UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANGELICA S., *et al.*, Plaintiffs, v. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, *et al.*, Defendants.	No. 1:25-cv-01405 (DLF)

RESPONSE TO DEFENDANTS' SUPPLEMENT TO THEIR CROSS-MOTION FOR SUMMARY JUDGMENT

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INTRODUCTION

As outlined in Plaintiffs' supplemental memorandum in support of summary judgment, the newly added Plaintiffs have each lost opportunities for release because of the Office of Refugee Resettlement ("ORR")'s unlawful documentation policies and Interim Final Rule ("IFR"). Each has standing to make the same legal claims as the previously named Plaintiffs. Defendants do not dispute the critical facts that establish standing, and do not contest standing at all as to the documentation requirements. Defendants further admit that they *still* have not implemented a sponsorship application form approved by the Office of Management and Budget ("OMB"), nearly four months after receiving such approval. Plaintiffs are therefore entitled to summary judgment for the same reasons articulated in Plaintiffs' prior summary judgment briefing.

ARGUMENT

I. Defendants Do Not Contest Plaintiffs' Standing to Challenge ORR's Documentation Requirements

Defendants do not dispute that the newly added named Plaintiffs have standing to challenge ORR's proof of identification and proof of income policies. *See* Defs.' Suppl. to Cross-Mot. for Summ. J., ECF 109 ("Defs.' Suppl. XMSJ"). Defendants challenge standing only as to the IFR. *Id.*

The newly added child Plaintiffs have standing to challenge ORR's documentation requirements for the reasons explained in Plaintiffs' supplemental brief. *See* Pls.' Suppl. Mem. of Law in Supp. of Mot. for Summ. J. at 7-10, ECF 108 ("Pls.' Suppl. MSJ"). Defendants' supporting declaration confirms several key facts establishing Plaintiffs' standing. *See* Declaration of Toby Biswas ¶ 3, June 15, 2026, ECF 109-1 ("Biswas Decl.") ("Lorenzo's brother reported that he was unable to obtain an acceptable form of ID and that his wife who is a U.S. citizen would proceed as Lorenzo's sponsor instead . . . ORR reminded him that as an adult household member, he would still be required to provide an ID that meets ORR's requirements."); *id.* ¶ 5 (Brian's sponsorship application was stalled between May 2025 and August 2025 because his sponsor's household member parents lacked required identification; his sponsor eventually withdrew in March 2026 after her parents moved back into her home). To the extent Defendants' supporting declaration is silent as to relevant facts, those facts are consistent with Defendants' case file records. *See* Ex. 1, Declaration of Rebecca Wolozin ¶¶ 11-12 & Ex. B, June 23, 2026 ("Wolozin Decl.") (Brian's casefile establishes that Brian's paternal uncle was his first identified potential sponsor but withdrew in favor of Brian's cousin, who stated she had the necessary requirements); *id.* ¶¶ 6-8 & Ex. A (Esmeralda's casefile reflects that her mother advised Esmeralda's case manager that her family friend sponsor "learned he did not meet income requirements and would not pursue the application" and Esmeralda's sister told Esmeralda's case manager "she did not follow through with sponsorship process due [to] lack of documents needed.").

II. Defendants' Case Narratives are Consistent with Plaintiffs' Standing to Challenge the Interim Final Rule

As described in Plaintiffs' supplemental brief, the newly added Plaintiffs had sponsors disqualified because of their immigration status. Pls.' Suppl. MSJ at 8. Lorenzo's brother, for instance, was disqualified because ORR refused to accept his foreign passport without accompanying immigration documentation. Pls.' Suppl. Separate Statement of Undisputed Material Facts ¶ 412, ECF 108-1; *see also id.* ¶ 405 (proof of lawful status required to obtain a state identification or driver's license in South Carolina). Brian's first potential sponsor, his uncle, was disqualified because he lacked identification due to his immigration status. Declaration of Brian G. ¶ 3, ECF 105-5 ("Brian Decl.").

Furthermore, Defendants' assertion that Lorenzo and Brian "express no concerns . . . about disqualification of sponsors based on immigration status itself (as opposed to possessing identification documents)," Defs.' Suppl. XMSJ at 6, is incorrect. Brian explained that his uncle "couldn't even start the sponsorship application process because he is an immigrant like me. He didn't have a work permit, and he didn't have a visa." Brian Decl. ¶ 3. Moreover, Defendants admit that Brian's cousin's sponsorship application was delayed because "Brian's cousin's household members were still pending their IDs on May 30, 2025 *as they were waiting for their immigration statuses to adjust*." Biswas Decl. ¶ 5 (emphasis added); *see also* Defs.' Suppl. XMSJ at 4.

There is no genuine dispute that, as a factual matter, ORR's identification policies result in sponsors being disqualified based solely on their immigration status. Had Lorenzo's brother's passport included proof of work authorization, he would have been allowed to move forward with the process. Because his passport lacked such proof, he could not. That *some* sponsors without lawful status in *some* states might be able to eventually obtain acceptable identification does not change the fact that for sponsors such as Brian's uncle or Lorenzo's brother, their immigration status disqualifies them from even beginning the sponsorship process. This is contrary to ORR's pre-IFR regulation, which prohibits ORR from denying *any* sponsor based solely on immigration status. Newly added Plaintiffs therefore have standing to challenge the IFR. *See* Pls.' Suppl. MSJ at 9-11; *see also* Pls.' Mem. in Supp. of Mot. for Summ. J. at 12-14, ECF 58-1 ("Pls.' MSJ"); Pls.' Opp. to Defs.' Cross-Mot. for Summ. J. at 8-10, ECF 73 ("Pls.' Opp. to Defs.' XMSJ").

In addition, it is undisputed that Esmeralda's mother was afraid that proceeding with the sponsorship process would result in ORR sharing her personal information with immigration enforcement authorities. Defs.' Suppl. XMSJ at 2, 6-7; *see also* Biswas Decl. ¶ 4 ("Esmeralda's mother informed ORR that she was unable to sponsor Esmeralda due to personal safety concerns."). To establish standing, it is not necessary that Esmeralda's mother link this fear to the Interim Final Rule specifically. Esmeralda declared that her mother "knew that things had changed a lot this past year" and was afraid "that ORR would share her information with immigration officers and they would arrest her this time, even though that didn't happen when she sponsored my sister." Declaration of Esmeralda C. ¶ 5, ECF 105-3 ("Esmeralda Decl."). Her sister Elizabeth similarly explained that when their "mom sponsored [Elizabeth], she understood that being a sponsor would not lead to her information being shared with immigration officials in order to detain or deport her. But this time, my mom learned that the process was very different because the rules have changed[.]" Declaration of Elizabeth C. ¶ 4, ECF 105-4 ("Elizabeth Decl."). This is clearly more than "a general fear of increased immigration enforcement and uncertainty about ongoing regulatory changes." Defs.' Suppl. XMSJ at 7.

Esmeralda's mother knows the rules specific to ORR sponsorship have changed and her information is immediately at risk of being shared with immigration enforcement authorities. Her fear of continuing the application process is a predictable result of the IFR's rescission of protections against sharing sponsor information with immigration enforcement authorities. This is a much stronger deterrent factor than the *potential* that information may be shared at one point in the future depending on the final outcome of the regulatory process. *See Diamond Alt. Energy, LLC v. EPA*, 606 U.S. 100, 110, 112, 114, 116-17, 121 (2025) (holding that plaintiff had standing based on "predictable chain of events" and reversing D.C. Circuit opinion finding insufficient evidence of redressability based on third party conduct) (quoting *FDA v. Alliance for Hippocratic Medicine*, 602 U.S. 367, 385 (2024)); *see also id.* at 121 (explaining that States had standing to challenge addition of citizenship question to census based on "likely" results of citizenship question on noncitizen response rates and "[t]he Court did not require the States to produce affidavits or testimony from noncitizens explaining that they would not respond to the census in light of the citizenship question") (citing *Dep't of Commerce v. N.Y.*, 588 U.S. 752, 766-67 (2019)).

Finally, Defendants appear to suggest that Plaintiffs and their putative sponsors must specifically reference the Interim Final Rule in their affidavits to establish standing. Defs.' Suppl. XMSJ at 7. "But for purposes of traceability, the relevant inquiry is whether the plaintiffs' injury can be traced to allegedly unlawful conduct of the defendant, not to the provision of law that is challenged." *Collins v. Yellen*, 594 U.S. 220, 243 (2021) (internal quotation omitted); *see also Gutierrez v. Saenz*, 606 U.S. 305, 315-17 (2025); *Diamond Alt. Energy*, 606 U.S. at 116, 120-21; Pls.' MSJ at 12-13; Pls.' Opp to Defs.' XMSJ 8-10. Plaintiffs have shown that their prospective sponsors are unable to complete the application process because they have been disqualified based on their immigration status and/or are aware that their information can now be shared with immigration enforcement authorities, and the invalidation of the IFR would provide relief from that unlawful conduct. There was no need for lay declarants to use "magic words" to identify the precise legal provision that cause them injury.

Similarly, courts treat the language of non-lawyers and "unsophisticated" litigants more liberally than that of attorneys. *See, e.g.*, *Surowitz v. Hilton Hotels Corp.*, 383 U.S. 363, 373 (1966) (district court erred in dismissing complaint of an immigrant Plaintiff with limited English proficiency or formal education based on her lack of understanding of the legal intricacies of her lawsuit, because the Federal Rules of Procedure "were designed in large part to get away from some of the old procedural booby traps which common-law pleaders could set to prevent unsophisticated litigants from ever having their day in court"); *see also, e.g.*, *Parrish v. United States*, 605 U.S. 376, 388 (2025). The Court should decline to require any specific words or direct reference to specific regulatory documents from unsophisticated declarants to establish standing.

III. Defendants Admit They Are Not Yet Using an OMB-Approved Sponsorship Application Under the Paperwork Reduction Act

Defendants acknowledge that OMB approved a version of the ORR sponsorship application on February 27, 2026 pursuant to the Paperwork Reduction Act ("PRA"), that the OMB-approved version "accepts a broader list of documents for proof of income" than ORR's challenged proof of income policy, and that ORR is not currently using the OMB-approved form or the complete OMB-approved list of accepted documents. Defs.' Suppl. XMSJ at 8. Defendants also admit that each of the newly added named Plaintiffs had sponsors attempt to complete the application process prior to February 2026. Biswas Decl. ¶ 3 (both Lorenzo's brother and his wife disqualified as sponsors in January 2026); *id.* ¶ 4 (Esmeralda exhausted sponsorship options in October 2025); *id.* ¶ 5 (Brian's cousin submitted a sponsorship application in May 2025).

Defendants have provided no justification for ORR's continued refusal to follow the PRA's requirements even as to an information collection request the *agency itself* proposed and submitted for approval to OMB in August 2025. *See* Defs.' Status Report in Response to the Court's Order of Feb. 24, 2026 at 1-2, ECF 81. Nor have Defendants provided any expected timeline for compliance with the PRA, despite representing to the Court *four months ago* that "OMB has completed its review of the information collection request, and the collection has been approved." *Id.* at 2; *see* Biswas Decl. ¶ 9 ("Currently, a publication date for Version 19 has not been set."). The agency violates the PRA each day that it continues to use an unauthorized version.

At a minimum, ORR's unauthorized information collection must be held unlawful and set aside as contrary to law. 5 U.S.C. § 706. Vacatur of ORR's unauthorized information collection is especially appropriate here where the agency has already determined that it should expand its proof of income documentation options, submitted that proposal to OMB, and obtained OMB approval, but inexplicably continues to operate in violation of the PRA. Biswas Decl. ¶ 7.

As Plaintiffs discussed in their supplemental brief, the purpose and text of the PRA prohibit an agency from increasing the burden on sponsors by unilaterally narrowing the OMB-approved options for responding to an information collection. Pls.' Suppl. MSJ at 4-7; *see also* Defs.' Suppl. XMSJ at 8 ("In Version 18, ORR accepts only a limited set of documentation for proof of income."); Elizabeth Decl. ¶ 7 (Esmeralda's family friend sponsor's income was deemed insufficient and he was not permitted to include evidence of support from Esmeralda's mother). Defendants' assertion that "ORR is not collecting any information or documents not approved for collection by OMB," Defs. Suppl. XMSJ at 8, continues to misunderstand the purpose of the PRA. OMB approved a proof of income information collection requirement that provides sponsors flexibility to establish their financial capacity through multiple different types of documentation, including through evidence of financial support by another person. Biswas Decl. ¶ 7. OMB *did not* approve ORR's current restrictive list of proof of income documents.

Indeed, this case bears striking similarities to the information collection at issue in *Saco River Cellular, Inc. v. FCC*, where the D.C. Circuit held that the Federal Communications Commission violated the PRA by requiring evidence of firm financial commitment to meet specific requirements and rejecting alternative evidence of financial commitment. 133 F.3d 25, 28, 32-33 (D.C. Cir. 1998). Under OMB regulations, where an agency lacks OMB approval, it must "permit respondents to prove or satisfy the legal conditions in any other reasonable manner." *Id.* at 33 (quoting 5 C.F.R. § 1320.6(c)).

Defendants' belated attempt to distinguish *Saco River Cellular* is unavailing. The D.C. Circuit made clear that its holding was based on the substantive requirements of the PRA and that reconsideration of the application was required by law, not a matter of agency discretion. *See id.* at 31 ("Did the Commission Violate the PRA?"); *id.* at 31 ("[T]o the extent that § 22.917(b) mandated a collection of information, the Commission could not lawfully penalize PortCell for failing to comply with it."); *id.* at 31-32 (rejecting multiple arguments that the agency did not violate the PRA). Notably, the D.C. Circuit "conclud[ed] that the Commission was obliged" to remedy its violation even though the unauthorized information collection was consistent with federal regulation and the relevant statute required a firm financial commitment. *Id.* at 32-33 (noting that "the regulation imposes both a substantive and a reporting requirement" and "[t]he latter requirement is a collection of information; therefore, the Commission may not punish a selectee for failing to provide the information unless it has first obtained a valid OMB control number").

In addition to vacatur under the Administrative Procedure Act ("APA"), an injunction is justified here to ensure that ORR fulfills its duties under the PRA and does not continue to unlawfully penalize sponsors who were required to respond to an unauthorized information collection. The Court retains general equitable authority in APA cases. *See* 5 U.S.C. §§ 703, 706(1); *Nat'l Mining Ass'n v. U.S. Army Corps of Eng'rs*, 145 F.3d 1399, 1408-10 (D.C. Cir. 1998) (affirming injunction against agency regulation); *Megapulse, Inc. v. Lewis*, 672 F.2d 959, 971 (D.C. Cir. 1982) ("This action was properly brought under the APA, and injunctive relief, preliminary or permanent, is available in the district court."); *Ramirez v. ICE*, 568 F. Supp. 3d 10, 22 (D.D.C. 2021) ("[T]he APA explicitly contemplates that injunctive relief may be proper when an APA violation is identified.") (citing 5 U.S.C. § 703); *see also Califano v. Yamasaki*, 442 U.S. 682, 705 (1979) ("Absent the clearest command to the contrary from Congress, federal courts retain their equitable power to issue injunctions in suits over which they have jurisdiction."). For the reasons stated in their memorandum in support of summary judgment, Plaintiffs meet the criteria for injunctive relief. Pls.' MSJ at 41-44.

Although vacatur and remand is the ordinary remedy in an APA case, "it is also well established that this principle does not apply when 'there is only one rational course for the Agency to follow upon remand.'" *Huff v. Vilsack*, 195 F. Supp. 3d 343, 362 (D.D.C. 2016) (quoting *Berge v. United States*, 949 F. Supp. 2d 36, 43 (D.D.C. 2013)). Here, ORR is obligated by law to remedy its PRA violations as to sponsors who were subjected to an unauthorized information collection. *Saco River Cellular*, 133 F.3d at 31-32. Further, ORR has offered no indication that it will voluntarily comply with its obligations under the PRA. To the contrary, the agency has persisted in violating the PRA even after receiving OMB approval of its sponsorship application, inevitably increasing the number of sponsors subjected to its unlawful information collection.

Courts in this circuit have granted affirmative relief on APA claims where agencies acted contrary to law and no different decision is possible on remand. *See Abramowitz v. Lake*, 803 F. Supp. 3d 1, 15 (D.D.C. 2025) (finding permanent injunction appropriate on claim under the APA related to unlawful removal from office); *Ramirez*, 568 F. Supp. 3d at 27 (granting injunctive relief in light of "pattern 'of agency recalcitrance and resistance to the fulfillment of its legal duties'") (quoting *Cobell v. Norton*, 240 F.3d 1081, 1109 (D.C. Cir. 2001)); *Huff*, 195 F. Supp. 3d at 364 (ordering agency to approve application because "given the procedural history of this matter, there is 'only one rational course' for the agency to follow") (quoting *Berge*, 949 F. Supp. 2d at 43). The cases relied on by Defendants, by contrast, involved situations where the agency could have exercised its discretion differently on remand. *See N. Air Cargo v. U.S. Postal Serv.*, 674 F.3d 852, 861 (D.C. Cir. 2012) (remand rather than injunction appropriate where "agency's decision, although applying the statute, lacked any careful analysis or explanation"); *Bennett v. Donovan,* 703 F.3d 582, 589 (D.C. Cir. 2013) (noting "the prerogative of the agency to decide in the first instance how best to provide relief"). Alternatively, or in addition, the Court may grant declaratory relief regarding ORR's obligations under the PRA. *See* Pls.' MSJ at 45.

CONCLUSION

Plaintiffs respectfully request that the Court grant their motion for summary judgment and deny Defendants' cross-motion.

Date: June 25, 2026

Respectfully submitted,

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EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANGELICA S., *et al.*, Plaintiffs, v. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, *et al.*, Defendants.	No. 1:25-cv-01405 (DLF)

DECLARATION OF REBECCA WOLOZIN

I, Rebecca Wolozin, declare as follows:

1. I am counsel for Plaintiffs in the above-captioned case.

2. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.

3. The Office of Refugee Resettlement ("ORR") maintains casefiles for children in its custody. ORR has a process for attorneys to request the records of their clients who are or were in ORR custody by submitting Form A-5, Authorization for Release of Records, available on ORR's website.

Esmeralda C.

4. On April 10, 2026, I submitted a signed Authorization for Release of Records and Notice of Representation to ORR's records request email address for Esmeralda C.

5. On April 15, 2026, I received Esmeralda's casefile in response to my request. The casefile includes redactions made by ORR.

6. Attached as Exhibit A is a true and correct copy of two excerpts of this casefile, with additional redactions for personally identifying information, including names, identifying numbers, country of origin, ORR program names and locations, birthdates, and personal medical and immigration case details.

7. The first casefile excerpt is an ORR Transfer Request Form approved January 15, 2026, which states in relevant part: "The UAC . . . has been seeking reunification primarily with her mother and adult sister . . . All reunification options identified by the family have been explored; however, none have been able to meet the requirements necessary to proceed with release. . . The mother then identified a family friend [Redacted], as another potential sponsor . . . On 10/24/2025, [Redacted] informed the program he was unable to proceed after considering the responsibilities of sponsoring both the UAC and her young child. On 10/27/2025, the mother advised CM that [Redacted] **also learned he did not meet income requirements** and would not pursue the application." (emphasis added).

8. The second casefile excerpt is a Phone Call record by Esmeralda's Case Manager dated February 11, 2026, which states that the Case Manager spoke to Esmeralda's sister and "minor's sister stated she did not follow through with sponsorship process due lack of documents needed."

Brian G.

9. On April 20, 2026, I submitted a signed Authorization for Release of Records and Notice of Representation to ORR's records request email address for Brian G.

10. On April 28, 2026, I received Brian's casefile in response to my request. Brian's casefile included redactions made by ORR for sponsor information.

11. Attached as Exhibit B is a true and correct copy of an excerpt of this casefile, with additional redactions for personally identifying information, including names, identifying numbers, country of origin, and ORR program names and locations.

12. The casefile excerpt includes Brian's Case Manager's Progress Notes dated May 3, 2025 and May 5, 2025. The May 3, 2025, Progress Note indicates that Brian's uncle was identified as a potential sponsor and expressed a desire to complete the sponsorship process. Brian's case manager told his uncle "that the Unification Specialist will be in touch with them regarding the necessary documentation." The May 5, 2025, Progress Note indicates that, after speaking with the ORR Unification Specialist, Brian's uncle informed ORR that he would prefer Brian's cousin to proceed with sponsorship instead. Brian's cousin "stated she has the necessary requirements."

I declare under penalty of perjury that the foregoing is true and correct to the best of my understanding and belief.

Executed on this 23rd day of June, 2026, in Ocean City, MD.

Rebecca Wolozin

Rebecca Wolozin

EXHIBIT A

Transfer Request

UAC Basic Information

First Name: [redacted]

Last Name: [redacted]

[redacted]

AKA:			
Status:	DISCHARGED		
Date of Birth:	[redacted]	**Sex:**	F
A No.:	[redacted]	**LOS:**	134
Age:	17	**Current Program:**	[redacted]
Country of Birth:	[redacted]	**Admitted Date:**	9/10/2025

Transfer request

Minor's Profile:

Height(ft & inches):	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]		
Identification Marks:			

Transfer Request:

Type of Program Requested:	Long Term Foster Care	**Requested Date:**	12/10/2025
Requesting Party:	[redacted]		
Requester Name:	[redacted]		
Requester Title:	Case Manager		
Requester Phone:	4[redacted]		

Case Coordination:

Concur with Requesting Party?	◉ Yes ○ No		
Comments:	Referral was received by DPO team on 12/12/25. 1/5/26-The [redacted] has accepted the above-named Unaccompanied Child. On 1/15/26, minor accepted placement.		
Type of Program Recommended:	Long Term Foster Care	**Case Coordinator Proposed Program:**	[redacted]
Case Coordinator Name:	[redacted], MSW		
Recommended Date:	1/15/2026		

Reason for Transfer Request:

Shelter & Foster Care Only:	☑ Standard Placement	**Secure & Staff Secure Only**	☐ Convicted as Adult ☐ Adjudicated Delinquent ☐ Criminal Charges ☐ Chargeable
Any Program Type:	☐ To provide a less restrictive setting (transfer only) ☐ To provide a more restrictive setting (transfer only) ☐ Minor's Medical Health ☐ Minor's Mental Health ☐ Violent/Threatening Behavior	☐ Disruptive Behavior ☐ Minor's Safety ☐ Flight Risk ☐ Emergency Influx	
Has the Minor's Attorney Been Contacted?	○ Yes ◉ No	**Attorney Phone:**	
Attorney of Record:			

Casefile Summaries

Information Relating to Minor's casefile	☐ Pregnancy ☐ Injury ☐ Illness ☐ Non-diagnosed Behavior/Illness with no Medications ☐ Non-diagnosed Behavior/Illness with Medications	☐ Diagnosed Behavior/Illness with no Medications ☐ Diagnosed Behavior/Illness with Medications ☐ Non-violent Conviction ☐ Non-violent Charge ☐ Charge(s) Dropped

1/15/2026,[redacted], LMSW, LSWAIC: UAC has demonstrated ongoing behavioral and emotional stability throughout their placement in shelter care. The UAC consistently participates in all scheduled shelter activities and exhibits the capacity to establish and maintain selective, pro-social peer relationships marked by mutual support and minimal interpersonal conflict. UAC attends weekly individual clinical sessions in addition to group therapy sessions, with no concerns noted regarding attendance, engagement, or participation. During individual sessions, UAC effectively identifies and utilizes appropriate coping strategies and engages in goal-oriented, reflective discussion. UAC demonstrates emerging insight into emotional regulation, communication styles, and interpersonal functioning. UAC is actively participating in psychoeducational interventions focused on healthy parenting dynamics and demonstrates appropriate comprehension and application of the material within the therapeutic setting. Overall, the UAC presents as stable, cooperative, and receptive to continued therapeutic intervention. 12/11/2025,[redacted], LMSW, LSWAIC: The UAC has maintained behavioral and emotional stability while in shelter care. Participation in all scheduled shelter activities

Minor's Medical/Mental Health Summary:	has been consistent, and the UAC demonstrates the ability to form and maintain selective, pro-social peer relationships characterized by mutual support and low interpersonal conflict. The UAC attends weekly individual clinical sessions as well as group sessions, with no concerns noted regarding engagement or participation. During individual sessions, the UAC identifies and practices appropriate coping strategies and engages in goal-directed, reflective dialogue. The UAC demonstrates developing insight into emotional regulation, communication patterns, and interpersonal dynamics. The UAC is currently engaged in psychoeducation focused on healthy parenting dynamics and displays an appropriate level of comprehension and application of the material within the therapeutic setting. Overall, the UAC presents as stable, cooperative, and receptive to ongoing therapeutic intervention. [redacted]

Behavior Summary: (history of: flight risk, aggressive/assaultive & sexually inappropriate behaviors)

1/15/2026, [redacted], LMSW, LSWAIC: UAC has not demonstrated any flight risk, aggressive, assaultive, or sexually inappropriate behaviors while in shelter care 12/11/2025, [redacted], LMSW, LSWAIC: UAC has not displayed or engaged in any flight risk, aggressive/assaultive and or sexually inappropriate behaviors while in shelter care.

Current Status of Family Reunification:	The UAC was admitted into care on 09/10/2025 and has been seeking reunification primarily with her mother and adult sister, who both reside in [redacted] All reunification options identified by the family have been explored; however, none have been able to meet the requirements necessary to proceed with release. On 09/17/2025, the mother informed CM that she was unable to sponsor the UAC due to personal safety concerns. She provided the contact information for the UAC's adult sister, [redacted], as a potential sponsor. FFS attempted contact with the sister on 09/12/2025 and 09/23/2025 with interpreter assistance. On 09/23/2025, after reviewing the responsibilities of sponsorship, the sister declined to move forward. The mother then identified a family friend, [redacted], as another potential sponsor. The referral was submitted to DSA-FFS on 10/02/2025, with outreach attempts made on 10/09/2025 and 10/17/2025. On 10/24/2025, [redacted] informed the program he was unable to proceed after considering the responsibilities of sponsoring both the UAC and her young child. On 10/27/2025, the mother advised CM that [redacted] also learned he did not meet income requirements and would not pursue the application. On 10/30/2025, the mother reported there were no additional individuals available or willing to serve as sponsors. After discussing this with her mother and sister, the UAC expressed her desire to move forward with LTFC. This case was staffed with assigned FFS [redacted] and Case Coordinator [redacted], who are in agreement that LTFC is the most appropriate permanency plan for the UAC. At this time, due to the documented sponsor declines between 09/12/2025 and 10/30/2025 and the absence of any viable sponsor, it is in the UAC's best interest to proceed with LTFC. The program is requesting approval to move forward with the LTFC referral. On 1/05/2026, the program received an email confirming that the LTFC provider, [redacted] had accepted the UAC. On the same date, the Case Manager (CM) emailed [redacted] to schedule a pre-placement call with the treatment team and the UAC. On 1/08/2026, a pre-placement call was scheduled for 1/13/2026. The CM facilitated the video call, during which the UAC met with the LTFC program staff and foster parents. UAC's baby UAC [redacted] was unable to attend the virtual meeting due to being in isolation. The LTFC program reviewed program rules and provided information about the foster home. The UAC was given the opportunity to ask questions; however, due to the number of participants on the call, the UAC reported feeling shy to speak. Lead Case Manager (LCM) AF provided guidance and support to encourage the UAC to share about herself and ask questions. CM NJ emailed assigned analyst LC updated medical documents as well as [redacted] who had also requested them on 1/13/2026 prior to the virtual meeting. Following the call, LCM AJ, Lead Clinician (LC) SG, and CM NJ followed up with the UAC to assess her feelings about the meeting. The UAC was encouraged to take time to consider whether she wanted to accept the placement and was given until 1/16/2026 to make a final decision.
Immigration Court Status:	[redacted]

Case Manager Comments

Case Manager Name:	[redacted]		
Case Manager Comments:	At this time, the program is recommending a LTFC placement setting for this UAC. Since the UAC arrived to the shelter on 9/10/2025 there are no viable sponsors.		
Case Manager Suggests Transfer?:	(●) Yes ( ) No	**TMS Historical Transfer Request?:**	
Date of Case Manager Comments:	12/10/2025		

ORR/DCS Decision

Comments:	Transfer Approved		
Decision:	( ) Pending (●) Approve ( ) Disapprove ( ) Remanded, please provide info as detailed in comments	**Date of Decision:**	1/15/2026
Name of ORR Decision Maker:	[redacted]		

Transfer Packet (for each minor)

Please follow checklist in the Transfer Procedures when completing minor's transfer packet, check the checkbox to indicate the packet is completed. ☐

List of Minor's Belongings (be sure to include medication and explain dosage in medical/mental health summary)

COA - COV

Request Type	(●) Change of Address ( ) Change of Value	Transfer Sch. to Take Place on:	
Next Sch. Court Appearance for this Juvenile is:			

Reason for less than 48 hours notice to ICE (if applicable) :

Good cause exists to change venue in this matter pursuant to 8 C.F.R. & 1003.20 (b) for the following reason(s);

☐ ORR has decided to relocate the respondent to an area where space is available/ appropriate services can be provided, since Juvenile detention space is limited in

☐ The minor has a special need (e.g., pregnancy of juvenile, medical needs, etc.), please specify

	☐ Other, please specify		
Departure/Arrival Information			
Departure Date:	1/22/2026	**Departure Time:**	05:00 AM
Transporting Staff Name:	[redacted]		
Transporting Staff Title:	Youth Care Worker		
Transporting Staff Comments:			
Arrival Date:		**Arrival Time:**	
Receiving Staff Name:			
Receiving Staff Title:			
Receiving Staff Comments:			

[redacted]

Phone Call

Unaccompanied Children Programs of CCP: Unaccompanied Children Programs

Client Name	Date	Start Time	End Time	Duration
[redacted]	2/11/2026	02:50 PM	03:00 PM	10 min

Additional Information

With:	[redacted] (sister)	**Subject:**	Introduction/Follow up questions
Type:	Phone call to		

Related Narrative

CM was able to contact the minor's sister. CM asked questions regarding potential sponsorship. The minor's sister stated she did not follow through with sponsorship process due lack of documents needed. She states they agreed on receiving the minor when she ages out of LTFC program.

Signatures

Performed By: [redacted], Case Manager

02/11/2026
Date

EXHIBIT B

[redacted]

Progress Note

Minor's Name: [redacted]	Date of Service: 05/03/2025	
Type of Service: ☐ Case Management (general) ☐ CM Admission ☒ CM Sponsor Identification ☐ Discharge ☐ Individual Counseling ☐ Family Session ☐ Initial FH Visit ☐ Day FH Visit ☐ Medical (general) ☐ Education (general) ☐ PSA (general) ☐ PSA Orientation	Start Time: 10:00 AM End Time: 11:00 AM Total Time: 60 minutes	Type of Contact: ☐ Face-to-Face ☒ Telephone ☐ Virtual/Other Location of Service: [redacted]

I. Persons Present (Names of those present and relationship to persons served or family):

Sponsor: [redacted]
Case Manager: [redacted]

II. ISP Goal/Objective (Domain and brief statement of goal(s)):

The objective of this call was to contact the minor's potential sponsor, [redacted], and explain the reunification process and request identification documentation, which include birth certificates for the minor, minor's father, and minor's paternal grandmother, the sponsor's ID, and sponsor's birth certificate, to update the case. Case Manager explained the role of the Unification Specialist and informed them that the Unification Specialist will be in touch with them regarding the necessary documentation. Case Manager explained their role with the minor including providing updates regarding the case to the minor, evaluate the services given to the minor, and overall making sure the child's well taken care of during the process. The sponsor will wait for the Unification Specialist to be in contact with them.

III. Are there any new risk behaviors or significant changes in the life of the minor since last visit, as applicable?

☒ N/A, No Known Change ☐ Yes, Explain Below:

IV. Services Provided:

Assigned Case Manager had the first call with the potential sponsor to verify their relationship with the minor and to see if [redacted] agree being the minor's sponsor. Case Manager provided potential sponsor with the current requirements for sponsorship and asked potential sponsor if he would like to move forward with sponsorship of the minor. Potential sponsor stated they do not have legal status in the United States but potential sponsor stated that he would like to being the sponsorship process as the minor's sponsor. Potential sponsor stated they are the minor's paternal uncle. Case manager explained the unification process and the role of both the Unification Specialist and Case Manager. Potential sponsor voiced understanding and will send the identification documents which included the Birth Certificates of the minor and the sponsor, and ID of the sponsor. The potential sponsor verbalized understanding and agreed to comply with the provisions outlined. The Sponsor is pending contact from the Unification Specialist.

[redacted]

V.	Response to intervention or service (by persons served or other persons present): The sponsor told the Case Manager that they understood the process and the role of both the Case Manager and Unification Specialist. Case Manager obtained the information required to complete the initial identification of the sponsor. Case Manager informed sponsor that the Unification Specialist will contact the sponsor regarding the needed documentation for the case.
VI.	Progress: ☒ Improvement ☐ Deterioration ☐ No Change, Briefly Describe: The potential sponsor is the minor's paternal uncle named [redacted] who resides at [redacted]. Their contact number +1 [redacted]. The sponsor arrived in the United States in May 2024 to find a better, secure life. Potential sponsor maintained a relationship with the minor via phone and video calls. The sponsor reports that he will look after the needs of the minor in order to achieve a better quality of life.
VII.	Does the Individual Plan needs to be modified? No

Next visit/session and follow-up plan for identified issues and level of progress:

Case Manager will follow up on the information and documents provided by the potential sponsor. Case Manager will aid the Unification Specialist throughout the process when needed. The Case Manager will be in contact with the minor and update the minor throughout the case while ensuring the child's well being. The Case Manager will continue to work with the minor such that they are involved in the process of the case and keep them informed every step of the way during the reunification process.

[redacted] Case Manager

Employee ......e and Credentials

[redacted]

05/03/2025

Employee Signature **Date**

[redacted] - Lead Case Manager

Supervisor's Name

[redacted]

05/03/2025

Supervisor's Signature **Date**

[redacted]

Progress Note

Minor's Name: [redacted]	Date of Service: 05/05/2025	
Type of Service: ☐ Case Management (general) ☐ CM Admission ☒ CM Sponsor Identification ☐ Discharge ☐ Individual Counseling ☐ Family Session ☐ Initial FH Visit ☐ Day FH Visit ☐ Medical (general) ☐ Education (general) ☐ PSA (general) ☐ PSA Orientation	Start Time: 10:00 AM End Time: 10:50 AM Total Time: 50 minutes	Type of Contact: ☐ Face-to-Face ☒ Telephone ☐ Virtual/Other Location of Service: [redacted]

I. Persons Present (Names of those present and relationship to persons served or family):

Sponsor: [redacted]
Case Manager: [redacted]

II. ISP Goal/Objective (Domain and brief statement of goal(s)):

The objective of this call was to contact the minor's potential sponsor, [redacted], and explain the reunification process and request identification documentation. The documents include birth certificates for the minor, potential sponsor, and birth certificates trail showing relationship between minor and sponsor as well as the sponsor's identification which will be used to update the case. Case Manager explained the role of the Unification Specialist and informed them that the Unification Specialist will guide them through the sponsor vetting process and the necessary documentation. Case Manager explained their role with the minor including providing updates regarding the case to the minor, evaluate the services given to the minor, and overall making sure the child's well taken care of during the process. The sponsor reported that they have already been contacted by the Unification Specialist and started the sponsor vetting process.

III. Are there any new risk behaviors or significant changes in the life of the minor since last visit, as applicable?

☒ N/A, No Known Change ☐ Yes, Explain Below:

IV. Services Provided:

Assigned Case Manager previously identified the minor's paternal uncle during the intake process on 05/03/2025 as the potential sponsor for the minor. When the assigned Unification Specialist contacted the previously identified sponsor on 05/03/2025 to begin the sponsor vetting process, he verbally stated to the Unification Specialist that he would prefer if his niece, the minor's paternal cousin, [redacted] be the sponsor of the minor. Case Manager spoke with minor's uncle and confirmed that he no longer wants to be the sponsor of the minor. Case Manager had the first call with the potential sponsor [redacted] to verify their relationship with the minor and to see if she agree being the minor's sponsor. Case Manager provided potential sponsor with the current requirements for sponsorship and asked potential sponsor if she would like to move forward with sponsorship of the minor. [redacted] stated she has the necessary requirements and would like to being the sponsorship process as the minor's sponsor.

[redacted]

Potential sponsor stated she is the minor's paternal first cousin. Case manager explained the unification process and the role of both the Unification Specialist and Case Manager. Potential sponsor voiced understanding and will send the identification documents which included the birth certificates of the minor, the sponsor, and other parties to prove relationship to the minor as well as the identification of the sponsor. The potential sponsor verbalized understanding and agreed to comply with the provisions outlined. The sponsor has already been contacted by the Unification Specialist and will provide necessary documentation.

V. **Response to intervention or service (by persons served or other persons present):**

The sponsor told the Case Manager that they understood the process and the role of both the Case Manager and Unification Specialist. Case Manager obtained the information required to complete the initial identification of the sponsor. Case Manager informed sponsor that the Unification Specialist will continue contact with the sponsor regarding the needed documentation for the case.

VI. **Progress:** ☒ Improvement ☐ Deterioration ☐ No Change, Briefly Describe:

The potential sponsor is the minor's paternal first cousin named [redacted] who resides at [redacted]. Their contact number +1 [redacted]. The sponsor was born in the United States and is a U.S. Citizen. Potential sponsor maintained a relationship with the minor via phone and video calls, and in person visits to [redacted] The sponsor reports that she will look after the needs of the minor in order to achieve a better quality of life.

VII. **Does the Individual Plan needs to be modified?** No

Next visit/session and follow-up plan for identified issues and level of progress:

Case Manager will follow up on the information and documents provided by the potential sponsor. Case Manager will aid the Unification Specialist throughout the process when needed. The Case Manager will be in contact with the minor and update the minor throughout the case while ensuring the child's well being. The Case Manager will continue to work with the minor such that they are involved in the process of the case and keep them informed every step of the way during the reunification process.

[redacted] - Case Manager

Employee Name and Credentials

[redacted]

05/05/2025

Employee Signature **Date**

[redacted] - Lead Case Manager

Supervisor's Name

[redacted]

[redacted]

[redacted] 05/05/2025

Supervisor's Signature **Date**