



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

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## FIELD GUIDANCE – August 23, 2023

### RE: Field Guidance #24 – Sponsor Services Role Guidance for Selected Grantees

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## GUIDANCE

This document provides guidance to Office of Refugee Resettlement (ORR) Unaccompanied Children Program care providers participating in the Sponsor Services Initiative, regarding the responsibilities of Case Managers and the role of the new Unification Specialist positions. Sponsor services include:

- Providing potential sponsors with information and documents needed to sponsor a child;
- Providing sponsors support throughout the document,
- Coordinating the background check and vetting process;
- Conducting sponsor vetting; and
- Making recommendations regarding the sponsor’s suitability to sponsor the child.

Where this field guidance and the UC Policy Guide or UC MAP differ, participating care providers must follow the field guidance. Care providers are encouraged to reach out to their Project Officer or Contract Officer Representative with any questions. ORR will review this field guidance within 120 days.

Care providers **not** selected for the Sponsor Services Initiative will not receive assistance from Unification Specialists at this time and continue to follow policies and procedures in the UC Policy Guide and UC MAP.

### Background

ORR is working with a **limited number of care providers** to implement a *new* Sponsor Services Initiative. Under current policy, care provider case managers are responsible for most steps in the sponsor vetting process. This initiative centralizes the provision of sponsor services under one contractor to strengthen sponsor vetting practices and aims to reduce the amount of case work burden on case managers by shifting certain sponsor vetting responsibilities to the *new* Unification Specialist role. Additionally, the contractor offers in-person service if a sponsor is having difficulty with any aspect of the reunification process.

### Primary Roles and Responsibilities

The Case Manager’s role is described in the Guide to Terms and [UC Policy Guide Section 2.3.2 Case Managers](#). For this initiative, the responsibilities of the Case Manager and Unification Specialist in the sponsor vetting process are as follows:

#### QUICK REFERENCE CHART

The Unification Specialist’s role:	The Case Manager’s role:
<ul style="list-style-type: none"><li>• Initiate and maintain ongoing communication with the potential sponsor and sponsor household’s as appropriate;</li><li>• Provide direct assistance on completing the <i>Family Reunification Packet</i> and ensure provision of supporting documentation;</li><li>• Involve the sponsor in making a plan for individualized services for the child post release, as appropriate;</li><li>• Provide the sponsor with detailed information about the child’s needs, including needs that</li></ul>	<ul style="list-style-type: none"><li>• Coordinate the child’s assessments, individual service plans, and release from ORR custody for unaccompanied children;</li><li>• Maintain case files and ensure all services for children are documented;</li><li>• Forward information on potential sponsors identified by the child or parent/guardian to the Unification Specialist;</li><li>• Provide the child’s family updates on their well-being and functioning in the program;</li></ul>

The Unification Specialist's role:	The Case Manager's role:
<p>may require accommodation, in order to fully assess the sponsor's ability to provide care and services;</p> <ul style="list-style-type: none"> <li>• Complete a sponsor care plan, when necessary;</li> <li>• Discuss services that are available for the child in the sponsor's community;</li> <li>• Review identification and other government issued documents and use systems/technology to detect fraud and human trafficking indicators;</li> <li>• Ensure that information is gathered during the sponsor assessment process and any concerns are shared with the case manager, the case coordinator, and the FFS as is appropriate;</li> <li>• If applicable, share relevant information on the child with the sponsor in accordance with <a href="#">UC Policy Guide Section 2.3.2 Case Managers</a>, and in collaboration with the child and the child's clinician in a way that best serves the child's safety and well-being;</li> <li>• Conduct the sponsor assessment to analyze whether the potential sponsor can safely provide for the physical and mental well-being of the child;</li> <li>• Make a sponsor suitability assessment recommendation for the child to the Case Manager;</li> <li>• Provide the Case Manager with timely updates on the child's case and maintain case documentation in real time; and</li> <li>• Attend weekly staffings and provide weekly status updates to the child's assigned Case Manager, Case Coordinator and ORR/FFS on the progress in achieving a safe and timely release with a sponsor as well as potential challenges that may delay a release.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide the Unification Specialist with timely updates on the child;</li> <li>• Provide weekly status updates to the child on the child's case and provision of services, preferably in person;</li> <li>• Incorporate calls with the potential sponsor into the Case Manager's weekly check-ins with the child as the Case Manager deems appropriate;</li> <li>• Keep the Unification Specialist updated regularly and in real-time about information gathered on interactions between sponsor and child;</li> <li>• Inform local legal service providers and attorneys of record, other local service providers, Child Advocates, post-release and home study providers, and other federal agencies, as is applicable, of the progress of a child's case, including notification that a child may not have a potential sponsor, and any final release decisions made by the FFS);</li> <li>• Provide home study recommendations and release recommendations to the Case Coordinator and FFS; and</li> <li>• Attend weekly staffings and provide weekly status updates to the child's assigned Unification Specialist, Case Coordinator and ORR/FFS on the child's well-being as well as potential challenges that may delay a release.</li> </ul>

All information sharing between the Unification Specialist and Case Manager must protect Personal Health Information (PHI) and Personal Identifying Information (PII) as specified in UC 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 Case Manager from the Unification Specialist. Current Case Manager duties remain with the Case Manager if they are not included in the guidance below. The Sponsor Services Initiative requires close ongoing collaboration between the Case Manager and the Unification Specialist. The Case Manager must share with the child regular (and at least weekly) updates on their case received from the Unification Specialist, or as known.

## **Sponsor Service Initiative and Transfers of Children between Care Providers**

If a child transfers between care providers participating in the Sponsor Services Initiative or between Case Managers within the same care provider, they retain the same Unification Specialist, who must be involved in the handoff between the previous and new Case Managers. The Unification Specialist informs the sponsor that the child has been transferred and that the Unification Specialist will remain the same, but the child will have a new Case Manager since they will be placed at a different care provider. If the child transfers to a program that is not participating in the Sponsor Services Initiative, the Unification Specialist will no longer continue working on the case, and the new Case Manager will hold all responsibility for sponsor vetting, as outlined in the UC Policy Guide and UC MAP. The Unification Specialist and Case Manager must provide a warm handoff to the new Case Manager. The Unification Specialist must inform the sponsor they will now work with another Case Manager and provide the name of the Case Manager if they have it. The Case Manager at the new program not participating in the Sponsor Services Initiative must explain their role to the child and the sponsor.

## **Assignment of Unification Specialists**

A Unification Specialist will be assigned to each child at a selected care provider at intake, regardless of sponsor category. A Unification Specialist will also gradually be assigned to each child already at the selected care providers over the first weeks of the initiative. As soon as the Unification Specialist is assigned a case, they must upload a document titled “Primary Unification Specialist Information” to the UC Portal under “Additional Documents” with their name, phone number and e-mail address.

## **Sponsor Outreach and Communication**

While the Case Manager remains responsible for identifying potential sponsors, the Unification Specialist is responsible for initial sponsor outreach and communications. This includes the following steps:

1. The Case Manager remains responsible for working with the child and their parents or legal guardians to identify the appropriate sponsor, as is outlined in UC MAP Section 2.2.1 Identification of Qualified Sponsors.
  - When communicating with the child and their family, the Case Manager explains the child’s case will also receive a Unification Specialist responsible for most sponsor communications and sponsor vetting who will contact them. The Case Manager shares the name and contact information of the Unification Specialist if assigned.
2. Upon identifying a potential sponsor, the Case Manager enters information on the potential sponsor into the UC Case Review tab under the “Reunification tab”. The “Name” must be added to the “Sponsor” box, and all other information should be added under the “Reunification” open text box as soon as possible but not more than **4 hours** after receiving the potential sponsor’s contact information (or first thing in the morning if received after 9 pm). This information includes the potential sponsor’s:
  - Name;
  - Relationship to the child;

- Contact information;
  - Sponsor category;
  - How the Case Manager came into the knowledge; and
  - Any potential flags or other information the Unification Specialist should be aware of.
3. The Case Manager must then immediately e-mail the Unification Specialist notifying them that a potential sponsor has been added to the portal.
  4. There may be circumstances under which the Case Manager contacts the sponsor before the Unification Specialist has been able to if, for example, the child has asked to speak to the sponsor or the sponsor is the child's parent or legal guardian. In these cases, the Case Manager explains the child's case will also receive a Unification Specialist responsible for most sponsor communications and sponsor vetting, and that the Unification Specialist will contact them. If the assigned Unification Specialist is known at the time of these communications, the Case Manager shares the name of the Unification Specialist with the sponsor.
    - If in contact with the sponsor, the Case Manager asks whether the child has any health conditions. If the potential sponsor discloses any health conditions and the Unification Specialist reviews the UC Portal file and identifies that the child may have health conditions not previously disclosed by the child, their family members, or the potential sponsor, the Case Manager contacts the program's Medical Coordinator and healthcare provider to determine the need and urgency for a health evaluation/intervention, and determine appropriate medical treatment.
  5. The Unification Specialist follows procedures set forth in UC MAP Section 2.2.2 regarding initial outreach to the sponsor. The Unification Specialist contacts the potential sponsor as soon as possible, but not more than **4 hours** after receiving the contact information of the sponsor unless after waking hours. During the first successful contact or within 24 hours of contacting the sponsor, the Unification Specialist;
    - Explains the requirements of the sponsorship process, including an overview of ORR's function, principal tasks, and participants, and ORR's connection to U.S. immigration proceedings as is described in UC MAP Section 2.2.2;
    - Informs the sponsor of the unification process and the sponsor's responsibilities. In this conversation, they emphasize the timeline for returning the packet and explain ORR's expectation for the potential sponsor;
    - Sends the Family Reunification Packet to the Potential Sponsor via a link or PDF, as well as the link to the Sponsorship Application for Family Unification if they have not yet received it. The Unification Specialist also mails a copy if preferred/requested by the sponsor;
    - When describing the potential tasks and participants, the Unification Specialist explains the role of both the Unification Specialist and Case Manager:
      - The Unification Specialist explains that the role of the Unification Specialist is specifically to work with the sponsor on their application and the vetting process and that they are not involved in caring for the child; that the Case Manager's role is to care for and communicate with the child. If it is listed in the UC Portal, the Unification Specialist may share the name of the Case Manager with the sponsor. They specify that both may contact the sponsor; and

- The Unification Specialist asks whether the child has any health conditions. If the potential sponsor discloses any health conditions and the Unification Specialist reviews the UC Portal file and identifies that the child may have health conditions not previously disclosed by the child, their family members, or the potential sponsor, the Unification Specialist immediately notifies the Case Manager, Lead Case Manager, and Program Director, who contacts the program's Medical Coordinator and healthcare provider to determine the need and urgency for a health evaluation/intervention, and determine appropriate medical treatment. If the Case Manager is out of the office or it is after hours, the Unification Specialist must also update the on-call Case Manager. The Unification Specialist must make contact with the program and/or ORR staff for immediate notification. An email or voice message does not satisfy this requirement. If the Unification Specialist has not successfully made contact within one hour, they must also contact the FFS.
  - The Unification Specialist also informs the potential sponsor 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 [UC Policy Guide Section 5.7.1 ORR Efforts to Prevent Fraud](#), and if they determine the sponsor may have been the victim of fraud, the Unification Specialist reports the incident through a Significant Incident Report (SIR) and to local law enforcement as specified in [UC Policy Guide Section 5.7.2 Responding to Fraud Attempts](#).
6. As is detailed in UC MAP Section 2.2.2 Contacting Potential Sponsors, the Unification Specialist searches for the sponsor in the UC Portal. If the sponsor has previously sponsored, the Unification Specialist must select the existing record for the sponsor. If the sponsor has not previously sponsored a child, the Unification Specialist creates a new sponsor record within one calendar day of contacting the sponsor.
  7. If the case requires a secondary potential sponsor, the Unification Specialist works with the Case Manager and the Case Coordinator to identify other potential sponsors for concurrent planning as is specified in UC MAP Section 2.4.1 Assessment Criteria.
  8. The Unification Specialist schedules the Legal Orientation Program for Custodians Presentation following the steps outlined in UC MAP Section 2.2.5 Legal Orientation Program for Custodians.

### **Family Reunification Package**

The Unification Specialist is responsible for coordinating and assisting with completion of the Family Reunification Package (FRP) with both the sponsor and household members as is specified in UC MAP Section 2.2.3 *The Family Reunification Application*. This includes the following steps:

1. Upon receipt of the FRP, the Unification Specialist uploads the *Family Reunification Application (FRA)* into the UC Portal if it has not automatically been uploaded through the Sponsor Application for Family Unification.
  - If the sponsor requests help from the Unification Specialist in filling out the packet, the Unification Specialist assists with completion of the FRP, unless there are safety concerns that indicate that the sponsor should file the *FRA* without assistance based on information from both the Case Manager and information they have gathered (see UC Policy Guide

[Section 2.2.3](#)) . If there are not safety concerns, the Unification Specialist can complete the *FRA* over the phone with the Sponsor or assist the sponsor with completing the *FRA* through the Sponsorship Application for Family Unification.

- If the child transfers to another care provider not participating in the Sponsor Services Initiative before the sponsor has finished the application in the Sponsorship Application for Family Unification, the Unification Specialist must notify the sponsor that the application has been paused. They then must download a copy of the PDF version of the application and upload it to the UC Portal. The new Case Manager must then send the sponsor a PDF copy of the partially filled out application so they can use it to fill out the rest of the application.
2. The Unification Specialist also monitors the Sponsorship Application for Family Unification in real-time to see if the question on whether the child has medical issues has been completed. If the *FRA* identifies that the child may have health conditions not previously disclosed by the child, their family members, or the potential sponsor, the Unification Specialist immediately notifies the Case Manager, Lead Case Manager, and Program Director, who contacts the program's Medical Coordinator and healthcare provider to determine the need and urgency for a health evaluation/intervention, and determine appropriate medical treatment. If the Case Manager is out of the office or it is after hours, the Unification Specialist must also update the on-call Case Manager. The Unification Specialist must make contact with the program and/or ORR staff for immediate notification. An email or voice message does not satisfy this requirement. If the Unification Specialist has not successfully made contact within one hour, they must also contact the FFS.
  3. The Unification Specialist reviews the full *FRA* within **two (2) calendar days** of receiving the completed document.
  4. The Unification Specialist updates the sponsor record and conducts a search for the name(s) and addresses of household members and the adult caregiver to identify whether they have previously applied to sponsor a child. They document any previous sponsorships in the UC Portal if they are not already documented. The Unification Specialist also identifies potential flags and documents and escalates concerns using the processes specified in UC MAP Section 2.2.3. If there are existing flags or the Unification Specialist identifies an additional flag to add to UC Portal, they enter the flag and escalate it to the Federal Field Specialist as is specified in UC MAP Section 2.2.2. The Unification Specialist follows the protocols listed in UC MAP Section 5.8.2 Significant Incident Report and UC MAP 6.1 Notification of Concern to determine whether any new flags necessitate additional reporting and/or other actions.
  5. The Unification Specialist offers guidance to the sponsor on how to obtain required documentation for the Sponsor Application for Family Reunification, as is specified in UC MAP Section 2.2.4 Required Documents and Submission with the Application for Release.
  6. The Unification Specialist is responsible for collecting photo ID(s) and Authorization for Release of Information (ARI) where applicable under UC MAP Section 2.2.3 and uploading the documents into the UC Portal.



## Sponsor Vetting

The Unification Specialist vets the sponsor and must remain in ongoing communication with the Case Manager about the vetting process and any flags that arise.

1. The Unification Specialist confirms the identity of potential sponsors in accordance with UC Map Section 2.2.4 Required Documents for Submission with the Application for Release, uploads documents to the UC Documents section of the UC Portal and updates the sponsor's demographic information to ensure the accurate name and date of birth are documented. The Unification Specialist completes the Proof of Identity section of the Sponsor Assessment.
2. The Unification Specialist reviews proof of identity for adult household members as specified in UC MAP Section 2.2.4 or applicable ORR Field Guidance, uploads the documents to the UC Documents section of the UC Portal, updates the household tab of the Sponsor Assessment to ensure names and dates of birth are documented, and completes the Proof of Identity for Household Members section.
3. For the adult caregiver identified in the sponsor care plan, the Unification Specialist reviews proof of identity by uploading the documents to the UC Documents section of the UC Portal, updates the Care Plan tab of the Sponsor Assessment, ensures names and dates of birth in the potential alternative adult caregiver section are accurate and completes the documents establishing the Proof of Alternative Adult Caregiver's identity section.
4. The Unification Specialist completes the proof of address process as specified in UC MAP Section 2.2.4 Required Documents and Application for Release.
5. The Unification Specialist completes the proof of sponsor-child relationship process as specified in UC MAP Section 2.2.4 Required Documents and Application for Release.
  - As part of the proof of sponsor-child relationships for Category 3 cases, the Unification Specialist and the Case Manager jointly interview the child about their relationship with the sponsor. The Unification Specialist also conducts the interviews with the child's family, child's caregiver, and sponsor's neighbors to complete this process, as is specified in UC MAP Section 2.2.4, and to inform their assessment of the sponsor.
6. For potential Category 3 sponsors who are not related to the child, do not have an existing relationship with the child or the child's family, or other may concerns are noted, as specified in UC MAP Section 2.2.4 Required Documents and Applications for Release, the responsibilities of the Unification Specialist and Case Manager are as follows:
  - The Unification Specialist and Case Manager inform the Case Coordinator and FFS as soon as possible, or at the next weekly staff meeting of the circumstances if needed.
  - The Unification Specialist must complete the Sponsor Assessment in its entirety and complete public records and sex offender registry checks before the Case Manager may facilitate contact between the potential sponsor and the child while the child is in care. The Case Manager then facilitates regular contact between the potential sponsor, the child and the child's family while the child is in care and regularly monitors contact between the potential sponsor, the child, and their family.
  - Both the Case Manager and Unification Specialist together coordinate with the 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 Unification Specialist makes the Sponsor Suitability Recommendation and the Case Manager makes a recommendation for release. In addition, they together determine whether the sponsor's motivation for sponsorship is in good faith, absent of any potential trafficking concerns, and whether the sponsor demonstrates the ability to provide adequate care for the child's physical and mental well-being as is specified in UC MAP Section 2.2.4.

- Following the guidance laid out in UC MAP Section 2.2.4 Required Documents and Applications for Release, the Unification Specialist documents the relevant information received through this process in the Proof of Relationship section of the Sponsor Assessment, while the Case Manager includes any relevant information in the UC Case Review and Release Request.
7. The Unification Specialist is responsible for following procedures in the following subsections of UC MAP Section 2.2.4:
- Guidance on Category 3 Sponsors Who are Unrelated, Have No Preexisting Relationship with the UC or the UC's Family, or Otherwise Trigger Concerns
  - Guidance on Sponsors Who are the UC'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)
  - Missing Documentation or Incomplete FRA
  - Reporting Fraudulent Information and/or Documents
8. The Unification Specialist undertakes all steps assigned to the Case Manager in UC MAP Section 2.5 Sponsorship Assessment, including the background check requirements in MAP Section 2.5.1. Background Check Investigations.
9. The Unification Specialist also completes enhanced sponsor vetting through the True ID and Instant ID online tool. The True ID process verifies whether a sponsor's face matches their identification documents and the Instant ID process completes identify verification, links to other reports, and assists in spotting fraud.
- The Unification Specialist sends a link to the sponsor for the True ID verification process.
  - The application walks the sponsor through uploading a picture of their ID and pictures of themselves for the application. The Unification Specialist may assist with the process if the sponsor has questions.
  - The Unification Specialist receives a notification that the True ID report is ready and downloads the report. If the report indicates the ID as "yellow" (requiring further verification) or "red" (failing to match), the Unification Specialist reviews the photo and ID in the LexisNexis Portal and determines whether they agree with the designation and whether they should flag the sponsor for not having a matching ID. They may also determine the sponsor should take a new picture or whether they believe the ID matched.
  - The Unification Specialist then uploads the True ID report into UC Portal documents page.
  - The Unification Specialist enters required biological information on the potential sponsor into the Instant ID sponsor check.
- The Unification Specialist downloads the Instant ID report and uploads the report to the documents page.

10. The Unification Specialist determines whether there are any concerns about the sponsor or child that should be escalated.
  - If the Unification Specialist determines during the assessment that a sponsor or address must be flagged, the Unification Specialist adds a flag in UC Portal as is specified in UC MAP Section 2.4.1.
  - If, during the vetting process, the Unification Specialist learns information that must be reported as a SIR in accordance with UC MAP Section 5.8 Reporting Emergencies, Significant Incidents, and Program-Level Events, the Unification Specialist checks the UC Portal to see whether the incident has already been reported and, if not, follows reporting protocols as are specified in UC MAP Section 5.8. The Unification Specialist must copy the Case Manager on any SIR reports for their awareness.
  - If a SIR exists in the UC Portal but the Unification Specialist has additional information on that incident, they create an addendum SIR.
  - If, during the vetting process, the Unification Specialist becomes concerned that information the child has shared regarding their age may be untruthful, such as using false documents or misrepresenting their age or identity, they report the concern and any evidence to the Case Manager to further investigate concerns with the child following applicable procedures in UC MAP Section 1.6.2 Instructions for Age Determination.
  
11. Throughout the sponsor vetting and assessment process, the Unification Specialist maintains regular communication with the Case Manager and provides the Case Manager with any updates as soon as possible and no later than the same day new information is learned.

### **Sponsor Assessment and Sponsor Suitability Recommendation**

The Unification Specialist must complete the sponsor assessment and provide the Case Manager a Sponsor Suitability Recommendation that the Case Manager can use to inform the release recommendation.

1. The Unification Specialist follows all steps specified in UC MAP Section 2.4.1 Assessment Criteria.
  - The Unification Specialist interviews the potential sponsor based on the Sponsor Assessment Interviewing Guidance, as is specified in UC MAP Section 2.4.1 Assessment Criteria.
  - The Unification Specialist updates the Sponsor Assessment as new information and documents are received throughout the process.
  - Once all information on the sponsor is received, the Unification Specialist fills out the Sponsor Assessment, including filling out the case manager tab and completing the certification tab.
  - If the sponsor self-discloses criminal history or background checks reveal criminal history or a safety risk, the Unification Specialist elevates the circumstance, as soon as possible, to the case coordinator and FFS and includes the Case Manager on all such communications.
  
2. If the content of the background check or other information in the sponsor assessment indicates that the sponsor may be potentially unsuitable for release, the Unification Specialist works with the Case Manager and the Case Coordinator to identify other potential sponsors for concurrent planning as is specified in UC MAP Section 2.4.1.

- The Case Manager speaks to the child and their parents and family members to identify additional potential sponsors and shares the additional potential sponsor with the Unification Specialist.
3. Once the Unification Specialist has finalized the sponsor assessment, they review the information from the sponsor assessment to make a Sponsor Suitability Recommendation to the Case Manager. This recommendation includes whether they recommend approving the sponsor for this child, any potential outstanding risks that should be mitigated, including the basis for the recommendation, in accordance with UC MAP Section 2.7 Recommendations and Decisions on Release. The Unification Specialist must also include their recommendation for post-release services in the Sponsor Suitability Recommendation. The Unification Specialist then submits the Sponsor Suitability Recommendation of the UC Portal under Case Manager Assessment.
    - If the Unification Specialist receives additional information after they complete the Sponsor Assessment and Sponsor Suitability Recommendation, they must update the child's case file and notify the Case Manager.

### **Home Study Recommendations**

Both the Unification Specialist and Case Manager are responsible for identifying circumstances under which a home study is required as specified in UC Policy Guide Section 2.4.2 Home Study Requirement. If the Unification Specialist identifies the need for a home study, they must escalate that need to the Case Manager as quickly as possible and no later than one calendar day after identifying the need.

1. The Unification Specialist identifies whether:
  - The child's sponsor clearly presents a risk of abuse, maltreatment, exploitation, or trafficking, to the child based on all available objective evidence.
  - The potential sponsor is seeking to sponsor multiple children; or
  - The potential sponsor has previously sponsored or sought to sponsor a child and is seeking to sponsor additional children.
2. The Case Manager identifies whether any of the following scenarios apply to the child:
  - The child is a victim of a severe form of trafficking in persons;
  - The child is a special needs child with a disability as defined by section 3 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102);
  - 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 is 12 years or under and going to a non-relative sponsor.
3. As is specified in [UC Policy Guide Section 2.4.2 Home Study Requirement](#), in circumstances in which a home study is not required by the TVPRA or ORR policy, the Unification Specialist Case Manager and Case Coordinator together may recommend that a home study be conducted if they agree that the home study is likely to provide additional information required to determine the sponsor's ability to care for the health, safety and well-being of the child.
4. Once the Unification Specialist identifies the need for a home study, they inform the Case Manager immediately. The Case Manager must then consult with the Case Coordinator. If the

Case Coordinator agrees a home study is necessary, the Case Manager must submit the Home Study recommendation for review by the FFS.

5. The Case Manager is responsible for updating the *Release Request* to include the home study case referral. If the Case Coordinator and FFS approve the home study, the Case Manager then fills out the Home Study tab.
6. The Unification Specialist informs the potential sponsor whenever a home study is to be conducted, explains the scope and purpose of the study, and answers the potential sponsor's questions about the process as specified in [UC Policy Guide Section 2.4.2](#).

### **Release Request**

1. The Case Manager remains responsible for filling out and submitting the *Release Request* to the FFS within one calendar day of the completion of the Sponsor Suitability Recommendation as is specified in UC MAP Section 2.7 Recommendations and Decisions on Release. They use the findings from the Sponsor Assessment, the Sponsor Suitability Recommendation, any other information shared by the Unification Specialist to submit the *Release Request*.
  - As part of filling out the *Release Request*, the Case Manager is responsible for recommending post-release services when the Unification Specialist recommends it in the Sponsor Suitability Recommendation and / or Case Manager deems it appropriate. Sponsor Suitability Recommendation.
2. When the release request 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 UC MAP Section 2.7.1 Approve Release Decisions, and for generating the Discharge Notification Form in the UC Portal, as is specified in UC MAP Section 2.7.1.

### **Post-Decision-Making Steps**

1. If a Category 1, 2A, or 2B sponsor is denied, the Case Manager remains responsible for notifying the child of the denial, and schedules additional counseling as necessary in accordance with UC MAP Section 2.7.7 Notification of Denial.
2. As is specified in UC MAP Section 2.7.7 Notification of Denial, if a Category 3 Sponsor is denied, the Unification Specialist verbally informs the Category 3 sponsor of the denial and includes the Case Manager in the conversation if feasible and the Unification Specialist thinks their inclusion would be beneficial.
  - In these cases, the Case Manager remains responsible for notifying parties as are specified in UC MAP Section 2.7.4 Deny Release Request. If the Case Manager needs additional information on the reason for the denial, they can ask the Unification Specialist to provide that information.
3. The Case Manager prepares a safety plan, as needed, to address needs the child may have after being released, as specified in [UC Policy Guide Section 2.7.6 Issues Related to Recommendations and Decisions](#). The Case Manager drafts the plan with input from the Unification Specialist and in conjunction with the Case Coordinator.

4. If a release is approved with a PRS referral, the Case Manager makes the referral to a PRS provider as is specified in UC MAP Section 2.7.2 Approve Release with Post-Release Services.
5. In the event a child is aging out of care, the Case Manager remains responsible for post-18 planning as is specified in [Field Guidance 9](#). The Unification Specialist assists the Case Manager by providing a Sponsor Suitability Recommendation to help the Case Manager determine whether to attempt to discharge the youth to the potential sponsor, so long as there are no specific concerns as specified in [Field Guidance 9](#).
  - The Case Manager continues to be responsible for all tasks assigned to the case manager in UC MAP Section 2.8 *Release from ORR Custody*.

### In Reference to Other Field Guidances

In cases where other active Field Guidances temporarily alter or replace guidance in the UC Policy Guide or UC MAP, Case Managers and Unification Specialists in the Sponsor Services Initiative must reference the below instructions:

- [Field Guidance 10](#): Case managers must update the *Release Request* to note which cases are eligible for exemption under the *Release Request*. In cases where DNA collection is necessary, the Case Manager remains responsible for DNA collection from the child. The Unification Specialist is responsible for all other steps currently assigned to the Case Manager in Field Guidance 10. The Unification Specialist must still complete the Sponsor Suitability Recommendation in these cases. Since the Case Manager Assessment tab is not currently available in UC Portal for expedited cases, the Unification Specialist instead uploads their recommendation to UC Portal under the documents section. They then notify the Case Manager that the Sponsor Assessment and Sponsor Suitability Recommendation are complete.
- [Field Guidance 11](#): Case managers must update the *Release Request* to note which Category 2 cases are eligible for exemption under the *Release Request*. Unification Specialists must continue to check names in the ORR database as is specified under (2) in the instructions.
- [Field Guidance 15](#): The responsibilities assigned to the Case Manager in Field Guidance 15 are delineated as follows:
  - Unification Specialists must continue to follow ORR Policy Section 2.2.4 Required Documentation for Submission with the Application for Release for a non-sibling, closely related child.
  - In the event non-sibling, closely related children are in separate facilities, the Unification Specialists and Case Managers must together make every effort to coordinate sponsor assessments. This is the case whether or not both facilities participate in the Sponsor Services Initiative.
  - In cases where fingerprints would be waived for one child but not the other, the Case Manager and Unification Specialist must together work with the Case Coordinator to make a recommendation to the FFS whether to separate the cases for the purposes of processing.
  - Case Managers remain responsible for documenting the waiver of fingerprint requirements in all children in the family units' *Release Request* documents.