



# Referrals from Nongovernmental Organizations

Annual Report, Fiscal Year 2023

*March 22, 2024*

Fiscal Year 2023 Report to Congress



**Homeland  
Security**

*U.S. Immigration and Customs Enforcement*

# Message from the Deputy Director and Senior Official Performing the Duties of the Director

March 22, 2024

I am pleased to present the “Referrals from Nongovernmental Organizations” report for Fiscal Year (FY) 2023, prepared by U.S. Immigration and Customs Enforcement (ICE).

This report was compiled pursuant to direction in House Report 117-396 and the Joint Explanatory Statement accompanying the FY 2023 Department of Homeland Security (DHS) Appropriations Act (P.L. 117-328).

Pursuant to congressional guidelines, this report is being provided to the following Members of Congress:

The Honorable David Joyce  
Chairman, House Appropriations Subcommittee on Homeland Security

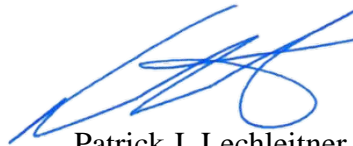
The Honorable Henry Cuellar  
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Chris Murphy  
Chair, Senate Appropriations Subcommittee on Homeland Security

The Honorable Katie Britt  
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

Inquiries related to this report may be directed to the ICE Office of Congressional Relations at (202) 732-4200.

Sincerely,



Patrick J. Lechleitner  
Deputy Director and  
Senior Official Performing the Duties of the Director  
U.S. Immigration and Customs Enforcement



# Executive Summary

The Joint Explanatory Statement accompanying the FY 2023 DHS Appropriations Act (P.L. 117-328) directs ICE to consider enrollment referrals from nongovernmental organizations (NGOs) and community partners actively implementing ICE's Alternatives to Detention (ATD) Intensive Supervision Appearance Program (ISAP) which utilizes case management. ICE is directed further, in consultation with relevant NGOs and local community partners, at ICE's discretion, to establish criteria for such referrals, guidelines for submission, and criteria for how ICE considers referrals for enrollment in ATD – ISAP. This report outlines ICE compliance for FY 2023 with congressional guidelines regarding enrollment referrals from NGOs and community partners actively implementing ICE's ATD programs that utilize case management. After analyzing several years' worth of data of participant service utilization and outcomes, ICE will reassess its use of wraparound stabilization services. ICE will explore referral resources and other opportunities that both illustrate a significant benefit and do not incur costs to the Government.



# Referrals from Nongovernmental Organizations Fiscal Year 2023

## Table of Contents

I.	Legislative Requirement .....	1
II.	Background .....	2
	Wraparound Stabilization Services .....	3
III.	Results/Data Report .....	4
	A. Current Providers .....	4
	B. Referral Increase .....	9
	C. Participation .....	11
IV.	Analysis/Discussion .....	17
V.	Conclusion .....	18
	Appendix: Abbreviations .....	19

# I. Legislative Requirement

This report responds to the direction set forth in the House Report 117-396 and in the Joint Explanatory Statement accompanying the Fiscal Year (FY) 2023 Department of Homeland Security (DHS) Appropriations Act (P.L. 117-328).

The Joint Explanatory Statement states:

*ATD Referrals.*—ICE shall consider enrollment referrals from NGOs and community partners that are actively implementing ICE’s ATD programs that utilize case management. ICE shall establish, with the consultation of relevant NGO and local community partners, at ICE’s discretion, criteria for such referrals, guidelines for submission, and criteria for how ICE will consider any such referrals for enrollment in ATD – ISAP. ICE shall submit a report to the Committees on progress regarding these guidelines within 60 days of the date of enactment of this Act and quarterly thereafter until the guidelines are finalized. ICE shall submit an annual report on the number of NGO referrals that are submitted, and the number of such referrals accepted into ATD programs that utilize case management programs.

House Report 117-396 states:

*ATD Referrals.*—ICE shall continue to submit quarterly reports to the Committee until the ATD referrals guidelines are finalized.

## II. Background

Alternatives to Detention (ATD) Intensive Supervision Appearance Program (ISAP) is a monitoring program used by U.S. Immigration and Customs Enforcement (ICE) to ensure compliance with release conditions and to provide important case management services for non-detained noncitizens. ATD – ISAP allows noncitizens to remain in their community—contributing to their families and community organizations and, if necessary, concluding their affairs in the United States—as they move through immigration proceedings or prepare for departure.

ATD – ISAP may be appropriate for a noncitizen released pursuant to an Order of Release on Recognizance, an Order of Supervision, a grant of parole, or a bond stipulating ATD – ISAP as an additional release condition. To be eligible for ATD – ISAP, participants must be at least 18 years of age, must be removable from the United States, and must be either pending or actively involved in formal immigration removal proceedings or subject to a final order of removal.

ATD – ISAP is currently available in more than 260 locations nationwide for eligible participants residing within any of ICE Enforcement and Removal Operations' (ERO) 25 areas of responsibility (AOR). ATD – ISAP allows ICE to monitor a portion of non-detained cases more closely. The level of supervision and technology to which an ATD – ISAP participant is assigned based upon criteria including current immigration status, criminal history, compliance history, community or family ties, status as a caregiver or provider, and other humanitarian or medical conditions.

ATD – ISAP is carried out with support of a government contractor, currently BI Incorporated (BI), which supervises participants through a combination of home visits, office visits, alert response, court tracking, and technology. ISAP is the name of the contract under which BI operates and is currently in its fourth iteration (ATD – ISAP IV). With ATD – ISAP IV, ERO ATD officers have discretion to determine the frequency of home and office visits, types of technology used (telephonic, global positioning system, or SmartLink), and court and alert management used. Case management levels and technology assignments are reviewed and adjusted by ATD officers at any time depending upon changes in a participant's circumstances and compliance. BI case specialists (CS) provide case management for program participants and assess and determine appropriate referrals for program participants to facilitate community stabilization.

While ATD – ISAP IV provides a substantial amount of case management services, significant participant needs cannot be fulfilled through the means of traditional case management.<sup>1</sup> To ensure participants have access to these services, BI subcontracts with nongovernmental organizations (NGO) to fulfill these needs and to help with participant stabilization. These

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<sup>1</sup> Under ATD – ISAP IV, the contractor refers participants to local resources based upon the participant's individual needs. Service referrals under ATD – ISAP IV include, but are not limited to, assistance with school enrollments, medical care as needed (vaccinations, referrals for emergent care centers, etc.), food assistance, clothing assistance, and immigration attorney referrals using the approved Department of Justice list of low- to no-cost attorneys.

functions are known as wraparound stabilization services (WSS), which are a subset of services provided in the ISAP – IV contract.

## Wraparound Stabilization Services

### 1. Criteria

WSS are designed for vulnerable populations<sup>2</sup> that would benefit from additional stabilization services.<sup>3</sup> WSS are available at contractor sites, to include 202 locations covering all AORs, and all services are voluntary. WSS screenings for possible need for additional services and education groups are offered to all participants receiving case management support by the ATD – ISAP IV vendor. Currently, ERO refers ATD participants for a Supplemental Services Evaluation (SSE) to NGOs through the ATD – ISAP IV contract. The NGO conducts the SSE and recommends if services are needed based on its assessment. If the NGO is recommending services, the NGO submits a Plan of Care/Treatment Plan for the ATD participant to ERO for services through the ATD – ISAP IV contractor. ERO reviews the Plan of Care/Treatment Plan submitted by the NGO and either approves or disapproves the service based on program criteria.

### 2. Challenges

Since ICE first implemented WSS as a contract modification to the ATD – ISAP III contract, several challenges prevented both higher referrals for WSS and further engagement in service offerings for participants. The most significant factor affecting the volume of referrals is the NGO community's lack of the resources necessary to handle all potential referrals. While NGOs continue to expand with more locations and more hiring, they are only able to handle a fraction of new participants assigned to ATD – ISAP IV. Other challenges include a cumbersome identification and referral process. A substantial increase in program participants, without a proportional increase in resources to manage the population, makes it increasingly challenging to identify and refer participants for appropriate evaluation and services. To ensure all new participants are given an appropriate evaluation for supplemental services, ICE Headquarters–ATD – ISAP has developed guidance to refer all new participants automatically for an evaluation instead of waiting for the CS to identify a need.

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<sup>2</sup> Examples of vulnerable populations include, but are not limited to, victims of human trafficking, victims of significant or violent crimes, and those suffering from post-traumatic stress disorder.

<sup>3</sup> Services provided directly through WSS include trauma-informed education and care, human trafficking screenings, trafficking group educations, family and individual therapy and rehabilitation, supplemental services evaluation, parenting education sessions, child abuse prevention orientation, and repatriation support services as needed based on an individual needs assessment.

### III. Results/Data Report

#### A. Current Providers

WSS functions are provided in the following locations, during FY 2023, as of September 30, 2023:

<b>WSS Provider</b>	<b>Locations</b>	<b>Location Count</b>
<b>A Quarter Blue</b>	Los Angeles	3
	Santa Ana	
	Ventura	
<b>Abraxas</b>	Chicago	6
	Cincinnati	
	Cleveland	
	King Of Prussia	
	Philadelphia	
	York	
<b>Bethany Christian Services</b>	Atlanta	65
	Bakersfield	
	Birmingham	
	Boise	
	Boston	
	Charleston	
	Charlotte	
	Chicago	
	Cincinnati	
	Cleveland	
	Dallas	
	Delray	
	Denver	
	Dover	
	El Paso	
	Fort Myers	
	Framingham	
	Frederick	
	Fresno	
	Ft Lauderdale	
Grand Rapids		
Hartford		



WSS Provider	Locations	Location Count
	Indianapolis	
	Jacksonville	
	Kansas City	
	King Of Prussia	
	Los Angeles	
	Marlton	
	Memphis	
	Miami	
	Montgomery	
	Nashville	
	New Brunswick	
	New Orleans	
	Newark	
	Norcross	
	Norfolk	
	NY Bronx	
	NY Long Island	
	NY Manhattan	
	NY Queens	
	Ogden	
	Orlando	
	Philadelphia	
	Pittsburgh	
	Portland OR	
	Providence	
	Richmond	
	Sacramento	
	Salisbury	
	Salt Lake City	
	San Antonio	
	San Bernardino	
	San Diego	
	San Francisco	
	San Jose	
	Santa Ana	
	Seattle	
	South Houston	
	St Paul	
	Stockton	

WSS Provider	Locations	Location Count
	Stuart	
	Tampa	
	Washington DC	
	York	
<b>Center For Family Services</b>	New Brunswick	2
	Newark	
<b>Centro Multicultural La Familia</b>	Detroit	1
<b>Endeavors</b>	Atlanta	64
	Bakersfield	
	Birmingham	
	Boston	
	Charleston	
	Charlotte	
	Chicago	
	Cincinnati	
	Cleveland	
	Dallas	
	Delray	
	Denver	
	Detroit	
	El Paso	
	Fort Myers	
	Frederick	
	Fresno	
	Gadsden	
	Grand Rapids	
	Harlingen	
	Hartford	
	Houston	
	Indianapolis	
	Jacksonville	
Kansas City		
Las Vegas		
Los Angeles		
Manassas		
Marlton		
Memphis		
Miami		
Nashville		

WSS Provider	Locations	Location Count
	New Brunswick	
	New Orleans	
	Newark	
	Norcross	
	Norfolk	
	NY Bronx	
	NY Long Island	
	NY Manhattan	
	NY Queens	
	Omaha	
	Orlando	
	Phoenix	
	Pittsburgh	
	Providence	
	Provo	
	Richmond	
	Sacramento	
	Salisbury	
	Salt Lake City	
	San Antonio	
	San Bernardino	
	San Diego	
	San Francisco	
	Santa Ana	
	Seattle	
	Silver Spring	
	South Houston	
	St Paul	
	Stockton	
	Tampa	
	Ventura	
	Washington DC	
<b>Family Success</b>	Birmingham	7
	Gadsden	
	Jackson	
	Little Rock	
	Memphis	
	Nashville	
	St Louis	

<b>WSS Provider</b>	<b>Locations</b>	<b>Location Count</b>
<b>Golden State</b>	Bakersfield	2
	Fresno	
<b>International Institute of Los Angeles</b>	Los Angeles	3
	San Bernardino	
	Santa Ana	
<b>Lutheran Social Services</b>	Atlanta	16
	Baltimore	
	Detroit	
	Fort Myers	
	Grand Rapids	
	Los Angeles	
	Manassas	
	Midland	
	Newark	
	Norfolk	
	Omaha	
	Richmond	
	Salisbury	
	Salt Lake City	
Silver Spring		
Washington DC		
<b>North Star Family Center</b>	Bakersfield	14
	Chicago	
	Fort Myers	
	Fresno	
	Marlton	
	New Brunswick	
	NY Long Island	
	Phoenix	
	Sacramento	
	San Bernardino	
	San Diego	
	San Jose	
	Santa Maria	
Stockton		
<b>Project Help</b>	Fort Myers	1
<b>Ser Familia</b>	Atlanta	1
<b>Stars Behavioral Health Group</b>	Los Angeles	2
	Santa Ana	

<b>WSS Provider</b>	<b>Locations</b>	<b>Location Count</b>
<b>Survivors' Pathway</b>	Ft Lauderdale	5
	Jacksonville	
	Miami	
	Tallahassee	
	Tampa	
<b>Trauma Resolution Center</b>	Miami	1
<b>US. Conference of Catholic Bishops</b>	Houston	9
	Los Angeles	
	Louisville	
	Miami	
	Newark	
	Salt Lake City	
	San Antonio	
	San Diego	
	South Houston	
<b>Total</b>		<b>202</b>

**B. Referral Increase**

FY 2023 has seen 27 new NGO offices who are able to provide WSS. Additionally, the vast majority of referring offices met or exceeded the number of referrals that were made in FY 2022.

<b>Office Totals by Fiscal Year<sup>4</sup></b>					
<b>Office</b>	<b>FY 2020</b>	<b>FY 2021</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>Total</b>
Atlanta	89	635	1,257	1,413	3,394
Bakersfield	-	852	169	1,114	2,135
Baltimore	33	191	337	306	867
Birmingham	-	5	334	655	994
Boise	-	-	-	1	1
Boston	30	286	314	580	1,210
Charleston	-	282	428	433	1,143
Charlotte	-	234	381	309	924
Chicago	-	384	946	2,006	3,336
Cincinnati	-	-	-	54	54
Cleveland	-	-	-	129	129
Dallas	-	233	331	398	962
Delray	16	510	1,144	816	2,486
Denver	-	-	485	1,739	2,224
Detroit	-	12	350	470	832

<sup>4</sup> WSS began February 2020. The numbers were reported by BI on September 30, 2023.

<b>Office Totals by Fiscal Year<sup>4</sup></b>					
<b>Office</b>	<b>FY 2020</b>	<b>FY 2021</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>Total</b>
Dover	-	215	367	485	1,067
El Paso	-	100	324	206	630
Fort Myers	-	45	574	759	1,378
Framingham	-	-	-	62	62
Frederick	-	-	1	385	386
Fresno	-	363	1,597	1,479	3,439
Ft Lauderdale	-	-	-	287	287
Gadsden	-	294	242	258	794
Grand Rapids	114	130	314	19	577
Harlingen	-	-	56	107	163
Hartford	23	226	491	897	1,637
Houston	48	179	572	482	1,281
Indianapolis	-	37	699	482	1,218
Jackson	-	-	-	32	32
Jacksonville	-	-	-	104	104
Kansas City	-	-	-	2	2
King Of Prussia	-	-	-	385	385
Las Vegas	-	-	-	1	1
Little Rock	-	-	-	15	15
Los Angeles	68	716	5,047	2,290	8,121
Louisville	2	89	-	12	103
Manassas	38	415	225	313	991
Marlton	36	104	337	725	1,202
Memphis	-	-	-	5	5
Miami	116	2,185	1,624	1,404	5,329
Midland	-	-	-	47	47
Montgomery	-	-	-	64	64
Nashville	-	-	-	292	292
New Brunswick	-	-	-	194	194
New Orleans	-	-	184	545	729
Newark	46	155	815	1,011	2,027
Norcross	-	-	-	249	249
Norfolk	-	-	26	1	27
NY Bronx	-	192	808	872	1,872
NY Long Island	-	-	-	666	666
NY Manhattan	-	139	567	520	1,226
NY Queens	-	219	1,124	1,392	2,735
Ogden	-	-	-	2	2
Omaha	112	320	770	825	2,027
Orlando	14	347	591	519	1,471
Philadelphia	44	301	700	1,012	2,057

Office Totals by Fiscal Year <sup>4</sup>					
Office	FY 2020	FY 2021	FY 2022	FY 2023	Total
Phoenix	-	-	442	693	1,135
Pittsburgh	-	-	53	321	374
Portland OR	-	-	-	1	1
Providence	-	38	72	35	145
Provo	-	43	49	44	136
Richmond	-	247	1,288	970	2,505
Sacramento	-	-	465	412	877
Salisbury	-	31	89	269	389
Salt Lake City	7	296	458	361	1,122
San Antonio	16	241	307	620	1,184
San Bernardino	-	132	464	1,026	1,622
San Diego	-	109	17	435	561
San Francisco	-	95	276	178	549
San Jose	-	-	-	30	30
Santa Ana	1	150	449	1,310	1,910
Santa Maria	-	-	125	428	553
Seattle	-	-	504	524	1,028
Silver Spring	49	285	486	666	1,486
South Houston	20	240	514	471	1,245
St Louis	-	-	-	5	5
St Paul	-	-	-	3	3
Stockton	-	-	-	495	495
Stuart	-	-	-	1	1
Tallahassee	-	-	-	2	2
Tampa	-	-	633	1,009	1,642
Ventura	-	271	207	502	980
Washington DC	29	438	397	712	1,576
York	-	-	84	556	640
<b>Total<sup>5</sup></b>	<b>951</b>	<b>13,011</b>	<b>31,910</b>	<b>41,909</b>	<b>87,781</b>

## C. Participation

Participation in WSS was historically initiated by a participant’s BI CS, who identified any needs or concerns that could not be addressed through traditional ATD – ISAP IV capabilities. Upon identification of need(s), the CS submitted a recommendation for a Mental Health Screening and

<sup>5</sup> The ATD – ISAP TotalAccess is a “living” database; as such, the totals are subject to change in instances such as system updates or necessary historical data modifications completed for accuracy purposes. All data in this report are as of September 30, 2023.

Evaluation (MHSE)/Supplemental Services Evaluation (SSE)<sup>6</sup> to the ATD – ISAP monitoring officers (AMOs, who are federal employees) with the oversight of the Section Chief for review and approval of the request. The receiving AMO reviewed for applicable recommendations for services as defined by the contract as well as for case accuracy and progress before endorsing a treatment plan. Upon approval, the CS coordinated the initial MHSE/SSE with the appropriate local NGO. After evaluating a participant, the NGO provides the recommendation(s) for services under WSS to the CS, who subsequently requested approval for the services. The CS sent the recommendation to the Extended Case Management Services AMO for review and approval/denial. Upon approval, the CS performed all coordination with the appropriate NGO(s) for the services provided.

ICE streamlined the above process to respond to a significant increase of individuals and families crossing the Southern Border and to ensure services are provided as quickly as possible. Specifically, ICE completed a contract modification to ensure all participants who are enrolled into a C-site<sup>7</sup> or a G-site<sup>8</sup> automatically are provided with the MHSE/SSE referral.

As of September 30, 2023, a total of 60,397 unique individuals were referred to WSS and 87,781 total WSS referrals were made. Approximately 36.6 percent of individual participants referred for any WSS used at least one service. Participants in WSS are often referred to more than one service, meaning a single individual may be counted twice or more in the count of total referrals. For example, an individual who initially attends an SSE may be referred later to both Individual and Family Therapy.

The following table and graph show the number of utilized and not-utilized<sup>9</sup> referrals<sup>10</sup> by year and month since February 2020:

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<sup>6</sup> The SSE includes an assessment by the NGO/service provider who will decide if mental health services are needed, and if so, develop individualized treatment plans for the participant. Services provided directly through WSS include trauma-informed education and care, human trafficking screenings, trafficking group educations, family and individual therapy and rehabilitation, supplemental services evaluation, parenting education sessions, child abuse prevention orientation, and repatriation support services as necessitated based on an individual needs assessment.

<sup>7</sup> C-Sites are standalone facilities operated by the contractor to monitor participants selected for the ATD program. C-Site participants are assigned to a contractor CS who performs case management, including home and office visits.

<sup>8</sup> G-Sites are locations where the contractor works within the local ERO office. G-Sites are limited to a capacity of 250 participants, with two CSs who perform the same functions of a C-Site CS.

<sup>9</sup> Referrals are the number of recommendations for services by the NGOs followed by the number of service approvals by ICE and utilized denotes the number of times the participant did use those specific referrals.

<sup>10</sup> A participant may be referred for more than one service over the length of their participation in ATD.



<b>Referrals by Status Over Time<sup>11</sup></b>				
<b>Month/Year<sup>12</sup></b>	<b>Referrals</b>	<b>Approved by ICE</b>	<b>Utilized</b>	<b>Percent Utilized</b>
February 2020	28	28	7	25.0%
March 2020	33	30	5	15.2%
April 2020	-	-	-	n/a
May 2020	343	179	141	41.1%
June 2020	96	53	54	56.3%
July 2020	123	114	87	70.7%
August 2020	147	142	102	69.4%
September 2020	181	172	126	69.6%
October 2020	163	152	128	78.5%
November 2020	245	191	153	62.4%
December 2020	150	145	120	80.0%
January 2021	239	225	184	77.0%
February 2021	1,088	994	398	36.6%
March 2021	1,143	1,067	486	42.5%
April 2021	1,885	1,861	647	34.3%
May 2021	1,915	1,879	570	29.8%
June 2021	1,154	1,132	522	45.2%
July 2021	1,525	1,500	678	44.5%
August 2021	1,663	1,658	717	43.1%
September 2021	1,841	1,831	707	38.4%
October 2021	2,406	2,382	918	38.2%
November 2021	2,087	2,074	920	44.1%
December 2021	1,927	1,916	803	41.7%
January 2022	2,471	2,456	1,073	43.4%
February 2022	2,719	2,666	1,095	40.3%
March 2022	3,167	3,127	1,344	42.4%
April 2022	2,851	2,771	1,169	41.0%
May 2022	2,738	2,687	1,267	46.3%
June 2022	3,025	2,975	1,319	43.6%
July 2022	2,642	2,626	1,164	44.1%
August 2022	2,926	2,882	1,418	48.5%

<sup>11</sup> Referrals includes Human Trafficking Education, which does not require ICE approval and excludes those with a Pending status. In previous reports, “Approved by ICE” was labeled as “Utilized.” Upon methodology review and expansion of data sources, this table now includes three groupings and is more representative of participant actual use of the referrals for services.

<sup>12</sup> Month/Year are based off Assigned Date.

<b>Referrals by Status Over Time<sup>11</sup></b>				
<b>Month/Year<sup>12</sup></b>	<b>Referrals</b>	<b>Approved by ICE</b>	<b>Utilized</b>	<b>Percent Utilized</b>
September 2022	2,951	2,895	1,373	46.5%
October 2022	2,578	2,529	1,202	46.6%
November 2022	2,885	2,831	1,231	42.7%
December 2022	2,988	2,961	1,266	42.4%
January 2023	3,425	3,367	1,559	45.5%
February 2023	3,395	3,370	1,573	46.3%
March 2023	4,226	4,169	2,118	50.1%
April 2023	3,567	3,512	1,709	47.9%
May 2023	3,752	3,660	1,758	46.9%
June 2023	3,539	3,484	1,631	46.1%
July 2023	3,663	3,615	1,530	41.8%
August 2023	4,284	4,209	1,907	44.5%
September 2023	3,607	3,497	803	22.3%
<b>Total<sup>13</sup></b>	<b>87,781</b>	<b>86,014</b>	<b>37,982</b>	<b>43.3%</b>

For the period immediately following the early stages of the COVID-19 pandemic (April-June 2020), WSS were suspended to comply with pandemic mitigation orders. During this time, the NGOs sought approval to provide mental health services in a virtual setting. These telehealth-style solutions were ultimately approved for use in the ISAP contract and later adopted as a permanent offering. In August 2020, a virtual offering was adopted through the ISAP IV contract.

**The following table is a breakdown of referrals by legal stage (prior to or following an order of removal) through FY 2023:**

<b>Unique Referrals by Legal Stage<sup>14</sup></b>		
<b>Legal Stage</b>	<b>Count</b>	<b>Percent</b>
Pre-Order <sup>15</sup>	53,489	88.56%
Post-Order	5,012	8.30%
Appeal	1,895	3.14%
Unknown	1	>.01%
<b>Total<sup>16</sup></b>	<b>60,397</b>	<b>100.00%</b>

<sup>13</sup> The ATD - ISAP TotalAccess is a “living” database; as such, the totals are subject to change in instances such as system updates or necessary historical modifications completed for accuracy purposes. All data in this report are as of September 30, 2023.

<sup>14</sup> Unique count of participants based on the oldest assigned date.

<sup>15</sup> Approximately 89 percent of WSS referrals are Pre-Order participants at the time of first assigned date.

<sup>16</sup> Unique count of participants based on the oldest assigned date.

The following table shows referrals broken down by provider through FY 2023:

<b>Referrals by Provider (NGO)</b>				
<b>Provider</b>	<b>Referrals</b>	<b>Approved Referrals</b>	<b>Utilized Referrals</b>	<b>% Share of Total Utilized Referrals<sup>17</sup></b>
A Quarter Blue	65	62	3	0.01%
Abraxas	1,802	1,802	925	2.44%
Bethany Christian Services	27,125	26,621	11,262	29.65%
Center For Family Services	277	277	67	0.18%
Centro Multicultural La Familia	39	39	6	0.02%
Endeavors	37,026	36,363	15,167	39.93%
Family Success	1,195	1,158	729	1.92%
Golden State	936	933	709	1.87%
International Institute of Los Angeles	100	95	15	0.04%
Lutheran Social Services	6,543	6,440	3,063	8.06%
North Star Family Center	6,770	6,626	3,766	9.92%
Project Help	438	437	68	0.18%
Ser Familia	45	45	2	0.01%
Stars Behavioral Health Group	1,708	1,669	837	2.20%
Survivors' Pathway	1,523	1,463	853	2.25%
Trauma Resolution Center	476	444	155	0.41%
U.S. Conference of Catholic Bishops	1,713	1,540	355	0.93%
<b>Total</b>	<b>87,781</b>	<b>86,014</b>	<b>37,982</b>	<b>100.00%</b>

<sup>17</sup> Totals may not equal exactly 100 percent due to rounding.

The following table is a breakdown of referrals by type of service:

Type of Service	Referrals	Approved	Utilized	% Share of Total Utilized Referrals <sup>18</sup>	Associated Costs
SSE <sup>19</sup>	58,954	58,551	22,219	58.50%	\$7,797,929.00
Individual Therapy	11,942	11,533	8,640	22.75%	\$16,374,128.00
Human Trafficking Education	4,530	4,355	276	0.73%	\$299,414.00
Parenting Education	3,219	3,144	2,218	5.84%	\$4,682,377.00
Child Abuse & Prevention	3,171	3,084	2,164	5.70%	\$1,129,100.00
Individual Rehabilitation	3,032	2,924	1,589	4.18%	\$2,008,663.00
Trafficking Screening	1,211	1,120	216	0.57%	\$100,625.00
Family Therapy	1,051	942	390	1.03%	\$474,086.00
Repatriation	671	361	270	0.71%	\$701,669.00
<b>Total</b>	<b>87,781</b>	<b>86,014</b>	<b>37,982</b>	<b>100%</b>	<b>\$33,567,991.00</b>

<sup>18</sup> Totals may not equal exactly 100 percent due to rounding.

<sup>19</sup> Mental health evaluations were renamed SSE in FY 2021. There are no associated costs with the three referrals to MHE as none were used by noncitizens. Those three were added to SSE totals.

## IV. Analysis/Discussion

While ICE is committed to ensuring all participants comply with immigration court process, ICE is also interested in ensuring individuals and families who have particular needs, whether social, emotional, or familial, are matched with appropriate resources to better facilitate compliance with and participation in immigration proceedings.

ICE began using WSS in February 2020 and is still using it as of the writing of this report. Since inception, ICE has been tracking referrals and outcomes for those participants who were assigned to ATD – ISAP. There are three distinct groups of participants who were assigned to ATD – ISAP:

- Those who were not assigned WSS support;
- Those who were referred for WSS support and did not utilize those referrals; and
- Those who were referred for WSS support and took advantage of the referrals.

Using data from approximately 800,000 ATD – ISAP participants over the same period of time, ICE reviewed the WSS program, associated rates, and costs associated, and observed the following results:

Compliance Rate	Non-WSS		Referred Not Utilized		Utilized	
	Count	Percent	Count	Percent	Count	Percent
Complied	663,722	86.3%	16,826	80.7%	8,232	82.7%
Failed to Comply (including absconders)	105,697	13.7%	4,026	19.3%	1,720	17.3%
Absconded	89,273	11.6%	3,337	16.0%	1,416	14.2%
<b>Total</b>	<b>769,419</b>	<b>100.0%</b>	<b>20,852</b>	<b>100.0%</b>	<b>9,952</b>	<b>100.0%</b>

The chart above shows noncitizens who complied with all reporting requirements and noncitizens who failed to comply with all reporting requirements, including those who absconded. As can be seen in the chart above, the vast majority of ATD – ISAP participants were not referred for WSS; fewer than four percent of all ATD participants ultimately received WSS referrals. Furthermore, uptake of WSS for those referred is limited; of the 30,804 individuals who were referred for WSS, only 36.6 percent used any referral.

The chart above also reflects that participants who were assigned to ATD – ISAP and not referred for WSS had higher compliance rates than individuals who were referred to WSS. However, there are multiple factors potentially at play, including that the sample size of those not referred for WSS is far larger than the sample size of those referred for WSS, and that those who referred for WSS might have greater vulnerabilities or needs that could render compliance potentially more difficult.

## V. Conclusion

WSS was intended to provide services that assist participants with successfully engaging in the immigration process. ICE benefits from WSS when there is increased compliance with a participant's requirement to appear before the Executive Office for Immigration Review and when a participant is meaningfully engaged with their repatriation.

ICE dedicated approximately \$34 million in funding towards WSS over the last four fiscal years. However, analysis of approximately 800,000 participant outcomes over almost four years does not reveal a clear link between WSS and success with release requirements, compliance with appearances in court, or data that supports the participants actively and successfully engaged with repatriation services and departures. This, coupled with the data showing that the participants utilize the services less than 37 percent of the time, suggests that ICE must reassess WSS and identify referral resources that illustrate a significant benefit to the government.

## Appendix: Abbreviations

<b>Abbreviation</b>	<b>Definition</b>
AMO	ATD Monitoring Officer
AOR	Area of Responsibility
ATD	Alternatives to Detention
BI	BI Incorporated
COVID-19	Coronavirus Disease 2019
CS	Case Specialist
DHS	Department of Homeland Security
ERO	Enforcement and Removal Operations
FY	Fiscal Year
ICE	U.S. Immigration and Customs Enforcement
ISAP	Intensive Supervision Appearance Program
MHSE	Mental Health Screening and Evaluation
NGO	Nongovernmental Organization
SSE	Supplemental Services Evaluation
WSS	Wraparound Stabilization Service(s)