

Refugee Career Pathways Program Guidelines

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Overview

The Refugee Career Pathways (RCP) program helps resettled refugees¹ get the training and knowledge they need to begin or continue professional careers and to learn about how their career field works in the United States. As an RCP recipient, you will work with each participant to create a detailed career plan. You will provide each participant with counseling to help them learn about career opportunities in the United States and make career-related decisions. You will also help them to find options for training and reskilling. If a participant encounters challenges to making progress toward their career goals, you will help them find solutions.

Post-Award Requirements

Eligible Participants

RCP program participants must be eligible for ORR Refugee Resettlement Program benefits and services, through either their immigration status or category as one of the following:

- Refugee
- Asylee
- Cuban or Haitian entrant
- Iraqi or Afghan Special Immigrant
- Amerasian
- Victim of human trafficking
- Another individual made eligible by law, such as a humanitarian parolee from Afghanistan or Ukraine who arrived under specific circumstances during a defined period

Eligible people also must meet these criteria:

- They are not U.S. citizens
- They have been eligible for ORR services for five years or less when they enroll
- They are authorized to work in the United States, or they provide evidence that they are eligible for and have applied for work authorization
- They are able and willing to begin or continue employment in a professional or skilled career field during the program

More information on eligibility for ORR-funded Refugee Resettlement Program benefits and services can be found at [45 CFR § 400.43](#) and in [ORR policy letters 16-01](#), [22-01](#), and [22-13](#).

ORR will issue a policy letter and let you know if other populations are made eligible by law and can be enrolled in the program.

In addition to the requirements above, projects funded through the Afghanistan Supplemental Appropriations Act, 2022, and the Additional Afghanistan Supplemental Appropriations Act, 2022 can only enroll eligible citizens or nationals of Afghanistan, as described in [ORR PL 22-01 \[PDF\]](#). Afghan humanitarian parolees are only eligible if they arrived in the United States between July 31, 2021, and September 30, 2023 (inclusive), unless they are a qualified family member. Other Afghan nationals who are in another ORR eligible immigration status or category, such as refugee, asylee or special immigrant, are also eligible for funding through the Afghan Supplemental Appropriations Act, 2022 and the Additional Afghanistan Supplemental Appropriations Act, 2022 if they arrive on or after July 31, 2021.

¹ For convenience, the term “refugee” is used to refer to all populations eligible for the ORR Refugee Resettlement Program

You will need to verify the eligibility of each participant when they enroll. If you are unsure whether a candidate is eligible, please contact refugeeeligibility@acf.hhs.gov.

On a case-by-case basis, ORR will consider exceptions for otherwise eligible people who have been eligible for ORR benefits for more than five years. To request an exception, contact your program officer, explaining why the person should be allowed to participate and why they could not enroll in the RCP program during their five years of eligibility. Do not include immigration documents or personal details in the message.

You must comply with applicable civil rights laws to ensure that ORR-eligible populations receive fair treatment, access, and opportunity to participate in ORR funded programs without discrimination on the basis of age, disability, ethnicity, race, color, religion, nationality, sex, sexual orientation, gender identity, or political opinion. Projects legally required to serve specific populations may be limited to these populations (for example, Afghanistan Supplemental Appropriations Act funding can only be used for eligible Afghan citizens or nationals). This nondiscrimination policy complies with the requirements of the Religious Freedom Restoration Act, other applicable federal conscience protections, other applicable federal civil rights laws, and applicable Department of Health and Human Services regulations. For more information, please see [45 CFR § 87.3](#).

You must keep a record of eligibility documentation for each participant. You must enable ORR staff to review it on request. Options for keeping records include:

- Keeping a copy of eligibility documents in the participant's [case file](#)
- Recording details of the document that the participant showed to confirm their eligibility (along with any codes or markings that show eligibility), their date of arrival to the United States or initial date of ORR eligibility, and the name of the staff member who reviewed the documents

Participant Service Period

Enrolled participants may take part in the program for the full period. You do not need to re-enroll a participant each year. You are encouraged not to set time limits for the services you provide. Instead, you should provide services as long as the participant can benefit from them.

Program Service Area

You can only enroll participants within the service area you described in your funding application. ORR will consider exceptions on a case-by-case basis. You may request to expand or change your service area through a change-in-scope amendment.

Enrollment in Other Programs

RCP participants may enroll in other ORR-supported or non-ORR-supported programs as long as those programs provide different services from RCP.

Case File and Documentation Requirements

You must make a case file for each participant, and keep it updated. These files must include all participant information and documents, including:

- Documentation of their eligibility for the program
- Career development plan
- Case notes
- Documentation of all payments made to or on behalf of the participant
- Invoices and receipts for these payments

You must allow ORR staff to review case files upon request. When you are not using the files, they must be secured so that only appropriate staff can access them. If you use an electronic system, you must limit access to the data and use encryption to protect participants' information. If you use a paper system, you must keep files confidential — ideally in a file cabinet that is kept locked and can only be accessed by authorized staff.

Funding Policies

We do not allow the following costs under this program:

- Construction.
- Purchase of real property.
- Major renovation.
- Housing costs, such as mortgages, rent, or security deposits.
- Pre-award costs.
- Transportation or child-care arrangements needed for going to work.

See [45 CFR 75.420 – 75.475](#) for information on costs that are always unallowable or have restrictions.

You may use funding to pay for transportation and child-care needed to participate in career training.

Program Metrics and Outcomes

You must report on the following figures twice a year:

- Number of participants newly enrolled in the program
- Number of participants currently enrolled in the program
- Average income of enrolled participants
- Number of participants developing personalized career plans
- Number of participants enrolling in degree or certification programs
- Number of participants enrolling in apprenticeship or on-the-job training programs
- Number of participants earning college credits
- Number of participants who obtained a new credential or recognition of an existing credential
- Number of participants obtaining employment in a professional/skilled career field
- Number of training hours the program provided to participants in English language programs to prepare for a vocation or job-related training program
- Number of training hours the program provided to participants in developing job readiness skills such as resume writing, interviewing, and expectations for the professional workplace
- Average income of participants who obtained employment

We will give you a form to report this data, along with detailed instructions.

As required by the Paperwork Reduction Act (PRA), ORR has obtained approval from the Office of Management and Budget (OMB) on Data Indicators for post-award reporting.

ORR intends to move towards individual level data reporting collected through the ORR RADS database. ORR will be seeking OMB clearance for this.

Reporting Requirements

You must submit narrative reports to ORR twice a year. The reporting periods are:

September 30—March 30 *Due date: April 30*

March 31—September 29 *Due date: October 30*

You must inform your program officer if you will submit a report late.

Your report must include the [SF-PPR form](#) and the program data sheet. We recommend making a separate document for the narrative rather than putting the narrative in the PPR form, since space is limited.

You must submit your report through the reporting tab in GrantSolutions. If the feature is not working, you may submit your report through Grant Notes.

For information on submitting financial reports, contact your grants specialist at the ACF Office of Grants Management.

Non-Competing Continuation

This section does not apply to projects that were awarded funding in September 2022.

The RCP program period is 36 months, and ORR issues awards for three 12-month budget periods. You must submit a non-competing continuation (NCC) application for your second and third years of funding. ORR will send you a letter with instructions for submitting this application. You are usually required to submit your application within 60 days after the letter is posted to GrantSolutions. You must submit your application through GrantSolutions.

ORR will continue to fund projects after the first and second years based upon:

- Satisfactory performance and attainment of projected goals and enrollment targets
- Approval of non-competitive application for continued funding
- Determination that continued funding is in the federal government's best interest

You can suggest changes in your budget and/or program approach through your NCC. You may not request more funding than the amount for which ORR invites you to apply.

Diversity, Equity, Inclusion, and Accessibility/Lived Experience

ORR recommends that all grant recipients:

- Identify and eliminate barriers that may prevent the full participation of eligible individuals and groups.
- Recruit people with lived experiences to serve as program leadership or staff, on advisory boards or governing structures, or as consultants.
- Ensure agency and project guidelines, staffing, and procedures include perspectives of those with lived experiences.
- Purposefully collaborate and engage with diverse partners and refugee communities to inform service delivery and design.
- Train staff to provide culturally competent service delivery including, when appropriate, the use of interpretation services.

HHS provides multiple resources on the development of equity-centered programming. [HHS' Equity Assessment Tip Sheet](#) describes six steps for conducting equity assessments and provides tips for completing each step.

[Practices to advance equity and support of underserved communities](#) suggests equity tools for ensuring that existing and new programming are accessible and inclusive for all of those engaged. Specific tools included are:

1. [Equity Assessment Tip Sheet](#)
2. [In depth Equity Assessment Guide](#)
3. [Guide on Advancing Equity by Incorporating intersectionality in Research and Analysis](#)

4. [Tips on Equitable Communication](#)
5. [Tips on Engaging Diverse Groups of External Partners](#)
6. [Practices for Meaningfully Engaging People with Lived Experience](#)

Please also see [HHS resources on equity and people with lived experience](#) including:

- Strategies to Equitably Identify People with Lived Experience
- Methods and Emerging Strategies to Engage People with Lived Experience
- Recruiting Individuals with Lived Experience

Indirect Costs

Indirect costs are those for a common or joint purpose across more than one project and that cannot be easily separated by project.

To charge indirect costs you can select one of two methods:

Method 1 — Approved rate. You currently have an indirect cost rate approved by your cognizant federal agency.

Method 2 — *De minimis* rate. Per [45 CFR 75.414\(f\)](#), if you have never received a negotiated indirect cost rate, you may elect to charge a *de minimis* rate. If you are awaiting approval of an indirect cost proposal, you may also use the *de minimis* rate. If you choose this method, costs included in the indirect cost pool must not be charged as direct costs.

This rate is 10% of modified total direct costs (MTDC). See [45 CFR 75.2](#) for the definition of MTDC. You can use this rate indefinitely.

Learn more at [45 CFR 75.414](#), Indirect Costs.

Subawards

The prime recipient must maintain a substantive role in the project. ORR defines a substantive role as conducting funded activities and providing services that are necessary and integral to completing the project. Monitoring your subrecipient's activities alone is not a substantive role.

See [45 CFR 75.352](#) for information on subrecipient monitoring.

ORR does not fund awards where the role of the applicant is primarily to serve as a conduit for passing funds to other organizations unless that arrangement is authorized by statute.

Subrecipients must meet the eligibility requirements found in the funding opportunity.

ORR Policy Letters

You must comply with all policies communicated through [ORR policy letters](#), including future letters that may be published during your project period.

Statutory Authority

This program is authorized by the Immigration and Nationality Act § 412(c)(1)(A), [8 U.S.C. § 1522\(c\)\(1\)\(A\)](#).

Required Program Activities

Participant Agreement

You must give each participant a service agreement when they enroll. They must read, sign, and date the agreement. The agreement must be specific to the program and include information on:

- Services available through the program
- Expectations and requirements for the participant
- The participant's process for grievances

Participants must be able to review the document in their preferred language. You can provide translated copies or interpretation. For participants with limited English proficiency, you must document that translation or interpretation was provided. The date the participant signs the agreement is considered the date of enrollment. You must not provide RCP-funded services to any participant before they sign the agreement.

Career Development Plan

You must create a career development plan for each participant that includes the following:

- The participant's desired career path
- A list of skills the participant has that are required or useful in their desired career path
- A list of the participant's credentials, degrees, and/or education
- Information on the participant's relevant employment experience, on-the-job training, internships, apprenticeships, etc.
- A list of skills, credentials, degrees, or education the participant will need to be successful in their desired career path
- Strategies to get the qualifications needed for employment in their desired field
- Goals and action steps to be completed throughout the RCP service period and beyond which are directly tied to their ultimate career goals
- A list of barriers to employment and advancement and how they will be resolved, if applicable
- A list of potential employers and roles in their field available locally
- Any costs associated with the participant's career goals or to support their career goals, if applicable

You must create the plan with the participant. The plan must be focused on the participant's desired career pathway. The plan must not support employment in positions that are not relevant to their desired career path. Career development plans must be living documents. You must update plans as goals and actions are completed or changes in the participant's trajectory occur. As living documents, signature should not be required for the plan.

Career Counseling

You must connect each participant with a career coach or navigator. The coach must schedule regular discussions with the participant to track progress toward career goals and completion of action steps. The coach must have information on opportunities for vocational training, education, and certification. The coach must ensure that each active participant is making continuous progress in career development to the best of the participant's ability. The coach must not limit their interactions to simply checking that a participant has attended class or has no immediate needs.

Connection with Career Training

You must connect each participant to training opportunities relevant to their desired career path. Training must result in gaining skills required to achieve career goals as outlined in the participant's career development plan. You must partner as needed with training providers, educational institutions, and local workforce boards to ensure that each participant has access to appropriate training opportunities within their desired career path. You are encouraged to seek creative solutions to accommodate participants' schedules with training such as online, evening, and weekend courses. You must ensure that enrollment, trainings, certifications, and licensing are completed by qualified entities.

Partnerships

If your organization is not an educational institution, within 90 days of award, you must sign a memorandum of understanding (MOU) or memorandum of agreement (MOA) with an educational institution that serves the same geographic area as your RCP project. Examples of educational institutions include, but are not limited to, universities, community colleges, and vocational training centers. An institution that focuses on only one profession, such as driving or health care, does not fulfil this requirement. The MOU/MOA must describe how you will collaborate to connect participants with training opportunities that support their career goals and to expand access to career training for refugees.

If your organization is an educational institution, you must sign an MOU/MOA that meets the requirements above with an organization focused that serves refugees. This must be either a refugee resettlement agency or another organization with programming specifically for refugees and/or other eligible populations.

You must inform ORR if the MOU/MOA is terminated for any reason, or if the partnership becomes inactive. You must then identify a new partner and sign an MOU/MOA that meets the requirements above as soon as possible.

Annual Program Meeting

ORR holds a program meeting each year where recipients exchange best practices, discuss common problems, and hear from subject matter experts. At least one staff member from every recipient must participate. The meeting is typically held at the ACF headquarters in Washington, DC. ORR will let you know if the meeting will be held somewhere else. Staff members may participate remotely, but we encourage you to send at least one member in person to strengthen relationships with other recipients.

Optional Program Activities

Direct Financial Assistance

You may provide direct financial assistance to RCP participants if you have included it in your project budget. Direct financial assistance must directly support a career development activity included in the participant's career plan.

Direct financial assistance means any funding you spend on behalf of an individual participant.

Examples include:

- Tuition for degree and/or certification programs
- Licensing and exam fees
- Credential evaluation services
- Textbooks, software, and other supplies needed for career-related courses and exams

- Uniforms and safety gear
- Transportation to and from career development activities
- Child care while participating in career development activities

FOR PROJECTS FUNDED PRIOR TO 2024:

Direct financial assistance is limited to \$3,500 per participant per year the participant is enrolled in the program. For example, if a participant enrolls in the program on April 1, you may provide up to \$3,500 in direct financial assistance until March 31 of the following year. On April 1 of that year, the participant becomes eligible for up to \$3,500 in direct financial assistance until March 31 of the following year.

FOR PROJECTS FUNDED IN 2024 AND AFTER:

Direct financial assistance is limited to \$12,000 for the full 36-month program period.

Whenever possible, direct financial assistance must be paid directly to the vendor (e.g., university, bookstore, transit company). If the participant is required to pay for a service directly, you must give written approval in advance of purchase, and the participant must provide a receipt or some other proof of payment.

Career Resources

You may use RCP funds to develop career resources such as guidebooks, training videos, and lists of training providers. All printed or web-published materials must state that they were developed with ACF/ORR funds. ORR will provide the required text.

Do not include the logos of HHS, ACF, or ORR on resources you create.

Mentorship and Expertise Sharing

You may include mentorship and expertise sharing activities as part of your RCP project. This may include:

- Matching participants with mentors
- Forming mentorship discussion groups
- Holding a speaker series
- Making video or audio recordings of experts in their fields

Collaboration with Other RCP Projects

ORR will offer regular opportunities for you to collaborate and discuss topics of common interest with other recipients. You are highly encouraged to participate in and contribute to these discussions.

Other Activities

You may carry out other activities that support the goals of the RCP program if they are approved in your application for funding or a change-of-scope amendment.