

# Afghan Extended Case Management and Extended Community Orientation Allowable Under ORR ASA Funding

Policy Letter 23-03

Initially published June 6, 2023 Revised June 21, 2023<sup>1</sup> Revised September 19, 2023<sup>2</sup>

Within the Office of Refugee Resettlement's (ORR) Policy Letter (PL) 22-03, ORR provided guidance on the provision of Refugee Support Services (RSS) to select groups of Afghan citizens or nationals, as authorized by the Afghanistan Supplemental Appropriations Act, 2022 (ASA) and succeeding legislation.<sup>3</sup> ORR is issuing this PL to augment the information within the "Other Notable Activities Allowable Under the ASA" section of ORR PL 22-03 by noting that states<sup>4</sup> may, and are encouraged to, use ASA RSS base<sup>5</sup> funding for extended case management and extended community orientation.

ORR assessment and monitoring of initial ASA RSS base services indicates a need for additional support for Afghan Humanitarian Parolees to successfully integrate. As such, ORR is authorizing the use of ASA RSS base funding for community-based initiatives that extend case management and community<sup>6</sup> orientation activities beyond the initial 90 days that eligible Afghans may receive under the Department of State's Bureau of Population, Refugees, and Migration (PRM) programming. This PL does not authorize changes to any ASA RSS set-aside program funds or services.<sup>7</sup>

ORR encourages that the extended case management and extended community orientation activities provided through ASA RSS base funding complement and be coordinated with services offered under other ORR programs (e.g., the RSS Refugee Health Promotion [RHP]

<sup>&</sup>lt;sup>1</sup> June 21, 2023 revisions are footnoted.

<sup>&</sup>lt;sup>2</sup> September 19, 2023 revisions are footnoted.

<sup>&</sup>lt;sup>3</sup> Additional Afghanistan Supplemental Appropriations Act, 2022; the Continuing Appropriations and Ukraine Supplemental Appropriations Act, 2023; and the Consolidated Appropriations Act, 2023.

<sup>&</sup>lt;sup>4</sup> "States" throughout this PL refers to states and replacement designees.

<sup>&</sup>lt;sup>5</sup> June 21, 2023: "Base" added after each incidence of "ASA RSS" throughout the PL to clarify that the PL does not address ASA RSS set-aside programming

<sup>&</sup>lt;sup>6</sup> June 21, 2023: Replaced "cultural" with "community" to distinguish this programming from PRM-funded pre-departure "cultural" orientation

<sup>&</sup>lt;sup>7</sup> June 21, 2023: Added to clarify that the PL does not address ASA RSS set-aside programming

set-aside, Preferred Communities [PC], and Services to Afghan Survivors Impacted by Combat [SASIC]). Extended case management and extended community orientation activities provided through ASA RSS base funding may not duplicate or supplant services offered under other ORR programs.<sup>8</sup>

#### I. Eligible Populations

ORR delineates eligible populations for ASA services and the timeframe for those populations' ASA eligibility in ORR PL 22-01. Afghan humanitarian parolees are eligible from their eligibility date until March 31, 2023, or the end of the individual's parole term, whichever is later, unless otherwise amended by law or the individual gains another ORR-eligible category or status. Other eligible Afghan populations are eligible for the traditional ORR eligibility timeframe defined under 45 CFR Part 400.

## II. Emphasis on Local Afghan-led Community Organizations and Culturally Relevant Collaborations

ORR encourages collaboration between states and entities working directly with Afghan populations, including Afghan-led community-based organizations that have served recent Afghan arrivals outside of the traditional PRM refugee resettlement network. States and existing sub-recipients are encouraged to subcontract with such entities to enhance needs assessment, appropriate and high-quality service provision, and local staff capacity.

#### III. Extended Case Management and Community Orientation Activities

States and grantees are encouraged to provide extended case management and extended community orientation to the Afghan population as delineated herein. States and grantees are also urged to conduct outreach to potential clients about extended case management and extended community orientation activities in coordination with Afghan communities and other federal, state, and local outreach efforts.

#### A. General Description of Extended Case Management

Extended case management is designed to address continuing or new needs of resettled Afghan individuals or families. States and grantees must ensure that contracted providers refer clients to a community organization that has knowledge and capacity for serving this population—preferably an Afghan-led community organization—to provide extended case management support, as available. States must ensure that organizations providing extended case management know of the full range of ORR-funded programming and refer eligible Afghans to services as appropriate, including English language, employment, health, mental health, legal assistance, and RHP set-aside and PC programs' 10 support services. Additional services to promote social and economic well-being can include referrals for support with long-term housing 11 and other integration needs.

<sup>&</sup>lt;sup>8</sup> June 21, 2023: This paragraph added.

<sup>&</sup>lt;sup>9</sup> If an individual's parole term is extended by the Department of Homeland Security (DHS) or if DHS renews the individual's parole, the individual is categorically eligible to continue or resume ORR Refugee Resettlement Program benefits and services based on the individual's original date of eligibility.

<sup>&</sup>lt;sup>10</sup> June 21, 2023: Added to ensure that states are aware that legal assistance is an allowable activity and to include RHP set-aside services in addition to those provided by the PC program.

<sup>&</sup>lt;sup>11</sup> June 21, 2023: Removed "employment" and "mental health," which are included in the sentence above.

ORR expects extended case management to be coordinated <sup>12</sup> with other RSS funded programs. If the client already has an established Family Self-Sufficiency Plan (FSSP) associated with RSS employment services, extended case management should support the goals and activities delineated within. If a client does not have an established FSSP and is required to have one as defined in ORR Policy Letter 21-06, the organization providing extended case management must use an FSSP to guide and track the client's progress. If the client is not required to have an established FSSP, the organization providing case management may use an FSSP or similar case plan tool to support the client in meeting their individual case management needs.

### B. General Description of Extended Community Orientation

States and grantees are encouraged to provide extended community orientation to facilitate the adjustment, empowerment, and self-sufficiency of Afghans through activities that aim to cultivate mutual assistance and community support. The general goals of community orientation are to assist the participant to develop knowledge about the community, skills to navigate their new environment, and attitudes that facilitate successful resettlement and reintegration. ORR encourages that ASA-funded extended community orientation focus on helping Afghans develop realistic expectations for resettlement.

#### C. Recommendations for Extended Community Orientation

- 1. ORR encourages states to provide train-the-trainer instruction to Afghan-led community organizations on the delivery of community orientation, to both increase coverage throughout the community and provide professional development to Afghan community leadership.
- 2. States and grantees are encouraged to provide services and tailored community orientation sessions based on identified needs of families within each community, such as:
  - a. Interpreting presentations or translating local resources
  - b. Providing in-home discussion of landlord-tenant responsibilities and reiterating how various items work in clients' homes (e.g., washing machines, thermostats)
  - c. Hosting walking or guided tours showing participants the locations of key community services (e.g., police station, fire station, hospital), how to identify those services, how to understand road signs, etc.
  - d. Providing Afghan newcomers information about how to navigate systems (e.g., transportation, healthcare, schools, banks, taxes) and then helping them build the skills and confidence to do so independently
- 3. ORR recommends that states provide support group orientation sessions led by a staff member from the Afghan community or in partnership with a leader from the Afghan community. If possible, a trauma-informed facilitator should be identified. By matching the facilitator's cultural lens to that of the clients, sensitive messaging can be shared through storytelling, rather than through formal instruction. Support group orientation sessions should include targeted discussions on challenges that might exist around topics including, but not limited to:

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<sup>&</sup>lt;sup>12</sup> June 21, 2023: Changed to correct sentence structure

- a. ESL/Education
- b. Housing
- c. Employment
- d. Health and/or<sup>13</sup> Mental Health
- e. Transportation

#### D. <u>Virtual or Remote Option</u>

While in-person extended case management and extended community orientation is the preferred method of delivery, states and grantees may provide these services virtually or as part of a remote model as necessary to reach isolated individuals and communities. This service delivery may include common case management practices of information and referral, assessment and goal setting, work with individuals and families, and group work (e.g., community orientation group sessions, psychoeducational support groups).

#### IV. Procurement

A significant number of Afghans arrived during the rapid-paced Operation Allies Welcome and did not receive adequate initial case management and orientation. ORR therefore encourages states to bypass standard procurement guidelines regarding competition through September 30, 2024<sup>14</sup>, to facilitate the provision of extended case management and extended community orientation services as quickly as possible (see also 45 CFR § 75.329(f)(2)).

#### V. Equity and Inclusion

Within its **Equity Action Plan**, ORR stresses the importance of advancing equity in all its programming, consistent with the Executive Order (E.O.) on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (**E.O. 13985**), the E.O. on Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (**E.O. 14091**), and the **ACF Equity in Action Statement**. ORR urges all states to commit to the following:

- Use an equity lens when developing new programming, to ensure that, unless otherwise specified,<sup>15</sup> all ORR-eligible populations, regardless of race, religion, gender identity, sexual orientation, disability, or other characteristic(s), receive fair treatment, access, and opportunity;
- Review existing programming with an equity lens; and
- Identify and eliminate barriers that may prevent the full participation in ORR programs.

ORR also strongly encourages states to practice inclusion, through purposeful collaboration and engagement with relevant communities to inform service design and delivery.

ORR hopes to facilitate intentional programming that fully meets the needs of all populations; innovation and ingenuity in program design, outreach, and partnerships; and increased and equitable access to digital services and digital literacy. ORR requests that states dedicate focus

<sup>&</sup>lt;sup>13</sup> June 21, 2023: Added

<sup>&</sup>lt;sup>14</sup> September 19, 2023: September 30, 2023 replaced by September 30, 2024.

<sup>&</sup>lt;sup>15</sup> "Unless otherwise specified" is used to capture circumstances in which Congress may choose to specify the use of ORR funds, customarily in circumstances Congress deems emergent. For example, in the Afghanistan Supplemental Appropriations Act, 2022, Congress appropriated funds in support of citizens and nationals of Afghanistan.

to outcomes and data analysis to ensure that states and ORR can identify the impacts of this funding, enabling the adjustment of priorities to address gaps as needed.

#### VI. Reporting and Monitoring

ORR is not adding any new specific reporting and monitoring requirements for clients receiving extended case management and/or extended community orientation through ASA RSS base funding. However, the standard ASA RSS reporting requirements delineated below still apply.

States must describe ASA RSS funded extended case management and extended community orientation activities in their state plans and are encouraged to ensure appropriate mechanisms to assess the need for, and track, all assistance provided to Afghan arrivals. States are encouraged to develop and track specific, measurable, achievable, relevant, and time-bound (SMART) annual program outcomes for all ASA-funded RSS base (and RSS set-aside) activities. States must report the number of clients served, the type and frequency of services provided, outcomes, accomplishments, and challenges in the ORR-6 Program Performance Report (ORR-6) semi-annual schedules A, C, and D, and submit the ORR-6 Annual Service Plan. States must also submit the annual RSS Sub-Grantee Report (Office of Management and Budget Clearance Number 0970-0556). These forms, instructions, and the reporting schedule are available on the ORR website.

States are required to submit data for all enrollments, including those enrollees served through ASA-funded RSS (and set-asides), within ORR's State Arrival and Service Data Collection Process, using the ORR-5 data collection form. Instructions for the ORR-5 are also on the ORR website. States must also submit the Standard Form 425, Federal Financial Report through the Payment Management System (PMS) on a quarterly basis. For questions regarding PMS, please contact the PMS Help Desk at 877.614.5533 or pmssupport@psc.gov.

ORR will monitor ASA-funded awards through routine monitoring activities to ensure that states are in compliance and the services provided meet the needs of ASA-eligible populations. ORR will review a state's annual program outcomes and progress towards each goal. Additionally, ORR will assess how services are provided, identify promising practices, and observe trends for further analysis and information sharing. ORR may create additional monitoring activities for ASA-eligible individuals. States are responsible for monitoring subrecipients for compliance and achievement of objectives as outlined in their approved state plan.

If you have questions about the information contained in this PL, contact ORR's Refugee Policy Unit at RefugeePolicy@acf.hhs.gov.

Sincerely,

Robin Dunn Marcos Director Office of Refugee Resettlement