



Photo Credit Maria Fleischmann / World Bank

**More than Words:
Making Good on the Promise of the Central
American Minors Refugee and Parole Program**

September 21, 2022

About IRAP

The International Refugee Assistance Project (IRAP) is a global legal aid and advocacy organization working to create a world where refugees and all people seeking safety are empowered to claim their right to freedom of movement and a path to lasting refuge.

This report compiles information that IRAP has learned in litigation, through engaging in policy advocacy, and through legal representation of clients in the Central American Minors (CAM) Refugee and Parole Program.

We would like to thank the following individuals for sharing their expertise and time by reviewing this report: Catharine Christie, Policy Analyst at U.S. Committee for Refugees and Immigrants (USCRI); Erlinda Garcia, Program Officer – Family Reunification at the International Rescue Committee; Tatiana Méndez, Program Coordinator - Central American Minors (CAM) Hotline at the International Rescue Committee; and Yael Schacher, Deputy Director for the Americas and Europe at Refugees International.

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Executive Summary

The Central American Minors Refugee and Parole Program (CAM Program) allows certain parents and legal guardians in the United States to apply for their children and eligible family members in Honduras, Guatemala, or El Salvador to reunite with them in safety in the United States as refugees or parolees. Created in 2014 by the Obama administration, the Program was terminated by the Trump administration over the course of 2017 and 2018. The Biden administration restarted it in two phases in 2021. “Phase 1” in March 2021 allowed the processing of applications that were prematurely closed due to the CAM Program’s termination. “Phase 2” in September 2021 expanded the populations eligible for CAM and opened the program to new applications.

Yet a year and a half after restarting CAM processing and one year since beginning to accept new applications, the administration has not done nearly enough to fix the CAM Program’s long-standing challenges. As a result, many eligible families are unable to even apply to the CAM Program and thousands are left waiting indefinitely to reunite with their families in the United States.

The International Refugee Assistance Project (IRAP) calls on the Biden administration to invest in improving this family reunification program. This report documents the inadequate status quo of the CAM Program and offers specific recommendations for the Biden administration to improve its speed and scale.

Recommendation 1: Establish meaningful access to the CAM Program, especially for families eligible under the expanded criteria.

Recommendation 2: Improve processing times and decrease barriers to reunify families in no more than twelve months.

Recommendation 3: Ensure fair adjudication by permitting access to counsel and instituting transparency measures.

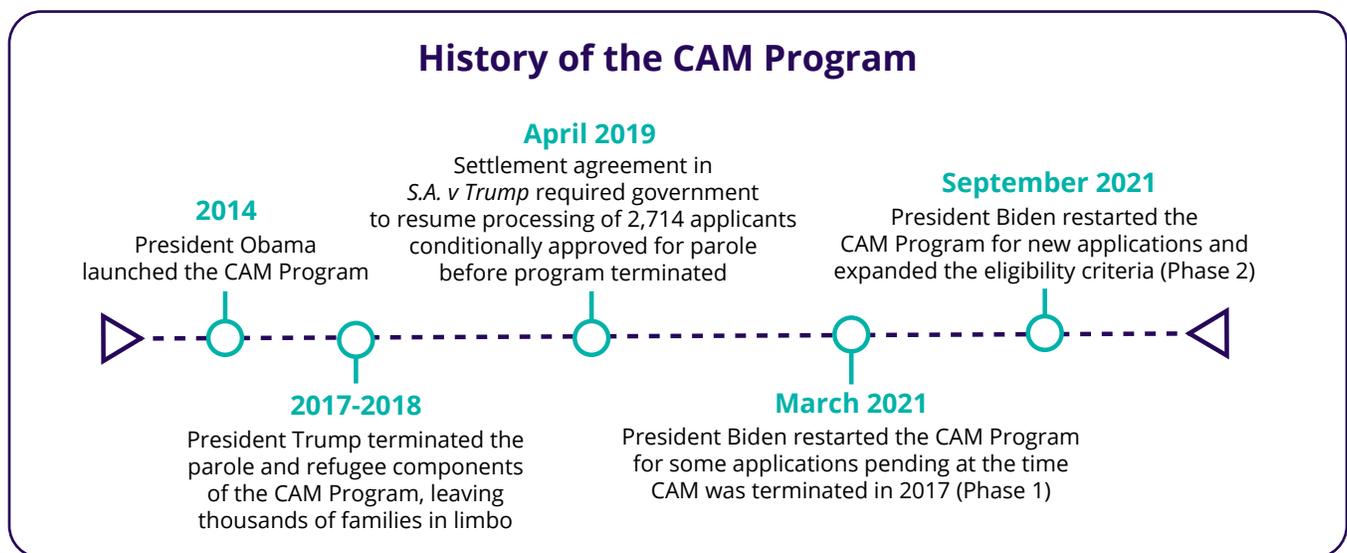
“Now that I am safe, I worry every day about my children and wish they were with me. I am worried that the people who threatened me in Honduras will come after my kids and hurt them.”

- Uzias,*¹ a father who is still waiting to reunite with his family through CAM

I. Introduction

The Central American Minors Refugee and Parole Program (CAM Program) allows certain parents and legal guardians in the United States to apply for their children and eligible family members in Honduras, Guatemala, or El Salvador to reunite with them in safety in the United States as refugees or parolees.² Created in 2014 by the Obama administration, the Program was terminated by the Trump administration over the course of 2017 and 2018. The Biden administration restarted it in two phases in 2021. “Phase 1” in March 2021 allowed the processing of applications that were prematurely closed due to the CAM Program’s termination. “Phase 2” in September 2021 expanded the populations eligible for CAM and opened the program to new applications.

Yet a year and a half after restarting CAM processing and one year since beginning to accept new applications, the administration has not done nearly enough to fix the CAM Program’s long-standing challenges. **As a result, many eligible families are unable to even submit a CAM application and thousands are left waiting indefinitely to reunite with their families in the United States.**



1 All names with an asterisk have been changed to protect the safety of CAM applicants and their in-country family members.
2 “Central American Minors (CAM) Refugee and Parole Program,” U.S. Citizenship and Immigration Services, last modified June 22, 2022, <https://www.uscis.gov/CAM>.

CAM Phase 2 Expanded Eligibility:

As of September 2021, parents and legal guardians who are in the United States with the following statuses are eligible to apply to reunite with their children and eligible family members through CAM:

- Lawful permanent resident (LPR)
- Temporary Protected Status (TPS)
- Deferred Enforcement Departure (DED)
- Parole
- Deferred Action
- Withholding of Removal
- Pending asylum application filed before May 15, 2021
- Pending U visa application filed before May 15, 2021

While the CAM Program has always suffered from structural issues limiting its functionality, in the first few years of existence, it enabled thousands of children to reunite with their families.³ Yet today, the CAM Program is processing only hundreds of applications, rather than thousands.⁴

From its inception, the CAM Program has been billed as a “safe, legal, orderly alternative” for unaccompanied children from the Northern Triangle to reunite with family in the United States, in lieu of taking the dangerous journey over land to the U.S.-Mexican border.⁵ The U.S. government has also touted the program as one part of a Latin America regional migration strategy that includes legal pathways for those needing protection.⁶ Unfortunately, from the start under the Obama administration to today, the difficulty accessing the CAM Program and neverending processing delays have meant that it cannot meet the humanitarian needs of most vulnerable children fleeing danger and seeking to reunite safely with their families in the United States.

Despite this reality, **CAM is a protection and family reunification pathway that thousands of families rely on and that tens of thousands more could benefit from.**

CAM by the Numbers

A review of the initial iteration of the CAM Program is instructive. Between its inception in December 2014 and March 2017, approximately 12,100 CAM applications, almost all from

3 U.S. Department of Homeland Security, Office of the Citizenship and Immigration Services Ombudsman, *Recommendation on the Central American Minors (CAM) Refugee/Parole Program* (Dec 2016), https://www.dhs.gov/sites/default/files/publications/citizenship_and_immigration_service_ombudsman.pdf.

4 “U.S. Refugee Admissions Program: Fact Sheet,” U.S. Department of State, June 10, 2022, <https://www.state.gov/u-s-refugee-admissions-program/>.

5 “Expansion of the Central American Minors (CAM) Program,” U.S. Department of State, Archived Content, November 15, 2016, <https://2009-2017.state.gov/r/pa/prs/ps/2016/11/264332.htm>.

6 “Fact Sheet: The Los Angeles Declaration on Migration and Protection U.S. Government and Foreign Partner Deliverables,” The White House Briefing Room, June 10, 2022, <https://www.whitehouse.gov/briefing-room/statements-releases/2022/06/10/fact-sheet-the-los-angeles-declaration-on-migration-and-protection-u-s-government-and-foreign-partner-deliverables/>; “Restarting the Central American Minors Program,” U.S. Department of State, March 10, 2021, <https://www.state.gov/restarting-the-central-american-minors-program/>; “Joint Statement by the U.S. Department of State and U.S. Department of Homeland Security on the Expansion of Access to the Central American Minors Program,” U.S. Department of State, September 13, 2021, <https://www.state.gov/joint-statement-by-the-u-s-department-of-state-and-u-s-department-of-homeland-security-on-the-expansion-of-access-to-the-central-american-minors-program/>.

Temporary Protected Status (TPS)-holding parents from El Salvador, were filed.⁷ By March 2017, U.S. Citizenship and Immigration Services (USCIS) issued decisions in approximately half of the filed cases. By August 2017, half of the CAM applicants with decisions finished in-country processing and were reunited with their families in the United States (1,627 as refugees and 1,465 as parolees).⁸ In terms of processing rates, at the end of Fiscal Year 2016, close to 2,000 cases were being interviewed quarterly and the average CAM case processing time was 331 days from the time an application was filed with the Department of State (DOS) to travel to the United States.⁹

In contrast, despite the advantage of not having to stand up a program from scratch and beginning with a pool of already-filed CAM applications, since March 2021, when the Biden administration began Phase 1 of the CAM Program, only a few hundred of the nearly 3,800 families eligible have had their cases completed.¹⁰ At current processing rates, it will likely be **more than a decade** before all of those who applied between 2014 and 2017 have their cases processed.

Further, in the last 12 months since the Biden administration opened the expanded Phase 2 of the CAM Program, **only a few hundred families, out of many thousands eligible, have been able to file new CAM applications with the assistance of refugee Resettlement Agencies.** As far as

Refugee Versus Parole Status

All CAM applicants are first considered for **refugee** status. If the applicant is found ineligible as a refugee, they are considered automatically on a case-by-case basis for **parole**.

Refugee status: Permanent status

- Pathway to green card and citizenship
- Automatic work authorization
- Ability to bring some family members as refugees
- Eligibility for state and federal benefits

Parole status: Temporary status with possibility to renew

- No pathway to green card
- Permission to apply for work permit
- Ability to apply after one year for CAM for some family members
- No eligibility for many state and federal benefits

7 Greenberg, Mark et al, *Relaunching the Central American Minors Program: Opportunities to Enhance Child Safety and Family Reunification* (Migration Policy Institute, 2021), https://www.migrationpolicy.org/sites/default/files/publications/cam-program-2021-english_final.pdf.

8 Ibid.

9 U.S. Department of Homeland Security, Office of the Citizenship and Immigration Services Ombudsman, *Recommendation on the Central American Minors (CAM) Refugee/Parole Program* (Dec 2016), https://www.dhs.gov/sites/default/files/publications/citizenship_and_immigration_service_ombudsman.pdf.

10 The Department of State reports that from April 2021 through June 10, 2022, approximately 130 CAM applicants were resettled as refugees and approximately 60 were paroled into the United States. IRAP requested updated data on CAM refugee and parolee case completions before the publication of this report. USCIS responded that as of September 1, 2022, more than 310 individuals were paroled into the United States through CAM in Fiscal Year 2022. This data may include parolees who were admitted under S.A. vs. Trump requirements that the government process applicants who were conditionally approved for parole before Trump terminated the program. IRAP requested information from USCIS if this data includes SA beneficiaries and also requested recent data on CAM refugee arrivals from PRM. As of publication, IRAP has not received that information.

IRAP is aware, to date not one person who applied to the CAM Program under Phase 2 has been reunited with their family in the United States through the CAM Program.¹¹

Reforming the Program

Since 2014, the USCIS Ombudsman,¹² IRAP, and other NGOs¹³ and stakeholders have all documented the numerous challenges and failures of the CAM Program and have provided recommendations to streamline and improve the quality of CAM processing. The vast majority of those original concerns remain unaddressed today and many of the original recommendations are as relevant as ever.

The three most pressing issues facing the CAM Program are:

- 1. Bottlenecks in accessing CAM prevent large numbers of eligible families from applying.**
- 2. Lengthy adjudication timelines further endanger vulnerable children.**
- 3. Lack of counsel and lack of transparency risk unfair case outcomes.**

To address each of these issues, there are three concrete steps that we recommend the administration take to make good on what it has offered: expanded access to CAM and prompt and fair processing for Central American children reuniting with family.

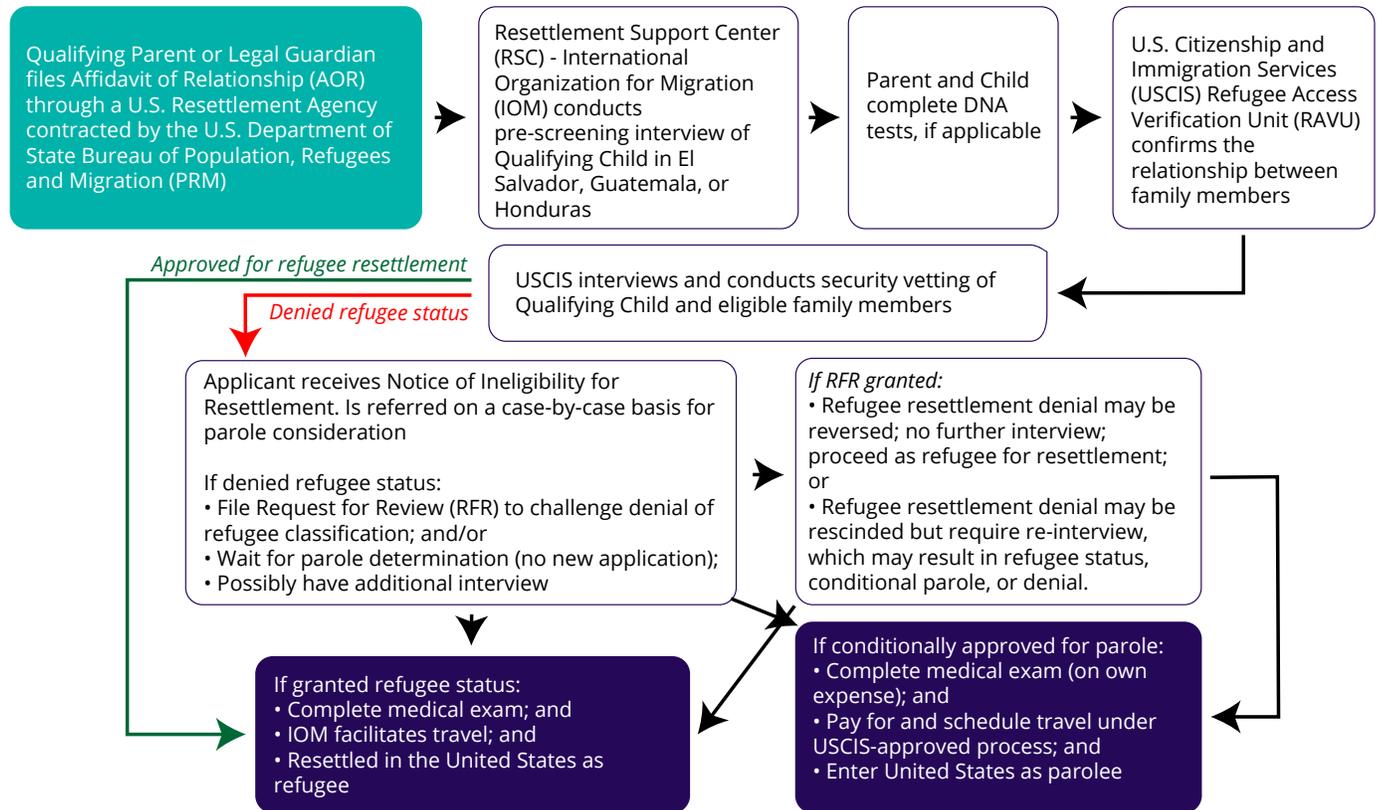
Recommendation 1: Establish meaningful access to the CAM Program, especially for families eligible under the expanded criteria.

Recommendation 2: Improve processing times and decrease barriers to reunify families in no more than twelve months.

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- ¹¹ The numbers of CAM applicants to reach the United States published by DOS or DHS does not provide that any has been from Phase 2.
 - ¹² U.S. Department of Homeland Security, Office of the Citizenship and Immigration Services Ombudsman, *Recommendation on the Central American Minors (CAM) Refugee/Parole Program*.
 - ¹³ Amber Moulton, Joshua Leach, and Kevin Ferreira, *Waiting for Refuge: Benefits and Challenges of the Central American Minors In-Country Refugee Processing Program (CAM)* (UUSC, GMIES, CIPRODEH, RAICES, 2016) https://www.uusc.org/wp-content/uploads/2016/12/Waiting-for-Refuge_December-2016.pdf; Greenberg et al, *Relaunching the Central American Minors Program: Opportunities to Enhance Child Safety and Family Reunification*; Kids In Need of Defense (KIND), *Thwarted Potential: The Need to Revive and Expand the Central American Minors (ACM) Program and a Key Path to Protection for At-Risk Unaccompanied Children* (2020) https://supportkind.org/wp-content/uploads/2020/11/Thwarted-Potential_-CAM-Report-FINAL-3.pdf. Note this is not an exhaustive list of recommendations.

Overview of CAM Process



II. Recommendations

A. Eliminate Bottlenecks

Bottlenecks in accessing CAM prevent large numbers of eligible families from applying

There is inadequate staffing and capacity across the country to file CAM applications. To apply for CAM, a parent or legal guardian must approach a local office of one of the nine national Resettlement Agencies (RAs), the only entities currently authorized to submit the initial CAM application form (known as the Affidavit of Relationship or AOR) to DOS’s Bureau of Population, Refugees, and Migration (PRM).¹⁴ This initial application process demands substantial labor and up-front expense from the RAs, and there is currently **no other way for families to access CAM.**

14 There are currently nine Resettlement Agencies (RA) that have contracts with PRM to provide initial social services and reception support to resettled refugees when they arrive in the United States. The original CAM Program required that RAs file CAM AORs and that structure exists today.

Many eligible parents or guardians are unable to access the CAM Program due to inadequate funding for RAs to file CAM applications promptly, if at all. For example, some RAs report waitlists in excess of 300 to 500 persons to file CAM AORs. Such delays are all but inevitable given that RAs receive no federal funding for their work filing AORs at the time they provide the service. Rather, RAs receive funding only after certain applicants make it through the CAM Program and arrive in the United States as refugees (a minority of cases) and do not receive funding for the majority of cases - those that are interminably pending or who arrive via parole.¹⁵ As a result, most of RAs' work on CAM applications is never compensated, even as they continue to suffer from funding and staffing cuts that were the result of Trump administration policies that still have not been fully rectified.¹⁶ Thus, the program's gatekeepers are unable to provide sufficient access to the program.

PRM rightly recognized the insufficient capacity of RAs to file CAM AORs at scale and, in January 2022, issued a Notice of Funding Opportunity (NOFO) to expand filing capacity for up to three additional organizations.¹⁷ However, six months after grantees were expected to start this work, PRM still has not publicly awarded the funds and, as far as IRAP is aware, no grantee has begun to engage in this work. Further, even if the maximum of three organizations are awarded funding, there will be markedly insufficient capacity to meet the needs of thousands of CAM-eligible families nationwide.

Finally, there has been little dissemination of information to the public, in the United States and in Central America, on the CAM Program for families to know about its reopening and expansion, their eligibility, and how to apply. However, information campaigns to increase knowledge of and interest in the CAM Program will have little impact if not matched with additional investments in RAs and NOFO grantees to file AORs, as mentioned above.

Recommendation: Establish meaningful access to the CAM Program, especially for families eligible under the expanded criteria, by taking the following steps:

- PRM must immediately award funding to grantee organizations to augment existing capacity to prepare and file AORs. Capacity for filing AORs is a primary obstacle for accessing the CAM Program, so expanding this capacity immediately is necessary for the program's basic functionality.

15 Greenberg et al, *Relaunching the Central American Minors Program: Opportunities to Enhance Child Safety and Family Reunification*.

16 Conor Finnegan and Ben Gittleson, "Trump 'decimated' refugee program hampering Biden's historic goal: Advocates," *ABC News*, February 18, 2021, <https://abcnews.go.com/Politics/trump-decimated-refugee-program-hampering-bidens-historic-goal/story?id=75911102>.

17 "FY 2022 Notice of Funding Opportunity for Technical Support to Central American Minors (CAM) Program Petitioners," U.S. Department of State, January 13, 2022, <https://www.state.gov/fy-2022-notice-of-funding-opportunity-for-technical-support-to-central-american-minors-cam-program-petitioners/>.

- PRM should fund RAs for *all* CAM applications they file no later than at the time of filing, which would enable them to dedicate sufficient staffing and resources to file AORs. The existing funding structure – under which RAs are refunded only when applicants arrive in the United States, and then only for CAM refugees – ultimately prevents basic access to family reunification. Moreover, as it stands resettlement agency local offices are only able to file AORs for persons living in a certain geographical region near their office. PRM should relax these geographical restrictions limiting RA CAM work so that RAs with the infrastructure and capacity to file AORs can do so for CAM applicants, even if they are located outside the office’s immediate radius.
- PRM should provide trainings to the local offices of the Resettlement Agencies about the CAM process and the expanded eligibility for CAM Phase 2 applications. There is a broad lack of knowledge about who qualifies under the expanded eligibility categories and the process for applying for CAM. With additional training, RA staff can better fulfill their role of filing applications. In addition, PRM should reach out to legal and social service providers who work with Central American communities to ensure that eligible families know about and can access the program.
- PRM should create digestible educational materials in multiple languages, including Spanish and Indigenous languages, for CAM-eligible families to inform them on all aspects of the CAM Program and what they can expect if they apply. These educational materials should also be shared through legal and social service providers.

Case Study

In June 2015, Timoteo* applied for his 15-year-old daughter, Sylvia,* to come to the United States through the CAM Program. Soon after he applied, the program was terminated by the Trump administration and Sylvia’s case was closed. Timoteo said that upon hearing the news of the program’s termination, “I felt helpless to do anything to bring my family together and that I was letting my whole family down. I also worried for my daughter’s safety.” In April of 2021, the Biden administration reopened the CAM Program for those, like Sylvia, who had been in the program when it was terminated in 2018. In August 2021, USCIS interviewed Sylvia for the CAM Program, but as of August 2022, there have been no further developments in her case. Timoteo has been waiting to reunite with his daughter for 7 years now.

B. Shorten Processing Timelines

Lengthy adjudication timelines further endanger vulnerable children

After parents and guardians finally submit CAM Program applications, it takes far too long for them to reunite with their children. Successive processing bottlenecks prevent timely adjudication of applications and undermine the CAM Program's potential as a viable pathway to safety and family reunification. For example, the DNA testing required to confirm biological ties at the start of the process is mired in delays. After DNA testing, USCIS must interview each child and render a decision on their case. During the first iteration of the CAM Program under the Obama administration, USCIS officers typically rendered decisions within days or weeks of the interview. Now, IRAP is aware of several children who have waited approximately *one year* for a decision after their interview and there are likely hundreds more who experience similar delays.

While waiting for years, separated from their parents, many children in the CAM Program are exposed to further danger in their communities. These unreasonably lengthy delays erode applicants' and advocates' trust in the CAM Program. Put plainly, eligible families must know that the CAM Program is a real option with reasonable processing times or else, understandably, they will not view family reunification through the program as a viable option.

Recommendation: Improve processing times and decrease barriers to reunify families in no more than twelve months, by taking the following steps:

- USCIS should hire and train additional Refugee Access Verification Unit (RAVU) staff. RAVU is responsible for confirming the relationship between family members applying to the CAM Program.¹⁸ This initial verification stage, which must be completed before a CAM applicant can be interviewed by a USCIS officer, is taking an unduly long time. By hiring more RAVU staff, USCIS could reduce this delay and review more family relationships in a timely manner.
- PRM should address numerous problems with DNA testing. Since September 2021, PRM no longer requires families to pay for DNA testing, but the government's DNA testing forms instruct DNA labs that families will pay for testing, resulting in the labs charging families, as well as delays and confusion. PRM should produce clear and accurate policy guidance on which applicants and DNA labs can clearly rely. Furthermore, PRM should modify its existing process to co-locate DNA testing sites with IOM pre-screening locations and initiate DNA testing at the same time the child and family in Central America undergo IOM prescreening.

18 "DHS/USCIS/PIA-049 Refugee Access Verification Unit," U.S. Department of Homeland Security, last modified June 8, 2022, <https://www.dhs.gov/publication/dhsuscispia-049-refugee-access-verification-unit>.

- USCIS should set and meet ambitious targets to conduct CAM interviews. As an example, a USCIS Ombudsman report on the CAM Program in 2016 recommended USCIS conduct 1,000 interviews for Q1 and at least 2,000 each quarter thereafter.¹⁹ While USCIS may need to set different metrics in this iteration of CAM, it should regularly schedule sufficient circuit rides to ensure applicants can receive timely interviews and their cases can be adjudicated in no more than twelve months. Increasing the number of circuit rides to Central America or establishing a regular or permanent circuit ride model, dedicating additional officers, and utilizing video technology for interviews would enable USCIS to meet such metrics.
- USCIS should consider opening an International Office (IO) in Honduras to increase capacity for refugee and parole interviews for CAM applicants, especially as the expanded CAM Program will likely process additional Honduran applicants in the coming years. IOs provide critical support to circuit ride staff and this recommendation could improve processing timelines overall.
- The Centers for Disease Control and Prevention (CDC) should approve more physicians to conduct medical exams for CAM applicants, including doctors outside of capital cities closer to where applicants live, so medical checks can meet the demand. Currently, all CAM cases approved for refugee resettlement or parole must complete a medical exam conducted by a CDC-approved panel physician.²⁰ There are only a handful of panel physicians approved to do medical exams for CAM applicants, which creates a substantial bottleneck in processing, particularly in light of COVID-19 restrictions further limiting the number of medical exams that each physician can complete weekly.²¹

Case Study

Elena's* father applied for the CAM Program to reunite with her in the United States in 2016. She has Epilepsy and Parkinson's and lived with her elderly grandmother in El Salvador who struggled to care for her while she waited to reunite with her father through CAM. Around 2017, Elena was approved as a CAM parolee, but her case was closed when the Trump administration terminated the program. Her case was finally reopened in March 2021. Elena spent over five years in CAM processing before finally reuniting with her father in the United States as a parolee in the summer of 2021.

19 U.S. Department of Homeland Security, Office of the Citizenship and Immigration Services Ombudsman, *Recommendation on the Central American Minors (CAM) Refugee/Parole Program*.

20 U.S. Citizenship and Immigration Services, "Central American Minors (CAM) Refugee and Parole Program."

21 S.A. v. Trump (Defendants' Twelfth Quarterly Report) <https://refugeerights.org/wp-content/uploads/2022/04/12th-Quarterly-Report.pdf>.

“I have waited so long for my son to come to the United States, and I am losing hope.”

-Jesus, a mother who is still waiting to reunite with her son since they applied for CAM in 2015*

C. Provide Access to Counsel and Transparency

Lack of counsel and lack of transparency risk unfair case outcomes

CAM applicants must participate in an interview with a trained USCIS officer before their case is approved. However, as in all refugee cases, CAM Program applicants are not permitted to have an attorney present in their interviews. Without access to counsel, many at-risk children and children in unsafe circumstances struggle to articulate the facts in support of their complex refugee claims.²² In addition to likely lowering the chances that a valid refugee case is approved, the absence of counsel undoubtedly increases the work USCIS officers must do to uncover the relevant facts, increasing processing times.

In addition, there is little current, detailed, public information available about the CAM Program’s processing times, case status, and outcomes. USCIS routinely makes this data available online for other populations through a system for case status inquiries based on receipt number, and through regularly updated processing time reports available online and disaggregated by application form and service center/field office.²³ Publishing such information promotes trust in the program and would allow applicants to make informed decisions in navigating the CAM Program. Legal service organizations are more likely to refer families to the program if they can access information about how long the process takes.

Recommendation: Ensure fair adjudication by permitting access to counsel and instituting transparency measures, by taking the following steps:

- USCIS should permit access to counsel for CAM applicants during their interviews- in accordance with President Biden’s Executive Order 14013.²⁴ Allowing counsel in CAM interviews is a necessary measure to ensure children are given a fair interview and is also

22 U.S. Department of Homeland Security, Office of the Citizenship and Immigration Services Ombudsman, *Recommendation on the Central American Minors (CAM) Refugee/Parole Program*.

23 “Case Status Online,” U.S. Citizenship and Immigration Services, <https://egov.uscis.gov/casestatus/landing.do>.

24 “Executive Order 14013 of February 4, 2021, Rebuilding and Enhancing Programs to Resettle Refugees and Planning for the Impact of Climate Change on Migration.”

aligned with statutory and regulatory requirements discussed in the USCIS Ombudsman’s 2016 Report on CAM.²⁵

- USCIS should institute a “Check Case Status” website feature for CAM Program cases as USCIS does for other types of cases. This would help families make plans based on realistic expectations of CAM Program processing.
- PRM and USCIS should regularly publish on their website average processing times and outcomes (including the number of CAM applications submitted and the number of refugees and parolees who entered the United States through CAM). This would increase general trust in the CAM Program from applicants, NGOs, and other stakeholders involved in the program.

Case Study

Rosa’s* husband initially applied for her and their son and daughter to reunite with him in the United States through the CAM Program in 2015. Rosa and her family faced danger in their community in El Salvador and were eager to reunite with their father in the United States. In 2017, USCIS notified Rosa that she and her children were approved for CAM parole. Shortly after learning this news, Rosa’s brother was murdered in a nearby community in El Salvador, which only heightened her fear. During this difficult time, what kept her going was knowing that her family would soon get to safety in the United States. Unfortunately, only a few months later, the Trump administration terminated the CAM Parole Program. Fortunately, their case was reopened following the result of a lawsuit challenging the termination of the program. Once they were re-approved, Rosa and her family faced further hurdles. After five years of processing and delays, Rosa and her daughter finally entered the United States through CAM as parolees in September 2020. While she and her daughter were finally able to enter the United States, her son had to wait even longer. Because fingerprinting is required for all CAM parolees age 14 or older, and he turned 14 while they were waiting for approval, he was now required to have his fingerprints taken. Due to COVID-19 restrictions, this process took even longer than usual. As a result, it was only in September 2021, over a year after Rosa and her daughter’s arrival, that her son made it to the United States. Although Rosa’s family is currently living together in safety in the United States, she knows that she and her children will have to apply for CAM re-parole in order to remain in the United States.

25 U.S. Department of Homeland Security, Office of the Citizenship and Immigration Services Ombudsman, *Recommendation on the Central American Minors (CAM) Refugee/Parole Program*.

III. Additional Considerations

While this report focuses on the core obstacles to the CAM Program's ability to meet the serious family reunification needs it was designed to address, families seeking to reunite through CAM face numerous other challenges. The following are recommendations to address these other shortcomings.

First, the CAM Program should develop expedited processing protocols to quickly process high risk applicants and ensure that the CAM process itself does not put applicants in danger. Indeed, the USCIS Ombudsman and others identified the lack of safe shelter protocols in Central America as a significant gap in the program, a dangerous omission for an in-country refugee processing program.²⁶ Moreover, to mitigate the risk of violence against CAM applicants, in-person appointments—such as for pre-screening, interviews, and medical exams—should be conducted in locations throughout each country, not just capital cities. IOM should also work closely with applicants on an individual basis to ensure safe travel options.

Second, per President Biden's Executive Order 14010, the administration should propose new particular social group (PSG) regulations or policy guidance in the refugee context codifying that persecution based on membership in a particular social group includes protection for those who are fleeing gender-based violence or gang violence.²⁷ Such a rule could have a significant effect on the correct adjudication of CAM refugee claims. Many children in Central America are experiencing persecution from gang violence or domestic violence. A PSG rule or policy guidance would clarify the application of existing legal standards to common Central American refugee claims.²⁸

Third, Congress and the administration should ensure that CAM parolees in the United States have access to resettlement services and legal support. Congress should appropriate additional funds so that CAM parolees can access social services and counsel. Legal support is also critical to ensure that CAM parolees understand what they must do to be able to work legally in the United States, enroll in school, and apply for more permanent status where they are eligible. The administration should also ensure parolees do not encounter long processing delays in applying for CAM re-parole.

26 U.S. Department of Homeland Security, Office of the Citizenship and Immigration Services Ombudsman, *Recommendation on the Central American Minors (CAM) Refugee/Parole Program*.

27 "Executive Order 14010 of February 2, 2021, Creating a Comprehensive Regional Framework to Address the Causes of Migration, to Manage Migration Throughout North and Central America, and to Provide Safe and Orderly Processing of Asylum Seekers at the United States Border."

28 *Deadly Inertia: Needless Delay of "Particular Social Group" Regulations Puts Asylum Seekers at Risk* (Center for Gender and Refugee Studies, 2022), https://cgrs.uchastings.edu/sites/default/files/Deadly%20Inertia%20-%20PSG%20Regs%20Guide_Feb.%202022.pdf.

IV. Conclusion

Today's reopened and expanded CAM Program is a mere shadow of its true potential. The administration's public statements touting CAM as a viable protection program are not reflected in reality.²⁹ The few hundred families reunified in 1.5 years under President Biden is a fraction of the Obama administration's record of over 2,500 families reunified in just over two years – at a time when the CAM Program was being built from scratch.

To make good on the promise of family reunification and protection offered by the CAM Program, the Biden administration must publicly commit to rapidly implement a plan to do better. Implementing the basic reforms outlined in this report would ensure that Central American families seeking reunification can rely on transparent information about the CAM Program and understand what they can expect if they apply.

Finally, the Biden administration must seriously invest in the CAM Program as one piece of a protection system that also includes robust access to asylum, the U.S. Refugee Admissions Program, use of humanitarian parole, and other family reunification pathways. Vulnerable children in Central America should be able to easily access as many humanitarian protection pathways as possible. Improving access, processing timelines, and transparency in the CAM Program is one step towards finding safety and reuniting with family in the United States more than a promise.

“When I learned that my daughter’s case was being reopened, I felt relieved and happy that she might be able to join us here after all these years. As a parent, it has been very hard for me to feel my daughter’s absence, to worry about her safety, and to stay patient through the years of processing.”

- Timoteo, a father who is still waiting to reunify with his daughter through CAM*

29 The White House Briefing Room, “Fact Sheet: The Los Angeles Declaration on Migration and Protection U.S. Government and Foreign Partner Deliverables;” U.S. Department of State, “Restarting the Central American Minors Program.”