



## **FIELD GUIDANCE – Revised January 26, 2026 (First Issued August 23, 2023)**

### **RE: Field Guidance #24 – ORR Division of Sponsor Administration Role Guidance**

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## GUIDANCE

This document provides guidance to Office of Refugee Resettlement (ORR) Unaccompanied Alien Children Bureau Care Providers participating in federally led sponsor vetting as completed by the Division of Sponsor Administration (DSA). Updates to FG 24 are focused to clearly communicate responsibilities of care provider Case Managers, and the roles of the newly created Integrity and Accountability Bureau (IAB) Division of Vetting, Division of Sponsor Administration and Division of Case Administration Federal Field Specialist (FFS) positions. The Division of Sponsor Administration responsibilities include:

- Managing and maintaining all sponsorship vetting communications with the potential Sponsors to ensure timely completion of Sponsor Application Packet;
- Initiating and coordinating the background check and sponsor vetting process in collaboration with the Integrity and Accountability Bureau Division of Vetting and dedicated vendor support;
- Meeting sponsors in-person; and,
- Making determinations regarding the potential Sponsor's suitability to sponsor the child.

Where this Field Guidance and the Unaccompanied Alien Children (UAC) Policy Guide or UAC Manual of Procedures (MAP) differ, Care Providers must follow this Field Guidance. Care Providers are encouraged to reach out to their assigned Case Administration Federal Field Specialist, Project Officer, or Contract Officer Representative (COR) with any questions. ORR will review this Field Guidance within 120 days.

## Background

Historically, Care Provider Case Managers have been responsible for facilitating most of the steps in the sponsor vetting process. In 2023, ORR piloted the use of contracted centralized sponsor vetting support to case managers, with the introduction of the Unification Specialist role under the Sponsor Services Initiative. The Sponsor Services Initiative sought to strengthen sponsor vetting practices, prioritize child welfare, ensure the safe reunification of unaccompanied alien children, hereafter referred to as "child" or "children", in ORR care, and reduce the amount of case work burden on case managers. Additionally, if the potential Sponsor had difficulty with any aspect of the reunification process, the contractor offered in-person service.

In response to emergent leadership priorities to eliminate the risks of sponsor fraud, ORR is restructuring the Sponsor Vetting Program. Under this restructuring, all sponsor vetting will be performed by an agile and distributed network of dedicated federal field staff. The Division of Sponsor Administration will standardize processes, provide in-person vetting and assistance to potential Sponsors, and ensure each release proceeds safely, efficiently, and in accordance with ORR regulation and policy. The Integrity and Accountability Bureau (IAB) Division of Vetting – Sponsor Vetting Branch will support the Division of Sponsor Administration vetting process by identifying, mitigating, and reporting all suspected or actual incidents of fraud, smuggling, exploitation, and trafficking risk.

TABLE 1: Primary Roles and Responsibilities

Role	Responsibilities	Reports To	Collaborates With
Division Chief, Division of Sponsor Administration (DSA)	<ul style="list-style-type: none"> <li>Oversee DSA Program compliance</li> <li>Advise ORR Leadership on progress towards strategic objectives</li> <li>Evaluate and recommend program technology needs and solutions</li> <li>Oversee successful transition from SSI to DSA</li> <li>Advise on complex cases, including TVPRA criteria</li> </ul>	Assistant Deputy Director of Operations	<ul style="list-style-type: none"> <li>DSA-FFS-S</li> <li>DSA-FFS</li> <li>Division Chief, Division of Case Administration (DCA)</li> <li>ORR Senior Leadership Team</li> <li>UACB Senior Leadership Team</li> </ul>
Division Chief, Division of Vetting (DoV) - Integrity and Accountability Bureau (IAB)	<ul style="list-style-type: none"> <li>Oversee efforts of assigned <i>Division of Vetting, Sponsor Vetting Branch</i>, to identify, mitigate, and report actual or suspected fraud, smuggling, exploitation, criminality, and trafficking risk in the sponsor vetting process</li> </ul>	Bureau Deputy Director – Integrity and Accountability Bureau	<ul style="list-style-type: none"> <li>Assistant Deputy Director of Operations</li> <li>Assistant Deputy Director of Policy</li> </ul>
Division of Sponsor Administration – Federal Field Specialist Supervisor (DSA-FFS-S)	<ul style="list-style-type: none"> <li>Supervise DSA Field personnel</li> <li>Staff complex cases, including Sponsor, HHM, ACG issues and TVPRA cases</li> <li>Monitor for compliance with regulations and policy mandated deadlines</li> <li>Deploy to complete in-person sponsor vetting</li> </ul>	Division Chief, Division of Sponsor Administration	<ul style="list-style-type: none"> <li>Assistant Deputy Director of Operations</li> <li>DSA FFS</li> <li>Division of Case Administration (DCA-FFS)</li> <li>ORR Vendors and Contractors</li> <li>UAC Division of Policy Coordination and Intergovernmental Affairs (DPCIA)</li> <li>ORR IAB</li> </ul>

Role	Responsibilities	Reports To	Collaborates With
Division of Sponsor Administration – Federal Field Specialist (DSA FFS)	<ul style="list-style-type: none"> <li>Coordinates with DPO-IA, PCM, IAB, and DCA-FFS on sponsor vetting process.</li> <li>Meet Sponsor in-person to examine and collect supporting documentation, complete DNA swab (if applicable), schedule fingerprinting, and assist the Sponsor in completing any outstanding <i>Sponsor Application</i> components, as needed.</li> <li>Verify Sponsor address</li> <li>Provide technical assistance to Sponsor/ HHM/ ACG with all elements of sponsor vetting process, including completion of <i>Sponsor Application</i> via Horizon App.</li> <li>Request all ORR-required background checks with contractor support as available</li> <li>Conduct Sponsor Vetting Tool Sponsor Profile and Sponsor Flag searches</li> <li>Review Home Studies as applicable</li> <li>Review and record results of fingerprint background check, internet background check, IAB case review and DNA test (if applicable)</li> <li>Make Sponsor Suitability Determination</li> </ul>	Division of Sponsor Administration, Federal Field Specialist Supervisor	<ul style="list-style-type: none"> <li>DCA-FFS</li> <li>DSA-FFS-S</li> <li>DPO-IS</li> <li>Sponsor</li> <li>HHM</li> <li>ACG</li> <li>FieldPrint (Fingerprinting)</li> <li>Deployed Resources, LLC (DNA testing)</li> <li>Project Officer</li> <li>ORR IAB</li> <li>Consulates (as applicable)</li> <li>Additional contracted services, as applicable</li> </ul>
Division of Case Administration – Federal Field Specialist Supervisor (DCA-FFS-S)	<ul style="list-style-type: none"> <li>Supervise DCA Federal Field personnel</li> <li>Staff complex cases, including sponsor, HHM, ACG issues and TVPRA cases</li> <li>Monitor for compliance with regulations and policy mandated deadlines</li> </ul>	Branch Chief, Division of Case Administration	<ul style="list-style-type: none"> <li>Assistant Deputy Director of Operations</li> <li>Division of Sponsor Administration (DSA-FFS)</li> <li>Division of Case Administration (DCA-FFS)</li> <li>ORR Vendors and Contractors</li> <li>DPCIA</li> <li>IAB</li> </ul>

Role	Responsibilities	Reports To	Collaborates With
Division of Case Administration – Federal Field Specialist (DCA-FFS)	<ul style="list-style-type: none"> <li>Liaise between DSA-FFS and Care Provider Case Manager, in addition to other community partners</li> <li>Approval of UAC placement decisions, release decisions and transfer decisions</li> <li>Technical assistance to Care Providers</li> <li>Home Study/ Post-Release Services (PRS) Request approval</li> <li>HS/PRS Report review and issue PRS-level recommendations</li> <li>Participates in case staffings as necessary</li> </ul>	DCA-FFS-S, Division of Case Administration	<ul style="list-style-type: none"> <li>DSA-FFS</li> <li>Care Provider Case Manager</li> <li>HS/PRS provider</li> <li>IAB</li> </ul>
Division of Vetting, Sponsor Vetting Branch – Integrity and Accountability Bureau (IAB)	<ul style="list-style-type: none"> <li>Conduct review of vendor-provided sponsor background check results</li> <li>Coordinates with the Division of Incident Response and federal investigative partners to determine if there is an existing open criminal investigation on sponsors.</li> <li>Based on information provided by federal law enforcement partners, provide information and recommendations to inform DSA-FFS Sponsor Suitability Determination.</li> </ul>	Director, Integrity and Accountability Bureau	<ul style="list-style-type: none"> <li>DSA-FFS</li> <li>Contracted sponsor background check vendors</li> <li>Division of Incident Response</li> </ul>
Division of Provider Management – Project Officer (PO)	<ul style="list-style-type: none"> <li>Oversee programmatic and technical aspects of grants management/compliance</li> <li>Monitor Care Provider facilities</li> <li>Issue Corrective Action Plans (CAPs) as needed</li> </ul>	Division of Provider Management Project Officer Supervisor	<ul style="list-style-type: none"> <li>Care provider Program Director</li> <li>Care Provider Case Manager</li> <li>DCA-FFS</li> <li>DPCIA</li> </ul>
Case Coordinator (CC)	<ul style="list-style-type: none"> <li>Conduct third-party review during transfer request and release recommendation process</li> <li>Integrate stakeholder input from Sponsor Review Team, including the FFS, Child Advocate (if applicable), Case Manager, Attorney of Record (if applicable), and others into the release plan.</li> </ul>	Case Coordinator Contract Supervisor	<ul style="list-style-type: none"> <li>DSA-FFS</li> <li>Child Advocates (if applicable)</li> <li>Care Provider Personnel</li> <li>Local stakeholders</li> <li>DCA-FFS</li> </ul>

Role	Responsibilities	Reports To	Collaborates With
Child Advocates (CA)	<ul style="list-style-type: none"> <li>Make non-binding independent recommendation concerning best interest of the UAC (BID) to inform release decisions for TVPRA-eligible and other vulnerable children.</li> </ul>	Child Advocate Contract Supervisor/ ORR Contracting Officer's Representative	<ul style="list-style-type: none"> <li>DSA-FFS</li> <li>Case Coordinator</li> <li>Child</li> <li>Parents</li> <li>Potential Sponsors</li> <li>Other</li> <li>Government Agencies</li> </ul>
Legal Service Providers (LSPs)	<ul style="list-style-type: none"> <li>Provides the UAC with free legal assistance throughout custody and may contribute to post-18 planning in applicable cases</li> </ul>	Legal Service Provider Contract Supervisor/ ORR Contracting Officer's Representative	<ul style="list-style-type: none"> <li>UAC</li> <li>EOIR</li> <li>DHS ICE FOJC</li> <li>Care Provider Staff</li> </ul>
Program Case Manager (PCM)	<ul style="list-style-type: none"> <li>Coordinate all assessments, services for UAC in care</li> <li>Responsible for overall release recommendation</li> </ul>	Grantee Care Provider Program Director	<ul style="list-style-type: none"> <li>DCA-FFS</li> <li>Project Officer</li> <li>Case Coordinator</li> <li>Child Advocate</li> <li>Care Provider Staff</li> </ul>
Division of Placement Operations – Intake Supervisor (DPO-IS)	<ul style="list-style-type: none"> <li>Receives UAC referrals from federal agencies</li> <li>Identifies appropriate placements for UAC</li> <li>Initiate contact with potential Sponsor and confirm intent to sponsor</li> <li>Initiate sponsor vetting process</li> </ul>	Division Chief, Division of Placement Operations	<ul style="list-style-type: none"> <li>Placement Operations Division Chief</li> </ul>
Division of Placement Operations – Intake Specialist (DPO-IA)	<ul style="list-style-type: none"> <li>Conducts initial sponsor outreach and initiates sponsorship application process via phone and the Sponsor Experience App.</li> <li>Transfers Sponsors to DSA-FFS for vetting</li> </ul>	Division of Placement Operations Intakes Supervisor	<ul style="list-style-type: none"> <li>DSA-FFS</li> <li>DCA-FFS</li> <li>Care Provider Case Manager</li> </ul>
Division of Sponsor Administration – ID Verification Team	<ul style="list-style-type: none"> <li>Schedules the in-person sponsor vetting appointments on behalf of the DSA-FFS</li> </ul>	Division of Sponsor Administration Deputy Director or designee	<ul style="list-style-type: none"> <li>DSA-FFS</li> <li>DHS ICE HSI facilities scheduler</li> <li>Sponsor</li> </ul>

All information sharing between the Division of Sponsor Administration Federal Field Specialist (DSA-FFS) and Care Provider Case Manager must protect Personal Health Information (PHI) and Personal Identifying

Information (PII) as specified in [UAC MAP Appendix 2.1 - How to Protect PII and Create Password Protected Files](#).

## INSTRUCTIONS

The following instructions further differentiate the roles and responsibilities of the care provider Case Manager from members of the Division of Sponsor Administration. Current Case Manager duties remain with the Case Manager if they are not included in the guidance below. The Division of Sponsor Administration requires close ongoing collaboration between the care provider Case Manager, the DCA-FFS, and the DSA-FFS. The Case Manager must share regular weekly case updates received from the DCA-FFS with the child, as known.

### Identification of Potential Sponsors and Initial Contact

During the child's intake process, the Division of Placement Operations (DPO) Intakes Branch reviews individual case referral information received from federal partners, which includes the child's demographic information, background, medical needs, language, and any identified potential Sponsors.

Whenever possible and barring exceptional circumstances contemplated in the UAC Program Foundational Rule at [45 CFR 410.1101\(d\)](#), the DPO designates a placement for each child **within 24 hours of referral**.

Upon referral, the DPO Intakes Supervisor assigns the case to an Intake Specialist who places the child with an appropriate Care Provider in the least restrictive setting. The Intake Specialist will contact the potential Sponsor identified in the referral documentation as soon as the referral is processed, or first thing the next morning if the referral is made after 8 p.m. local time.

**NOTE:** If a child is referred to ORR without a potential Sponsor identified, the care provider Case Manager and/or Clinician will later work with the child during the intakes and assessment process, or during routine case reviews to subsequently identify a potential Sponsor. Potential Sponsors identified after placement are referred by Case Manager to their DCA-FFS. Under these circumstances, the care provider Case Manager **must refer the potential Sponsor for vetting within 24 hours** of identification. The care provider Case will be responsible for entering the potential Sponsor's information in the Sponsor Vetting Tool, providing as much detail as possible, and notifying the DCA-FFS. The DCA-FFS subsequently refers the potential sponsor to the DPO and an Intake Specialist is assigned.

During the initial contact with the potential Sponsor, the **Intake Specialist**:

- 1) The Intake Specialist will identify themselves as a federal employee working for ORR and will ask initial screening security questions to ensure the person on the phone is the individual the child identified in the referral as a potential Sponsor.
  - If screening questions are correctly answered, the Intake Specialist will document these responses in the Intakes Coordination Center and proceed to [Step 2](#).
  - If the potential Sponsor cannot answer the screening questions correctly, the Intake Specialist documents this in the Intakes Coordination Center and continues to work with the sponsor to complete the ARI. The Intakes Specialist must not disclose or indicate that

the potential Sponsor answered incorrectly. Documentation of an unsuccessful security screen may include, but it's not limited to:

- Which specific question(s) they could not answer.
- Whether the individual appeared confused, unsure or declined to answer, or;
- Any additional relevant context (e.g. language barrier, poor reception, stating a need for more time to provide response, etc.)

**NOTE:** The Intake Specialist should avoid making conclusions or assumptions about the individual's intentions and should not label responses as "suspicious" or "concerning".

Once the ARI is complete, the Intake Specialist refers the case to the DSA-FSS via the ICC to continue the sponsor vetting process, proceeding from [Step 13](#).

- 2) Inquires about the relationship between the potential Sponsor and child, if applicable, and determines the potential Sponsor's willingness to pursue reunification with the child.

**NOTE:** If the potential Sponsor indicates that they intend to pursue sponsorship for the child, the Intake Specialist continues to [Step 3](#). If the potential sponsor declines or defers, the Intake Specialist notes this in the case record and continue at [Step 8](#) below.

- 3) Describes ORR's role in the reunification process, reviews fraud scheme disclosures, affirms that ORR does not charge any fees for the child in care or the processing of sponsor applications, and explains how ORR connects to the child's immigration proceedings following guidance in [UAC Policy Guide Section 2.2.2 - Contacting Potential Sponsors](#) and its corresponding [UAC MAP Section 2.2.2](#) guidance.
- 4) Describes the sponsorship application process and documentation requirements.
- 5) Asks the potential Sponsor to send the Intake Specialist via email, text, or direct upload to the *Sponsor Application Packet* (SAP) a copy a high-resolution digital photo or scan of the potential Sponsor's valid, government-issued photo ID, as specified in [UAC Policy Guide Section 2.2.4 – Required Documents for Submission with the Sponsor Application](#), noting that the ID provided must be available for physical inspection at later steps in the sponsor process.
  - At the same time, the potential sponsor must provide a legible, forward facing, recent color photograph for comparison with the submitted ID which will later be reviewed by the DSA-FFS for match to the ID.
  - If the potential Sponsor submits their ID via email or text, the Intake Specialist uploads the file to the Sponsor Vetting Tool following ORR Record's Management *Guide for Accessing Text Messages* protocol.
    - The Intake Specialist is not responsible for verifying the authenticity or validity of the ID.

**NOTE:** If the potential Sponsor is a Category 1 parent or legal guardian and is unable to provide an ID that complies with ORR policy, as cited above, they may be eligible for an exemption from the ORR Director on a case-by-case basis. See [Field Guidance 26: Fingerprint Background Checks and Acceptable Supporting Documentation for a Family Reunification Application](#) and

[FAQ #17 Revised Fingerprint Requirements and Acceptable Supporting Documentation for a Sponsorship Application \(Field Guidance #26\)](#) for additional details.

- 6) Electronically sends the potential Sponsor the *Sponsor Application*, (Form SAP-3) also known as the web-based Sponsor Application, the *Authorization for Release of Information (ARI)* (Form SAP-2), the *Letter of Designation for Care of a Child* (Form SAP-6), the *Sponsor Handbook*, the *Sponsor Care Agreement*, and all other required informational materials outlined in [UAC Policy Guide Section 2.2.3 - The Sponsor Application](#).

**NOTE:** DSA-FFS do not accept paper applications; potential Sponsors should exhaust all options to submit their *Sponsor Application* and supporting documents via the SAP web or mobile app. When the sponsor reports insurmountable barriers to completing the SAP online or in the app, the case must be escalated to the DSA-FFS Supervisor to process a hardcopy submission via an ORR Regional Office or Headquarters; alternatively, hardcopies may be printed and completed by the potential Sponsor, then scanned and emailed to their DSA-FFS. If completing a hardcopy application, the potential Sponsor must submit their *Sponsor Application* and copies of supporting documentation in hardcopy utilizing a wet signature following instructions provided by the DSA-FFS Supervisor. Potential Sponsors completing the SAP via hardcopy must provide full-color, high-resolution photocopies of the front and back of their supporting documentation, in compliance with the guidance published in **Field Guidance 26. Completing the *Sponsor Application* via the web-based Sponsor App is the preferred method and must be attempted first in all cases before offering the potential Sponsor application materials in alternate formats.**

- 7) Explains the roles of the following individuals:

- The **Intake Specialist**: This person is responsible for accepting the child's referral from one of ORR's Federal partner agencies and identifying the most appropriate initial placement for the child while they remain within ORR custody. The Intake Specialist will be ORR's first point of contact with a potential Sponsor and they will initiate the sponsor application process. The Intakes Specialist will transfer the case to a Division of Sponsor Administration (DSA) Federal Field Specialist (FFS) who will complete the vetting process.
- The care provider **Case Manager**: This person will be the potential Sponsor's primary point of contact for information pertaining to the child's status while in care. The Case Manager works for an ORR funded local shelter, group home, or community-based care facility where the child will reside and receive services for the duration of their stay in ORR custody. The Case Manager will not be involved in the sponsor vetting process but will be in contact with the child's parent(s) or legal guardian(s) once the child is admitted into care or within 24 hours of the placement designation, and may be in contact with the potential Sponsor to facilitate calls and provide updates on the child's status if appropriate and the potential Sponsor is an approved contact. The Case Manager will be the one responsible for identifying any additional potential Sponsors post-placement and referring them to the Division of Sponsor Administration to initiate sponsor vetting.
- The **Division of Sponsor Administration Federal Field Specialist**: Once referred to DSA, a DSA-FFS will be responsible for completing sponsor vetting and making a sponsor suitability determination. Once the potential Sponsor is transferred to the DSA-FFS, the DSA-FFS will become the potential Sponsor's primary point of contact regarding their sponsorship

application. The potential Sponsor may work with more than one DSA-FFS during this process and will be required to complete in-person vetting activities at a future date.

- 8) Asks the potential Sponsor if the child has any health conditions. If the individual discloses any health concerns that were not included in the initial referral, the Intake Specialist will document the information on the notes section for further follow-up by the DSA-FFS and DCA-FFS. The Intake Specialist will immediately alert the DCA-FFS of any new medical disclosures made during the initial screening call; the DCA-FFS will inform the child's assigned medical coordinator **within 60 minutes of receiving this information** to ensure the child receives timely assessment or treatment, if necessary.

**NOTE:** If the potential Sponsor indicates they are unable or unwilling to sponsor the child ([Step 2](#)), end the call and document this in the Sponsor Vetting Tool notes. Otherwise, proceed to [Step 9](#).

## Initiating the Sponsor Application

- 9) After completing the initial call, and receiving the digital submission of the potential Sponsor's valid government issued photo ID, the Intake Specialist conducts a sponsor profile search in the Horizon Sponsor Vetting Tool to identify any previous actual or attempted sponsorships, and to check for sponsor flags; see **Quick Glance: How to Check for Previous Sponsorship** in [UAC MAP Section 2.2.2](#).

- If no profile exists, the Intake Specialist creates a new profile for the potential Sponsor using the available information and uploads the photo ID file to the profile.
- If a profile exists, the Intake Specialist will update the profile with new information, including new flags, as applicable. The Intake Specialist will verify that the information contained in the profile matches the basic biographic info on the photo ID, and compare the new submission against previously submitted documents, noting any discrepancies as necessary.

**NOTE:** Prior to creating a new record, the Intake Specialist conducts a thorough search for the potential Sponsor's name and address in the Horizon Sponsor Vetting Tool to check if the potential Sponsor has previously applied for sponsorship, if the address was previously used for sponsorship, and to ensure that they do not create a duplicate sponsor profile. A child may have multiple potential Sponsors, but the Intake Specialist must designate one potential sponsor as the "Primary Sponsor" in the *Sponsor Information* section of the *Sponsor Assessment*; each case may only have one "Primary Sponsor" at a given time and only the Primary Sponsor will undergo active vetting until a suitability determination has been issued or the primary potential Sponsor withdraws from consideration

- 10) Concurrent with creating or updating the sponsor profile in the Horizon Sponsor Vetting Tool, the Intake Specialist notes any relevant information concerning their contact with the potential Sponsor in the DPO Notes section of the Sponsor Vetting Tool.
- 11) **Upon completion of the Authorization for Release of Information (ARI)**, the Intake Specialist informs the potential Sponsor that the Division of Sponsor Administration will assume responsibility for their application and vetting going forward. The potential Sponsor will soon be contacted by their assigned DSA-FFS, and the Intake Specialist notes that the potential Sponsor

may work with one or more DSA-FFS during their application process. The potential Sponsor will also receive contact from the care provider Case Manager with a status update on the child.

- 12) Upon completion of the ARI, the Intakes Coordination Center (ICC) automatically refers the sponsor application to the Division of Sponsor Administration via the Sponsor Vetting Tool (SVT), and the case is ready for assignment to a DSA-FFS.

## Assignment to Division of Sponsor Administration Federal Field Specialists

Once the potential sponsor has completed the ARI and provided supporting documents, the DSA-FFS Supervisor will assign the case to a DSA-FFS. Assignments are based on the DSA-FFS caseload capacity, caseload complexity, and geographical proximity to the potential Sponsor's home, among other factors.

**NOTE:** Initial assignments to a particular DSA-FFS may be overridden by the DSA-FFS Supervisor at their discretion. All DSA-FFS assignments are recorded, and their status is monitored in the Sponsor Vetting Tool.

## Transfers of Children between Care Providers or Case Managers

If a child is transferred between Care Provider Facilities or between Case Managers within the same Care Provider Facility, the same DSA-FFS remains assigned to the child's case. The DSA-FFS must be involved in the case transition between the previous and new Care Provider Facility and/or the previous and new Case Manager. The DSA-FFS must inform the potential Sponsor that the child has been transferred and that the DSA-FFS will remain the same, but the child will have a new Case Manager, either because they will be placed at a different Care Provider Facility, or because a change of staff within the same Facility.

## Sponsor Vetting

Initial sponsor vetting (**Steps 13 – 28**) is to be completed remotely utilizing video conferencing, telephone, and email, and other modalities as necessary and authorized by leadership. The DSA-FFS updates the *Sponsor Assessment* in the Horizon Sponsor Vetting Tool as new information and documents are received throughout the process. The *Sponsor Assessment* must be updated as close to real time as possible.

- 13) The DSA-FFS continues the sponsor vetting effort, resuming at the step following the last step completed by the Intakes Specialist as indicated in the sponsor profile and Sponsor Vetting Tool notes. The DSA-FFS must also notify the Division of Vetting Sponsor Vetting Branch that a potential sponsor has been identified to initiate their process.
- 14) **Within 5 business days of assignment** to the case, the DSA-FFS initiates contact with the potential Sponsor to:
  - Introduce themselves and their role in the sponsor vetting process.
  - Reconfirm the potential Sponsor's intent to pursue sponsorship of the child through the sponsor application process.
  - Confirm if the potential Sponsor requests translation or interpretation services to participate in the sponsor vetting process. If the potential Sponsor requests language services, the DSA-FFS will engage the language support hotline to assist with verbal and written communication.

- Reiterates the potential Sponsor's responsibilities during the sponsorship process, emphasizing the importance of providing complete, accurate, truthful information. They also inform the potential Sponsor of ORR's fraud prevention policies and affirm that any fraudulent information provided by the potential Sponsor may be reported to law enforcement and may result in the denial of sponsorship.
- Reiterate that ORR, its care providers, and grantees/contractors do not collect or require fees for any services related to the release of unaccompanied children from HHS custody as is specified in [UAC Policy Guide Section 5.7.1 - ORR Efforts to Prevent Fraud](#). If the potential Sponsor discloses that they may have been the victim of fraud or exploitation, the DSA-FFS reports the incident through a Significant Incident Report (SIR) and to local law enforcement as specified in [UAC Policy Guide Section 5.7.2 - Responding to Fraud Attempts](#).
- Review the Sponsor Handbook with the potential Sponsor:
  - i) Highlighting the Legal Orientation Program for Custodians Presentation (LOPC) requirements, as applicable.
  - ii) Review the importance of obtaining a *Letter of Designation of Care* for the child.
- Explain the home study requirement, if applicable, and answer any relevant questions for the potential Sponsor.
- Inform the potential Sponsor that they will be contacted by a member of the DSA ID Verification Team to schedule the potential Sponsor for their in-person sponsor vetting and ID verification appointment at a later date.
- Review the ORR DNA Testing requirement detailed in [Field Guidance 27 – DNA Testing Expansion](#), if applicable to the case, and explain the procedure for collecting samples for testing at the in-person meeting.

15) Next, the DSA-FFS reviews instructions to complete all outstanding SAP requirements with the potential Sponsor and answers any questions they may have. The DSA-FFS may assist the potential Sponsor to complete the *Sponsor Application* when necessary, as allowed by [UAC Policy Guide Section 2.2.3 – The Sponsor Application](#).

16) The DSA-FFS will explain the importance of obtaining a *Letter of Designation for Care of Minor* from the child's parent or legal guardian if the potential Sponsor is not the parent or legal guardian.

17) The DSA-FFS also reviews *Fingerprinting Instructions* (Form SAP-5) and makes the referral to schedule their fingerprinting appointment via the modality directed by ORR leadership, as applicable to the case, for the potential Sponsor, all adult HHMs, and all ACGs, following guidance detailed in the [UAC MAP Section 2.5.1 – Background Check Requirements](#).

18) The DSA-FFS conducts a sponsor search in the Horizon Sponsor Vetting Tool to verify that no duplicate sponsor entries were created by the Intake Specialist and to confirm if the potential Sponsor has previously sponsored or attempted to sponsor a child. The DSA-FFS also performs the following:

- Reviews past sponsorship records (if applicable)
- Searches HHM and ACG for past sponsorship records
- Reviews any pre-existing flags associated with the potential Sponsor, and any associated HHM, or ACG.

19) Upon receipt of the completed *Sponsor Application*, Sponsor ID and *ARI*, the DSA-FFS will begin the desk review and vetting, evaluating the submitted materials for completion and accuracy. The DSA-FFS documents the results of their review and records any flags for concerning findings, inconsistencies, or suspected fraud in the Sponsor's profile in the Horizon Sponsor Vetting Tool.

Desk review and vetting includes:

- Review of the completed *Sponsor Application*
- Review of the completed *ARI* for the potential Sponsor, all household members aged 18 years and older, and all alternate caregivers aged 18 and older.
- Review of the proof of identification for the potential Sponsor, all household members aged 18 years and older and alternate caregivers aged 18 years and older (See [UAC Policy Guide Section 2.2.4](#); [Field Guidance 26](#), [FAQ #17](#) and [footnote 1](#) for additional guidance.)
- Comparison of the submitted sponsor ID to the submitted sponsor photo to verify the identity of the individual matches to the presented proof of identity, entering a sponsor flag if they suspect the photo and ID do not match.
- Review and verification of the submitted proof of the potential Sponsor's address utilizing Google Street View and Smarty Street check, following instructions in [UAC MAP Section 2.2.4](#). Concurrently, the DSA-FFS also conducts a 1-mile radius sex offender registry search ([www.nsopw.gov](http://www.nsopw.gov)) using the potential sponsor's provided home address and documents the results in the sponsor assessment, noting any particular concerns or potential safety risk to the child identified in the results.
- Review the submitted proof of claimed relationship (See [UAC Policy Guide Section 2.2.4](#), [UAC MAP Section 2.2.4](#), [Field Guidance 27 – DNA Testing Expansion](#), and [FAQ #19 – Field Guidance 27 DNA Testing Expansion](#) for additional guidance)
- Review and verify the submitted proof of income for potential Sponsor (See [UAC Policy Guide Section 2.2.4](#); [FAQ #18 – Proof of Sponsor Income](#) for additional guidance) and confirm the provided Social Security Number (SSN) or Individual Taxpay Identification Number (ITIN) match the provided proof of income documentation, if available.
- Review any additional supporting documents provided with the initial SAP submission.
- Initiate the Home Study Request, as required under [UAC Policy Guide Sec. 2.4.2 – Home Study Requirements](#), following [UAC MAP Section 2.4.2](#) guidance. The home study must be completed, and the results must be reviewed by the DSA-FFS prior to the in-person sponsor vetting meeting ([Step 30](#)).

**NOTE:** Under the *Ms. L* Settlement Agreement, family separation cases follow a streamlined reunification process which requires confirmation of parentage/ legal guardianship and a determination of parental fitness. The above instructions do not apply to *Ms. L* cases. See [UAC Policy Guide Section 2.10.4 – Ms. L Reunification Process](#) and its corresponding [UAC MAP Section 2.10.4](#) guidance for further instruction.

20) Prior to the in-person sponsor vetting appointment, the assigned DSA-FFS completes the criminal history and public records background checks **with contractor support** for the potential Sponsor, all adult HHMs, and the ACGs following guidance in [UAC Policy Guide Section 2.5.1 – Background Check Requirements](#) and [UAC MAP Section 2.5.1.](#), including:

- Internet public records check
- National sex offender public registry search
- Child abuse/ neglect (CA/N) checks, as applicable to the case.

- State and local criminal history background check, as applicable to the case.
- Monitors the FieldPrint/ BWA Galton (ORR Digital Site) portal for FBI National fingerprint based criminal history search results

The DSA-FFS collects contractor-procured results and documents the results of all checks, including which jurisdictions were searched and the results in the Horizon Sponsor Vetting Tool Sponsor Assessment – Criminal History Background Check section, and creates a flag if appropriate according to guidance in [UAC MAP Section 2.4.1 – Assessment Criteria](#). If any check results meet ORR mandatory denial criteria under [UAC Policy Guide Section 2.7.4 – Deny Release Request](#), the DSA-FFS completes the [Suitability Determination \(Step 38\)](#) and refers the case back to the Division of Case Administration (DCA) FFS via email.

In all cases, the complete results of the ORR Required Criminal History Background Check, plus any identified flags pertaining to the potential Sponsor, HHM, or ACG are concurrently shared with the Integrity and Accountability (IAB) Division of Vetting (DoV), Sponsor Vetting Branch (SB) for review. The Division of Vetting determines, based on the provided criminal history, sponsor flag information, and actual or suspected fraud if the case warrants further investigation due to potential criminal smuggling, trafficking, or exploitation risk.

- 21) Interviews the potential Sponsor following the *Sponsor Assessment Interviewing Guidance* as specified in [UAC MAP Section 2.4.1](#) and [UAC MAP Appendix 2.4](#). The DSA-FFS updates the *Sponsor Assessment* as new information and documents are received throughout the process. If the potential Sponsor self-discloses criminal history or background checks reveal criminal history or a safety risk, the DSA-FFS creates a sponsor flag and elevates the circumstance as soon as possible to their supervisor, the Case Coordinator and includes the assigned DCA-FFS on all such communications. If sponsor fraud is suspected, the DSA-FFS follows guidance in [UAC Policy Guide Section 2.2.4](#) and [UAC Policy Guide Section 2.7.4](#), which may result in release denial.
- 22) Concurrent to public records checks, the DSA-FFS initiates consulate verification for submitted proof of identity or relationship, when applicable by engaging the Embassy Relations team: [orr\\_document\\_verification@acf.hhs.gov](mailto:orr_document_verification@acf.hhs.gov). In accordance with UAC Policy, embassy relations team must exhaust all available avenues to verify the authenticity of birth certificates submitted to establish proof of sponsor-child relationship, where claimed. All efforts to obtain verification of authenticity must be documented in the Horizon Sponsor Vetting Tool.

**NOTE:** As part of the proof of sponsor-child relationships for Category 3 unrelated cases, the care provider Case Manager interviews the child about their relationship with the potential Sponsor and may also contact members of child's family, child's caregiver in country of origin to obtain additional information concerning the nature of the potential Sponsor's relationship with the family or child. Utilizing the information gathered by the Care Provider Case Manager, the DSA-FFS will interview the potential Sponsor and potentially the Sponsor's neighbors to complete this process, as specified in [UAC MAP Section 2.2.4](#), to inform their finding that the potential Sponsor and child have a bona-fide social relationship. The Care Provider Case Manager remains responsible for fostering relationships via family sessions where no bona fide relationship exists. When no bona fide relationship exists, the care provider Case Manager must confirm with the assigned DSA-FFS that the potential sponsor has submitted their ARI, that their proof of identity document has been verified, and that there are no adverse results in their public records check and sex offender registry check before facilitating family session contact between the potential

sponsor and child. If further background check investigations produce results which suggest the potential sponsor may pose a risk to the safety or wellbeing of the child, the DSA-FFS will instruct the care provider Case Manager to immediately pause all future family sessions pending full adjudication of the potential sponsor's background investigation.

- 23) If available, the DSA-FFS schedules the potential Sponsor for the LOPC presentation and provides confirmation of their appointment. The DSA-FFS documents this in Horizon Sponsor Vetting Tool under the Sponsor Profile.
- 24) If the potential Sponsor requests assistance obtaining a *Letter of Designation of Care* from the child's parent or legal guardian, the DSA-FFS will engage the care provider Case Manager to complete this step with the family in country of origin. The DSA-FFS must coordinate their efforts to ensure that this responsibility is clearly delegated. Regardless of the outcome, the DSA-FFS is responsible for documenting all efforts to obtain the letter in the Horizon Sponsor Vetting Tool, even if unsuccessful.
- 25) If the case is referred for a home study under [UAC Policy Guide Section 2.4.2](#), the DSA-FFS reviews the home study results as soon as they are available. If the home study results in concerning findings that meet ORR mandatory denial criteria under [UAC Policy Guide Section 2.7.4](#), the DSA-FFS completes the Suitability Determination and refers the case to the DCA-FFS. See [Home Study Referral and Recommendation](#) below for additional guidance.
- 26) In the event a sponsor withdraws during the vetting process or is denied due to mandatory denial criteria prior to completing the full sponsor vetting process, the DSA-FFS will issue a Sponsor Suitability Determination ([Step 38](#)) following [UAC Policy Guide Sec. 2.7 – Recommendations and Decisions on Release](#). Next, the DSA-FFS will inform the Division of Placement Operations to assign the next most suitable sponsor, if available. If no additional suitable sponsor has been referred, the DSA-FFS requests the DCA-FFS to work with the care provider Case Manager and the Case Coordinator to identify other potential Sponsors for concurrent planning as is specified in [UAC MAP Section 2.4.1 - Assessment Criteria](#), and [UAC Policy Guide Section 3.3.2 – Long Term and Concurrent Planning](#) through structured family sessions, and ongoing conversations with the child in care. When a new potential sponsor is identified, the care provider Case Manager refers the new potential Sponsor to the Division of Placement Operations to initiate sponsor vetting starting at [Step 1](#).
- 27) The DSA-FFS documents that they have completed remote vetting and desk review and provided all appropriate reminders/ instructions to the potential Sponsor before their in-person sponsor vetting appointment in the Sponsor Vetting Tool, adding any relevant notes to the Sponsor Vetting Tool Sponsor Profile as applicable.
- 28) The Division of Vetting Sponsor Branch (IAB) provides the DSA-FFS with notice that they have completed their review of provided sponsor criminal history records, disclosures, flags, and suspected or actual document or information fraud (initiated during [Step 20](#)). Once the DSA-FFS receives notice from the Division of Vetting that they have reviewed the provided sponsor information, the DSA-FFS is clear to refer the case to the ID Verification team to schedule the in-person vetting appointment. Potential sponsors with identified or suspected findings related to criminal smuggling, trafficking, or exploitation will be referred to the U.S. Department of

Homeland Security (DHS) – Homeland Security Investigations (HSI) for further investigation and/or an interview.

## In-Person Sponsor Vetting Appointment

In-person vetting is conducted to verify the potential Sponsor's identity, validate sponsor application supporting documentation, gather additional information to inform the *Sponsor Assessment*, and confirm the validity of information provided during earlier stages in the sponsor vetting process.

Participation in the in-person vetting appointment is mandatory for Category 2 and 3 sponsors, and exemptions will only be granted to eligible Category 1 sponsors on a case-by-case basis when supported by documentation and clear justification (see [Step 32](#)). All *Ms. L* cases where the parent or legal guardian's identity and relationship to the child have been confirmed, and there is no articulable concern for child safety after release are also exempt from the in-person sponsor vetting requirement.

- 29) The ORR ID Verification Team sends the potential Sponsor a scheduling link and informs the potential Sponsor of the location and address for the in-person meeting, noting if this meeting will be conducted by a different Federal Field Specialist than the one with whom they've been working. In such cases, the ID Verification team member will provide the potential Sponsor with the name and contact info of the DSA-FFS who will conduct the in-person vetting appointment. The ID Verification Team reminds the potential Sponsor that they must bring the same [UAC Policy Guide Section 2.2.4](#)-compliant<sup>1</sup> original, unexpired, government-issued photo ID submitted with their sponsorship application to the in-person meeting.
- 30) The DSA-FFS assigned for the in-person sponsor vetting, if different from remote vetting, meets the potential Sponsor at the scheduled date, time and location at the most proximal care provider facility or DHS-HSI field office.<sup>2</sup> The in-person sponsor vetting meeting must take place in spaces that afford sufficient privacy due to the sensitive nature of information collected. Upon arrival, the DSA-FFS presents their PIV (Personal Identity Verification) badge to the potential Sponsor to confirm their identity and role as an ORR agent acting in their official capacity. The DSA-FFS initiates language services if requested by the potential Sponsor prior to initiating sponsor vetting activities. At this meeting, the DSA-FFS performs the following actions:
  - Review the completed *SAP* with the potential Sponsor, checking off items reviewed in the Sponsor Vetting Tool
  - Collect DNA samples for testing using vendor-supplied swab kit. The DSA-FFS follows sampling protocols provided by the vendor's kit instructions to ensure the sample is properly collected, free of contamination, and viable for testing.
  - Prepare the collected DNA sample for shipping following the instructions provided by the DNA testing vendor.

**NOTE:** Care provider staff and FFS must take all precautions to protect the child's PII. DNA test kits must not be labeled with any identifying information that may compromise sensitive and protected health information pertaining to the child.

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<sup>1</sup> Qualifying Category 1 cases without safety concerns where the potential Sponsor or adult HHMs are unable to meet ORR proof of identity or other documentation requirements may seek an exemption from the ORR Office of the Director to utilize foreign-issued proof of identity documents or alternate records to establish proof of address, relationship, or income on a case-by-case basis. See: [UAC Policy Guide Section 2.2.4](#), [Field Guidance 26](#), and [FAQ #18](#) for additional guidance.

<sup>2</sup> The in-person vetting appointment is distinct and separate from any interview requested by DHS-HSI. If requested of the potential Sponsor, ORR policy does not mandate that the potential Sponsor participate. Any potential Sponsor who declines a DHS-HSI interview may proceed with sponsor vetting without penalty.

- Collects and inspects original proof of identification, takes a photo of the front and back of each document, and captures a front-facing photograph of the potential sponsor to confirm the ID matches to the individual presenting for in-person vetting.
- Captures a fingerprint scan using the mobile fingerprint scanner to confirm the individual presenting for in-person vetting matches the prints captured during the background check process
- Collects, inspects, and scans any additional documents the potential Sponsor was instructed to bring to the in-person vetting appointment, if applicable.

Prior to adjourning the in-person meeting, the DSA-FFS ensures they have collected all necessary information and documents required from the potential Sponsor. **Within 24 hours of completing the in-person vetting appointment**, the DSV-FFS uploads all photos, document scans, and additional documentation collected during the in-person meeting to the Horizon Sponsor Vetting Tool and ships the collected DNA sample according to the instructions provided by the vendor.

**NOTE:** The DSA-FFS must communicate a clear and reasonable deadline to the potential Sponsor/ HHM/ ACG to provide any missing information, documentation, or correct any errors in the SAP. Failure to meet the deadline without justification may be grounds for denial of the sponsorship application.

- 31) If the submitted SAP identifies that the child may have health conditions not previously disclosed by the child, their family members, or the potential Sponsor, the DSA-FFS immediately (**within 60 minutes of disclosure**) verbally notifies the DCA-FFS who informs the care provider Case Manager, Lead Case Manager, and Program Director. Care provider staff must inform the program's Medical Coordinator and healthcare provider of all newly disclosed health information to determine the need and urgency for a health evaluation/intervention and determine appropriate medical treatment. If the care provider Case Manager is out of the office or it is after business hours, the DCA-FFS must also notify the on-call Case Manager. The DCA-FFS must contact the program and/or ORR staff for immediate notification; an email or voice message does not satisfy this requirement. If the DCA-FFS has not successfully made contact within one hour, they must also contact their DCA-FFS Supervisor.
- 32) If an additional in-person meeting is required to capture missing documentation, the DSA-FFS provides instructions to the potential Sponsor and shares a scheduling link to schedule a subsequent in-person sponsor vetting appointment. In-person sponsor vetting appointments will be rescheduled if the potential Sponsor has an acceptable reason for missing the initial appointment. Acceptable reasons include accidents, emergencies, and unforeseen circumstances outside the potential Sponsor's control. The potential Sponsor should make every effort to inform the DSA-FFS in advance if they will be unable to keep their original scheduled appointment. If a Category 2 or Category 3 potential sponsor does not have an acceptable reason to miss the mandatory in-person meeting, they will be considered a "no-show" and the DSA-FFS will complete the Sponsor Suitability Determination for Denial ([Step 38](#)).

**Exceptions to the in-person sponsor vetting requirement may be granted for extenuating circumstances, supported by clear justification, on a case-by-case basis for eligible Category 1 sponsors only.** Declining to complete a mandatory in-person sponsor vetting appointment is not

automatically grounds for denial for Category 1 sponsors. Requests for exemptions and their supporting documentation must be initiated by the ORR DSA-FFS official and uploaded to the ORR case management system. Exemptions will be elevated through ORR leadership and receive final adjudication by the ORR director or their designee. Extenuating circumstances may include, but are not limited to:

- The potential Sponsor is medically fragile, or otherwise especially vulnerable requiring specialized additional costs, equipment, care and/ or assistance to attend an in-person vetting appointment which would unnecessarily burden the potential Sponsor and prevent the child's timely release.
- The potential Sponsor lives in a remote and/ or underserved region of the country where transportation costs to attend in-person vetting are excessive, which would unnecessarily burden the potential Sponsor and prevent the child's timely release.

**NOTE:** in all eligible Category 1 cases seeking an exemption from the in-person sponsor vetting appointment, a home study will be required.

33) Following instructions provided by the DSA ID Verification team, the DSA-FFS documents their activities and the case status, and any concerns raised during the in-person meeting in *the Sponsor Assessment* located within the Horizon Sponsor Vetting Tool and documenting any new concerns with the DCA-FFS and DSA-FFS Supervisor.

- If the in-person meeting raised concerns that require an additional discretionary home study, the DSA-FFS makes the home study referral in accordance with [UAC MAP Section 2.4.2](#) guidance and instructions provided in [Table 2: Home Study Referral Roles](#), notifying the DCA-FFS in the process.
- If necessary, the DCA-FFS may contact the care provider Case Manager or Clinician and/ or speak with the child to obtain more information. The DCA-FFS will be responsible for working with care provider staff to develop a Safety Plan as described in [UAC Policy Guide Section 2.7.6 - Issues Related to Recommendations and Decisions](#) with the child and potential Sponsor, if appropriate.
- If, during the vetting process, the DSA-FFS learns information that must be reported as a Child-Level Event or Program Level-Event in accordance with [UAC MAP Section 5.8 – Reporting Child-Level Events and Program-Level Events](#), the DSA-FFS checks the UAC Portal to see whether the incident has already been reported and, if not, reports the information to the DCA-FFS assigned to the case. The DSA-FFS, DCA-FFS, and Care Provider Case Manager follow reporting protocols as are specified in UAC MAP Section 5.8, with the Case Manager recording the significant incident.
  - If a Child-Level Event exists in the UAC Portal, but the DSA-FFS has additional information on that incident, they create an *Addendum SIR*.
- If the in-person meeting raised serious concerns about the safety or viability of the potential Sponsor, the DSA-FFS requests case staffing with the DSA-FFS Supervisor and DCA-FFS.

34) Throughout the sponsor vetting and assessment process, the DSA-FFS maintains regular communication with the DCA-FFS who provides the care provider Case Manager with any updates as soon as possible and no later than the same day new information is learned. If, during the vetting process, the DSA-FFS becomes concerned that information shared regarding

the age of the child may be untruthful, such as using false documents or misrepresenting their age or identity, they report the concern and any evidence to the DCA-FFS to further investigate concerns with care provider Case Manager and the child following applicable guidance in [UAC Policy Guide Section 1.6.2 - Instructions for Age Determination](#) and its corresponding [UAC MAP Section 1.6.2](#) guidance.

## Home Study Referral and Recommendation

If a Home Study is necessary, either the DCA-FFS or the DSA-FFS is responsible for requesting it according to the table below:

**TABLE 2: Home Study Referral Roles**

Home Study Type	Home Study Reason	Request & Referral by	Request Approved by
MANDATORY	<ul style="list-style-type: none"> <li><b>TVPRA:</b> Child-related disclosure of trafficking and/ or abuse; Assessment indicates trafficking or abuse history; Referred to ORR with documentation indicating trafficking or abuse history; Child has an identified disability; Child diagnosed with disability following assessment;</li> </ul>	DCA-FFS	N/A, DCA-FFS enters HS referral without an approver
	<ul style="list-style-type: none"> <li><b>TVPRA:</b> Sponsor finding suggests child safety concern/ risk of trafficking/ abuse</li> <li><b>Foundational Rule Mandated:</b> Release to non-relative sponsoring multiple children; Release to non-relative previous sponsor of multiple children; Release of child &lt;12 years to non-relative</li> <li><b>Other ORR Mandated:</b> Previous sponsorship of 2+ children, seeking additional sponsorship of any category; Claimed bio relationship, but declined DNA testing; CAT 1 sponsor unable to provide required supporting documentation under UAC PG. Section 2.2.4 and seeking exemption; CAT 1 or CAT 2 sponsor – not biologically related; CAT 3 Sponsor</li> </ul>	DSA-FFS	N/A, DSA-FFS enters HS referral without an approver
DISCRETIONARY	<ul style="list-style-type: none"> <li><b>Prompted by child-related factor:</b> Additional information is needed to assess potential Sponsor's ability to meet child's needs; Need to educate and prepare the potential Sponsor for child's physical, medical, mental health, behavioral, or educational condition requiring additional resources to adequately provide for safety and wellbeing upon release</li> </ul>	DCA-FFS	DCA-FFS-S
	<ul style="list-style-type: none"> <li><b>Prompted by sponsor-related factor:</b> Child-safety or welfare finding during sponsor vetting; The potential Sponsor has specific</li> </ul>	DSV-FFS	DSV-FFS-S

	physical, medical, mental, or behavioral condition that may require additional resources to adequately provide for the safety and wellbeing of the child upon release; An identified omission or discrepancy between documents, records, statements or other materials presented during sponsor vetting that is material to the determination of sponsor suitability.		
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Home studies may be requested at any point during the child's length of care by either the DSA-FFS, or DCA-FFS. Mandatory home studies (TVPRA Mandatory, Foundational Rule Mandated, and Other ORR Mandated) do not require second level approval; discretionary home studies are approved by the referring FFS' supervisor. In all cases, results of the home study are material to the determination of sponsor suitability and must be received and reviewed before the DSV-FFS may issue a sponsor suitability determination.

**NOTE:** Pending updates to the ORR case management system that will decouple the *Home Study Referral* from the *Release Request*, DSA-FFS must coordinate with care provider Case Managers through the DCA-FFS to open the UAC Portal *Release Request* in order to initiate the *Home Study Referral*. Under this field guidance, opening the *Release Request* form to initiate a Home Study Referral will not count towards the sponsor application adjudication deadlines for timely release decisions contemplated within the UC Program Foundational Rule at [45 CFR 410.1205\(b\)](#); ORR's regulatory deadline for adjudicating sponsor applications and issuing release decisions is triggered upon completion of all sponsor vetting activities and receipt of all sponsor vetting materials/ records absent an unexpected delay such as the completion of a home study. A finalized home study report is considered to be one component of the complete sponsor application and vetting process.

35) Home Study results assess the potential Sponsor's ability to meet the child's needs, identify any discrepancies between the information gathered during sponsor vetting and the actual conditions within the potential Sponsor's home, and to identify potential child safety or child welfare risks if the case is approved for release. When evaluating the home study results, the DSA-FFS will pay particular attention to the following factors:

- The potential Sponsor's ability to meet the child's specific health needs (as applicable).
- The potential Sponsor's history of sponsorship or prior involvement with the ORR Unaccompanied Alien Children program (if applicable).
- Any indicators of human trafficking, human smuggling, or criminal exploitation involving any party to the sponsor application.
- Any indicators of conduct or criminality that pose a child welfare risk.

## Sponsor Assessment and Suitability Determination

36) **Within 30 business days** of completing the in-person sponsor vetting appointment, the IAB Division of Vetting, Sponsor Branch will issue a *Vetting Results Report* summarizing its findings regarding any potential open criminal investigations attached to the case. The deadline to issue the *Vetting Results Report* may be extended beyond 30 business days when warranted by the unique circumstances of the case, pending the conclusion of an open criminal investigation by a partner federal law enforcement agency where derogatory findings would have a direct child welfare implication, or when the conclusion of an open investigation is imminent.

37) Upon completion of all sponsor vetting tasks, the resolution of all outstanding requirements from the potential Sponsor, and the adjudication of all investigative results, including criminal history reports, the final IAB DoV *Vetting Results Report* findings, CA/N checks, and home study reports if applicable, the DSA-FFS completes and certifies the *Sponsor Assessment* in the Horizon Sponsor Vetting Tool.

The DSA-FFS is responsible for following procedures in the following subsections of [UAC MAP Section 2.2.4:](#)

- Guidance on Category 3 Sponsors Who are Unrelated, Have No Preexisting Relationship with the UAC or the UAC's Family, or Otherwise Trigger Concerns
- Guidance on Sponsors Who are the UAC's Adult Spouse or Partner
- Concerning Household Structures
- Evidence of being a Primary Caregiver (Category 2A sponsors who are non-grandparents/non-adult siblings only)
- Reporting Fraudulent Information and/or Documents

**NOTE:** For Category 3 cases, The DSA-FFS coordinates with the DCA-FFS, Case Coordinator, and the child's Clinician (in cases where clinical concerns are identified with the child) to determine if it is in the child's best interest to pursue release to the potential Sponsor. This must include taking the lack of preexisting relationship and the child's and/or child's family's wishes into account when the DSA-FFS makes the Sponsor Suitability Determination. In addition, the DSA-FFS determines whether the potential Sponsor's motivation for sponsorship is in good faith, absent of any trafficking, smuggling or safety concerns, and whether the potential Sponsor demonstrates the ability to provide adequate care for the child's physical and mental well-being as is specified in [UAC MAP Section 2.2.4.](#)

38) Next, the DSA-FFS completes the Sponsor Suitability Determination in the Horizon Sponsor Vetting Tool and uploads a copy of the *Sponsor Suitability Determination Checklist* to the Sponsor Profile. The DSA-FFS must include their determination for post-release services (PRS), specifying whether Level One, Level Two, or Level Three services are required in the Sponsor Suitability Determination; all released children are eligible to receive PRS. The DSA-FFS then submits the Sponsor Suitability Determination in the Horizon Sponsor Vetting Tool. This includes whether they approve the potential Sponsor for this child, any potential outstanding risks that should be mitigated, including the basis for the determination, in accordance with [UAC MAP Section 2.7 - Recommendations and Decisions on Release](#)

**NOTE:** if the DSA-FFS identifies any concerns related to suspected criminal activities associated with the potential release, they must coordinate with the DCA-FFS, IAB, and other external partners such as local law enforcement and federal partner agencies, as appropriate. Incidents of actual or suspected document or information fraud by the sponsor must be documented with a Significant Incident Report (SIR) following guidance in UAC Policy Guide [Sec. 5.8.2 – Significant Incident Reports](#) and its corresponding [UAC MAP Sec. 5.8.2](#) guidance. Once submitted, a fraud SIR will be reviewed by the SIR Triage team and routed through the appropriate channels, including IAB, for escalation.

If the DSA-FFS receives additional material information informing the suitability of a potential Sponsor after they complete the *Sponsor Assessment* and Sponsor Suitability Determination, they must update the child's *Case Review* and immediately notify the DCA-FFS. If the care provider Case Manager or DCA-FFS recommends post-release services, they do not need to have the DSA-FFS update or edit their Sponsor Suitability Determination – they may add their determination to the Release Request.

- 39) Upon completion of the Sponsor Suitability Determination, and certification of the *Sponsor Assessment*, the DSA-FFS must notify the DCA-FFS that sponsor vetting has been completed. The DSA-FFS must also update the *UAC Case Review* to document the completion of the suitability determination and the date they confirmed this status.

## Release Request

The DSA-FFS, DCA-FFS, Care Provider Case Manager, and the Case Coordinator collaborate on the *Release Request* process, which must be informed by the findings of the DSA-FFS Suitability Determination and the *Sponsor Assessment*. DCA-FFS consider DSA Suitability Determination and the totality of the UAC case for their final release decision.

- 40) **Within 1 calendar day** of receipt of the Sponsor Suitability Determination, the *Release Request* is completed by the care provider Case Manager. The submitted *Release Request* is reviewed by the Case Coordinator and the DCA-FFS.

**NOTE:** if the Case Coordinator needs additional/ missing information or requires corrections, the case is returned to the DSA-FFS. The DSA-FFS must **complete the requested correction or provide the missing information within 24 hours** in accordance with [UAC Policy Guide Section 2.7.5 – Remand Release Decision](#) and its corresponding [UAC MAP Section 2.7.5](#) guidance.

- 41) Once reviewed by the Case Coordinator, the *Release Request* is submitted to the DCA-FFS for approval. The DCA-FFS issues one of the following decisions:
  - Approve release
  - Approve with PRS (Level: 1, 2, or 3)
  - Deny Release
  - Remand Release pending additional information:
    - (1) Further Home Study Needed
    - (2) Other: \_\_\_\_\_

The Release request proceeds according to the instructions listed in Table 3, below.

TABLE 3: DCA Release Decision Process Detail

Step	Approve	Deny <sup>3</sup>	Remand
41. a)	The case proceeds to release following <a href="#">UAC Policy Guide Section 2.7.1 - Approve Release Decisions</a> and its corresponding <a href="#">UAC MAP Section 2.7.1</a> guidance or <a href="#">Section 2.7.2 Approve Release with Post-Release Services</a> .	If the <i>Release Request</i> is denied, the DCA-FFS issues the denial letter to ORR for approval, and the new referral is made to DSA ( <a href="#">Step 1</a> ) with another potential Sponsor if available. If no alternate potential Sponsor is listed, the DCA-FFS will coordinate with the care provider Case Manager to contact the child's family and engage them in the process of identifying additional potential Sponsors following concurrent planning procedures outlined in <a href="#">UAC Policy Guide Section 2.4.1 - Assessment Criteria</a> and its corresponding <a href="#">UAC MAP Section 2.4.1</a> guidance	The case remanded to the DSA-FFS to correct any deficiencies in the sponsor application and/ or to request a Home Study in accordance with <a href="#">UAC Policy Guide Section 2.7.5 - Remand Release Request</a> and its corresponding <a href="#">UAC MAP Section 2.7.5</a> guidance.
41. b)	The Care Provider Case Manager prepares the child for reunification following <a href="#">UAC Policy Guide Section 2.8 – Release from Office of Refugee Resettlement (ORR) Custody</a> and its corresponding <a href="#">UAC MAP Section 2.8</a> guidance.	ORR reviews the sponsor denial letter and if approved, notifies the potential Sponsor of the release denial following <a href="#">UAC Policy Guide Section 2.7.7 - Notification of Denial</a> and its corresponding <a href="#">UAC MAP Section 2.7.7</a> guidance.  If ORR declines approval of the sponsor denial, the case is <u>remanded</u> to the DCA-FFS with further instructions to correct any deficiencies in the case.	Once the sponsor application deficiencies are corrected, or the home study has been completed, the case resumes at <a href="#">Step 37</a> .

<sup>3</sup> A potential sponsor may appeal the determination to deny their application for sponsorship. ORR abides by the policies governing appeal denial specified at [UAC Policy Guide Section 2.7.8 – Appeal of Release Denial](#) and the procedures set for the corresponding [UAC MAP Section 2.7.8](#) guidance.

Step	Approve	Deny <sup>3</sup>	Remand
41. c)	<p>When the <i>Release Request</i> is submitted, the Case Manager remains responsible for emailing notices of pending release to the ICE Field Office Juvenile Coordinator (FOJC) and the legal services provider or attorney of record using the email template in the <a href="#">UAC MAP Section 2.7.1 - Approve Release Decisions</a>, and for generating the <i>Discharge Notification Form</i> in the UAC Portal, as is specified in UAC MAP Section 2.7.1.</p>		

Step	Approve	Deny <sup>3</sup>	Remand
41. d)	<p>The Care Provider Case Manager prepares a safety plan, as needed, to address needs the child may have after being released, as specified in <a href="#">UAC Policy Guide Section 2.7.6 Issues Related to Recommendations and Decisions</a>. The care provider Case Manager drafts the plan with input from the DCA-FFS and in conjunction with the Case Coordinator.</p> <p>Post-Release Services (PRS) referral: the care provider Case Manager makes the referral to a PRS provider as is specified in <a href="#">UAC MAP Section 2.7.2 - Approve Release with Post-Release Services</a>.</p> <p>In the event a child is aging out of care, the care provider Case Manager remains responsible for post-18 planning. The Program should follow <a href="#">UAC Policy Guide Section 1.6 - Determining the Age of an Individual without Lawful Immigration Status</a>; Section <a href="#">1.6.1 - Unaccompanied Alien Children in HHS Custody</a>; and Section <a href="#">1.6.2 - Instructions for Age Determinations</a>.</p> <p>The Case Manager continues to be responsible for all tasks assigned to the case manager in <a href="#">UAC MAP Section 2.8 - Release from ORR Custody</a>, including coordinating transportation for the child, if necessary.</p>		

## Release from ORR Custody

42) At the physical transfer from custody the care provider Case Manager or other designated member of the care provider staff will be in attendance. Release meetings are conducted at the care provider site, or an offsite location designated by the care provider.

The care provider staff or transportation staff, as applicable, are responsible for checking the approved Sponsor's identification at the time of handoff of the child to the approved Sponsor's care and, **subject to device availability**, collecting a third fingerprint scan utilizing mobile fingerprint scanners to verify the biometric identity of the approved Sponsor; **if devices are unavailable, the third fingerprint capture is not required at release.** The identification document presented by the approved Sponsor must be the same document used during the sponsorship process, If applicable, the fingerprint scan must match those captured during sponsor vetting background checks and the in-person vetting appointment. The care provider must document that they have checked the approved Sponsor's proof of identity document and take a digital image of the identification used at the time of transfer; this picture must be uploaded into the UAC Portal under Case Management> Assessments> UAC Documents **within 48 hours of the transfer of custody.**

**NOTE:** *Ms. L* cases are exempt from the requirement to present ID upon physical release of the child. *Ms. L* cases must follow [UAC Policy Guide Section 2.10.4 – Ms. L Reunification Process](#) and its corresponding [UAC MAP Section 2.10.4](#) guidance.

For all other cases, requests for exemption from the requirement to present original, matching proof of ID upon physical release of the child due to extenuating circumstances, will only be made on a case-by-case basis and must be supported by clear justification and thorough documentation. Permission to seek an exemption is approved by the ORR Project Officer or other ORR officials. Such justification must be documented and uploaded to ORR's case management system. The request for exemption must be adjudicated by the Director or their designee.

In the event the approved Sponsor fails to appear, another individual comes to pick up the child other than the approved Sponsor, the approved Sponsor fails to provide acceptable matching documentation proving their identity, or the fingerprint scan does not match earlier scans, care provider or transportation staff must immediately call the DCA-FFS or other ORR official for further instructions.