



ADMINISTRATION FOR **CHILDREN & FAMILIES**

Office of Refugee Resettlement | 330 C Street, S.W., Washington, DC 20201
www.acf.hhs.gov/programs/orr

FIELD GUIDANCE – May 18, 2021

RE: Field Guidance #16 – Clarification That the Individual Service Plan (ISP) and the UC Case Review Are Generally Not Required for Unaccompanied Children (UC) Placed at Emergency Intake Sites (EIS)

GUIDANCE

ORR is issuing this field guidance to clarify that completion of an Individual Service Plan (ISP) or UC Case Review(s) for Unaccompanied Children (UC) at Emergency Intake Sites (EIS) is generally not required, except as specified below, due to the emergency and temporary nature of EIS and unavailability of services required of licensed providers. This Field Guidance #16 is consistent with, and does not supersede or alter, Field Guidance #13, Emergency Intake Site (EIS) Instructions and Standards, issued April 30, 2021. This Field Guidance #16 is in effect until further notice.

As stated in FG #13, EIS are not designed or intended to provide the full range of services available at traditional ORR care provider facilities or even Influx Care Facilities. EIS are designed as short-term, stop-gap facilities opened for a limited period of time (generally under 6 months) to decompress dangerous overcrowding at DHS-run facilities. ORR makes efforts to expedite release of UC from EIS, or as appropriate, transfers to Influx Care Facilities (ICF) or licensed bed facilities.

Individual Service Plan (ISP)

An Individual Service Plan (ISP) “is a plan prepared by the care provider for an individual unaccompanied child that identifies placement and case outcome goals, and delineates services, action steps, and individuals responsible for tasks to achieve the goals.”¹ ISPs are generally required for UC in Influx Care Facilities and Licensed Bed Facilities. See ORR Policy Guide, sections 7.5 and 3.3, respectively.

Because EIS are not designed or intended to provide the full range of services available at traditional ORR care provider facilities or even Influx Care Facilities, and thus many of the individual services generally contemplated under an ISP may be unavailable to UC staying in EIS, ORR has determined that ISPs are generally not required for UC who are staying in an EIS.

However, an ISP may be required (1) where individual services are offered at an EIS, with sufficient on the ground case management support, ORR may determine that a specific site must comply with Influx Care Facility standards as they relate to services, including creation of an ISP for each child; or (2) On an

¹ See ORR Policy Guide, available at [https://www.acf.hhs.gov/orr/policy-guidance/children-entering-united-states-unaccompanied-guide-terms#:~:text=Individual%20Service%20Plan%20\(ISP\)%20%E2%80%94tasks%20to%20achieve%20the%20goals.](https://www.acf.hhs.gov/orr/policy-guidance/children-entering-united-states-unaccompanied-guide-terms#:~:text=Individual%20Service%20Plan%20(ISP)%20%E2%80%94tasks%20to%20achieve%20the%20goals.)

individual case basis, where an ORR Federal Field Specialist (FFS) determines that the safety and wellbeing of a specific child requires that an ISP be completed due to special needs or the unique characteristics of the case.

UC Case Review

The UC Case Review is a form that verifies whether information previously collected remains accurate or otherwise needs to be updated, and it is used to inform the ISP.

Because EIS are short-term, stop-gap facilities, and not designed for the long-term care of children, ORR has determined that the completion of a UC Case Review is generally not required for UC who are placed at an EIS. Case management services at EIS may be overwhelmed with large case ratios and/or temporary staff who may not have sufficient training to expeditiously complete UC case Reviews. To ensure children are expeditiously released (or transferred) from an EIS, ORR has determined that it is in a child's best interest to remove barriers to release. While UC Case Reviews are important assessments that ensure that case information is up-to-date on issues that impact release and inform the ISP, ORR has weighed those issues against the need to expeditiously release or transfer children from an EIS.

However, if the ORR Federal Field Specialist (FFS) determines that a UC Case Review is necessary for the safety and wellbeing of the child prior to release, a UC Case Review must be completed prior to the release (or transfer) of the UC from an EIS. FFS are to consider the totality of the circumstances that updated information is or is not required prior to making a release or transfer decision. FFS should consider the length of time a child has been in EIS care, incident reports that relate to the safety of the child or release; sponsor relationship; and other risk factors when determining whether a UC Case Review is required prior to making a release or transfer decision.