

# FIELD GUIDANCE – December 7, 2023

# RE: Field Guidance #25 – Verification of Release (VOR) Card Guidance for Selected Grantees

# **GUIDANCE**

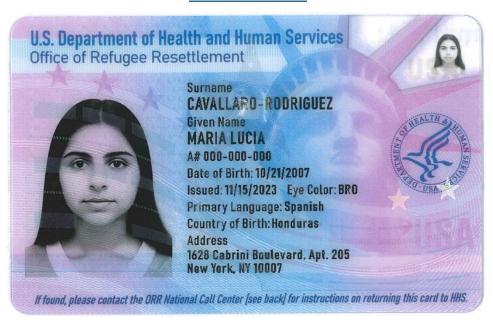
This document provides guidance to Office of Refugee Resettlement (ORR) Unaccompanied Children (UC) Program care providers participating in the pilot to issue the ORR Verification of Release (VOR) card. Where this field guidance and the UC Policy Guide or UC Manual of Procedures (MAP) differ, participating 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.

# **Background**

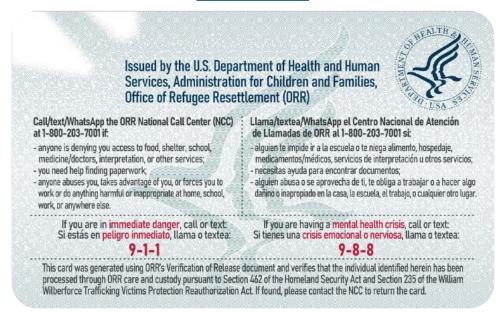
ORR is working with a **limited number of care providers** to pilot issuance of the VOR card. The VOR card is a wallet-sized, plastic card version of ORR's *Verification of Release* form. ORR provides the VOR form, which contains child-specific information, to all children upon discharge from ORR care. The purpose of the VOR form and the VOR card is to document that an individual has been released from ORR custody. All children released from piloting care providers will receive *both* the VOR form and the VOR card.

Below is an example of the VOR card:

# **VOR Card Front**



# **VOR Card Back**



The U.S. Government Publishing Office (GPO) will print and mail the VOR card to the child and sponsor's home within approximately 5 calendar days of the child's discharge from ORR custody, using the issuing care provider address as the sending address for the card. Any child exited before 12:01 am will be included on an automated daily request to GPO to print VOR cards.

# INSTRUCTIONS

#### **Procedures for Taking Photos at Intake**

Care providers must comply with the following GPO requirements when taking children's intake photos:

- Use a tripod mounted with a ring light (search "ring light tripod" for numerous options) approximately 3-4 feet from the child so their face is bright enough in the photo;
- If using an SLR camera (i.e., Nikon, Canon, etc.), the child should be approximately 4 feet from the camera; if using a computer camera, the child should be approximately 2 feet from the camera;
- Take the photo from just below the collarbone to a few inches above the head (see example);



- Ensure no shadows, glare, bright spots, red-eye, etc. appear in the photo;
- Use a clean white background with no patterns, paintings, artwork, decorations, shadows, obstructions, etc.;
- Remove hats, head coverings, or glasses (except for medical or religious reasons);
- Ensure child's hair is not covering their face;
- Only show basic, minimalist jewelry, like small earrings;
- For a baby or toddler, ensure no other person is in the photo;
- For a baby, place the baby on their back on a plain white or off-white sheet and ensure there are no shadows on the baby's face, especially if taking a picture from above; covering a car seat with a plain white or off-white sheet and photographing the child in the car seat may be helpful; and
- Children must look straight at the camera, avoid looking (or tilting their head) up or down or to the side, and may use a neutral expression or smile if they so choose.

For photo tips and acceptable and unacceptable photo examples, see the U.S. Department of State Passport Photos page.

# **Procedures for Discussing the VOR Card During Program Orientation**

As part of the orientation for all admitted children, the care provider must:

- 1. Show children a sample/template VOR form and VOR card.
- 2. Inform children they will receive their own VOR form, and other documents, upon their release, and that their VOR card will be mailed to them within approximately 5 calendar days of release.
- 3. Inform children they should keep their VOR card with them at all times to help with activities including engaging their attorneys, enrolling in school, accessing benefits and resources that their state and community may make available to unaccompanied children, picking up prescription medication from a pharmacy, obtaining a library card, attending appointments with United States Citizenship and Immigration Services (USCIS), and attending immigration court hearings.
- 4. Explain that neither the VOR form nor the VOR card provides lawful immigration status or permission to work, but rather, both are meant to document that the child was previously released from ORR custody and can be used to facilitate activities in the community.
  - Note that ORR cannot guarantee that either the VOR form or the VOR card will enable the
    child to receive all services for which they are eligible as not all entities may initially
    recognize or understand the purpose of the VOR form or VOR card.
  - Explain that if an entity does not recognize or understand the purpose of the VOR form or VOR card and needs more information, the entity should call the ORR National Call Center (NCC) at (800) 203-7001 for assistance. Note that the NCC's contact information is included on the back of the VOR card.
  - Explain that, if an entity calls the NCC to validate or authenticate a VOR card or VOR form,
    the NCC is authorized to explain the purpose of the VOR card and VOR form and to
    confirm to the requesting entity whether a specific child was released from ORR custody,
    but may not disclose any other information about the child.

5. Instruct children to call the NCC if the VOR card does not arrive within 10 calendar days, they identify errors on the VOR card, the VOR card has been lost or destroyed, or they need to update their address on the VOR card. Note that ORR will only re-issue an updated VOR card for the released child until they turn 18 years of age.

## Procedures for Issuing the VOR Form and Card

Immediately before the child physically leaves the care provider, the case manager must:

- 1. Confirm the child's full name (including spelling), date of birth, preferred language(s), eye color, country of birth, alien number ("A#"), and gender are all correct in the Initial Intakes Assessment and that the address is correct in the Sponsor Assessment.
  - If any information is incorrect, make corrections in UC Portal.
- 2. If the child's appearance has changed *significantly* from their intake photo (e.g., the child's facial features have noticeably changed) update the photo in UC Portal with a photo that meets the GPO requirements described in Procedures for Taking Photos at Intake above.
- 3. Follow procedures in **UC Manual of Procedures (MAP) Section 2.8 Release from ORR Custody** to "exit" the child from the program in UC Portal. This generates a "trigger report" for the *Verification of Release* (VOR) form.
  - Update the discharge date and time on the Discharge Notification Form in UC Portal.
  - **NOTE**: Exit the child from the program by going to the Discharge section of UC Portal and clicking on "add new" to the Program Exit form. The date of discharge will populate with the current date and the type of discharge will populate with the selections in the Discharge Notification Form. Click "save" to discharge the child from the program.
  - **NOTE**: Any child exited before 12:01 am will be included on the automated daily request to GPO to print VOR cards.
- 4. Print the VOR form for the child and sponsor and show them the exemplar VOR card; inform them:
  - They will receive the child's VOR card by mail;
  - The VOR card is a wallet-sized plastic card version of the VOR form; and
  - The child should keep their VOR card with them at all times to help with activities including engaging their attorneys, enrolling in school, accessing benefits and resources that their state and/or community may make available to unaccompanied children, picking up prescription medication from a pharmacy, obtaining a library card, attending appointments with USCIS, and attending immigration court hearings.
- 5. Inform the child and sponsor that the VOR card will be delivered to their home within approximately 5 calendar days. Emphasize again that once the VOR card arrives, the child should keep it with them at all times.
- 6. Explain that the VOR card does <u>not</u> provide lawful immigration status or permission to work, nor does ORR issue the VOR card as an official form of identification (note some states, like New York, may accept the VOR card for certain identification purposes like seeking a state or city ID). Explain that the card is intended as a portable version of the VOR form and, like the VOR form, the VOR card documents that the child was released from ORR custody. Explain the VOR card may help facilitate the activities described above to the same extent as the VOR form.

- Note that ORR cannot guarantee that either the VOR form or the VOR card will enable the
  child to receive all the services for which they are eligible as not all entities may initially
  recognize or understand the purpose of the VOR form or VOR card.
- Explain that if an entity does not recognize or understand the purpose of the VOR form or VOR card and needs more information, the entity should call the NCC at (800) 203-7001 for assistance. Note that the NCC's contact information is included on the back of the VOR card.
- Explain that, if an entity calls the NCC to validate or authenticate a VOR card or VOR form,
  the NCC is authorized to explain the purpose of the VOR card and VOR form and to
  confirm to the requesting entity whether a specific child was released from ORR custody,
  but may not disclose any other information about the child.
- 7. Instruct the child and sponsor to call the NCC if the VOR card does not arrive within 10 calendar days, they identify errors on the VOR card, the VOR card has been lost or destroyed, or they need to update their address on the VOR card. Note that ORR will only re-issue an updated VOR card for the released child until they turn 18 years of age.
- 8. Inform the child and sponsor that information about the VOR card is included in the documents accompanying the child at release.

#### Procedures if the Child does not Receive the VOR Card in the Mail

GPO will print and mail the VOR card to the child within approximately 5 calendar days of the child's discharge from ORR custody.

If the child and/or sponsor report to NCC that the VOR card has not arrived within 10 calendar days, the following must occur:

#### The NCC:

- 1. Confirms the correct mailing address with the child or sponsor and whether the child is still living with the sponsor.
- 2. Notifies the care provider that the VOR card is missing and provides the correct mailing address.
- 3. Documents that they received a call about the VOR card in the appropriate category in the applicable reporting system.

Upon notification from the NCC or directly from the child or sponsor, the care provider verifies that the released child is under 18 years of age and then:

- 1. Confirms the correct mailing address with the child or sponsor and whether the child is still living with the sponsor (unless NCC has already confirmed).
- 2. Ensures the mailing address in UC Portal matches the mailing address provided by the child or sponsor.
  - If the address in UC Portal does not match the address provided by the child or sponsor, follows the Procedures for Address Verification below then updates the address in the Sponsor Assessment in UC Portal if the child is still living with the sponsor or in the post-release address update section of the Discharge tab in UC Portal if the child no longer lives with the sponsor.

3. Contacts vorcard@acf.hhs.gov and completes the VOR Reprint Request to have a new VOR card sent to the child.

#### **Procedures for Returned Undeliverable VOR Card**

GPO will use the issuing care provider's address as the sender address when mailing the VOR card to the child. If the mailed VOR card is returned undeliverable to the issuing care provider, the following must occur:

#### The care provider:

- 1. Attempts to contact the child or sponsor.
- 2. If the care provider reaches the child or sponsor, the care provider:
  - Asks the child or sponsor to provide the correct mailing address and confirms the child is still living with the sponsor.
  - If the address in UC Portal does not match the address provided by the child or sponsor, and the child is still living with the sponsor, follows the Procedures for Address Verification below then updates the address in the Sponsor Assessment in UC Portal.
  - Contacts vorcard@acf.hhs.gov and completes the VOR Reprint Request to have a new VOR card sent to the child.
  - If the sponsor reports the child no longer lives with them, the care provider:
    - Asks for the child's correct mailing address
    - Tells the sponsor it is important to share any safety concerns regarding the child's living situation to ensure the child's well-being. If the sponsor shares any safety concerns, follows mandatory reporting and Notification of Concern (NOC) requirements as described in UC Policy Guide Section 6.8.6 Notifications of Concern and UC MAP Section 6.
    - Attempts to contact the child to confirm the new mailing address before following the Procedures for Address Verification below and updating the address in the post-release address update section of the Discharge tab in UC Portal and contacting vorcard@acf.hhs.gov and completing the VOR Reprint Request to have a new VOR card sent to the child.
- 3. If the care provider cannot reach the child or sponsor (after reasonable attempts), the care provider takes the following action:
  - If the child is receiving PRS, asks the PRS provider to continue follow up attempts to contact the child and sponsor.
  - If the child is not receiving PRS, asks the NCC to continue follow up attempts to contact the child and sponsor.
  - If there are safety concerns, follows mandatory reporting and NOC requirements as described in UC Policy Guide Section 6.8.6 Notifications of Concern and UC MAP Section 6.

# **Procedures for Correcting Errors on VOR Card**

If the child and/or sponsor report to NCC that the VOR card has errors, the following must occur:

#### The NCC:

- 1. Obtains the information regarding the error, e.g., what information is incorrect on the VOR card and how to correct it.
- 2. Notifies the care provider.
- 3. Documents that they received a call about the VOR card in the appropriate category in the applicable reporting system.

Upon notification from the NCC or directly from the child or sponsor, the care provider verifies that the released child is under 18 years of age and then:

- 1. Obtains the information regarding the error, e.g., what information is incorrect on the VOR card and how to correct it (unless NCC has already provided).
- 2. Determines whether the reported error requires a correction in UC Portal and whether there are any concerns related to the request.
  - Examples of concerning situations that may need FFS involvement include a child or sponsor requesting to correct a name or birthday that is *substantially* different from their originally provided name or birthday (simply addressing a typo on a birthday, such as correcting from 04/10/2009 to 10/04/2009 is not considered substantially different).
- 3. Discusses the request and any concerns with the FFS who approved the release (if the FFS who approved the release is not available, the care provider should contact the FFS Supervisor; if the FFS Supervisor is not available, the care provider should elevate the concern to a Field Manager).
  - For tender-aged children (children 12 years of age or younger), obtains FFS approval (or FFS Supervisor approval if FFS is not available) to correct the information in UC Portal.
- 4. If appropriate per consultation with FFS/FFS Supervisor (and with FFS/FFS Supervisor approval for tender-aged children), corrects the information in UC Portal.
  - If notification occurs more than 45 calendar days after discharge, the care provider contacts uachelpdesk@ap-in.com to request the correction in UC Portal.
- 5. Contacts **vorcard@acf.hhs.gov** and completes the VOR Reprint Request to have a new VOR card sent to the child.

#### **Procedures for Lost or Destroyed VOR Card**

If the child and/or sponsor contact the NCC to report the VOR card was lost or destroyed, the following must occur:

#### The NCC:

- 1. Notifies the care provider.
- 2. Documents that they received a call about the VOR card in the appropriate category in the applicable reporting system.

Upon notification from the NCC or directly from the child or sponsor, the care provider verifies that the released child is under 18 years of age and then:

 Contacts vorcard@acf.hhs.gov and completes the VOR Reprint Request to have a new VOR card sent to the child.

# **Procedures for Updating VOR Card Address**

If the child and/or sponsor contact the NCC to update the address on the VOR card, the following must occur:

#### The NCC:

- 1. Obtains the correct address and confirms the child is still living with the sponsor.
- 2. Notifies the care provider.
- 3. Documents that they received a call about the VOR card in the appropriate category in the applicable reporting system.

Upon notification from the NCC or directly from the child or sponsor, the care provider verifies that the released child is under 18 years of age and then:

- 1. Follows the Procedures for Address Verification below then updates the address in the Sponsor Assessment in UC Portal if the child is still living with the sponsor or in the post-release address update section of the Discharge tab in UC Portal if the child no longer lives with the sponsor.
  - If notification occurs more than 45 calendar days after discharge; the care provider contacts uachelpdesk@ap-in.com to request the correction in UC Portal
- 2. Contacts vorcard@acf.hhs.gov and completes the VOR Reprint Request to have a new VOR card sent to the child.

## **Procedures for Address Verification**

Before updating the address in the Sponsor Assessment or in the post-release address update section of the Discharge tab in UC Portal, the care provider:

- 1. Contacts the PRS provider (if the child is receiving PRS) to confirm the child receives PRS at that address and, if applicable, to notify PRS of a new reported address.
- Conducts an address search in UC Portal to determine whether the address has been used for
  previous sponsorships and there are any concerns associated with the address. If there are
  previous flags for the address, assesses whether those issues apply to the current sponsor. If there
  are safety concerns, follows mandatory reporting and NOC requirements as described in UC Policy
  Guide Section 6.8.6 Notifications of Concern and UC MAP Section 6...
- Conducts a sex offender registry check of the address via the U.S. Department of Justice National Sex Offender Public Website. If there are safety concerns, flags the address, follows mandatory reporting and NOC requirements as described in UC Policy Guide Section 6.8.6 Notifications of Concern and UC MAP Section 6.
- 4. Enters the address into <a href="https://www.smarty.com/products/single-address">https://www.smarty.com/products/single-address</a> to confirm the address is classified as residential under the RDI (Residential Delivery Indicator) category and that the address is not classified as P (post office box) under the Record Type category.
- 5. Confirms the address is a valid address in Google Maps and in Google Earth (check the camera view to ensure it is pointing at the address and not across the street or adjacent). Note: Google Earth will show apartment buildings but not individual apartments. As a result, errors may occur

when looking up a complete address with apartment number. In such instances, review the address without the apartment number.

- 6. If the address is not residential/a valid address:
  - Alerts the FFS. The FFS may conduct a quality control review of releases with the help of the CFS or identify a trend in problems at the program.
  - If the care provider cannot reach the child or sponsor (after reasonable attempts by phone and email), the care provider takes the following actions:
    - o If the child is receiving PRS, asks the PRS provider to continue follow up attempts to contact the child and sponsor.
    - If the child is not receiving PRS, asks the NCC to continue follow up attempts to contact the child and sponsor.
    - If there are safety concerns, follows mandatory reporting and NOC requirements as described in UC Policy Guide Section 6.8.6 Notifications of Concern and UC MAP Section 6.