

A Timeline: Tracking How the Second Trump Administration Is Rolling Back Protections for Unaccompanied Children

Executive Summary

In January 2025, the second Trump Administration began implementing its vision of a rapid overhaul of the U.S. immigration system. It soon declared a national border emergency, abruptly narrowed access to asylum and refugee protection, and launched whole-of-government efforts to detain and deport millions of people. The Administration articulated an avowed commitment to combatting child trafficking and locating and protecting thousands of unaccompanied children it deemed “lost” by the prior Administration. Instead, unaccompanied children have grown ever more vulnerable as the Administration leverages widespread enforcement and policy reforms to target children, their families, and longstanding child welfare safeguards designed to protect them.

Abandoning decades-long, bipartisan measures to prevent the return of unaccompanied children to harm, the Administration has worked systematically to eviscerate child welfare and anti-trafficking protections for these children as enshrined in the Homeland Security Act of 2002, the Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA), the *Flores* Settlement Agreement, and related regulations, in efforts to remove children and their families from the United States. These longstanding but imperiled protections help ensure that unaccompanied children are treated with regard for their particular vulnerability as children in the immigration system, including by transferring their care away from federal immigration authorities and to the federal government’s child welfare agency. These protections require the government to safely screen unaccompanied children at U.S. borders for protection needs and ensure they are cared for in safe settings that account for children’s best interests and unique developmental, psychosocial, and physical needs. They support children’s reunification with parents and other safe caregivers in the United States, and provide for access to legal representation, psychosocial services, and independent child advocates so children can meaningfully participate in their cases and have their protection claims fully and fairly considered. They also include repatriation safeguards to ensure children who are ordered removed or voluntarily departing the country are not sent back to harm.

Through dozens of policies spanning federal agencies, and the signing into law of unprecedented new authorities and funding directives, the Administration is erecting new and mounting barriers to children’s safety and eroding foundational protections at every turn. In the process, it is exposing thousands of children to forced returns to grave harm—in violation of U.S. and international law and our nation’s deeply held values. These policies are generating fear, exacerbating trauma, and increasing risks for unaccompanied children at every stage of their search for protection, including by:

- **terminating funding** for vital legal services;
- **seeking forced returns** of hundreds of children with protection needs, without due process and consideration of their legal claims;
- **shuttering the Central American Minors (CAM) Program** and other refugee and protection pathways for children with dire protection needs;
- **eroding protection screenings** and safe reception of children at U.S. borders;
- **pursuing summary removal** of unaccompanied children throughout the country;
- **restricting sponsorship** and children’s safe reunification with parents and other loved ones;

- **permitting broad information sharing** for immigration enforcement purposes and blurring the roles of the Department of Homeland Security and Office of Refugee Resettlement;
- **creating new immigration and law enforcement initiatives** targeting children and sponsors;
- **directing the termination of the federal Family Reunification Task Force charged with reunifying and supporting families** separated by the prior Zero Tolerance Policy and undertaking new separations;
- **rescinding deferred action for abused and abandoned children** granted immigration relief and exposing those children to deportation orders;
- **imposing new and soaring fees** to apply for humanitarian protection;
- **seeking termination of minimum child welfare standards** that protect children in the immigration system and expanding family detention;
- **conducting enforcement actions** at immigration courts, schools, churches, and hospitals; and
- **eviscerating child-sensitive safeguards** and procedures in immigration court.

During the first Trump Administration, Kids in Need of Defense (KIND) maintained and published a [timeline](#) of administrative efforts to roll back protections for unaccompanied children to bring to light the profound and cumulative effects of new policies on the safety, well-being, and daily lives of unaccompanied children. As the Trump Administration rapidly revives and steadily promulgates new policies, efforts to renew the United States’s commitment to protecting children has become only more urgent. With this in mind, KIND is restarting its timeline project, with plans to regularly maintain the document to keep pace with new and emerging changes. In documenting these threats to children and making their need for protection visible, KIND aims to spur collective efforts to protect, restore, and expand necessary safeguards for unaccompanied children to ensure every child’s safety and ability to thrive.

JANUARY 2025



January 20

Suspension of Refugee Resettlement and Child Refugee Program

Citing emergency authority, the president issues an executive order declaring that the entry of refugees is detrimental to U.S. interests and suspends the U.S. Refugee Admissions Program, with only rare case-by-case exceptions, pending ongoing review. Processing of refugee applications and travel plans of approved refugees, including Unaccompanied Afghan Minors, are abruptly halted and prolong safety risks and family separation for thousands of children and families. The suspension also halts the Central American Minors (CAM) Program, which was first created in 2014 to allow certain children to apply for refugee protection or humanitarian parole without having to undertake dangerous journeys to the United States. Related executive orders direct termination of “categorical” parole programs and curtail access to humanitarian parole into the United States for children facing immediate risks while their refugee applications are considered or who are in need of assistance but do not qualify for refugee status. Consequently, many children remain in harm’s way and unable to access protection.



January 20

Termination of Family Reunification Task Force

In an executive order rescinding several policies of the prior Administration, the president directs the termination of the Family Reunification Task Force, which was created in 2021 to help reunify and provide support to thousands of families separated under the Trump Administration’s Zero Tolerance Policy. The Task Force’s potential elimination undermines efforts to reunite separated families, hundreds of whom remain apart more

than seven years after the Zero Tolerance Policy was first announced. It also raises the potential for violations of a related legal settlement in the case of *Ms. L v. ICE*, which halted the Zero Tolerance Policy and provides certain processes under which separated parents and children can reunify, apply for humanitarian protection, and receive limited services. Other executive orders directing agencies to prioritize criminal prosecutions for unlawful entry and continued unauthorized presence heighten the risk of continued and renewed family separations, as similar efforts served as the basis of the Zero Tolerance Policy.



January 20

Elimination of Guidance Limiting Immigration Enforcement in Courts and Protected Areas

The Department of Homeland Security (DHS) rescinds earlier guidance creating limitations on immigration enforcement actions by Immigration and Customs Enforcement (ICE) in “protected areas,” such as schools, hospitals, places of worship, and sites providing social services, among others. New directives advise ICE to use “common sense” when conducting civil enforcement actions, providing broader discretion to conduct enforcement in and around areas where children may be present. The dilution of protective policies that have been in effect in various forms since 2011 risks trauma and toxic stress for children who may fear or witness enforcement actions. The new policies also impact public health and safety by creating a broad chilling effect that undermines the ability of children and families to conduct daily activities such as going to school, attending doctor’s appointments, or accessing other basic services. Additional guidance rescinds limitations on enforcement actions in or near courthouses and provides ICE broader latitude to conduct such enforcement, including in and around immigration courts where children and families have hearings for asylum and other legal relief.



January 20

Expansion of Information Sharing about Unaccompanied Children

In an executive order, the president directs the attorney general and the secretaries of DHS and the Department of Health and Human Services (HHS) to take all actions to stop trafficking and smuggling of children into the United States, including through information sharing to assist these efforts. Although tailored information sharing may be appropriate in certain cases consistent with policies related to child safety and investigations of abuse, trafficking, and other crimes against children, the broad parameters of the executive order risk unlimited information sharing that violates children’s rights and prioritizes immigration enforcement against children’s sponsors and family members. Similar policies during the first Trump Administration led to enforcement actions against undocumented sponsors using information obtained from children at the border and in ORR custody. These policies created a broad chilling effect that deterred parents and other family members from coming forward to care for children, prolonging children’s time in ORR care and compounding children’s trauma and distress. Renewal of broad information sharing risks these same harms to children, at significant taxpayer expense, and could exacerbate risks of child exploitation if children are ultimately released to less suitable sponsors because their family members are deterred from sponsorship.



January 20

Barriers for Children Fleeing Recruitment and Exploitation by Gangs and Cartels

In an executive order, the president directs the secretary of state and other federal agencies to recommend cartels and criminal organizations for designation as foreign terrorist organizations. Many unaccompanied children flee to the United States to escape forced recruitment, persecution, trafficking, and exploitation by organized criminal organizations, which frequently target children due to their vulnerability and lack of protection. Under the executive order and other policies, these designations could lead to increased interior enforcement and arrests of people, including unaccompanied children, who are perceived to be members of designated organizations. Children seeking protection from persecution, including children who were threatened with severe harm or death if they did not pay extortion fees or act on behalf of a gang or cartel, could be found inadmissible or ineligible for asylum on grounds of terrorism, and consequently, returned to danger or subject to criminal consequences.



January 20 and 24

Expanded Expedited Removal and Interior Enforcement

An **executive order** and **DHS policy** expand expedited removal—a process through which certain noncitizens apprehended near U.S. borders may be rapidly removed from the United States without full immigration proceedings. The expanded DHS policy, restored from the first Trump Administration, permits DHS to apply expedited removal to noncitizens apprehended anywhere in the United States who have been continuously present for less than two years. Subsequent policies further expand expedited removal to apply at any time. Under federal anti-trafficking law, unaccompanied children are not subject to expedited removal. Nevertheless, the Administration’s focus on interior enforcement risks erroneous placement of unaccompanied children in expedited processes or the use of such measures to strip unaccompanied children of vital legal protections. These actions could lead to the deportation of vulnerable children to the very harm they fled. They also risk trauma and family separation for millions of children in immigrant families who witness or are impacted by enforcement. In September 2025, a federal district court blocks the government’s application of expanded expedited removal to people living in the interior of the United States.



January 21

Restoration of the Remain in Mexico Policy

The Administration **reinstates the Migrant Protection Protocols (MPP)**, formerly known as the **Remain in Mexico Policy**. Under a prior iteration of MPP, first announced in 2019, the United States required thousands of asylum seekers to wait in Mexico for their U.S. immigration proceedings. Human rights organizations documented widespread harm to children and other asylum seekers forced to wait in border towns, including kidnapping, rape, murder, and extortion. Although unaccompanied children were officially exempt from the policy, it nevertheless rendered hundreds of children unaccompanied after their parents were threatened or disappeared. In violation of protections provided in the Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA), many children who subsequently sought protection in the United States as unaccompanied children were ordered removed or deported for failing to appear for their family’s MPP case while the child was in separate proceedings in the United States as an unaccompanied child. The Administration offers no clarity regarding whether unaccompanied children will be exempt from the restored MPP policy—compromising children’s safety.



January 29

Elimination of Specialized Children’s Dockets; Weakening of Child-Sensitive Court Practices

The Executive Office for Immigration Review (EOIR) issues several **memoranda** rescinding and replacing earlier policies that provide for child-appropriate safeguards in immigration court. New policies create barriers to due process by eliminating specialized children’s dockets, established through a **2023 EOIR memorandum**, that are staffed by adjudicators trained in trauma-informed practices and children’s cases. They also weaken access to **pro bono legal representation**, **Friend of the Court** assistance, and **child advocates** representing children’s best interests. These policies, many of which restore measures in effect during the first Trump Administration, undermine fair consideration of children’s cases, including by instructing judges to be skeptical of claims for protection by unaccompanied children.

FEBRUARY 2025



February 3

Additional Barriers in Immigration Court

EOIR **rescinds** several memoranda and reinstates prior policies creating more accelerated timelines for asylum cases and significantly curtailing the ability of immigration judges to grant continuances. Continuances in proceedings are often essential for unaccompanied children to have sufficient time to be able to secure legal counsel and have their cases for asylum and other humanitarian protection first considered by U.S. Citizenship and Immigration Services (USCIS). With limited access to continuances, children may be required to appear alone in court and navigate rushed hearings that inadequately consider their protection cases.



February 14

Extensive Information Sharing Between ORR and DHS

News articles report that ORR has permitted additional ICE personnel to access its Unaccompanied Children's Portal, a database containing a wide array of sensitive and confidential information about children and their potential sponsors. Among other information, the portal includes children's medical and mental health records, documents related to a child's time and experience in care, and other assessments. In recognition of its sensitive nature and to protect children's safety and well-being, this information is subject to various limits on information sharing and access. Expanded access raises significant concern about the potential for use of children's information to advance DHS's immigration enforcement efforts and about the potential blurring of roles between ORR, which is tasked under federal anti-trafficking law with care and placement of unaccompanied children in the "least restrictive setting in their best interests," and DHS's distinct immigration and law enforcement priorities.



February 14

Increased Barriers to Sponsorship

ORR issues **field guidance** directing that all potential sponsors, adult members of their households, and alternative caregivers listed in an unaccompanied child's proposed care plan be fingerprinted and undergo background checks as part of ORR's sponsor suitability assessments. The guidance further requires that all such individuals present original, unexpired documents when attending fingerprint appointments and provide ORR with color copies of original, unexpired documents to confirm their identity. These policies significantly broaden prior requirements, which previously did not require fingerprinting for sponsors who are parents, legal guardians, and other immediate relatives who had previously served as the child's primary caregiver, or for other adult household members and alternate caregivers, with the exception of cases indicating safety concerns or requiring a home study. ORR also previously accepted expired documents to establish identity where unexpired documents were unavailable. The new requirements pose significant delays in the release of children, as potential sponsors and others in the care plan may lack access to unexpired documents if, for example, their foreign passports have expired, or may decline to engage with ORR due to fear of increased enforcement.



February 18

Suspension of Legal Services for Unaccompanied Children

The Administration issues a **"stop work" order** suspending funding and work under a federal legal services contract serving more than 26,000 unaccompanied children. This action blocks dozens of nonprofit organizations funded through subcontracts from providing legal screenings and legal representation to children in and released from ORR custody. The funding pause runs counter to the TVPRA, which directs ORR to ensure "to the greatest extent practicable" that unaccompanied children have attorneys to represent them in legal proceedings and matters and to "protect them from mistreatment, exploitation, and trafficking." It also overlooks congressional funding directives stating that funds provided are to be used to support post-release services, including legal services. Without an attorney, children face insurmountable barriers to due process and legal protection, are at heightened risk of trafficking and exploitation, and may be deported to harm. The interruption of the attorney-client relationship generates fear, uncertainty, and confusion for children as young as infants and toddlers, who may face upcoming proceedings in their protection cases with no one by their side, and who may not comprehend how to appear for and otherwise participate in their court hearings. Attorneys and organizations work to uphold their ethical obligations to thousands of clients, while confronting significant financial hurdles to continuing representation over the long term. After only days, the Administration **rescinds** the "stop work" order.



February 19

Gutting of Oversight and Complaint Mechanisms Serving Children

The Administration cuts most staff at HHS's new Unaccompanied Children Office of the Ombuds, including the office's first Ombudsperson. The office, which was created by a 2024 ORR regulation, aids compliance with the government's legal obligations pertaining to the care and treatment of children, provides a complaint mechanism for children and other stakeholders, and promotes accountability through monitoring and oversight investigations to improve policy and prevent harm. Cuts to the office risk persistent violations of policy and law, and increase risks for children in and released from care.



February 23

Initiative Targeting Enforcement Against Unaccompanied Children and Sponsors

ICE issues a memorandum, subsequently made public through a Freedom of Information Act request, establishing an "operational initiative to locate unaccompanied children" who were encountered by DHS and released from ORR care. The stated purpose of the initiative includes verifying that children are meeting immigration obligations and ensuring children "are not subjected to crimes of human trafficking and other exploitation." ICE utilizes various data sources, including ORR's database of children's sensitive information, to prioritize unaccompanied children in various groups, including children who did not attend immigration court hearings and received removal orders, who ORR could not reach during follow-up calls, who were released to "non-blood" relatives, who are considered a public safety threat, or have "executable" removal orders. The memorandum references "potential federal criminal violations" ICE can consider for sponsors.



February

DHS Conducts At-Home Visits to Unaccompanied Children

Subsequent to issuance of the ICE memorandum on establishing an "operational initiative to locate unaccompanied children," agents from ICE and Homeland Security Investigations (HSI)—and in some cases federal personnel from other agencies such as the Federal Bureau of Investigations (FBI), Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and Drug Enforcement Administration (DEA)—begin conducting "wellness checks" on unaccompanied children throughout the country, typically at children's homes, based on prepared target lists. During checks, agents may be armed and in tactical gear, surround the child's home, and request to speak with the child and their sponsor. Agents typically ask questions about the child's journey to the United States, whether the child is attending school or working, and about a sponsor's relationship to and treatment of the child, and request to view the child's room. Following the check, ICE may file a Notice to Appear (NTA) with the immigration court formally initiating removal proceedings for children and sponsors not yet in proceedings. News reports indicate that at least 100 children are removed from their sponsors and returned to government custody, and some 450 cases are referred for federal criminal enforcement. The checks generate widespread fear and confusion among children and families. Later reporting indicates that nearly 500 children have been returned to ORR custody following "wellness checks," in some cases due to immigration enforcement against their sponsors.

MARCH 2025



March 7

Additional Restrictions on Sponsorship

ORR modifies its sponsorship policies to significantly narrow the kinds of documentation that potential sponsors of unaccompanied children may provide to prove their identity, address, and relationship to the child. These changes, which largely limit documentation to forms most commonly available to people with lawful immigration status, create insurmountable barriers for many parents and other family members applying to care for children in ORR's care. ORR also issues field guidance requiring DNA testing of all potential sponsors claiming a biological relationship with an unaccompanied child. The guidance indicates that sponsors who refuse will be categorized as unrelated and subject to enhanced vetting. The length of stay for children in ORR's care begins to significantly increase, as many potential sponsors, including those who have already completed the required application, are unable to meet these new and shifting requirements, and alternate sponsors may be unavailable. From October 2024 to July 2025, the average length of care for children discharged from ORR custody spikes from 35 to 171 days. The modified sponsor policies are currently the subject of ongoing litigation.



March 12

National Registration Requirement

DHS issues an interim final rule, effective after one month, requiring that all noncitizens not considered already “registered” with the government on the basis of specific legal applications or immigration documents submit a new registration form. In addition to the form, which is available only online, noncitizens will have to comply with related fingerprinting, address update, and proof of registration requirements or face potential civil and criminal penalties, prosecution, detention, or deportation. The rule does not exempt unaccompanied children. Instead, it specifically requires that parents or legal guardians register children who are under 14, and that all children 14 or older register themselves within 30 days of their 14th birthday, even if previously registered by an adult. The requirements include several ambiguities and disregard children’s unique developmental and other needs. They create broad confusion about how requirements are to be completed by unaccompanied children still in the government’s care or released to a sponsor, and who may have limited resources, understanding of immigration law, knowledge of English, or access to counsel. The Administration’s recent termination of legal services for unaccompanied children increases the likelihood that children may have no one to assist them in navigating these consequential requirements.



March 14

Deportations of “Alien Enemies” without Due Process

The Administration issues a proclamation declaring an “invasion” by Tren de Aragua, a Venezuelan group designated by the Administration as a foreign terrorist organization. The order invokes the Alien Enemies Act and directs the immediate apprehension, detention, and removal of “all Venezuelan citizens 14 years of age or older who are members of [Tren de Aragua]” as “alien enemies.” Apprehensions and removals of hundreds of people swiftly follow, without due process or an opportunity to be heard. The Administration unlawfully deports many people to the Terrorism Confinement Center (CECOT) in El Salvador, in several cases on the basis of mistaken identity, little to no evidence, or the government’s erroneous interpretation of tattoos as indicative of gang affiliation. The executive order includes no exception for unaccompanied children, many of whom fled persecution or efforts by gangs and other criminal organizations to recruit or exploit them, and for whom federal law prescribes specific procedural protections. Litigation reaches the Supreme Court, which halts removals until further orders. In at least one case, an asylum seeker who entered the country as an unaccompanied child is unlawfully deported, in violation of a legal settlement prohibiting removal of certain people previously determined to be unaccompanied children while their asylum applications remain pending. A federal court orders the return of the young asylum seeker. In September 2025, a federal appeals court rules that the federal government’s invocation of the Alien Enemies Act is unlawful and rejects the government’s assertion that mass immigration constitutes an “invasion” under the Act.



March 21

Termination of Legal Services for Unaccompanied Children

After previously halting work under a federal legal services contract serving unaccompanied children, the Administration in late March partially terminates the underlying contract. This action upends legal representation for tens of thousands of children, potentially leaving them without critical support and assistance as they navigate complex and intimidating immigration processes. The government’s order lacks detail and creates significant confusion among providers about which services are terminated even as children’s hearings and proceedings proceed. Organizations take steps to bridge the funding gap while sustaining legal representation but face growing challenges, including the need to divert funds from other services, undertake potential layoffs or closures, or consider withdrawal from or transfer of representation on cases. Several organizations file a lawsuit challenging the funding termination. The government re-negotiates and restores funding and services for a limited period, through September 2025, following court orders in the litigation. In July 2025, the federal government renews the contract through the end of October 2025, with the option to reevaluate in three-month increments through July 2026. The future of this critical funding--and of legal representation of over 26,000 unaccompanied children nationwide--remains uncertain.



March 21

Limitation of Critical Services and Support

ORR publishes a notice reducing the future eligibility period for Refugee Cash Assistance and Refugee Medical Assistance from 12 months to four months. This change reduces critical services that support vulnerable populations in meeting basic needs and receiving care to support their healing and safety. Among those who may be affected are children granted asylum, children in ORR’s Unaccompanied Refugee Minors program, and children who have experienced potential trafficking and exploitation and who may be eligible for “T” visas and applying for interim assistance.



March 21

Layoffs, Closures at DHS Oversight Offices

The Administration abruptly closes and conducts mass firings and layoffs at critical DHS offices that are charged with conducting oversight and investigations to uphold civil rights and respond to complaints and concerns from impacted individuals and the public. Affected offices include the DHS Office of Civil Rights and Civil Liberties, the USCIS Office of the Ombudsman, and the DHS Office of the Immigration Detention Ombudsman. The offices serve as critical mechanisms for elevating concerns and responding to violations of people’s rights in immigration custody and have played an important role in highlighting practices that harm unaccompanied children, including through investigations of conditions in CBP custody and ICE custody, family separation, and immigration enforcement against children and families. DHS partially restores the offices amid litigation challenging the closures, although the offices’ capacity to carry out oversight remains substantially impaired by earlier staffing cuts.



March 25

Formalizing DHS-ORR Information Sharing for Immigration Enforcement

ORR publishes an interim final rule eliminating restrictions on its collection and sharing of immigration status information about potential sponsors for unaccompanied children. The rule, which takes effect immediately on publication and without any prior consideration of public comment, also eliminates regulatory language clarifying that ORR does not disqualify potential sponsors based solely on their immigration status. Coupled with earlier policy changes, the rule marks a dramatic shift in ORR policies and threatens to deter sponsorship of unaccompanied children, compels many children to remain in federal government care indefinitely, and significantly increases government costs. In addition to compounding the trauma of children who fled harm, the rule also risks targeted enforcement against children’s family members and other caregivers. The rule and policy changes frustrate implementation of ORR’s own regulations as well as specific legal protections in the TVPRA and other safeguards designed to ensure children’s safety and well-being and to prevent trafficking. The rule and policy changes are currently the subject of ongoing litigation.

APRIL 2025



April 11

Curtailed Procedural Safeguards in Immigration Court

EOIR issues a policy memorandum urging immigration judges to manage their dockets by denying applications for asylum where appropriate without first providing a hearing. The new policy threatens to increase summary denials of asylum applications for minor deficiencies without providing an opportunity for the applicant to correct them and risks rejection of cases with dire protection needs. Additional memoranda rescind and replace earlier guidance and urge limitations on the use of administrative closure, a docket management tool provided for by regulations whereby judges may temporarily remove cases from their dockets, and of changes in venue that transfer a case to another immigration court. Like continuances, administrative closure is an important tool that helps ensure efficiency and fairness in unaccompanied children’s court cases by enabling sufficient time for children to find an attorney and have their humanitarian protections claims considered by USCIS, which has initial jurisdiction over these claims. Change of venue motions also are often critical to ensure that a child’s immigration removal proceedings, if initiated by the government while the child is still in ORR custody, can be transferred to the court where the child ultimately is released to a sponsor, which may be a different state hundreds of miles away. The new policies entrench additional due process hurdles for children in an already complex immigration system and threaten expedited proceedings without meaningful consideration of children’s protection needs. In July, ICE begins an effort to seek re-calendarings of court cases that judges had administratively closed.



April

Deportations of Parents

In several **reported** cases, mothers are subjected to ICE enforcement and are rapidly deported without due process with their U.S. citizen children. In some cases, mothers are not afforded an opportunity to make decisions about or arrange for alternate caregivers for the child in the United States, speak with the child's other parent or family members, or consult an attorney. In one such case, a 4-year-old U.S. citizen child receiving treatment for stage 4 cancer was deported without medications or contact with their doctor. These practices undermine the constitutional rights of parents and children alike and are at odds with ICE's own Parental Interests Directive, which is intended to support parents' ability to make decisions about their children's care. Consequently, many families are separated, with little ability to learn of their loved ones' whereabouts or to ensure their safety.



April

Cancellation of Legal Services for Separated Families

The Administration **terminates** a federal contract supporting legal services for separated families covered by the legal settlement in *Ms. L v. ICE*, a case that halted the prior Trump Administration's Zero Tolerance Policy. Pursuant to the settlement, the federal government must provide legal assistance, including "legal access and orientation" specific to Ms. L class members and must facilitate pro bono legal representation. These services are critical for impacted families, who experienced grave trauma and who continue to face particularly complex legal cases. The interruption of these services amid rapid changes in immigration policies and increasing immigration enforcement compounds the vulnerability of reunifying families and risks re-separation and re-traumatization. In response to a motion to enforce the settlement in court, the federal government references plans to provide the legal services directed under the settlement itself, rather than contracting with nonprofit providers. EOIR subsequently circulates a flyer to providers inquiring about their interest in taking on cases on a volunteer basis. The proposed arrangement departs from the settlement's terms and poses myriad conflicts of interest, as the government would be administering legal advice in cases that it would then adjudicate. Through orders issued in June and July 2025, a **federal court** finds the federal government in breach of the settlement and requires the government to reinstate the contract for legal services for separated families.



April

New Sponsor Income Requirements

ORR further narrows eligibility for unaccompanied children's sponsors by imposing **new requirements** that sponsors provide proof of income, including through the presentation of U.S. tax filings, pay stubs from the last 60 days, or a letter from their employer verifying their salary and employment. Many sponsors may lack work authorization, including if they are still applying for legal protection in the United States, or may be unable to provide these documents. The stated forms of proof omit other potential means of demonstrating financial ability to care for a child, such as bank or other financial statements. The new requirements increase barriers to children's release and further deter sponsorship of unaccompanied children as they experience long stays in ORR custody.

MAY 2025



May 22

Attempts to Terminate the Flores Settlement

DOJ **files a motion** in federal court to terminate the *Flores* Settlement Agreement, which sets national standards for care, treatment, and release of children in federal immigration custody. The settlement incorporates basic child welfare safeguards into the immigration system. Past administrations have moved unsuccessfully in court to terminate or modify it or created regulations intended to terminate the agreement. Federal courts have previously found that *Flores* regulations promulgated by DHS during the first Trump Administration did not implement the settlement and that related HHS regulations were largely consistent with

the settlement, with several exceptions. In 2024, ORR promulgated a new regulation intended to implement the *Flores* settlement and the TVPRA as pertains to HHS. A federal court partially terminated the *Flores* settlement as it applies to ORR/HHS in 2024 on the basis of this regulation, while finding some provisions of that rule still insufficient. The federal government's recent motion reasserts several previously litigated arguments and asserts that the settlement limits the government's authority over national immigration policy, is no longer necessary due to changed circumstances, and that the court lacks jurisdiction to enforce the agreement. The motion follows the government's stated efforts to increase immigration enforcement and detention capacity nationally. Children in ORR custody continue to experience prolonged lengths of stay following ORR's recent policy changes to the sponsor process and DHS's immigration enforcement against sponsors. Violations of the settlement remain persistent, as evidenced by a recent court ruling regarding unsafe and unsanitary conditions in border facilities where children and families are held. In August 2025, a federal court denies the government's motion to terminate the *Flores* settlement. In October 2025, the Administration appeals the ruling. Litigation remains ongoing.

May



Mounting ICE Arrests at Courthouses

Reports of ICE arrests at immigration courts surface throughout the country. In many instances, a DHS attorney requests to dismiss an individual's case during the scheduled court hearing, and if granted by the judge, ICE officers present in the courthouse then arrest the person and process them for expedited removal. In some cases, ICE arrests people who judges have scheduled for future proceedings. The arrests upend due process and risk the deportation and detention of thousands of people, including children and others who have fled harm and who are seeking asylum or other humanitarian protection. The sudden nature of enforcement compels the separation of families, in many cases without the ability for family members to communicate, learn of each other's location, or make alternative care arrangements for children. The arrests, and risk of potential detention or return to harm, generate widespread fear throughout immigrant communities. Although exempt from expedited removal by law, unaccompanied children nevertheless confront risk of arrest, detention, and removal, as DHS considers stripping children of their unaccompanied status once they turn 18 or reunify with a parent or legal guardian to make them amenable to expedited removal. These circumstances compound the trauma and fear of unaccompanied children, many of whom do not have a family member to accompany them to court due to fear of enforcement, or an attorney to assist them.

JUNE 2025



June 6

Rescission of SIJS Deferred Action Policy

USCIS halts its policy of automatically considering for deferred action children and youth who have been granted Special Immigrant Juvenile Status (SIJS) by USCIS but who have been unable to adjust to lawful permanent resident status due to visa backlogs. This rescission, which was formally announced in a June 2025 policy alert, means that as many as 200,000 children and youth who state juvenile courts have found to have experienced abuse, abandonment, neglect, or other similar mistreatment and to whom USCIS has granted SIJS protection will face renewed risk of deportation. The rescission also prevents SIJS youth from applying for or renewing work authorization based on deferred action. Consequently, thousands of children may lose access to a vital form of U.S. government-issued identification that is often required to access basic services and that assists eligible youth in securing safe and lawful employment that can mitigate their vulnerability to trafficking and exploitation. In several cases, immigration judges order the removal of children who have pending SIJS applications, or who were granted SIJS and deferred action as they await visas. USCIS first created the SIJS deferred action policy in March 2022 to address longstanding visa backlogs that frustrated access to permanent protection for children as Congress intended through the TVPRA. The rescission of the SIJS deferred action policy is currently the subject of litigation.

In November 2025, a federal court orders a stay of the government’s rescission of the 2022 SIJS deferred action policy. Pursuant to the court’s order the government must adjudicate SIJS deferred action and EADs pursuant to the 2022 Policy Alert.

In January 2026, the court declines Plaintiffs’ request to confirm that the court’s November 2025 order restored USCIS Policy Manual guidance from April 2025 on SIJS deferred action, instead holding that USCIS must treat SIJS approval as a “particularly strong factor that weighs heavily in favor of granting deferred action” only where the SIJS petition was approved before June 6, 2025, but otherwise need not apply any Policy Manual provisions broader in scope than USCIS’s March 2022 Policy Alert.

JULY 2025



July 14

Rescission and Weakening of ICE Guidance on Parental Rights and Interests

ICE rescinds and replaces its 2022 Parental Interests Directive, a policy designed to support family unity and protect the rights of parents in ICE detention or subject to immigration enforcement. Among other changes, the new guidance does not require ICE to place a detained parent or legal guardian near their child or close to pending family, child welfare, or guardianship proceedings. It also weakens safeguards requiring ICE to provide parents a reasonable opportunity to make arrangements for their child before deportation and consult with counsel, and a means by which to communicate with consulates, family members, courts, and others to execute necessary documents—instead conditioning these on operational feasibility and practicability. The guidance also eliminates provisions directing ICE to assist a parent’s temporary re-entry into the United States to participate in parental rights proceedings. As immigration enforcement ramps up nationally, the weakened guidance risks increased separations of children and families, breaches parents’ rights, and threatens deportations of parents and legal guardians without regard for children’s safe care.



July 22

Imposition of New Fees on Immigration Applications

USCIS issues a notice directing new and increased fees for immigration applications and benefits, in an effort to implement provisions of H.R. 1, the “One Big Beautiful Bill Act (OBBBA)”, which was signed into law in early July. The new policy requires significant fees for applications for humanitarian protection that were previously without cost and bars fee waivers for some fees, including for children. Among the new costs are a \$250 fee to apply for SIJS, a \$100 fee to apply for asylum, \$100 annually for pending asylum applications, and a \$550 fee for asylum applicants applying for initial work authorization. EOIR issues a memorandum similarly imposing the new fees for certain applications and motions before immigration courts. The fees pose intractable barriers to protection for many unaccompanied children applying for asylum, SIJS, or other legal relief. Having fled threats to their lives and well-being and relying upon adults to meet their basic needs, many unaccompanied children lack financial resources or work authorization to pay these sums and may lack legal counsel to assist with their applications. The new fees increase the risk that children will become vulnerable to exploitation and trafficking and threaten the return of children to harm.



July 23

Efforts to Summarily Remove Unaccompanied Children

News outlets report on a new policy directing CBP personnel to ask unaccompanied children if they would like to “voluntarily” depart the United States; CBP would provide for the transfer of children who agree to ICE for deportation. The new policy risks summarily returning unaccompanied children with dire protection needs to their countries of origin or Mexico, without full protection screenings or due process safeguards specifically provided for by the TVPRA to prevent trafficking and other harms. Although principally directed at CBP and purporting to implement new border-related provisions of OBBBA, the new policy appears to extend to potential DHS encounters anywhere in the United States and exposes tens of thousands of children to rapid removal without full consideration of their protection needs or legal cases, contrary to the TVPRA and children’s best interests.



July

Law Enforcement Interviews of Potential Sponsors

ORR implements a new policy requiring potential sponsors of unaccompanied children to appear in-person for an interview before an unaccompanied child may be released to their care. A [media article](#) cites guidance indicating that federal law enforcement agencies may be present during the interviews and participate for their purposes. Scant detail is provided regarding the potential content or scope of the interviews. The new policy, implemented alongside other changes permitting broad information sharing for immigration enforcement purposes and imposing new sponsorship requirements, prevents children's reunification with parents, legal guardians, and other family members, and contributes to dramatic increases in time in ORR care. By prioritizing immigration enforcement against parents and other sponsors, these policies impose significant costs, divert ORR from its child welfare mission, deter safe and suitable parents and other family members from coming forward to care for children, cause trauma to children, and increase the likelihood that children will be detained indefinitely or released to unfamiliar or less suitable sponsors--at increased risk of trafficking and exploitation.

AUGUST 2025



August 8

Law Enforcement Interviews of Children in ORR Care

Media [reports](#) indicate that federal law enforcement agents will begin interviewing unaccompanied children in ORR care, with the purported aim of identifying criminal activities that threaten unaccompanied children. Anecdotal reports describe widespread fear, confusion, and trauma among children in relation to the interviews, some of which are described as adversarial in tone and as encompassing questions about a child's journey to safety and other sensitive topics. The new process, which lacks trauma-informed safeguards, risks widespread re-traumatization of children and inappropriately blurs the lines between ORR's traditional child welfare role and DHS's immigration and law enforcement functions.



August 31

Attempted Forced Returns of Guatemalan Unaccompanied Children

DHS, in coordination with ORR, attempts to unlawfully remove hundreds of Guatemalan unaccompanied children who are in ORR care through middle-of-the-night flights to Guatemala during a holiday weekend. Children are awoken to board removal flights, in many instances with no understanding of what is happening, notwithstanding their pending cases for U.S. protection, and with scant or no notice to attorneys, care providers, and child advocates. The attempted forced returns without due process create confusion and [deep fear](#) for children, and raise grave concerns that children, many of whom are indigenous and have fled persecution, violence, discrimination, and abuse, may be returned to harm, contrary to the U.S. Constitution, U.S. and international law, and specific protections provided by the TVPRA.

Several lawsuits challenge the removals and request that courts halt the returns. In emergency court hearings and related [news reports](#), the federal government asserts that the attempted forced returns are "repatriations" or "reunifications" at the request of the Guatemalan government and parents. However, declarations in a class-action [lawsuit](#) indicate that many Guatemalan children do not consent to or request return, have significant protection needs, and desire to continue their cases for U.S. protection. Following an emergency hearing, a federal court bars the U.S. government from removing any Guatemalan children in ORR care without final orders of removal for 14 days while litigation continues. [Reports](#) soon after surface of imminent plans to remove unaccompanied Honduran children and other children in ORR care, and plaintiffs seek to add these children to ongoing litigation. In early September 2025, the federal court issues a [preliminary injunction](#) blocking the federal government's removal of unaccompanied Guatemalan children in the government's custody without a final order of removal or permission to voluntarily depart while the litigation is pending. In its decision, the court indicates that the government's actions to remove these unaccompanied children or others without the TVPRA's protections are likely unlawful.

SEPTEMBER 2025



September 2

Narrowing of Asylum Protection

In multiple decisions, the attorney general overrules prior rulings and significantly narrows access to asylum for victims of violence by nongovernment actors or people who are targeted on the basis of their family relationships, including people fleeing domestic violence and abuse, and gang violence. In one decision, reinstated standards create a strong presumption against asylum claims based on a government's failure to control private conduct and largely limit findings of persecution to cases in which the government condones the activities of private actors or demonstrates complete helplessness to afford protection. In another decision, the attorney general finds that kinship ties alone are insufficient to establish "membership in a particular social group" as a ground for asylum. Instead, family-based groups must be sufficiently particular and socially distinct in society to give rise to asylum eligibility. These rulings erect additional barriers to protection for unaccompanied children, many of whom are persecuted by gangs and other criminal actors through forced recruitment, extortion, and targeted violence, or who are fleeing violence and abuse in the home or personal relationships from which their countries of origin are unwilling or unable to protect them.



September 5

Efforts to Hire and Use Armed USCIS Agents

In early September 2025, DHS publishes a final rule delegating new law enforcement authorities to the USCIS director and certain USCIS personnel. The rule, which is published without prior notice and public comment, permits designated USCIS personnel to carry firearms, investigate alleged civil and criminal immigration violations, issue and carry out search and arrest warrants, detain and remove people, and make referrals for prosecution. Under the rule, designated officers may also use deadly force and conduct vehicular pursuits in certain circumstances. The rule represents a dramatic departure from the Homeland Security Act of 2002, which divides responsibility for immigration enforcement and the adjudication of immigration benefits among distinct DHS subagencies and prohibits these entities from re-combining their functions.

Under the TVPRA, USCIS maintains initial jurisdiction over unaccompanied children's asylum claims to help ensure that children's cases are considered in a less adversarial and more child-appropriate setting. Under the rule, however, USCIS officers adjudicating these and other protection applications or who are present in USCIS offices could be armed and tasked with detaining or arresting people appearing before them. The blurring of USCIS's roles with those of CBP and ICE undermines the TVPRA's child-sensitive approach and threatens to exacerbate the trauma of children who have fled harm and impede fair consideration of their protection cases. Consequently, children may be returned to harm or exposed to harsh enforcement.



September

Charging Youth Significant Fees and Civil Penalties to Request Protection

In late September, CBP begins issuing unaccompanied children 14 and older notices assessing fees of \$5,000—the so-called "inadmissible alien apprehension fee," 8 U.S.C. § 1815, passed into law in July 2025 as part of the OBBBA. Notices instruct children that full payment is due immediately and must be received within 30 days to avoid late penalties, and that failure to promptly pay may lead to additional actions by DHS, including referral of the debt for collection; reporting of the debt to national credit bureaus; and taking the debt into consideration in future immigration-related proceedings. The notices evoke deep fear and confusion among unaccompanied children, many of whom arrived at U.S. borders to request protection from harm, abuse, or persecution in their country of origin; are living in ORR shelters or with sponsors; lack ability or legal authorization to work; and do not have parents or other caregivers to support them. Notices advise children that they may dispute the fee within 30 days; however, children may not yet have attorneys, be unable to understand the notices, or receive the documents with little to no time remaining to respond.

Some children jointly receive a notice levying an additional \$250 civil penalty under the Immigration and Nationality Act—a fee that in recent decades seldom has been levied on unaccompanied children.

By imposing significant financial requirements and likely debt on children, the fees deepen children’s vulnerability and heighten risk of trafficking and exploitation—running contrary to foundational antitrafficking safeguards in the TVPRA. The fees also act as a penalty and significant burden on children and others’ rights under U.S. and international law to request asylum and other humanitarian protection.

OCTOBER 2025



October 1

Detaining Unaccompanied Children in Adult ICE Detention

In early October, legal counsel for a class of unaccompanied children move in federal court to block ICE from violating a 2021 nationwide permanent injunction in *Garcia Ramirez v. ICE* that bars ICE from transferring unaccompanied children who turn 18 to adult ICE facilities without considering less restrictive settings for them, as required by the TVPRA. The federal court quickly grants a temporary restraining order against detaining children contrary to the permanent injunction. The motion by children’s counsel describes several instances in which ICE recently detained unaccompanied children who had turned 18, as well as potential plans by ICE to expand detentions through a new policy. The court’s order blocks the government from implementing the new directive, orders the government to produce the directive and relevant records to the court, and orders the rescission of any detention determinations made pursuant to the new directive. In December 2025, the court issues a subsequent ruling enforcing the permanent injunction, blocking ICE’s new guidance, and ordering DHS to release children who were rearrested or detained pursuant to it.



October

Offering Payments to Children Who Drop Protection Claims

In early October, ORR notifies legal services providers for unaccompanied children about a new DHS initiative providing “a one-time resettlement support stipend of \$2,500” to unaccompanied children in ORR custody who are 14 years of age or older and who elect to voluntarily depart the United States. The new effort, reportedly applicable only to unaccompanied children from noncontiguous countries, departs from longstanding legal safeguards for unaccompanied children as well as ORR and ICE practice, and raises widespread concern that children may be coerced to abandon their claims for protection and confront return to harm.



October

Further Narrowing of Refugee Programs

The Administration considers new preferences for refugee status, including English speakers and people from European countries. The policy reportedly aims to increase resettlement of people who have spoken out against mass migration or in support of “populist” political parties, among other policies. The policy further contracts pathways to protection for unaccompanied children and millions of others facing harm and persecution in their countries.



October 30

Ending Automatic Extension of Work Authorization for Renewals Impacted by Backlogs

DHS publishes an interim final rule ending its policy of automatically extending work authorization and employment authorization documents (EADs) for renewal applicants to prevent lapses in employment and other hardships resulting from DHS adjudication backlogs. The new policy, which applies to renewal applications filed on or after October 30, 2025, represents a significant shift from agency regulations in the prior decade that provided for automatic extension periods of 180 days, and most recently 540 days, in recognition of growing delays that might otherwise create harmful disruptions for renewal applicants and employers alike. The change exposes thousands of people, including unaccompanied children applying for asylum and other protection, to future termination of their EADs and employment, if their renewal applications are not promptly adjudicated. It also risks depriving unaccompanied children of a vital, and often their only, form of government-issued identification, which is often necessary to access critical medical and social services.

NOVEMBER 2025



November 3

Expanded Biometrics Collection and Continuous Vetting Impacting Children

DHS publishes a proposed rule that would permit expansive collection of biometrics (including DNA, fingerprints, retinal images, and voice prints) from noncitizens and others “without regard to age.” The proposal, which is similar to a rule first proposed in 2020, represents a sweeping shift from policy and immigration law provisions that generally limit biometrics collection to those 14 years of age and older. In the notice, DHS asserts that “identity management” and “continuous vetting” across the immigration life cycle are necessary to advance national security, combat child trafficking, and aid the adjudication of immigration benefits. To the contrary, the proposal risks cascading violations of civil and privacy rights and other harms, including for citizens, by allowing DHS broad discretion to collect, share, and use sensitive data.

It raises particularly serious concerns for children, largely overlooking research indicating the unreliability of biometrics collected from young children, the limits in obtaining informed consent, and the potential harms of exposing children to privacy and confidentiality risks over decades. The proposed rule also imperils the safety of unaccompanied children and other asylum seekers by allowing DHS to share information with other countries from which they may have fled harm and by risking the rejection of applications for protection for failure to comply with continual biometrics requests, including while detained in government custody.



November 6

Leveraging State and Local Law Enforcement in Immigration Enforcement Against Children

News media report on a new DHS request for information indicating an “immediate need” to create a national call center, located near Nashville, Tennessee, with capacity to receive thousands of calls daily from partners operating under 287(g) agreements, which provide for state and local government collaboration with ICE in immigration enforcement. The proposal describes various “cells,” including one focused on providing partners and field offices with “UAC targeting and focus material” and liaising with ICE’s Juvenile and Family Management Division, and another that would provide “targeting and focus material” to reduce the size of non-detained immigration dockets. DHS subsequently announces a new “UAC Safety Verification Initiative” with 287(g) law enforcement partners, with a stated focus of conducting welfare checks on unaccompanied children. DHS reports that the initiative began in early November in Florida and will be rolled out across the country.

While often presented as an effort to protect children, immigration enforcement efforts targeting children in reality only deepen children’s vulnerability. By leveraging state and local law enforcement in these efforts, these new initiatives create confusion about the distinct roles of child welfare and immigration enforcement authorities and deepen distrust among child survivors of trauma about where they can turn for help. Enforcement agencies may lack familiarity with specific legal protections for unaccompanied children, trauma-informed practices, and the unique vulnerabilities children face. Consequently, these actions could lead to pervasive violations of the TVPRA and other legal rights while risking widespread family separations and traumatization, due process violations, and the potential removal of children to harm. Unaccompanied children throughout the country could face disparate procedures and be transferred among numerous agencies or placements, with little to no oversight or coordination rooted in their best interests and safety.



November 12

Attempts to Terminate Safeguards Against Coerced Removal of Children

The federal government moves in court to terminate the *Perez-Fuñez v. DHS* permanent injunction, which was entered in 1985 to prevent the government from coercing immigrant and refugee children in federal immigration custody to take “voluntary departure” from the United States. The injunction sets out procedural safeguards that DHS must ensure before a child may be returned, including providing children with a notice and advisal of legal rights, a list of free legal service providers, and an opportunity to communicate with a parent, close adult, or attorney/legal services organization. For children from all countries other than Mexico and Canada, the government must ensure that such communication has in fact taken place.

The government’s move to dissolve these critical protections comes on the heels of its efforts to forcibly remove unaccompanied Guatemalan children in September 2025—an effort that remains the subject of federal litigation. It also comes as attorneys in *Garcia Ramirez v. ICE*, a case upholding limits on transfer of unaccompanied children to adult ICE detention when they turn 18, notify a federal court about a new “UAC processing pathway advisal” provided by the government to children arriving to the U.S.-Mexico border. The new “advisal” threatens various consequences, including prolonged detention as well as the potential arrest, removal, or prosecution of a child’s sponsor, if the child seeks a hearing before an immigration judge or indicates a fear of returning to their country of origin. Any erosion of the *Perez-Fuñez* injunction’s vital safeguards, particularly amid these ongoing threats, creates serious risks that children could be returned to harm or face other harsh consequences, despite their desperate need for humanitarian protection.



November 14

Hindering Procedural and Substantive Protections for Abused and Abandoned Children

The Board of Immigration Appeals (BIA) issues a decision, in *Matter of Cahuec Tzalam*, that could narrow access to administrative closure—a temporary pause in immigration court proceedings—for children applying Special Immigrant Juvenile Status before USCIS. In the case, the BIA found that the young person’s submission of a USCIS receipt notice for their SIJS petition was insufficient to establish “prima facie eligibility” for SIJS, as it was not accompanied by the underlying order from the state juvenile court. The court further found that legal relief was not likely in a “reasonably short period of time” due to the wait for an available SIJ visa.

This decision increases procedural barriers for children who have been abused, abandoned, or neglected, who could now be required to proceed with immigration court hearings that could lead to a removal order, notwithstanding their having applied for or received humanitarian protection before USCIS or a state juvenile court’s having found that it is not in the child’s best interests to return to their country of origin.

The BIA issued several additional decisions that could limit access to forms of relief and narrow discretion in ways that only heighten barriers for unaccompanied children.



November 19

Proposed Expansion of the Public Charge Rule

DHS proposes to rescind the 2022 “public charge” rule, which provided clarity regarding how the government determines whether a noncitizen is likely to become primarily dependent on government support when it evaluates whether certain individuals are eligible to be admitted to the United States or to obtain a green card. The proposal lacks corresponding regulations in replacement and suggests only that future policy guidance may be forthcoming. It further departs from longstanding policy by suggesting that when evaluating certain individuals’ applications, DHS may consider the use of public benefits by a family member who is not seeking to adjust their immigration status. The proposal also aims to subject people who used public benefits while exempt from the rule to future public charge determinations, if they later apply to adjust their immigration status under a different, non-exempt category.

These changes threaten to dramatically chill access to a vast range of vital services and public benefits. Amid mounting fear of the rule and intensifying immigration enforcement nationally, children, their sponsors, and other family members—who may have varying immigration statuses—may forgo critical medical care and social services that support children’s well-being, healing, and ability to apply for legal protection. This includes unaccompanied children and others who may be applying for or who were granted forms of humanitarian relief, including asylum and SIJS, and for which public charge determinations do not apply or may be waived. By undermining the stability of families and increasing children’s vulnerability, the proposed rule only heightens risk of trafficking, exploitation, and harm to children.



November 29

Re-Reviews of Refugees and Other Protection Seekers; Halt on Asylum Protections

Following the shooting of two National Guard members in Washington, DC, by an Afghan national, the Administration swiftly introduces a series of restrictive immigration policies: banning travel from 19 countries, halting decisions on pending asylum applications, suspending consideration of applications and visas for Afghan nationals, and ordering re-review of immigration benefits for individuals from “high risk countries of concern” and others approved during the Biden Administration.

Accompanied by harsh rhetoric from the Administration, these changes stoke widespread fear and uncertainty and leave thousands of people, including unaccompanied children, unable to access necessary humanitarian protection and potentially in harm’s way. Travel bans, which the Administration later expands to include 39 countries, also threaten to separate families indefinitely and create new barriers to reunifying in the United States. The new policies mean that unaccompanied children who have navigated a challenging immigration process and asylum interview may have to wait indefinitely to learn whether they will be granted the right to remain in the United States, only compounding prior trauma. Children previously granted asylum and other relief face similar fears--uncertain whether protections that afforded them safety from harm could be abruptly upended.



November

Blocked Releases of Children from ORR

Throughout November 2025, releases of unaccompanied children in ORR custody to sponsors slow to a near halt, including in cases presenting no child welfare concerns. Subsequent news articles cite anonymous ORR officials, who describe verbal orders from ORR leadership instructing staff to halt releases to sponsors until further notice. Length of stay for children in ORR continues to rise, with children indefinitely separated from parents and other safe caregivers who are available and applying to care for them. News reports indicate that while just over 100 children were released to sponsors in October 2025, only four in total are released to sponsors in the month and a half that followed. Children grow increasingly distressed as time in custody mounts with uncertain options for release. These circumstances only compound earlier trauma and increase the likelihood that children who face serious protection risks in their country of origin nevertheless may request voluntary departure due to detention fatigue and hopelessness.

DECEMBER 2025



December 4

Reducing the Duration of EADs and Work Authorization

USCIS **announces** an update to its **Policy Manual** reducing from 5 years to 18 months the maximum validity period for work authorization and EADs in certain categories (including for asylees, refugees, and people with pending asylum or adjustment of status applications). Applicable to pending EAD applications and those filed after December 5, 2025, the policy change means that unaccompanied children and others will be required to renew their work authorization more frequently and could face significant adjudication delays due to existing backlogs. As a result, eligible youth could face challenges in securing or maintaining safe, lawful employment that may contribute to their financial security and goals and mitigate risk of exploitation. It also could disrupt children’s access to EADs that often serve as the only form of government-issued identification with which to access necessary benefits and services.



December 5

Hindering Biometrics Compliance for Detained Children and Others

USCIS **announces** an update to its **Policy Manual** stating that it will no longer facilitate collection of biometrics from individuals in government custody, including DHS and non-DHS facilities, and that it has no obligation to do so for people not in removal proceedings or who do not have applications pending before EOIR. This means that USCIS will no longer send USCIS contractors to detention facilities to collect biometrics from detained individuals who only have an application pending before USCIS—a shift that creates further hurdles for unaccompanied children and others in detention who may receive biometrics requests from the federal government but be unable to independently travel to Application Support Centers to provide them. The Policy Manual further provides that USCIS will not facilitate biometrics requests from unaccompanied children in removal proceedings who have pending asylum applications, as USCIS rather than EOIR has initial jurisdiction over these. USCIS also will not reschedule biometrics appointments on account of one’s detained status.

Owing to these policy changes and departure from past practice, unaccompanied children in ORR or DHS custody could face difficulty in complying with biometrics requirements made by DHS or essential for the humanitarian protection applications, due to no fault of their own, and consequently find their applications for relief rejected as abandoned if they miss scheduled biometrics appointments. DHS’s recent proposal of a regulation expanding the agency’s authority to request biometrics, including from children under 14, and providing for “continuous vetting” until citizenship only heighten these barriers to protection for children in need.

JANUARY 2026



January 6

Further Restrictions on Sponsor Releases

ORR publishes several updates to its **Policy Guide** that provide the agency greater discretion to delay or deny a child’s release from ORR custody if their potential sponsor is “under investigation” for certain crimes. The changes, which follow a series of shifting and restrictive requirements implemented in the preceding months, create additional barriers for children’s reunification and could block releases even in cases in which there are no child welfare concerns. Coupled with extensive information sharing among agencies and recent DHS initiatives targeting unaccompanied children and sponsors (as detailed in a **memorandum** made public via FOIA outlining potential criminal violations that may be lodged against sponsors) the new policy raises concerns that it could be used broadly in ways that prolong children’s detention, criminalize caregivers, and upend children’s access to protection.



January

Impacts on Children of Escalating Immigration Enforcement

Increasingly harsh tactics by ICE and CBP, including a series of shootings; deployment of tear gas against children; detention of a 5-year-old child; arrest of a family seeking medical care for a child at a hospital; and enforcement in schools and other sensitive locations, generate widespread fear, harm, and trauma for children, families, and communities targeted by and witnessing such actions. Many children and families now fear that leaving their homes or going about daily activities could expose them or their loved ones and friends to enforcement or even violence. Schools are seeing decreased enrollment, lower attendance, and in some instances, system-wide closings as a result. These actions endanger children's safety, rights, and wellbeing, exacerbate the trauma of child survivors of violence and abuse, and compound barriers to accessing necessary protection.