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December 10, 2018

The Honorable Alex M. Azar II
Office of the Secretary
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Dear Secretary Azar:

On behalf of the 54,000 members of the American Counseling Association, I am sharing our deep concern by the [recent report](#) from your Inspector General that there are too few mental health counselors at the Tornillo influx care facility for unaccompanied alien children, whom I am going to refer to as refugees. In many cases, their life in their home country was traumatic, leading to the difficult decision to come to the United States. The journey here may have led to additional trauma and hardship.

Being separated from their parents for weeks or months and held in an institutional setting is traumatic and will likely have long-term consequences for these children. The research is clear. When the developing brain is exposed to chronic stress, the response causes lasting changes in brain growth. Adverse childhood experiences (ACEs) have been consistently associated with adverse health effects throughout life, including anxiety, depression and post-traumatic stress disorder (PTSD).

The observations from clinicians who work with these refugee children at the influx facilities is alarming. "Some of the kids are resilient, but many of them suffer from complex trauma, attachment problems, depression, generalized anxiety and social anxiety," one clinician said in a recent report on the situation in Texas. "I see adolescents who still urinate in bed and kids who exhibit self-harming behaviors, like cutting."

Clearly, the facilities being used were not prepared for the number of young children they are now receiving, and far too few of the clinicians at these facilities are trained in strategies such as play therapy and other age-appropriate mental health services. The IG report states that Tornillo was operating with a 1:55 clinician-to-child ratio in October, rather than the 1:12 ratio that the Office of Refugee Resettlement (ORR) generally requires. This may be allowable technically because Tornillo is an influx facility rather than a long term facility. However, with the increasing amount of time these 1,800 refugee children are staying in these facilities, the need for mental health care is obvious.

The Office of the Inspector General's report notes: "...we are concerned that both the current staffing ratio and the ORR [Office of Refugee Resettlement] allowable budgeted staffing ratio are dangerously low. It is unclear how clinician staff at Tornillo could properly assess and respond to the UAC's

[unaccompanied alien children’s] mental health needs 24 hours a day, 7 days a week, given the current and budgeted staffing ratios, particularly for a population believed to have experienced significant trauma.”

The lack of sufficient mental health professionals at Tornillo is only more troubling given the other finding in the IG report—that the 1,300 staff members at the facility were not assessed prior to their employment with FBI fingerprint-based background checks or the child abuse/neglect background checks typically required for anyone working with children in the United States.

In the state of Texas alone, there are more than 23,000 licensed professional counselors. All of them have at least one graduate degree, years of professional experience and a license from the state licensure board. Many are trained to help children such as these. In addition, there are thousands more licensed professional counselors equally prepared to help in the other states where refugee children are being held.

I urge you to increase the number of licensed professional mental health counselors in Tornillo—and around the country—so that each facility reaches the 1:12 clinician-to-child ratio required by the ORR. Providing refugee children with adequate mental health counseling is the right thing to do. And, because these children are here asking to live in the United States, it makes sense to help them survive the trauma of being separated from their parents and being held at an ORR influx facility.

The American Counseling Association stands ready to assist you and your staff with finding caring, compassionate, and realistic solutions to this growing problem.

Sincerely,

A handwritten signature in black ink that reads "Richard Yep". The signature is written in a cursive, flowing style.

Richard Yep, CAE, FASAE
Chief Executive Officer
American Counseling Association

CC: Lynn Johnson, ACF