

Program Evaluation

Children's Holistic Immigration Represetation Project

September 2022-August 2024



Prepared by

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Acknowledgements

This project began at the Vera Institute of Justice where the initial stages of planning and research design occurred. The evaluation project, "Implementation Evaluation of the Children's Holistic Immigration Representation Project (CHIRP)," was approved after initial review by the Vera Institutional Review Board in December 2022. Becca DiBennardo, Senior Research Associate at Vera, was Principal Investigator (PI) at the start of the project, followed by Nina Siulc, Director of Research Initiatives. Both worked closely with Athena Wong while she was employed at Vera before coming to Acacia, along with the grant, in 2023. At Acacia the project also benefited from the guidance of Michael Danielson, Director of Research and Evaluation, and Jonathan Beier, then Principal Research and Evaluation Manager, both of whom served as PIs. Emily Bartholomew, Associate Program Director of CHIRP and Jeanette Lomeli, Senior Program Associate for CHIRP, both provided invaluable feedback and programmatic guidance. Jill Williams was the final PI on the project and worked with Athena Wong, who was deeply involved with all aspects of the project from start to finish, to complete the analysis and write the final evaluation.



Executive Summary

Since 2019, over 532,000 unaccompanied children have entered the United States and been released to sponsors while their immigration cases are adjudicated. Over 56,000 of these children were released in the state of California, which has received the second highest number of unaccompanied children released from federal immigration detention of any state nationally. In 2021, the California Department of Social Services awarded Acacia Center for Justice a \$13.4 million grant to support a pilot project focused on increasing unaccompanied children's access to holistic legal representation. Since then, the *Children's Holistic Immigration Representation Project (CHIRP)* has provided nearly 700 unaccompanied children with access to integrated teams of social service and legal staff who support their legal cases and overall well-being. This report and program evaluation provides an overview of CHIRP and summarizes key findings from a mixed-methods program evaluation conducted by members of Acacia's Research, Evaluation, and Data Analytics unit.

Evaluation Approach

Acacia conducted a mixed-methods program evaluation to answer the following questions:

- To what degree did the program <u>expand access</u> to holistic immigration legal services for unaccompanied children in California?
- 2) What is the impact of the program within subgrantee organizations?
- 3) What is the impact of the program on client experiences?
- 4) What are the **facilitators and barriers/challenges** to program implementation?
- 5) What factors affect the transferability, scalability, and sustainability of the program model?

The evaluation answers these questions using three data sources 1) quantitative data on services rendered, which is submitted by subgrantees into a secure database; 2) qualitative data obtained through individual and group interviews; and 3) qualitative and quantitative data collected via an electronic survey distributed in August 2024 focusing on the experiences and perspectives of CHIRP staff. Thirty-one unique individuals (29 CHIRP staff and 2 program administrators) participated in interviews and 46 individuals responded to the culminating survey. Due to time constraints and ethical considerations, data was not collected directly from the children served. Rather, information on the impact the project had on client experiences and services rendered was obtained from direct service providers.



Key Findings

- The project is successful at increasing unaccompanied children's access to holistic legal representation. Nearly 700 unique children from 26 counties received holistic legal representation between September 2022 and August 2024. The project also served as a gateway for 8 legal service providers to integrate social services into their organizations for the first time and for 8 additional organizations to deepen the way in which social and legal services are integrated. Providers additionally shared that access to additional funding streams to support this work is extremely limited, highlighting the foundational role CDSS plays in providing unaccompanied children access to holistic legal representation.
- ❖ The project increases the degree to which trauma informed practices are integrated into the everyday practices and policies of participating legal service providers (LSPs), while also having a positive impact on the work life of LSP staff. This suggests that the project not only improves the way in which clients are engaged and supported by LSPs, but also that it supports staff experiences and retention in the field.
- CHIRP increases children's access to a greater range of services and deepens the amount of support they receive by ensuring that social and legal service staff are equally supported and able to focus on the roles most appropriate to their training and expertise.
- The project improves the quality of legal representation children received and allows social service staff to follow-up with children more frequently to ensure they are able to access needed services and have the support needed to navigate challenges as they arose.
- CHIRP increases children's access to trusted adults who they can turn to for support when challenges arise, while also supporting youth's integration into their sponsor's homes and the larger community.
- CHIRP improves client engagement and fosters agency among children served, improving the degree to which they are actively engaged in their cases and equipping them to advocate for themselves in their legal cases and lives more broadly.

Conclusions and Recommendations

Evaluation data indicates that CHIRP is successful at achieving its goal of increasing unaccompanied children's access to holistic legal representation, while also positively impacting immigrant legal service provider organizations and staff and improving the quality of services rendered. As CDSS considers sustaining or expanding the project, key factors that should be considered include:

Workforce Development Challenges: Hiring both social service and legal service staff proved to be challenging and is reflective of the overarching context of workforce development in these



fields nationally and in the state of California in particular. This context should be considered when making decisions regarding salary ranges, fundable labor categories, and if funding is distributed through temporary/time-limited or permanent funding mechanisms.

- Supervisory and Support Staff: The delivery of holistic legal services relies upon adequate training, supervision, and support. CDSS should consider the foundational role these individuals play in ensuring high quality service delivery when developing programmatic and funding guidelines.
- Technical Assistance: Providers noted the key role technical assistance, such as facilitated processing groups, and other supports, such as the external clinical supervisor for social workers working towards licensure, played in shaping their interest in participating in the project and successful implementation. If CHIRP is sustained or expanded, robust technical assistance should continue to be funded and provided to support the entry of new organizations into this model of service delivery and client support.
- Case Length, Caseload Management, and Quality Service Delivery: The extensive backlog in the US immigration system results in significant delays for children's cases to be adjudicated and finalized. Ensuring children have access to holistic legal services during the full lifecycle of the case is critical. At the same time, case length combined with the high number of children in need of holistic legal services necessitates an evaluation of the degree to which holistic teams can take on new cases while older cases are pending; all while ensuring the continued delivery of high-quality services and avoiding staff burnout. More research is needed to understand different models of caseload management and the impact they have on services delivered, clients, and staff.



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Introduction

Between Federal Fiscal Years (FY) 2019 and 2024, over 650,000 unaccompanied children¹ entered the United States fleeing persecution, violence, and poverty in search of a better life.ⁱⁱⁱ After being apprehended by the Department of Homeland Security, unaccompanied children are transferred to the care and custody of the Office of Refugee Resettlement (ORR), and most are released to sponsors—adults deemed suitable "to provide for the child's physical and mental well-being and who have not engaged in any activity that would indicate a potential risk to the child"—across the country.ⁱⁱⁱ Between FY 2019 and 2024², over 532,000 unaccompanied children were released nationally, 56,000 of whom were released to sponsors in the state of California, the second highest number for any state.^{iv}

Table 1. Number of Children Released to Sponsors in the State of California by Fiscal Year

Fiscal Year (Oct-Sept)	Number of Children Released in California	Proportion of All Unaccompanied Children Released Nationally
2019	8,447	12%
2020	2,225	13%
2021	10,770	10%
2022	13,730	11%
2023	11,121	10%
2024 (through August)	10,122	11%
Total	56,415	11%

In California, the most common destination counties for unaccompanied children were Los Angeles, Alameda, San Mateo, Orange, and Riverside, which together accounted for about 60% of children released within the state from FY 2019 through August 2024. Substantial numbers of children were also released to regions less accustomed to receiving them. For example, in FY 2023, 378 children were released to sponsors living in counties that each received fewer than 50 children over the entire fiscal year. That means that some children are released to and living in places where they may have less access to needed resources compared to children living in places with longer and more established histories receiving unaccompanied children.

¹ Unaccompanied children are legally defined as individuals who have no lawful immigration status, are under 18 years old, and have no parent or guardian immediately available to provide care and custody when they enter the United States. Throughout this evaluation report the terms child, youth, and client are all used to refer to clients who were eligible to or received services under the project and who meet the legal definition of an unaccompanied child.

² The Office of Refugee Resettlement (ORR) provides unaccompanied children data by federal fiscal year (October 1 — September 30) but publishes data on a monthly cadence with a 2 to 3 month delay in reporting. FY24 data available as of mid-October 2024 includes children released to sponsors through August 2024, corresponding to the end of the service period funded during the pilot period (9/1/22-8/31/24).



Most unaccompanied children have viable legal options that would allow them to remain in the United States. However, pursuing these forms of relief is nearly impossible without support from a trained attorney. This leads to significant disparities in case outcomes based on whether or not a child has representation. For example, children with legal representation are 7 times more likely to receive a legal outcome that allows them to remain in the United States compared to children without representation. Yet, the most current data available from the Department of Justice (DOJ) indicates that 43% of unaccompanied children do not have legal representation. Increasing access to legal representation is critical to uphold unaccompanied children's right to due process and ability to pursue relief from deportation.

At the same time, emerging research indicates that legal representation alone is insufficient to ensure that unaccompanied children can successfully integrate and thrive in communities while navigating the complex US immigration legal system^{ix}, a process that most often takes many years.^x Rather, social service professionals are crucial to ensuring that children feel safe to share the deeply personal information needed to advance their legal cases and are able to access services such as housing assistance, food access, school enrollment, and mental and physical healthcare—services that are foundational to their basic well-being.^{xi}

Program Structure and Implementation

In 2021, the State of California recognized the need to expand unaccompanied children's access to legal representation and the inadequacy of current models and funding streams. As such, the California Department of Social Services (CDSS) allocated \$13.4 million dollars for the Children's Holistic Immigration Representation Project (CHIRP)⁴ with the pilot service period running between September 1, 2022 to August 31, 2024. CHIRP's aim is two-fold: 1) to expand unaccompanied children's access to holistic legal services, consisting of support from both social and legal services professionals, and 2) to promote holistic legal representation as a best practice for representing unaccompanied children.

Structure of the Holistic Model

Holistic legal services are defined under CHIRP as social and legal services delivered by an integrated team of providers who work in collaboration toward a shared advocacy plan in support of the client. Under CHIRP, legal service providers (LSPs) established holistic representation teams

³ The Transactional Research Access Clearinghouse (TRAC) at Syracuse University, which receives EOIR data under the Freedom of Information Act, contends that EOIR data beyond 2017 are deficient and that all statistics reported based on this data should, in turn, be viewed with a level of skepticism (https://trac.syr.edu/immigration/reports/669/). We include this data point here recognizing the flaws in the data alongside the reality that this is the best available current statistic on legal representation for unaccompanied children.

⁴ CHIRP is also referred to as the Immigration Legal and Social Work Services (ILSWS) project.



that include **equal ratios** of social and legal service staff who work together to support a single caseload of clients. CHIRP operates on a universal representation model where cases are taken on a first-come-first-serve basis without regard for the perceived merits of the case. CHIRP aims to advance an approach to universal representation where no child is left to defend themselves in immigration proceedings, but rather has an interdisciplinary team of zealous advocates who can work to address both their legal needs and external challenges related to their legal case and/or overall well-being.

Eligibility for CHIRP was limited during the pilot period to unaccompanied children who were transferred from the Department of Homeland Security to the care and custody of the federal Office of Refugee Resettlement (ORR); were present in California, whether in ORR custody or residing with a family member or other sponsor⁵; and were under 21 years of age when legal representation was initiated.⁶ Based on Acacia's prior knowledge and expertise administering legal access and representation programs for unaccompanied children, caseload requirements were set to 30-35 clients per holistic team.^{xii}

The Social Services Component

Because of the diverse range in experience, education, and skills among providers in the social service field, Acacia recommended using the broad labor categories of "social workers" and "case managers". The labor category of "social worker" includes staff with Masters in Social Work (MSWs), Licensed Clinical Social Workers (LCSWs), and Doctorates of Social Work (DSWs), while the labor category of "case manager" includes staff with Bachelors of Social Work (BSWs) or equivalent experience. Given the challenges to hiring social service professionals in the legal non-profit sector, Acacia recommended that subgrantees take an expansive approach during recruitment and consider both the professional social service experience the candidate has, as well as lived experiences, when evaluating a candidate's ability to effectively fill a role.

With these labor categories in mind, Acacia determined that the scope of work for the social service staff to include: conducting needs assessments; providing appropriate referrals or "warm handoffs" to community resource; accompanying clients to social service appointments and court hearings; serving as the child's advocate in other systems external to the case that nonetheless impact the child's overall well-being; delivering psychoeducation, social-emotional support, motivational interviewing, and positive coping skills; supporting families through the reunification process; developing letters of support or other written documentation to support the legal case; and supporting the development and integration of child-friendly and trauma-informed practices in the

⁵ This is consistent with the Welfare and Institutions Code (WIC) Sections 13300-13302, whereby the CDSS can provide grants to qualified nonprofit legal service organizations to provide legal services to eligible unaccompanied children.

⁶ The grant allows for social services to be initiated after youth turn 21 years of age.



organization. While subgrantees can hire a licensed clinical social worker, the scope of work for the social service staff does not include providing clinical therapy services.

The Legal Services Component

The grant requires subgrantees to provide full-scope legal services for unaccompanied children that include but is not limited to the filing of, preparation for and representation in administrative and/or judicial proceedings for the following immigration statuses: Asylum, T-Visa, U-Visa, Voluntary Departure, Special Immigrant Juvenile Status (SIJS), or other immigration remedies available. LSPs deliver culturally and linguistically appropriate legal services provided by attorneys, accredited representatives, paralegals, interpreters and other support staff for state court proceedings, federal immigration proceedings, and/or any appeals arising from those proceedings.

Program Implementation

Sixteen subgrantees participated in the project during the pilot period. To prepare for project implementation, subgrantees recruited and posted positions for the project, mapped out supervision and support structures, and thought through policies and procedures that would support an integrated social and legal services team. Since many subgrantees did not have prior experience integrating social services or social service staff into their legal representation programs, during the application process, program administrators sought feedback from subgrantees about any anticipated challenges to promoting and integrating social services in their work. The anticipated challenges LSPs identified included:

- Effective practices to facilitate collaboration between social and legal services staff
- Protocols around mandatory reporting for social service staff
- ❖ Appropriate sources of supervision and support for social service staff
- * Recruitment and retention of social service staff

To support the subgrantees and help ensure project success, program administrators provided focused technical assistance support around these topics. This included providing education and guidance around two different integration models. In the first model, the social service staff member "is part of the legal team," and thus protected by attorney-client privilege and not a mandated reporter. In the second model, the social service staff member is a mandated reporter and not protected by the attorney-client privilege. During the onboarding period of the grant, program administrators regularly held meetings with subgrantees to guide them in integrating a social service professional into their work and discussed best practices for holistic legal representation.



Evaluation Approach and Methods

Members of the Research, Evaluation, and Data Analytics (REDA) team at the Acacia Center for Justice (Acacia) were tasked with evaluating CHIRP during the pilot period. The evaluation of CHIRP provides insight into the process of implementing the project model; illuminates the immediate apparent benefits to legal service providers and children receiving services under the model; and identifies key factors that should be considered when sustaining or expanding this project. Due to the 2-year timeline and pilot nature of the project, the evaluation was not able to assess large-scale or long-term impacts of the project. Rather, the evaluation addresses the following questions:

- To what degree did the program <u>expand access</u> to holistic immigration legal services for unaccompanied children in California?
- 2) What is the impact of the program within subgrantee organizations?
- 3) What is the impact of the program on client experiences?
- 4) What are the **facilitators and barriers/challenges** to program implementation?
- 5) What factors affect the transferability, scalability, and sustainability of the program model?

Quantitative and qualitative data were collected through three primary mechanisms to answer these questions. First, subgrantees entered information on children served and services rendered into a secure database. Data collected included: demographic information of children enrolled in the program; county of residence at case initiation; dates of service initiation and closure and associated reasons; substantive legal filings, motions, and appeals by type and date; court hearings and appearances by type, date, and staff in attendance; social service referrals and accompaniments by type and date; and legal supporting documentation developed by social service staff by type and date. Data was collected at the individual client level to allow for assessment of the number of unique clients served and services rendered. Providers entered information into the database and participated in data validation with the Research and Evaluation Associate assigned to the project on a monthly cadence to ensure reporting accuracy. Information on services delivered and clients served was shared with CDSS in quarterly reports.

Second, qualitative data was collected from all subgrantee organizations and program administrators via individual and group interviews. Interviews lasted between 30 and 75 minutes and were conducted either via Zoom or in-person in conjunction with the onsite training program. In one instance a subgrantee chose to respond to interview questions via email instead of participating in a live interview. Overall, 10 legal staff, 13 social service staff, 7 program managers, and 2 program administrators participated in these interviews.⁷

⁷ During the pilot period, 3 of the 40 budgeted CHIRP FTEs were never filled by permanent staff.



Table 2. Interview Type, Timeframe, and Participant Count

Interview Type	Timeframe	Number of Staff	Number of Subgrantee Organizations
Group interviews	March 2023	12	8
Individual interviews October-November 2023		14	9
In-person interviews	June 2024	7	4
E-mail response	June 2024	N/A ⁸	1

Table 3. Interview Participants by Staff Type⁹

Staff Type	Group	Individual	In-person	Total
Legal service	2	4	4	10
Social service	8	6	2	16
Program manager	2	4	1	7
Program administrator		2		2

A total of 31 unique individuals participated in interviews, with some LSP staff participating in both individual and group interviews.

Interviews were semi-structured, with a question guide serving to align and narrow interview foci but also allowing for conversations to proceed naturally (see Appendix C). This allowed participants to raise and elaborate on the issues they identified as most salient. Interviews addressed: recruitment and hiring; program implementation including facilitators and barriers; impact of the project on subgrantees, staff hired, and youth served under the project; impact related to technical assistance; and considerations for sustaining and expanding CHIRP in California. Group and individual interviews conducted via Zoom were recorded and transcribed; in-depth notes were collected during interviews conducted in-person.

Third, a culminating survey was distributed to subgrantees in August 2024 to gather reflections related to the evaluation questions. This survey was designed to collect quantitative and qualitative data on the barriers and facilitators to program implementation and the impact of the project on the subgrantee organizations, staff hired, and youth served under the project. Surveys were completed by 46 individuals including 16 legal service staff, 15 social service staff, and 15 program managers. At least 1 person from each subgrantee organization completed the survey. In some instances, survey questions were targeted to only a subset of respondents based on their position and role on the project. For example, program managers were asked to provide information on the barriers

⁸ Response to interview questions received via email was provided on behalf of the collective CHIRP team at the organization.

⁹ Four LSP staff participated in both group and individual interviews, the total number of unique LSP staff who participated in interviews is 29. Of these 4 LSP staff, one was social service staff at the time of group interviews and was a program manager at the time of individual interviews. Two program administrators also participated in interviews.



and facilitators to implementation, while social and legal services staff were asked about the impact of the program model on the services they provided clients (see Appendix C).

Analysis Procedure

For evaluation purposes, quantitative data on the number of children served, their demographic characteristics, geographic distribution, and the range and quantity of services provided was exported from the secure database, cleaned, and analyzed to produce descriptive statistics on program activities and children served. While the database allowed for information to be pulled and analyzed at the scale of individual subgrantee organizations, this evaluation focuses primarily on assessing the overall impact of CHIRP as a network.

Quantitative responses (e.g., 5-point Likert scale questions) from the culminating survey were analyzed to produce means, medians, and standard deviations (<u>see Appendix B</u>). This was used to assess the overall sentiment expressed across respondents, while also identifying any significant variation in responses that might point to site-level or individual-level variations in experience or perspective.

Qualitative data from interviews and the culminating survey was coded and analyzed to identify common themes and variations across responses. General codes were developed based on the evaluation questions and informed by existing research and knowledge held by members of the evaluation team from participation in program-related activities and meetings. Codes were iteratively refined throughout the analysis process. The significance of qualitative insights garnered from subgrantee respondents was assessed in two ways. First, significance was attributed based on the prevalence with which themes emerged across the full sample—these insights speak to common themes and experiences. Second, significance was also attributed to statements made by a single or few respondents if that data suggested an issue or experience that appeared to be particularly important or pressing based on 1) the importance attributed by the respondent or 2) because members of the evaluation team identified the comment to be significant based on how it related to overarching project goals. This allowed us to identify issues that may be less prevalent but still notable for considering the impact, sustainability, scalability, and transferability of the model.

Quantitative and qualitative data were triangulated to produce more robust and nuanced evaluation insights. For example, qualitative data from interviews helped to contextualize quantitative metrics on the barriers and facilitators of project implementation obtained through the survey. Due to resource and time constraints as well as ethical considerations, qualitative data was not collected

¹⁰ While the organizational affiliation of interviewees was recorded and used to analyze the degree to which sentiments were expressed across participating organizations, resource constraints limited the ability to engage in in-depth analysis of variations across participating subgrantee organization and factors that may have contributed to these variations. Variations are identified throughout the report so that they may inform future evaluations.



directly from children served under the program. Instead, providers were asked to share their perceptions of the impact of the project on children served and to provide explicit examples of impacts that they observed.

Access to Holistic Immigration Legal Services

The primary goal of CHIRP is to expand access to holistic legal services for unaccompanied children in California. During the grant period, **698 unique children** received services under CHIRP. While we do not have access to data that allows us to speak to the degree to which CHIRP reached children who otherwise would not have been able to access legal representation or social service support, evaluation data does indicate that CHIRP is successful at increasing children's access to holistic legal representation. As previously noted, 16 organizations participated in CHIRP during the pilot period – 14 organizations were funded for both social and legal services and 2 organizations were funded for social services, with legal services provided to clients through other funding sources at those LSPs.

Prior to participation in CHIRP, only half of the organizations offered any in-house social services and none of the 16 LSPs offered integrated and universal social services and legal representation to the same degree as that provided under CHIRP.

Common models of holistic representation (in immigration and other fields) generally have unequal and lower ratios of social service professionals to legal staff and provide clients with social services on a triage basis.xiii Some research suggests that in holistic representation models where there are lower ratios of social workers to attorneys, clients receive social services based on initial assessments of client needs and social service workers' limited capacity, reducing the overall number of clients who receive social service support to only those who demonstrate significant need.xiv.11 Because of low ratios of social service workers to legal staff, a single social service worker is often in a position of receiving referrals from upwards of 5-8 different attorneys.xv This creates structural limitations where only a small proportion of clients receive comprehensive social service support.

The one-to-one holistic representation model piloted under CHIRP is unique in that the project aims to provide clients universal access to both legal representation and social services, regardless of immediately apparent "need." Program data indicates that over 99% of children served

¹¹ Some LSPs in the Unaccompanied Children's Program network that provide immigration representation for unaccompanied children were interviewed by the Children's Immigration Law Academy (CILA) for the "Collaborative Efforts to Immigration Relief: A Call for Integration of Social Workers + Lawyers" resource and shared that their approach to incorporating social services with legal representation involved lawyers making referrals for clients to receive further support from social service staff.



received both legal and social services during the pilot period. 12,13 As discussed further in the impact on client experiences section, providing universal access to social services allows CHIRP-funded LSP staff to better identify social service needs (e.g., mental and physical health needs, housing assistance, school enrollment) among children who do not initially present as particularly vulnerable or having high needs for services.





Together, CHIRP LSPs serve 27 counties¹⁴ (see Figure 1) and reached clients in 26 counties. This includes 15 of the top 20 counties where unaccompanied children who were previously detained in ORR custody were released during the pilot period (see Table 4). Most CHIRP LSPs continue to serve clients in the same geographic areas where they have been working before joining the project with the exception of one LSP that expanded service to Marin County, where most of their CHIRP clients resided at case initiation.

¹² The 2 LSPs that received CHIRP funding to provide social services only were not required to report legal representation information to program administrators. The expectation is that all CHIRP clients at these two LSPs also received legal services for at minimum the same duration as their social services.

¹³ At the 14 LSPs funded to provide social and legal services, 3 clients with open legal representation cases are awaiting initiation of social services, as of October 2024. Another 3 clients with closed cases did not receive social services during their time as CHIRP clients due to short case duration, relative timing of their case with social service staff position vacancy, and internal process errors within the LSP. The program administrators have connected with the LSP team that experienced an internal process error to consider adjustments to their protocols and will check that appropriate changes are described in their updated program operation plan to ensure that all CHIRP clients receive both social and legal services.

¹⁴ One LSP made an exception to serve clients from two counties outside of their usual service regions because these clients relocated after representation was initiated. These two counties (Tulare and Sutter) are not included in the total of 27 counties that LSPs serve because this LSP does not routinely receive referrals and clients from these 2 counties.



Table 4. Clients Served by County of Residence at Case Initiation (September 2022 to August 2024)

County	Number of unaccompanied children released in CA	Number of CHIRP clients	Proportion of total CHIRP clients (%)
Los Angeles	7,488	282	40%
Alameda	1,577	108	16%
Marin	507	74	11%
Sacramento	510	52	7%
Riverside	963	35	5%
San Bernardino	747	27	4%
Contra Costa	992	18	3%
San Mateo	1,099	14	2%
Fresno	698	12	2%
Kern	451	9	1%
San Joaquin	449	5	0.7%
Santa Clara	1,019	4	0.6%
Solano	276	4	0.6%
Ventura	390	3	0.4%
Madera	68	2	0.3%
Merced	63	2	0.3%
Santa Barbara	341	2	0.3%
Tulare	135	2	0.3%
Other ¹⁵	4,371	43	6%
Total	22,144	698	100%

Shaded county name cell indicates counties that were in the top 20 counties for the number of children released to sponsors in California between September 2022 to August 2024.

Of all children served under CHIRP during the pilot period (n=698):

- ❖ 50% were 16-18 years of age when they were enrolled for services.
- 89% identify Spanish and 10% identify an Indigenous language as their primary language.
- 49% identify Guatemala, 23% identify El Salvador, and 18% identify Honduras as their country of origin.
- ❖ 55% identify as a man or boy.

¹⁵ Data reported in aggregate for all counties in which only one client reported residence at case initiation during the pilot period except for counties Placer and Yolo. ORR publishes county-level data only for counties/county equivalents where the sponsors live, where 50 or more unaccompanied children have been released as of the time of reporting during the FY. Insufficient data for Placer and Yolo were published during the pilot period to report on these counties individually and therefore data for these counties are combined with the "Other" category. Seven clients each reported residing in Placer (1%) and in Yolo (1%) at the time of CHIRP case initiation.



Importantly, while approximately half of CHIRP clients were 16-18 years old at enrollment, about 18% were between 19-20 years old. While many other programs that fund legal representation for unaccompanied children limit eligibility for youth older than 18 years old, CDSS allowed representation to be initiated under CHIRP up until youth turned 21 years old. This is because they are still eligible for Special Immigrant Juvenile Status (SIJS) - a form of immigration relief that requires certain findings of fact to be made at the state court level before USCIS can adjudicate the application. When programs that fund immigration legal services for unaccompanied youth cap eligibility at 18 years of age, youth who are eligible for relief through SIJS but over the age of 18 are less able to access services and less likely to be granted relief from deportation.

CHIRP participating organizations are required to ask clients about their sexual orientation once they believe a strong enough rapport has been built. Out of the clients who shared their sexual orientation, about 72% identify as straight/heterosexual, more than 3% identify as LGBTQIA2S+, and about 25% prefer not to answer.

Notably, in Summer 2024, six (38%) LSPs reported **no additional funding sources** available to continue social or legal services to clients being served under CHIRP if the project was to be discontinued. Nine (56%) additional organizations noted that they did not have funding available to continue serving a portion of their CHIRP clients if the project was to be discontinued. This could be due in part to the more expansive age eligibility under CHIRP compared to other legal services programs that serve unaccompanied children. This demonstrates the critical role CHIRP plays in expanding access to holistic legal services among SIJS-eligible unaccompanied children in the state of California.

Impact within Subgrantee Organizations

Understanding the impact of CHIRP within subgrantee organizations requires exploring the differing knowledge, beliefs, and approaches LSPs tend to have around holistic representation services. Interviews with program administrators reveal that at least one LSP invited to apply to participate in CHIRP declined, stating that they were not interested because they did not see providing in-house social services as within the scope of their organization's work. While assessing the prevalence of this belief across LSPs is outside the scope of this evaluation, anecdotal evidence suggests that resistance or hesitance related to venturing into the field of social services or holistic representation is not a unique perspective among LSPs who serve unaccompanied children. For example, at a public Acacia webinar discussing how legal service providers can overcome burnout on October 17, 2024, a legal director from one of the CHIRP organizations noted that her organization

¹⁶ Project guidelines did not stipulate an age limit for clients enrolling in social services under the grant. All clients 21 and older at the time of enrollment (2% of all clients served) only received social services under CHIRP funding at one of the two LSPs only funded to provide social services.



had thought about integrating social services for many years, but did not do so until the CHIRP opportunity arose because they did not feel they had the knowledge needed to expand into this realm of work without considerable support. These insights suggest that the integration of social service into the structures and operations of LSPs may require educating LSP staff on the value of the model and increasing access to resources to support the implementation of the model. More research into the beliefs and barriers related to the adoption of holistic service models among LSPs serving unaccompanied children is needed to ensure that resources developed are responsive to the perspectives of organizations.

According to program administrators, CHIRP is unique in the degree of collaboration and equity it requires and supports between legal and social service professionals. According to the Legal Aid Association of California and OneJustice, the ratio of attorneys/advocates to social workers at legal aid organizations in the state averages 8 to 1.xvi This uneven ratio limits the degree to which legal and social services professionals can meaningfully collaborate and implicitly places more value on legal services compared to social services. In contrast, CHIRP operates under a one-to-one ratio of social service to legal staff which fundamentally restructures their working relationship. Moreover, this model both requires and supports a unique degree of collaboration and equity among the integrated team staff as they work to support unaccompanied children.

However, implementing holistic service models and fostering authentic collaborations between staff requires organizations to overcome differences in training, background, and standards.*vii For example, due to a lack of law school training on the psycho-social needs of children and trauma-informed approaches to engaging clients, legal staff often come to this work with limited or no knowledge related to these topics or the role that social service professionals can play to support clients and their legal cases.*viii Similarly, social service professionals who have not worked within the context of a legal service organization must navigate how expectations and service delivery shifts in this context. For example, interviewees from three organizations (19%) explicitly share that providing social services in furtherance of a legal case has different objectives and approaches compared to providing social services with the sole objective of improving client well-being.

Due to the unique challenges and opportunities that integrating social services and implementing a one-to-one holistic model presents to legal service organizations, the evaluation examines the degree to which participation in CHIRP affect participating LSPs. Data from surveys and interviews indicate that participation in the CHIRP network has 5 primary impacts on subgrantee organizations:

1) Participation compels evaluation of differing professional standards and approaches that may improve collaboration and benefit clients.



- Participation expands the integration of trauma-informed practices across organizational practices and policies.
- Participation improves the quality of services rendered and supports staff well-being by allowing for role specialization.
- 4) Participation increases specialized knowledge among social and legal services staff of the needs of unaccompanied children and resources available to them.
- 5) Participation increases knowledge and support of the holistic representation model among LSP staff.

1) Compels Evaluation of Differing Professional Standards and Mandatory Reporting

Differing professional standards around mandatory reporting is a key issue LSPs must consider when implementing holistic representation models.xix Social service professionals are generally mandated reporters — meaning that they must escalate concerns to government authorities if they suspect a client has been harmed or is in danger of being harmed. Conversely, legal service professionals are generally not mandated reporters; rather attorney-client privilege limits the degree to which attorneys can share information disclosed by clients without the client's express waiver of privilege. Under CHIRP, organizations are given the option to include social service professionals in the legal retainer (where they are covered under attorney-client privilege) or to have separate legal and social services agreements that allow them to retain their status as mandated reporters. After considering organizational perspectives, team structure, and staff feedback, 14 (88%) LSPs elected to include social service staff as part of the retainer, making them non-mandated reporters, and two LSPs elected to keep the agreements separate, where social service professionals remained mandated reporters.

The significant change from being a mandated to a non-mandated reporter is difficult for some social service staff to navigate but may also encourage more collaborative and innovative approaches to supporting clients. Social service staff who are not mandated reporters describe proactively developing safety plans, empowering clients to seek and create safety on their own, and consulting with legal staff during crisis situations. These teams may also focus on preventative measures such as helping clients establish strong social support networks and practice effective coping mechanisms which enable safety plans and crisis interventions to be more effective. While assessing the impact of differing approaches to mandated reporting is outside the scope of this evaluation, some interviewees suggested that inclusion of social service professionals under the legal retainer may have a positive impact on the relationship with the client. As one social service program manager explained:



"I think it creates a space that allows trust to build a little bit more quickly. I think that when you describe and you talk about confidentiality... and children and youth really understand what it means, I feel like it's easier for them to open up and disclose information... I also think it makes us work harder and it makes us... be more creative in finding ways to make sure that we're not shirking our responsibility or that we're not leaving a child in a situation that would be harmful for them... that's not the reason to be a non-mandated reporter. We absolutely have the same commitments to making sure that there's safety and security for all of the clients that we work with."

This quotation illustrates that this approach may strengthen rapport with clients and encourage information sharing. This trust building is key to enabling both social and legal services staff to obtain the information they need to effectively support clients' immigration cases and overall well-being. While outside the scope of this evaluation, assessing the impact of differing organizational approaches to mandated reporting can provide beneficial information to LSPs, policy makers, and program administrators interested in expanding holistic service models.

2) Expands Trauma-Informed Practices Across the Organization

Legal service providers report that participation in CHIRP prompted the revision of organizational policies and practices to be more trauma informed. Staff from 2 organizations (13%) report that social service staff have assessed existing intake forms and interview procedures and worked with legal staff to make changes. For example, recognizing that social and legal services staff often need to ask similar questions for their work, many teams began convening joint meetings or more consistently sharing interview notes, case histories and other documents, to limit the number of times clients must discuss traumatic events. Social service staff also provide organizational training on specialized social work or case management topics like transference¹⁷ and countertransference¹⁸, vicarious trauma¹⁹, crisis intervention, safety planning²⁰, and de-escalation strategies. Social service staff advocate for and support organizations in setting up child-friendly and trauma-informed spaces for youth to access during meetings in the office which include the addition of fidget toys and

¹⁷ Transference is a term used in psychotherapy to describe the phenomenon that occurs when a client is directing feelings that are related to someone in their life, e.g. a parent, towards someone who is not that person. For example, a client has trouble working with their service provider because the service provider reminds them of their mother who they had a difficult relationship with. This dynamic may impact the client-service provider relationship and should be explored.

¹⁸ Countertransference is a term used in psychotherapy to describe the phenomenon that occurs when a therapist is experiencing or directing feelings towards a client, e.g. anger, frustration, or favoritism. For example, the client shares details of their past experiences that are similar to difficult experiences that the therapist had. These feelings may impact the client-service provider relationship and should be explored.

¹⁹ Vicarious trauma, also used interchangeably with compassion fatigue, describes the spectrum of physical, emotional and psychological impacts that are experienced by professionals who have prolonged exposure to people's suffering or trauma. ²⁰ Safety planning refers to the process where a social service provider creates a written plan with the client that can be used as a tool to reference when the client is triggered or is feeling unsafe. A safety plan often includes the client's triggers, an overview of their strengths, healthy coping skills that are accessible to the client, and a list of people or hotlines that the client can reach if they are unable to cope with their feelings or establish safety.



weighted stuffed animals. These activities indicate ways in which CHIRP supports the integration of trauma-informed practices across participating LSPs. Additionally, social service staff offer their expertise and advice on how legal staff can more effectively and appropriately engage youth. As one legal staff explained:

"[Once] we onboarded the social services staff, one of the immediate improvements that we made was, instead of me soliciting information from the client just whenever I felt it was convenient. Me talking things out with the social worker, it made much more sense to... give the client their autonomy back. And instead, have them tell me when it's most convenient for them to tell me about their story, not when it was convenient to me but instead when it was convenient to the client. Of course, sometimes deadlines are looming, and they come up, and we actually have to speed through things. But when possible... empowering the client to divulge information when they're ready and when they feel most comfortable. And it's something that... had I not had a social worker there to like educate me on that sort of thing, it's just me as the sole legal rep, bouncing ideas just to myself, I would, to this day, probably still just be calling the clients and asking for information whenever I see fit" (emphasis added).

And another social service program manager elaborated:

....what I've seen is that sometimes... the attorneys, they have an agenda and they want to get to the... necessary information. So, they'll ask name and age and... what school do you go to? And then they'll kind of jump right into like, tell me your history and where were you born? And did you suffer any abuse? So, a social worker will kind of start with building a relationship. Actually, before starting to build a relationship, we'll maybe kind of prepare the client like, this is my purpose, and this is what my role is. ...what I do and what I like to ask my staff to do is even to prepare clients like, some of these questions are going to be really easy and you're going to know the answer really easily and... some of the questions are going to be really hard. And.. a social worker will approach those difficult questions with giving the clients choices like if you're not ready to answer those questions, just let me know. Or if you need to take a break while you're answering my questions, we can take a walk, we can get some water, we can have a **snack break...** in my office all of the social work and social services team, we have fidgety toys and we have weighted stuffed animals. And so, we have tools that we can use to help youth with their anxiety and the difficulty of the questions. We are spreading that out to the attorneys. And so, a lot of the attorneys are incorporating these tools now and we [social service staff] are giving input on the attorney screening forms and questionnaires" (emphasis added).



These quotations illustrate how the integration of social service staff into LSP operations leads to increased collaboration and engagement between social and legal services staff which can foster organizational and individual transformations that promote trauma-informed and client-centered practices at these organizations. CHIRP provides a forum for legal service staff to develop awareness and tools to respect client agency and let clients set the pace for disclosing trauma.

3) Role Specialization Improves Services Rendered and Supports Retention of LSP Staff

It is well documented that immigration attorneys in general and those serving unaccompanied children in particular regularly experience burnout and secondary trauma.** These factors can lead to attrition of critically needed legal staff. While we are unable to examine the longer-term impacts of CHIRP on staff retention, evaluation data suggests that the integration of social service staff into LSP operations at low legal to social services staff ratios can positively impact legal staff and thus support retention in the field.

Unaccompanied children have extensive needs including social and emotional support, integration into the family unit, housing and food security, mental and physical healthcare, and access to education. Prior to CHIRP, legal representatives at participating LSPs often offered piecemeal support for mental health and non-legal needs to clients. While well-intentioned, this support often started and ended with legal representatives researching local resources and passing contact information along to clients. However, legal representatives are not trained in providing social services. When social service professionals are available to support clients, legal representatives are able to hand-off social service responsibilities and focus their full attention to the legal aspects of clients' cases, as explained by interviewees from 6 organizations (38%). In some instances, social service staff also engage in activities central to advancing legal cases, such as writing letters of support as well as gathering health records and education documents. These findings demonstrate that having a one-to-one ratio of social service professionals and legal representatives on the holistic representation team results in increased time and mental capacity for legal representatives to focus on the legal aspects of the immigration case.

Prior to working on CHIRP, some legal representatives felt that no matter how hard they worked, there was always more work to be done because they could not provide the type of robust social services support that many clients needed. Legal staff from 6 organizations (38%) share that the addition of social service professionals to the integrated team under CHIRP makes them feel confident that clients are receiving sufficient support for their comprehensive needs, including during crisis situations. CHIRP allows legal representatives to be in close communication with social service staff to follow the progress of clients in accessing needed services, which further contributes to their



peace of mind. In addition, social service staff offer support to both clients and legal representatives to process trauma during and after client interactions. Social service staff at several participating LSPs led trainings on self-care, coping mechanisms, breathing exercises, and other practical tools that staff can use to support their mental health. As one legal service program manager explained:

"I cannot emphasize enough how transformational it's been to have [support from the case manager], I think because people who are not in immigration practice often don't understand, like it's very hard to articulate and convey that the nature of the relationship that an attorney and client have. You can't sort of assert a clear boundary and just contain everything to, we're only going to talk about your legal case here and other things you have to find someone elsewhere to talk to about them, because the legal case demands that you dig deep into the trauma... I mean one just very pronounced example... was... two siblings who were just, had really just fallen apart crying in a meeting. And it was so intense, and we couldn't, we had had a whole plan of questions we were going to ask, and we had to just put that aside and [the case manager] really took over. And I think that the clients were so responsive and so contained by her... working with them on breathing exercises and working with them on, you know, coping mechanisms for when these intrusive thoughts happen or just when they're kind of processing their past trauma. But also, it was incredibly containing for the legal team. For myself as an attorney, I know I can feel pretty destroyed after a meeting like that with a client. And having [case manager] kind of carry some of that, the heaviness of the clients, of receiving the client's story and being the person who the client is kind of processing with, really allows the legal team to like at the conclusion of [the] appointment, go along with the rest of their day. And... make their note about the appointment and then move on to the next thing on their to-do list as opposed to being really impacted in a negative way for the rest of your workday or even the rest of your work week about... an upsetting client appointment like that" (emphasis added).

As this quotation illustrates, the involvement of social service staff not only supports clients, but also supports legal staff working on cases. Social service staff tend to bring with them highly specialized skills that can help build personal and team-based capacity to "hold space" for clients in crises and assist clients and their legal representatives in processing difficult experiences.

As mentioned previously, it is well documented that immigration attorneys serving unaccompanied children regularly experience burnout which can contribute to attrition of critically needed legal staff. Legal staff from 3 organizations (19%) explain that the holistic representation model leads to decreased emotional burden and lessens the risk of burnout which may increase long-



term retention of legal staff in the field. Furthermore, 89% of direct service staff who responded to the culminating survey indicate that working as part of a holistic team under CHIRP has improved their work life and 84% report that it has made them more likely to continue serving unaccompanied children. While we are unable to examine the longer-term impacts of CHIRP on staff retention, experiences of CHIRP staff, coupled with previous research findings, suggest that the integration of social service staff into LSP operations at low legal to social services staff ratios can positively impact legal staff and thus support retention in the field.

4) Field Specialization Increases Organizational Knowledge Related to Effectively Serving Unaccompanied Children

During the pilot period, CHIRP exclusively funded services for unaccompanied children. This requirement allows LSPs and staff to focus on building deep knowledge around strategies to address the unique needs and circumstances of unaccompanied children. Staff from one LSP (6%) note that this led the LSP to strengthen relationships with local community-based organizations that provide services specific to or frequently needed by unaccompanied children, improving their ability to effectively serve youth. This specialization is particularly important because of the distinct barriers to accessing services unaccompanied youth face due to factors such as eligibility restrictions and language barriers, issues further discussed in the <u>impact on client experiences section</u>. This knowledge allows CHIRP staff to more efficiently direct clients to appropriate services and anticipate challenges with accessing those services.

Social service staff from 2 organizations (13%) agree that making and leveraging connections with contacts at community-based organizations and local departments of health is helpful in securing access to needed resources and expediting appointments for clients. As one social service staff explained:

"[O]ne thing that has helped [me effectively connect children with services]... is, I've made friends at the Department of Mental Health....And so now I know who to call when a child is getting barriers [to accessing services] and can't get in.... I'll go to this top person and say, hey, this child is really in need, they need support, they're not able to get it, what can we do? And they really kind of open the doors. It's really frustrating that it has to work that way, that it can't be just like I need the help and I have Medi-Cal, and I go and knock on the door and it's open. But building relationships in those systems and kind of going up the chain of command has been helpful" (emphasis added).

By allowing staff to focus exclusively on serving one population—unaccompanied children—and limiting caseload requirements to a reasonable level, CHIRP staff have the time to build relationships with key individuals within agencies and effectively advocate for clients under the project.



5) Increases Knowledge and Support of the Holistic Model Among LSP Staff

According to survey responses, less than 20% of direct services CHIRP staff report having worked as part of a holistic representation team prior to CHIRP.²¹ When asked about their knowledge of holistic representation models prior to their work on CHIRP, 34% of responding direct services CHIRP staff and program managers indicate no or minimal knowledge, with legal service staff reporting the lowest level of pre-participation knowledge. However, participation in CHIRP provides LSP staff the opportunity to increase their knowledge of what holistic representation is and the benefits of holistic representation models. By working closely on an integrated team, legal representatives report having a better understanding of the scope of services and types of support that social service professionals can provide for clients and their immigration cases. Similarly, by working on a holistic representation team, social service staff strengthen their understanding of the immigration system and can better advocate for clients.

Participation in CHIRP increases support for holistic representation among individuals and organizations. One hundred percent of survey respondents indicate that participation in CHIRP has made them more supportive of holistic representation. Both social and legal services staff share that they intend to continue applying the holistic representation skills learned through CHIRP to their practice even outside of the project because they have witnessed how effective these approaches are, especially when working with unaccompanied children. Participating in CHIRP allows staff to collaborate in deeper ways and, in turn, develop a greater understanding of the benefits of holistic representation²² and the roles played by different members of the team. These findings show that as people experience and understand the model more, their support tends to grow which is important to note because of the hesitation some LSPs have had around integrating social services into their work and adopting holistic representation models. The ways that CHIRP, including how deep collaboration between social and legal services staff, affect clients are described in the following section, impact on client experiences.

²¹ This is based on responses to the culminating survey that was sent out to subgrantee organizations and CHIRP funded staff. The total number of responses received was 46; 31 were from direct service providers (i.e., social service or legal service staff) with the remaining responses from program managers.

²² The benefits of holistic representation have primarily been studied in the context of holistic criminal defense, with smaller amounts of research in the areas of child welfare and immigration/asylum. Benefits identified include: stronger case preparation, improved client outcomes (legal and extra-legal), client trust, perceptions of procedural justice, and improved client satisfaction. For example, see Davidson, K.M., Ostrom, B.J. and Kleiman, M., 2022. Client perspectives of holistic defense: Strengthening procedural justice through enhanced client trust. *Justice System Journal*, *43*(1), pp.128-150.



Impact on Client Experiences

CHIRP is unique in that the project aims to provide clients with access to legal services and social services. While it was not possible to directly engage children enrolled in the program for this evaluation, LSP staff and program administrators were asked to share their perspectives on the impact of the project on clients. Data collected suggests that the project affects clients in 4 primary ways:

- 1) CHIRP increases client access to a greater range of social services.
- 2) The project increases the depth and length of support clients receive.
- 3) The project increases client engagement and agency.
- 4) The project improves the quality of services clients receive.

1) Increases Access to a Greater Range of Social Services

Compared to more common models of holistic legal services (in immigration and other fields), CHIRP decreases the ratio of legal staff to social service staff to one-to-one and recommends caseloads of 30-35 cases per holistic team. This structure results in social service staff having more time to support each client. In turn, staff report that clients enrolled in CHIRP have access to a greater range of social services. For example, in addition to standard case management and resource navigation, social service professionals are available to accompany clients to meetings and hearings (see Table 5); advocate for them at appointments related to education, health, employment, and housing assistance; and support clients in resolving conflicts, including conflicts with their sponsors. As a result, staff report that CHIRP increases client access to key services, with 91% of survey respondents reporting that CHIRP improves clients' access to educational training and resources.

Table 5. Number of Accompaniments Provided by CHIRP Staff by Type

Social service type	Number of Accompaniments
Medical	126
School	73
Mental health	17
Housing	11
Nutrition/food access	3
Youth development programs (mentoring)	9
Legal, immigration	162
Legal, non-immigration	40



Other ²³	113
Total	554

Staff from 4 organizations (25%) explain that social service staff provide crucial support to clients before and during court hearings. While legal representatives are busy preparing for and providing zealous representation of clients, social service staff prepare clients for what to expect in court before the hearing. Having a better understanding of what to expect and what transpires in court helps to alleviate client anxiety. Social service staff from 56% of LSPs reported accompanying clients and legal representatives to court hearings to provide emotional support, lead coping exercises, and explain proceedings to clients in accessible language. Some social service professionals even stepped in to provide interpretation for clients when there were no court interpreters available, as permitted by the immigration judge. While it is important to note that court interpretation is outside the scope of work of social service professionals and most often not a skill they are formally trained to engage in, filling this role can emerge as a trauma-informed response to court under-staffing in order to ensure children's cases are able to move forward in a timely manner and reduce delays that contribute to children's anxiety.

Under CHIRP, some social service staff also help clients navigate their relationships with sponsors who play a critical role in their lives. While many sponsors are parents or close relatives, it is not uncommon for children to be placed with sponsors who they have not lived with or have not had a meaningful relationship with for many years. Social service staff help children and their sponsors address some of the common challenges that arise during the reunification process, such as navigating new family dynamics, accessing education and support services, and proactively identifying issues that may impact the child's legal case. Nearly all (96%) staff responding to the culminating survey agree that CHIRP supports youth's integration into their sponsor's homes. A positive relationship between children and sponsors facilitates client engagement in their immigration case as they have a supportive adult who can assist with attendance at meetings and hearings, provide additional information that may be pertinent to the case, and potentially even opens avenues of legal relief for children, for example by serving as a guardian in an SIJS case. If conflicts with sponsors become unresolvable, social service workers are also able to help identify other potential sponsors. The support of social service professionals can thus help to improve the well-being of children and youth as they assimilate into life in the US and with their sponsors while their cases are pending.

An interviewee from one LSP added that the one-to-one holistic representation model of CHIRP offers a preventative framework for unaccompanied children and their caregivers. The model

²³ Other social service accompaniments were made for appointments related to biometrics, DPSS, domestic violence and sexual assault support, DMV, transportation, identity and travel documents, resources and supplies for families, bank accounts and financial assistance, electronic devices and technology assistance, career development, and hobby activities.



allows the CHIRP team to identify and address issues before they escalate into crises. Under CHIRP, legal representatives and social service staff frequently check in with clients, a level of engagement not generally possible under holistic representation models with higher caseloads and higher ratios of legal staff to social service staff. The limited capacity to focus on preventative interventions associated with models of legal representation for unaccompanied children that do not include social services or that feature higher attorney to social worker ratios can lead to a more reactive approach to supporting clients. According to program administrators, the additional time social service staff can dedicate to supporting clients under CHIRP results in some going so far as to offer preventative counseling and support—such as education about healthy relationships—aimed at helping youth build the skills necessary to navigate challenges and avoid crisis situations. This is particularly useful considering that the largest proportion of CHIRP clients are between the ages of 16-18, an age where youth face new challenges during their transition into young adulthood.*

2) Increases the Depth and Duration of Support

CHIRP also increases the depth of support clients receive. For example, staff from two organizations (13%) explain that compared to clients served by other programs, CHIRP clients are more likely to successfully receive needed social services because they have dedicated social service professionals following up and helping them overcome barriers associated with accessing resources or attending appointments. Moreover, the CHIRP model expands youth's network of support: 100% of CHIRP staff who responded to the culminating survey agree that CHIRP increases youth's access to trusted adults they can turn to for support. This is particularly important considering the risk of labor exploitation and abuse for unaccompanied children.*xxiii

In many cases, CHIRP increases the amount of time for which clients are eligible to receive social services at participating LSPs. Under CHIRP, clients have access to ongoing social service support for the entire lifecycle of their immigration cases whereas other programs that fund social services limit the period in which unaccompanied children can receive support to as little as sixmonths. ²⁴ The longer service timeline and one-to-one staffing ratio under CHIRP allows staff to build meaningful relationships with clients and support them in working towards long-term goals in addition to navigating emergent challenges.

Taken collectively, evaluation data indicates that CHIRP is effective at fostering the development of a strong support system for youth (including and beyond their official sponsor and household), which is critical in supporting their integration into local communities and overall well-being as they await the adjudication of their legal cases.

²⁴ One interviewee noted that another program that funds social services for unaccompanied children only covers social service support for a limited time, rather than for the duration of the immigration case.



3) Improves Client Engagement and Agency

Evaluation data indicates that CHIRP improves client engagement and promotes increased agency among those enrolled in the program. This is largely attributed to higher levels of social service support available to youth under CHIRP. For example, CHIRP social service staff are available to check-in frequently with all clients, including those who are not responsive to communication from the legal team, providing more opportunities for sustained client engagement.

At the same time, social service staff report that CHIRP empowered children to ask questions and to be involved in shaping their legal cases and the social services they receive. Interviewees from 3 organizations (19%) share that social service staff attend meetings with youth and recognize signals from their reactions, responses, or lack thereof which may indicate when clients may not fully understand what is being said or when there may be more to unpack. Social service staff then encourage clients to ask for clarification or ask legal representatives to explain the matter again in more accessible language. Alternatively, social services staff can interpret and explain details of the immigration case in accessible language to clients so they can better understand the implications of their decisions and make informed decisions.

By offering robust social services, CHIRP teams demonstrate to clients that they have their best overall interests in mind, not just their best legal interests. An interviewee from one LSP noted that this model is effective at shifting power back to clients by inviting clients to think about and communicate their self-identified needs and goals. Compared to representation models that do not incorporate social services, CHIRP fosters stronger rapport and in turn, clients are more engaged with their cases and centered in the decision-making process. Staff from 2 organizations (13%) specifically note that CHIRP clients who receive zealous support from dedicated social service professionals are better set up for success to advocate for themselves compared to clients served under other programs who receive less robust social services support due to higher staffing ratios.

CHIRP also increases client engagement with social services by presenting this support as part of the package of services available to clients in support of their immigration case. Routine conversations with social service staff create opportunities to talk about mental health and therapy, topics that are taboo in many of the cultures and communities from which clients come from, as one social service staff describes. An interviewee from one LSP argues that framing the mental health support that social service staff offer as part of holistic representation and related to the immigration case helps to destigmatize these services and makes it easier for clients to accept them.

4) CHIRP Improves the Quality of Services Clients Receive

CHIRP staff overwhelmingly report that CHIRP improves the quality of both the legal and social services clients receive. For example, interviewees from 2 organizations (13%) report that



CHIRP strengthens the ability of clients to receive benefits because there is a legal expert on the team who can review the laws and regulations associated with different social service benefits and advocate for clients when they are erroneously denied services. Moreover, the high degree of collaboration between social and legal services staff cultivated under CHIRP allows for social service staff to gain knowledge about the US immigration system overall and about their clients' specific legal cases which allows them to serve unaccompanied youth more effectively. As one social service staff explained:

"Working as part of an integrated team impacted the social services and support I am able to offer clients by being mindful of the client's background rather than just having an individual coming for a specific need. I am very careful of the types of questions I can ask so I do not trigger traumatic memories. I am also aware of the barriers that clients may encounter when applying to benefits because of their immigration status. In addition, I can offer moral/emotional support in hearings, which is rare to see in a courtroom where only family members, officers, attorneys and court staff are present."

As this quotation illustrates, the holistic representation model unlocks a new opportunity for staff to consider the interactions between the immigration case and social services. For example, understanding the different forms of relief clients are pursuing and knowing when clients are expected to receive legal documentation informs the planning and timeline for resource referrals and support services, such as applying for benefits that require a social security number or preparing clients for their job search.

This unique capability is particularly salient during emergencies when rapid response is required. Integrated CHIRP teams, rather than just social service or legal staff alone, are better equipped to help clients weigh the pros and cons of their available options. Social service staff mobilize to support the immediate needs of the client while legal staff work on analyzing the implications of the client's situation on their immigration case. For example, on CHIRP teams where social service staff are not mandated reporters, legal staff can help explain the potential consequences of clients making self-reports to relevant agencies, should they choose to do so, on their immigration case. After the crisis is stabilized, social and legal services staff collaborate with clients to assess when they can meaningfully engage with their immigration cases again and the best way to continue supporting clients toward reaching their comprehensive goals. A legal service program manager recounted the following example:

"[W]e have one client who was a native of a country we don't typically see. So linguistically kind of isolated, geographically isolated... And we discovered that he had... an undiagnosed mental health condition. And as a result of a mental health episode, he was arrested in the criminal context and then detained... we just happen to have the



expertise to do the post-conviction relief case in-house, to try to remove that barrier so we can get him status. And we also... rushed... his SIJ case to prevent age out... [T]he social services team, by connecting him with Medi-Cal and trying to get him connected with behavioral health services was able to assist us in... showing that he did have this undiagnosed [mental health condition]... and getting him services to respond to that. And... also linking him with... community members that spoke the language he spoke, getting him some... sense of community... [The social services team] being able to take on that piece, we were able to focus on... post-conviction relief and... time-sensitive guardianship and SIJS petition and we secured that for him, that was granted...So that was a really nice collaboration that I don't think that we would have the capacity to do with our legal team working through the volume that we are. So, the social services team... was a lifeline, not just for his own mental health but also for legal strategy" (emphasis added).

As this anecdote demonstrates, the inclusion of social service and legal staff in clients' cases can increase the quality of services rendered by involving individuals with differing backgrounds and expertise in assessing situations and strategizing how best to proceed. The involvement of social service staff is often critical to not only effectively supporting clients but also in obtaining additional information that illuminate critical pathways to legal relief clients may be eligible for.

Nearly all legal staff who responded to the survey (94%) indicate that CHIRP improves their ability to provide high-quality, zealous representation for their clients. Interview data suggests that this is related to two factors: 1) the way in which social service staff are able to forge connections with clients that facilitate increased information sharing and 2) the degree to which the one-to-one model of holistic representation frees up attorney time to focus on the legal matters (as detailed in section Role Specialization Improves Services Rendered and Supports Retention of LSP Staff). Interviewees from 50% of LSPs share that the strong and trusting relationships clients have with social service professionals encourage clients to disclose information relevant to their immigration cases that legal staff would not have otherwise known.

Additionally, social service staff connect clients to services that support their basic needs including health insurance, vaccinations, and school enrollment. Previously, legal staff were often responsible for securing these resources that support clients' well-being and can also bolster their immigration cases. Having social service staff take on these responsibilities increases efficiency as they are more familiar with these resources and systems which in turn frees up capacity for legal staff to focus on legal case work. As one legal service staff commented:

"An integrated team improves the legal services I can provide because it allows me to focus on my role and gives me more time to work on the legal issues before me without attempting to



navigate unfamiliar systems or tackle a problem I have no training in (i.e., mental health support, education systems). Even if the social services team cannot directly help the client with their issues, they have built a robust referral network and can point the client in the correct direction" Moreover, social service staff can further contribute to the immigration case by writing letters of support and providing testimonies on the types of social services that clients received.

CHIRP is particularly effective at increasing the quality of both the social and legal services clients receive to better support unaccompanied children. Importantly, data suggests that the powerful impact of the model is due at least in part to the degree of which staff can dedicate time to clients' cases and to meaningfully collaborate with each other as a result of the one-to-one ratio of social service to legal staff and relatively low caseload requirements. Further assessment should be conducted before either of these features is modified to understand the potential impacts of any changes to the program structure on client experiences.

Program Implementation

As previously mentioned, during the pilot period, 16 subgrantee organizations participated in CHIRP, half of which had no experience integrating social services into their organizations and none of which had experience carrying out a one-to-one model of holistic representation. Data on the barriers and facilitators to project implementation were initially collected via interviews with CHIRP funded staff and program administrators. Key themes identified were then integrated into the culminating survey to assess the degree to which barriers and facilitators were experienced across participating organizations. This section provides a summary of the most prevalent and significant barriers and facilitators. Importantly, program administrators worked with CDSS to modify program guidelines and policies to iteratively address barriers during the pilot phase of the project. Assessing the impact of these modifications is outside the scope of this evaluation, but relevant information on project modifications that were made in response to challenges encountered is included.

Barriers to Project Implementation

Evaluation data identified barriers to project implementation that are grouped into three primary categories: hiring; funding structure and limitations; and external factors.

1) Hiring

LSPs experienced significant barriers with the hiring and recruitment of both legal representatives and social service professionals to fill CHIRP positions. During the pilot period, 3 of the 40 budgeted CHIRP FTEs were never filled by permanent staff. Hiring challenges led to delays in the start of service delivery at many organizations. Organizations report that hiring both social service and legal staff is challenging, though some differences emerged in terms of the barriers.



More than half (53%) of organizations that responded to related questions in the culminating survey report that hiring legal staff for the project was somewhat to extremely challenging. These challenges led LSPs to adopt various strategies to deliver legal services under the project. Some subgrantee organizations filled positions with attorneys they already employed rather than with new hires, some for a temporary period and others for the duration of the project. In a small number of situations, subgrantees rescoped legal service positions in order to expand the pool of eligible candidates beyond barred attorneys; this allowed organizations to hire non-barred law school graduates and Department of Justice accredited representatives to support the delivery of legal services for the project. Barriers to recruiting CHIRP legal representatives reflect the broader challenge with attorney recruitment and retention in immigrant legal services organizations faced nationally^{xxiv} and contributes to highly uneven geographies of legal access for immigrant populations.^{xxv}

More than half (53%) of organizations that responded to related questions in the culminating survey also report that hiring social services staff was somewhat to extremely challenging. Organizations note that it was particularly difficult to hire licensed and experienced social workers. Interviews with program administrators reveal that for organizations new to offering in-house social services, a lack of in-house social work supervisors was a barrier to hiring because this meant that the organization did not have the capacity to supervise training requirements necessary for social workers working towards licensure. This is supported by survey responses where over half of responding organizations (53%; 8 out of 15) report that a lack of a clinical supervisor for social work staff presented a moderate to extreme challenge to program implementation. In response to this feedback, the program administrators worked with CDSS to add an option for Associate Clinical Social Workers in the network to join a group supervision cohort organized by Acacia and overseen by a Licensed Clinical Social Worker, external to their organization, to accrue hours toward licensure. The challenges associated with hiring social workers also led some organizations to rescope social service positions to include case managers, allowing for a wider pool of candidates to apply. While outside the scope of this evaluation, it may be useful for future evaluations to assess the degree to which case managers and social workers offer differing levels of support to clients and the impact this may have on the integrated team and, ultimately, on client experiences and outcomes.

For both social and legal service staff, subgrantees report that the salary cap imposed by the funder was a barrier to hiring, with 60% of responding organizations identifying the salary cap as presenting a very or extremely challenging barrier to implementation. According to interviewees from 3 organizations (19%), the salary ranges for all positions offered under CHIRP were too low and not competitive enough to attract candidates with the preferred skillsets (e.g. Spanish proficiency, experience working with unaccompanied children) and credentials to work effectively under CHIRP.



Some organizations navigated this challenge by supplementing CHIRP funding with other internal funds. While this proved to be a viable way to attract qualified staff, this requires subgrantee organizations to have discretionary supplemental funding available. Relying on subgrantees to supplement funding may present challenges to sustaining participation in the program or recruiting new organizations to participate. This may also affect the types of organizations that are able to participate by unintentionally making participation inaccessible for smaller or less well-resourced organizations.

Given the initial grant's limited 2-year timeline, organizations were permitted to commence services prior to having completed hiring for the holistic representation team by allowing temporary staff to fill positions, starting service delivery before all roles on the holistic team were filled, or both. For example, some organizations report that they started enrolling clients in the program when only the legal service staff role was filled. While this strategy allowed for organizations to commence CHIRP services sooner, in some cases this also presented challenges. For example, one legal service staff shares that it was difficult to explain the exciting features of the holistic representation model to clients while also having to explain that social services support was not yet available to them because the social service professional had not yet been hired and it was not clear when they would be. Furthermore, not having both social and legal services staff to provide complementary services to new clients from case initiation forced teams to diverge from effective practices such as having joint intakes. Lastly, social service staff who joined the holistic representation team after client intakes were completed report that it was initially more difficult to reach and engage clients because they were not present at case initiations.

2) Funding Structure and Limitations

Nearly half of responding organizations (40%) indicate that the 1 FTE funding requirement, requiring CHIRP-funded staff to dedicate 100% of their time to CHIRP work, to be very or extremely challenging to navigate. One reason for this is because some organizations are structured such that staff are primarily funded through grants and contracts that have competing eligibility guidelines and timelines. For example, some organizations have funding to work with adults as well as children and/or with a wider range of cases.²⁵ According to an interviewee from one LSP, because of the 1 FTE requirement, more experienced attorneys were less interested in the position because they were reluctant to exclusively focus on unaccompanied children's cases.

Additional interviewees note that the 1 FTE requirement, combined with the eligibility restrictions under the grant, created challenges when representing children who had family members

²⁵ Importantly, as discussed in the <u>Impacts within Subgrantee Organization</u> section, evaluation data also show that field specialization increases organizational knowledge related to effectively serving unaccompanied children. This finding should be kept in mind when assessing the barriers presented by the 1 FTE model and potential program modifications.



who were also pursuing immigration relief. Because only unaccompanied children were eligible for CHIRP services and legal representatives funded via the grant could only work on CHIRP, in some cases, CHIRP or CHIRP-eligible clients were assigned or transferred to a different program that allowed the whole family to be represented by the same attorney.

CHIRP funding was restricted to certain staff categories, leaving many support staff positions (e.g., paralegals, legal assistants) and supervisory/managerial positions (e.g., managing attorney, supervising social worker) unfunded under the grant. Evaluation data indicate that these funding restrictions presented significant challenges to program implementation, with 80% of responding organizations noting that a lack of supervisory/managerial staff funding was somewhat to extremely challenging and 53% reporting the same in relation to support staff. Supervisory/managerial staff are imperative to ensuring that legal representatives new to immigration law and/or serving unaccompanied children have the training, mentorship, and other support needed to zealously represent clients. At some organizations, paralegals and legal assistants also play an essential role in advancing cases by engaging in tasks including gathering signatures, drafting forms, assisting clients with transportation to the office or court, providing translation services, tracking important due dates, and obtaining work permits. Without these critical support staff, the CHIRP team has a significantly lower capacity to serve clients. As one legal service staff explained:

"I think we're missing a really critical piece [on our team] to tell you the truth. We're missing a paralegal... [T]he social service worker has a very specialized skill set. I have a very specialized skill set. And we want to make the most of that, right? But most of what needs to happen for kids in the ongoing stuff is like a work permit renewal, is getting help to get referred to a new school. Things that don't necessarily require that like legal counseling or emotional counseling, kind of specialized knowledge or training... a lot of that like paralegal level work, right? But we don't have that component right now, so.. it limits our capacity a little bit too."

Interviewees noted that the work of supervisors and support staff is critical for the effective delivery of social and legal services to clients, as well as for the successful implementation of the program overall. Thus, interviewees argued that CHIRP should fund supervisors and support staff in order to make the program sustainable.

It is important to note that CDSS did expand funding parameters during the grant period and allowed funding to be directed towards some supervisory and support staff. However, it is outside the scope of this evaluation to examine the overall impact this modification had on subgrantee organizations or service delivery.



3) External Factors

While not a direct barrier to program implementation, it is important to highlight that evaluation data indicated that external factors (i.e., state, local, and organizational policies; geographic location; prevalence of resources) impact the degree to which CHIRP clients are supported. Interviewees from five organizations (31%) note that systemic barriers make it difficult to comprehensively support clients. For example, many local providers and social service organizations do not have policies to accommodate unaccompanied children or are not familiar with such policies if they do. Some social service organizations require signatures from legal guardians or social security numbers, excluding some unaccompanied children from accessing services. Others require that sponsors be present at appointments, making access to services difficult for children whose sponsors have limited availability due to work or other obligations. CHIRP clients have high needs for stable housing and mental health support, but interviewees report that both resources are often unavailable. Moreover, even when organizations that serve unaccompanied children are identified, wait times for appointments are often extremely long, which may discourage or prevent youth from receiving services. Furthermore, not all providers that accept unaccompanied children are well equipped to serve them. For example, many social service organizations lack Spanish speaking staff or interpretation services and do not have welcoming environments, staff, forms, and other procedures to accommodate all literacy levels and the needs of clients with limited prior experience navigating such systems.

Local policies further dissuade clients from accessing resources. For example, interviewees report that in the Central Valley, there is a lack of Spanish speaking mental health practitioners in schools and in San Mateo, youth older than 17 years old face challenges enrolling in local high schools and are instead being sent to adult schools.

These insights highlight the importance of recognizing that CHIRP is a project whose success relies upon a wider ecosystem of services, policies, and practices that shape resources available and accessible to unaccompanied children.

Facilitators to Project Implementation

Evaluation data identified various facilitators to project implementation that can be grouped into three primary categories: technical assistance; communication and engagement approaches; and reasonable caseload requirement.

1) Technical Assistance

As many CHIRP subgrantee organizations had no experience integrating social services into their legal practice and none of the organizations had experience implementing a one-to-one model of holistic representation, it was imperative for program administrators to offer robust technical



assistance to providers to increase knowledge and establish the organizational infrastructure needed to effectively implement CHIRP. Acacia offered technical assistance support including access to individualized technical assistance providers; facilitated processing groups where CHIRP staff could discuss their emotional challenges and learn about strategies for navigating work-related stress; written resources and training webinars; and onsite training programs.

Individualized technical assistance providers hosted monthly office hours and offered CHIRP staff access to psychological and legal guidance from experts in the field: Dr. Arielle Balbus and the Catholic Legal Immigration Network, Inc. (CLINIC). Dr. Balbus is a licensed strengths-based clinical psychologist who is available for staff seeking support with specific social service case questions and to learn more about trauma-informed practices for serving youth. CLINIC is an organization of legal experts who are available for staff seeking support with specific immigration case questions. Nine out of 13 responding organizations (69%) found the individualized technical assistance offerings to be very or extremely helpful. This is supported by interviewees who feel that they can turn to individualized technical assistance providers for support in processing cases, which is particularly important for those who are the only social service staff at their LSP. Acacia also organized a group supervision cohort for Associate Clinical Social Workers in the network looking to accrue hours toward licensure, overseen by a Licensed Clinical Social Worker. All 3 organizations who took advantage of this opportunity during the pilot period report that this Acacia-coordinated clinical supervision was very or extremely helpful in ensuring successful project implementation.

Girasol is an extension of the Texas Institute for Child and Family Wellbeing at the University of Texas at Austin. Girasol works with community partners to support immigrants by educating and providing processing groups to service providers on vicarious trauma. Acacia contracted with Girasol to offer one-hour monthly processing groups to CHIRP service providers. The groups are led by a licensed clinical social worker with experience working with immigrant communities. The processing groups are a safe space where CHIRP social and legal services staff can gather to discuss and learn about the challenges associated with vicarious trauma and how to cope when experiencing feelings of burnout from exposure to client's trauma and suffering. The processing groups are not psychotherapy groups, but rather are designed as support groups to mitigate the impacts of vicarious trauma and support the well-being of direct service staff. All responding organizations found the Girasol processing groups beneficial to program implementation, with nine organizations (64%) noting that they were very or extremely helpful. Interviewees note that creating spaces for staff to debrief with peers and work in community is critical for staff well-being.

Acacia also provided written resources and presented virtual training on holistic representation, covering topics such as how to integrate social services into legal practice and defining roles and responsibilities on holistic teams. According to evaluation data, these resources



support legal representatives to learn about social services, strengthen partnerships on integrated teams, and build mutual understanding among staff to better navigate conflicts. Ten out of 13 (77%) responding organizations found the Acacia-provided technical assistance resources very or extremely helpful.

Finally, Acacia hosted annual onsite training programs that brought CHIRP staff, as well as some support and supervisory staff, together in person to connect and learn more about salient topics and trends affecting unaccompanied children. Eight out of thirteen (62%) of responding organizations found the onsite training programs very or extremely helpful. Interviewees add that these networkwide convenings provided an opportunity to share, understand, and draw inspiration for different approaches to program implementation.

These insights suggest that technical assistance resources are critical for supporting organizations serving unaccompanied youth in general and particularly important for supporting organizations new to holistic representation models and approaches.

2) Communication and Engagement Approaches

Interviewees report that sustaining engagement and communication with clients and their sponsors is an ever-present challenge when serving unaccompanied youth who have many competing demands on their time and energy. However, interviews reveal that provider flexibility and willingness to utilize multiple communication methods and adapt to client preferences facilitated successful service delivery. Interviewees share that youth were more responsive and preferred communicating via texts or WhatsApp messages. Many CHIRP staff also report providing clients with direct access to their phone numbers and accounts used for messaging. While this provided additional communication avenues and fostered a positive client-staff relationship, staff also note that this can lead to difficulties setting boundaries around work hours and reasonable response times. Interviewees additionally share that virtual meetings and documentation delivery options were often more convenient for clients as they eliminated the need for clients to physically come into the office and the barriers related to availability and transportation. Staff flexibility in communication methods and approaches is generally seen to increase client engagement with services.

Notably, communicating with clients does not necessarily mean that the information being communicated is understood. To ensure that clients understand the information being given, staff found that asking clients to repeat the information in their own words helped them gauge comprehension and points to provide further elaboration on. Staff are mindful to use plain language, avoiding "legalese", and aim to foster a relationship where clients feel comfortable asking questions when they do not understand something. Staff also found that using visuals is a helpful communication tool.



Among LSPs with CHIRP clients distributed across a wide range of geographic areas, interviewees from two organizations (13%) share that having two staff on the holistic representation team who live in different areas increase their ability to connect with clients in more locations that are convenient for clients. Clients and sponsors have limited availability to meet with staff due to school and work responsibilities and often face challenges with transportation to meetings. Therefore, it is critical that holistic representation teams travel to clients to enable clients to participate in their legal case and receive social services support.

These insights highlight the importance of flexibility and adaptability among project staff to engage with clients. Adapting to client preferences for different communication mechanisms increases the likelihood that clients will remain engaged and responsive to the holistic team and, in turn, receive more effective support. Similarly, using child-centered and developmentally appropriate language and strategies to assess comprehension helps ensure that clients understand information and if need be, allows staff to provide additional clarification. Finally, geographic flexibility on the part of organizations and staff can serve to effectively expand the geographic reach of services and provide additional opportunities for promoting client engagement and service delivery.

3) Reasonable Caseload Requirement

Under CHIRP, the caseload requirement was set to 30-35 cases. This was informed by the expertise and knowledge of program administrators regarding the demanding and emotionally draining nature of the work associated with unaccompanied children's cases (a factor known to lead to attrition), alongside the high demand for these services. Interviewees from 44% of organizations report that this moderate caseload requirement is sustainable for the holistic teams. Interviewees further describe additional factors that affect the number of cases a team can reasonably handle at a given time including, the experience level of staff, current activity level of legal cases (i.e., active or pending), current immigration policies and processing times, and the degree to which clients have assimilated to life in their new homes and communities. Interviewees also note that both the social and legal services workload for each case is unpredictable as it is difficult to determine the complexity of the client's legal claims or the extent of their social service needs, at the outset of the case. If multiple clients have complex and active immigration cases or are in crises at the same time, the workload for the team can be overwhelming even if the caseload is relatively low. Supervisory staff on the project also note that the moderate caseload requirement made it easier to manage social and legal service staff working under a new service model.



Sustainability, Scalability, and Transferability Considerations

Since CHIRP is a pilot initiative, identifying key issues to consider when assessing the sustainability, scalability, and transferability of the model is important to inform future iterations. In this section, secondary data was combined with evaluation insights to identify the following six key issues which CDSS should consider when planning for the continuation or expansion of the project:

- 1) Workforce development challenges in the state of California
- 2) Support and supervisory staff
- 3) Staff support and retention
- 4) Programmatic flexibility
- 5) Case length and funding models
- 6) Geographic disparities and access to services

1) Workforce Development Challenges in the State of California

California has suffered from a lack of clinical social workers for several years. A 2021 survey of counties across the state demonstrated that 70% of county level behavioral health agencies had difficulty recruiting licensed social workers and 82% had difficulty recruiting staff who specialized in treating specific populations, including children.xxvi Most also reported difficulty recruiting professionals who reflect clients' race/ethnicity, including Latinx staff, and 79% reported difficulty recruiting enough Spanish speaking staff. Major barriers to recruitment included competition from other employers and the inability to offer competitive pay, alongside high cost of living and lack of affordable housing.xxvii These trends reveal that the hiring challenges CHIRP subgrantees face are not unique nor are they likely to abate in the near future.

Similarly, lawyers are in short supply. Law school enrollment in California decreased by more than 12% between 2013 and 2023.xxviii At the same time, data from the American Bar Association suggests that the growth of student loan debt among law school graduates affects career decisions and results in drift away from public interest careers.xxix These combined issues create challenges to recruiting and retaining attorneys at non-profit immigrant legal service providers.

In contemplating the sustainability, scalability, and transferability of CHIRP, CDSS should keep this workforce development context in mind. This is particularly important when considering project parameters related to salary ranges and staff roles and responsibilities.



2) Support and Supervisory Staffing

Support, administrative, and managerial staff are critical to successfully supporting clients and offering zealous representation. This is particularly important when staff salaries and responsibilities result in less experienced legal representatives, who need more robust training and support, filling positions. Developing funding guidelines that recognize the essential role these staff members play is important to ensuring that CHIRP not only continues but that the holistic representation services delivered under the program are of high quality. CDSS should also continue funding external clinical supervisors for organizations that do not have internal supervisory capacity to support social workers working towards licensure, while also considering other ways to build LSPs' internal capacity to support and supervise social service staff. Additionally, continued funding for robust technical assistance resources is imperative to ensuring organizations new to the one-to-one model of holistic representation are prepared for effective service delivery.

3) Staff Support and Retention

Research demonstrates that providing services to unaccompanied children is emotionally draining and puts staff at risk of vicarious trauma and burnout which contributes to attrition in the field.** Ensuring that supervisors, managers, and organizational leaders are trained on effective organizational practices for reducing burnout and provided with access to resources that enable them to operationalize these practices is critical for project sustainability.

While evaluation findings point to the positive impact that CHIRP and the integration of social service staff can have on organizations and other staff, it is important to note that social service staff also need avenues of support (e.g. support and mentorship from an in-house social service supervisor). CDSS should continue to fund technical assistance training and funding flexibility to ensure organizations have access to the resources they need to support staff well-being and retention.

4) Programmatic Flexibility

While examining the unique structures and characteristics of subgrantee organizations is outside the scope of this evaluation, interviews with staff and program administrators reveal a high level of variation across organizations (e.g., size, funding models, experience in the field). As discussed in previous sections, subgrantee organizations faced many barriers during program implementation. Flexibility from program administrators and CDSS allowed subgrantee organizations to move forward with project participation and successfully serve clients. At the same time, variation in how the project model is implemented across organizations limits the rigor with which the impact of the project model on youth served can be systematically assessed. Balancing the need for pragmatic flexibility



alongside the ability to validly evaluate the model's impact should be considered by CDSS and project administrators when developing future program guidelines.

5) Case Length and Funding Models

The US immigration court system suffers from an extensive backlog, with the number of pending cases exceeding 3 million.xxxi This results in extended adjudication timelines for unaccompanied children in particular. According to the most recent data from the Department of Justice and Executive Office for Immigration Review, the median time for an unaccompanied child's case to reach completion is 1,241 days or nearly 3.5 years.xxxii However, more comprehensive data, available from the Department of Homeland Security Office of Immigration Statistics, shows that 15% of unaccompanied children's cases were still pending 8 years after they began. Roreover, advocates and researchers have drawn attention to the visa backlog for SIJS-approved youth (youth who have been granted SIJS and are waiting for a visa to become available, so they are eligible to apply for legal permanent residency) and the impact this has on unaccompanied children. The National Immigrant Justice Center and End SIJS Backlog Coalition note that over 100,000 immigrant youth are stuck in this backlog and are "in jeopardy of being exploited and deported".xxxiii

CHIRP evaluation data demonstrates that youth served under the program can access support and services that help them integrate into communities and a network of trusted adults they can turn to for support. This type of support is particularly critical considering the lengthy case timelines and significant precarity experienced by youth while their legal status is in limbo. At the same time, interviewees explain that the average workload for cases vacillates over the lifetime of a case. For both social and legal services, the workload is highest at the beginning after case initiation as legal representatives work to submit all their filings and social service professionals work to refer clients to needed resources. This frontloaded work is followed by a lull as clients wait for their cases to move forward and their lives become more stabilized. However, this general pattern may be different for individual clients who have complex legal cases, have new experiences that make them eligible for new forms of relief, or have continuing social service needs.

In assessing the sustainability, scalability, and transferability of the program model, CDSS should be mindful of the time children's cases take to complete and align program guidelines and funding models to support clients for the full duration of their cases. At the same time, more inquiry into how staffing needs vary over the course of a case is necessary for developing a staffing model that provides clients with high quality services and supports a manageable workload for staff.

²⁶ This figure is based on analysis conducted by Dr. Mike Danielson, Director of Research and Evaluation at Acacia Center for Justice. Utilizing data tables that accompanied the 2021 Enforcement Lifecycle Report, he was able to track case completion by entry year cohort from FY 2013 through FY 2021.



6) Geographic Disparities and Access to Services

As is well documented, free and low-cost legal services are unevenly distributed nationally as well as at the state level, resulting in many areas having low rates of accessible immigrant legal services. While geography is not the only barrier to accessing legal services that immigrants face that is a key factor that should be considered when assessing if and where to expand CHIRP. According to Acacia's analysis, we estimate that there are at least 80 unaccompanied children with active immigration cases for every free or low-cost attorney in the state of California. It limited data hinders our ability to definitively identify the counties where need is greatest, but initial analysis and evaluation data suggest that San Bernadino, Riverside, Alameda, Napa, and Los Angeles counties have high numbers of unaccompanied children compared to free and low-cost legal service providers. In exploring approaches to expanding CHIRP, CDSS should consider geographical disparities in terms of need and access to services in order to fill existing gaps in services.

Conclusion and Recommendations

The evaluation of CHIRP during the two-year pilot period demonstrates that the project was effective at increasing unaccompanied children's access to holistic legal representation, with 698 children receiving holistic legal representation. Moreover, there were additional benefits experienced by participating LSPs, project staff, and clients. In challenging participating LSPs to integrate social and legal services in a more equitable and robust way, the project improved the quality and depth of services and increased client engagement and agency. At the same time, the integration of social service professionals into LSPs served as a mechanism to increase knowledge of the important role social service professionals play in supporting children's legal cases and well-being, while also expanding the integration of trauma-informed practices. Additional findings suggest that the structure of the model allowed for role specialization that positively supported the well-being and work life of project staff, which can increase staff retention over time. Most importantly, project staff overwhelmingly indicated that CHIRP improved the quality of services provided to unaccompanied children, supported their integration into communities, and more effectively connected them to services and trusted adults that can support their overall well-being.

²⁷ This estimate is based on publicly available data from the US Health and Human Services and the Office of Refugee Resettlement on the number of children released to sponsors in each state and data published in Kerwin and Millet 2022 on the number of free and low-cost attorneys in the state of California. In order to account for the immigration court backlog and amount of time it takes children's cases to be completed, we added the number of children released to sponsors in the state of California between FY 2019 and FY 2023 and then divided that number by the number of free or low-cost immigration attorneys in the state. Importantly, this method does not account for the fact that not all free or low-cost immigration attorneys represent unaccompanied children or if those who do currently have capacity to take on new cases. For these reasons, we consider it an under-estimate of the actual number of attorneys available to represent unaccompanied children.





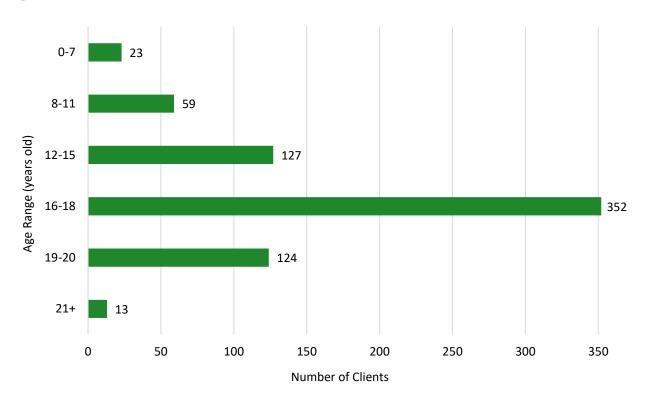
However, there are numerous barriers to sustaining, scaling, and transferring the CHIRP model that CDSS and program administrators should keep in mind as they determine how best to expand holistic legal representation for unaccompanied children in the state of California. Key challenges include hiring within the context of social worker and lawyer shortages, establishing funding guidelines that are responsive to the differing circumstances of LSPs while ensuring the integrity of key program characteristics, and filling geographic gaps and disparities in access to representation. The goal to expand services can only be met if an adequately trained and willing workforce is present in the areas where services are most critically needed. Moreover, providers, funders, and administrators must constantly navigate changes in federal immigration policy that affect the pace and flow of children in need of services and the rate at which their cases are adjudicated. Remaining aware of these challenges and using data informed insights to strategize how to navigate them are critical to the sustainability and expansion of holistic legal services in the state.



Appendices

Appendix A. Client Demographics (n=698)

Age



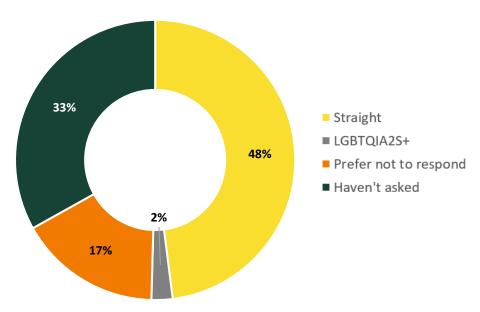
Gender Identity

Gender Identity	Number of clients	Proportion of clients (%)
Man (boy)	386	55%
Woman (girl)	309	44%
Other ²⁸	3	0.4%

²⁸ Other gender identity responses included gender queer, gender nonconforming, non-binary, transgender man, transgender woman, transgender nonconforming, or another gender not listed.



Sexual Orientation²⁹



Country of Origin

Country	Number of clients	Proportion of clients (%)
Guatemala	341	49%
El Salvador	163	23%
Honduras	123	18%
Mexico	48	7%
Nicaragua	8	1%
Afghanistan	3	0.4%
Venezuela	3	0.4%
Other ³⁰	9	1%

²⁹ Acacia recommends that providers only ask for information about sexual orientation when they feel that sufficient rapport has been established with a client. The category "Haven't asked" thus applies to cases where providers have not asked for this information as of the end of the pilot period but are planning to do so at a later, more appropriate time. The category "Prefer not to respond" applies to cases where providers have asked for this information but clients preferred not to respond or declined to answer.

³⁰ Data reported in aggregate for all countries from which only one client reported originating from during the pilot period.



Appendix B. Summary Data Tables from Culminating Survey

Please indicate the degree to which you agree or disagree with the following statements. 1 strongly disagree; 5 strongly agree.

1 strongly disagree; 5 strongly agree.							
	Min	Max	Mean	Standard Deviation	Response Count		
Working as part of a holistic team improves my work life.	2.00	5.00	4.48	0.95	31		
I would like to continue working as part of a holistic team.	2.00	5.00	4.71	0.63	31		
Working as part of a holistic team makes me more likely to stay in this line of work (i.e., supporting unaccompanied children).	2.00	5.00	4.39	0.87	31		
Working as part of a holistic team improves the quality of the services I can offer clients.	2.00	5.00	4.61	0.83	31		

Please indicate the degree to which you agree or disagree with the following statement. 1 strongly disagree: 5 strongly agree.

i strongly disagree; 5 strongly agree.					
	Min	Max	Mean	Standard Deviation	Response Count
The CHIRP model improves my ability to provide high-quality, zealous representation for unaccompanied children.	3.00	5.00	4.69	0.58	16

The following factors have been identified as barriers to program implementation experienced by LSPs in the CHIRP network. Please indicate the degree to which the following factors posed challenges to successful program implementation at your organization.

1 not challenging; 5 extremely challenging.

	Min	Max	Mean	Standard	Response
				Deviation	Count
Hiring Social Services Staff	1.00	5.00	2.67	1.40	15
Hiring Legal Services Staff	1.00	5.00	2.47	1.45	15



Staff Salary Cap	1.00	5.00	3.53	1.31	15
100% FTE requirement	1.00	5.00	2.93	1.39	15
Differing Professional Standards Related to Mandatory Reporting	1.00	3.00	2.13	0.81	15
Lack of Clinical Supervision Capacity for Social Services Staff	1.00	5.00	2.60	1.25	15
Lack of Staff Experience Working on Interdisciplinary Teams	1.00	3.00	1.73	0.68	15
Team Communication	1.00	3.00	1.53	0.62	15
Lack of funding for supervisory/managerial staff	1.00	5.00	3.27	1.39	15
Lack of funding for support staff (e.g., paralegals, legal assistants)	1.00	5.00	3.20	1.42	15

The following factors have been identified as facilitators to program implementation experienced by LSPs in the CHIRP network. Please indicate the degree to which the following factors helped the successful implementation of the program at your organization.

1 not helpful; 5 extremely helpful

	Min	Max	Mean	Standard Deviation	Response Count
Acacia Coordinated Individualized Technical Assistance Providers (Dr. Arielle Balbus and CLINIC)	2.00	5.00	4.00	0.97	15
Acacia Coordinated Clinical Supervision from Ali Ballard	2.00	5.00	3.93	1.03	14
Acacia Technical Assistance Resources (webinars, trainings, written materials, etc.)	3.00	5.00	4.36	0.72	14
Acacia Coordinated On-Site Training Programs	2.00	5.00	3.79	0.86	14
Girasol Processing Groups	3.00	5.00	3.79	0.67	14



Assigning temporary staff to provide	1.00	5.00	3.71	1.10	14
support for CHIRP work during					
recruitment for full-time staff					

Please indicate the degree to which you agree or disagree with the following statement. 1 strongly disagree; 5 strongly agree. Min Max Standard Response Mean Count Deviation 46 Participating in CHIRP has made me 4.00 5.00 4.74 0.44 more supportive of holistic representation models.

Please indicate the degree to which you agree or disagree with the following statements. 1 strongly disagree; 5 strongly agree. Min Max Mean Standard Response Deviation Count The CHIRP model increases the 3.00 5.00 4.61 0.61 46 degree to which youth are successfully integrated into the community. 3.00 The CHIRP models supports youth's 5.00 4.46 0.58 46 integration into their sponsor's homes. The CHIRP model increases youth's 4.00 5.00 4.89 0.31 46 access to trusted adults to turn to if they face challenges. The CHIRP model improves youth's 4.00 5.00 4.80 0.40 46 access to educational opportunities and services. The CHIRP model improves youth's 1.00 5.00 4.48 0.80 46 access to employment and job training resources. 4.00 5.00 4.80 0.40 46 The CHIRP model improves the quality of legal services youth receive.



Appendix C. Qualitative Interviews and Culminating Survey Questions

Group and individual Zoom interviews

Social and legal services staff

- 1) Has your team set up any protocols and policies to effectively deliver holistic representation under CHIRP?
 - a) If yes, can you briefly describe these protocols and policies?
 - b) If no, can you briefly describe some informal practices your team has been following to deliver services under CHIRP?
 - c) What challenges are there to implementing these protocols/policies/practices?
- 2) Does having a legal/social services staff member on the team affect your processes for interacting with clients? Does working as part of an integrated team impact your approach and process for building trust and rapport with clients? Please elaborate on how and why it does or does not.
- 3) (Legal staff) How does having a social services staff member on the team affect your processes for developing legal case strategy?
- 4) (Social service staff) Does having more insight into the client's legal case affect your support on the social services side? Please elaborate on how and why it does or does not.
- 5) (Social service staff) How do you see your role in your client's legal case trajectory?
- 6) The holistic representation model may provide benefits to clients such as addressing their comprehensive needs but may also present complications such as creating situations where clients must navigate different roles and mandatory reporting obligations for different members of the integrated team. In your opinion, what benefits and complications does the holistic representation model have for the client?
- 7) Can you tell me more about your thoughts and experiences so far working under the CHIRP program parameters, including the one-to-one integrated team set up and 30-35 client caseload?
- 8) What are some facilitators and barriers to an effective working partnership on an integrated team?
- 9) Tell me more about how working on an integrated team affects your own well-being.
- 10) Is there anything you would change about how your integrated team operates currently or about the one-to-one integrated team model in general?
- 11) Do you have previous experience working with unaccompanied children and/or immigrant populations?



- a) If yes, can you tell me about your previous team model and how your previous work experience is the same and how it is different compared to your current work experience on an integrated team?
- 12) From your perspective as a legal/social staff member and thinking back to the beginning of your working relationship with social/legal services staff as part of CHIRP, what topics do you think social/legal services staff have already gained a deeper understanding of as related to holistic representation? What topics can they benefit from learning more about?

Program managers

- 1) Can you tell me more about the recruitment and hiring process for the CHIRP staff positions at your organization and how the CHIRP program parameters (including one-to-one integrated team, holistic representation model, 30-35 client caseload, and proposed salaries) may have affected this process?
- 2) Can you tell me more about the referral sources for your organization's cases (word of mouth, community-based organizations, schools, etc.)?
- 3) Has your team set up any protocols and policies to effectively deliver holistic representation under CHIRP?
 - a) If yes, can you briefly describe considerations when drafting these protocols and policies?
 Can you briefly describe these protocols and policies?
 - b) If no, can you briefly describe some informal practices your team has been following to deliver services?
 - c) What challenges are there to implementing these protocols/policies/practices?
- 4) In what ways do you see [legal/social] staff affecting the [social/legal] work for the client, which you might not have anticipated before your organization began implementing an integrated model?
- 5) The holistic representation model may provide benefits to clients such as addressing their comprehensive needs but may also present complications such as creating situations where clients must navigate different roles and mandatory reporting obligations for different members of the integrated team. In your opinion, what benefits and complications does the holistic representation model have for the client?
- 6) Are you responsible for providing supervision to the integrated teams under CHIRP?
 - a) If yes, can you tell me more about your experiences so far? What are some challenges and concerns you have related to the supervision of an integrated team?
- 7) Have you observed any impacts of the integrated team model on workload and feelings of burnout for staff providing direct services? If yes, please describe.



- 8) Tell me more about what you and your staff consider to be a manageable caseload. How does 30-35 cases per an integrated team fit into this?
- 9) Is there anything you would change about how your integrated team operates currently or about the one-to-one integrated team model in general?

In-person interviews

All interviewees

- Was your organization able to implement CHIRP so that there was one social work and one attorney working on the same cases?
 - a) If no, please explain why you were not able to implement the model that way.
- 2) Based on your experience, how has CHIRP impacted children's access to holistic immigration legal services in the area you serve?
 - a) Has it affected the number of children you can provide with legal services?
 - b) Has it affected the breadth of social services offered to children by your organization?
 - c) Has it affected the reach of your services to new populations of children?
 - d) Has it affected the reach of your services in terms of where you are able to offer services?
- 3) Based on your experience, what impact, if any, did CHIRP have within your organization?
 - a) Did it affect the degree to which social service staff and legal staff collaborate?
 - b) Did it affect staff recruitment or retention?
 - c) Did it affect staff professional development?
- 4) Based on your experience, do you think CHIRP impacted client experiences at your organization? Please explain.
- 5) Based on your experience what were...
 - a) The primary barriers to implementing CHIRP at your organization?
 - b) The primary facilitators to implementing CHIRP at your organization?
- 6) What factors do you think need to be considered when thinking about continuing or expanding the CHIRP model in the state of California?





Culminating Survey Questions

For All Respondents:

Prior to participating in CHIRP, had you worked as part of a holistic representation team? CHIRP defines a holistic representation team as a team of legal representatives and social services professionals are integrated through every stage of the legal case and the legal representatives are aware of the client's psychosocial needs (social and environmental influences on the mind and behavior) that may impact their well-being and the legal case. Both staff members collaborate and work on the same advocacy plan in support of the client and their legal case.

O Yes

O No

O Not sure



Please indicate the degree to which you agree or disagree with the following statements.

	Strongly disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Strongly agree
Working as part of a holistic team improves my work life.	0	0	0	0	0
I would like to continue working as part of a holistic team.	\circ	\circ	\circ	\circ	\circ
Working as part of a holistic team makes me more likely to stay in this line of work (i.e., supporting unaccompanied children).	\circ	0	0	0	\circ
Working as part of a holistic team improves the quality of the services I can offer clients.	0	\circ	\circ	\circ	0
Please indicate your response to the following	question.				
lease indicate your response to the following	question. Nothing	Minimal knowledge	Basic knowledge	More than basic knowledge	A lot
Please indicate your response to the following Prior to participating in CHIRP, how much did you know about holistic representation?				basic	A lot
Prior to participating in CHIRP, how much did you know about holistic representation?	Nothing	knowledge	knowledge	basic	A lot
did you know about holistic	Nothing	knowledge	knowledge	basic	A lot Strongly agree



Is there anything else you would like to share about your general perspectives on holistic representation?

Please indicate the degree to which you agree or disagree with the following statements.

	Strongly disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Strongly agree
The CHIRP model increases the degree to which youth are successfully integrated into the community.	0	0	0	0	0
The CHIRP models supports youth's integration into their sponsor's homes.	\circ	\circ	\circ	\circ	\circ
The CHIRP model increases youth's access to trusted adults to turn to if they face challenges.	0	0	0	0	\circ
The CHIRP model improves youth's access to educational opportunities and services.	\circ	\circ	0	\circ	\circ
The CHIRP model improves youth's access to employment and job training resources.	\circ	\circ	\circ	\circ	\circ
The CHIRP model improves the quality of legal services youth receive.	\circ	\circ	\circ	\circ	\circ

Please share any additional thoughts you have on the impact the CHIRP model has on client experiences.

Is there anything else you would like Acacia or CDSS to know about the impact of the CHIRP program?



Only for Legal Service Staff:

P	lease i	ndicate	the degr	ee to which	vou agree o	or disagree	with the 1	ollowing	statement.
•					,			• • • • • • • • • • • • • • • • • • • •	

	Strongly disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Strongly agree
The CHIRP model improves my ability to provide high-quality, zealous representation for unaccompanied children.	0	0	0	0	0

How does working as part of an integrated team impact the legal services you can provide clients?

Only for Social Service Staff:

How does working as part of an integrated team impact the social services and support you are able to offer clients?

Only for Program Managers:

Prior to CHIRP, did your organization offer in-house social services alongside legal services for unaccompanied children?

\bigcirc	Yes
\bigcirc	No
\bigcirc	Not sure



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Display This Question:

If Prior to CHIRP, did your organization offer in-house social services alongside legal services for... = Yes

Prior to CHIRP, did your organization offer a one-to-one model of holistic representation where one legal representative and one social services professional were teamed together at the outset to support each client served by the program?

O Yes	
○ No	
O Not sure	



The following factors have been identified as barriers to program implementation experienced by LSPs in the CHIRP network. Please indicate the degree to which the following factors posed challenges to successful program implementation at your organization.

	Not challenging	Slightly challenging	Somewhat challenging	Very challenging	Extremely challenging
Hiring Social Services Staff	0	\circ	\circ	\circ	\circ
Hiring Legal Services Staff	0	\circ	\circ	\circ	\circ
Staff Salary Cap	0	\circ	\circ	\circ	\circ
100% FTE requirement	0	0	\circ	\circ	\circ
Differing Professional Standards Related to Mandatory Reporting	0	\circ	\circ	\circ	\circ
Lack of Clinical Supervision Capacity for Social Services Staff	0	\circ	\circ	\circ	\circ
Lack of Staff Experience Working on Interdisciplinary Teams	0	\circ	\circ	\circ	\circ
Team Communication	0	\circ	\circ	\circ	\circ
Lack of funding for supervisory/managerial staff	0	0	\circ	\circ	\circ
Lack of funding for support staff (e.g., paralegals, legal assistants)	0	0	\circ	\circ	\circ



Is there anything else you would like to share regarding barriers to program implementation?

The following factors have been identified as facilitators to program implementation experienced by LSPs in the CHIRP network. Please indicate the degree to which the following factors helped the successful implementation of the program at your organization.

	Not helpful	Slightly helpful	Somewhat helpful	Very helpful	Extremely helpful
Acacia Coordinated Individualized Technical Assistance Providers (Dr. Arielle Balbus and CLINIC)	0	0	0	0	0
Acacia Coordinated Clinical Supervision from Ali Ballard	0	\circ	\circ	\circ	\circ
Acacia Technical Assistance Resources (webinars, trainings, written materials, etc.)	0	\circ	\circ	\circ	\circ
Acacia Coordinated On-Site Training Programs	0	\circ	\circ	0	\circ
Girasol Processing Groups	\circ	\circ	\circ	\circ	\circ
Assigning temporary staff to provide support for CHIRP work during recruitment for full-time staff	\circ	\circ	\circ	\circ	\circ

Is there anything else you would like to share regarding facilitators to program implementation?



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Have any full-	time CHIRP staff hired at your organization left their positions?
O Yes	
O No	
Display This Qu	
If Have an	y full-time CHIRP staff hired at your organization left their positions? = Yes
Please indicate	e any of the following factors that contributed to their decision to leave their CHIRP position.
	CHIRP's future funding precarity
	Salary
	Burnout/emotional nature of the work
	Other



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