

ICE's New Young Adult Case Management Program: Why It Falls Short of Case Management Best Practices and Puts Youth at Risk



In January 2023, US Immigration and Customs Enforcement (ICE) began rollout of the Young Adult Case Management Program (YACMP), a new program that targets 18- and 19-year-old immigrant youth that ICE deems “non-dangerous” and “low flight risk.” Although ICE characterizes this program as an “Alternative to Detention (ATD),” the program’s design makes clear that it will not decrease reliance on detention, but instead increase the number of young people under government monitoring.

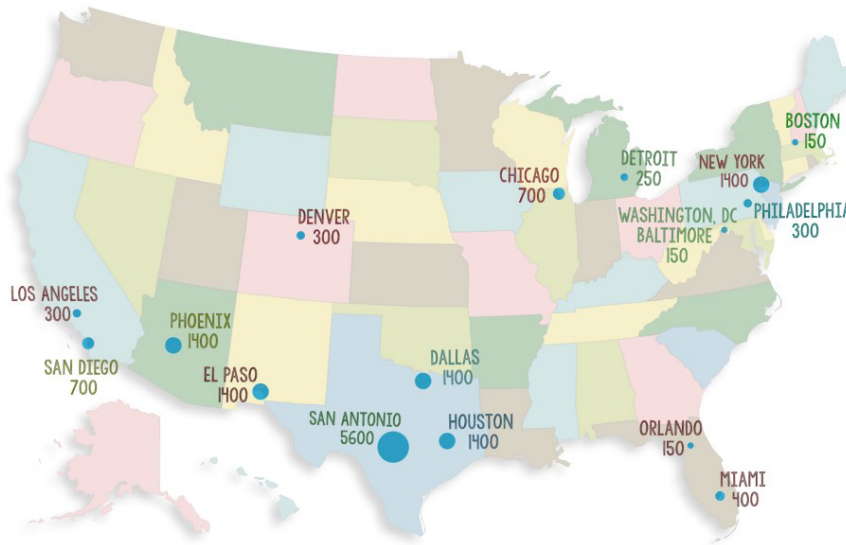
In contrast with [typical case management programs](#) that work collaboratively with youth to match them with support services based on individual needs, ICE unilaterally and arbitrarily enrolls young adults in YACMP if they are facing immigration court proceedings and are not detained, irrespective of their specific needs. Further, ICE [awarded nearly \\$20 million to Acuity International](#), a corporation with no experience in case management and a rebranded offshoot of the [troubled federal contractor Caliburn](#), to run YACMP for 18- and 19-year-olds facing immigration court proceedings. ICE set up YACMP despite calls from [nearly 90 national and regional organizations](#) for independent, community-based case management services separate and apart from ICE’s funding and surveillance apparatus.

This policy brief, produced by the Women’s Refugee Commission, National Immigrant Justice Center, and Young Center for Immigrant Children’s Rights, examines: 1) who are the youth impacted by this new ICE program; 2) what this program entails and how it compares with traditional case management programs; and 3) what we know about the corporation ICE has contracted to run this program. It has recommendations for effective case management for impacted youth.

1. Who are the youth impacted by this new ICE program?

YACMP targets 16,000 immigrant youth aged 18 and 19 across 17 cities: Baltimore, Boston, Chicago, Dallas, Denver, Detroit, El Paso, Houston, Los Angeles, Miami, New York, Orlando, Philadelphia, Phoenix, San Antonio, San Diego, and Washington, DC (see map on page 2). Youth enrolled in this new ICE program are likely to enter via one of three pathways: 1) as unaccompanied children who turn 18, and therefore “age out” of care in Office of Refugee Resettlement (ORR) custody, where federal law requires they be cared for if under 18; 2) as young adults placed in removal proceedings by ICE after years of living in US communities; or 3) as young people seeking safety who recently entered the US, with or without family. These youth are frequently eligible for a variety of forms of protection and lawful status—including asylum, Special Immigrant Juvenile Status, trafficking or crime survivor visas, or Deferred Action for Childhood Arrivals (DACA).

ICE PLANS TO SUBJECT 16,000 YOUTH TO YACMP EACH YEAR. WHERE ARE THOSE YOUTH LOCATED?



The young adults ICE plans to enroll in YACMP are particularly vulnerable and in need of individualized support, not an enforcement-oriented program. They have widely varying needs; some have lived in the United States for many years and have a strong support network here, while others have only recently arrived in the country and may need help with basic integration skills.

ICE acknowledges that these youth are “non-dangerous” and “low flight risk,” which signifies that there is little enforcement justification for imposing restrictions on their release. Yet instead of an emphasis on proven and appropriate case management, the program imposes restrictions under the guise of case management. For example, YACMP requires youth to report regularly and respond to their assigned case managers. ICE monitors non-compliance with this and other requirements and requires the contractor to escalate cases in which the Acuity International case manager does not receive a response from a youth after seven days, leaving youth vulnerable to risk of arrest and apprehension by ICE.¹ YACMP enrollment notices (see Appendix, p. 6) signal that youth cannot opt out of this program without a potential risk of detention,² even if they already have strong ties to local communities, are able to navigate immigration requirements, or already make use of community-based services.

2. What does this ICE program offer and how does it compare with traditional case management programs?

Although it contains the words “case management” in the program title, very little about the program plans seems to involve meaningful case management, whether by the contractor or envisioned referral services. YACMP’s primary objective is to [“promote compliance with participants’ release conditions,”](#) including any required reporting to ICE [Enforcement and Removal Operations (ERO)].³ In addition to conducting in-office and telephonic check-ins with youth, sharing information regarding youth with ICE ERO, monitoring immigration court proceedings, and providing assistance with repatriation, Acuity will conduct human trafficking screenings, inform youth of their legal rights and obligations, and provide referrals to community-based organizations.

Although Acuity will make referrals to service providers and document whether youth access those services, the program will not provide financial assistance to cover the costs of these services or provide support to ensure appropriate,

individualized services are identified in the first place, and that an individual is able to meaningfully access them. This is especially important when local organizations may already be stretched thin, and someone may need referrals to multiple organizations, with concerted follow-up, to ensure services are accessed. “Facilitating access,” as currently incorporated into YACMP, may otherwise be little more than relying on referrals as a proxy for case management, which is directly counter to case management best practices. Beyond these referrals, the program requires that youth enrolled in the program report for monthly telephone check-ins and quarterly (or even more frequent) in-person check-ins at a local Acuity office, as they would with a criminal probation or parole officer. Acuity is required to report youth who fail to answer check-in calls or appear at in-person check-ins to ICE ERO after it is unable to “locate” a young person for seven days.

YACMP at a glance

In order to enroll and monitor **16,000 youth**, ICE is paying **\$18.7 million** to Acuity International yearly. This nationwide program will impact youth in **17 cities**, with each Acuity International case manager managing **100 youth at a time**, largely to provide limited referrals and monitor youth. Youth will receive **\$0** to secure counsel, access mental health or social services, travel to appointments, or secure shelter. Community-based organizations providing services to youth (including mental, legal, and housing services) will receive **\$0** from this program.

[Publicly available materials](#) about YACMP indicate that Acuity will share all of its individual case information with ICE, without limitations on how the enforcement agency can use that information in service of its enforcement mission. This could lead to ICE using information gained by case managers from their clients against those same young people in their immigration cases, as happened previously when the [ORR shared therapists’ notes](#) on their child clients with ICE.

While YACMP’s case management programming based on individualized referrals to community-based services draws from a central pillar of [successful ATD models](#), the extremely high individual case-to-case manager ratio of 100 to one, coupled with the lack of resources and support necessary to ensure youth actually receive the referred services, make it unlikely that the program will successfully ensure that youth access the community-based services they need. Even licensed, experienced social workers—though licensing or even prior case management experience is [not a job requirement for YACMP case managers](#)—must typically [limit](#) their [caseloads](#) to ensure the effective delivery of individualized holistic services and support to their clients.

Moreover, youth in YACMP who fall short of any “goals” set by their case managers, particularly where they fall short of stability benchmarks like maintaining a steady address or affording cell phone service, could—in the absence of assurances by ICE to the contrary—face “step-up” to ICE’s electronic surveillance or even detention,³ rather than receiving the support they need to secure stable housing and economic independence. For instance, a March 2023 ICE report assessing the privacy impact of its ATD programs notes that the YACMP Program Orientation Attestation Form, which youth enrolled in the program must read and sign, “notif[ies] participants that the consequences of failure to comply with the requirements of the [YACMP] may result in a re-determination of their release conditions, arrest, and detention.”⁴ The privacy impact assessment (PIA) further specifies that ICE ERO may refer ATD participants who fail to comply with their release conditions for federal criminal prosecution.⁵

Finally, although the program ends when a young person turns 20 years old,⁶ the reality of extensive immigration court and US Citizenship and Immigration Services (USCIS) backlogs means that many will still be waiting to resolve their cases. Because they will already be enrolled in a formal ICE ATD program, this could also mean that they may be moved over to ICE’s Intensive Supervision Appearance Program (ISAP), which may entail [home visits and electronic monitoring](#) such as

GPS tracking via an ankle monitor. YACMP lacks clear safeguards to prevent the young people it purports to support from being placed under [invasive surveillance programs](#), an outcome that contradicts the very community stabilization goals of case management best practices (see chart).

Case Management Best Practices ⁷ vs. YACMP Practices			
Case Management		YACMP	
✓	Coordinate, plan, and secure services for client	✗	Plan and make referrals to services; “facilitate access” as needed
✓	Sustained follow-up where needed to ensure access occurred and monitoring of whether services match with client’s individual assessed needs	✗	Monitor only whether accessed referred services
✓	Voluntary; builds on client’s strengths	✗	Involuntary; focused on whether young person complies
✓	Advocate and intervene for client	✗	Report on young person to ICE
✓	Delivered by organization with social services expertise and community ties	✗	For-profit government defense and agricultural contractor
✓	Optimize client functioning and well-being	✗	Verify address, support repatriation, end when young person turns 20

3. What we know about Acuity International, the corporation ICE has contracted to run this program

ICE has retained Acuity International, a corporation formed in 2021 by the former federal contractor [Caliburn International](#). Caliburn was the private corporate entity that ran [Homestead](#), a massive unlicensed detention center for unaccompanied immigrant children in Florida that closed after multiple allegations of [sexual abuse](#) and [prison-like conditions](#). John Kelly, former Department of Homeland Security (DHS) Secretary under the Trump administration, was on the board of directors of this corporation that profited from the detention of immigrant children. Records show that Kelly is now [on the board of Acuity International](#).

The YACMP contract stands in broad contrast to Acuity’s regular portfolio. Acuity requires [no prior qualification or licensing](#) for the YACMP case managers it is recruiting. Acuity’s other contracts originated from the [Department of Defense and the Department of Agriculture](#).

Recommendations for effective case management for impacted youth

To be effective and truly in the best interest of immigrant youth, any post-18 support services must be voluntary, trauma informed, community based, and independent, driven by expertise in youth development and needs, and with clear restrictions on information-sharing with the government to ensure trust. YACMP does not align with these basic principles. A successful road map to support these youth requires the following:

1. **Decouple immigration enforcement and case management to prevent the exploitation of youth vulnerability for law enforcement ends.** Youth aged 18 and 19 years are still transitioning into adulthood and greater self-sufficiency—in fact,

[their brains are still developing](#)—and they may need support in accessing health, education, and legal representation services, especially in new communities. YACMP exploits this need for services by imposing a nominal case management program whose real focus is compliance with reporting requirements overseen by ICE rather than ensuring vulnerable young adults receive the services they need. ICE should fund experienced nonprofit organizations to meet youths' needs, without imposing reporting requirements that draw youth back into the risk of detention and deportation.

2. **Move case management services out of ICE altogether.** Key to case management best practice is moving the administration and funding of case management programs outside of ICE [in recognition of its inherent conflict of interest](#). ICE's role as police, prosecutor, and jailer in pursuit of deportation incentivizes the agency to resort to its law enforcement tools of surveillance and detention regardless of the reality that these practices only undermine the stabilization goals of case management and community support. Moreover, [research has shown](#) that fear of immigration enforcement and deportation is a barrier to accessing community services. Hiring a company with no expertise in serving youth to monitor and impose reporting requirements when the youth present no danger or flight risk does not advance their best interests or even advance the [goals of effective case management](#).
3. **Appoint counsel for all indigent people in immigration proceedings, as counsel is the best guarantee for compliance.** While the overwhelming majority of immigrants voluntarily appear for their hearings, [compliance is near universal when people have counsel](#). Compliance is thus best achieved by guaranteeing counsel, rather than through case management programming entangled with ICE's enforcement mandate. Moreover, case management best practices safeguard and facilitate rather than interfere with or impede the attorney-client relationship.
4. **Ensure that young people in immigration proceedings have access to voluntary community-based case management services that conform to best practices.** Our [organizations](#) have [advocated](#) for [years](#) for the government to replace its expensive and inhumane reliance on immigration detention and enforcement with [evidence-based case management programming](#) and [community support](#), extensively proven to be more cost- and compliance-effective and more humane. Rather than systematically enrolling youth in a monitoring program that infringes on their privacy and imposes unnecessary restrictions and requirements, the government should be funding and supporting independent, community-based programs that provide effective, collaborative case management to youth who voluntarily request those services.

Appendix: YACMP Enrollment Notice (redacted)



U.S. Immigration
and Customs
Enforcement

Programa de Gestión de Casos de Adultos Jóvenes

Debe participar en el Programa de Gestión de Casos de Adultos Jóvenes (YACMP, por sus siglas en inglés). YACMP está diseñado para ayudar a los jóvenes adultos como usted. Se le asignará un Gestor de Casos que le ayudará a cumplir con sus obligaciones de inmigración y le ayudará a acceder a recursos comunitarios o de otro tipo.

SUS RESPONSABILIDADES

Como participante en el programa, deberá cumplir con las condiciones de su puesta en libertad, entre las que se incluyen la obligación de presentarse ante una ERO del ICE y asistir a todas las audiencias del tribunal de inmigración. También se le pedirá que se presente a todas las visitas a la oficina de YACMP y que realice los controles telefónicos que especifique su Gestor de Caso.

PRÓXIMOS PASOS

Póngase en contacto con la Oficina YACMP para programar su primera cita por:

[Redacted contact information]

Por favor traiga todos sus documentos de inmigración a esta cita.

INFORMACIÓN ADICIONAL

¿Preguntas?

Si tiene alguna pregunta, llame al número mencionado anteriormente

Endnotes

- 1 US Department of Homeland Security Immigration and Customs Enforcement (ICE), Performance Work Statement: Juvenile and Family Management Unit Young Adult Case Management Program (hereinafter PWS), § 4.10.2, <https://imlive.s3.amazonaws.com/Federal%20Government/ID187013858655711635947227061169723425393/Attachment%201%20-%20%20PWS.pdf>.
- 2 A redacted copy of a YACMP enrollment notice in Spanish is attached as an appendix (page 6). The notice begins with a statement that translates to the following in English: “[You] must participate in the Young Adult Case Management Program.” Although ICE’s March 2023 report assessing the privacy impact of its ATD program, including YACMP, indicates that opting out is possible, the report also states that “[a] decision to opt out results in the usual non-detained docket requirements, including annual check-in requirements or depending on the circumstances, the individual may be detained for the duration of their immigration case.”
See [DHS/ICE/PIA-062 Alternatives to Detention \(ATD\) Program](#) at p. 20. The possibility of being detained as a consequence deprives young people of a meaningful choice to opt out.
- 3 ICE enrolls youth in YACMP by virtue of its statutory authority to determine the custody status of noncitizens in removal proceedings. See 8 U.S.C. § 1226. This same statutory authority gives ICE the discretion to change its custody determination at any time. As a result, ICE has complete discretion to change its custody status determination for any youth enrolled in YACMP at any time. A particular inflection point for changing the custody status determination that enrolled a youth in YACMP could be where youth fall out of contact with their Acuity case manager for more than seven days, resulting in an emergency report to ICE.
- 4 [DHS/ICE/PIA-062 Alternatives to Detention \(ATD\) Program](#) at p. 18.
- 5 8 U.S.C. § 1253(b) (willful failure to comply with terms of release under supervision). See [DHS/ICE/PIA-062 Alternatives to Detention \(ATD\) Program](#) at p. 6.
- 6 [DHS/ICE/PIA-062 Alternatives to Detention \(ATD\) Program](#) at p. 9.
- 7 Social work and related social service domains have spent decades developing and refining best practices for case management services. The case management best practices referenced here are drawn from two representative sources, The [National Association of Social Workers Standards for Social Work Case Management](#) and [Council on Accreditation Case Management Standards](#). These best practices have been fundamental to the success of effective case management alternatives to detention programs in the US and worldwide for migrants.

For more information, contact Katharina Obser, Women's Refugee Commission at katharinao@wrcommission.org;
Azadeh Erfani, National Immigrant Justice Center (NIJC) at aerfani@heartlandalliance.org;
or Jane Liu, Young Center for Immigrant Children's Rights at jliu@theyoungcenter.org.

Women's Refugee Commission

The Women's Refugee Commission (WRC) improves the lives and protects the rights of women, children, and youth who have been displaced by conflict and crisis. We research their needs, identify solutions, and advocate for programs and policies to strengthen their resilience and drive change in humanitarian practice. Since our founding in 1989, we have been a leading expert on the needs of refugee women, children, and youth and the policies that can protect and empower them.

www.womensrefugeecommission.org

National Immigrant Justice Center

The National Immigrant Justice Center ("NIJC") provides legal services and advocacy for unaccompanied children. Headquartered in Chicago, NIJC also offers a wide range of legal services to low-income immigrants, refugees, and asylum seekers on matters that include family-based immigration, applications for Lawful Permanent Residence, legal protections for immigrant victims of family violence, visas for immigrant victims of crimes, visas for immigrant victims of human trafficking, and more. Since its founding more than three decades ago, NIJC blends individual client advocacy with broad-based systemic change.

<https://immigrantjustice.org>

Young Center for Immigrant Children's Rights

The Young Center for Immigrant Children's Rights is a human rights organization that advocates for the rights and best interests of immigrant children. Young Center attorneys, social workers, and bilingual and bicultural volunteers are appointed as Child Advocate to ensure that unaccompanied and separated children facing the United States immigration system are not alone, their stories are heard, and their best interests, safety, and wellbeing are protected. Our goal is to change the immigration system so that children in immigration proceedings are recognized as children and their best interests are considered in every decision impacting them.

www.theyoungcenter.org

© 2023 Women's Refugee Commission, Inc., National Immigrant Justice Center (NIJC), and Young Center for Immigrant Children's Rights.

June 2023