



ADMINISTRATION FOR
CHILDREN & FAMILIES

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FIELD GUIDANCE – Revised May 20, 2024 (First Issued 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 potential sponsors support throughout the document,
- Coordinating the background check and vetting process;
- Conducting sponsor vetting; and
- Making recommendations regarding the potential 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.

As part of our phased approach, care provider programs are being gradually on-boarded to the Sponsor Services initiative over the next year. Care providers **not** yet enrolled in the Sponsor Services Initiative will not receive assistance from Unification Specialists and must continue to follow policies and procedures in the UC Policy Guide and UC MAP. At this time, ORR anticipates that all care provider programs will be enrolled in the Sponsor Services Initiative by **02/17/2025**, at which point UC Policy Guide and UC MAP will be revised to incorporate this guidance.

Background

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, shifting certain sponsor vetting responsibilities to the contractor Unification Specialist role. The Sponsor Services Initiative aims to strengthen sponsor vetting practices, prioritize child welfare, ensure the safe reunification of children in ORR care, and reduce the amount of case work burden on case managers. Additionally, the contractor offers in-person service if a potential 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:

Table 1: QUICK REFERENCE CHART: Unification Specialist and Case Manager Roles

The Unification Specialist’s role:	The Case Manager’s role:
<ul style="list-style-type: none">• Initiate and maintain ongoing communication with the potential sponsor and sponsor’s household, as appropriate;• Provide direct assistance on completing the <i>Family Reunification Packet (FRP)</i> and ensure provision of supporting documentation;	<ul style="list-style-type: none">• Verify if the child has a birth certificate, escalate to the FFS if not;• Coordinate the child’s assessments, individual service plans, and release from ORR custody for unaccompanied children;• Maintain case files and ensure all services for children are documented;

The Unification Specialist's role:	The Case Manager's role:
<ul style="list-style-type: none"> • Involve the sponsor in planning for individualized services for the child post release, as appropriate; • Provide the potential sponsor with detailed information about the child's needs, including needs that may require accommodation, to fully assess the sponsor's ability to provide care and services; • Complete a sponsor care plan, when necessary; • Discuss services that are available for the child in the potential sponsor's community; • Review identification and other government issued documents and use systems/technology to detect fraud and human trafficking indicators; • Ensure that all information, including any newly disclosed medical information concerning the child, is gathered during the sponsor assessment process and reported to the Case Manager and recorded in UC Portal in a timely manner; • Elevate all concerns and issues, including newly disclosed medical information about the child, ensure these disclosures are shared with the Case Manager, the Case Coordinator, and the FFS in a timely manner; • If applicable, share relevant information on the child with the potential sponsor in accordance with UC Policy Guide Section 2.3.2 Case Managers, and in collaboration with the child and the child's clinician in a way that best serves the child's safety and well-being, and in collaboration with the child and the child's clinician in a way that best serves the child's safety and well-being; • Conduct the sponsor assessment to analyze whether the potential sponsor can safely provide for the physical and mental well-being of the child; • Make a sponsor suitability assessment recommendation for the child to the Case Manager; • Provide the Case Manager with timely updates on the child's case and maintain case documentation in real time via email, phone, and updates in the Reunification section of the UC Case Review; and 	<ul style="list-style-type: none"> • Forward information on potential sponsors identified by the child or parent/guardian to the Unification Specialist; • Provide the child's family updates on their well-being and functioning in the program; • Provide the Unification Specialist with timely updates on the child; • Collect newly disclosed health information from the child, monitor the UC Portal for additional disclosures reported by the Unification Specialist, and follow up on care and treatment plans with the UC Program Medical Coordinator and the child's health care provider on a timely basis; • Provide weekly status updates to the child on the child's case and provision of services, preferably in person; • Incorporate calls with the potential sponsor into the Case Manager's weekly check-ins with the child as the Case Manager deems appropriate; • Keep the Unification Specialist updated regularly and in real time about information gathered on interactions between the potential sponsor and child; • 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 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); • Provide home study recommendations and release recommendations to the Case Coordinator and FFS; and • 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.

The Unification Specialist's role:	The Case Manager's role:
<ul style="list-style-type: none"> 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. 	

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 potential 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 ensure the continuity of services and provide a direct, collaborative, and seamless transfer to the new Case Manager. The Unification Specialist must inform the potential sponsor they will now work with another Case Manager and provide the name and contact information of the Case Manager. The Case Manager at the receiving care provider that is not participating in the Sponsor Services Initiative must explain their role to the child and the potential sponsor.

Assignment of Unification Specialists

To the greatest extent possible, a dedicated Unification Specialist is assigned to specific Case Managers to ensure clear communication and case processing. At intake, a Unification Specialist is assigned to each child at a selected care provider, regardless of sponsor category. 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. The document type should be listed as "Other."

Sponsor Outreach and Communication

The Case Manager remains responsible for identifying potential sponsors during the child’s intake. The Case Manager then refers the case to the Unification Specialist, who will make initial contact with potential sponsors. The Unification Specialist is also responsible for sending the FRP to the potential sponsor, providing technical assistance, and all subsequent communications for sponsor vetting purposes. Steps taken by the Case Manager and the Unification Specialist include:

1. The Case Manager begins the process by working with the child and their parents or legal guardians to identify the appropriate potential sponsor, or sponsors, as is outlined in UC MAP Section 2.2.1 - Identification of Qualified Sponsors.
 - Once a potential sponsor or sponsors are identified, the Case Manager records their name and contact information in the UC Portal according to the following table:

Table 2: QUICK REFERENCE CHART: Sponsor Record Entry Schedule and Location

Day Sponsor Identified After Intake	Entry into UC Portal	Person Responsible
Day 1 – 5	<i>UC Assessment - Additional Information Section</i>	Case Manager
Day 6 and beyond	<i>UC Case Review</i>	Case Manager

- The Case Manager contacts the potential sponsors and confirms the following:
 - The potential sponsor’s intent to sponsor the child;
 - Inquire about other potential sponsors in the United States who are related and or connected to the child’s family, including extended family members and family friends; and
 - Obtain or request assistance to obtain contact information for all other potential sponsors identified to support concurrent planning (UC Policy Sect. 3.3.2 - Long Term and Concurrent Planning), as well as expansive resourcing of potential sponsors, as specified in UC Policy Section 2.2.1
- Once the Case Manager has recorded contact information from all identified potential sponsors, as specified in Table 1 - and their contact information is entered into the Sponsor Information tab in UC Portal, the Case Manager refers the case to the Unification Specialist, who is responsible for initiating contact to confirm their intent to sponsor the child and obtain a picture copy of the potential sponsor’s government-issued ID. The Unification Specialist promptly records the demographic and contact details for the potential sponsor in the Sponsor Information tab of UC Portal. If the potential sponsor does not have a government-issued ID at the time the Unification Specialist contacts them, they should still enter their demographic information in UC Portal. However, it is crucial for the Unification to emphasize to the potential sponsor that the proof of identity document will be required prior to the release of the child. Entering the sponsor information initiates the sponsor vetting process, and thus must be completed as soon as practical but **not more than 4 hours after receiving the information, or the next morning if received after 9 pm.**

During initial contact with the potential 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 United States

immigration proceedings as described in UC MAP Section 2.2.2 - Contacting Potential Sponsors.

- Explains the Unification Specialist role, establishing that they will be responsible for all sponsor communications and sponsor vetting. The Unification Specialist provides their contact information to the potential sponsor.
- Asks whether the child has any health conditions. If the potential sponsor discloses that the child has any health conditions, the Unification Specialist documents that the child may have undisclosed health conditions in the UC Portal file and notifies the Case Manager. The Case Manager contacts the program's Medical Coordinator and health care provider to determine the need and urgency for a health evaluation/intervention and determine appropriate medical treatment.
- If the potential sponsor does not have an ID, the Unification Specialist offers guidance to potential sponsors on how to obtain the needed documentation. (See UC MAP Section 2.2.4 – Required Documents for Submission with the Application for Release.)

NOTE: in cases where the potential sponsor indicates that they will require additional assistance obtaining their identification, the Unification Specialist must coordinate with the potential sponsor's home country consulate as soon as possible to retrieve identification and avoid delays.

As detailed in UC MAP Section 2.2.2, the Case Manager first searches for the potential sponsor in the UC Portal. If the potential sponsor has previously sponsored a child, the Case Manager must select the existing record for the sponsor. If the potential sponsor has not previously sponsored a child, the Case Manager creates a new sponsor record.

To create a new potential sponsor's profile, the Case Manager must click on the "Add Sponsor" tab and input the following information in the Sponsor Demographic Information Tab:

- Sponsor's name
- Sponsor's date of birth
- Sponsor's country of birth
- Sponsor's primary phone number
- Back-up phone number where the sponsor may be reached
- Sponsor's email address

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 UC Portal.
 4. Following receipt of sponsor information from the Case Manager, the Unification Specialist follows procedures set forth in UC MAP Section 2.2.2 to begin the sponsor vetting process. The Unification Specialist contacts the potential sponsor as soon as possible, but not more than **4 hours** after receiving the contact information of the potential sponsor unless after waking hours. During the first successful contact or within 24 hours of contacting the potential sponsor, the Unification Specialist:
 - Reviews the requirements of the sponsorship process with the potential sponsor, 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 potential sponsor of the unification process and the potential sponsor’s responsibilities. In this conversation, they emphasize the timeline for returning the packet and explain ORR’s expectation for the potential sponsor, specifically mentioning the importance of providing complete, honest, and accurate information as fraudulent information may be reported to law enforcement and could result in the denial of sponsorship;
 - Sends the Family Reunification Packet to the potential sponsor via a link to the Sponsor Online Application for Family Unification (also referred to as the Sponsor Online Application) or PDF according to the preferences of the potential sponsor Alternatively, the Unification Specialist may mail a hard copy if preferred/requested by the potential sponsor. Whenever practical, it is recommended that the potential sponsor complete their FRP and Sponsor Application for Family Unification via the Sponsor Online Application for greater efficiency and data tracking;
 - 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 potential 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. The Unification Specialist may share the name of the Case Manager with the potential sponsor if the Case Manager’s name is listed in the UC Portal. The Unification Specialist specifies that both the Case Manager and Unification Specialist may contact the potential 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 (within 60 minutes of disclosure) verbally notifies the Case Manager, Lead Case Manager, and Program Director, who contacts the program’s Medical Coordinator and healthcare provider. The Case Manager notifies the medical 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 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 contact 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 potential 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.
5. 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.
 6. 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 Packet (FRP) with both the potential 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, form FRP-3)* into the UC Portal if it has not automatically been uploaded through the Sponsor Online Application for Family Unification.
 - If the potential sponsor requests help from the Unification Specialist in filling out the packet or the Sponsor Online Application for Family Unification (also referred to as the Sponsor Online Application), the Unification Specialist assists with completion of the FRP, unless there are safety concerns that indicate that the potential sponsor should file the FRA (a component of the FRP) 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 potential sponsor or assist the potential sponsor with completing the *FRA* through the Sponsorship Application for Family Unification. Digital signatures on FRP forms are acceptable.
 - If the child transfers to another care provider not participating in the Sponsor Services Initiative before the potential sponsor has finished the application in the Sponsorship Application for Family Unification, the Unification Specialist must notify the potential sponsor that the application has been paused. ORR temporarily pauses cases during transfers to ensure seamless transition of the case from a Sponsor Services site to a non-Sponsor Services site. The Unification Specialist 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. Transfers must be completed within 72 hours of approval and sponsor vetting activities must resume within 24 hours of physical transfer of custody of the child to the new care provider program.

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 (within 60 minutes of disclosure) verbally notifies the Case Manager, Lead Case Manager, and Program Director, who contacts the program's Medical Coordinator and healthcare provider. The Case Manager notifies the medical 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 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 contact 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 **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 potential sponsor on how to obtain required documentation for the Sponsor Family Reunification *Application (form FRP-3) or the Sponsor Online Application for Family Unification*, as is specified in UC MAP Section 2.2.4.
6. The Unification Specialist is responsible for collecting photo ID(s) and *Authorization for Release of Information (ARI) (form FRP-2)* where applicable under UC MAP Section 2.2.3 and uploading the documents into the UC Portal.

Sponsor Vetting

The Unification Specialist vets the potential 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, uploads documents to the UC Documents section of the UC Portal and updates the potential 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, 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. Certain categories of sponsors must receive a fingerprint-based FBI national criminal background check, while other categories of sponsor may be exempt from this requirement if they meet certain criteria specified in UC MAP Sec. 2.5.1 Background Check Requirements. In the event fingerprints are required by policy (e.g. the sponsor is category 2B or 3, the child is vulnerable, or high risk, a home study is required, or the sponsor's public records background check is not cleared – see UC MAP Section 2.5.1 for complete criteria), the Unification Specialist assists the potential sponsor, adult household member(s), and/or the adult caregiver in scheduling a fingerprint appointment at a digital fingerprint site to **occur within 3 business days** of receiving the signed Authorization for Release of Information (ARI) and government-issued photo ID (see UC MAP Appendix 2.13 - Fingerprinting Guidance).
4. The Unification Specialist updates the Family Reunification and Background Checks sections of the UC Case Status page in the UC Portal. The updates must be completed as all applicable information is received and when the various activities in the Case Status page have been completed.
5. The Unification Specialist reviews proof of identity for the adult caregiver identified in the care plan 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.
6. The Unification Specialist completes the proof of address process as specified in UC MAP Section 2.2.4.
7. The Unification Specialist and Case Manager both complete the proof of sponsor-child relationship process as specified in UC MAP Section 2.2.4.
 - The Unification Specialist gathers proof of relationship between the child and a potential sponsor to determine the appropriate sponsor category and establish the prior relationship between the child and the potential sponsor and/or the child's family with the potential sponsor.
NOTE: if the child does not have a birth certificate, the Case Manager must elevate the case to the FFS.
 - The Case Manager performs the following actions in UC Portal:
 - i. Uploads the document(s) establishing proof of relationship to the UC Documents Section;
 - ii. Completes the Relationship to Child tab of the *Sponsor Assessment*; and
 - iii. Updates the UC Case Status page with the date the proof of relationship assessment was completed

NOTE: the List of Acceptable Proof of Relationship Documents located in UC MAP Section 2.2.4 provides guidance on the forms of evidence needed to verify the claimed relationship between the potential sponsor and the child.

- For Category 3 unrelated potential sponsors, the Unification Specialist will gather as many documents as needed to prove a bona fide social relationship with the child and/or the child's family prior to migration to the United States.
8. For Category 3 potential sponsors who are not related to the child, do not have an existing relationship with the child or the child's family, or for whom other concerns are noted, as specified in UC MAP Section 2.2.4, 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.
 - As part of the proof of sponsor-child relationships for Category 3 unrelated cases, the Case Manager interviews the child about their relationship with the potential sponsor. The Case Manager also conducts interviews with the child's family, child's caregiver, and sponsor's neighbors to complete this process, as specified in UC MAP Section 2.2.4, to inform their finding that the potential sponsor and child have a bona-fide social relationship.
 - 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.
 - The Case Manager coordinates 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, the Case Manager determines whether the potential sponsor's motivation for sponsorship is in good faith, absent of any trafficking 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 UC MAP Section 2.2.4. The Case Manager's Release Request must be informed by the findings of the Sponsor Suitability Recommendation and the Sponsor Assessment, completed by the Unification Specialist.
 - Following the guidance laid out in UC MAP Section 2.2.4, 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.
9. 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

- Specifically, completing the Sponsor Assessment in its entirety, obtaining the potential sponsor’s ID, and completing the public records check and sex offender registry check.
 - 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
10. 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.
11. The Unification Specialist also completes enhanced sponsor vetting through the LexisNexis True ID and Instant ID online tool. The True ID process verifies whether a potential 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 potential sponsor for the True ID verification process.
 - The application walks the potential 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 potential 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 potential sponsor for not having a matching ID. They may also determine the potential 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.
12. The Unification Specialist determines whether there are any concerns about the potential sponsor or child that should be escalated, and in those instances, they elevate those concerns to the Case Coordinator and FFS immediately. Potential concerns that warrant elevation include, but are not limited to:
- If the Unification Specialist determines during the assessment that a potential 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.

13. 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.

14. The Unification Specialist shall continuously update the Additional Information open text box. This box is found in the Sponsor Information section under the Care Plan tab of UC Portal. Updates should be completed for the following circumstances:

- The Unification Specialist receives required or relevant information during the reunification process;
- To give updates on pending items during the reunification process so that the Case Manager is aware and able to provide updates to the child; or
- The Unification Specialist receives additional information from other sources. When adding these updates in the Sponsor Information > Care Plan > Additional Information open text box, please ensure new entries are made at the top of the text box field, displaying the notes in reverse chronological order (newest to oldest). NOTE: do not delete previously entered information when updating the Care Plan > Additional information section.

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;
 - The Unification Specialist interviews the potential sponsor based on the Sponsor Assessment Interviewing Guidance, as is specified in UC MAP Section 2.4.1. The Unification Specialist updates the Sponsor Assessment as new information and documents are received throughout the process.
 - Once all information on the potential sponsor is received, the Unification Specialist fills out the Sponsor Assessment in the Sponsor Information section of the UC Portal, including filling out the Case Manager Assessment tab and completing the certification tab.
 - If the potential 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 potential sponsor may be 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.
 - If the Case Manager identified other potential sponsors using the “snowball method” during initial outreach to the child’s family and/or guardian(s), the Unification Specialist will coordinate with the Case Manager to identify which additional potential sponsors to prioritize for sponsor vetting under concurrent planning guidelines.
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 potential 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 in 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.
 - If the care provider recommends post-release services, they do not need to have the Unification Specialist update or edit their Sponsor Suitability Recommendation – they may add their recommendation to the Release Request.
4. When the Unification Specialist has completed all their sponsor assessment and vetting tasks, the Unification Specialist follows guidance in UC MAP Section 2.7 documenting any concerning findings, including any mitigating actions taken, and enter their findings in the Sponsor Information > Sponsor Assessment > Case Manager Assessment tab.
5. Upon completion of the Sponsor Suitability Recommendation, the Unification Specialist must email the Case Manager to notify them that sponsor vetting has been completed. The Unification Specialist must also add an update to the UC Case Review to document the completion of the suitability recommendation and the date the confirmation email was sent to 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 determines whether:
 - The child’s potential 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 concurrently sponsor two or more children **and at least one of the children is unrelated to the potential sponsor**; or
 - The potential sponsor has previously sponsored two or more children and is now seeking to sponsor one or more additional children.
2. The Case Manager determines whether:
 - 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 under Discretionary Home Studies in UC Policy Guide Section 2.4.2 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 may provide additional information to determine the potential 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](#).
 7. The Case Manager ensures the Home Study provider is aware of and includes the Unification Specialist in all recommendations, communications, and decisions and the Unification Specialist is included in Home Study addendums and qualifications.

Release Request

- 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. 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.
 - The Case Manager shall include the assigned Unification Specialist when sending the Release Request email to the FFS and Case Coordinator.

3. 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. If the FFS determines that outstanding issues require a remand release decision, the FFS documents the date of the remand in the Release Request with an explanation and identifies which party is responsible for addressing the outstanding issue.
 - If the issue is sponsor-related, the Unification Specialist must address the outstanding issue in collaboration with the care provider and FFS.
 - If the issue is related to the child in care, then the care provider should work to address the issue in collaboration with the FFS, keeping the Unification Specialist informed as needed.

Post-Decision-Making Steps

1. If a Category 1, 2A, or 2B potential sponsor is denied, the denial notice will be provided in writing by the ORR Office of the Director, per UC MAP 2.7.7 - Notification of Denial. 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.
2. As is specified in UC MAP Section 2.7.7 I, if a Category 3 potential sponsor is denied, the Unification Specialist verbally informs the Category 3 sponsor of the denial and documents this step in UC Portal under the Case Review section. The Unification Specialist may include the Case Manager in the conversation if feasible and the Unification Specialist thinks their inclusion would be beneficial.
 - In Category 3 sponsor denials, the Case Manager remains responsible for notifying other parties as are specified in UC MAP Section 2.7.4 - Deny Release Request, including the legal services provider, the attorney of record, etc. 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 Post-Release Services (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. 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.
 - 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*.