September 2026

Protecting Immigrant Children from Emerging Threats: What You Need to Know and How You Can Help

I. RECENT DEVELOPMENTS **1**

A. CUTTING OFF LEGAL SERVICES 1

B. EXPANSION OF FAMILY AND CHILD DETENTION 3

C. INTENTIONAL FAMILY SEPARATION 4

D. CHANGES TO THE FOUNDATIONAL RULE 4

E. INCREASING COORDINATION BETWEEN ICE AND ORR 4

F. USING CHILDREN AS "BAIT" 5

2. TAKE ACTION **5**



I. RECENT DEVELOPMENTS

The Trump administration's mass detention and deportation agenda is escalating and expanding at a previously unimaginable scope and scale. Among the most alarming developments is the administration's continued weaponization of immigration policy and

government resources to traumatize children and separate families. This includes expansion of family and child detention, cutting children and families off from vital legal resources, and increasing cruel tactics of coercion and family separation to speed up detentions and deportations.

The impact on families and children is palpable. Babies are being forced to represent themselves in immigration court. ICE is detaining children on their way to school and soccer games.

People are struggling right now across the United States. Instead of spending billions of taxpayer dollars on mass deportations and detentions and family separation, communities are demanding lawmakers redirect that money to provide more housing, healthcare options, and education and job training opportunities for everyone to help strengthen communities across the country.

A. CUTTING OFF LEGAL SERVICES

For nearly two decades, Congress has funded legal representation for unaccompanied immigrant children on a bipartisan basis. Congress recognized these children, many of whom fled violence, abuse, and trafficking, cannot be expected to navigate one of the country's most complex legal systems alone. That's why the Trafficking Victims Protection Reauthorization Act requires the federal government to ensure "to the greatest extent possible" that unaccompanied children are provided with lawyers to represent them in their immigration cases. Unaccompanied children need attorneys who specialize in immigration law, and equally importantly, know how to work with children.

But on July 31, Acacia Center for Justice's contract to provide legal representation to more than 20,000 unaccompanied children expired. Health and Human Services (HHS) then awarded contracts to a law firm and anti-trafficking organization that appear to have no experience with immigration law and no immigration lawyers on staff; the former has now withdrawn from the contract, and the latter - Our Rescue - has been mired in controversy.

Our Rescue - formerly Operation Underground Railroad - has come under intense scrutiny for a variety of concerning matters. Charity Watch reported that Our Rescue failed to report more than $4.8 million on its IRS Form 990. Its founder, Tim Ballard, was ousted after an investigation into sexual misconduct. Several journalists reported on the organization's questionable tactics, and a series of VICE News investigations found Our Rescue and Ballard had a pattern of distorting and exaggerating their international rescues and their role in domestic law enforcement operations.

International trafficking expert Anne Gallagher criticized OUR's methods, arguing that its operatives lacked the training and experience necessary for sensitive trafficking investigations and that its approach reflected an alarming misunderstanding of how sophisticated trafficking networks operate.

Based on its history, we are very concerned the contract that is intended to protect vulnerable children will have the opposite effect. Without experienced legal counsel, these children will not know what relief they may qualify for or what steps they must take to obtain legal status. Since July 31, Acacia has observed the following among unaccompanied children who arrived in court or entered Office of Refugee Resettlement (ORR) custody without lawyers by their side:

- Children are appearing before judges with no counsel, and no understanding of their rights.
- Attorneys in the network continue to work with clients and are representing children in asylum interviews and court largely for free while they fundraise for emergency funding.
- Some children are at critical junctures in their cases where changing counsel would prejudice their cases, and are frightened to build rapport with yet another unknown adult, particularly one who might not have their best interest at heart.
- The government still has made no provision for orderly transition of children's cases

Congress must intervene and demand that the administration award contracts to lawyers and organizations with the qualifications to provide children with the effective, independent legal representation that is required under current law.

B. EXPANSION OF FAMILY AND CHILD DETENTION

While the administration is blocking children's access to the protection they need by cutting off all access to attorneys, it is also building out the infrastructure to detain and deport children en masse.

1. *Alexandria, LA*

The Trump administration plans to open a new ICE detention facility that will be dedicated to detaining unaccompanied kids and families in former military barracks adjacent to the Alexandria International Airport in Louisiana in order to speed up their deportation. Latest intel indicates ICE is eyeing an October opening. Immigrant justice advocates at the local,

state, and national level are demanding the England Economic and Industrial Development District Board of Commissioners cut the ICE contract.

The Alexandria proposal is ICE's latest attempt at the "amazonification" of the detention and deportation system, further dehumanizing people – in this case, children and families – as products to be warehoused, shipped, and discarded. The proposed detention center in Alexandria sits on one of the country's most Pfas-contaminated sites 'forever chemicals' levels "at least 575,000 times higher" than the federal drinking water limit, posing an immense health and safety risk for the families, and especially the children, detained there. It will be run by LaSalle Family Foundation - a group with direct ties to LaSalle Corrections, a private prison company notorious for abuse, retaliation, and neglect in its ICE facilities, including conducting invasive, nonconsensual gynecological procedures.

Despite overwhelming community resistance, numerous testimonies, and an open letter to the board members at the company's board meeting in July, the England Authority continues to silence community opposition.

2. *Intake Facilities*

The Trump administration is seeking contractors to quickly open and operate "emergency intake" facilities that can hold up to 3,000 unaccompanied children per location. The federal request for proposals was posted on July 17, 2026.

This follows reporting that under Trump, Immigration and Customs Enforcement (ICE) has locked more than 140,000 people, including children, in 170 so-called "hold rooms" across the country, according to the Colorado Times Recorder. According to the report, ICE is detaining people in these facilities for up to months on end, even though they do not contain beds and are not required to have toilets.

C. INTENTIONAL FAMILY SEPARATION

Increasingly, the "unaccompanied" children coming into government custody are not children who crossed the border into the U.S. alone, but children whom ICE has separated from their families.

ICE frequently arrests one parent with their children, then separates the parent from the children and sends the parent to an adult immigrant detention facility while sending the children into ORR custody. The parents are then forced to choose between being

deported as a family or being deported individually and risk never seeing their children again.

D. CHANGES TO THE FOUNDATIONAL RULE

The Trump administration recently proposed changes to the ORR Foundational Rule that would invite abuse of children in federal custody and make it impossible for many children to reunite with their families. Among other things, this rule would:

- Authorize federal contractors to conduct invasive physical examinations of children's bodies to search for "gang-related tattoos"; and
- Introduce new sponsor vetting requirements that will block family reunification for many children by requiring sponsors to prove their identity with documents that are often unavailable to them, and to meet new financial eligibility requirements.

E. INCREASING COORDINATION BETWEEN ICE AND ORR

By prioritizing immigration enforcement over child well-being and enacting new barriers to family reunification, the administration is making it more difficult for children to be released from government custody, leading to prolonged detention and family separation.

ORR is a child welfare agency responsible for caring for unaccompanied children and reuniting them with their families. Historically, ORR has operated separately from ICE and has not participated in immigration enforcement because doing so would undermine the goal of protecting children above all else.

Yet internal data shows that ORR has shared more than 460,000 leads with ICE since January 2025, and more than 12,000 people—presumably unaccompanied children and their sponsors or other family members—have been arrested by immigration authorities based on the information ORR has shared with ICE.

F. USING CHILDREN AS "BAIT"

The administration is using children as "bait" to capture their parents by separating children and parents while they are detained and sending children into ORR custody to force non-detained parents to come forward as sponsors, at which point ICE will arrest and detain them, too.

As a result, children now face prolonged detention in jail-like settings, with the average length of time children spend in ORR custody skyrocketing from about one month to over six months.

While in custody, children are frequently subjected to coercive removal practices such as ICE interviews without an attorney present and pressure to accept voluntary departure or expedited return to places where they face grave danger.

2. TAKE ACTION

Congress must protect children and families by:

1. restoring access to qualified, independent legal representation for unaccompanied children.

2. preventing any new, large-scale child detention facilities from opening, including the dangerous, large-scale family and child detention camp under construction in Alexandria, Louisiana.

3. ensuring that the agency responsible for unaccompanied children's welfare operates independently from immigration enforcement agencies.

→ Use our online action tool to Tell Congress: Protect Unaccompanied Children!

4. ending the practice of family detention once and for all.

5. cutting off funding for family detention.

6. providing rigorous oversight of family detention facilities.

→ Use our online action tool to Tell Congress: End Family Detention Now!

Free Families: The National Coalition to End Family and Child Detention is a nonpartisan coalition. Our work is grounded in nonpartisan education, advocacy, public policy, and community engagement. Free Families does not endorse, support, or oppose candidates for public office or political parties. We are led by Acacia Center for Justice, American Friends Service Committee, Amnesty International USA, Children's Defense Fund-Texas, Detention Watch Network, Kairos Center, and Tsuru for Solidarity.