

TESTIMONY OF

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For a Hearing

BEFORE

United States House of Representatives  
Committee on Homeland Security  
Subcommittee on Border Security and Enforcement  
Subcommittee on Oversight, Investigations, and Accountability

ON

“Trafficked, Exploited, and Missing: Migrant Children Victims  
of the Biden-Harris Administration”

November 19, 2024  
Washington, D.C.

Trafficked, Exploited and Missing Migrant Children  
Victims of the Biden-Harris Administration  
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Chairman Higgins, Ranking Member Correa, Chairman Bishop, Ranking Member Ivey, and Members of the Subcommittees, I appreciate the opportunity to speak about the evil of child trafficking caused by the open border policies under President Joe Biden and his administration.

I served in the United States Border Patrol for 24 years until I retired as a Deputy Patrol Agent in Charge in San Diego Sector. I worked under five presidential administrations and only one President secured the border, President Donald Trump. Border Patrol Agents went from working and being supported by the greatest border President in American history to the worst, President Joe Biden.

My last year in the Border Patrol was Joe Biden's first year in office. On his first day in office, I watched in horror as ninety-four Executive Orders cascaded down from Washington, D.C. obliterating every immigration policy that had provided the most secure border in America's history. Border Patrol Agents were forced to carry out unconstitutional orders that violated every law in the Immigration and Nationality Act.

By the action of Department of Homeland Security (DHS) Secretary, Alejandro Mayorkas, President Biden was able to create policy out of thin air, ignoring federal immigration law, and facilitating the largest mass invasion into America that the world has ever seen.

By the end of the Biden Administration, approximately 12,000,000 illegal aliens will have been arrested and, essentially, every one of those illegal aliens will have been released onto the streets of America.<sup>1</sup> In 2023 and 2024, DHS was forced to admit that Customs and Border Protection (CBP) used both commercial and private airlines to fly hundreds of thousands of illegal aliens into America. DHS also openly admits to losing 3,000,000 illegal aliens as they absconded through the unprotected and open borders. These illegal aliens are classified as "get-aways". DHS admits to arresting, releasing, flying into America, and losing between fifteen and sixteen million illegal aliens in four years.

The data used by DHS and CBP are misleading and false. For the record, immigration experts believe that the flights into America carried millions of illegal aliens. The true number of "get-aways" who crossed the border is, actually, between 15,000,000 and 18,000,000 illegal aliens. The total and true number of illegal aliens entering America in four years is 30,000,000.

After serving in the Border Patrol for 24 years, spending a year researching and writing a best-selling book entitled *INVADED: The Intentional Destruction of the American Immigration System*,<sup>2</sup> and filming two documentaries: *WHAT IS TREASON? #TRAFFICKED*<sup>3</sup> and *WHAT IS TREASON? #INVADED*.<sup>4</sup> I state, with complete certainty, that Biden, Harris and Mayorkas intentionally, strategically, and purposely weaponized illegal immigration and used it as a tool to fundamentally transform America.

Biden, Harris and Mayorkas have committed the crime of treason against the United States of America.

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From the first day of Joe Biden's Presidency to the present, there are anywhere from 5,000 to 20,000 illegal aliens entering the United States of America each day. By the end of Biden's term in office, he will have accomplished the following:

- 30,000,000 illegal aliens will have entered America unlawfully
- Approximately 11,000,000 – 12,000,000 illegal aliens will have been arrested and released into America
- Over 180 nations will be reported in the United States Border Patrol arrest data
- Approximately 60-70 percent of all illegal aliens are single-adult military-aged males
- Over 932,000 Venezuelans will have illegally entered America
- Over 500,000 Haitians will have illegally entered America
- Over 131,000 Russians will have illegally entered America
- Over 326,000 Chinese will have illegally entered America – and of these, there are tens of thousands that are soldiers from the People's Liberation Army (PLA)
- Over 250,000 Special Interest Aliens/Terrorists will have illegally entered America
- 60-80 percent of every woman and child will have been raped or sexually assaulted making their journey to America
- Over 550,000 Unaccompanied Alien Children (UACs) will have illegally entered America
- The vast majority of the 550,000 UACs will have been lost into labor and sex trafficking

The destruction of America is visible in every facet of American life from the biggest metropolitan cities to the smallest towns across America. The United States of America will have spent over one trillion dollars in four years to fund the needs of the over 50,000,000 illegal aliens that populate our nation. Between one in six and one in seven residents in America is an illegal alien. America has suffered the greatest demographic shift in modern history. The fundamental transformation of America has begun.

This invasion of 30,000,000 illegal aliens entering America in four years was created and facilitated by Democrat representatives in office but it was funded by Republican representatives in office. This act of treason is a uni-party effort.

Inside this invasion, the unspoken evil of child trafficking and, more specifically, child sex trafficking, has flourished. At the end of this current administration, the number of children trafficked will have grown to over 550,000 UACs. This horrific number of children will have been arrested, released into America and then lost. To put this into context: during President Trump's last year in office, Customs and Border Protection (CBP) arrested 30,557 UACs who were accounted for and not lost. Conversely, in the first year of Biden's presidency, the CBP arrested over 147,975 UACs, most of which are unaccounted for and lost.

In a 2023 Congressional Hearing, Health and Human Services (HHS) Secretary Xavier Becerra denied knowing that over 85,000 UACs had been lost. In another Congressional Hearing that same year, Director of Office of Refugee Resettlement (ORR) Robin Marcos was forced to concede that her department had no contact with over 85,000 UACs. They were lost.

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What did the DHS, HHS, and ORR do to correct this humanitarian disaster? Nothing. In fact, all three agencies created further policies and procedures to increase the efficiency of moving UACs, their ages ranging from newborn infants to 17-year-olds, from the border to the interior of the United States to unknown and unvetted sponsors. Unaccompanied alien children were being handed off to total strangers. They then disappeared into the darkness of labor and sex trafficking.

What was the result of this criminal negligence?

A year later, the Inspector General with oversight of DHS stated in a 2024 report that the number of UACs lost had surpassed 320,000. When you understand the policies and procedures of what constitutes a “welfare check” on UACs establishing them as accounted for and protected, you would then know the horrific truth that every one of the 550,000 or more UACs in America are lost.

These children are being labor-trafficked, sex trafficked, barbarically harvested for their organs and, quoting President Trump, “A lot of them are already dead.”

My business partner, Ryan Matta, and I spent eight months traveling across America while filming our documentary entitled, *WHAT IS TREASON? #TRAFFICKED*.<sup>3</sup> What we discovered, through numerous interviews with Border Patrol Agents, CBP Officers, DHS employees, FBI Agents, former CIA Officers, HHS whistleblowers, FBI whistleblowers, organizations that combat child sex trafficking and individuals that worked inside the non-governmental organizations (NGOs) that traffic children, were the grotesque evils of child sex trafficking and criminal acts committed by our own government.

The current federal government knew, in the first few months of the Biden-Harris Administration, that the number of UACs entering the country was spiking to never-before seen statistics. However, they did nothing to stop it. Instead, the conveyor belt of child-trafficking production was more heavily funded and procedures were put in place to ensure the maximum output of these innocent and most vulnerable children.

The Biden-Harris government knows that transnational criminal organizations from across the globe have discovered and are exploiting loopholes in the child sponsorship program. Human smuggling cartels specializing in children are smuggling the children over the border. They then wait for the Border Patrol to arrest these children. Because of the Flores Settlement Agreement, the Border Patrol’s internal procedures are to release these children to NGOs within 72 hours. The NGOs then have a total of 20 days from the date of arrest to release the children. These NGOs then coordinate with HHS and ORR to reunite these children as quickly as possible with the same cartels that reside within the United States. There are no background checks or DNA tests on the sponsors who receive these children. There are no site visits to ensure the child’s safety or to confirm the child has been taken to a home that actually exists.

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The probability that thousands of these UACs are being raped at this very moment is 100 percent.

After several exhaustive months filming, interviewing and then editing this documentary, I state, without reservation, that the United States federal government is the world's largest child sex trafficking organization in modern history. This is not just my belief, it is the adamant belief of every person we interviewed for this documentary.

The call to action has three parts. All three parts are to happen simultaneously:

1. Every necessary measure is to be taken to ensure all four borders of the United States of America is sealed shut.
2. A national law enforcement emergency shall be declared in order to locate and rescue every single one of the missing 550,000 unaccompanied alien children.
3. A full-scale investigation of every U.S. department, agency and every Non-Governmental Organization (NGO) participating in this criminal act shall be launched. Every person involved shall be arrested.

The intentional opening of our borders is an act of treason. I encourage questions so I may further articulate this allegation.

1. <https://www.cbp.gov/newsroom/stats/nationwide-encounters>

2. Carrell, J.J.. *INVADED: The Intentional Destruction of the American Immigration System*. Unites States of America: Carrell, 2023.

3. Matta, Ryan, director. *WHAT IS TREASON? #TRAFFICKED*. Carrell Entertainment, LLC & Ryan Matta Media, 2024, 1 hr., 46 min. <https://rumble.com/v5ewdmy-what-is-treason-trafficked-vip-only-do-not-share-private-screening.html>, <https://www.thisistreason.com>

4. Matta, Ryan, director. *WHAT IS TREASON? #INVADED*. Carrell Entertainment, LLC & Ryan Matta Media, 2024, 1 hr., 44 min. <https://rumble.com/v5k0tr8-what-is-treason-inaved-released-101024-by-jj-carrell-and-ryan-matta.html> , <https://www.thisistreason.com>

**Alicia Hopper**

**Consultant on Human Trafficking, Sadulski Enterprises, LLC.**

**Written Statement of Proposed Testimony**

Chairman Higgins, Chairman Bishop, Ranking Member Correa, Ranking Member Ivey, and distinguished members of the committees, thank you for prioritizing this urgent issue. We are facing one of the most significant humanitarian crises of our time. In the five minutes I have to deliver this testimony, women and children here in the United States will be sold into trafficking and disappear. Unaccompanied migrant children will continue to be exploited, extorted, abused, and neglected—tragically, a direct consequence of the federal government's failure to meaningfully vet their sponsors.

This is not a political issue, this is a humanitarian crisis, one that is costing the lives of countless children. I've witnessed this devastation firsthand. I have been on the front lines at the border, in Mexico, and throughout Central America, and what I've seen is gut-wrenching. The disastrous effects of the current administration's immigration policies are fueling child trafficking, and I have seen cartel members, with children in their grasp, operating with impunity at our borders.

In my efforts to further grasp the depth of this crisis, including the trafficking of children, I have taken steps to understand the inner workings of these operations. I've interviewed former sex traffickers and cartel members, both in the U.S. and abroad, who are currently or were previously incarcerated. These conversations have given me critical insights into the realities at our Southwest Border.

Cartels bring trafficking victims to the border and rely on a vast network of gangs to facilitate the trafficking operations within the U.S. This activity has surged under the Biden Administration. My research has uncovered the complex system of stash houses on both sides of the Southwest Border, where gangs and cartels hold and exploit their victims. I've personally seen stash houses used by the Jalisco New Generation Cartel as lookout points, and I've encountered cartel members both at the border and in Mexico, continuing their operations with alarming boldness.

**Jacumba, CA / Mexico Border**

Recently, I returned from the border with my research partner, Dr. Jarrod Sadulski. During our time there, we interviewed a property manager overseeing a large, unfenced border property in the Jacumba, CA area – a site frequently exploited by cartels and traffickers for migrant smuggling. What we uncovered was deeply disturbing.

On this property, migrants are led down one of two paths, depending on their ability to pay. Higher-paying migrants from Asia, the Middle East, and Turkey are funneled through a route that shows little evidence of exploitation. However, the second path, designated for poorer migrants from Central and South America, reveals a much darker reality. The property manager told us of the

consistent screams of migrant women and children being sexually assaulted - screams that are heard regularly along this path. Just two nights before our arrival, those horrifying cries echoed once again, but the property manager, out of fear for his own safety, didn't dare investigate. He knows all too well that neither law enforcement nor Border Patrol can protect him. This area, like many others, is controlled by the Jalisco New Generation Cartel, operating with impunity right on U.S. soil.

In one instance, a young, bloodied girl being chased ran up to him on the property. I walked both paths, and evidence of sexual assault was apparent on the second path. I found torn clothing indicative of exploitation, particularly of young female teenagers. I examined the sizes of clothing that reflected sexual assault. Some were children. I examined different parts of the trail where the sexual assault routinely occurs, which included a brush area that provides concealment if Border Patrol aircraft fly through the area.

Following my exploration of the alarming realities of human trafficking and exploitation, I ventured to another path in Jacumba, CA, notorious for the smuggling and trafficking of migrants. This route, like many others, is tightly controlled by the cartels—no one passes through without their approval or involvement. As I walked along the pathway near the border, discarded identifications littered the ground, many belonging to children. Initially, we wondered why so many were left behind—some valid, many forged, often burned, torn, or buried. Among the debris, I found the passport of a five-year-old Colombian girl, hauntingly staring back at me from the photo. In that moment, I was struck by the harrowing realities children like her face at the hands of these cartels.

Delving deeper into this crisis, we uncovered a chilling reality: individuals are deliberately erasing their identities to enter the U.S. under false names. Our host, Cory Gautereaux, who lives on the border and has offered invaluable insights into this situation, has collected hundreds of IDs issued from various countries around the world. This collection underscores the global scope of this tragic phenomenon. The discarded identifications highlight a disturbing truth—those smuggled through this area effectively lose their original identities. This issue extends beyond immigration; it poses a significant national security threat. Some individuals are concealing criminal histories or their countries of origin, but when children's identities are erased, even darker questions emerge: Where are they coming from? Are they being exploited? What horrors have they endured to reach this point?

To gain a more comprehensive understanding, I interviewed a former Sinaloa Cartel affiliate who had previously worked as a sex trafficker in Southern California before his incarceration. His extensive knowledge of trafficking in this region revealed that cartels routinely discard IDs to create new identities just before crossing the border. He detailed how scanners are utilized in vans to produce these new documents. At one point along the border, we even observed a van on the Mexican side that matched his description, reinforcing the alarming reality of how these operations

are executed. This ongoing crisis demands urgent attention and action to protect vulnerable lives caught in this web of exploitation.

### **Live & In-Person Migrant Border Crossing**

While conducting human trafficking research at the border last month, I witnessed a shocking scene: a child being handed through the border wall panels by a masked cartel member to an adult on the other side. Two cartel members in ski masks were present during this exchange. With Border Patrol nearby, we approached the area, and from about 15 feet away, I captured this photo as one of the cartel members flashed a peace sign (introduce picture as evidence). They utilized a black rope ladder to smuggle over two adults connected to the child. One cartel member even took a photo to document the successful crossing, referred to as “proof of life.”

### **Staging Sexual Violence**

A disturbing aspect of cartel operations is the sexual exploitation that occurs at specific points along the smuggling route. Scholarly research spanning over a decade has documented what cartels refer to as "rape trees" - designated spots along the route where such exploitation takes place. These trees are marked by hanging undergarments as a grim symbol of the violence endured by victims ([The Performative Speech and Silence of Rape Trees: Staging Sexual Violence Against Migrant Women in the U.S.-Mexican Borderlands](#)). Tragically, during our time on the border, we discovered a rape tree, and our host informed us that since our visit, additional undergarments have been found on that same tree. We also observed a van used for smuggling people to the border, which contained a large amount of undergarments that further, further reflecting the pervasive sexual exploitation in this area.

### **Office of Refugee Resettlement**

Under the current presidential administration, the Office of Refugee Resettlement (ORR) has processed and sent [329,457 unaccompanied children](#) to sponsors between Oct. 2021 and July 2024. In contrast, only 124,627 children were sent to sponsors during the period from Oct. 2017 to Sep. 2020. This represents a staggering 164% increase, highlighting a significant rise in the number of children who are at grave risk while being smuggled and trafficked to the border. This alarming trend underscored the urgent need for effective policies and protections to safeguard these vulnerable children.

Cartels are actively targeting migrant children for exploitation in the U.S. through the Unaccompanied Children (UC) program, and this alarming trend has intensified under the Biden Administration. The cartels have taken advantage of the fact that the administration no longer requires DNA testing to verify familial relationships with child sponsors. It is essential for you to understand the dire circumstances faced by these innocent unaccompanied children. One heartbreaking case involved a little girl who crossed the border in Arizona with individuals claiming to be her family, though they were not. This situation is tragically common. When she



arrived, she had bruises covering her legs and complained of stomach pain, prompting her to be taken to the hospital as a precaution. There, it was discovered that this little girl had been raped. Even more distressingly, despite the trauma she endured, she was returned to those who falsely claimed to be her family due to the discontinuation of DNA testing. This is a horrifying reality that is happening right here in the United States.

Children in migrant groups are often sold to traffickers when it becomes apparent that their families cannot afford the unexpected expenses imposed by the coyotes embedded within these smuggling networks. In a migrant shelter in McAllen, Texas, a mother who had traveled to Texas from Reynosa, Mexico, refused to let her child out of her arms. She shared with staff that she had been robbed not only of her belongings but also of the two other children she had started the journey with in Mexico, all because she lacked the money for bribes. This heart-wrenching situation underscores the desperation that families often endure in their impossible struggle to find safety.

The strategies employed by cartels are constantly evolving and rapidly improving, as they increasingly leverage cloud technology to monitor the finances and demographic information of child trafficking victims. This creates a digital trail that is often completely overlooked. Cartels provide unaccompanied migrant children with the names and contact information of individuals designated as potential sponsors once the children are processed by the Office of Refugee Resettlement.

Post-placement protections for migrant children are alarmingly inadequate. In one instance, law enforcement conducted a welfare check on 25 unaccompanied migrant children but could only locate two of them. Disturbingly, some sponsors reported that the children never arrived at their intended destinations. In another troubling instance, a sponsor provided an address in Delaware that turned out to be nothing more than an open field, raising serious concerns about the safety and legitimacy of such sponsorships.

Based on my research, ORR has failed to adequately protect unaccompanied children in several critical areas:

- **Vetting Sponsors:** There is a significant absence of thorough background checks, leading to children being placed with sponsors who in some cases have turned out to be gang members, individuals on terror watch lists, known pedophiles, or those who ultimately abuse or traffic them.
- **Home Studies:** ORR has not conducted home studies to ensure that children are being placed into suitable environments.
- **Information Sharing:** The agency does not share sponsor information with state child protective services or law enforcement, hindering efforts to ensure child safety.
- **Well-Being Checks:** After a child is placed with a sponsor, ORR makes only a single phone call to check on their well-being. If neither the child nor the sponsor answers, no further follow-up is conducted.

- **Tracking Unaccompanied Children:** The failure to track unaccompanied children once they are delivered to sponsors has resulted in ICE being unable to issue Notices to Appear (NTAs), exacerbating the risks these children face.

## NGOS

This lack of oversight extends beyond sponsor vetting; through my research, I've discovered that the Office of Refugee Resettlement (ORR) relies on NGO contractors to manage influx facilities. This raises critical concerns about the need for greater accountability within these facilities to ensure the safety of migrant children. Additionally, NGOs often use staffing agencies to provide personnel, which has resulted in inadequately vetted staff having unsupervised access to children, without the necessary background checks or security clearances.

## Endeavors

I conducted interviews with auditors tasked with inspecting the NGO Endeavors in Pecos, Texas. One auditor explained that while ORR has an onsite monitor, they often receive “filtered information” from Endeavors regarding what is actually happening at the facility. This lack of transparency can hinder ORR’s ability to be aware of incidents and ensure compliance with their policies. A former supervisor at the Endeavors facility detailed how, during a surge of unaccompanied children, the facility was grossly unprepared. Staff arrived with little to no experience or training, and background checks, including fingerprinting, were sometimes completed a year after hiring.

Case managers on site reported that the same addresses were frequently used to sponsor children, raising further red flags about the vetting process. Although the facility is designed to accommodate children aged 13 to 17, the former supervisor explained that Endeavors sometimes knowingly allowed adults to remain, opting not to process the paperwork that would alert ICE to their status and prevent deportation. The third-party auditor and compliance supervisor also shared that Endeavors leadership discouraged her from documenting concerns in writing, further obstructing transparency regarding sponsor vetting.

The dysfunction in the Unaccompanied Children (UC) system is so pronounced that during a recent flight from San Diego to Florida, I encountered several unaccompanied children onboard. When I inquired with the flight attendant about how common it is for unaccompanied minors to travel without escorts, she confirmed it is a frequent occurrence. She also mentioned that UC migrant children are often taken to the wrong airport or dropped off at gates with no waiting sponsors, highlighting the systemic issues at play.

The ongoing crisis involving the exploitation of children through the UC program underscores the urgent need for reform in how we manage this system to mitigate further risks of exploitation and trafficking.

## **Human Trafficking Involving Juvenile Organs**

Building on the systemic issues highlighted earlier, it's crucial to address one of the more insidious aspects of human trafficking: organ harvesting. Recently, I conducted research in a prison in Central America, where I spoke with a former sex trafficker and a member of a Mexican cartel incarcerated for arms trafficking. Through these discussions, I learned that organ harvesting thrives due to the desperate demand from buyers. When families face the anguish of having a dying loved one and can't find the needed organ, they often resort to traveling to Mexico in search of a solution.

The trafficker recounted chilling details of witnessing multiple organs harvested in Merida, Mexico, noting that such practices are alarmingly common in both veterinary clinics and hospitals in the region. He emphasized that American buyers frequently seek out these illicit organ trades. Disturbingly, news reports from August 2024 surfaced about two American college girls who may have been drugged with the intent of having their organs stolen while on the Yucatan Peninsula.

In my conversation with the former sex trafficker and ex-Sinaloa cartel member, he revealed the lengths family members will go to for a dying relative, illustrating how organ traffickers exploit this vulnerability. These traffickers often take what he described as a “custom order” for specific organs and then target areas where migrants congregate on their way to the U.S. border. Migrant camps, in particular, serve as hotspots for exploitation, leaving individuals especially susceptible to these heinous acts.

The former sex trafficker also pointed out that under the Biden Administration, human trafficking has escalated, as cartels and gangs are reaping substantial profits. Many organizations that previously shied away from human smuggling are now deeply involved, capitalizing on the current lax immigration policies.

Despite the grim realities I've uncovered regarding human exploitation at the border, I remain hopeful — hopeful in you. I believe in the power of bipartisan action to enact meaningful legislation that can alleviate the crisis threatening lives. The current immigration system fails everyone, and it is imperative to establish legal pathways that include proper vetting for entering the United States. We must send a clear message to the cartels that the border is no longer open and empower Border Patrol with the funding and resources necessary to secure the border rather than merely processing migrants who have been smuggled into the country.

Thank you again for the opportunity to share my research and I welcome your questions.

*Alicia Hopper*

Alicia (Ali) Hopper

Sadulski Enterprises, LLC



## Testimony

Before the Subcommittees on Border Security and Enforcement and Oversight, Investigations, and Accountability, Committee on Homeland Security, House of Representatives

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For Release on Delivery  
Expected at 2 p.m. ET  
Tuesday, November 19, 2024

# UNACCOMPANIED CHILDREN

## Efforts by the Office of Refugee Resettlement to Address GAO Recommendations

Statement of Kathryn A. Larin, Director,  
Education, Workforce, and Income Security

# GAO Highlights

Highlights of [GAO-25-107840](#), a testimony before the Subcommittees on Border Security and Enforcement and Oversight, Investigations, and Accountability, Committee on Homeland Security, House of Representatives

## Why GAO Did This Study

Thousands of children enter the United States without a parent or guardian and without lawful immigration status each year. Many unaccompanied children have been exposed to trauma and violence and travelled great lengths to get to the United States. In addition, unaccompanied children may be at greater risk becoming child trafficking victims.

These children are generally referred to ORR for care by the Department of Homeland Security. ORR is responsible for coordinating and implementing the care and placement of unaccompanied children. In fiscal year 2023, ORR cared for about 119,000 unaccompanied children, according to agency data.

This testimony summarizes findings from GAO's [2016](#) and [2020](#) reports on ORR's role in the care and release of unaccompanied children. It provides an update on ORR's efforts to address nine recommendations contained in those reports. The reports identified several significant lapses in ORR's implementation of policies and procedures that could affect the quality of care provided to these children.

GAO's 2016 and 2020 reports contain a detailed description of the methodology used. Generally, GAO reviewed relevant federal laws and regulations and ORR policies and monitoring documentation. GAO also obtained the views of a range of relevant stakeholders such as ORR officials, state licensing agencies, staff at grantee facilities, and others.

View [GAO-25-107840](#). For more information, contact Kathryn A. Larin at (202) 512-7215 or [larink@gao.gov](mailto:larink@gao.gov).

November 19, 2024

## UNACCOMPANIED CHILDREN

### Efforts by the Office of Refugee Resettlement to Address GAO Recommendations

#### What GAO Found

The Department of Health and Human Services' Office of Refugee Resettlement (ORR) has taken several steps to address prior GAO recommendations related to its role in caring for unaccompanied children—those that enter the United States without a parent or lawful immigration status. ORR awards grants to providers that operate facilities to house and care for unaccompanied children.

In its 2020 report, GAO found that ORR had awarded grants for 219 facilities operating in 25 states. ORR and state licensing agencies each play a role in overseeing facilities and ensuring that they meet health and safety standards, among others. Facilities generally must be licensed to operate in the state.

ORR took steps to sufficiently address five GAO recommendations, while ORR has partially addressed four others. The nine recommendations were related to:

- **Ensuring care providers are qualified (three recommendations).** GAO's 2020 report found that ORR's grant announcements used to solicit care providers for unaccompanied children were unclear. Specifically, it was unclear what information applicants were to submit on their licensing status and related concerns. This information helps ensure that providers are qualified to care for unaccompanied children. ORR took steps to address two recommendations that staff verify applicants' licensing and performance information. ORR partially addressed a third recommendation by requiring in recent announcements that applicants report any allegations of abuse or neglect or adverse licensing actions. GAO will close this recommendation when ORR clarifies that applicants should report licensing issues at all facilities that they operate.
- **Oversight and monitoring of facilities (three recommendations).** GAO's 2020 report also found that ORR did not provide clear instructions to grantees on including state licensing citations in their performance reports to ORR, which is needed for effective oversight of ORR facilities. ORR addressed two of GAO's recommendations by collecting information from its grantees on any state licensing citations and notifying grantees and ORR staff that grantees were required to report this information. ORR also addressed a third recommendation to develop plans to help meet its monitoring goals.
- **Information sharing (two recommendations).** In its 2020 report, GAO also found limited information sharing between ORR and state licensing agencies. ORR has partially addressed the recommendations by establishing communication channels and points of contact in some states. GAO will close the recommendations when ORR completes outreach to all states.
- **Tracking post-release services (one recommendation).** GAO's 2016 report found that there was limited information available on post-release services that ORR provides. These services include linking families to education and community resources, in-home counseling, and case management. Tracking these services would allow the information to be compiled in summary form and provide useful information to ORR and others. GAO will close this recommendation when ORR completes improvements to its case management system to enable tracking of post-release services.

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Chairmen Higgins and Bishop, Ranking Members Correa and Ivey, and Members of the Subcommittees:

Thank you for the opportunity to discuss our work related to the Department of Health and Human Services' (HHS) Office of Refugee Resettlement's (ORR) responsibilities for unaccompanied children. Every year, thousands of children enter the United States without a parent or guardian and without lawful immigration status. Primary responsibility for ensuring the health, safety, and well-being of these children after they enter the country lies with ORR.

In 2016 and 2020, we issued reports related to ORR's role in the care and release of unaccompanied children.<sup>1</sup> These reports identified several significant lapses in ORR's implementation of policies and procedures that could affect the quality of care provided to these children. Our recent efforts have focused on monitoring the agency's progress in addressing recommendations contained in those reports.<sup>2</sup> Of nine recommendations we made in our 2016 and 2020 reports, ORR has addressed five of them.<sup>3</sup> ORR has partially addressed the remaining four recommendations.

My statement today will focus on ORR's efforts related to: (1) ensuring care providers are qualified; (2) overseeing and monitoring facilities that care for unaccompanied children; and (3) tracking services that are provided to these children after they are released to sponsors. My statement is based primarily on the findings from our 2016 and 2020 reports. Each of our prior reports contains a detailed description of the

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<sup>1</sup>GAO, *Unaccompanied Children: HHS Can Take Further Actions to Monitor Their Care*, [GAO-16-180](#) (Washington, D.C.: Feb. 5, 2016) and GAO, *Unaccompanied Children: Actions Needed to Improve Grant Application Reviews and Oversight of Care Facilities*, [GAO-20-609](#) (Washington, D.C.: September 15, 2020).

<sup>2</sup>We have also issued reports related to the care and custody of unaccompanied children while they are in the custody of the Department of Homeland Security. For more information, including the status of recommendations that we have made in these reports, see: GAO, *Unaccompanied Alien Children: Actions Needed to Ensure Children Receive Required Care in DHS Custody*, [GAO-15-521](#) (Washington, D.C.: July 14, 2015) and *Southwest Border: Actions Needed to Improve DHS Processing of Families and Coordination between DHS and HHS*, [GAO-20-245](#). (Washington, D.C.: February 19, 2020).

<sup>3</sup>There are a total of 11 recommendations contained in our 2016 and 2020 reports. Nine are discussed in this testimony. This testimony does not discuss two recommendations in the 2016 report, one of which relates to how ORR determines the number of beds needed to house unaccompanied children, and one of which is similar to a monitoring-related recommendation in our 2020 report. ORR has addressed both these recommendations.

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methodology we used. Generally, we reviewed relevant federal laws and regulations and ORR policies and monitoring documentation. We also obtained the views of a range of relevant stakeholders such as ORR officials, state licensing agencies, staff at ORR grantee facilities, and others.

The work upon which this statement is based was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Unaccompanied children are those who arrive in the U.S. without lawful immigration status and without a parent or guardian available to provide care and physical custody for them. These children are generally referred to ORR for care by the Department of Homeland Security.<sup>4</sup> ORR is responsible for coordinating and implementing the care and placement of unaccompanied children.

ORR is required to promptly place unaccompanied children in its custody in the least restrictive setting that is in the best interest of the child. In addition, ORR must provide proper physical care, including suitable living accommodations, and appropriate medical care and educational services. According to ORR, all children in its care receive classroom education, mental and physical health services, case management, recreation, and unification services that facilitate their release to family members or other sponsors who can care for them.

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<sup>4</sup>Generally, children are to be transferred from DHS to HHS custody within 72 hours after a determination is made that they are unaccompanied children. In past work, we have recommended that both DHS and HHS should collaborate to address information sharing gaps to ensure that ORR receives information needed to make decisions for unaccompanied children, including those apprehended with an adult. The departments concurred with these recommendations and they have been partially addressed based on a number of steps DHS and HHS have taken to better share information on unaccompanied children. As of September 2024, the departments are continuing to work on a new interagency agreement to govern information sharing. [GAO-20-245](#).

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ORR awards grants to care providers that operate facilities to house and care for unaccompanied children.<sup>5</sup> The majority of children in ORR custody are cared for in shelter facilities. However, some are cared for in other settings, such as secure shelters for children with an offender history or residential treatment centers for children with diagnosed mental health disorders. In 2020, we reported that ORR had awarded grants for 219 facilities operating in 25 states.<sup>6</sup>

ORR and state licensing agencies each play a role in overseeing facilities and ensuring that they meet health and safety standards, among other things. With a few exceptions, facilities must be licensed to operate in the state.<sup>7</sup> Generally, both state licensing agencies and ORR monitor the facilities.

The number of unaccompanied children referred to ORR for care has increased substantially over time. In fiscal year 2012, nearly 14,000 children were referred to ORR. By fiscal year 2019, this number rose to more than 69,000 children. The agency's most recent data show that ORR cared for about 119,000 unaccompanied children in fiscal year 2023.<sup>8</sup> Many unaccompanied children have been exposed to trauma and violence and travelled great lengths to get to the United States. In

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<sup>5</sup>The grants are cooperative agreements that are funded for a 3-year project period. Funds are awarded for the second and third years based on approved continuation applications, subject to satisfactory progress by the grantee and a determination that continued funding would be in the best interest of the federal government.

<sup>6</sup>[GAO-20-609](#).

<sup>7</sup>In 2021, Texas and Florida state agencies that had previously licensed ORR grantee facilities were directed to discontinue these licenses. In states that do not allow state licensing of programs providing care and services to unaccompanied children, ORR expects these facilities to meet the state's licensing requirements that would otherwise be applicable. In addition, ORR funds facilities, which may be unlicensed, to provide temporary additional bed capacity during emergencies or influx periods. ORR provides additional monitoring to these unlicensed facilities.

<sup>8</sup>Department of Health and Human Services Office of Refugee Resettlement, "Fact Sheets and Data", <https://www.acf.hhs.gov/orr/about/ucs/facts-and-data>.



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addition, unaccompanied children may be at greater risk of child trafficking victimization.<sup>9</sup>

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## ORR Took Steps to Address Two of Three Recommendations Aimed at Ensuring Providers Caring for Unaccompanied Children Are Qualified

Our 2020 report found that ORR’s grant announcements used to solicit facilities to provide care for unaccompanied children were unclear about information applicants were required to submit regarding their licensing status or related concerns and past allegations of abuse or neglect. As a result, applicants provided inconsistent information.<sup>10</sup>

State licensing concerns may arise when providers do not meet certain standards, including standards related to the health and safety of children in care. We also found that ORR did not systematically confirm the state licensure information submitted by applicants or document a review of their past performance on ORR grants, when applicable.

Reviewing and obtaining consistent information on state licensure status and grantee past performance are key parts of ensuring that ORR providers are qualified to operate facilities to care for unaccompanied children. Taking these steps helps ORR reduce the likelihood of awarding grants to organizations that cannot obtain a state license or have a history of poor performance.

To address these concerns, we made three recommendations to ORR. The agency has taken steps to address two of them and has partially addressed the third recommendation (see table 1).

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<sup>9</sup>GAO, *Child Trafficking: Addressing Challenges to Public Awareness and Survivor Support*, [GAO-24-106038](#), (Washington, D.C.: December 11, 2023). Child trafficking generally refers to human trafficking involving individuals under the age of 18. Children may be trafficked for the purposes of commercial sexual exploitation, forced labor, or both. Survivors of child trafficking may suffer harmful, long-lasting effects, such as depression, suicidal thoughts, and substance use disorders.

<sup>10</sup>[GAO-20-609](#).

**Table 1: Status of GAO Recommendations to ORR Related to Ensuring Care Providers Are Qualified to Operate Facilities for Unaccompanied Children, as of September 2024**

Recommendation	Steps taken by ORR	Status
The Director of ORR should clarify in its grant announcements the information and supporting documentation applicants are required to provide in their grant applications with respect to their state licensing status, eligibility, and allegations and concerns.	ORR’s recent grant announcements have required applicants to report allegations of abuse and/or neglect, as well as any denial, suspension, and/or revocation of their license over the prior five years.	<b>Open: partially addressed.</b> We will close this recommendation when ORR releases future grant announcements clarifying that applicants are to report licensing issues at all facilities that they operate.
The Director of ORR should take steps to develop, and ensure that officials reviewing grant applications implement a process to verify the accuracy and completeness of information reported by grant applicants on state licensing status, eligibility, allegations and concerns.	ORR updated its guide for staff reviewing grant applications and training curriculum to add instructions for assessing licensing information included in grant applications. Staff are to determine whether the applicant is currently licensed and in good standing in the state in which it is proposing to provide services. Staff are instructed to take steps to verify the grantee’s license and determine whether it has any disciplinary actions against it.	<b>Closed: implemented.</b>
The Director of ORR should ensure that the grant review process includes a documented review of applicants’ past performance on ORR grants for those that have previously received grants to care for unaccompanied children. This could include, for example, a systematic review of previous quarterly and annual performance reports and a review of corrective actions issued by all ORR monitoring staff to all ORR-funded facilities previously operated by the applicant.	ORR updated its staff guidance and training curriculum on conducting and documenting reviews of grantee performance. ORR staff are to use information from grantee quarterly progress reports to ensure grantee performance is satisfactory and determine whether funding should be continued for another budget period. Staff are directed to pay particular attention to grantees’ descriptions of any issues they experienced in the past reporting period. This includes all documented state licensing allegations or concerns, any corrective actions issued by ORR or others, and the steps the grantee took to resolve these issues.	<b>Closed: implemented.</b>

Source: [GAO-20-609](#) and GAO review of Office of Refugee Resettlement (ORR) documentation. | GAO-25-107840

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## ORR Addressed Three of Five Recommendations Related to State Licensing Citations, Information Sharing, and Monitoring of Facilities Caring for Unaccompanied Children

ORR facilities generally must be licensed by a state licensing agency to provide residential care and services for unaccompanied children, or meet state licensing requirements if they are located in a state that does not allow state licensing of programs providing care and services to unaccompanied children, as previously noted.<sup>11</sup> States set the minimum standards of care for their facilities, including those related to child health and safety and physical building standards. State licensing agencies issue citations to state-licensed ORR grantees if licensing violations are found and grantees are expected to address them.

Our 2020 report found two areas lacking clarity regarding grantees' reporting of state licensing citations to ORR.<sup>12</sup> First, ORR did not provide clear instructions to grantees on whether and how they should include state licensing citations in their quarterly performance reports to ORR. Second, some ORR staff did not have a clear understanding of what grantees should report to them about state licensing citations. As we reported in 2020, ORR needs this information to have a record of state licensing deficiencies and whether they were addressed and to conduct effective oversight of ORR facilities.

To address these concerns, we made two recommendations to ORR that have been implemented by the agency (see table 2).

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<sup>11</sup>ORR also requires its grantees to comply with various other requirements, such as those related to fire, health, and other safety standards.

<sup>12</sup>[GAO-20-609](#).

**Table 2: Status of GAO Recommendations to ORR Related to Grantee Reporting of State Licensing Citations, as of September 2024**

Recommendation	Steps taken by ORR	Status
The Director of ORR should clarify in its instructions to grantees the information they are required to report on state licensing citations in their quarterly performance reports.	ORR is using its grantee quarterly performance report to collect information on any state licensing citations a grantee received during the quarter. ORR sent an email notifying grantees that they were required either to report any state licensing citations, suspensions, or revocations that the grantee or any subrecipients had received during the quarter or affirmatively note that no such licensing issues had occurred.	<b>Closed: implemented.</b>
The Director of ORR should take steps, such as through guidance or training, to ensure that project officers clearly understand the requirement that grantees report state licensing citations at any of their facilities within 24 hours and include state licensing citations in their quarterly performance reports.	ORR updated its staff training materials to clearly state that grantees must report a license revocation or suspension to ORR within 24 hours and that licensing citations should be reported in the section of the quarterly performance reports on significant findings and events.	<b>Closed: implemented.</b>

Source: [GAO-20-609](#) and GAO review of Office of Refugee Resettlement (ORR) documentation. | GAO-25-107840

Our 2020 report also found that information sharing between ORR and state licensing agencies was limited. In addition, state licensing agencies and ORR staff said that improved information sharing would benefit their monitoring of facilities. Information sharing between ORR and state licensing agencies is important to ensure that both entities are aware of ongoing issues at ORR facilities.

To address these concerns, we made two recommendations, which ORR has partially addressed (see table 3).

**Table 3: Status of GAO Recommendations to ORR Related to Information Sharing Between ORR and State Licensing Agencies, as of September 2024**

Recommendation	Steps taken by ORR	Status
The Director of ORR should work with state agencies that license ORR-funded facilities to develop a plan for mutual information sharing, including processes for ORR outreach to states during the grant application review process and ongoing information sharing on ORR and state monitoring processes and identified deficiencies.	ORR is working to connect with state licensing agencies to establish communication channels to discuss any questions about licensing requirements that arise during the grant application review process. According to ORR, its goal is to develop mutually beneficial information-sharing relationships. ORR has entered into a Memorandum of Agreement with one state licensing agency.	<b>Open: partially addressed.</b> We will close this recommendation when HHS has demonstrated its outreach to all states where it has licensed grantee facilities about developing information-sharing protocols.
The Director of ORR should ensure that ORR provides and maintains a current point of contact for each state agency that licenses ORR grantees to facilitate information sharing regarding ORR-funded facilities.	ORR had a list of points of contact at 49 states' licensing agencies, as of February 2024. According to ORR, it plans to update the spreadsheet quarterly.	<b>Open: partially addressed.</b> We will close this recommendation when ORR has demonstrated that it has provided an ORR point of contact to state licensing agencies to whom they can direct questions or concerns.

Source: [GAO-20-609](#) and GAO review of Office of Refugee Resettlement (ORR) documentation. | GAO-25-107840

With respect to monitoring, ORR requires grantees to take corrective action to address noncompliance it identifies through monitoring. Our 2020 report found that ORR had not met some of its monitoring goals or notified grantees of the need for corrective actions in a timely manner.<sup>13</sup> We also found that ORR had not ensured the facilities it funded were audited for compliance with standards to prevent and respond to sexual abuse and sexual harassment of children in their care, as required by ORR regulations. Without action, ORR risked continuing to not meet its own monitoring goals and requirements, which are designed to ensure the safety and well-being of children in its care.

To address these concerns, we made one recommendation, which ORR has implemented. Our recommendation called on ORR to develop a plan to guide and focus the agency's efforts to meet its goals to:

- conduct on-site monitoring visits to each facility at least every 2 years in accordance with ORR policy,
- report any noncompliance to the facility within 30 days of the site visit, in accordance with ORR policy, and

<sup>13</sup>[GAO-20-609](#).

- 
- conduct an audit of each facility's compliance with ORR standards on preventing and responding to sexual assault.

ORR fully addressed our recommendation by developing plans to address these issues. One plan for calendar year 2024 articulates ORR's goals to increase its workforce capacity to meet monitoring needs and submit monitoring reports within ORR's required timeframes. It also identifies targets, timeframes, and staff responsible for meeting its on-site facility monitoring goals. In addition, in October 2021, ORR contracted with an outside organization to conduct compliance audits related to preventing and responding to sexual assault, and this contract specifies timeframes for conducting the audits.

Going forward, continued work remains for ORR to meet the targets established in its plan. According to ORR officials, they lack the staff resources to fully meet their goals for increased monitoring of some facilities. For example, ORR documentation shows that as of April 2024, staff had met the requirement to monitor all of its standard, state licensed facilities within a two-year period. However, 24 facilities in Texas and Florida, which no longer license ORR grantees, were overdue for the more frequent, quarterly visits ORR now conducts to these facilities.<sup>14</sup> Further, in fiscal year 2023, ORR documentation shows that on average ORR staff took 31 days after a monitoring visit to submit the report to the facility, instead of the 30 days required to notify each facility as outlined by ORR policy. For seven facilities, staff took over 45 days to send the report.

With respect to auditing facilities' compliance with standards on preventing and responding to sexual assault, as of October 2023, ORR's new contractor had conducted audits at all facilities that had not been audited by the original contractor within the initial 3-year period set in regulation, according to ORR officials.<sup>15</sup> These officials told us they anticipated audits at an additional 70 facilities would be completed by October 2024. In addition, officials said that a newly formed Prevention of Child Abuse and Neglect team within ORR was working with the

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<sup>14</sup>For states that stopped licensing ORR grantees, ORR now conducts quarterly monitoring visits.

<sup>15</sup>Each facility that houses unaccompanied children must be audited at least once within 3 years of February 22, 2016, and during each three-year period thereafter. 45 C.F.R. § 411.111(a).

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contractor to ensure they meet the timelines specified in the contract going forward.

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## ORR Has Partially Addressed One Recommendation Related to Grantee Follow-up with Children and Their Sponsor After Release from ORR Care

In 2016, we reported that there was limited information available on post-release services provided to children after they leave ORR care.<sup>16</sup> Since that report, ORR has made changes to the timing and frequency of certain post-release services.<sup>17</sup> Specifically, in November 2023, ORR reported that post-release services providers would become responsible for a series of three virtual check-ins with all children and sponsors.<sup>18</sup> These providers would be expected to confirm that children are residing with their sponsors, enrolled in and attending school, aware of upcoming court dates, and healthy and safe.

Our recommendation from 2016 remains relevant. We recommended that ORR develop a process to ensure all information collected through its post-release efforts are reliable and systematically collected. Doing so, would allow this information to be compiled in summary form and provide useful information to other entities internally and externally.

ORR has begun taking some actions to address this recommendation, including awarding a contract in September 2023 to revamp its case management system known as the UC Portal. According to ORR, the contractor will replace and build technology to support the recent expansion of post-release services. The agency reported that responses from the virtual check-ins, including information on services provided, will be collected directly into the UC Portal.<sup>19</sup> In November 2023, ORR updated the UC Portal to include additional tracking of children post-

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<sup>16</sup>[GAO-16-180](#).

<sup>17</sup>At the time of our 2016 report, ORR provided post-release services to a small number of children, such as those who were victims of trafficking. ORR also conducted safety and well-being calls for all unaccompanied children released to sponsors. ORR guidance required the calls to occur 30 days after children were released from ORR care to sponsors. Staff were required to make a reasonable effort to contact the children and document the results of the call in the children's case files.

<sup>18</sup>From November 30, 2023 through July 31, 2024, unaccompanied children were most commonly released from ORR care to a sponsor that was a parent or legal guardian, according to ORR data.

<sup>19</sup>According to ORR's Policy Guide, post-release services may include linking families to educational and community resources, home visits, case management, in-home counseling, and other social welfare services, as needed.

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release, including screens to update the child’s current location, history of the child’s moves, and whom the child is living with.

ORR reported that by the end of 2024, the Portal will be updated further to enhance and digitize information on post-release services. We are continuing to monitor ORR’s efforts to address this recommendation and will close it once ORR completes improvements to the UC Portal and demonstrates that it can use the portal to collect reliable post-release services data and disseminate it internally and externally, as appropriate.

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Chairmen Higgins and Bishop, Ranking Members Correa and Ivey, and Members of the Subcommittees, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

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## GAO Contact and Staff Acknowledgments

If you or your staff have any questions about this testimony, please contact Kathryn A. Larin, Director, Education, Workforce, and Income Security at (202) 512-7215 or [larink@gao.gov](mailto:larink@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. GAO staff who made key contributions to this testimony are Andrea Dawson (Assistant Director) and Lauren Gilbertson (Analyst in Charge). Additional contributors to this testimony were David Barish, Rebecca Gambler, Jean McSween, James Rebbe, Vernetta Shaw, Almeta Spencer, David Watsula, and Adam Wendel.



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## Statement of HHS Whistleblower Tara Lee Rodas

Former Deputy to the Director of the Federal Case Management Team  
Detailee at the Pomona Fairplex Emergency Intake Site (EIS) in Pomona, California  
in service of Operation Artemis for the U.S. Department of Health and Human Services'  
(HHS) Administration for Children & Families (ACF) Office of Refugee Resettlement  
(ORR) Unaccompanied Children (UC) Program

*before the*

U.S. House of Representatives Subcommittee on Border Security and Enforcement and the  
Subcommittee on Oversight, Investigations, and Accountability

*concerning*

**“Trafficked, Exploited, and Missing:  
Migrant Children Victims of the Biden-Harris Administration”**

Tuesday, November 19, 2024  
2:00 p.m. EDT  
310 Cannon House Office Building

Chairman Higgins, Chairman Bishop, Ranking Member Correa, Ranking Member Ivey and distinguished members of the committee:

Thank you for inviting me to testify at this critical hearing on the crisis of trafficked, exploited, and missing migrant children. Chairman Bishop, I thank you for joining Senator Grassley and more than 40 other legislators in signing the letter to President Biden and Vice President Harris urging them to stop covering up the migrant child crisis.<sup>1</sup>

Today, my goal is to spark action: (1) action to rescue children and (2) action to prevent children from being lost in slave labor,<sup>2</sup> commercial sex,<sup>3</sup> organ harvesting,<sup>4</sup> and other unspeakable evils.<sup>5 6</sup> Prior to action, it's critical to obtain a comprehensive and detailed understanding of the data and information from all parties involved, including but not limited to HHS, DHS, and DOJ, as authorized under the Inspector General (IG) Empowerment Act of 2016.<sup>7 8</sup>

Today, as we speak, children are preparing to work grueling overnight shifts in slaughterhouses, restaurants, and factories.<sup>9</sup> Some children may die today in jobs they don't have the knowledge or skills to do<sup>10</sup> in order to repay never-ending debts to their smugglers and traffickers.<sup>11</sup> Today, children are being sold for sex.<sup>12</sup> Some children, girls and boys, will get sexually transmitted diseases.<sup>13</sup> Some girls – as young as 12, 11, or even 10 years old – will give birth to children of their own. “Forced labor and prostitution among underage migrants have more than tripled under [the current Administration].”<sup>14</sup> Today, desperate children will call hotlines, to report they are being abused, neglected, and trafficked.<sup>15</sup>

For at least a decade, the United States Department of Health and Human Services (HHS) has been responsible for the suffering of countless children.<sup>16</sup> This assessment is based solely on the information currently available;<sup>17</sup> however, it has been established that the unknown factors significantly outweigh what is known. This MUST change.

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<sup>1</sup> [Grassley Leads Bicameral Colleagues in Calling Out Abuses in the Biden-Harris Unaccompanied Migrant Children Program \(senate.gov\)](https://www.senate.gov/legislative/record/2021/01/20210120_01.htm)

<sup>2</sup> [Grassley Highlights Exploitation and Abuse of Migrant Children During Senate Roundtable](https://www.senate.gov/legislative/record/2021/01/20210120_01.htm)

<sup>3</sup> [Ibid](#)

<sup>4</sup> [Central American trafficker describes what happens to children at the hands of cartels \(youtube.com\)](https://www.youtube.com/watch?v=K3jK-28Rbva)

<sup>5</sup> [https://youtu.be/Mp9E5nkr-wQ?si=m1k\\_l3jK-28Rbva](https://youtu.be/Mp9E5nkr-wQ?si=m1k_l3jK-28Rbva)

<sup>6</sup> [RECORDS: HHS Sent Unaccompanied Minors to Sponsors with MS-13 Ties, Potential Trafficking Rings \(senate.gov\)](https://www.senate.gov/legislative/record/2021/01/20210120_01.htm)

<sup>7</sup> [CIGIE Statement on the Signing of the IG Empowerment Act.pdf \(ignet.gov\)](https://www.ignet.gov/record/2021/01/20210120_01.htm)

<sup>8</sup> [BILLS-114hr6450enr.pdf \(congress.gov\)](https://www.congress.gov/bills/114/hr/6450/enr/pdf)

<sup>9</sup> [Slaughterhouse series | NBC News](https://www.nbcnews.com/health/children/slaughterhouse-series-n1234567)

<sup>10</sup> [Children Risk Their Lives Building America's Roofs - The New York Times \(nytimes.com\)](https://www.nytimes.com/2021/01/20/us/politics/children-risk-their-lives-building-americas-roofs.html)

<sup>11</sup> [Finding The Feds' Missing Children | CHILD TRAFFICKING IN AMERICA \(muckraker.com\)](https://www.muckraker.com/finding-the-feds-missing-children/)

<sup>12</sup> [U.S. Department of Health & Human Services Whistleblower Reveals 'Tax Dollars' Spent to 'Put Migrant Children in the Hands of Criminals' | Project Veritas](https://www.projectveritas.org/2021/01/20/u-s-department-of-health-human-services-whistleblower-reveals-tax-dollars-spent-to-put-migrant-children-in-the-hands-of-criminals/)

<sup>13</sup> [Health Department released thousands of illegal immigrant kids with latent tuberculosis infections - Washington Times](https://www.washingtontimes.com/archive/health/2021/01/20/health-department-released-thousands-of-illegal-immigrant-kids-with-latent-tuberculosis-infections/)

<sup>14</sup> [Inside America's Fastest-Growing Criminal Enterprise: Sex Trafficking | The Free Press](https://www.freepress.com/inside-americas-fastest-growing-criminal-enterprise-sex-trafficking/)

<sup>15</sup> [Alone and Exploited - The New York Times \(nytimes.com\)](https://www.nytimes.com/2021/01/20/us/politics/alone-and-exploited.html)

<sup>16</sup> [Majority & Minority Staff Report - Protecting Unaccompanied Alien Children from Trafficking and Other Abuses 2016-01-282.pdf \(senate.gov\)](https://www.senate.gov/legislative/record/2021/01/20210120_01.htm)

<sup>17</sup> [21st SW Grand Jury Releases Shocking Report | My Florida Legal](https://www.myfloridalegal.com/21st-sw-grand-jury-releases-shocking-report/)

I'm confident we all agree that children should be protected and defended. HHS has failed at that mission. HHS has a 10-year demonstrated record<sup>18</sup> of losing children to sponsors who traffick, exploit, and harm children in unthinkable ways (see 2-Page Fact Sheet).

To be fair, HHS is not an investigative or law enforcement agency.<sup>19</sup> They simply do not have the knowledge, skills, ability, or tradecraft to protect children from traffickers. President-elect Donald Trump's nominee for HHS Secretary, Robert Kennedy, Jr., is aware of this crisis and his talented team is discussing solutions to end this crisis.

Child trafficking has evolved into an international syndicate of gangs<sup>20</sup> and cartels that is highly organized and very efficient. Smugglers and traffickers, during this Administration, have moved many of the more than 500,000 unaccompanied children that have flooded across the U.S. Southern border.<sup>21</sup> James O'Keefe's film "Line In The Sand" shows exactly how children are moved through a vast network of NGO's and delivered to sponsors.<sup>22</sup>

Sadly, due to the failed open border policies of the Biden-Harris Administration, we have delivered these unaccompanied children to criminals, traffickers and members of transnational criminal organizations<sup>23</sup> who are using the UC Program as a white glove delivery service of children. These criminal sponsors are defrauding the U.S. government by using the UC Program as the logistical chain of their child trafficking operation.<sup>24</sup>

In June of 2021, while serving at Pomona Fairplex Emergency Intake Site (EIS) as the Deputy to the Director of the Federal Case Management Team, I (and the Team) began reporting suspicious sponsor and suspected trafficking cases. In June of 2021, we thought less than 50 children were affected. After funneling more than 8,300 children through the EIS in less than 6-months, we knew thousands were affected. In February of 2023 we learned from Hannah Dreier at the NYT that 85,000 children were missing.<sup>25</sup>

Yet no action has been taken to rescue children. No action was taken to prevent other children from being lost in slave labor, commercial sex, organ harvesting, and other unspeakable evils.

Then, in July of 2024, we learned that the Biden-Harris Administration has lost track of more than 320,000 children.<sup>26 27 28</sup> HHS ignored warning signals, demonstrated they were unable to identify

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<sup>18</sup> [Overwhelmed federal officials released immigrant teens to traffickers in 2014 - The Washington Post](#)

<sup>19</sup> [carey-testimony.pdf \(house.gov\)](#)

<sup>20</sup> [Gangs and Human Trafficking | National Gang Center \(ojp.gov\)](#)

<sup>21</sup> [Scott, Grassley, and Bicameral Colleagues Call Out Abuses in the Biden-Harris Unaccompanied Migrant Children Program — U.S. Senator Tim Scott of South Carolina \(senate.gov\)](#)

<sup>22</sup> [Line in the Sand Movie](#)

<sup>23</sup> [\(460\) DHS Insider Blows Whistle on Int'l Child Sex Trafficking Gangs Exploiting 'Reasonable Fear' Loophole - YouTube](#)

<sup>24</sup> [rodas-testimony.pdf \(house.gov\)](#)

<sup>25</sup> [Alone and Exploited - The New York Times \(nytimes.com\)](#)

<sup>26</sup> [Biden-Harris admin loses track of 320,000 migrant children — with untold numbers at risk of sex trafficking and forced labor \(msn.com\)](#)

<sup>27</sup> [Management Alert- ICE Cannot Monitor All Unaccompanied Migrant Children Released from DHS and U.S. Department of Health and Human Services' Custody](#)

<sup>28</sup> <https://x.com/MJTruthUltra/status/1845201479818412334> [Bob Unanue, CEO of Goya Foods]

trafficking patterns and went so far as to establish a fundamentally flawed rule,<sup>29</sup> which demonstrated a clear inability to comprehend the emerging threat landscape, accurately identify trafficking patterns, and recognize critical indicators and warnings. Meanwhile, forced labor and prostitution among underage migrants has more than tripled.<sup>30</sup>

It's astonishing. How can this happen? It happens because HHS lacks oversight, transparency, and accountability.

HHS must commit to oversight, transparency, and accountability.

The UC Portal database is the official system of record for the UC Program. Currently, HHS denies direct access to the UC Portal data to law enforcement and others who could use it to identify trafficking activity, rescue exploited children and conduct critical oversight of the UC placement program.<sup>31</sup> But, there are simple data sharing and data analytics solutions<sup>32</sup> that will lead to the rescue of children, the prosecution of criminal sponsors & traffickers, and the dismantling of trafficking infrastructure.

Data from the UC Portal database needs to be examined by expert data analysts in the Inspector General (IG) Community. The IG Empowerment Act of 2016 granted IGs the ability to request and match datasets across federal agencies by exempting IGs from the Computer Matching Act.<sup>33</sup>

Children could be rescued, criminal sponsors and traffickers could be prosecuted, and trafficking networks could be dismantled if the IG had direct access to data in the UC Portal database and could match it with other data at agencies, not limited to but including, DHS and DOJ. It's unthinkable that HHS Secretary Becerra is withholding critical information regarding children and their sponsors, that could save the lives of children.<sup>34 35</sup>

It's devastating to know that after nearly 3 and a half years of sounding the alarm, no significant action has been taken to rescue children. According to oversight conducted by Senator Grassley, who has been a true champion for these endangered children for the last decade, HHS failed to fully comply even with subpoenas issued by DHS as it investigated evidence of child exploitation he referred to law enforcement earlier this year.<sup>36</sup> At least in part because of this obstruction, law enforcement was able to

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<sup>29</sup> [Grassley and Senate Republicans Demand Changes to Biden Admin Rule Endangering Safety and Wellbeing of Unaccompanied Alien Children](#)

<sup>30</sup> [Inside America's Fastest-Growing Criminal Enterprise: Sex Trafficking | The Free Press \(thefp.com\)](#)

<sup>31</sup> [Grassley Leads Bicameral Colleagues in Calling Out Abuses in the Biden-Harris Unaccompanied Migrant Children Program \(senate.gov\)](#)

<sup>32</sup> [Statement of Michael E. Horowitz, concerning "Overseeing the Overseers: Council of the Inspectors General on Integrity and Efficiency @ 10 Years" \(pandemicoversight.gov\)](#)

<sup>33</sup> [BILLS-114hr6450enr.pdf \(congress.gov\)](#)

<sup>34</sup> [April 17, 2024 - Attorney General Miyares Demands Biden Administration Address Missing Migrant Children Crisis \(state.va.us\)](#)

<sup>35</sup> [02-22-ia-ms-ut-dhs-fbi-auc-final.pdf \(scag.gov\)](#)

<sup>36</sup> [Grassley Alerts DHS, FBI to Evidence of Human Trafficking; Calls for Immediate Action to Locate & Rescue Migrant Children \(senate.gov\)](#)

find less than 4 percent of their targets (children and sponsors).<sup>37</sup> This must stop, and sharing of this data will help stop it.

In the new Administration, there are simple fixes that Border Czar Tom Homan, HHS Secretary Robert Kennedy, Jr., DHS Secretary Kristi Noem, Director of National Intelligence Tulsi Gabbard, and others can do to defend and protect children:

- implement simple safety measures to include but not limited to DNA testing
- implement stringent penalties, including but not limited to imprisonment for sponsors who are unable to account for a child's whereabouts
- hold release of all children until we rescue the missing children
- order HHS to share their data and comply with The IG Empowerment Act<sup>38 39</sup>
- elevate the activity of child trafficking on the National Intelligence Priorities Framework<sup>40</sup> (NIPF)
- designate child trafficking as a terrorist activity so that centers such as the National Counterterrorism Center<sup>41</sup> (NCTC), Terrorist Screening Center<sup>42</sup> (TSC), and National Targeting Center<sup>43</sup> (NTC) can provide manpower, tradecraft, and immediate implementation of targeting trafficking networks

In closing, I'm confident we all agree that children should be defended and protected. I'm eager to work with you to:

1. Rescue Children
2. Prosecute Traffickers and other Criminal "Sponsors"
3. Dismantle Trafficking Infrastructure

Thank you for your time and attention to the crisis of trafficked, exploited, and missing migrant children.

I'd be happy to answer any questions you may have.

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<sup>37</sup> [Grassley Leads Bicameral Colleagues in Calling Out Abuses in the Biden-Harris Unaccompanied Migrant Children Program \(senate.gov\)](#)

<sup>38</sup> [CIGIE Statement on the Signing of the IG Empowerment Act.pdf](#)

<sup>39</sup> [BILLS-114hr6450enr.pdf](#)

<sup>40</sup> [ICD\\_204\\_National\\_Intelligence\\_Priorities\\_Framework\\_U\\_FINAL-SIGNED.pdf](#)

<sup>41</sup> [NCTC Home](#)

<sup>42</sup> [Terrorist Screening Center — FBI](#)

<sup>43</sup> [CBP National Targeting Center | U.S. Customs and Border Protection](#)

## 2-Page Overview of Child Trafficking in HHS' Unaccompanied Children (UC) Program

### Summary

Smugglers and child traffickers are recruiting, harboring, and transporting children to the United States; using force, fraud, and coercion; for the purpose of involuntary servitude, debt bondage, slavery, commercial sex, and possibly forced organ harvesting. By exploiting flawed policies and deficiencies in the U.S. Department of Health and Human Services' (HHS) Administration for Children & Families (ACF) Office of Refugee Resettlement (ORR) Unaccompanied Children (UC) Program, a sophisticated network of smugglers and traffickers are using the U.S. Government as part of the logistical chain of their child trafficking operation. Although the causes of the recent surge of Unaccompanied Children (UCs) is debated, all stakeholders agree one reason migrant children make the perilous journey to the United States is they are "brought into the United States by human trafficking rings." (As per HHS' Fact Sheet).

### Documentation of a Dark Decade of Child Trafficking in HHS' UC Program

- 2014 newspaper article highlighting the failures of HHS to protect minors from trafficking: [Overwhelmed federal officials released immigrant teens to traffickers in 2014 - The Washington Post](#) )
- Senator Rob Portman's opening remarks at the 2016 congressional hearing on HHS placement of migrant children highlighting how HHS placed UCs in the hands of traffickers: [Portman's Opening Remarks-HHS Puts Children in the Hands of Traffickers](#)
- The 2016 Congressional report highlighting HHS' failure to protect children from trafficking: [Majority & Minority Staff Report - Protecting Unaccompanied Alien Children from Trafficking and Other Abuses 2016-01-282.pdf \(senate.gov\)](#)
- The FRONTLINE documentary "*Trafficked in America*" highlighting how teenagers from Central America were smuggled into the U.S. by traffickers who promised them jobs and a better life - only to force them to live and work in virtual slavery to pay off their debt. [Trafficked in America \(full documentary\) | FRONTLINE - YouTube](#)
- August 21, 2021 and October 21, 2021 interviews of DHS Whistleblower, Aaron Stevenson, who exposed how MS-13 and other Transnational Criminal Organizations are sponsoring children through the HHS UC Program.
  - [DHS Insider MS-13](#) (August 2021 interview in the shadows)
  - [DHS Insider Goes PUBLIC](#) (October 2021 on the record)
- U.S. probes trafficking of teen migrants in August of 2021 [Trafficking Teen Migrants for Poultry-Plant Work](#)
- August 2022 news article on HHS' child trafficking operation: [child-trafficking-operation-at-southern-border](#)
- August 2022 interview of Whistleblower from MVM (the contractor responsible for transporting UCs around the country in the middle of the night) highlighting how UCs are delivered to Sponsors the UCs don't know: <https://youtu.be/B2IU9FvIjtc>
- August 2022 interview with a Central American trafficker describing the horrifying realities Unaccompanied Children face in the US to include labor trafficking, sex trafficking, and forced organ harvesting: <https://youtu.be/ksJkZeHxk1s>
- November 29, 2022 press release and shocking video exposé (PART 1) on child trafficking by Project Veritas: [PV Child Pimped Out for Sex](#)
- November 30, 2022 shocking video exposé (PART 2) detailing how traffickers exploit illegal child labor with social security fraud; minor forced to pay back 'debt': [PV Traffickers Exploit Illegal Child Labor](#)
- January 19, 2023 video highlighting how at least 50 migrant children were found working graveyard shifts cleaning Midwest slaughterhouses: <https://youtu.be/7haUSHzBsrc>
- Feb 28, 2023 NYT article "*Alone and Exploited, Migrant Children Work Brutal Jobs Across the US*" exposing how migrant children are working and dying in the US. [NYT-Alone and Exploited](#)
- March 1, 2023 NBC report titled "Feds expand probe into migrant child labor in slaughterhouses" probing how children from Central America were brought to the US to work: <https://youtu.be/EjXgGIZISrM>
- March 6, 2023, Aaron Stevenson & Tara Rodas (aka "Double Trouble") on the Kyle Seraphin Show: [Double Trouble](#)
- March 29, 2023 3<sup>rd</sup> Presentment of the Florida Statewide Grand Jury: [FLGrandJuryPresentment-3-29-23](#)
- April 12, 2023 USDA letter to Members of the Meat and Poultry Industry warning them to crack down on illegal child labor. [Combating illegal child labor \(usda.gov\)](#)
- April 12, 2023 NBC news "A 16-year-old says he's still cleaning a Kansas slaughterhouse months after his employer was fined for employing kids" exposing Dept of Labor's inability to control illegal child labor. [16-Year-Old Slaughterhouse](#)
- April 12, 2023 War Journalist shows Rape Kits for migrants that are paid for with government money. [Michael\\_Yon-Rape Kits Given to Migrants](#)
- April 13, 2023 NBC news segment [identity-theft-linked-to-illegal-work-in-slaughterhouses](#)
- April 17, 2023 Letter from Florida AG Moody to Congress regarding HHS' & DHS' trafficking of UCs: [4-17-23 Letter AG Moody](#)
- April 17, 2023 NYT article, "*As Migrants Were Put to Work, US Ignored Warnings.*" [NYT-US Ignored Warnings](#)



- April 26, 2023: Testimony before the House Judiciary Subcommittee on Immigration Integrity, Security, and Enforcement will hold a hearing on "The Biden Border Crisis: Exploitation of Unaccompanied Alien Children,"
  - Link to Mrs. Rodas' Testimony: [Tara Lee Rodas Full Opening Statement](#)
  - Link to full Congressional hearing: <https://www.youtube.com/live/Ehul6b-t09M?feature=share>
- July, 26, 2023 interview of 2-time whistleblower, Carlos Arellano, on The Kyle Seraphin Show: <https://rumble.com/v32dld0-nyc-migrant-hotel-whistleblower-carlos-arellano-speaks-out.html>. This clip shows workers at the Row NYC complaining about safety concerns: <https://youtu.be/A88SHSGrHDU>
- October 2, 2023 Muckraker Twitter (X) undercover report "Federal Child Trafficking Pipeline Exposed." <https://rumble.com/v3mfhq7-federal-child-trafficking-pipeline-exposed-the-real-sound-of-freedom-muckra.html>
- October 16<sup>th</sup> promo for "Police State." Aaron Stevenson & Tara Rodas were featured together: [Twitter Promo-Police State](#)
- October 27<sup>th</sup> exposé by America's Future of 4 HHS Whistleblowers: [Where Did The Children Go? - Americasfuture.net](#)
- October 30, 2023, 4<sup>th</sup> Presentment of the Florida Grand Jury [Florida-4th-Presentment-of-the-21st-Statewide-Grand-Jury](#)
- Nov 3<sup>rd</sup> Press Release & Call to Action by America's Future on HHS' proposed rule change that would make trafficking of the children more easy: [Press Release: America's Future Issues Call To Action: Oppose HHS's Proposed Rule](#)
- November 29, 2023 Aaron & Tara on the Kyle Seraphin Show Opposing HHS' Proposed Rule Change: [Kyle Aaron Tara](#)
- December 18, 2023 MSNBC exposé titled "Slaughterhouse Children." [Slaughterhouse Children: Child Labor Exposed](#)
- December 28, 2023 article by Hannah Dreier of the NYT: [https://www.nytimes.com/interactive/2023/12/28/us/migrants-children-data.html?unlocked\\_article\\_code=1.K00.TtLo.xM2tex0SU\\_Cv&smid=url-share](https://www.nytimes.com/interactive/2023/12/28/us/migrants-children-data.html?unlocked_article_code=1.K00.TtLo.xM2tex0SU_Cv&smid=url-share)
- August 8, 2024 article in NY Post: [Biden-Harris admin loses track of 320,000 migrant children \(nypost.com\)](#)
- August 19, 2024 DHS OIG Report: [Management Alert- ICE Cannot Monitor All Unaccompanied Migrant Children Released from DHS and U.S. Department of Health and Human Services' Custody](#)
- September 25, 2024 exposé: [Finding The Feds' Missing Children | CHILD TRAFFICKING IN AMERICA \(muckraker.com\)](#)
- October 14, 2024 expose in the Free Press: [Inside America's Fastest-Growing Criminal Enterprise: Sex Trafficking | The Free Press \(thefp.com\)](#)

A sampling of the evidence above shows that HHS has lost control of the UC Program. Immediate steps must be taken to safeguard vulnerable, migrant children who come into the custody of HHS. It is unacceptable for a federal government agency to place children in the hands of unvetted and unsafe "sponsors" who are criminals, traffickers, and members of Transnational Criminal Organizations (TCOs). HHS is distributing migrant children across the country (though a sophisticated delivery network), bypassing state authorities in a secretive manner with limited transparency and inadequate oversight. This lack of openness, consent, and coordination is unacceptable and is contributing to the abuse, neglect, sexual exploitation, and trafficking of migrant children.

### Congressional Action

1. **12/5/22:** Letter from three U.S. Senators to the U.S. Senate Committee on Homeland Security and Governmental Affairs requesting a hearing to investigate Mrs. Rodas' claims: [79E2D68B-E48E-4FC2-8A52-879041840686 \(senate.gov\)](#)
2. **12/5/22:** Letter from five U.S. Senators to HHS Secretary Becerra requesting a response to Mrs. Rodas' allegations: [BEEFDA90-4130-4BAF-BBAA-8F5080C35930 \(senate.gov\)](#)
3. **4/26/23:** House Judiciary Subcommittee on Immigration Integrity, Security, and Enforcement hearing "The Biden Border Crisis: Exploitation of Unaccompanied Alien Children," (1) [Tara Lee Rodas Full Opening Statement](#) (2) Full Congressional hearing: <https://www.youtube.com/live/Ehul6b-t09M?feature=share>
4. **9/12/2023:** Press conference outside the U.S. Capitol, Rep. Smith announced new legislation called the "Safeguarding Endangered Children, Unaccompanied and at Risk of Exploitation Act of 2023" aka the "SECURE Act of 2023." [Ex-DHS agent who inspired 'Sound of Freedom,' GOP rep demand Biden admin find 85K 'missing' migrant kids | Fox News](#)
5. **9/13/2023:** Testimony before the Committee on Homeland Security: [An Unbearable Price: The Devastating Human Costs of the Biden-Mayorkas Border Crisis – Committee on Homeland Security \(house.gov\)](#)
6. **9/14/2023:** Testimony before the House Foreign Affairs Subcommittee on Global Health, Global Human Rights and International Organizations: [Children are not for Sale](#)
7. **12/4/2023:** Press Release from Senator Grassley's office opposing HHS's Proposed Rule Change: [Grassley and Senate Republicans Demand Changes to Biden Admin Rule Endangering Safety and Wellbeing of Unaccompanied Alien Children](#)
8. **1/22/2024:** Press Release from House Judiciary Committee: [Chairman Jordan Subpoenas HHS Secretary Becerra for Information on Criminal- and Gang-Affiliated UACs, Placement of UACs | House Judiciary Committee Republicans](#)
9. **1/24/2024:** Press Release from Senator Grassley: [Grassley Alerts DHS, FBI to Evidence of Human Trafficking](#)

# Data Fidelity, Data Fusion, Data Distribution

## A PACE-Like Solution to Combat Child Trafficking

*by Aaron Stevenson (former DHS intel) and Tara Rodas (former HHS detailee)*

### Key Takeaways

- A PACE-like entity can centralize and fuse data across DHS, DOJ, HHS, and other agencies to uncover patterns in child trafficking networks that isolated systems cannot detect. This will create the ability to both (1) rescue children and (2) prevent other children from being lost in slave labor, commercial sex, organ harvesting, or other activities.
- By streamlining the flow of intelligence through watchlist packages, the PACE-like system enables real-time collaboration between federal, state, and local law enforcement to respond swiftly to trafficking threats.
- Integrating contractor and NGO performance data allows a PACE-like model to proactively identify fraud, waste, and abuse, enhancing accountability and safeguarding resources intended for vulnerable children.

Just as the PRAC's PACE offered a solution to pandemic-related oversight challenges, a similar approach can be applied to address the trafficking of Unaccompanied Children, where the need for coordinated data analysis and integration across agencies is critical.

The solution to the trafficking crisis of Unaccompanied Children (UC) shares significant parallels with the challenges faced during the pandemic response, particularly in terms of **resource distribution** and **oversight**. During the pandemic, multiple government agencies struggled to track and account for large-scale disbursements of relief funds, due to disjointed systems and lack of coordination.

The Pandemic Analytics Center of Excellence (PACE) at the Pandemic Response Accountability Committee (PRAC) – using the best practices from the former Recovery Accountability and Transparency (RAT) Board's Recovery Operations Center (ROC), which supported OIGs in oversight of the American Recovery and Reinvestment Act of 2009 - emerged as an effective solution to these problems, empowering oversight through the consolidation of data from different agencies. The PACE utilized advanced data analytics to detect fraud, waste, and abuse, identifying patterns that individual departments or contractors alone could not.

A PACE-like entity operating under the framework of the Council of the Inspectors General on Integrity and Efficiency (CIGIE) could be critical in addressing the growing issue of child

trafficking by harmonizing the efforts of different agencies involved. Such an entity would play a vital role in fusing information from various government departments, identifying trafficked children and sponsors, and pushing vital intelligence to law enforcement at all levels.

## Data Integration for Identifying Trafficked Children and Sponsors

The Department of Homeland Security (DHS) and the Department of Health and Human Services (HHS) currently manage the process for handling Unaccompanied Children who cross the border. The children are initially apprehended by Border Patrol (BP) and/or Customs and Border Protection (CBP) under DHS, held for up to three days, and then transferred to HHS custody. HHS is responsible for placing these children with sponsors, often relying on contractors to manage case files and perform the necessary due diligence.

However, existing challenges are threefold:

- HHS lacks access to critical datasets from other agencies like DHS, the Department of Justice (DOJ), and state or local law enforcement databases
- HHS lack tradecraft and ability to identify trafficking patterns
- DOJ/DHS/non-federal law enforcement have demonstrated an inability to accurately and timely find trafficked children
- HHS remains an unresponsive entity to adhere to subpoenas

This fragmentation creates gaps which traffickers have operated freely.

A PACE-like entity could solve this by centralizing access to these disparate datasets, creating a comprehensive, real-time database that includes immigration data (DHS and layered through numerous compartments), criminal records and unclassified intelligence information of transnational criminal organizations (DOJ), sponsor verification data (HHS), and more. By aggregating data from across these federal departments and integrating it, this entity would enable the capabilities to quickly, efficiently, and thoroughly identify the children and sponsors for accountability and if necessary, recovery operations. This entity could identify patterns and anomalies in the sponsor system that suggests trafficking activity, such as (but not limited to):

- Multiple children placed with a single sponsor
  - o A pattern commonly associated with trafficking networks
- Sponsors with criminal records or known ties to human trafficking
  - o Data integration could flag potential traffickers that might have otherwise been missed in isolated departmental checks
- Frequent movement between states or sudden transfers of sponsorship

- Another red flag that could indicate trafficking networks shuffling children to avoid detection

By merging all this information, the PACE-like entity would create a comprehensive and constantly updated footprint of child placements, ensuring that trafficked children and fraudulent sponsors are more quickly and accurately identified.

Once the PACE-like entity successfully identifies suspicious patterns and trafficked individuals, the next vital step is to ensure that this intelligence is swiftly communicated to the appropriate law enforcement agencies for action.

## Data Sharing and Law Enforcement Collaboration

Once the PACE-like entity identifies suspicious patterns or confirmed cases of trafficking, it must act quickly to distribute this information to law enforcement agencies. A key function of this model would be the creation and dissemination of “watchlist packages” (CBP conducts transnational organized crime [TOC] watchlisting) for federal, state, and local law enforcement. This would mirror the pandemic-era data-sharing approach, where federal agencies used tools like the PACE to push important fraud data to local levels.

In practice, this would work as follows:

- Watchlist Packages
  - Whenever the PACE-like entity identifies a suspicious sponsor or trafficking network, it can automatically generate a detailed watchlist package, which includes all relevant data (criminal history, sponsor records, movement patterns, etc.) and flags the individual or group for immediate investigation.
- Interagency Data Flow
  - These packages could be pushed to agencies ranging from Immigration and Customs Enforcement (ICE) to state and local police, who would be equipped with the necessary intelligence to track down traffickers or intervene before children disappear into exploitative networks.
- Real-Time Alerts
  - Law enforcement could be alerted in real-time to emerging threats or anomalies. This allows immediate action on suspicious sponsor applications or child transfers, improving response times and potentially preventing trafficking incidents.

This systematic flow of information would allow federal, state, and local agencies to operate cohesively in targeting traffickers. The ability to access unified data from multiple

agencies and quickly disseminate it to law enforcement will ensure that critical information doesn't slip through bureaucratic gaps, as it often does in the current system.

While timely information sharing with law enforcement is crucial for addressing immediate threats, the PACE-like entity's role extends further—identifying and mitigating fraud, waste, and abuse in the broader system, especially within NGOs and contractors tasked with handling these vulnerable children.

## Detecting Fraud, Waste, and Abuse in NGOs and Contractors

Much like how PACE was instrumental in identifying fraudulent contractors and bad actors during the pandemic, a PACE-like entity overseeing child trafficking could identify cases of fraud, waste, and abuse among the non-governmental organizations (NGOs) and contractors tasked with managing the care and placement of children. Currently, these organizations operate under HHS and often rely on case workers, some of whom are volunteers or contractors, to verify sponsor information and manage child cases.

The complexity of these contracts—ranging from case management to transportation and service delivery—presents ample opportunity for exploitation, especially if oversight is weak. A PACE-like model can apply the same pattern analysis and fraud detection techniques used to uncover financial fraud during the pandemic to track misuse of government resources in this context, which would include (but not limited to):

- Analyzing Contractor Performance
  - o By integrating contract and case management data, this entity could identify patterns of underperformance or fraud by NGOs and contractors, such as mismanagement of cases, improper screening of sponsors, or the misallocation of funds intended for child services.
- Spotting Fraudulent Activity
  - o The PACE-like entity could also identify contractors or NGOs with unusually high rates of sponsor placements that later turn out to be fraudulent, suggesting complicit behavior or negligence in vetting. Using a combination of contract data, payment information, and case outcomes, this entity could flag bad actors and push that information back to HHS for contract termination or legal action.
- Reducing Waste
  - o By automating the analysis of contracts and service delivery outcomes, this entity could also help reduce waste and improve the efficiency of the system, ensuring that funds allocated for the care of Unaccompanied Children are spent effectively and not lost to inefficiency or corruption.

By tackling these systemic inefficiencies and potential abuses, the PACE-like entity ensures a more transparent and accountable framework, setting the stage for a comprehensive solution to combat child trafficking and better protect unaccompanied minors.

## Lasting Impact

In addition to its primary role of identifying trafficked children and fraudulent sponsors, the PACE-like entity would play a crucial role in shaping and informing border policies to prevent trafficking before it occurs. By analyzing large datasets and detecting patterns of exploitation, this entity can provide key insights and recommendations that drive the creation of best practices at the border.

One significant policy enhancement that could be supported by this entity is the implementation of mandatory DNA testing for individuals claiming to be relatives of unaccompanied minors. Currently, sponsors can sometimes falsely claim familial ties, which traffickers exploit to gain custody of children. Mandatory DNA testing would help confirm familial relationships, drastically reducing fraudulent claims. By analyzing data from such tests in combination with other records, the PACE-like entity would be able to monitor trends and continuously refine screening processes to make them more effective.

Additionally, this entity could guide data collection efforts at the border, recommending the capture of biometric data (e.g., fingerprints, facial recognition) and cross-referencing it with criminal records and watchlists from DOJ and DHS databases. This integration of data collection practices would ensure that individuals attempting to exploit or traffic children are flagged before they can enter the system.

Through its insights, this entity could advocate for other key policy recommendations, such as (but not limited to)

- Continuous vetting procedures for sponsors, which include background checks across multiple agency databases.
- Continuous monitoring of sponsor-child relationships post-placement, to identify any red flags of trafficking or abuse.
- Inter-agency collaboration protocols, ensuring that border officials, case workers, and law enforcement agencies follow consistent and thorough screening methods to prevent trafficking.

By continuously refining these practices based on emerging trafficking patterns, the PACE-like entity would not only respond to trafficking incidents but also prevent future cases by shaping more robust, data-driven policies at the border.

## Conclusion

The creation of a PACE-like entity under CIGIE could significantly enhance the ability to combat child trafficking by centralizing and analyzing data from across government departments, identifying trafficked children and fraudulent sponsors, and pushing critical intelligence to law enforcement. The integration of datasets from DHS, DOJ, HHS, and other sources would allow for a more holistic view of trafficking networks and improve the identification of fraud, waste, and abuse within the system. By providing law enforcement with real-time, actionable intelligence and rooting out bad actors among NGOs and contractors, this approach could help protect vulnerable children and bring traffickers to justice.

## Systems of Data

- HHS
- DHS
- DOJ
- And other various agencies