



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Refugee Resettlement | 330 C Street, S.W., Washington, DC 20201
www.acf.hhs.gov/programs/orr

FIELD GUIDANCE – March 17, 2022

RE: Field Guidance #23 – Volunteers Working with Unaccompanied Children

GUIDANCE

Field Guidance 23 outlines the requirements for volunteers working with Unaccompanied Children (UC) in the care and custody of the Office of Refugee Resettlement (ORR), including Unaccompanied Afghan Minors (UAM). This field guidance is accompanied by the ***Volunteer Agreement with the Office of Refugee Resettlement*** form, which must be completed by volunteers who are directly involved (whether in-person or virtual) with the following types of programs and facilities:

- Standard/licensed UC care provider programs
- Influx Care Facilities
- Emergency Intake Sites
- Temporary processing sites (e.g., airports) and Safe Havens for Afghan Humanitarian Parolees

General Requirements for All Volunteers (In-Person and Virtual)

- **All volunteers, including third-party volunteer service providers (for more information on third-party service providers, see page 2), must complete the required background checks, including fingerprint and Child Abuse and Neglect (CA/N) checks, according to ORR Policy Guide Section 4.3.3 prior to having direct unsupervised contact with UC.** If a volunteer has an incomplete background check result, staff must maintain line of sight and sound with children interacting with those volunteers, according to **ORR Policy Guide Section 4.4.1.**
- All volunteers working with children, except volunteers with third-party service providers, must sign the ***Volunteer Agreement with the Office of Refugee Resettlement*** before starting their volunteer work onsite.
- An organization that provides volunteers for the UC Program may sign the Volunteer Agreement on behalf of its volunteers. ORR encourages the administrators of each UC care provider program to notify their staff which volunteer organizations or individual volunteers have signed the agreement. The administrators of each UC care provider program must provide the signed ***Volunteer Agreement with the Office of Refugee Resettlement*** to their ORR Project Officer (ORR/PO) or Contracting Officer's Representative (COR), as applicable.
- Volunteers must maintain appropriate boundaries with children, as defined in the ***Volunteer Agreement with the Office of Refugee Resettlement***, and by **ORR Policy Guide Section 4.3.5 Staff Code of Conduct.**

- Volunteers who have not completed background checks may be permitted to have supervised and limited access to children if:
 - The volunteer has initiated background checks as required by ORR policy and state licensing requirements and there is no reasonable basis to believe the volunteer would have background check history that would make them ineligible to work with children in ORR custody. Individuals who refuse to initiate background checks are ineligible for access to the care provider or any access to children.
 - The volunteer who is pending a background check is under the direct supervision and control at all times of staff who have cleared background checks. **The supervising staff should have at least one year of experience in residential child welfare and not be subject to any serious or pending personnel infractions that compromise their ability to safely supervise others.**
 - The standard/licensed ORR care provider, EIS or ICF has provided their assigned ORR Project Officer (or Contracting Officer’s Representative (COR), as applicable) with a plan on how the volunteer pending background checks will be prevented from direct unsupervised access to children; justify why there is a need for the pending volunteers (e.g., effects on capacity, ability to serve children in care, etc.); and the supervision plan. The ORR Project Officer (or COR, as applicable) must approve this plan. The approved plan is maintained in the affected individual’s personnel files. Please note that the ORR Project Officer (or COR, as applicable) may also determine whether the volunteer pending background checks may be included as part of the staffing ratio requirement under **ORR Policy Guide Section 4.4.1**, if permitted by state licensing requirements and considering facility management and physical plant.
 - The volunteer has otherwise met other ORR policy requirements and other terms of the Cooperative Agreement applicable to onboarding new staff prior to having supervised access to children including but not limited to completing required training (including reporting and boundary training) and signing the ***Volunteer Agreement with the Office of Refugee Resettlement*** form.
 - The arrangement is permitted by state licensing requirements.

Requirements for Volunteers (In-Person or Virtual) with Third-Party Service Providers

The following service providers are considered third-party service providers:

- Legal Service Providers (LSPs) and attorneys of record;
- Child Advocates;
- Protection and Advocacy (P&A) organizations; and
- On-site medical and mental health professionals who are not employed directly by the care provider.

Third-party service providers are responsible for verifying the background checks of their own volunteers, in accordance with **ORR Policy Guide Section 4.3.3 Employee Background Investigations**.

Volunteers with third-party service providers are not required to complete the ***Volunteer Agreement with the Office of Refugee Resettlement***, however they are required to abide by the ORR Code of Conduct, in accordance with **ORR Policy Guide Section 4.3.5 Staff Code of Conduct**.

If you have any questions about this guidance, please contact the UC Policy Unit at UCPolicy@acf.hhs.gov.