



THE SECRETARY OF HEALTH AND HUMAN SERVICES

WASHINGTON, D.C. 20201

FEB 23 2016

The Honorable Carolyn N. Lerner
Special Counsel
U.S. Office of the Special Counsel
1730 M Street, N.W., Suite 218
Washington, D.C. 20036-4505

Re: OSC File No. DI-15-5203

Dear Ms. Lerner:

In August 2015, the U.S. Office of Special Counsel (OSC) referred to HHS a whistleblower disclosure alleging that "in early July 2015 [ICE] ... determined that 3,675 unaccompanied children (UAC) were in the custody of approximately 3,600 sponsors with significant criminal records" and that "[w]hile approximately 3,300 sponsors were convicted of immigration-related offenses, the remaining 300 were convicted of more serious charges." OSC requested that the HHS Secretary conduct – or delegate to the Office of Inspector General (OIG) – an investigation of the whistleblower allegations and submit a written report.

HHS treats each child referred to its care with compassion and a commitment to their safety and well-being. HHS takes any allegations of even potential harm very seriously. Upon receiving this referral from your office, HHS directed its Office of the Inspector General (OIG) to conduct an independent review of the information provided by the whistleblower and develop a report. That report, which concludes that the data provided do not substantiate the allegations that the identified children were placed with sponsors with significant criminal backgrounds, is enclosed. I am also including an attachment that details ACF's efforts to review relevant policies and procedures.

Thank you for bringing this matter to our attention. HHS is committed to identifying potential program vulnerabilities and is continually working to improve its policies and procedures to protect the safety and well-being of children both while they are in our care and after they are released to sponsors. Please let me know if I can provide you with any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Sylvia M. Burwell".

Sylvia M. Burwell

Enclosures

Unaccompanied Children Program

The Office of Refugee Resettlement (ORR) in the Department of Health and Human Services' (HHS) Administration for Children and Families (ACF) has responsibility to care for unaccompanied children referred to its custody and manages the family reunification process. This attachment provides background information on ORR's responsibility for unaccompanied children, as well as ORR's continuous efforts to strengthen safeguards for children.

HHS's Mission

HHS's mission to care for unaccompanied children who have been referred to ORR has two key parts. The first is to create a safe and healthy environment in its shelters, one that ensures access to nutritious food, clean clothes, education and medical services. The second is to identify the most appropriate and least restrictive placement, usually with a sponsor, for each child while they await their U.S. immigration proceedings, subject to considerations of risk of flight, and danger to the child or community.

As soon as a child is referred to its care, ORR begins the process of identifying potential sponsors, with preference given first to parents, then other family members -- some 87 percent of sponsors are parents or close family members. If there is not a suitable parent or other relative in the U.S., ORR works with the family to identify an individual who might care for the child while the immigration proceedings are pending. Once a sponsor has been identified, the potential sponsor undergoes a multi-step assessment process.

ORR requires that potential sponsors provide a significant amount of information as part of the release evaluation process, including verification of identity and relationship to the child. ORR care providers conduct interviews with the child, the potential sponsor, and the child's family. ORR also runs background checks on every sponsor to identify potential criminal history or child welfare issues. All potential sponsors must complete a criminal public record check,¹ based on the sponsor's name and address, and a sex offender registry check.

Additionally, a fingerprint background check is required whenever the potential sponsor is not a parent or legal guardian. When the potential sponsor is a parent or legal guardian, a fingerprint background check is required when there is a documented risk to the safety of the minor, the minor is especially vulnerable, and/or the case is referred for a home study. The fingerprints are cross-checked with the Federal Bureau of Investigation's (FBI) national criminal history and state repository records, which include DHS arrest records. For an unresolved criminal arrest or issue still in process, ORR-funded care providers may conduct an additional state or local check to assist in locating arrest records or other criminal offense details. ORR conducts state child

¹ The public records check searches hundreds of public databases, including county criminal records; state criminal records; state sex offender registries; international and federal national security sources, such as INTERPOL Most Wanted, United Nations Consolidated Sanctions List, European Union Terrorism Sanctions List, State Department's Foreign Terrorist Organizations List and Terrorist Exclusion List, National Counterterrorism Center's Comprehensive Terrorist List, America's Most Wanted Fugitive List, Federal Fugitives List, Immigrations and Customs Enforcement's Most Wanted, and Department of Labor's Forced and Child Labor List; and federal programs exclusions, enforcement, and sanctions lists (e.g. HHS' Office of the Inspector General Exclusions list).

abuse and neglect (CA/N) registry checks in any case where a home study is conducted, where a special concern is identified, and where the sponsor is unrelated or distantly related to the child. For specific issues identified during the assessment process, such as a trafficking indicator or if the child has special needs, the case worker requests a home study of the sponsor's home before making a recommendation about whether or not to release a child to the sponsor.

The decision to release a child is based on the best interests of the child and takes into account the totality of the circumstances. ORR will deny release to a potential sponsor if the potential sponsor is not willing or able to provide for the child's physical or mental well-being; the physical environment of the home presents risks to the child's safety and well-being; or release of the unaccompanied child would present a risk to him or herself, the sponsor, household, or the community.

Every release decision receives three levels of review. Once the case manager has all of the required documentation and forms, a recommendation for release is sent to an independent, third-party review office for its review. The final step in the approval process is review by a federal field specialist who works for ORR. At every stage of the process, the primary concern is the safety of the child.

Despite ORR's efforts to place children with appropriate sponsors, occasionally, dishonest people try to exploit the system and break the law in order to take advantage of unaccompanied children and their families. When ORR learns of fraud or cases of exploitation, it immediately begins to work with all appropriate law enforcement agencies and state child welfare organizations so that those who took advantage of a child are brought to justice to the full extent of the law and these children and their families are protected.

Continuous Efforts to Strengthen Safeguards

Over the last year, ORR has made a number of enhancements to its process for safely releasing children to qualified sponsors, strengthening its pre-screening protocols and augmenting the resources and protections available post-release. In addition, ORR is carefully reviewing a recent Senate Permanent Subcommittee on Investigations report on Protecting Unaccompanied Children from Trafficking and Other Abuses for areas where it can continue to improve the protections in place.

Recently, ORR implemented new measures to enhance the pre-release screening of potential sponsors, such as requiring background checks on all adult household members living with the potential sponsor and individuals identified in the sponsor's care plan, and instituting mandatory home studies for additional categories of children, including children 12 and under released to a non-relative or distantly related sponsor and cases in which a non-relative sponsor has previously sponsored a child or proposes to sponsor more than one child to whom the sponsor is not related.

It is not, nor has it ever been, the practice of ORR to place children with sponsors who have serious criminal convictions. ORR, however, recently enhanced its policies regarding the role of criminal history in a release decision, clarifying that release will be denied to a potential sponsor who is not a parent or legal guardian if the potential sponsor or a member of the potential sponsor's household 1) has been convicted of a certain felonies, including a crime against a

child, a violent crime, drug-related offenses, or trafficking, or has a criminal history or pending criminal charges or child welfare adverse findings from which one could reasonably infer that the sponsor's ability to ensure the safety and well-being of the child is compromised; or 2) has certain substantiated adverse child welfare findings, for example, severe or chronic abuse and neglect. Similarly, ORR will reject any sponsor care plans that identify an adult caregiver who has any of the disqualifying criteria.

ORR has also improved its post-release services. ORR provides post-release assistance to many children and sponsors, including help identifying resources in their communities for medical care and mental health services, accessing schools, and finding legal support. ORR provides these services for any child who received a home study or on a case-by-case basis if it is determined the child has mental health or other needs.

In July 2015, ORR began a pilot project to provide post-release services to all unaccompanied children released to a non-relative or distant relative sponsor, as well as children whose placement has been disrupted or is at risk of disruption within 180 days of release and the child or sponsor has contacted ORR's hotline (in their native language). In fiscal year 2015, ORR provided post-release services for 8,618 unaccompanied children.

In May 2015, ORR expanded the capability of an existing telephone hotline, used to help parents locate children in ORR custody, to accept calls from children with safety-related concerns, as well as from sponsors calling with family problems or child behavior issues, or in need of assistance connecting to community resources. Every child released to a sponsor is given a card with the hotline's phone number on it (Spanish language access as well), and all providers and sponsors are also provided with the hotline phone number. Starting last summer, care providers now call each household 30 days after the child is released from ORR care to check on the child's wellbeing and safety.

While the changes ORR has made over the last year establish important new safeguards, ORR is mindful of the continued need to closely examine its policies and procedures and is actively working to identify additional steps it can take to strengthen its program. ORR has taken a number of additional steps this week. First, ORR has posted a Senior Advisor for Child Well-Being and Safety position, which will augment existing child welfare expertise and support leadership's development of additional program improvements related to child safety post-release. Second, ORR has established a new discretionary home study policy, which will allow ORR care providers to recommend home studies in instances not required by TVPRA or existing ORR policy. Third, ORR is working with subject matter experts across the Administration to identify and incorporate enhanced interview and document verification techniques into the sponsor assessment process.

ORR takes seriously the recommendations and insights provided by the HHS Inspector General and will continue to work cooperatively with the IG and with its interagency partners to identify additional steps it can take to strengthen its program.



DEPARTMENT OF HEALTH AND HUMAN SERVICES

OFFICE OF INSPECTOR GENERAL

WASHINGTON, DC 20201



TO: Sylvia Mathews Burwell
Secretary

FEB 22 2016

FROM: Daniel R. Levinson
Inspector General *Daniel R. Levinson*

SUBJECT: Unaccompanied Children Whistleblower Allegations (*OSC File No. DI-15-5203*)

In August 2015, the U.S. Office of Special Counsel (OSC) referred to the Department of Health and Human Services (HHS) a whistleblower disclosure alleging that employees at the Administration for Children and Families, Office of Refugee Resettlement (ORR) engaged in conduct that may constitute a violation of law, rule, or regulation; gross mismanagement; and a substantial and specific danger to public safety. The Secretary requested that the Office of Inspector General (OIG) investigate the whistleblower allegation.

This memorandum provides OIG's findings related to the specific allegation made by the whistleblower that certain unaccompanied children had been inappropriately placed with sponsors with significant criminal histories. Although this memorandum is based solely on our review of the whistleblower allegation, OIG has ongoing and future work planned to address the safety and welfare of unaccompanied children, given public information about potential human trafficking. The conclusion of this memorandum provides details about this work.

According to OSC, "[t]he whistleblower asserted that in early July 2015 Immigration and Customs Enforcement . . . determined that 3,675 UAC [unaccompanied children] were in the custody of approximately 3,600 sponsors with significant criminal records" and that "[w]hile approximately 3,300 sponsors were convicted of immigration-related offenses, the remaining 300 were convicted of more serious charges." OSC specifically listed the "more serious charges" as assault, battery, child neglect, contributing to the delinquency of a minor, domestic violence, homicide, and lewd or lascivious acts with minors and did not include immigration-related offenses.

OSC stated in the referral letter that "*Enclosure A* [Excel spreadsheet data provided by the whistleblower] indicates that ORR Federal Field Specialists chronically failed to properly oversee sponsor selection, potentially endangering the safety and welfare of children." OSC requested that the HHS Secretary conduct – or delegate to OIG – an investigation of the whistleblower allegations and submit a written report.

ORR Policy for Screening Sponsors

ORR policies are available online for grantees to access and are updated by ORR periodically. Governing policies related to sponsor screening changed during the period of our review (details of the policy changes are available in Appendix B). According to ORR policy, all potential sponsors of unaccompanied children must have a background check. The level of the check depends on the relationship between the potential sponsor and child. If the potential sponsor is the child's parent or legal guardian, considered a Category 1 relationship, ORR policy requires that an Internet criminal public records search be conducted, and additional checks are required to be conducted if there are documented risks. If the potential sponsor is an immediate adult relative, such as a sibling, aunt or uncle, grandparent, or cousin, considered a Category 2 relationship, ORR requires an Internet criminal public records search, an immigration status check, and a national Federal Bureau of Investigation (FBI) criminal history check.¹ Finally, if the sponsor is a distant relative, unrelated adult, or spouse of the unaccompanied child, considered a Category 3 relationship, ORR requires Category 2 criminal checks as well as a Child Abuse and Neglect (CAN) check of State databases.² ORR has recently updated its policy to strengthen background check requirements for all adults residing in the sponsor's home. However, at the time of our review, ORR policy required Category 3 background checks on all other adults living in the potential sponsor's home only in situations where a home study was required or other special concern was identified. See Appendix A for more detailed information regarding each of the types of checks.

In some circumstances ORR policy prohibits the release of unaccompanied children to sponsors with criminal records. If the background check reveals a history of criminal activity and/or abuse, ORR evaluates this information to determine the sponsor's ability to provide for the child's physical and mental well-being. ORR has recently updated its policy to prohibit the release of children to a Category 2 or Category 3 sponsor if the sponsor or household member has been convicted of certain crimes or has certain substantiated adverse child welfare findings. However, at the time of our review, if a potential sponsor or household member had a criminal history but could ensure the safety and well-being of the child, ORR policy permitted the release of the child to the potential sponsor. ORR may also conduct a home study to better assess the potential sponsor's ability to safely care for the child.

The Role of Federal Field Specialists

OSC stated in the referral letter that "*Enclosure A* [Excel spreadsheet data provided by the whistleblower] indicates that ORR Federal Field Specialists chronically failed to properly

¹ Various ORR policy documents indicate that Category 2 and Category 3 sponsors must be subject to an FBI criminal history check. We did find one ambiguous instruction that ORR should clarify: ORR's Operational Guide, section 2.2.4(5) (effective 9/8/15), states that FBI checks only need to be scheduled if the results of the public records search are ambiguous or a criminal record is found. The information in the ORR Operational Guide may result in Category 2 and 3 sponsors undergoing only an Internet criminal public records check without the additional FBI criminal background check.

² ORR began to require CAN checks for Category 3 sponsors on March 23, 2015. ORR's Operational Guide, section 2.2.4(6), states that a CAN check may be waived "if all documentation needed to approve a safe release has been received and reviewed by the case manager and receipt of the CAN check results is the only item delaying release."

oversee sponsor selection.” When we queried ORR about the role of Federal Field Specialists, we learned that Federal Field Specialists are responsible for overseeing care provider programs in the development and implementation of care and placement plans for unaccompanied children, including making the final decision regarding the release of unaccompanied children. In this context, Federal Field Specialists review release recommendations and other documentation, such as assessments and home studies, to make ORR release decisions. As of October 2015, there were 52 Federal Field Specialists operating in five regional offices. Specifically, OSC stated in the referral letter that the Excel spreadsheet data provided by the whistleblower indicates that Federal Field Specialists improperly released unaccompanied children into the custody of adult sponsors with criminal records.

Scope of OIG Review

The whistleblower reported that the Excel spreadsheet represented children ORR Federal Field Specialists released to sponsors found to have criminal convictions. The whistleblower indicated to OIG that the list was compiled from information maintained by ORR and the Department of Homeland Security’s Immigration and Customs Enforcement. The spreadsheet listed nearly 33,000 individuals the whistleblower believed were unaccompanied children whom ORR placed with sponsors. The whistleblower alleged that of the 33,000 children, 3,675 were associated with approximately 3,600 sponsors who had a criminal record, including 300 sponsors with serious non-immigration-related charges or convictions such as those listed above.

OIG, however, was unable to interpret the original data the whistleblower provided to support the allegations. In response, OSC worked with the whistleblower to produce two additional spreadsheets. OIG had similar difficulties with each subsequent iteration. Finally, OSC scheduled a telephone conversation between OIG staff and the whistleblower for October 9, 2015. Based on this conversation, the whistleblower provided a new and final version of the data. This version, received on October 14, 2015, served as the basis for the OIG review.

Despite these efforts, data deficiencies in the final submission inhibited our analysis. Notably, the nature of the data in the final version was not the same as the data originally provided. This version contained 13,480 records allegedly of children placed with sponsors who had criminal convictions, the vast majority of which were immigration-related offenses. Many of the convictions cited in the original referral (battery, child neglect, contributing to the delinquency of a minor, domestic violence, homicide, and lewd or lascivious acts with minors) were not reflected in the final version. Additionally, the spreadsheet did not contain a column specifically labeled as containing the name of the sponsor.

OIG Review of Select Cases from Whistleblower Allegation

Although the data did not support the allegation, OIG proceeded with a review to determine whether ORR conducted background checks of sponsors in cases linked to specified criminal convictions on the final spreadsheet. We did not review any immigration-related entries or any of the 105 entries in the spreadsheet that were characterized as “unconfirmed criminal alien” charges. The spreadsheet did not include a definition or otherwise explain the meaning of the term “unconfirmed criminal alien,” and, when asked, the whistleblower could not define or

otherwise explain the meaning of the term. OIG identified 25 instances in which children were placed with sponsors who were listed as having been convicted of specific crimes, including possessing, selling, and smuggling marijuana (9), assault (4), larceny (3), disorderly conduct (2), crimes against person (1), flight escape (1), forgery (1), heroin selling (1), sex assault (1), traffic offense (1), and threat terroristic state offense (1).³

OIG sent a data request to ORR to provide case files for the 25 children to determine if ORR had followed its protocol in screening the sponsors. When ORR searched their databases for information about the 25 children, ORR staff reported that 11 children were never in ORR custody, and that they had no record of them. That reduced the sample to 14 cases of children allegedly released to sponsors with specified criminal convictions.

To determine whether ORR staff followed its policies regarding background checks for these 14 children, OIG staff reviewed data in ORR's case tracking system and case files for each child. Based on our review, only 6 of the 14 children were released to sponsors. The remaining eight children were either forcibly or voluntarily returned to their home country. According to ORR records, none of the six children was released to a sponsor with the criminal conviction listed on the spreadsheet. In one of the six cases, our review of the case file showed that the child was released to a sponsor who had been charged with a theft of a low-cost food item and was subsequently fined.⁴

OIG Conclusion

The data OIG received do not substantiate the allegation that the identified children were placed with sponsors with significant criminal backgrounds. Further, the data cannot be used to prove or disprove the OSC conclusion that "ORR Federal Field Specialists chronically failed to properly oversee sponsor selection, potentially endangering the safety and welfare of children." Using the data provided by the whistleblower, it is not possible to determine if there are consistent ORR procedural lapses regarding sponsors' screening that have resulted in children being inappropriately placed with sponsors with significant criminal backgrounds, as alleged. The limitations of the data from the whistleblower do not permit programmatic conclusions. However, using the data supplied from the whistleblower, OIG's analysis demonstrated potential weaknesses in ORR's documentation of the results of the background checks.

In the six case files that we reviewed, we did observe instances of procedural lapses. In particular, documentation to support the assertion that background checks were conducted was not always present in the case files. In addition, some other adults in the home did not receive

³ We excluded one additional case, which was a duplicate entry in the spreadsheet.

⁴ In an attempt to verify that none of the sponsors to which these six children had been released had backgrounds with criminal convictions, OIG conducted its own Internet criminal public records check. These background checks showed no convictions. Understanding that background checks run through the FBI's NCIC may produce results more reliable than Internet-based checks, OIG sought assistance from the FBI. OIG was informed that FBI regulations did not permit the NCIC to be used for these purposes.

background checks, which may have been a violation of the ORR policy in place at the time depending on the circumstances. We encourage ORR to ensure that all Federal Field Staff and ORR grantees consistently adhere to all ORR policies and procedures related to background checks and ensure that appropriate documentation is maintained. We also encourage ORR to ensure that its policies related to background checks are clear and that staff are well trained on the policies. Appendix B contains specific information on the six cases.

OIG recognizes the overall concern for the safety and welfare of unaccompanied children and, specifically, their safe placement with sponsors. OIG consistently provides law enforcement consultation, training, and technical assistance in matters involving ORR and investigative expertise on Significant Incident Reports as appropriate. In addition, OIG has ongoing audit work reviewing selected ORR grantees' compliance with Federal requirements and safety standards. Finally, as effective post-placement follow-up is essential to the protection of unaccompanied children and OIG has previously identified a lack of clarity between HHS and the Department of Homeland Security (DHS) about who is responsible for monitoring children once they are released to sponsors, OIG plans to follow up on an OIG report from 2008 in which we recommended that ORR establish a memorandum of understanding with DHS to clarify the roles and responsibilities of each Department.

Appendix A: Description of Background Checks and Purpose⁵

Type of Background Check	Purpose
Public Records Check	Identifies arrests or convictions of sponsors, adult household members, or others.
Immigration Status Check conducted through the Central Index System (CIS), the immigration database of non-citizens maintained by USCIS	Provides information about immigration court actions and immigration statuses, including information about orders of removal. The information is used primarily to verify immigration status. As follow-up to the Immigration Status Check, the Executive Office for Immigration Review (EOIR) Hotline provides the latest immigration court information.
National (FBI) Criminal History Check, based on digital fingerprints or digitized paper prints	Determines whether a sponsor or adult household member has a criminal history, has been convicted of a sex crime, or has been convicted of other crimes.
Child Abuse and Neglect (CA/N) Check, obtained on a state by state basis as no national CA/N check repository exists	Checks all localities in which the sponsor or household member has resided in the past 5 years.

⁵ Excerpted from *ORR Policy Guide: Children Entering the United States Unaccompanied*, Section 2.5.1 "Criteria for Background Checks." <http://www.acf.hhs.gov/programs/orr/resource/children-entering-the-united-states-unaccompanied-section-2> Accessed on February 9, 2016.

Appendix B: OIG Review of Select Cases

The tables below provide details regarding required background checks conducted on sponsors and the documentation of these checks found in the six case files.

Prior to May 20, 2014, Category 2 and 3 sponsors were required to complete a national (FBI) criminal history check. Effective May 20, 2014 and during the period of our review, these sponsors were no longer required to complete these checks, provided there were no safety concerns. Effective June 17, 2014, program guidance was changed to reflect that all Category 2 and 3 sponsors were required to have a national (FBI) criminal history check. In addition, a new policy was instituted on March 23, 2015, that was outside of the period of our review, which requires Child Abuse and Neglect Checks for all Category 3 sponsors.

The tables also include additional information about background checks conducted on other adults in the household. In addition, background checks on other adults in the household were required only where a special concern was identified (i.e., documented risk to the safety of the child, the child is especially vulnerable, and/or the case is being referred for a mandatory home study). ORR policy requires a home study in certain cases, such as when the unaccompanied child is a victim of a severe form of trafficking, the child has special needs, the child has been a victim of physical or sexual abuse and the child's health or welfare has been harmed or threatened, and/or the sponsor presents a clear risk of abuse, maltreatment, exploitation, or trafficking.

The six cases below were drawn from different ORR facilities in separate regions of the country. In addition, they were all served by different Federal Field Specialists and Case Managers.

Case One. Sponsor: Uncle Released 5/26/2014		
Required background check	Does the case file indicate a background check was done?	Is documentation of a background check in case file?
Public records search	Yes	Yes
Immigration status check	Yes	Yes
Other screening resources		
National (FBI) criminal history check ⁶	Yes	Yes
Background check conducted on other adults residing in the potential sponsor's home	No	No
Home study	No	No

⁶ National (FBI) criminal history checks were not required at the time the unaccompanied child was released to the sponsor (see footnote 7).

Case Two. Sponsor: Family Friend Released 6/15/2014		
Required background check	Does the case file indicate a background check was done?	Is documentation of a background check in case file?
Public records search	Yes	No
Immigration status check	Yes	No
Other screening resources		
National (FBI) criminal history check ⁷	No	No
Child Abuse and Neglect (CAN) check from State databases ⁸	No	No
Background check conducted on other adults residing in the potential sponsor's home	No	No
Home study	No	No

Case Three. Sponsor: Father Released 6/26/2014		
Required background check	Does the case file indicate a background check was done?	Is documentation of a background check in case file?
Public records search	Yes	Yes
Other screening resources		
Immigration status check	Yes	No
Background check conducted on other adults residing in the potential sponsor's home	No	No
Home study	No	No

⁷ National (FBI) criminal history checks were not required at the time the unaccompanied child was released to the sponsor. ORR policy during the period May 20, 2014 – June 16, 2014 did not require potential sponsors to undergo the additional FBI criminal history checks, provided there were no safety concerns, the case raised no unmitigated red flags, the UAC was not especially vulnerable, and/or the case did not require a mandatory home study.

⁸ CAN checks were not required at the time the unaccompanied child was released to the sponsor (see footnote 2).

Case Four. Sponsor: First Cousin Released 10/25/2014		
Required background check	Does the case file indicate a background check was done?	Is documentation of a background check in case file?
Public records search	Yes	Yes
Immigration status check	Yes	Yes
National (FBI) criminal history check	Yes	No
Other screening resources		
Background check conducted on other adults residing in the potential sponsor's home	Yes	No
Home study	No	No

Case Five. Sponsor: First Cousin Released 11/28/2014		
Required background check	Does the case file indicate a background check was done?	Is documentation of a background check in case file?
Public records search	Yes	Yes
Immigration status check	Yes	Yes
National (FBI) criminal history check	Yes	No
Other screening resources		
Background check conducted on other adults residing in the potential sponsor's home	No	No
Home study	No	No

Case Six. Sponsor: Family Friend Released 12/18/2014		
Required background check	Does the case file indicate a background check was done?	Is documentation of a background check in case file?

Public records search	Yes	No
Immigration status check	Yes	Yes
National (FBI) criminal history check	Yes	Yes
Other screening resources		
Child Abuse and Neglect (CAN) check from State databases ⁹	No	No
Background check conducted on other adults residing in the potential sponsor's home	No	No
Home study	No	No

⁹ CAN checks were not required at the time the unaccompanied child was released to the sponsor (see footnote 2).