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2020

Submission to the Special Rapporteur: Reports of Abuse of Migrant Children in U.S. Custody and Oversight Failures

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Recommended Citation

University of Chicago Law School - Global Human Rights Clinic, "Submission to the Special Rapporteur: Reports of Abuse of Migrant Children in U.S. Custody and Oversight Failures" (2020). *Global Human Rights Clinic*. 13.

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**INTERNATIONAL HUMAN RIGHTS CLINIC AT THE UNIVERSITY OF CHICAGO LAW SCHOOL
SUBMISSION TO THE SPECIAL RAPPORTEUR:
REPORTS OF ABUSE OF MIGRANT CHILDREN IN U.S. CUSTODY AND OVERSIGHT FAILURES**

Every year, tens of thousands of migrant children, many unaccompanied, journey to the United States in extremely dangerous and life-threatening circumstances. Both international and U.S. law require the U.S. government to treat these children with special concern. Yet, consistently, thousands of them report physical and psychological abuse at the hands of U.S. immigration officials; unsanitary and inhumane living conditions while in short and long-term detention; and extended periods of detention in violation of law. The International Human Rights Clinic (IHRC) of the University of Chicago Law School makes this submission to bring these life-altering abuses to the attention of the Special Rapporteur.¹ This submission is a follow-on to an IHRC and American Civil Liberties Union 2018 report on *Neglect and Abuse of Unaccompanied Immigrant Children by U.S. Customs and Border Protection* (Hereinafter IHRC/ACLU 2018 Report).² This submission will highlight the many failures in the oversight mechanisms designed to protect these children; in particular, the Office of the Inspector General (OIG) and the Office for Civil Rights and Civil Liberties (CRCL)'s failure to make prompt and independent inspections, and the Offices' inability to prompt meaningful reform.

I. Legal Framework

The U.S. has made long-standing commitments to safeguard the human-rights of migrants, and especially migrant children, through its domestic law and international treaty obligations. First, the U.S. ratified the *1967 Protocol Relating to the Status of Refugees* (the Protocol), which obligates it to protect those who qualify as refugees.³ To implement its obligations under the Protocol, the U.S. passed the *Refugee Act of 1980*,⁴ which directs the U.S. Attorney General to establish a system whereby any "alien physically present in the United States or at a land border or port of entry" may apply for asylum regardless of legal status.⁵ The Act also provides funding for states to ensure supervision, care, and legal responsibility for unaccompanied refugee children within their borders.⁶ Second, the U.S. ratified the *International Covenant on Civil and Political Rights* (ICCPR), which requires that all detained persons, children included, "be treated with humanity and with respect for the inherent dignity of the human person."⁷ With respect to children in particular, under the ICCPR, "every child" must have, without discrimination, "the right to such measures of protection as are required by his status as a minor."⁸ To meet its obligations to children under the ICCPR, the U.S. enacted the Trafficking Victims Protection Reauthorization Act (TVPRA) of 2008;⁹ the Act also implements the international *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children* at the national level.¹⁰ Finally, the U.S. has signed, but not ratified, the *UN Convention on Children's Rights* (CRC).¹¹ The CRC obligates countries to provide protection

and care for unaccompanied children, and to take into account children's best interest in every action affecting them. As a signatory, the U.S. is obliged to "refrain from acts which would defeat the object and purpose of [the] treaty."¹²

As later sections will explore, the U.S. is failing at its responsibility to children under all of these international instruments as a result of misdirected immigration policy; the absence of humane standards and practices in effectuating such policy; and a failure to properly supervise, regulate, and hold accountable its own government employees and institutions.

To fully understand these failures, it is helpful to provide a brief overview of the various executive departments involved in the apprehension, detention, and processing of immigrant children. The U.S. Department of Homeland Security (DHS) houses two agencies that focus primarily on immigration enforcement: U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP).¹³ ICE's stated aim is apprehension and removal of "public safety threats, such as convicted criminal aliens and gang members, as well as individuals who illegally re-entered the country after being removed..."¹⁴ CBP focuses its efforts on enforcing U.S. immigration laws at ports of entry and along the U.S. border. CBP officials are authorized "to interrogate any alien or person believed to be an alien as to his right to be or to remain in the United States," and "to arrest any alien who in his presence or view is entering or attempting to enter the United States" in violation of applicable U.S. law.¹⁵ These two agencies are typically the first point of contact for immigrant children apprehended in the U.S. While CBP apprehends children arriving at or near the U.S. border, ICE apprehends them within the country's interior during raids and other immigration enforcement actions.¹⁶

After DHS apprehends and detains migrant children, the children's wellbeing becomes the responsibility of the U.S. Department of Health and Human Services (HHS). Within HHS, the Office of Refugee Resettlement (ORR) is responsible "for the care and placement of unaccompanied alien children" in the U.S.¹⁷ ORR receives referrals from other executive agencies—most notably, DHS. Upon referral, children may be placed into ORR care. Most children are later released to sponsors, who are often family members.

There are several statutes and judicial standards particularly relevant to migrant children. The government agencies discussed above are subject to the *Flores Settlement*—a judicial settlement agreement that created nationwide standards on the treatment, detention, and release of children in federal government's custody.¹⁸ The *Flores Settlement* requires the government to provide detained children with basic necessities, including: safe and sanitary facilities; access to toilets and sinks; access to drinking water and food; medical assistance; adequate temperature control and ventilation; and adequate supervision in order to protect children from others, including unrelated adults.¹⁹ The government is further required to treat all children in custody "with dignity, respect and special concern for their particular vulnerability as minors" and "place each detained minor in the least restrictive setting appropriate to the minor's age and special needs."²⁰ The *Flores Settlement* governs the treatment of immigrant children in U.S. custody. Recently, the Department of Justice's Office of Immigration Litigation requested court relief from a 2017 court order requiring the government to provide detainees with hygiene items such

as soap and toothbrushes in order to comply with the “safe and sanitary conditions” requirement of the *Flores Settlement*.²¹ A Ninth Circuit Court of Appeals panel affirmed this requirement in 2019.²²

CBP is also bound by the Trafficking Victims Protection Act of 2000²³ (TVPA). The Act mandates that trafficking victims (primarily women and children) who are in federal custody “not be detained in facilities inappropriate to their status as crime victims,” receive necessary medical care, and be protected from ongoing threats to their safety.²⁴ The TVPA has been amended and reauthorized several times, most recently in 2019. Notably, the William Wilberforce Trafficking Victims Protection Reauthorization Act²⁵ (TVPRA, the 2008 reauthorization of the TVPA) was enacted in response “to ongoing concerns that CBP was not adequately screening apprehended UAC [“unaccompanied alien children,” meaning children apprehended without guardians or caretakers] for evidence of human trafficking or persecution.”²⁶ The statute directed the Secretary of DHS to develop policies and procedures to ensure that unaccompanied children in the U.S. could be safely repatriated.²⁷ Finally, the Victims of Abuse Act of 1990 (VCAA) requires all law enforcement personnel working in federal facilities to report suspected or alleged child abuse.²⁸

II. Oversight Concerns

Migrant children, and especially unaccompanied minors, are particularly vulnerable when they encounter the immigration system. Neglect and abuse at every stage of the immigration process has been reported and documented for decades, across every administration. These abuses persist largely due to lack of effective oversight and accountability mechanisms—both internally and externally—that can investigate and discipline violations. First, CBP itself has been plagued by internal oversight problems since its creation. Rapid, large-scale hiring that doubled the agency’s size between 2003 and 2009 led to drastically lowered hiring standards (which were already lowest among the primary federal law enforcement agencies) and suspended background checks, as well as substandard training.²⁹ These failures in turn produced remarkable corruption, which has only increased. Border officers’ criminal misconduct (from fraud to murder) reached a five-year peak in 2019, while arrests for CBP corruption have long outstripped those of any other federal law enforcement agency.³⁰ Although the current administration has called for the hiring of 5,000 new border patrol agents, this program has floundered due to recruiting and retention challenges.³¹

Within DHS, two oversight agencies are most relevant to monitoring the actions of CBP: the Office of the Inspector General (OIG) and the Office for Civil Rights and Civil Liberties (CRCL). As an “objective audit, inspection, and investigative body,”³² the OIG’s mission is to “provide independent oversight and promote excellence, integrity, and accountability within DHS.”³³ As such, the OIG investigates allegations of misconduct by DHS officials and employees, as well as allegations of corruption, fraud, or mismanagement in the agency, and

assesses DHS's operations to enforce immigration laws and ensure border security and public safety.³⁴

Despite OIG's mandate, reports indicate that in reality, OIG investigations, when they do happen, fail to adequately address allegations, perfunctorily dismissing complaints and claiming they are unsubstantiated despite direct testimony from the children affected.³⁵ Additionally, the investigations are drawn-out, lethargic procedures that fail to timely address dire situations. OIG states that its timeline for inspecting and issuing a report is typically within a year, but the clock seemingly does not start until the decision to perform an inspection, rather than the filing of the complaint,³⁶ allowing for delay. OIG has been "nearly dormant" under the Trump Administration. Currently, it is on track to publish only forty audits and reports in fiscal year 2020 (compared with 143 in 2016).³⁷ Recently, lawmakers on both sides of the political aisle wrote to the Inspector General, stating, "[a]llegations have come to our attention that the office has been plagued by ongoing bureaucratic infighting and competing allegations of misconduct that threaten OIG's ability to conduct effective oversight."³⁸ Importantly, OIG also lacks the legal authority to discipline any misconduct or remove bad actors.

CRCL, the second main internal oversight body within DHS, advises DHS, informs individuals about access to remedies, and investigates complaints filed by members of the public.³⁹ CRCL states that it "strives" to make its investigations transparent⁴⁰ and accessible.⁴¹ As explained further in the IHRC/ACLU 2018 Report, an unfortunate limitation of the CRCL complaint system is that the CRCL has the authority to conduct civil rights investigations but lacks the power to discipline or prosecute individual CBP officials or provide remedies for substantiated claims.⁴² It merely uses the complaints "to find and address problems in DHS policy and its implementation."⁴³ In practice, this means that many complaints are not fully addressed.⁴⁴ Furthermore, the investigations are demonstrably not as independent as they purport to be. Per the IHRC/ACLU 2018 Report, documents obtained through Freedom of Information Act (FOIA) revealed an inappropriate reliance of the CRCL on CBP personnel accounts and records. Rather than independently investigating complaints of abuse, CRCL instead refers those complaints *back* to CBP—the very entity accused of misconduct—to resolve. Furthermore, CRCL often recommends closing complaints that cannot be verified by CBP's records or personnel accounts, even though CRCL itself acknowledges that these records are often incomplete or inconsistent.⁴⁵ And while the VCAA provides that CRCL (and OIG) should report alleged child abuse under DHS to the FBI, there is no evidence that it has ever done so.⁴⁶

There are also internal mechanisms within ICE that are meant to provide oversight but similarly fail to do so effectively. The Detention Management Compliance Program (DMCP) sets out standards and procedures that guide ICE to comply with National Detention Standards (NDS) and operate detention centers that are "safe, secure, and humane [] for both detainees and staff."⁴⁷ Additionally, the ICE Office of Professional Responsibility (OPR), Office of Detention Oversight (ODO), is intended to "ensure independent internal management controls over ICE, the Detention Management Compliance Program, the safe and secure operation of detention facilities, and the humane treatment of ICE detainees."⁴⁸ ODO conducts inspections of detention

facilities and investigates allegations of detainee mistreatment, civil rights violations, and noncompliance with ICE standards, as well as detainee deaths while in custody.⁴⁹ Problematically, reports from inspections and investigations are simply sent to the Office of Enforcement and Removal Operations (ERO), the department within ICE that manages the detention facilities (and also conducts inspections), so that ERO can create “corrective action plans.”⁵⁰ Worse still, documents on inspections from 2007–2012 revealed multiple failures in the inspection system: ODO and ERO informed facilities about upcoming inspections; inconsistencies existed between ODO and ERO inspection reports and between reports for particular facilities; and inspections were designed to help facilities achieve passing scores (even despite deaths and other human-rights violations), rather than to identify and address violations.⁵¹

III. Abuse of Migrant Children

Despite several mechanisms for oversight within DHS and HHS, migrant children have reported myriad abuses for over a decade, including excessive force; physical and sexual abuse; verbal threats; failure to treat children with dignity, respect, and “special concern”; failure to maintain safe, secure, and clean facilities; denial of drinking water and food; denial of medical care; detention in excess of the seventy-two-hour maximum; and dangerous cell temperatures and disruptive sleeping conditions.⁵² These abuses demonstrate a clear failure of DHS and HHS in protecting migrant children; further, they reveal a systematic failure of oversight entities to make meaningful changes to address these concerns. Without accountability, abuses persist, proliferate, and worsen.

In one report from 2009, a fifteen-year-old reported that an agent handcuffed him, put on a glove, and hit him in the mouth, causing bleeding. Though other agents noticed the teenager’s injury, they did not provide the child with medical attention.⁵³ In another report, a fifteen-year-old reported that a CBP official punched him and hit him with a thorny branch, leaving a scar; when the child told the official he was a minor, the official replied, “I don’t care you son of a bitch.”⁵⁴ Another child reported that an agent threw him on the ground, pointed a firearm at him, and said, “[S]top or I will shoot you.”⁵⁵

Similarly, in the detention centers, one pregnant minor, held with other pregnant young women and infants, reported that Border Patrol agents insulted the women, accusing them of coming into the United States to “contaminate this country” with their children. In another report, a mother reported that after her infant soiled his pants, the agents threw the pants in the trash, then failed to provide the infant with another diaper or pair of pants. The child eventually became sick in the extremely cold cell.⁵⁶

Example after example of abuse illustrates a pattern of abuse and neglect at each stage of the immigration process, from apprehension to detention and removal:

- Denied a pregnant minor medical attention when she reported pain, which preceded a stillbirth

- Subjected a sixteen-year-old girl to a search in which they “forcefully spread her legs and touched her private parts so hard that she screamed”
- Left a four-pound premature baby and her minor mother in an overcrowded and dirty cell filled with sick people, against medical advice
- Threw out a child’s birth certificate and threatened him with sexual abuse by an adult male detainee
- Ran over a seventeen-year-old with a patrol vehicle and then punched him repeatedly⁵⁷

Regrettably, these abuses have continued under the current presidential administration, including:

- Groped a fifteen-year-old girl, pulling down her underwear and reaching inside her bra⁵⁸
- Removed bedding when a sixteen-year-old complained about the taste of water and food they were given, leaving the child to sleep on cold concrete⁵⁹
- Spent weeks in freezing temperatures⁶⁰
- Deployed tear gas into a crowd of migrants, with women and small children present⁶¹
- Sexually assaulted two women, one of them a minor, in a closet⁶²

Worse still, in each of the past four years, more than a thousand unaccompanied migrant children reported being sexually abused while in U.S. custody.⁶³ The abuse and neglect can be life-threatening. In early 2020, a sixteen-year-old boy arrived at a federal processing center with a 103-degree fever and the flu.⁶⁴ A nurse recommended a re-evaluation and hospitalization if his condition worsened. Instead, Carlos Gregorio Hernandez Vasquez was left without care and became the sixth migrant child to die in CBP care during the Trump Administration.⁶⁵ CBP says Mr. Hernandez Vasquez was discovered during a wellness check.⁶⁶ Video footage discredits this account, showing Mr. Hernandez Vasquez collapsing on the floor, twitching in discomfort until his body lay still, only to be discovered four hours later by his cellmate.⁶⁷ Horrifically, journalists discovered a secret Facebook group with roughly 9,500 former and current Border Patrol agents.⁶⁸ In this group, members joked about Mr. Hernandez Vasquez’s death.⁶⁹

IV. Recent Developments

The absence of enforced standards and effective oversight leading to the abuse and deprivation of many immigrant children has been compounded by extremely concerning policy decisions of the current presidential administration. In order to dissuade family immigration, President Trump’s administration enacted a zero-tolerance policy that included family separation in May 2018. More than 2,500 children were reported to have been forcibly separated from their parents. The real number is estimated by many to be higher, as there is little oversight for accurate tracking.⁷⁰ A September 2019 HHS OIG report noted that intense trauma was common among children who entered care provider facilities.⁷¹ President Trump’s family-separation policy added to this trauma: “[s]eparated children experienced heightened feelings of anxiety and

loss as a result of their unexpected separation,” and some children even “expressed acute grief that caused them to cry inconsolably.”⁷² The HHS Office of Inspector General reported in 2020 that lack of notice of the policy, poor interagency communication, and internal management decisions led to a failure to protect children’s interests.⁷³ Specifically, separated children could not be placed in care provider facilities within seventy-two hours (as required by the *Flores Settlement*), “leaving hundreds inappropriately detained” in DHS custody.⁷⁴

In response to outcry, President Trump issued an executive order in June 2018 stating that he would end the family separation procedure; however, the order stated that the Attorney General would file a request in federal court to amend the *Flores Settlement* to allow the detention of “alien families together throughout the pendency of criminal proceedings for improper entry or any removal or other immigration proceedings,” essentially allowing immigrant families to be detained together indefinitely.⁷⁵ In September 2019, a federal judge in a California district court blocked new regulations that would allow the indefinite detention of families, as being “inconsistent with” the *Flores Settlement*, and refused to amend the *Settlement*.⁷⁶

Finally, one particularly troubling development that poses a threat to oversight and accountability is President Trump’s recent designation of CPB as a “Security Agency.”⁷⁷ This is the same classification afforded to “highly secretive” agencies such as the Secret Service and the Federal Bureau of Investigations (FBI). This means that CPB employee data, including names and positions, is now immune to FOIA requests and other required public disclosures. This step will no doubt drastically reduce transparency and prove to be yet another chip away at existing DHS accountability mechanisms.

V. Concluding Remarks and Recommendations

In this letter, we have aimed to draw attention to the U.S.’s institutional framework and legal obligations around migrant children, and the ways in which the accountability bodies are currently failing to reign in the numerous abuses that migrant children face in detention. These abuses, and the breakdown of oversight, have only worsened under President Trump. We urge the adoption of several mechanisms, which we believe are necessary to curb these abuses and improve oversight:

- Reform of external accountability mechanisms, including but not limited to, more efficient OIG investigations, with mandatory completion and remedies in ninety days or under, and the statutory authority to discipline or remove individuals for misconduct.
- Clearer and more demanding standards for hiring ICE and CBP officers aimed at identifying potential offenders and including stringent background checks.

- Clear sanctions, enforced through DOJ or individual claims before Article III (federal) courts, for failure to transfer children to HHS custody within seventy-two hours.
- More funding and resources for HHS to provide intensive, individualized care processes for migrant children with accountability mechanisms to ensure effective use of added resources.
- Greater independence (from ICE and CBP) for CRCL and the direct ability to sanction and remedy reported abuses.
- Require accurate record-keeping from DHS agencies to allow for more robust and impactful investigations.
- Train all CPD/DHS employees on human rights, immigration law, and empathy with particular attention to sexual or gender-specific abuse,⁷⁸ especially given the OIG’s goal to “develop, coach, and mentor [its] workforce”.⁷⁹
- Revoke CPB’s designation as a “Security Agency” to reintroduce transparency necessary to create changes and report abuses.

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¹ This submission was drafted by Isaac Ashworth and Rachel Lebowitz, law students in the International Human Rights Clinic (IHRC) of the University of Chicago Law School, under supervision by faculty Claudia Flores and Nino Guruli on behalf of IHRC. For more information about the detention of immigrant children in U.S. custody, see University of Chicago Law School – International Human Rights Clinic, *Neglect and Abuse of Unaccompanied Immigrant Children by U.S. Customs and Border Protection*, International Human Rights Clinic, 7 (2018), https://www.dropbox.com/s/lplnnufjbwci0xn/CBP%20Report%20ACLU_IHRC%205.23%20FINAL.pdf?dl=0.

² University of Chicago Law School – International Human Rights Clinic, *Neglect and Abuse of Unaccompanied Immigrant Children by U.S. Customs and Border Protection*, International Human Rights Clinic, 7 (2018), https://www.dropbox.com/s/lplnnufjbwci0xn/CBP%20Report%20ACLU_IHRC%205.23%20FINAL.pdf?dl=0. Various news outlets have written about the report. See, for example, Alison Bowen, *Abuse of Immigrant Children Alleged in Documents Examined by Chicago Law Students*, Chicago Tribune (May 30, 2018), <https://www.chicagotribune.com/news/sc-fam-immigrant-children-abuse-0605-story.html> [https://perma.cc/XZV4-D6GT]; Antonio Olivo, *ACLU Alleges That Immigrant Minors Were Mistreated in Custody during Obama Years*, Wash. Post (May 23, 2018), https://www.washingtonpost.com/local/social-issues/aclu-immigrant-minors-routinely-mistreated-in-custody-during-obama-years/2018/05/23/b7cb31a8-5e00-11e8-a4a4-c070ef53f315_story.html [https://perma.cc/P4PV-6XFJ]; Richard Gonzales, *ACLU Report: Detained Immigrant Children Subjected to Widespread Abuses by Officials*, NPR (May 23, 2018), <https://www.npr.org/sections/twotwo-way/2018/05/23/613907893/aclu-report-detained-immigrant-children-subjected-to-widespread-abuse-by-officia> [https://perma.cc/8JY8-ZGFW]; See also Garrett M. Graff, *The Border Patrol Hits a Breaking Point: Behind This Week’s Migrant-Center Horrors Lies an Agency Plagued by Years of Dysfunction—and Trump Is Only Its Latest Problem*, Politico (July 15, 2019), <https://www.politico.com/magazine/story/2019/07/15/border-patrol-trump-administration-227357> [https://perma.cc/G7AD-X89A].

³ See generally UN General Assembly, *Protocol Relating to the Status of Refugees*, Jan. 31, 1967, United Nations, Treaty Series, vol. 606, p. 267, <https://www.refworld.org/docid/3ae6b3ae4.html>.

⁴ Pub. Law 96-212.

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- ⁵ Pub. Law 96-212, 94 Stat. 105. To be granted asylum status, an applicant must be determined to be a refugee. 8 U.S.C. § 1158(b)(1)(A).
- ⁶ Pub. Law 96-212, 94 Stat. 112.
- ⁷ UN General Assembly, *Protocol Relating to the Status of Refugees*, Art. 10.1.
- ⁸ UN General Assembly, *Protocol Relating to the Status of Refugees*, Art. 24.1.
- ⁹ See *Fourth Periodic Report of the United States of America to the United Nations Committee on Human Rights Concerning the International Covenant on Civil and Political Rights* at ¶¶ 431–33, U.S. Dep’t. of State (Dec. 30, 2011), <https://2009-2017.state.gov/j/drl/rls/179781.htm> [<https://perma.cc/VE5M-A2JM>].
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- ¹⁵ 8 U.S.C. § 1357(a)(1)–(2) (2006).
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- ¹⁷ *Unaccompanied Alien Children*, U.S. Dept. of Health & Hum. Servs., Admin. for Child. & Fam. Office of Refugee Resettlement, <https://www.acf.hhs.gov/orr/programs/ucs> [<https://perma.cc/C4W8-CCQE>]; see also *Children Entering the United States Unaccompanied: Section 1—I.2 ORR Standards for Placement & Transfer Decisions*, Office of Refugee Resettlement (Jan. 30, 2015), <https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied> [<https://perma.cc/56P8-E247>].
- ¹⁸ Stipulated Settlement Agreement, *Flores v. Reno*, No. CV 85-4544-RJK (Px) (C.D. Cal. Jan. 17, 1997) [hereinafter the *Flores Settlement*], https://www.aclu.org/sites/default/files/field_document/flores_settlement_final_plus_extension_of_settlement011797.pdf.
- ¹⁹ *Id.* at ¶ 12.A.
- ²⁰ *Id.* ¶ 11; see also 8 U.S.C. § 1232(c)(2) (2013).
- ²¹ See BBC, *Are US Child Migrant Detainees Entitled to Soap and Beds?*, BBC (June 20, 2019), <https://www.bbc.com/news/world-us-canada-48710432> [<https://perma.cc/PHR3-WU4K>].
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- ²³ 22 U.S.C. 7101 et seq.
- ²⁴ 22 U.S.C. 7105(c)(1).
- ²⁵ Pub. L. No. 110–457.
- ²⁶ Kandel, *supra* note 13 at 4–5.
- ²⁷ *Id.* at 4.
- ²⁸ 34 U.S.C. § 20341(b)(6) (2018) (designating law enforcement and detention facility employees as “covered professionals” subject to VCAA reporting requirements).
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- ³² Office of Inspector General, *Frequently Asked Questions*, DHS, <https://www.oig.dhs.gov/about/faqs> [<https://perma.cc/H725-DLMU>]. All audit and inspection reports are publicly available on the OIG website. *Id.*
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- ³⁴ Office of Inspector General, *Strategic Plan FY18–FY19 *5–6*, DHS, <https://www.oig.dhs.gov/sites/default/files/OIG-Strategic-Plan-FY18-19.pdf> [<https://perma.cc/M95H-XAWY>].

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- ³⁶ Office of Inspector General, *Frequently Asked Questions*, *supra* note 32.
- ³⁷ Nick Miroff, *DHS Inspector General's Office Nearly Dormant Under Trump as Reports and Audits Plummet*, Wash. Post (Mar. 17, 2020), https://www.washingtonpost.com/national/homeland-security-inspector-general-weakened/2020/03/17/c3269ea6-6309-11ea-912d-d98032ec8e25_story.html [<https://perma.cc/228X-V9L5>].
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