

**OFFICE OF REFUGEE RESETTLEMENT
WILSON/FISH ALTERNATIVE PROGRAM
FY 2015-2016 PROGRAM GUIDELINES**

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I. INTRODUCTION

These guidelines are provided to grantees under the Wilson/Fish (WF) alternative program to assist them in their delivery of services and assistance to eligible populations. The purpose of the WF program is to establish an alternative to the traditional state administered refugee assistance program through the provision of integrated assistance (cash and medical) and services (employment, case-management, English as a Second Language (ESL) and other social services) to refugees in order to increase early employment and self-sufficiency prospects. In addition, the WF program enables refugee assistance programs to exist in every State where refugees are resettled.

The statutory authority for the WF program was granted in October, 1984, when Congress amended the Immigration and Nationality Act (INA) to provide authority for the Secretary of Health and Human Services to implement alternative projects for refugees. This provision, known as the Wilson/Fish Amendment, Pub.L. 98-473, 8 U.S.C. 1522(e)(7), provided:

"(7)(A) The Secretary shall develop and implement alternative projects for refugees who have been in the United States less than thirty-six months, under which refugees are provided interim support, medical services,¹ support services, and case management, as needed, in a manner that encourages self-sufficiency, reduces welfare dependency, and fosters greater coordination among the resettlement agencies and service providers...

(B) Refugees covered under such alternative projects shall be precluded from receiving cash or medical assistance under any other paragraph of this subsection or under title XIX or part A of Title IV of the Social Security Act.

(C) "..."

(D) To the extent that the use of such funds is consistent with the purposes of such provisions, funds appropriated under section 414(a) of this Act, part A of Title IV of the Social Security Act, or Title XIX of such Act, may be used for the purpose of implementing and evaluating alternative projects under this paragraph."

The WF Program is also referenced in the Office of Refugee Resettlement (ORR) regulations under the heading Alternative RCA Programs at 45 C.F.R. § 400.69:

"A state that determines that a public/private RCA program or publicly-administered program modeled after its TANF program is not the best approach for the State, may choose instead to establish an alternative approach under the Wilson/Fish program, authorized by INA section 412(e)(7)."

The ORR regulations at 45 C.F.R. §400.301 also provide authority to the ORR Director to select a replacement to respond to the needs of the state's refugee population if a state withdraws from the refugee program:"...when a State withdraws from all or part of the refugee program, the Director

¹ Since 1991, the RCA/RMA time eligibility period has been 8 months from date of arrival/attainment of legal eligibility status for refugee benefits.

may authorize a replacement designee or designees to administer the provision of assistance and services, as appropriate, to refugees in that State" (see page 14 - "Statewide Coordination").

Neither the statute nor regulations mandate a competitive review process for determining a WF grantee. However, the statute does require as follows:

No grant or contract may be awarded under this section unless an appropriate proposal and application (including a description of the agency's ability to perform the services specified in the proposal) are submitted to, and approved by, the appropriate administering official. Grants and contracts under this section shall be made to those agencies which the appropriate administering official determines can best perform the services 8 U.S.C. § 1522(a)(4)(A).

ORR with the Administration for Children and Families (ACF) concurrence has concluded a competitive review process is not cost effective, not in the best interest of the government, and not a practical fit for the WF program. ORR also, in accordance with the law cited above, will require that appropriate proposals and applications are submitted and that a determination is made that the grantees are the ones that can "best perform" the services. Therefore funding under this program is open only to those agencies that currently administer a WF program. The WF program has the regulatory authority as cited above to expand sites in the future as necessary if a state withdraws from the refugee program or if a state proposes to switch its current RCA model to the WF model.

WF grantees which include States, voluntary resettlement agencies (local and national), and a private non-profit agency that oversees a local voluntary resettlement agency administer 12 state-wide WF programs in the following States: Alabama, Alaska, Colorado, Idaho, Kentucky, Louisiana, Massachusetts, Nevada, North Dakota, South Dakota, Tennessee and Vermont, plus one county-wide program in San Diego County, California. The WF programs in these locations are currently administered by the following agencies:

Alabama: USCCB - Catholic Social Services

Alaska: USCCB - Catholic Social Services

Colorado: Colorado Department of Human Services

Idaho: Janus Inc. (formerly Mountain States Group), Idaho Office for Refugees

Kentucky: USCCB – Catholic Charities of Louisville, Kentucky Office for Refugees

Louisiana: USCCB - Catholic Charities Diocese of Baton Rouge, Louisiana Office for Refugees

Massachusetts: Office for Refugees and Immigrants

Nevada: USCCB - Catholic Charities of Southern Nevada

North Dakota: LIRS - Lutheran Social Services of North Dakota

San Diego County, CA: USCCB - Catholic Charities Diocese of San Diego

South Dakota: LIRS - Lutheran Social Services of South Dakota

Tennessee: USCCB - Catholic Charities of Tennessee, Tennessee Office for Refugees

Vermont: USCRI - Vermont Refugee Resettlement Program

II. ELIGIBILITY

ORR Eligible Client Population

To be eligible for WF funded programs and services, grantees must ensure refugees² meet all requirements of 45 C.F.R. 400.43, "Requirements for documentation of refugee status". Eligibility for refugee program services and assistance also includes: Asylees³, Cuban Haitian Entrants⁴; Certain Amerasians⁵ from Vietnam; Victims of Severe Forms of Trafficking⁶; Special Immigrant Visa Holders⁷.

All eligible individuals will be referred to as "refugees" or "clients" in these guidelines, unless the context indicates otherwise. For more details on documentary proof of the above statuses and all other ORR eligible populations, including statutory and regulatory authorities, visit the [ORR website](#).

III. PROGRAM DESCRIPTION

Under the WF program guidelines, the grantee will provide interim financial assistance, medical assistance (if applicable), employment services, case management and other social services to refugees in a manner that encourages self-sufficiency, and fosters greater coordination among voluntary agencies and other community-based service providers. An integrated system of assistance and services is an essential characteristic of a WF program. Services and assistance under this program are intended to help refugees attain self-sufficiency within the period of support defined by 45 CFR 400.211.⁸ This period is currently eight months from date of arrival in the U.S. (for refugees and SIVs); the date of adjustment of status if applying for Special Immigrant Status within the U.S (SIVs); the date of final grant of asylum (for asylees); the date a Cuban/Haitian becomes an entrant⁹; the date of certification or eligibility letter for Victims of Severe Forms of Trafficking.

² The term "refugees" used in this guideline is intended to encompass all persons who are eligible to participate in refugee program services, including: refugees, asylees, Cuban and Haitian entrants, certain Amerasians, Special Immigrants from Afghanistan and Iraq, and Victims of a Severe Form of Trafficking who receive certification or eligibility letters from ORR.

³ Asylees admitted under section 208 of the Immigration and Nationality Act.

⁴ Cuban and Haitian entrants under section 501 of the Refugee Education Assistance Act of 1980 (P. L. 96-422);

⁵ Certain Amerasians from Vietnam, including U.S. citizens, under title II of the Foreign Operations, Export Financing, and Related Programs Appropriations Acts, 1989 (P. L. 100-461), 1990 (P. L. 101-167), and 1991 (P. L. 101-513); certain Amerasians from Vietnam, including U.S. citizens, under title II of the Foreign

Operations, Export Financing, and Related Programs Appropriations Acts, 1989 (P. L. 100-461), 1990 (P. L. 101-167), and 1991 (P. L. 101-513);

⁶ Victims of a Severe Form of Trafficking as required by section 107(b)(1)(A) of the Victims of Trafficking and Violence Protection Act of 2000 as amended (P. L. No. 106 -386) (22 U.S.C. § 7105(b)(1)(A)). For details about these statuses, see ORR State Letter #00-17 and ORR State Letters #01-13 as modified by ORR State Letter #02-01, and ORR State Letter #04-12 on the Trafficking Victims Protection Act, at www.acf.hhs.gov/programs/orr;

⁷ Special Immigrants (SIV) from Afghanistan and Iraq admitted under Section 525 of Title V of Division G of Public Law 110-161, "The Consolidated Appropriations Act, 2008" Sec. 1244 of Subtitle C of Title XII of Public Law 110-181, "The National Defense Authorization Act for Fiscal Year 2008," "Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009," Public Law 110-329, at Section 101 of Division A, Section 602 of Pub. L. No. 111-08, the "Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Act, 2009," Section 8120 of Pub. L. No. 111-118, "Department of Defense Appropriations Act, 2010" (Dec. 19, 2009; 123 Stat. 3409).

⁸ Even though the focus of the WF program is the first eight months upon arrival, refugees remain eligible to receive refugee social services for five years upon arrival to the U.S.

⁹ A Cuban or Haitian becomes a Cuban/Haitian Entrant on the date he/she is (1) granted parole, (2) placed in removal proceedings, or (3) has a pending application for asylum (whichever is first). See also [ORR State Letter #10-03](#)

WF programs provide assistance and services to refugees for the purpose of enhancing refugee self-sufficiency. Some examples include: (1) where assistance and services for refugees receiving RCA and those receiving Temporary Assistance for Needy Families (TANF) could be provided in a better coordinated, effective, and efficient manner; (2) where the payment rate for RCA and TANF is well below the ORR payment rates listed in the ORR regulations at 45 C.F.R. section 400.60; (3) where TANF-eligible refugees may not have access to timely, culturally and linguistically compatible services in the provision of employment and training programs; (4) where existing options for delivery of services and assistance to refugees do not present the most effective resettlement in that location, and where resettlement could be made more effective through the implementation of an alternative project; (5) where the continuity of services from the time of arrival until the attainment of self-sufficiency needs to be strengthened; or (6) where it is in the best interest of refugees to receive assistance and services outside the traditional TANF system.

WF programs have the flexibility to design programs tailored to the refugees' needs, assets, and environment of the resettlement community.

There are seven main elements of WF programs that allow them to be distinguished from the traditional ¹⁰state-administered refugee resettlement programs:

- a. They may serve TANF eligible clients in addition to RCA clients.
- b. The provision of cash assistance, case management and employment services are integrated and administered generally under a single agency employing a "one stop shop" model that is culturally and linguistically equipped to work with refugees.
- c. The cash assistance element may be administered and/or delivered by the state or a private entity.
- d. Monthly RCA payment levels may exceed state TANF payment levels (up to the PPP levels outlined under 45 C.F.R. §400.60).
- e. WF programs utilize innovative strategies for the provision of cash assistance, through incentives, bonuses and income disregards which are tied directly to the achievement of employment goals outlined in the client self-sufficiency plan.
- f. Refugee Medical Assistance (RMA) may be administered by a private entity.
- g. WF programs provide intensive case management to refugees who are determined to have special needs.

Funding for the WF program is made available under the Transitional Assistance and Medical Services (TAMS) and Social Services line items. Under TAMS, WF grantees receive WF-Cash and Medical Assistance (WF-CMA) discretionary funds which are awarded through cooperative agreements to cover RCA, RMA (if privately administered), intensive case management, statewide coordination and RCA/RMA administration costs. WF-CMA discretionary grants are awarded based on a budget of estimated costs for providing up to eight months of RCA and RMA (if applicable) to eligible refugees and up to one year of intensive case management, as well as for the identifiable and reasonable administrative costs associated with providing RCA and RMA and statewide coordination. WF-CMA is a cost reimbursement grant. Any unobligated balances will be used as an offset to the following

¹⁰ The "traditional" state administered program operates through the state welfare/TANF agency in which the provision of RCA and referrals for employability services are all administered by the state.

year's award for this grant.

Funds for employment and other social services under the WF program are provided through the formula Refugee Social Services (RSS) grant. RSS funding is based upon each state's arrivals over the prior two fiscal years, adjusted for secondary migration. These allocations are listed in the Final Social Services Notice. WF RSS grants are for services defined in 45 C.F.R. §§400.154/155 of the ORR regulations. **Grantees must submit an annual plan of services (45 C.F.R. §400.11) and an annual WF Social Services budget.**¹¹

The approved WF application and signed cooperative agreement serves as the umbrella covering all services and assistance that operate under the authority of the WF program. The WF requirements listed in these guidelines are applicable to all program components which are funded through the WF-CMA discretionary and RSS formula funds.

IV. PROGRAM SERVICES

WF programs must generally adhere to the same governing regulations as states unless otherwise agreed and approved by ORR. Title 45 of the C.F.R. Part 400 contains information on the purpose of the refugee program, State plans and the award of grants, general administration of the program, identification and documentation of refugees, RCA, employability services, RMA, child welfare services, RSS, federal funding of the refugee program, waivers and withdrawals, and targeted assistance funding. The sections of the regulations from which privatized WF programs are exempt are described under 45 C.F.R. § 400.301 (c) and include: 45 C.F.R. §§400.5(d), 400.7, 400.51(b)(2)(i), 400.58(c), 400.94(a), 400.94(b), 400.94(c), and subpart L (unless authorized by the Director as the replacement designee for TAG programs).

The approved WF application serves as the de-facto state plan for those services included. Other services that are provided outside the scope of the WF program (usually medical and unaccompanied refugee minor (URM) services) must be described separately as part of a separate state plan submission; adhering to ORR checklist format (OMB 0970-0351) and budget requirements outlined in the ORR-1 CMA budget estimate form/instructions and in ORR State Letters #12-13 and #13-03. WF programs are expected to compile a policy and procedures manual pertaining to the provision of assistance and services provided under the WF program.

The WF programs are responsible for the quality of all required services and for ensuring that they are provided in a manner that is culturally and linguistically compatible with a client's background and needs. In particular, the agency will ensure that language assistance is provided to Limited English Proficiency (LEP) clients in accordance with ORR State Letter #05-20.

A. Refugee Cash Assistance (RCA)

Funding Source: WF-CMA

Objective: The objective of cash assistance is to provide adequate financial support to meet the

¹¹ In Vermont, the state, (Agency for Human Services) administers the formula RSS program; it subcontracts funds for employability services to the WF program.

subsistence needs of the refugee for up to eight months upon arrival to the United States.

WF Eligibility: Consistent with section 412(e)(7)(B) of the INA, refugees that receive cash assistance under the WF program may not also receive cash assistance under the TANF program during the period of support provided under the WF program. However, TANF recipients may be eligible to receive a WF differential payment in those WF states where the TANF payment rate is lower than the WF payment rate listed under 45 C.F.R. §400.60 of the ORR regulations. The provision of a differential payment to TANF type refugees will enable all newly arrived refugees in the state to receive the same payment level for the first eight months upon arrival to the United States. The following criteria must be met before ORR will consider providing CMA funds to TANF type refugees:

1. The state TANF rate is lower than the ORR WF rate listed at 45 C.F.R. §400.60 and,
2. The state provides the full amount of TANF funding to the refugee or to the WF agency to be used on behalf of the refugee,
3. The state disregards the WF differential payment for the purpose of determining financial eligibility for state TANF and Medicaid (WF agencies could consider offering the differential RCA payment in the form of a direct vendor payment to ensure that this assistance will not negatively impact the refugees' financial eligibility for state/federal means tested programs),
4. The state TANF agency agrees to coordinate with the WF and/or state refugee agency to ensure that TANF type refugees have access to employment and other social services that meet their cultural and linguistic needs.

General Eligibility: Eligibility for RCA is determined by program site staff based on 45 C.F.R. §§ 400.50, 400.51, 400.52, 400.53, 400.59 and 400.62. Clients eligible for TANF (upon ORR approval) may also be eligible to receive WF-RCA in the form of a differential payment when the state TANF payment rate is lower than the WF rate. Clients that are eligible for SSI, are not eligible for WF RCA and may only receive RCA until cash assistance under the SSI program is provided. Married spouses joining family members in the U.S. should not be treated as single – the income and resources of the spouse who first arrived to the U.S should be considered when determining eligibility of the later arriving spouse. An adult child of 18 years or older is treated as a separate case. (See definition for "splitting cases.")

WF sites must link continued eligibility for the receipt of cash assistance to compliance with the Family Self-Sufficiency Plan developed jointly by the client, the case manager, and the employment specialist. Compliance is to be monitored by the case manager or other staff assigned by the WF Director.

Monthly Re-determination: All sites must have a process for determining continued eligibility for cash assistance on a monthly basis. Eligibility must be linked to compliance with the Family Self-Sufficiency Plan (FSSP) and to income from employment. Cash assistance payments should be reduced on the basis of income from employment after factoring in applicable disregards. Case files shall contain a copy of paychecks to substantiate eligibility for employment based incentive payments and documentation showing compliance with the FSSP. Also, WF agencies

must maintain procedures for ensuring recovery of over-payments and the correction of underpayments in accord with C.F.R. §400.49.

Refugee Cash Assistance Payment Levels: RCA payment levels are determined by the program and approved by ORR in accordance 45 C.F.R. §400.60. Cash assistance should begin at the date of application.

Incentives and Bonuses: Income disregards and other incentives may be developed to support the client's entry into employment as soon as possible within the parameters of the FSSP. The incentive is not an entitlement. Incentives may include but are not limited to: a bonus for becoming employed, a bonus for job retention of 90 days, or an income disregard.

B. Refugee Medical Assistance/Refugee Medical Screening

Funding Source: WF-CMA

Objective: To ensure that refugees not eligible for state Medicaid and CHIP have access to medical services comparable to those provided by state Medicaid.

WF Eligibility/Scope:

Although ORR has included the provision of medical assistance as an allowable activity under these guidelines, the best medical assistance option available in most circumstances is the existing state-administered program of RMA, as well as Medicaid and CHIP. The option to provide medical assistance under these guidelines is available only (a) where a state chooses to discontinue participation in all areas of the refugee program, including the provision of refugee medical assistance; or (b) in the event that there are significant problems in the provision of medical assistance and/or medical screening to refugees in a state and where an alternative private medical assistance plan or provider is available that is able to provide a more appropriate and a timely range of services for refugees at an affordable cost.

1. If alternative medical assistance is included, participants are precluded from receiving Medicaid/CHIP during the period of support provided under the WF project. However, please refer to point 2, noting that WF programs are required to first ensure that individuals seek Medicaid/CHIP coverage if they are eligible.
2. In WF programs that choose to privatize health and medical services for refugees ineligible for Medicaid/CHIP, the WF program will work with ORR to determine how best to provide these services to eligible populations. Currently, privatized RMA is provided at two sites through a private insurer.
3. In other WF programs where RMA is provided through the state and outside the scope of the WF program, WF agencies shall coordinate with the state to ensure that refugees access medical assistance and health screening services provided through the state Medicaid/CHIP or RMA program.

Applicable ORR Regulations:

1. Opportunity to apply for medical assistance (45 C.F.R. §400.93)
2. Determination of eligibility for Medicaid (45 C.F.R. §400.94)¹²
3. General eligibility requirements (45 C.F.R. §400.100)
4. Financial eligibility standards (45 C.F.R. §400.101)
5. Consideration of income and resources (45 C.F.R. §400.102)
6. Continued coverage of recipients who receive increased earnings from employment (45 C.F.R. §400.104)

Medical Screening:

Medical screening is covered under the CMA formula program (see 45 C.F.R. §400.107; ORR State Letter #12-09 for Medical Screening Guidelines with corresponding reimbursement rates; State Plan and ORR-1 requirements are applicable).¹³

C. Intensive Case Management

Funding Source: WF-CMA; refugees who are not determined to need intensive case management should receive case management services supported by WF-RSS funds.

Objective: To ensure that services are provided in a planned, effective, and timely manner to eligible clients; are appropriate to the needs of the clients; and contribute to their community integration, early employment and self-sufficiency. Intensive case management services include a strengths based assessment and personal wellness plan directed toward the achievement of self-sufficiency goals, referral to services for support and barrier removal, and monitoring of progress toward goal achievement. Intensive case management shall commence immediately upon enrollment and continue through the clients' first year after arrival to the U.S. Services should be strengths-based and person-centered, building on clients' strengths, resiliency and aspirations and supporting the clients' motivation and capacities to become self-supporting.

Target Population: Refugees with special needs may include the following: single mothers; elderly refugees without a support system; refugees experiencing social or psychological challenges, including domestic violence, emotional trauma resulting from war or gender or sexual based violence; lesbian, gay, bisexual, and transgender (LGBT) refugees; refugees who are HIV positive; refugees who have a history of suicide risk factors; refugees with physical disabilities or medical conditions; and refugees facing other complex issues (housing, employment authorization documents (EAD), Social Security) who are identified and determined as needing intensive case management services.

Intensive case management services are intended to enhance and not supplant case management services that are supported by existing programs such as the State Department's Reception and Placement program or other ORR funded programs such as the Preferred Communities Program.

¹² To be determined by the applicable state agency prior to enrollment into WF-RMA

¹³ A privately administered WF program with State oversight of RMA only can request to administer medical screening through the WF-CMA discretionary program if it is infeasible for the State agency to administer medical screening.

Case-file Documentation Requirements: A critical aspect of case management services is documenting and tracking services and referrals by maintaining a client case file. A case file shall be maintained for all clients regardless whether they receive WF-CMA intensive case management or WF-RSS case management that includes the following:

1. Intake information (date of eligibility, date of enrollment, date of WF service termination, number and names of members of the case upon arrival; and documentation showing the individual is eligible for services (45 C.F.R. §400.43 and ORR State Letters #00-17, #00-22, #01-13 and #02-01), alien number, birth date, current address, health status, educational level, native language, literacy and English language level, prior work experience and skills, and social security number when obtained).
2. A signed and dated WF enrollment form and a letter of Client Rights and Responsibilities. Documents must be translated into the languages of each refugee caseload.¹⁴
3. A resettlement plan, also known as the Family Self-Sufficiency Plan (FSSP) detailing steps and projected time frames to be taken by the client, the agency, and, as applicable, the family member(s) to work toward the earliest possible employment and self-sufficiency for the family, including strategies to remove any barriers to self-sufficiency and a budget detailing the expected costs and the amount of earnings necessary to be self-sufficient. This plan must be translated in the refugee's own language. If the refugee needs intensive case management, his/her strengths assessment and personal wellness plan must also be included in the case file.
4. Clear documentation of all services provided to clients based upon the needs and goals identified in the FSSP.
5. If a client is enrolled in a training program, the date, type, intended duration, expected outcomes, and provider of the training program must also be indicated in the case file.
6. Documentation of regular contact with, and monitoring progress of members of the case over time with summary notes regarding the purpose and outcomes of that contact. Notes and general documentation should cover all required service areas as prescribed in each Resettlement Plan. All services received as a result of the FSSP are to be documented in the file, regardless of whether the person providing the services is funded through WF funds.
7. A statement(s) regarding the status of the case at 240 days after date of initial eligibility, e.g. whether the employable refugees are employed, number of hours per week, at what wage(s), place(s) of employment, employer contact information, whether or not health benefits are available within 180 days of placement, self-sufficiency status, referral to TANF, etc. These status statements must be located in a designated place in all case files, easily found, and not randomly stated within the case notes.
8. An action plan must be completed for each RCA client who is not employed at the end of the eight month time eligibility period. The plan should include the specific steps the WF agency will take to help these clients to become self-sufficient.
9. Documentation providing childcare and after school care, if needed.
10. RCA payments are to be clearly documented including monthly redetermination calculations and acknowledgement of receipt initialed by an adult member of the client family. Each file must have a **summary sheet of all cash assistance expenditures** allocable to the WF program.

¹⁴ Verbal translation may also be allowable as an alternative to written translation – see Translation and Interpretation Services

11. Proposed budget for the respective case with actual expenditures to date. Budget for each family unit, translated if necessary, showing a list of proposed expenses and income necessary to cover such expenses. The budget must show income from WF cash payments during the WF service period as well as income from employment as applicable. This budget should be a realistic reflection of the household's financial situation during and after the WF service period and should demonstrate self-sufficiency defined as an income level sufficient to preclude eligibility for public assistance.
12. Documentation of the termination of the case, status at termination and referrals to subsequent programs if needed. Upon completion of WF RCA and/or RMA or at the end of eight months, the client must be provided a termination letter indicating the self-sufficiency status of the client; a statement of eligibility for additional refugee services for up to five years, referrals to services as appropriate; a reminder to adjust their immigration status to lawful permanent resident (LPR) after one year from date of grant of the immigration status that made the individual eligible for the WF program, if they did not have LPR status when admitted to the United States; and a reminder to complete and submit to the United States Customs and Immigration Services (USCIS) a Form AR-11 Change of Address form if they move, and file a change of address form with the United States Postal Service (USPS). This letter must be translated in the refugee's own language.
13. WF file documentation must be separate from that of services provided to clients through other programs and the Reception and Placement (R&P) Cooperative Agreement. Separation by sectioning WF from other services in combined files is acceptable. In cases where a refugee case is split among programs, each separate WF case must have a separate section in the file. (see definition for splitting cases).

D. Employment/Employability Services

Funding Source: Formula Social Services (targeted assistance funds can also be used as applicable).

Objective: To place employable clients as quickly as possible into appropriate jobs enabling the household unit to become self-sufficient prior to the end of the eight (8) month RCA time eligibility period. Employable clients are defined as a person who is between the ages of 18 and 64 who is not exempt from registering for employment services. WF agencies must develop written policies, to be approved by ORR, for determining exemption criteria for employment. Employment services are to be provided to employable adult clients beginning upon enrollment in the WF program and continuing until the client becomes self-sufficient. The level of employment services received by each client should reflect the skills, needs, and barriers identified in the FSSP. Agencies providing WF employment services must provide these services in a consistent and equitable manner as needed to all clients.

ORR requires that, if necessary, clients accept "entry level" employment (see 45 C.F.R. §400.81(a) for criteria for appropriate employment). WF programs shall communicate to employable clients who lack English language competency that they must exert a good faith effort to obtain employment while acquiring the competency in English to facilitate self-sufficiency and retain employment. WF programs shall continue to look for suitable work with clients through job upgrades where appropriate.

WF programs shall attempt to find employment for all employable members of the family unit when requested and/or as necessary for the family to become economically self-sufficient.

In those relatively rare cases where newly arrived refugees who, because of their past employment, particular skills, or entrepreneurial experience, may be good candidates for self-employment, WF programs should assist the client to obtain any applicable business or operator licenses as required, and retain copies in the file. WF programs should determine self-sufficiency of the self-employed client based on the net income of the client, which is gross income less expenses and applicable local, state and federal taxes, as compared to the basic budgeted living expenses for the case.

Allowable Services:

1. Job development: An ongoing process of networking with employers to develop prospective job openings for WF clients.
2. Job counseling: Ongoing interaction between the client and the employment staff regarding questions and concerns that clients have about the world of work, job search, the need for early employment, job retention, and the consequences of refusing an appropriate offer of employment.
3. Direct job placement assistance: Assisting the client to identify and contact prospective places of employment, scheduling appointments for job interviews, employability assessment and skills testing, preparing clients for interviews, and following up on results of interviews. Each locale must have a staff person who is responsible for providing or overseeing provision of these services to assist clients to become employed. This person may receive assistance from sponsors and volunteers in locating employment, but the WF program is ultimately responsible for full provision of said service.
4. Follow-up with employer and employed clients: Contacting the employer (if the agency or the agency's volunteer has found the job placement) and contacting the employed clients (regardless of whether the agency or the client found the job placement) within two weeks after the client has started work to identify any adjustment problems and to assist in the resolution of those problems. Such follow-up activities must occur at a minimum for 90 days upon placement.
5. On the job training: When provided at the employment site and expected to lead to full-time unsubsidized employment with the employer that is providing the training.
6. English language instruction: Related to obtaining or maintaining employment.
7. Services that lead to job upgrades: For clients with particular skills, vocations, or when necessary in order for the client family to achieve economic self-sufficiency.
8. Vocational training: When provided as part of an employability plan;
9. Skills re-certification: When an individual is employed but needs training to qualify to practice his/her profession in the U.S. Must be short term (up to one year) (criteria must be in accordance with 45 C.F.R. § 400.81 (b)).
10. Day-care for children: When needed for the acceptance and/or retention of employment.
11. Transportation: When necessary for the participation in an employability service and acceptance and retention of employment.
12. Translation and interpreter services: When in connection to employment or participation in an employability service.
13. Case management services: Limited to refugees that are employable.

14. Assistance in obtaining EADs: Can assist the refugee to apply for an EAD or apply for a fee waiver (ORR funds cannot be used to pay for the EAD).

Applicable ORR Regulations:

1. Subpart F - Requirements for Employability Services and Employment (45 C.F.R. §§400.70-83)
2. Employability Services (45 C.F.R. §400.154)

E. English Language Training (ELT)

Funding Source: Formula Social Services (targeted assistance funds can also be used as applicable).

Objective: To provide ELT to refugees as part of an overall employability plan as prescribed by the case manager. (45 C.F.R. §400.154)

1. Provide or assist clients in enrolling in an ELT class, as needed, according to competency level and previous ELT identified in the resettlement plan. ELT must be concurrent with rather than sequential to employment services. ELT must be provided without cost to the client.
2. ELT classes shall be scheduled so as not to inhibit employment search and employment, e.g., evening classes are recommended where possible. Classes should be geared toward early employment and self-sufficiency. (45 C.F.R. §400.156)
3. WF programs are required to document (in the case file) attendance and progress of the client when ELT is indicated as an essential part of the resettlement plan for employment.
4. WF programs shall inform clients that non-participation without good cause in ELT, where ELT is indicated as essential in a resettlement plan for employment, may be considered grounds for sanctioning or terminating cash assistance.
5. WF programs shall take reasonable measures to ensure that tutoring support services provided by volunteers are coordinated with the ELT curriculum and are provided in response to the needs indicated in the resettlement plan. Volunteers should be provided program orientation and ongoing guidance to assist in effective service delivery.

F. Translation and Interpretation Services

Funding Source(s): WF CMA Discretionary (related to the provision of RCA/RMA -if applicable) and Formula Social Services (related to the provision of social services) (45 C.F.R. §§400.154 and 400.155).

Objective: ORR funded programs are required to provide culturally and linguistically appropriate services to clients as required by Title VI (Prohibition Against National Origin Discrimination) and as required by 45 C.F.R. §§400.55 and 400.156.

To ensure compliance in this area, WF programs shall periodically review client needs and adjust staffing and translation of documents accordingly. WF programs shall also maintain a list of individuals in the community who are available to supplement languages spoken by program staff.

Per 45 C.F.R. §400.55, all written policies and forms must be available in a refugee's language as they relate to eligibility, duration and amount of cash assistance payments, and participation requirements, including penalties for non-cooperation and client rights and responsibilities. For refugee languages comprising a small proportion of the caseload, alternative methods such as verbal interpretation must be documented, signed by the client and case manager/interpreter to ensure that policies are effectively communicated to each refugee. Verbal translation may also be allowable as an alternative to written translation of key WF documents (listed below) when the client is illiterate in his/her own language. A notation must be listed on these documents indicating that the documents were interpreted for the client and the client understood the contents of these documents

Except as noted above, all WF programs must also translate the following types of documents into primary client languages:

1. Documents that need client signature
2. Documents that explain program services
3. Documents that explain client rights and responsibilities
4. Documents that explain key elements of the WF program
5. Documents that provide notice in change of benefits or opportunity for hearings (45 C.F.R. §§400.23 and 400.54)

G. Refugee Social Services - Key Requirements

Applicable ORR Regulations:

1. Opportunity to apply: 45 C.F.R. §400.145
2. Use of funds: 45 C.F.R. §400.146
3. Priority in provision of services: 45 C.F.R. §400.147
4. General eligibility requirements: 45 C.F.R. 400.150
5. Limitations on eligibility of services: 45 C.F.R. §400.152
6. List of allowable employability services: 45 C.F.R. §400.154 (see description in previous section)
7. List of other allowable refugee services: 45 C.F.R. §400.155
8. Service requirements: 45 C.F.R. §400.156

V. PROGRAM ADMINISTRATION

Funding Source: WF-CMA

Objective: To ensure planned, coordinated, timely, and appropriate delivery of services and adherence to federal regulations, policies, and guidelines (see State Letters # 12-13 and #13-03 that provides updated guidance on estimating and reporting CMA administrative costs).

A. Statewide Coordination

The WF program is either a state or a state replacement (private non-profit entity) and is therefore responsible for the coordination of all refugee resettlement services in the

state/geographic area covered by WF. The Director of the WF program is usually the State Refugee Coordinator (SRC)¹⁵. In cases where the WF program is administered by a private non-profit agency but where the state is a participant in the refugee program (e.g. oversight of RMA only), the state is responsible for overall coordination of RMA and Medical Screening statewide and should fulfill this function in close coordination with the Statewide WF Director. The state should appoint a State Refugee Coordinator unless the state specifically requests to relinquish its role of State Refugee Coordinator. In this case, the role of Refugee Coordinator for the statewide program (WF SRC) will be assigned to the private WF agency which is determined in accordance with 45 C.F.R. §400.301 (see page 2 – last paragraph).

ORR regulations (45 C.F.R. §400.5(h)) specifically requires that the state or its designated replacement shall convene no less than quarterly meetings of representatives of all agencies that serve refugees, all local social service agencies and representatives of state and local governments to plan and coordinate placement services prior to resettlement.

WF programs shall require that sub-grantees which participate in the program coordinate, as appropriate, with local TANF offices. This includes prompt response to welfare office questions concerning the level and duration of assistance provided to each refugee.

Also refer to State Letter #12-13 and #13-3 for further clarification of tasks that fall under this category.

1. Statewide Coordination Requirements of the WF-SRC/Lead WF agency:

- a. Plan and coordinate program services with state and local community service providers (public and private) by holding quarterly meetings and by regular communication.
- b. Provide technical assistance and training to sub-agreement agencies (if applicable) to ensure understanding and compliance.
- c. Monitor the performance of the cooperative agreement and sub-agreement activities and review each program function to assure that adequate progress is being made toward achieving programmatic goals and compliance with federal regulations.
- d. Prepare monitoring reports that include any corrective actions recommended. Follow-up on those recommendations shall be filed at the WF program office. Monitoring reports must be included in the ORR-6 submission and other documentation related to monitoring activities must be made available to ORR upon request.
- e. Manage program finances and account for federal funds according to federal requirements.
- f. Submit timely and accurate programmatic and financial reports as detailed in the WF program guidelines from ORR.
- g. Obtain prior approval from ORR before making any significant changes in the design of the program or if the numbers of enrollment are higher than originally planned.
- h. Maintain procedures for sanctioning clients that fail to comply with an agreed-upon WF self-sufficiency plan, and/or directive involving attendance at counseling, training

¹⁵ There are 11 WF sites that fall under the oversight of the SRC including 9 privately administered WF sites where the state has withdrawn from all or part of the ORR funded refugee assistance program. In these states the de-facto role of the “State Refugee Coordinator” is fulfilled by a non-state employee who is employed by the lead WF agency.

sessions, or English classes, or who refuse to be interviewed for or accept an appropriate job offer. (see below on sanctioning).

- i. Ensure that written policies on the provision of RCA including policies regarding eligibility standards, duration and amounts of cash assistance payments, requirements for participation in services, penalties for non-cooperation, client rights and responsibilities, and the process of sanctioning are available in the language of the primary caseloads and can be verbally translated for other caseloads. (45 C.F.R. §400.55)

2. Requirements of the WF Statewide Refugee Coordinator (WF SRC): ¹⁶

- a. The WF SRC has a fiduciary duty to serve the best interests of all of the state's refugees. Decisions pertaining to the administration of the statewide refugee program should be transparent and should be implemented in a fair and equitable manner amongst all of the state's agencies that participate in the WF program.
- b. The WF SRC must develop a written code of conduct to ensure that administrative decisions including the monitoring of a WF provider that is part of the same 501 (c) (3) organizational structure as the WF SRC office does not result in a conflict of interest that unduly benefits the lead agency (45 C.F.R. §75.327). The WF SRC should consider the inclusion of representative(s) from the other WF providers in the state when monitoring a WF provider housed in the same organization as the WF SRC.
- c. The WF SRC (or lead WF agency) must develop a policy for resolving disputes that may arise between the lead WF agency and sub-agreement agencies, as well as between the WF agencies and their refugee clients to ensure that concerns are addressed in a transparent and equitable manner.
- d. The WF SRC must coordinate with all agencies providing assistance and services to refugees in the state.
- e. The WF SRC must meet with and educate community partners and the public at large to advocate for refugees.¹⁷
- f. The WF SRC must attend ORR meetings when required.

B. RCA and RMA Administration:

The lead WF agency is responsible for the oversight of the distribution of RCA and (if applicable) RMA/Medical Screening benefits to eligible clients.

Administrative tasks related to providing RCA to refugees may include the following: intake and assessment of RCA eligibility; benefits authorization and processing of the RCA application; associated interpretation and translation of all required documentation; preparation and distribution of cash benefits; quality assurance, data entry and reporting tasks related to the provision of RCA; and noncompliance documentation, conciliation and sanctioning of RCA clients.

¹⁶ This section (paragraphs a., b., d., e. and f) only applies to WF programs that fall under the oversight of the SRC (currently 11 of the 13 WF sites).

¹⁷ WF SRC must comply with Federal standards applicable to lobbying (see section 503(b) of Pub. L. 113-235).

Administrative tasks related to providing RMA (if part of the WF program) may include the following: intake and assessment of RMA eligibility; benefits authorization and distribution of RMA benefits; associated interpretation and translation of all required documentation; quality assurance, data entry and reporting tasks related to the provision of RMA; and administering and monitoring contracts or other mechanisms used for reimbursement of medical screening services.

Also refer to State Letters #12-13 and #13-3 for further clarification of tasks that fall under this category.

VI. PROCEDURES AND DEFINITIONS

A. Procurement of Services

1. The lead WF agency must sub-award its WF-CMA funds with the other resettlement agencies in the WF state/geographic area to ensure that new arrivals receive seamless assistance and services from their resettlement agency upon arrival to the U.S.
2. If, after providing technical assistance and implementing a corrective action plan, the lead WF agency determines that it would not be in the best interests of the refugees for a particular sub-recipient resettlement agency to continue to serve its clients, the lead agency can select a replacement for the resettlement agency by engaging in a transparent Request for Proposal (RFP) process. The lead WF agency must develop written procurement procedures for selecting sub-recipients to serve eligible refugees.¹⁸
3. Sub-agreements must be based on a transparent methodology that factors in projected number of clients to be served. The methodology must be clearly communicated to the sub-recipients.

B. Sanctioning and Fair Hearing Process

WF programs may sanction a client who fails to comply with an agreed-upon resettlement plan and/or agency directive involving attendance at meetings with case managers, training sessions, or English classes, or who refuses to be interviewed for or accept an appropriate job offer.

In situations where sanctions will be applied, procedures must be in place to ensure that clients receive adequate advance written notice detailing the reasons for the intended action and presenting an opportunity for an adequate hearing before terminating benefits. All clients must be given due process before sanctioning takes place. ORR regulation 45 C.F.R. §400.54 requires that written notice be provided to the refugee at least 10 days before the date in which RCA will be reduced, terminated or suspended. Benefits may not be terminated prior to a final administration action, but are subject to recovery by the agency if the action is sustained.

Such sanctioning may include terminating cash assistance and all services provided through the WF program. Sanctioning procedures must be presented to clients at the time of enrollment, and must be translated if necessary. Should a sanction be applied, WF cash assistance recipients can be sanctioned for one payment month for the first failure to cooperate and 2 payment months for any

¹⁸ WF programs that are administered by a State agency can follow their respective state procurement procedures. Also general grant rules on procurement can be found at 45 C.F.R. §§ 75.327-335).

subsequent failure.

Note: This is a departure from current ORR regulations (45 C.F.R. §400.82) which requires "3 payment months sanction for the first failure and 6 payment months for any subsequent such failure." The new time period for RCA sanctions is more appropriate and proportionate to an eight month RCA program, compared to the current sanction time frame that was implemented at a time when refugees could receive up to 36 months of cash assistance.

ORR regulation 45 C.F.R. §§400.23 and 400.54 require that a state or local agency responsible for RCA must provide an oral hearing to contest adverse determinations. Hearings must be conducted by an impartial official of the state or local agency not directly involved in the initial determination.

C. Definition of Terms

1. **Interim Financial Support:** Financial assistance that meets the basic needs of eligible refugees in accordance with 45 C.F.R. §400.60. The greater part of this assistance is expected to be provided in the form of cash payments to refugees, but may also include income disregards (income which is not counted in determining payment levels and financial eligibility for cash assistance) and incentive bonuses for early employment and job retention.
2. **Self-Sufficiency:** Economic self-sufficiency means earning a total family income at a level that enables a family unit to support itself without receipt of a cash assistance grant. Cases and individuals receiving Food Stamps, Medicaid, etc. without cash payments are considered self-sufficient.
3. **Employed:** This measure is defined as an individual who was determined and reported to be employable in the resettlement plan and who is *legally* employed in the United States. Only one job placement (full-time or part-time) should be counted per client on the ORR-6 and AOGP performance reports; full-time and part-time placements should be indicated separately. Full-time employment is defined as 35 hours or more per week; part-time employment is defined as fewer than 35 hours per week.
4. **Entered Employment with Health Benefits Available:** This measure indicates the number and percent of refugees that entered full-time job placements where health benefits are offered within the first six months of job placement. This is not a measure of the number of refugees who elect to enroll in health benefits, but rather how many employers offered this option. Health benefits are considered available even if coverage is only available to the refugee and not extended to the employee's family members. Benefits are considered available whether or not the employee must contribute to the premium.
5. **Splitting Cases:** A refugee household that has arrived together through the R&P program and has been designated one case number can be split prior to enrollment into the WF program, provided that the household composition is in accordance with the regulations of each respective state. Splitting prior to enrollment would primarily be done:

- a. if the case has parent/s with dependent children over 18;
- b. particular members of the case are ineligible for WF RCA (e.g. a family member on SSI);
- c. if the members of the case would be living in separate households, or
- d. if members of the household would be served under different programs.

If an office splits a case, case file documentation and outcome data should reflect the separation with an explanation of the rationale for the split. In instances where a refugee case is split for RCA purposes, each separate RCA case must have a separate section in the case file.

D. Procedure for a WF Program to Revert to a State-Administered RCA or PPP Model

Once a WF program has been established in a state that has withdrawn from the refugee program, and absent any statutory or regulatory requirement for a WF program to revert to a state-administered RCA or PPP model upon request by the state, it is ORR’s policy that the following requirements be met for ORR to support the state’s request:

1. The state and the current WF agency (and collaborative partners if applicable) come to an agreement that facilitates the transition from a WF to a state-administered or PPP model (or)
2. The state provides justification that the change is in the best interest of the refugee clients, with a plan ensuring that services to refugees will continue uninterrupted and be coordinated with all of the resettlement agencies; (and)
3. The state provides justification that the change is cost effective, and ORR concludes it is in the best interest of the federal government to effectuate a change.

VII. REPORTING

WF programs are required to submit performance progress and financial reports periodically throughout the program year and in accordance with their approved cooperative agreement.

WF program activity and progress achieved toward meeting performance outcome goals are to be reported tri-annually on the ORR-6, the Trimester Performance Report and submitted to GrantSolutions. Trimester reports must include SF-PPR cover page which can be found at: https://www.acf.hhs.gov/sites/default/files/assets/acf_ogm_ppr_updated.pdf.

WF programs must use the ORR-2 for required financial reporting and submit to GrantSolutions.

Program Progress Reports (ORR-6):	Tri-Annually
Financial Reports (ORR-2):	Quarterly

Performance progress and financial reports are due 30 days after the end of the reporting period. Final program performance and financial reports are due 90 days after the close of the project period. Final reports must be submitted electronically to GrantSolutions. Performance and expenditure report forms can be found on the ORR website at: <http://www.acf.hhs.gov/programs/orr/resource/report-forms>

VIII. Application

A. Substantial Involvement Under the Cooperative Agreement

Under the cooperative agreement, the grantee will be expected to submit for Federal review and approval the following:

- (1) description of services and assistance and how they are coordinated and delivered
- (2) proposed amendments to the model as applicable
- (3) proposed number of RCA and RMA (if applicable) recipients and any changes to the number when they are expected to be higher than originally planned
- (4) policy manual and proposed amendments to manual
- (5) staffing component and prompt notification to ORR of any changes regarding key staff
- (6) tri-annual program performance and quarterly expenditure reports
- (7) schedule for monitoring sub-grantees (if applicable) with respect to location, dates and topics
- (8) reports documenting site visits
- (9) sub-agency allocations including the methodology by which the allocations were derived
- (10) all sub-contractual agreements, budgets and staffing pertaining to sub-recipient agencies
- (11) letters of agreement from the local resettlement agencies that indicate support for the WF project
- (12) assurances as required under 45 C.F.R. §§400.5 (g), (h) and (i)
- (13) client demographics which follows a suggested template provided by ORR
- (14) annual budget with a narrative justification of the WF-CMA components (RCA, RMA-if applicable, intensive case management and administration associated with the provision of RCA/RMA and statewide coordination and oversight. Client loading charts should be used to support the RCA and RMA totals. If an RCA differential payment for TANF-type clients is proposed, the RCA budget clearly delineates these costs
- (15) if a differential RCA payment to TANF-type refugees is proposed in the application, a signed agreement between the WF agency/SRC office and the state TANF agency that

supports the differential requirements outlined in these WF guidelines.

B. Contents of the WF Application

ORR is specifically interested in a detailed plan outlining how services and assistance will be provided to the target population and how they will be integrated under the Wilson/Fish program. WF agencies should explain how the services and assistance are provided and not simply list them. The plan should be organized sequentially according (as applicable) to the topics listed on the ORR state plan checklist and other pertinent information germane to the WF program as outlined below:

I. ADMINISTRATION

A. Authority and Organization

- Brief program history
- Identification of the WF Coordinator/State Refugee Coordinator (if applicable)
- Organization structure; program staffing/functions; program and fiscal oversight for the overall project and individual components including oversight of sub-grantees which should include: name, location, number of clients to be served by type of service
- Describe of the precise location of the project and boundaries of the area to be served by the proposed project. Maps or other graphic aids may be attached.

B. Assurances

- Per 45 C.F.R. §§400.5 (g), (h) and (i)

II. ASSISTANCE AND SERVICES

A. Coordination with other Volags, State Agencies and Mutual Assistance Associations:

- Description of how all activities of the project will be coordinated among resettlement agencies, state and county agencies, and service providers in the community, and how refugees will have access to other programs in the community, such as the Children's Health Insurance Program (CHIP), child care services and other support programs for working families and individuals.

B. Coordination of Employment and ELT for RCA Clients:

- Description of how the site will ensure that language training and employment services are made available to refugees, specifically those who are receiving cash assistance.

C. Refugee Cash Assistance:

- RCA policies and procedures that include the following:
 - a. financial eligibility standard for initial and on-going eligibility and treatment of resources in accordance with 45 C.F.R. §400.58;

- b. categorical eligibility for WF-RCA (singles, married couples, families);
- c. payment levels for case sizes 1-5 for RCA and comparison to the respective TANF rates;
- d. a detailed description of how benefit payments will be structured, including RCA differential payments to TANF-type refugees, employment incentives and/or income disregards to be used, if any and methods of payment to be used such as direct cash or vendor payments;
- e. if a differential RCA payment to TANF-type refugees is proposed in the application, a signed agreement between the WF Agency/SRC office and the State TANF agency that supports the differential requirements outlined in this WF guidelines;
- f. a description of how refugees residing within the project area will have appropriate access to cash assistance and services; sanctioning policy and procedures to ensure due process, such as the correction of underpayments and overpayments, notice of adverse action and the right to mediation (in the case of a failure to accept employability services), a predetermination hearing, and an appeal to an independent entity;
- g. a description of when RCA will begin - on date of application or other timeframe;
- h. procedures for providing RCA to secondary migrants, correction of overpayments and underpayments;
- i. exemption criteria for employment and participation in employability service programs, and acceptance of appropriate offers of employment;
- j. a description of the procedures to be used to safeguard the disclosure of information on refugee clients; and
- k. policies and procedures regarding compliance with Title VI of the Civil Rights Act and as required by 45 CFR §§400.55 and 400.156 of the ORR regulations.

D. Refugee Medical Assistance and Medical Screening (if part of WF Program)

- a. RMA/Medical Screening policies and procedures and services provided if funded under WF;
- b. If provided outside of the WF program, outline the process for referral and coordination with the administering state agency.

E. Refugee Social Services

a. Employability Services:

(Employment and other social services provided under the WF program including skills training, orientation, recertification, translation and interpretation, child care, transportation, and citizenship and naturalization services)

b. Intensive Case Management for New Arrivals with Special Needs:

(Description of services, target population and number of projected recipients)

c. Other Case Management Services for Refugees:

(Description of other case management services for refugees identified and determined as not needing intensive case management; target population; number of recipients)

d. ELT:

(Brief description of how English Language Training (ELT) is provided, target population, and funding source)

e. TAG:

(If the WF agency receives TAG formula funds, describe how WF social services and TAG formula services complement each other)

III. Program Performance:

A. Narrative discussion of performance:

- Describe the accomplishments relative to the goals, and the factors which contributed or limited success.
- Establish a self-sufficiency goal that projects when clients will achieve self-sufficiency based on earning a total family income at a level that enables a family unit to support itself without receipt of a cash assistance grant.
- Describe the other benefits refugees will realize as a result of the WF project, including enhanced acculturation and other social adjustment measures.
- Describe how and what data will be collected and how this data will be used to analyze project results.
- Describe the plan and schedule for project monitoring.

B. Government Performance and Results Act (GPRA) Performance Outcomes:

	FY 2015 Goal	FY 2015 TPR 1-2
Entered Employment %:		
Employment Retentions %:		
Entered Employment With Health Benefits %:		
Cash Assistance Terminations %:		
Cash Assistance Reductions %:		
Average Hourly Wage \$:		

C. WF Self-Sufficiency Outcome (FY 15 – TPR 1 & 2):

WF Cash Assistance (WF-CA) recipients who are self-sufficient prior to the end of the 8 month time eligibility period due to earnings from employment:

Number of RCA recipients completing 8 months in FY 15 (TPR 1 & 2) who are not exempt from employment based on 400.76:	
Total number from above who are self-sufficient prior to 240 days due to earnings from employment:	
Percent of RCA recipients who are self – sufficient:	%

IV. Budget and Budget Justification

Provide a budget with line-item detail and detailed calculations for each budget object class identified on the Budget Information Form (SF-424A). Detailed calculations must include estimation methods, quantities, unit costs, and other similar quantitative detail sufficient for the calculation to be duplicated. Specifically the WF-CMA budget must include:

- a. assumptions about the length of time clients are expected to need that assistance;
- b. identification of RCA, RMA (if applicable), intensive case management costs and administrative costs/staffing pertaining to the provision of RCA and RMA (if applicable) and the overall role of coordinating the refugee program in the state/local geographic area. If an RCA differential payment for TANF-type clients is proposed, the RCA budget clearly delineates these costs;
- c. client loading chart showing the anticipated arrival of clients over the budget period and the projected RCA and RMA (if applicable) needed on a monthly basis throughout the year to assist those refugees;
- d. recipient information that includes the number of carryover clients from the prior year as well as those enrolled in the current fiscal year.

V. Appendix

A. Chart of WF Providers, Funding, Clients and Resettlement Agencies

a. WF Service Providers

(Lead agency and all providers unduplicated)

Name/Location	WF-CMA \$ 1/	WF-RSS \$1/	Unduplicated WF Clients # 1/

1/ Include actual figures from June 2014 through May 2015

b. Volags/Resettlement Sites:

Local Resettlement Agency	National Volag	Location	MG Agency (Yes or No)

c. Demographic Information:

- Provide both projected and prior fiscal year number of arrivals by legal status (refugee, asylee, SIV, trafficking victim, Cuban/Haitian entrant and secondary migrant), ethnicity, family composition and assistance type for other programs (TANF, SSI, MG).

B. Resumes

- Provide a biographical sketch or resume for each key person appointed. Resumes should be no more than two pages in length. Job descriptions for each vacant key position should be included as well. As new key staff are appointed, biographical sketches or resumes will also be required.

C. Third-Party Agreements

- Provide written and signed agreements between grantees and sub-grantees, or subcontractors, or other cooperating entities. These agreements must detail the scope of work to be performed and other terms and conditions that structure or define the relationship.