post-release services.

In some cases, the provider will recommend a home study of the potential sponsor's home prior to a release decision. A home study may be mandated by the TVPRA, ORR regulation, ORR policy at UAC Bureau Policy Guide section 2.4.2, or may be done at the discretion of the case manager and coordinator.

Over the course of the previous administration, ORR revised policies related to home studies to clarify procedural timelines, delegate decision-making authority, expand criteria for discretionary and mandatory studies, and align requirements for children with disabilities with 45 C.F.R. 410.

### *TVPRA Mandatory Home Studies*

The TVPRA requires home studies in the following circumstances:

---

<sup>1</sup> From UAC Bureau Policy Guide Section 2.2.1:

ORR has grouped unaccompanied alien children's cases into the following categories:

Category 1: Parent or legal guardian. This includes qualifying stepparents that have legal or joint custody of the child or teen.

Category 2A: A brother; sister; grandparent or other immediate relatives (e.g., aunt, uncle, first cousin) who previously served as the child's primary caregiver. This includes biological relatives, relatives through legal marriage, and half-siblings.

Category 2B: An immediate relative (e.g., aunt, uncle, first cousin) who was not previously the child's primary caregiver. This includes biological relatives, relatives through legal marriage.

Category 3: Other sponsor, such as distant relatives and unrelated adult individuals

Category 4: No sponsor identified

- The child is a victim of a severe form of trafficking in persons;
- The child has a disability as defined by the Americans with Disabilities Act of 1990, as amended (42 U.S.C. 12102) and requires particularized services or treatment;
- The child has been a victim of physical or sexual abuse under circumstances that indicate that the child's health or welfare has been significantly harmed or threatened; or
- The child's sponsor clearly presents a risk of abuse, maltreatment, exploitation, or trafficking, to the child based on all available objective evidence.

#### *ORR Mandated Home Studies*

Currently, ORR requires a home study before releasing any child to a sponsor in the following circumstances:

- The potential sponsor is seeking to concurrently sponsor two or more children (regardless of whether the potential sponsor has previously sponsored or sought to sponsor a child) and at least one of the children is unrelated to the potential sponsor;
- The potential sponsor has previously been the sponsor of two or more children and is now seeking to sponsor one or more additional children (regardless of whether the previous or current children are related to the potential sponsor); or
- The potential sponsor is seeking to sponsor an unrelated child who is 12 years or under.

#### *Discretionary Home Studies*

In circumstances in which a home study is not required by the TVPRA or ORR policy, the case manager and case coordinator may recommend that a home study be conducted if they agree that the home study may provide additional information to determine that the sponsor is able to care for the health, safety and well-being of the child.

#### **VULNERABLE CHILDREN**

In response to your request for information regarding children with noted vulnerabilities or abuse risks — including disabilities, abuse concerns, or unsafe sponsor indicators — with outcomes and services documented, ORR does not track this aggregate data. Upon admission to ORR care and custody, per 45 C.F.R. 411.1307(b)(2), providers are required to conduct a holistic assessment of the child's health, including screening for signs/symptoms of illness or mental distress and referring the child for medical care/testing as needed; any healthcare conditions or needs they have (including disabilities, allergies, diseases, mental and behavioral health issues, as well as medications), and reviewing all of the child's records for health issues/needs, including but not limited to those identified while in Customs and Border Protection (CBP) care to identify any immediate needs.

In addition, providers also screen children for potential concerns of severe labor and/or sex trafficking. Should the provider have concerns of suspected trafficking, this is documented in the child's case file and the child is referred to the Office of Trafficking in Persons (OTIP) to identify if the child is eligible for federally funded benefits and services. In addition, the care provider takes additional steps to vet to the highest degree potential sponsors to screen for

traffickers who may attempt to coerce or threaten the child, increasing safety mechanisms to ensure children have supervised contact with safe individuals as outlined in their safety plan, and other trauma-informed care practices to allow the child to safely process past incidents and educate them on healthy relationships and what to do if they feel threatened or unsafe.

Again, in some cases, the provider will recommend a home study of the potential sponsor's home prior to a release decision. A home study may be mandated by the TVPRA, ORR regulation, ORR policy, or at the discretion of the case manager and coordinator.

### **FRAUD, CRIMINALITY, AND TRAFFICKING CONCERNS**

Finally in response to your request for information regarding providers' identification and handling of potential criminal activity, we would like to provide our improvements over the last several months. In February 2025, ORR launched an interagency initiative to establish a whole of government approach to identify and address suspected fraud, exploitation, and trafficking in the UAC Bureau program. This effort is led by the ORR Integrity & Accountability (I&A) Team and includes personnel from the ORR UAC Data Division, ORR UAC Bureau, Department of Homeland Security Investigations (HSI), and Enforcement and Removal Operations (DHS/ERO) Juvenile Coordinators. As part of this whole of government approach, the I&A Task Force is also coordinating with Health and Human Services Office of General Council (HHS/OGC), HHS/Office of Inspector General (HHS/OIG), the Department of Justice (DOJ), the Department of Labor (DOL), the Social Security Administration, Department of Treasury, and other USG entities to use every available resource to identify fraudulent and criminal activities that impact the children served by the UAC Program. Trafficking and criminal activity cases of concern are referred to the appropriate investigative body. Prior to the task force, I&A reported over 1,600 allegations of fraud perpetrated by sponsors, UACs, and/or parents and/or guardians in country of origin in FY 2024.

### **REQUESTED DATA**

Enclosed, please find comprehensive data relevant to your requests on the redacted NOCs for the 24 contractors and grantees you identified; census records from Emergency Intake Sites during their time of operation; fingerprint, background check, and home studies breakdowns for Category 2B and 3 sponsors; home study information for children 12 and under (though please note home studies were not required by policy in all cases); and a breakdown of individuals attempting to sponsor multiple children.

We have included summary tables in the appendices attached and have enclosed further records broken down by UAC and Sponsor ID in additional zip files to be fully responsive to your request. ORR continues to coordinate with DHS on cases of concern regarding children that have been in ORR care at any point in time, including those that have been included in these files. ORR takes its statutory responsibility to ensure child safety seriously. Thank you for your concern and shared commitment for the safety and well-being of unaccompanied alien children.

In conclusion, we have provided all the information requested to the best of our ability; however, due to limitations within our current data systems, some of the information may be subject to

minor inaccuracies. While the data may not be perfectly formatted or complete in every instance, we are confident it reflects a reliable and good-faith effort to fulfill your request as accurately as possible.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive, slightly slanted style.

Andrew Gradison  
Acting Assistant Secretary  
Administration for Children and Families  
U.S. Department of Health and Human Services



## Office of Refugee Resettlement (ORR) Summary Data

Since March 1, 2003, the responsibility for the care and placement of unaccompanied alien children (UAC) has been delegated to the U.S. Department of Health and Human Services' (HHS), Director of the Office of Refugee Resettlement (ORR), as directed by Section 462 of the Homeland Security Act of 2002. Since then, ORR has provided care for thousands of children, guided by child welfare principles, and the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPPRA), as well as implementing ORR regulations. Under these authorities, ORR is responsible for the custody and care of unaccompanied alien children from the time they are transferred from the U.S. Department of Homeland Security or another federal agency until they are placed with a vetted sponsor. To meet these obligations, ORR funds nearly 300 care provider programs in 27 states, offering a range of care settings such as shelters, foster care, group homes, heightened supervision facilities, and residential treatment centers. In addition to providing services such as education, health care, counseling, legal access, and case management, ORR maintains readiness to rapidly expand capacity when needed. All services are delivered in accordance with child welfare best practices and tailored to each child's age, language, culture, and individual needs.

Please see aggregate and summary tables below for the data pertaining to your May 1, 2025, request made during the briefing with your staff and Interim Director Salazar. More expansive data broken down by UAC and Sponsor ID can be found in the enclosed ZIP files and are labeled in accordance with the Appendix number listed in this report.

### Demographic Breakdown

From October 1, 2020, through September 30, 2024, ORR cared for 468,736 unaccompanied alien children. To date in the 2025 Fiscal Year (beginning October 1, 2024, through June 5, 2025), ORR has cared for 21,399 unaccompanied alien children.

Table 1.1:

Top 10 Countries of Birth (FYs 2021-2024)

Rank	Country	Total Population of UAC
1	Guatemala	200,592
2	Honduras	130,788
3	El Salvador	49,587
4	Mexico	34,205
5	Ecuador	11,642
6	Nicaragua	8,500
7	Venezuela	7,708
8	Haiti	4,544
9	Colombia	3,900
10	Cuba	3,800

Table 1.2:

Top 10 Countries of Birth (FY2025 to Date)

Rank	Country	Total Population of UAC
1	Guatemala	7,518
2	Honduras	5,026
3	Mexico	3,188
4	El Salvador	1,882
5	Venezuela	1,262
6	Colombia	474
7	Ecuador	425
8	Haiti	303
9	Cuba	252
10	Nicaragua	208

Table 2.1: By Age Group (FYs 2021-2024)

Age at Placement	Count of UAC
0 – 5	14,625
6 – 11	54,269
12 – 15	138,141
16 – 17	258,006
18+*	3,549

Table 2.2: By Age Group (FY2025 to Date)

Age at Placement	Count of UAC
0 – 5	891
6 – 11	3,280
12 – 15	6,292
16 – 17	10,825
18+*	112

\*Note: UACs may be in care after the age of 18 due to a multitude of factors, the most likely being a post-placement age redetermination. These cases also include UACs under 18 at the time of referral, but turned 18 prior to placement.

### Notifications of Concern (NOC)

ORR is able to share 38,700 NOCs from January 20, 2021, through January 19, 2025, specific to the 24 different contractors and grantees identified by your office. Sensitive personal identifiable information (PII) is redacted for privacy and security concerns. See [Appendix A](#).

### Emergency Influx Facilities (EIS)

See [Appendix B](#) for a full compendium of the daily censuses for each EIS facility for the entirety of their use. Census documents are used to track the capacity at each facility and come directly from placements in the UAC Portal. After July 2, 2022, remaining EIS were converted to Influx Care Facilities. No records of children are deleted from these documents. Please also find a summary census of all EIS in Table 3.

Table 3: Summary of EIS Census

Program Name	Total UAC Count
ORR EIS/ICF at Ft. Bliss	34,593
Pecos Children's Center (PCC) EIS/ICF	25,466
Pomona Fairplex EIS	9,658
San Diego Convention Center EIS	3,212
Kay Bailey Hutchison Convention Center EIS	2,851
Freeman Expo Center EIS	2,181
Midland EIS	1,921
Delphi EIS	1,800
Long Beach Convention Center EIS	1,698
Dimmit EIS	1,134
Starr Commonwealth EIS	959
NACC Houston EIS	481



<b>Lackland EIS</b>	455
<b>Pennsylvania International Academy (PIA) EIS</b>	146

### UAC PLACED WITH CATEGORY 2B AND 3 SPONSORS – Fingerprints, Background Checks, and Home Studies

Table 4.1 is an aggregate summary of all cases of Category 2B and 3 placements from January 20, 2021, to January 19, 2025, and notes whether fingerprint and/or background checks were requested or received. We note this information is based on documentation, the lack of documentation, or unclear documentation in the UAC Portal.

Table 4.1: Summary of Fingerprint and/or Background Checks for Category 2B and 3 Placements

Description	Count	% of Total
Fingerprint and/or Background Checks Not Requested and/or Not Received	5,660	5.62%
Fingerprint Check Not Requested and/or Not Received	4,661	4.63%
Background Check Not Requested and/or Not Received	1,083	1.07%
Neither Fingerprint nor Background Check Requested and/or Received	84	0.08%
<b>Total # UAC Released to Category 2B and 3 Sponsors from 2021-2025</b>	<b>100,775</b>	<b>100%</b>

Table 4.2 is a summary of all cases of Category 2B and 3 placements from January 20, 2021, to January 19, 2025, where a home study was recommended by either the Case Coordinator (CC), Case Manager (CM), or both, and classified by whether one was conducted. We note this information is based on documentation, the lack of documentation, or unclear documentation in the UAC Portal:

Table 4.2: Summary of Home Study Recommendations for Category 2B and 3 Placements

Description	Count	% of Total
CC or CM Recommended Home Study, Not Conducted	1,683	8.50%
CC and CM Recommended Home Study, Not Conducted	278	1.41%
<b>CC and/or CM Recommended Home Study (Total)</b>	<b>19,750</b>	<b>100%</b>

Table 4.3 is a summary of all cases of Category 2B and 3 placements from January 20, 2021, to January 19, 2025, where any staff or contractor recommended denying release of the child to the potential sponsor.

Table 4.3: Summary of All Denial Recommendations for Category 2B and 3 Placements

CM/CC Initial Consensus	Home Study Completed	Home Study Outcome & Recommendation	Post CM/CC Home Study Consensus	# UAC Released
Agree	Yes	Negative Recommendation	Agree to Deny	1
Agree	Yes	Positive Recommendation	Approve to Release	6
Agree	Yes	Positive Recommendation	Disagreement	4



<b>Agree</b>	No	No Home Study	—	14
<b>Disagree</b>	No	Home Study Canceled	Disagreement	1
<b>Disagree</b>	Yes	Approve Release Pending Completion of Conditions	Disagreement	1
<b>Disagree</b>	Yes	Negative Recommendation	Agree to Deny	10
<b>Disagree</b>	Yes	Negative Recommendation	Approve to Release	2
<b>Disagree</b>	Yes	Negative Recommendation	Disagreement	56
<b>Disagree</b>	Yes	Positive Recommendation	Agree to Deny	7
<b>Disagree</b>	Yes	Positive Recommendation	Approve to Release	78
<b>Disagree</b>	Yes	Positive Recommendation	Disagreement	203
<b>Disagree</b>	No	Home Study in Progress	Disagreement	2
<b>Disagree</b>	No	No Home Study Performed – N/A—	—	560

**Appendix C** contains the detailed tables of all UAC placed with Category 2B and 3 sponsors from January 20, 2021, to January 19, 2025, regarding recommended placements (Table 1), home study findings (Table 2), and sponsor fingerprinting and/or background check status (Table 3).

### Sponsor Vetting and Release

Table 5.1 is a summary of all UAC under the age of 12 placed with a sponsor between January 20, 2021, and January 19, 2025, by the sponsor category and the status of a home study.

Table 5.1: UAC Under 12 by Home Study Status

Home Study Conducted?	Sponsor Category			Total
	1	2	3	
<b>Yes</b>	4,596	1,218	1,257	7,071
<b>No</b>	62,690	14,754	1,699	79,143
<b>Total</b>	<b>67,286</b>	<b>15,972</b>	<b>2,956</b>	<b>86,214</b>

Furthermore, Table 5.2 is a summary of all UAC under the age of 12 placed with a sponsor between January 20, 2021, and January 19, 2025, by sponsor relationship and the status of a home study.

Table 5.2: UAC Under 12 by Sponsor Relationship and Home Study Status

Sponsor Category	Sponsor Relationship	Home Study Conducted?		Grand Total
		Yes	No	



<b>Sponsor Category 1</b>	Mother	3,639	45,167	48,806
	Father	944	17,467	18,411
	Legal Guardian	13	54	67
	Stepfather Legally Adopted	—	2	2
	<i>Subtotal</i>	<i>4,596</i>	<i>62,690</i>	<i>67,286</i>
<b>Sponsor Category 2</b>	Aunt (Non-Primary Caregiver)	370	3,902	4,272
	Grandmother	267	2,804	3,071
	Uncle (Non-Primary Caregiver)	183	2,249	2,432
	Sister	106	1,204	1,310
	Aunt (Primary Caregiver Status Unknown)	49	884	933
	Brother	42	882	924
	Grandfather	51	847	898
	Half-Sibling	55	511	566
	Adult First Cousin (Non-Primary Caregiver)	40	500	540
	Uncle	19	492	511
	Aunt (Primary Caregiver)	15	155	170
	Adult First Cousin	9	97	106
	Uncle (Primary Caregiver)	3	93	96
	Stepfather Non-Lgl Adopt. (Non-Primary Caregiver)	1	20	21
	Adult First Cousin (Primary Caregiver)	—	20	20
	Stepmother Non-Lgl Adopt. (Non-Primary Caregiver)	3	13	16
	Stepfather Non-Lgl Adopted (Primary Caregiver)	2	12	14
	Step Father	—	11	11
	Stepmother Non-Lgl Adopted (Primary Caregiver)	—	10	10
	Sister-in-law (Non-Primary Caregiver)	—	9	9
	Adult Niece (Non-Primary Caregiver)	1	8	9
	Brother-in-law (Non-Primary Caregiver)	—	7	7
	Step Mother	—	6	6
	UAC's Spouse	—	4	4
	Adult Nephew (Non-Primary Caregiver)	—	4	4

	Sister-in-law (Primary Caregiver)	1	2	3
	Stepsister	—	2	2
	Brother-in-law (Primary Caregiver)	—	2	2
	Stepbrother	—	1	1
	Brother-in-law	—	1	1
	Adult Niece (Primary Caregiver)	—	1	1
	Adult Niece	1	—	1
	Adult Nephew (Primary Caregiver)	—	1	1
	<i>Subtotal</i>	<i>1,218</i>	<i>14,754</i>	<i>15,972</i>
<b>Sponsor Category 3</b>	Other Distant Relative	247	1,533	1,780
	Unrelated Sponsor	991	161	1,152
	Godmother	17	5	22
	Godfather	2	—	2
	<i>Subtotal</i>	<i>1,257</i>	<i>1,699</i>	<i>2,956</i>
<b>Grand Total</b>		<b>7,071</b>	<b>79,143</b>	<b>86,214</b>

Table 5.3 is a summary of all UAC under the age of 12 who were released to sponsors who sponsored multiple children between January 20, 2021, and January 19, 2025.

Table 5.3: Sponsors of Multiple Children by UAC Relationship

Current Sponsor	UAC Related?	Count of Sponsors
<b>No</b>	Yes	1,697
<b>Yes</b>	Yes	42,479
<b>No</b>	No	6,386
<b>Yes</b>	No	41,988
<b>Grand Total*</b>	—	<b>92,550</b>

**\*Note:** The total number of individuals sponsoring multiple children may differ from the figures presented in the descriptive table in [Appendix D](#). This is because sponsors can have different current sponsorship statuses for each child, and some may care for both related and unrelated children.

[Appendix D](#) shows the home study results for children under 12 years of age as well as instances where sponsors sought to sponsor multiple children from January 20, 2021, to January 19, 2025. This includes family groups released to the same sponsor.