



U.S. DEPARTMENT OF HOMELAND SECURITY **OFFICE OF INSPECTOR GENERAL**

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March 25, 2025

FINAL REPORT

ICE Cannot Effectively Monitor the Location and Status of All Unaccompanied Alien Children After Federal Custody





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U.S. Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

March 25, 2025

MEMORANDUM FOR: Todd M. Lyons
Acting Director
U.S. Immigration and Customs Enforcement

FROM: Joseph V. Cuffari, Ph.D.
Inspector General

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SUBJECT: *ICE Cannot Effectively Monitor the Location and Status of All Unaccompanied Alien Children After Federal Custody*

Attached for your action is our final report, *ICE Cannot Effectively Monitor the Location and Status of All Unaccompanied Alien Children After Federal Custody*. We incorporated the formal comments provided by your office.

The report contains four recommendations aimed at improving ICE's ability to monitor the location and status of unaccompanied alien children. Your office concurred with all four recommendations. Based on information provided in your response to the draft report, we consider recommendations 1 through 4 open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions. Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please contact me with any questions, or your staff may contact Craig Adelman, Acting Deputy Inspector General for Audits, at (202) 981-6000.

Attachment



DHS OIG HIGHLIGHTS

ICE Cannot Effectively Monitor the Location and Status of All Unaccompanied Alien Children After Federal Custody

March 25, 2025

Why We Did This Audit

Each year, hundreds of thousands of UACs enter the United States illegally. Public concern for the safety of UACs has continued as the U.S. media has reported on trafficking, exploitation, forced labor, and other criminal activities. ICE is responsible for managing and monitoring the immigration cases of these children once they are released from DHS' custody. We conducted this audit to determine ICE's ability to monitor the location and status of UACs once released or transferred from DHS and HHS' custody.

What We Recommend

We made four recommendations to improve ICE's ability to monitor the location and status of all UACs.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at: DHS-OIG.OfficePublicAffairs@oig.dhs.gov.

What We Found

After meeting with more than 140 individuals from DHS and other Federal agencies, we determined U.S. Immigration and Customs Enforcement (ICE) cannot effectively monitor the location and status of all unaccompanied alien children (UACs) once released or transferred from Department of Homeland Security and U.S. Department of Health and Human Services' (HHS) custody. From fiscal years 2019 to 2023, ICE transferred more than 448,000 UACs to HHS; most were released to sponsors. However, more than 31,000 of the 448,000 children's release addresses were blank, undeliverable, or missing apartment numbers. ICE also was not always aware of the location for UACs who fled HHS' custody.

We found that ICE did not effectively oversee UACs subject to removal by not issuing Notices to Appear (NTA) to all UACs to generate assignment of immigration court dates by the U.S. Department of Justice. As of January 2025, ICE had not served NTAs on more than 233,000 UACs. As of October 2024, ICE reported more than 43,000 UACs served NTAs failed to appear for scheduled court dates. Finally, ICE was not always notified of UACs' status and safety unless an allegation or tip was reported.

These issues occurred because ICE did not always receive information about UACs' sponsor locations from HHS and other Federal agencies. ICE also had limited staffing to monitor UACs' cases and did not have a policy for all officers to monitor UACs' cases. Without an ability to monitor the location and status of UACs, ICE is unable to facilitate court appearances and has no assurance UACs are safe from trafficking, exploitation, forced labor, or involvement in criminal activities that may pose a risk to local communities.

ICE Response

ICE concurred with all four recommendations. Appendix B contains ICE's management comments in their entirety.



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Abbreviations

DOJ	U.S. Department of Justice
DOL	U.S. Department of Labor
EARM	ENFORCE Alien Removal Module
ECD	estimated completion date
EOIR	Executive Office for Immigration Review
ERO	Enforcement and Removal Operations
HHS	U.S. Department of Health and Human Services
HSI	Homeland Security Investigations
ICE	U.S. Immigration and Customs Enforcement
MOA	Memorandum of Agreement
NTA	Notice to Appear
OPLA	Office of the Principal Legal Advisor
ORR	Office of Refugee Resettlement
UAC	unaccompanied alien child
U.S.C.	United States Code



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Background

Over the past few years, millions of people have attempted to enter the United States illegally; in addition to adults and family units, these individuals include unaccompanied alien children (UACs).¹ Several U.S. Government agencies, including the Department of Homeland Security, play a role once UACs cross the border and are later released from Federal custody. Within DHS, U.S. Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations' (ERO) mission is to protect the homeland by arresting and removing individuals who undermine the safety of the country's communities and the integrity of its immigration laws.

After DHS apprehends UACs, ICE generally transfers² them to the U.S. Department of Health and Human Services' (HHS) Office of Refugee Resettlement (ORR).³ HHS ORR is responsible for the care and custody of UACs awaiting immigration proceedings.⁴ This includes placing UACs in children's shelters and with qualified sponsors.⁵ HHS ORR usually retains custody until one of three conditions is met: (1) UACs are released to the care of a sponsor, (2) are transferred to foster care, or (3) turn 18 years old. Once a UAC is released from HHS to a sponsor, the sponsor becomes responsible for the UAC. Figure 1 shows the top 10 states where HHS ORR released UACs to sponsors from fiscal years 2019 to 2023.

¹ The *Homeland Security Act of 2002* defines "unaccompanied alien child" as a child who has no lawful immigration status in the United States; has not attained 18 years of age; and has no parent or legal guardian in the United States available to provide care and physical custody. Pub. L. No. 107-296, Section 462(g)(2) (codified at 6 United States Code (U.S.C.) § 279(g)(2)).

² Although ICE does not obtain custody of UACs, it is responsible for their transfer from U.S. Customs and Border Protection to HHS and relies on third-party contracts for transport.

³ DHS may permit return of certain UACs who are nationals or residents of countries bordering the United States to their country of nationality or country of last habitual residence. See 8 U.S.C. § 1232(a)(2).

⁴ *Homeland Security Act of 2002*, Pub. L. No. 107-296, Section 462(a) (codified at 6 U.S.C. § 279(a)); *William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008*, Pub. L. 110-457, Title II, Subtitle D, § 235(b)(1).

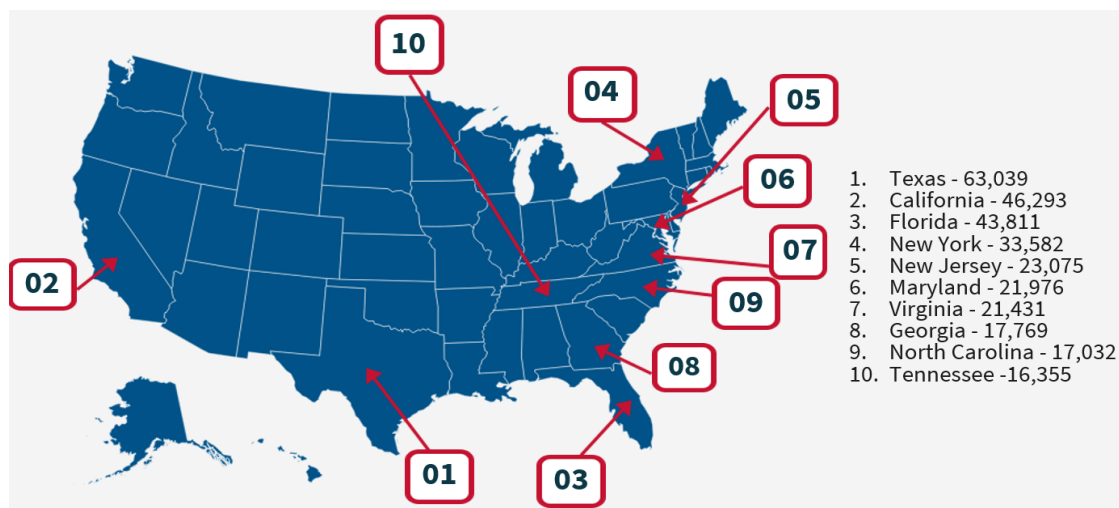
⁵ HHS ORR's *Sponsor Handbook* defines a sponsor as an individual or entity to which ORR releases a UAC out of Federal custody.



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Figure 1. Top 10 States Where HHS ORR Released Unaccompanied Alien Children to Sponsors, FYs 2019–2023



Source: DHS Office of Inspector General analysis of UACs' sponsor release data from HHS ORR website

According to ICE data, ICE transferred 448,820 UACs into the care and custody of HHS ORR from FYs 2019 to 2023.⁶ Although these UACs are no longer in DHS custody,⁷ ICE ERO remains responsible for managing and monitoring their immigration cases. According to ERO's Field Office Juvenile Coordinator Handbook,⁸ proper case management includes monitoring the status of UACs in immigration proceedings and documenting case updates in ICE systems.⁹ ERO officers are responsible for managing UACs' dockets, or cases, in their local area of responsibility, including ensuring UACs are properly served Notices to Appear (NTA) in immigration courts to initiate removal proceedings.¹⁰ ERO is also responsible for removing UACs from the country if they have final orders of removal from the U.S. Department of Justice (DOJ) or have been granted voluntary departure. See Appendix C for a flowchart depicting the NTA filing and immigration proceedings process. ICE's Office of the Principal Legal Advisor (OPLA) represents DHS in immigration proceedings.

Various Memoranda of Agreement (MOA) between DHS and HHS outline each agency's responsibilities for UACs. The most recent MOA was signed in 2021.¹¹ Under the current MOA,

⁶ U.S. Customs and Border Protection reported encountering approximately 110,000 UACs in FY 2024.

⁷ This audit's focus was limited to DHS and ICE. We did not have or obtain access to HHS' records.

⁸ *Juvenile and Family Residential Management Unit Field Office Juvenile Coordinator Handbook* (2017, revised in November 2021).

⁹ ERO manages UACs' cases in the ENFORCE Alien Removal Module (EARM).

¹⁰ ICE officials explained ICE can wait to file the NTA with the immigration court, or may not file the NTA, if a UAC submits applications for relief with U.S. Citizenship and Immigration Services.

¹¹ MOA between DHS and HHS, dated March 2021. House of Representatives Report of the Committee on Appropriation, No. 116-450 (July 15, 2020), which accompanied the 2021 *Consolidated Appropriations Act*, directed ORR to restrict information sharing with DHS.



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UACs remain in HHS custody for shorter periods of time. An ICE official said the 2018 MOA¹² negatively affected the sponsorship applications submitted to HHS and increased UACs' overall length of stay in ORR custody. In FY 2023, the average length of time a UAC was in HHS ORR custody was 27 days, down from 61 days in FY 2019. As of December 2024, a new MOA was in draft. Figure 2 outlines key Federal agencies and ICE offices' roles and responsibilities regarding UACs who have been released or transferred from DHS and HHS' custody.

Figure 2. Federal Agencies¹³ and ICE Offices Involved with Unaccompanied Alien Children Released or Transferred from DHS and HHS' Custody

	Enforcement and Removal Operations ERO manages the immigration enforcement process, including the arrest, detention, and removal of noncitizens who are subject to removal or are unlawfully present in the United States.
	Office of the Principal Legal Advisor OPLA serves as the exclusive representative of DHS in immigration removal proceedings before DOJ's Executive Office for Immigration Review.
	Homeland Security Investigations HSI investigates crimes of exploitation, which includes combating child exploitation, human trafficking, and other crimes against vulnerable populations.
	Office of Refugee Resettlement HHS ORR places UACs in the least restrictive setting that is in the best interests of the child, taking into consideration danger to self, danger to the community, and risk of flight. HHS ORR releases UACs to qualified sponsors and family members.
	Executive Office for Immigration Review DOJ's Executive Office for Immigration Review (EOIR) adjudicates immigration cases by interpreting and administering the Nation's immigration laws.

Source: DHS OIG analysis of Federal agencies' websites

¹² MOA between DHS and HHS, dated April 2018. We provide additional context on the 2018 MOA below.

¹³ This figure does not show all Federal agencies involved with UACs. For example, U.S. Customs and Border Protection encountered and apprehended most UACs. UACs or their sponsors may submit applications to U.S. Citizenship and Immigration Services to apply for immigration relief, such as asylum.



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According to ICE data, as of October 2024, more than 600 UACs, who were released to sponsors, were later arrested in the United States.¹⁴ Although this is less than 1 percent of all UACs who crossed the border between FYs 2019 and 2023, it illustrates the need for ICE to effectively monitor UACs in the country. According to an ICE Headquarters official, actively monitoring cases can help mitigate risks in a non-detained setting. In one example, following release from HHS' custody, a UAC was caught smuggling other alien children across the border. In another example, a UAC was accused of stabbing someone to death after release to a sponsor.

Safety concerns regarding UACs, such as trafficking, exploitation, and forced labor have been widely reported by various media outlets over the past year.¹⁵ Due to the ongoing concerns for the safety of UACs who failed to appear for their immigration hearings, we issued a management alert in August 2024¹⁶ with recommendations for ICE to improve coordination and information sharing. We conducted this audit to determine ICE's ability to monitor the location and status of UACs once released or transferred from DHS and HHS' custody. Since we conducted this audit, some ICE UAC processes may have evolved and changed.

Results of Audit

ICE cannot effectively monitor the location and status of all UACs once released or transferred from DHS and HHS' custody. From FYs 2019 to 2023, ICE transferred more than 448,000 UACs to HHS, most of whom were released to sponsors. However, more than 31,000 of the 448,000 children's release addresses were blank, undeliverable, or missing apartment numbers. ICE also was not always aware of the location for UACs who fled HHS' custody.

Further, we found that ICE did not effectively oversee UACs subject to removal by not issuing NTAs to all UACs to generate assignment of immigration court dates by the DOJ's Executive Office for Immigration Review (EOIR). As of January 2025, ICE had not served NTAs on more than 233,000 UACs. As of October 2024, ICE reported that more than 43,000 UACs served NTAs failed to appear for scheduled court dates. Finally, ICE was not always notified of UACs' status and safety unless an allegation or tip was reported.

These issues occurred because ICE did not always receive information about UACs' sponsor locations from HHS and other Federal agencies. ICE also had limited staffing to monitor UACs'

¹⁴ At the time of our audit, arresting agencies did not refer all UAC cases to ICE, and these were the only UACs ICE was aware of based on limitations from state and local ordinances.

¹⁵ Jack Gillum and Michelle Hackman, *U.S. Officials Wanted to Avoid Trump's 'Kids in Cages' Problem. Doing So Created Another Dilemma*, Wall Street Journal (July 8, 2024), <https://www.wsj.com/us-news/biden-migrant-children-temporary-guardians-trump-cages-e4d115f1>; Stephen Dinan, *Cartels prey on youngest migrants to profit from grim trafficking schemes*, The Washington Times (July 8, 2024), <https://www.washingtontimes.com/news/2024/jul/8/kidnapping-rape-murder-sex-trafficking-child-labor/>.

¹⁶ *ICE Cannot Monitor All Unaccompanied Migrant Children Released from DHS and U.S. Department of Health and Human Services' Custody*, OIG-24-46, August 2024.



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cases and did not have a policy for all officers to monitor UACs' cases.

Without an ability to monitor the location and status of UACs, ICE is unable to facilitate court appearances and has no assurance UACs are safe from trafficking, exploitation, forced labor, or involvement in criminal activities that may pose a risk to local communities.

ICE Could Not Monitor the Location of Unaccompanied Alien Children

ICE did not have accurate or complete addresses for all UACs released or transferred from DHS and HHS' custody. Of the 448,820 UACs that ICE transferred to HHS ORR from FYs 2019 to 2023, most UACs were released to sponsors. According to the Joint Concept of Operations between DHS and HHS,¹⁷ HHS ORR should provide UACs' addresses to ICE upon release to sponsors. Within 24 hours of a UAC's release to a sponsor, HHS' care provider informs the Field Office Juvenile Coordinator and provides the UAC's *Discharge Notification* form, which includes the UAC's name, alien number, date of birth, and country of birth. This form should also include the sponsor's name, the UAC's relationship to the sponsor, and the sponsor's address and phone number. Additionally, a UAC's sponsor should inform DOJ and DHS of any address change after being issued an NTA.¹⁸ However, the addresses ICE had for 31,322 of the 448,820 UACs were either blank, undeliverable,¹⁹ or missing apartment numbers.

At multiple ERO locations we visited, officers noted a recurring concern about receiving incomplete or commercial addresses for UACs instead of residences. For example, ERO officers at one location estimated addresses were incorrect 80 percent of the time. During one site visit, the audit team and ERO officers attempted to locate two addresses where HHS frequently released UACs.

Officers at one ERO location we visited estimated addresses were incorrect 80 percent of the time.

However, these addresses did not exist. In FY 2023, HHS ORR released 34 UACs to these nonexistent addresses. Of the 34 UACs released to these two addresses, only two were in immigration proceedings, one of whom subsequently failed to appear in court.

Finally, ICE was not always aware of the location of approximately 600 UACs whom HHS reported to ICE as fleeing HHS custody from FYs 2019 to 2023. One UAC fled five times in 1 year. Another UAC runaway, who admitted to murdering someone in their home country, had an international arrest warrant and, as of August 2024, the UAC had not appeared in court and had not been located. An ERO official noted a different UAC ran away on multiple occasions, assaulted HHS ORR staff, and admitted to being part of a Mexican cartel. Unless Federal, state, or local law

¹⁷ *Unaccompanied Alien Children Joint Concept of Operations* between DHS and HHS, July 2018.

¹⁸ 8 U.S.C. § 1229(a)(1)(F)(ii) and 8 Code of Federal Regulations § 1003.15(d)(2).

¹⁹ U.S. Postal Service OIG, *Undeliverable as Addressed Mail*, MS-AR-14-006, July 14, 2014. The U.S. Postal Service defines undeliverable mail as mail it cannot deliver to the address on the mail piece for reasons such as an incorrect or illegible address.



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enforcement encounter UAC runaways, maintain custody, and contact and further coordinate with ICE, ICE would not be aware of the UACs' location.

ICE Could Not Monitor the Immigration Status of All Unaccompanied Alien Children

ICE did not consistently oversee the status of UACs after they were released or transferred from DHS and HHS' custody. The Field Office Juvenile Coordinator Handbook²⁰ requires ERO officers to monitor UACs' status in immigration proceedings and serve them with NTAs that are properly filed with DOJ, which initiates removal proceedings under Section 240 of the *Immigration and Nationality Act* and generates assignment of immigration court dates by EOIR. As we reported in our management alert, once a UAC is served an NTA, ICE has a new opportunity to monitor their immigration status and safety. According to an ERO official, the NTA prompts ICE to have "eyes on the case" and monitor whether UACs appear for their immigration hearings. An ICE official also noted UACs are more likely to file for immigration relief benefits if served an NTA.

We reported,²¹ as of May 2024, ICE had not served NTAs²² on more than 291,000 UACs. Since then, ICE has prioritized issuing NTAs,²³ increasing the number of UACs served by approximately 57,000 as of January 2025.²⁴ At one ICE field office, ERO officers explained they prioritized issuing NTAs for UACs close to turning 18 because they become ICE's responsibility when they become adults. According to an ERO officer, UACs were not required to check in with ICE before turning 18 and, without NTAs and scheduled court appearances, ICE was not always aware of the location of UACs. However, more than 49,000 (21 percent) of the remaining unserved NTAs are for UACs who crossed the border in 2021 and still do not have an immigration court date.

While ICE began serving more NTAs, migrant border crossings also began to decrease in January 2024. Nevertheless, ICE still faces a large NTA backlog. One ICE officer said their team could not catch up on UAC cases because of the remaining NTA backlog. In one ERO area of responsibility, the number of unserved NTAs was approximately 30,000.

²⁰ *Juvenile and Family Residential Management Unit Field Office Juvenile Coordinator Handbook* (2017, revised in November 2021).

²¹ *ICE Cannot Monitor All Unaccompanied Migrant Children Released from DHS and U.S. Department of Health and Human Services' Custody*, OIG-24-46, August 2024.

²² ICE must wait 120 days before filing an NTA if the UAC is in HHS' custody. ICE can file NTAs immediately once a UAC is released to a sponsor.

²³ The more than 233,000 unserved NTAs included approximately 0.3 percent of UACs who applied for immigration relief, such as asylum, with U.S. Citizenship and Immigration Services. The number of unserved NTAs may be higher because the more than 233,000 only includes UACs as of January 1, 2021, and does not include UACs who crossed the border before this date.

²⁴ We obtained this information from ERO's Workload Remaining Dashboard, which is used to track NTA issuance.



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Unaccompanied Alien Children Did Not Always Appear for Immigration Court

A UAC's court appearance is also an opportunity for ICE to confirm the UAC is in a safe environment once released from HHS' custody. OPLA attorneys assess UACs during their court appearances and identify any potentially unsafe circumstances. These concerns should be reported by OPLA to ERO. In one instance in November 2023, an OPLA attorney learned while at court that a 17-year-old female UAC was living with a man she met at a laundromat who was not her sponsor; OPLA shared this information with ERO. An ERO officer said they would not have known about this case if OPLA had not notified ERO.

Despite the importance of this opportunity to check on UACs' welfare, the number of UACs who did not show up for immigration court appearances continues to grow. We reported in August 2024 that ICE reported more than 32,000 UACs failed to appear for their immigration hearings. As of October 2024, ICE reported more than 43,000 UACs served NTAs failed to appear for scheduled court dates. ICE did not have complete addresses for more than 3,600 of these UACs who failed to appear in court. According to ICE officials, UACs who do not appear for court are considered at higher risk for trafficking, exploitation, or forced labor.

According to ICE officials, UACs who do not appear for court are considered at higher risk for trafficking, exploitation, or forced labor.

Additionally, ICE ERO was not always notified of the status and safety of UACs unless an allegation or tip was reported. The 2021 MOA between ICE and HHS specifies instances in which HHS ORR must notify DHS of certain situations in an expeditious, timely manner. For example, HHS ORR must notify ICE Homeland Security Investigations (HSI) of allegations that a UAC is a victim of human smuggling or trafficking. HHS ORR reported referring more than 570 incidents involving UACs related to human, drug, and weapons trafficking to HSI from FYs 2019 to 2023. Although ICE HSI did not track the number of UACs reported as victims of trafficking or forced labor, this is a continuous concern as reported in several media articles we previously noted. Further, from October 2018 to October 2024, HSI's related investigations for smuggling and trafficking of UACs accounted for 0.35 percent of all HSI's related investigations.

ERO relies on HHS to screen for trafficking indicators for UACs in HHS custody and report suspicions to HSI. Because ERO officers rarely see UACs in person to screen for trafficking indicators, according to one ICE officer, they "do not know anything about UACs until a red flag pops up." One ERO officer stated if they hear from HHS, it usually relates to behavioral or safety issues or the UAC absconding. One ICE officer referred to UACs' monitoring as "no news is good news."

During our site visits to various ERO areas of responsibility, we noted the following potentially unsafe conditions for UACs:



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- We visited the three local sponsor addresses²⁵ where UACs had been released most often. At one location, we observed bars on the inside of a window. The ERO officer we traveled with said it is uncommon to have bars on the inside of a window as it would not prevent the glass from being broken from the outside. The ERO officer also said the area was very dangerous, was run by gangs, and had high crime rates and daily shootings. The same ERO officer noted one UAC within their area of responsibility left their sponsor's address to join a local gang.
- We also drove by sponsor addresses and noted one address was a rundown apartment complex with appliances stacked on patios and apartments with no doors. Police also reported criminal activities at this location, such as a stabbing and shootings. Another sponsor address was a dilapidated motel that did not have a kitchen. UACs' sponsors provided this address five times.
- During a site visit in another city, ICE officers noted an illegal drug deal occurring based on their law enforcement experience at an apartment complex where 44 UACs had been released in FY 2023.

ICE officers at one field office said they did not have input regarding the sponsor to whom a UAC is released,²⁶ and some UACs are released to sponsors who are not immediate family and are not a parent, sibling, or grandparent, for example. According to data we analyzed from ICE's Discharge Notification Form Dashboard,²⁷ HHS ORR released more than 14,500 UACs in FY 2023 and more than 9,600 UACs in FY 2024²⁸ to unrelated sponsors or other distant relatives. We further analyzed HHS sponsor release data and determined, of more than 2,400 UACs released to sponsors over 1 week in November 2023, ORR released more than 1,000 UACs to their parent or legal guardian. In this population of more than 2,400 UACs, ORR also released approximately 300 UACs to unrelated sponsors or distant family members. Three UACs were released to their spouses, including one spouse who was 40 years old. Although these relatives may have been appropriately qualified based on ORR's policy, one ERO officer noted the UACs most at risk for trafficking or forced labor are those released to an unrelated sponsor.

²⁵ We obtained a spreadsheet from the local ERO field office of UACs' sponsor release addresses and identified addresses where UACs were released most frequently.

²⁶ HHS is responsible for sponsor placement decisions. 8 U.S.C. § 1232(c)(3)(A).

²⁷ ERO created this dashboard using data HHS ORR provides to ERO weekly; the dashboard contains information on UACs released to sponsors.

²⁸ The FY 2024 data is as of September 11, 2024.



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Multiple Factors Caused ICE's Inability to Have Accurate Addresses and Monitor the Status of Unaccompanied Alien Children

Several factors hindered ICE's ability to monitor the location and status of UACs. Most notably, ICE did not always receive accurate and timely information about these indicators from Federal partners. Additionally, resource limitations negatively impacted officers' time and ability to verify the location or immigration case status of UACs. Resource constraints also impacted ERO's ability to issue NTAs to UACs after they were released or transferred from DHS and HHS' custody. Finally, ICE's policy did not provide officers guidance on actions to take if a UAC is identified as at risk or instruct field officers how to monitor UACs once they have been released from HHS' custody, especially if concerns arise, such as that UACs might be trafficked or missing.

Information Sharing Was Limited Between ICE and Other Federal Agencies

Although ICE has a role to ensure UACs' safety, the existing MOA between ICE and HHS limits ICE from fully doing so by restricting sponsor information that is shared by HHS. Specifically, the 2021 MOA removed a requirement, which had been present in a previous MOA,²⁹ for HHS ORR to provide ICE with biographic and biometric (fingerprints) information for all potential sponsors and adult members of their household, which was used to vet the sponsors.³⁰

HHS officials noted the April 2018 MOA with DHS was rescinded to reduce barriers that hindered identifying potential sponsors for UAC placement. According to the process as of 2024, when HHS released UACs to a sponsor, ERO usually only received the sponsor's name, relationship to the UAC, and address. One supervisory ICE officer said, "getting information from HHS is like pulling teeth." According to ICE officers, HHS fears that sharing information could lead to enforcement actions against the sponsor.

ERO officers noted information sharing was based on relationships established with HHS staff. One ERO officer noted they are always open to share information with HHS, but HHS does not usually share information with ICE. According to an ICE Headquarters official, ERO receives information regarding UACs' sponsor locations at the time of initial release to a sponsor. However, ERO does not receive updated information after UACs are released, such as an address or sponsor change. One ICE location we visited did not have a local HHS point of contact to facilitate follow-up on a UAC's location or status. An HHS official stated they did not provide results from HHS' safety and wellbeing checks and post-release services of UACs in sponsors' custody to ICE. The results from HHS' checks and post-release services could be helpful to ICE, especially if HHS obtains updated addresses for the UACs. As of December 2024, a new draft MOA

²⁹ MOA between DHS and HHS, dated April 2018.

³⁰ According to the *ORR Unaccompanied Children Program Policy Guide* (as of March 26, 2023), ORR transmits fingerprint submissions (if required) to the Federal Bureau of Investigations to perform criminal history checks.



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was in progress between DHS and HHS. An ICE official said no specific timelines have been set for finalizing the draft MOA.

Legislation also restricts the extent to which ICE can exercise its law enforcement authority to effectively monitor UACs. The *Homeland Security Act of 2002*³¹ and the *William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008*³² authorize HHS ORR to make placement determinations for UACs. The acts also assign HHS responsibility to ensure UACs remain protected from smugglers, traffickers, or others who might seek to victimize or otherwise engage them in criminal, harmful, or exploitive activity. HHS must also ensure UACs are placed in settings where they are not likely to pose a danger to themselves or others. However, HHS does not have law enforcement authority to intervene on behalf of UACs if HHS suspects their safety is threatened. The 2020 *Consolidated Appropriations Act*³³ also prohibits ICE from using funds to conduct certain enforcement actions, such as removing sponsors of UACs based on information HHS ORR provides.³⁴ Therefore, ICE had limited authority to act on concerns when a sponsor may be endangering a UAC's safety.

Although forced labor is a factor threatening the safety of UACs, ERO did not have an established relationship with the U.S. Department of Labor (DOL) to identify exploited UACs. After meeting with ICE officers at nine locations, we determined none had a working relationship with DOL or received tips from DOL about UACs in forced labor. According to DOL officials, they did not track cases based on immigration status to identify if UACs were victims of forced labor. Further, DOL is not required to, and did not, share information with ICE regarding labor concerns.

Staffing Constraints Hindered ERO's Ability to Monitor Unaccompanied Alien Children

ERO faced staffing constraints impacting its ability to monitor cases for UACs who are not detained in Federal custody. As of September 2024, ERO officers were required to monitor more than 7.5 million non-detained cases, which includes adults, family units, and UACs. Over 1,000 ERO officers across 25 field offices manage these non-detained cases. During one site visit, we learned ERO had 10 deportation officers managing 300,000 non-detained cases as of February 2024. The 10 officers individually managed an average of 30,000 cases per year, which included 17,000 UAC cases. As we noted in a previous audit report,³⁵ ICE officers had on average only 3 minutes to spend on each case, per year.

³¹ *Homeland Security Act of 2002*, Pub. L. No. 107-296, Section 462(a).

³² *William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008*, Pub. L. 110-457, Title II, Subtitle D, § 235(b)(1).

³³ *Consolidated Appropriations Act*, 2020, Pub. L. No. 116-93, Section 216(a).

³⁴ HHS' policy also noted that House Report 116-450, which accompanies the Consolidated Appropriations Act, 2021, directs ORR to restrict sharing certain case-specific information with EOIR and DHS. HHS, *ORR Unaccompanied Children Program Policy Guide*, Section 5.10.2 (March 2023).

³⁵ *DHS Does Not Have Assurance That All Migrants Can be Located Once Released into the United States*, OIG-23-47, September 2023.



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As we reported in our management alert and noted in a previous audit report,³⁶ ICE did not have adequate staffing, which limited officers' time and ability to verify the location or immigration case status of migrants. Resource constraints also impacted ERO's ability to issue NTAs to UACs after they are released or transferred from DHS and HHS' custody. ERO officers are responsible for serving NTAs on UACs. According to the UAC Joint Concept of Operations, ICE requires a properly served NTA to file with DOJ to initiate UAC immigration proceedings. As of August 2024, ERO reported 100 primary Field Office Juvenile Coordinators monitored UACs' cases and issued NTAs nationwide. An ICE official also noted ERO staffing levels and the significant number of UACs encountered from 2021 to present, as well as ICE's current policy requiring a 120-day hold period to file the NTA with DOJ, which HHS requested, contributed to the number of unserved NTAs for UACs. Although ICE must wait 120 days before filing an NTA if the UAC is in HHS' custody, ICE can file NTAs immediately once a UAC is released to a sponsor.

Using what limited staffing ICE had, officers prioritized border operations support details, fugitive operations, and other docket management activities. A 2021 DHS Secretary Memorandum³⁷ issued by the former secretary guided Federal officials to use discretion to decide whom to arrest, detain, and remove from the United States, focusing on the apprehension and removal of noncitizens who threaten: 1) national security, 2) public safety, and 3) border security. Because most UACs did not pose these defined threats, ICE devoted its limited resources to more urgent security threats.

Monitoring a UAC's case is different from managing an adult's case and may require other considerations for which ERO officers — who are not Field Office Juvenile Coordinators — are untrained. For example, ICE requires adult migrants to check in with ICE when they are released from custody. No similar requirement applies to UACs. An ERO official stated, "Resources are not going to be wasted for non-criminal matters." Removing migrant adults takes fewer resources and less time and effort than removing UACs. Based on our interviews with personnel from nine ERO field offices, none of the officers removed UACs,³⁸ even UACs with final removal orders. According to an ERO officer at one location, since UACs may require more resources to remove, their office has never seen a removal order on a UAC even if they did not show up for court.

ERO Did Not Have a Policy for All Officers Overseeing Unaccompanied Alien Children

Although there are circumstances in which ICE has authority and can intervene on behalf of UACs in danger, ICE's Field Office Juvenile Coordinator Handbook does not include actions all ERO officers should take if a UAC is identified as being at risk. The Handbook directs staff to process,

³⁶ *Ibid.*

³⁷ DHS Secretary Memorandum, *Guidelines for the Enforcement of Civil Immigration Law* (September 30, 2021). This memorandum was rescinded in 2025, but in place during the audit period.

³⁸ The exception is voluntary removals.



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transport, manage, and remove UACs. However, ERO officers from four of the locations we visited noted ICE had no detailed policy for how all field officers overseeing UAC status should monitor UACs once released from HHS' custody, especially if concerns arise, such as that UACs might be trafficked or missing. Other ERO officers, who were not trained as Field Office Juvenile Coordinators but still managed UACs' cases, did not have policies to monitor such cases. In one location, officers overseeing non-detained UACs said they do not know what to do with UACs, as UAC cases require management different from adult cases.

Conclusion

ICE's current ability to monitor the location and welfare of UACs is significantly limited. Given ICE's current limitations, DHS has no assurance UACs are safe from trafficking, exploitation, forced labor, or involvement in criminal activities that may pose a risk to local communities. Without accurate or complete sponsor addresses, ICE cannot maintain awareness of the location of UACs, which can also adversely impact ICE's ability to issue NTAs. Moreover, the inability to monitor the status of UACs after they are released from Federal custody means ICE cannot determine their welfare or identify those children at risk of harm. Finally, UACs may pose a risk to their local communities if they are involved in criminal activities; data indicated that during the scope of our audit, more than 600 UACs were arrested after being released. ICE needs additional authority, information, resources, and policies to more effectively and consistently monitor the location and status of UACs.

Recommendations

Recommendation 1: We recommend the Acting Director for ICE review and revise as needed Memoranda of Agreement and the Joint Concept of Operations between ICE and the U.S. Department of Health and Human Services and continue to work on information-sharing agreements related to unaccompanied alien children.

Recommendation 2: We recommend the Acting Director for ICE develop and implement a formal process to review ICE system data and identify inaccurate and incomplete addresses for unaccompanied alien children and share this information externally with the U.S. Department of Health and Human Services.

Recommendation 3: We recommend the Acting Director for ICE develop and implement a plan to address the backlog of unserved Notices to Appear for unaccompanied alien children, including a timeframe for reducing the backlog.

Recommendation 4: We recommend the Acting Director for ICE update existing guidance, such as the Field Office Juvenile Coordinator Handbook, to clarify how ICE ERO officers should elevate



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concerns regarding the safety or circumstances of unaccompanied alien children and ensure wide dissemination of all updated guidance.

Management Comments and OIG Analysis

ICE provided management comments on a draft of this report. Appendix B contains a copy of ICE's response in its entirety. We also received, under separate cover, technical comments from ICE on the draft report, and we made changes to the report as appropriate. ICE concurred with all the recommendations. We consider recommendations 1 through 4 open and resolved. A summary of ICE's response to the recommendations and our analysis follows.

ICE Response to Recommendation 1: Concur. ICE ERO will work with HHS ORR to update information-sharing agreements in the current MOA and the Joint Concept of Operations related to UACs. Estimated completion date (ECD): September 30, 2025.

OIG Analysis: ICE provided a corrective action plan and ECD that will address the recommendation. We consider this recommendation open and resolved until we receive updated information-sharing agreements between ICE and HHS related to UACs.

ICE Response to Recommendation 2: Concur. ICE ERO will develop and implement a formal process to notify and share with HHS ORR when inaccurate and incomplete addresses for UACs are identified. ECD: September 30, 2025.

OIG Analysis: ICE's actions and ECD are responsive to the recommendation, which will remain open and resolved until ICE provides documentation demonstrating it developed and implemented a formal process to share inaccurate and incomplete addresses for UACs with HHS ORR, when identified.

ICE Response to Recommendation 3: Concur. ICE ERO will develop and implement a plan to address the backlog of unserved NTAs for UACs. ECD: September 30, 2025.

OIG Analysis: ICE provided a corrective action plan and an ECD responsive to the recommendation, which will remain open and resolved until ICE provides documentation showing it developed and implemented a plan to address the backlog of unserved NTAs for UACs, including a timeframe for reducing the backlog.

ICE Response to Recommendation 4: Concur. ICE ERO will update and disseminate the Field Office Juvenile Coordinator Handbook, and associated guidance, as appropriate, to instruct ERO officers on how and when they should elevate concerns regarding UACs' safety and circumstances. ECD: September 30, 2025.



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OIG Analysis: ICE's actions and ECD are responsive to the recommendation, which will remain open and resolved until ICE provides documentation that it updated to the Field Office Juvenile Coordinator Handbook, and appropriate associated guidance, as well as evidence that it issued these materials to all ICE ERO officers.



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Appendix A: Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Pub. L. No. 107–296) by amendment to the *Inspector General Act of 1978*.

We conducted this audit to determine ICE’s ability to monitor the location and status of UACs once released or transferred from DHS and HHS’ custody. Our audit scope included ICE transfers of UACs to HHS between FYs 2019 and 2023.

During this audit, we researched and analyzed more than 240 documents. We reviewed Federal laws; DHS, HHS, and ICE guidance; policies and procedures; MOAs; component data; and media articles related to UACs. We also reviewed DHS OIG, HHS OIG, DOJ OIG, and U.S. Government Accountability Office reports to identify prior findings and recommendations. We analyzed ICE operations and relevant systems to monitor UACs. We used documentary, physical, and testimonial evidence to evaluate whether ICE effectively monitors UACs and tracks NTA issuance.

We reviewed ICE ERO and OPLA systems and evaluated the challenges, data accuracy, and reliability of the relevant systems. Specifically, we reviewed ICE’s EARM, ICE’s ERO Workload Remaining and Discharge Notification Form Dashboards, and OPLA’s Principal Legal Advisor Network. We also assessed ICE’s information-sharing efforts internally and externally with partners, such as HHS and DOL.

We interviewed more than 140 officials from ICE ERO, HSI, OPLA, DHS’ Center for Countering Human Trafficking, and DHS’ Office of Homeland Security Statistics, as well as external stakeholders from DOJ, HHS, DOL OIG, and a DOL official from one state. We obtained written responses from DOL. The interviews included meetings with ICE field offices located in Miami, Los Angeles, St. Paul (Minnesota), Philadelphia, San Diego, Baltimore, Houston, Dallas, New York, and Chicago. During our site visits, we observed 22 judgmentally selected addresses where UACs were released to sponsors in Illinois, Maryland, New York, and Texas. ICE also provided us direct access to its ERO Workload Remaining and Discharge Notification Form Dashboards, allowing us to review real-time data throughout the audit. Additionally, we received demonstrations of multiple systems from ICE personnel including EARM, the Principal Legal Advisor Network, and the ERO Workload Remaining Dashboard, which contained information on UACs’ unserved NTAs. We also obtained and analyzed data for:

- UACs ICE transferred to HHS from FYs 2019 to 2023;
- UACs’ sponsor release addresses;
- notifications of UACs’ status from HHS ORR to ICE;
- UACs who ran away from HHS custody between FYs 2019 and 2023;



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- UACs' NTA statistics from FY 2019 to September 2024;
- the ages of UACs with unserved NTAs;
- UACs failing to appear in court; and
- UACs' criminal activities.

We assessed internal controls related to ICE's ability to monitor UACs once they were released or transferred from DHS and HHS' custody. Based on our assessment, we identified areas for improvement with ICE's ability to monitor the location and status of UACs, as well as effectively monitor all UACs released or transferred from DHS and HHS' custody. We identified internal control weaknesses in the body of this report. However, since our internal control assessment was limited to the audit objective, it may not have disclosed other internal control deficiencies that potentially existed.

As part of this audit, we obtained and analyzed the universe of data on the 448,820 UACs transferred to HHS from FYs 2019 to 2023 and identified missing, undeliverable, and incomplete sponsor addresses. To assess the reliability of EARM, we reviewed system controls including EARM manuals and Privacy Impact Assessments, conducted meetings with ICE officials to understand the system, obtained a walkthrough of the system, relied on previously completed audits and the audit team's familiarity using EARM data, and performed limited testing on the data received to determine whether it was complete and reliable. We found data from EARM was reliable and could be used to support audit findings. To track NTA issuance, we obtained information from ERO's Workload Remaining Dashboard, which extracted data from EARM, DOJ EOIR, and U.S. Citizenship and Immigration Services. We did not assess the reliability of data from sources external to ERO, including DOJ EOIR, HHS ORR, and U.S. Citizenship and Immigration Services. This includes data within the ERO Workload Remaining Dashboard, data within the Discharge Notification Form Dashboard, and the number of UACs who did not appear in court.

We conducted this audit from October 2023 through November 2024 pursuant to the *Inspector General Act of 1978*, 5 U.S.C. §§ 401–424, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

DHS OIG's Access to DHS Information

During this audit, ICE provided timely responses to our requests for information and did not delay or deny access to information we requested.



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Appendix B: ICE Comments on the Draft Report

Office of the Chief Financial Officer

U.S. Department of Homeland Security
500 12th Street, SW
Washington, D.C. 20536



**U.S. Immigration
and Customs
Enforcement**

BY ELECTRONIC SUBMISSION

March 5, 2025

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: Jennifer Cleary
Chief Financial Officer and
Senior Component Accountable Official
U.S. Immigration and Customs Enforcement

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JENNIFER S. CLEARY
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Date: 2025.03.05
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SUBJECT: Management Response to Draft Report: "ICE Cannot
Effectively Monitor the Location and Status of All
Unaccompanied Migrant Children After Federal Custody"
(Project No. 23-044-AUD-ICE)

Thank you for the opportunity to comment on this draft report. U.S. Immigration and Customs Enforcement (ICE) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

ICE leadership is pleased to note OIG's recognition of the importance of ICE Enforcement and Removal Operations' (ERO) mission to protect the homeland by arresting and removing individuals who undermine the safety of the country's communities and the integrity of its immigration laws. ICE remains committed to coordinating closely with partners, such as U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR)—the agency responsible for the care and custody of unaccompanied alien children (UAC)—to ensure the timely and safe transfer of UAC from the U.S. Department of Homeland Security (DHS) to HHS ORR custody.¹ ICE also remains committed to strengthening this coordination and information sharing of UAC once released or transferred from DHS and HHS ORR custody.

The draft report contained four recommendations with which ICE concurs. Attached find our detailed response to each recommendation. ICE previously submitted technical

¹ <https://www.ice.gov/detain/detention-management>

www.ice.gov



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comments addressing several accuracies, contextual, and other issues under a separate cover for OIG's consideration, as appropriate.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Attachment



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Attachment: Management Response to Recommendations Contained in OIG 23-044-AUD-ICE

OIG recommended the Acting Director for ICE:

Recommendation 1: Review and revise, as needed, Memorandums of Agreement [MOA] and the Joint Concept of Operations between ICE and the U.S. Department of Health and Human Services and continue to work on information sharing agreements related to unaccompanied migrant children.

Response: Concur. ICE ERO will work with HHS ORR to update information sharing agreements in the current MOA² and the Joint Concept of Operations³ related to UAC. Estimated Completion Date (ECD): September 30, 2025.

Recommendation 2: Develop and implement a formal process to review ICE system data and identify inaccurate and incomplete addresses for unaccompanied migrant children and share this information externally with the U.S. Department of Health and Human Services.

Response: Concur. ICE ERO will develop and implement a formal process to notify and share with HHS-ORR when inaccurate and incomplete addresses for UAC are identified. ECD: September 30, 2025.

Recommendation 3: Develop and implement a plan to address the backlog of unserved Notices to Appear [NTA] for unaccompanied migrant children, including a timeframe for reducing the backlog.

Response: Concur. ICE ERO will develop and implement a plan to address the backlog of unserved NTAs for UAC. ECD: September 30, 2025.

Recommendation 4: Update existing guidance, such as the Field Officer Juvenile Coordinator Handbook, to clarify how ICE ERO officers should elevate concerns regarding the safety or circumstances of unaccompanied migrant children, and ensure dissemination of all updated guidance.

² "MOA among The Office of Refugee Resettlement of the US Department of Health and Human Services And US ICE and US CBP of the US Department of Homeland Security Regarding Consultation and Information Sharing in Matters Relating to Unaccompanied Children," dated March 11, 2021.

³ "Unaccompanied Alien Children Joint Concept of Operations between DHS and HHS-ORR," dated July 31, 2018.



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Response: Concur. ICE ERO will update and disseminate the Field Office Juvenile Coordinator Handbook,⁴ and associated guidance, as appropriate, to instruct ICE ERO officers on how and when to elevate concerns regarding the safety or circumstances of UAC. Once this handbook is updated, ICE's Juvenile Family Management Division will broadcast the updated document to ERO Officers. ECD: September 30, 2025.

⁴ "Juvenile and Family Residential Management Unit Field Office Juvenile Coordinator Handbook," revised November 2021.

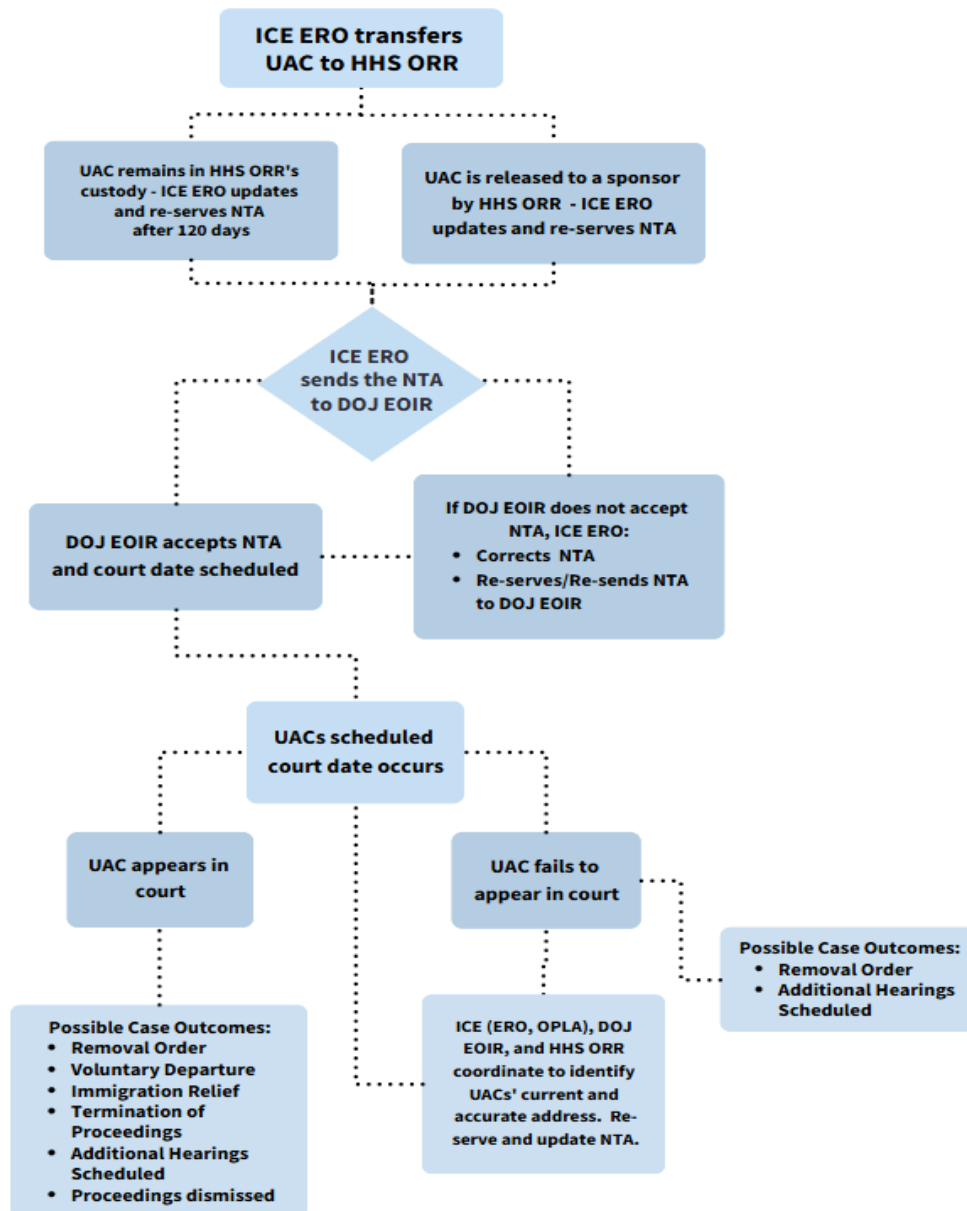


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Appendix C:

NTA Filing and Immigration Proceedings Process Flowchart³⁹



Source: DHS OIG analysis of ICE documents and interviews

³⁹ This flowchart shows the process after U.S. Customs and Border Protection has issued and served the NTA after apprehensions. This process only applies if ICE has a valid U.S. address for the UAC. It does not represent every scenario in the process, such as other DHS agencies' roles apprehending UACs and issuing NTAs, specific processes serving the NTA to DOJ EOIR, steps taken when ICE does not have an accurate or current address, or if a UAC runs away.



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Appendix D: Report Distribution

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