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# **BUREAU OF REFUGEE PROGRAMS POLICY MANUAL**

**DIVISION OF FAMILY AND ECONOMIC SECURITY  
BUREAU OF REFUGEE PROGRAMS**



Wisconsin Department of  
Children and Families

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## 1.0 INTRODUCTION

WELCOME to the Bureau of Refugee Programs (BRP) Manual!

This manual contains policies and procedures used by staff at agencies that have entered into contracts with BRP to administer a program or programs funded through BRP. These agencies will be referred to in this Manual as Sub-recipients.

The content within this manual is the sole responsibility of the State of Wisconsin's Department of Children and Families (DCF). The manual will link to sites outside of DCF where appropriate. DCF is in no way responsible for the content of sites outside of DCF.

Sub-recipients must comply with all applicable [BRP Operations Memos](#), [DCF Administrator's Memos](#), [ORR Policy Letters](#), and federal regulations described in [45 CFR § 400](#) in the implementation of any of programs described in this manual. The Sub-recipient must perform all duties as described in the application submitted for the awarding of their contract. This manual is intended to assist the Sub-recipient by providing guidance related to program administration.

The term "refugee" as used in this Manual includes individuals owning any of the eligible immigrant statuses listed in Section 1.2 of this document.

To sign up for email notifications about updates to this manual, sign up to receive BRP Policy Manual Cover Sheet notifications, which is how minor updates to the manual will be communicated. Note that significant updates will often be communicated using Operations Memos. Sub-recipients must sign up to receive both Policy Manual Cover Sheet notifications and Operations Memo notifications on the [Policy](#) page of the BRP Website.

### 1.1 FUNDING TYPE AND PURPOSE

This section describes all BRP programs except for Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA), which are described separately in this manual.

- **Refugee Support Services - Employment & Employability (RSS-E&E):** The RSS-E&E program funds activities and services that support refugees to comply with the requirements of public benefits programs, end refugees' need for public benefits, and to achieve economic self-sufficiency through family-sustaining employment. Funds may be used to provide employment or employability services that support the entry, maintenance, or advancement of employment for program participants.
- **Refugee Support Services – English as a Second Language (RSS-ESL):** The RSS-ESL program funds activities and services that support refugees to increase their English Language proficiency in speaking, reading, and writing.
- **Refugee Support Services – Other Services (RSS-OS):** The RSS-OS program funds activities and services that address refugees' barriers to self-sufficiency, improved well-being, and community integration through services that support social-adjustment, health and wellness, access to public programs and resources, and citizenship.
- **Afghan Refugee Support Services (ARSS):** ARSS funding is designated to support the resettlement of certain citizens or nationals of Afghanistan and their families, particularly those resources that support housing needs, including both emergency/short-term and long-term housing. Legal assistance, food assistance, employability services, and other services, as per the usual terms of RSS programming, are also allowable uses of this funding. ARSS may also be referred to as Refugee Support Services – Afghan Supplemental Appropriation (RSS-ASA).

- **Ukrainian Refugee Support Services (URSS):** URSS funding is designated to support the resettlement of certain citizens or nationals of Ukrainians and their families, particularly those resources that support housing needs, including both emergency/short-term and long-term housing. Legal assistance, food assistance, employability services, and other services, as per the usual terms of RSS programming, are also allowable uses of this funding.
- **Services to Older Refugees (SOR):** ORR awards SOR funds to BRP as a set-aside of RSS to fund services to refugees aged 60 and above. Funds from the SOR grant may be used to provide activities related to self-sufficiency including socialization, case management, transportation, citizenship-assistance services, and other services as specified in Section 2.
- **Refugee Medical Screening (RMS):** This funding is granted by ORR to BRP based on its annual submission of the ORR-1 Budget Estimate. BRP contracts with local Resettlement Agencies (RAs) and local clinics to ensure coordination and to defray some costs of transportation to medical screening appointments, and interpretation and translation services. BRP funds these services to ensure that 100% of refugees receive health screenings and follow-up care within 90 calendar days of arrival in the U.S. (or within 90 calendar days of acquiring another eligible immigrant status, as described in Section 2).
- **Refugee Health Promotion (RHP):** The RHP grant funds services to promote the health and well-being of refugees and other ORR-eligible populations through providing opportunities to increase health literacy, supporting the health and wellness of individuals and families, coordinating health care, and organizing wellness groups. BRP contracts with local refugee-serving agencies to hire and train bilingual staff, increase health literacy, improve access to health care and health insurance, train health care providers to enhance coordination of care, and provide case management assistance to refugees with complex medical needs.
- **Afghan Refugee Health Promotion (ARHP):** ARHP funding provides additional supplemental RHP services to certain citizens or nationals of Afghanistan, and their families. The ARHP grant is identical to RHP, except that participant eligibility is limited to include only Afghans as described in Section 2.
- **Ukrainian Refugee Health Promotion (URHP):** URHP funding provides additional supplemental RHP services to certain citizens or nationals of Ukraine. The URHP grant is identical to RHP, except that participant eligibility is limited to include only Ukrainians as described in Section 1.2.3.2.
- **Refugee Mental Health Initiative – Capacity Building (ReMHI-CB):** The ReMHI-CB program funds activities and services that build the capacity of mental health service providers in order to increase the availability and improve the quality of mental health services for refugees. The goal of the ReMHI-CB program is to increase the capacity of statewide mental health services to serve refugee populations appropriately and effectively. ReMHI-CB projects should increase the capacity of mental health service providers to respond to the complex mental health needs of refugees.
- **Refugee School Impact (RSI):** The RSI program funds activities and services that lead to the effective integration and education of eligible refugee youth. The central goal of the RSI grant is to assist newly arrived refugee children to improve their academic performance and social adjustment in schools. The RSI program administers activities related to Early RSI, which is defined as services and activities to ORR eligible families with children aged birth until the age they enter school, usually age five or six, although individual circumstances may apply. The goal of Early RSI is to increase the access to childcare, to help eligible children prepare for and succeed in formal schooling and holistically serve eligible families.

- **Afghan Refugee School Impact (ARSI):** ARSI funding provides additional supplemental RSI services to certain citizens or nationals of Afghanistan, and their families. The ARSI grant is identical to RSI, except that participant eligibility is limited to include only Afghans as described in Section 2.
- **Ukrainian Refugee School Impact (URSI):** URSI funding provides additional supplemental RSI services to certain citizens or nationals of Ukraine. The URSI grant is identical to RSI, except that participant eligibility is limited to include only Ukrainians as described in Section 2.
- **Refugee Youth Mentoring (RYM):** The RYM program funds services that promote integration, foster positive civic and social engagement, and to support individual educational and vocational advancement. To accomplish these goals, program activities are intended to connect refugee youth ages 15 to 24 to supportive members of the community. These mentors support refugee youth as they adjust to their communities, and work with them to identify and work towards educational and/or vocational goals.
- **Afghan Refugee Youth Mentoring (ARYM):** ARYM funding provides additional supplemental RYM services to certain citizens or nationals of Afghanistan, and their families. The ARYM grant is identical to RYM, except that participant eligibility is limited to include only Afghans as described in Section 2.
- **Refugee Career Development Services (RCDS):** The RCDS grant funds activities and services that support refugees to achieve economic self-sufficiency. Funds may be used to provide employment or employability activities and services, as well as other services to refugees. RCDS is designed to support the longer-term career advancement goals, as distinct from RSS-E&E to design a plan of employability which is intended to result in the earliest possible employment.

## 1.2 ELIGIBILITY

This section outlines the eligibility rules for all BRP programs except for RCA and RMA, which are described separately in this manual.

The Sub-recipient is required to ensure that all participants receiving program benefits and services are eligible to receive such benefits and services by collecting and reporting data on the immigrant status of each participant to BRP. The Sub-recipient should use the following guidelines to correctly establish eligibility for potential participants: [ORR Status and Documentation Requirements](#), [ORR Policy Letter 22-02](#), [ORR Policy Letter 22-01](#), and the [U.S. Citizenship and Immigration Services Fact Sheet on Afghan Arrivals](#).

Uniquely, the RCDS program is available to individuals with the below listed immigrant statuses, with refugee background, and household members of anyone falling into either of those two categories. For the purposes of eligibility determination under this Contract, “individuals with refugee background” means a U.S. citizen who has previously held one of the statuses identified below. For all other programs, the individual must hold one of the below statuses themselves in order to be eligible.

### 1.2.1 Immigrant Status

Funds must not be used to provide services to United States citizens, since United States citizens are ineligible under the authorizing legislation. The following eligibility criteria apply to all funded activities and services. Individuals with the following immigrant statuses are eligible for all program benefits and services as established by [45 CFR § 400.43\(a\)](#), [ORR Policy Letter 22-01](#), [ORR Policy Letter 22-02](#), and [ORR Policy Letter 22-13](#):

1. Individuals paroled as refugees or asylees under §212(d)(5) of the Immigration and Nationality Act (INA);
2. Refugees admitted under §207 of the INA;
3. Asylees whose status was granted under §208 of the INA;
4. Cuban and Haitian entrants, in accordance with the requirements in [45 CFR § 401.2](#);
5. Certain Amerasians from Vietnam who are admitted to the U.S. as immigrants pursuant to §584 of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1988 (as contained in §101 (e) of Public Law 100-202 and amended by the 9<sup>th</sup> provision under Migration and Refugee Assistance in Title II of the Foreign Operations, Export Financing, and Related Programs Appropriation Acts, 1989 (Public Law 100-461 as amended));
6. Individuals subjected to a severe form of trafficking who have been certified by the United States Department of Health and Human Services (HHS) under The Trafficking Victims Protection Act of 2000, Pub. L. No. 106-386, Division A, 114 Stat. 1464 (2000);
7. Certain Iraqi and Afghan Special Immigrant Visa holders (SIV) pursuant to the Defense Authorization Act for Fiscal Year 2008, Public Law 110-181;
8. Afghan Special Immigrant Parolees as described in [ORR Policy Letter 22-02](#) and [ORR Policy Letter 22-10](#);
9. Afghan Special Immigrant Conditional Permanent Residents as described in [ORR Policy Letter 22-02](#) and [ORR Policy Letter 22-10](#);
10. Afghan Humanitarian Parolees as described in [ORR Policy Letter 22-02](#) and [ORR Policy Letter 22-10](#);
11. Eligible Ukrainians as described in [ORR Policy Letter 22-13](#), and listed below:
12. Citizens or nationals of Ukraine who the Department of Homeland Security (DHS) has paroled into the United States between February 24, 2022, and September 30, 2023, due to urgent humanitarian reasons or for significant public benefit, known as Ukrainian Humanitarian Parolees (UHPs);
13. Non-Ukrainian individuals who last habitually resided in Ukraine, who DHS has paroled into the United States between February 24, 2022, and September 30, 2023, due to urgent humanitarian reasons or for significant public benefit;
14. A spouse or child of an individual described above in item 12 or 13 who is paroled into the United States after September 30, 2023; and
15. A parent, legal guardian, or primary caregiver of an unaccompanied refugee minor or an unaccompanied child described above in item 12 or 13 who is paroled into the United States after September 30, 2023;
16. Lawful permanent residents who previously held one of the statuses identified above;

### **1.2.2 Time-Limited Eligibility:**

Eligibility for all programs and services is for 60 months (five years) following the date an eligible immigrant status was granted, with the exception of SOR and RCDS, for which there is no time limit. For refugees, SIVs, and certain Amerasians, the date of eligibility is equal to the date of entry in the United States. For individuals of all other immigrant statuses listed above, eligibility begins on the date that the status was granted. Lawful permanent residents who previously held one of the other statuses retain the

same eligibility start date from their original eligible status. For Afghan Special Immigrant Parolees, Afghan Special Immigrant Conditional Permanent Residents, and Afghan Humanitarian Parolees, the date of eligibility is equal to the date of entry into the community, as determined either from travel documentation from a Safe Haven or by a verbal attestation authorized by BRP. Throughout this document, references to “date of arrival” should be assumed to mean, for the three categories of Afghans described here, that individual’s date of entry into the community.

Refugees may remain eligible for certain limited services after their 60 months of eligibility has passed. These services include referral, translation or interpretation, and citizenship preparation or application assistance. The 60-month eligibility period for RSS base and set-aside funds may also be waived by ORR upon request by BRP, in certain extreme circumstances, given the guidelines provided for authorizing such an exception are followed, per [ORR Policy Letter 22-05](#).

### **1.2.3 Other Eligibility Limitations:**

#### **1.2.3.1 Age:**

1. RSS-E&E funded services may be provided in accordance with [45 CFR § 400.152](#) to refugees ages 16 and up, if that refugee is either not enrolled full-time as a student in elementary or secondary school, or if the services are outside school hours and the employment is part-time, temporary, or follows the completion of schooling. RSS “Other Services” as described in [45 CFR § 400.155](#) do not have a minimum age requirement, and may be provided to refugees regardless of age. SOR services may only be provided to refugees ages 60 and up.
2. RSI services are limited to refugees who are ages birth through 20 years. For individuals that are at the age that a child enters school, usually age 5 or 6, through age 20, they must be enrolled full-time in K-12 school or a high school equivalent GED/ABE program to receive RSI services. RSI grant funded projects must conclude services to refugee participants once they reach their 21<sup>st</sup> birthday. As of FFY22, eligibility for the RSI program has been extended to include children ages birth to five, B-5, (0-5) or until the age a child enters Kindergarten, usually age 5 or 6. Services to children ages birth to five should be prioritized for children needing early care and education services or any child in this age range being provided activities and services aimed at preparing children for success in K-12. Services provided to children birth to five under this grant are referred to as Early RSI. Services may be provided to the parents or guardians of eligible refugee students as listed in Sections 1 and 2 below.
3. RYM participant eligibility is limited to refugees who are ages 15-24. RYM grant funded projects must conclude services to refugee participants once they reach their 25<sup>th</sup> birthday. Services should be prioritized to eligible refugee youth who may benefit from mentorship services to be well integrated and successful socially and academically in the American school system.

#### **1.2.3.2 Country of Origin**

ARSS, ARHP, ARSI, and ARYM are limited to citizens or nationals of Afghanistan who hold any of the immigrant statuses as described in Section 1.2.1 numbers 1-10 or 16. URSS, URHP, and URSI are limited to citizens or nationals of Ukraine who hold any of the immigrant statuses as described in Section 1.2.1 numbers 1-6 or 11-16.

## **1.3 PRIORITIZATION OF SERVICES**

This section describes how services to eligible individuals must be prioritized for all BRP programs, except for RCA and RMA, for which this category is not applicable.

Demand for services may be higher than what the Sub-recipient can provide at the level of funding designated. Therefore, participant services must be prioritized according to the following order in each funding category:

### **1.3.1 RSS-E&E/RSS-ESL/RSS-OS/ARSS/URSS**

1. Refugees who are receiving any type of publicly funded cash assistance;
2. Unemployed refugees who are not receiving cash assistance;
3. Employed refugees in need of services to retain employment or to attain economic independence (e.g., job upgrade);
4. Other eligible refugees within their first 12 months after initial resettlement to the U.S.; and
5. All other eligible refugees.

### **1.3.2 SOR**

1. Older refugees who recently exceeded the seven-year mark after arrival in the United States and are in danger of losing benefits because they have not yet become citizens are eligible for citizenship preparation services only;
2. Refugees who are receiving any type of publicly funded cash assistance;
3. Other eligible refugees within their first 12 months after initial resettlement to the U.S.; and
4. All other eligible refugees.

### **1.3.3 RMS**

1. Refugees who have not yet completed the post-arrival initial health screening;
2. Recently arrived refugees who have not yet been connected to a medical clinic for primary care provision;
3. Recently arrived refugees who have not received health orientation; and
4. Other eligible refugees.

### **1.3.4 RHP/ARHP/ URHP/ReMHI-CB**

1. Individuals who have the most persistent, pressing, or underserved health needs.
2. Other eligible refugees within their first 12 months after initial resettlement to the U.S.; and
3. All other eligible refugees.

### **1.3.5 RSI/ARSI/URSI**

1. Newly arrived refugee youth, i.e., those that have been in the United States for one year or less, and have academic and social adjustment needs; and
2. Refugee youth who have been in the United States more than one year, but less than five years; and
3. Children who are not being served through mainstream services for children birth to five or the age that they enter Kindergarten.

### **1.3.6 RYM/ARYM**

1. Newly arrived refugee youth who have been in the United States for one year or less, and have academic and social adjustment needs; and
2. Refugee youth who have been in the United States more than one year, but less than five years.

### **1.3.7 RCDS**

1. All eligible refugees during their first year in the United States;
2. Refugees who are receiving any type of cash assistance;
3. Unemployed refugees who are not receiving cash assistance;
4. Employed refugees in need of services to retain employment or to attain economic independence (e.g., job upgrade);
5. A U.S. citizen who has previously held one of the statuses identified in Section 1.2; and
6. Other eligible refugees.

## **2.0 REQUIRED AND ALLOWABLE ACTIVITIES AND SERVICES**

This section describes the required and allowable activities and services for all BRP programs, except for RCA and RMA, which is described separately in the RCA and RMA sections.

The Sub-recipient must offer services to refugees throughout the entire contracting period even if the target number of refugees listed in the approved Annual Service Plan has been met prior to the end of the contract period.

If the Sub-recipient is unsure whether an activity is required, allowable, or otherwise qualifies as a fundable service, the Sub-recipient must contact their designated Contract Monitor at BRP for clarification.

All required and allowable services described in this manual must be documented in the Wisconsin Refugee Programs Database (WRPD) by the Sub-recipient. Prior to the documentation of all required and allowable services, refugees must be enrolled in the appropriate BRP-administered program in WRPD. If a refugee is already enrolled in BRP-administered programs at the time of program enrollment and their record exists in the WRPD database as a result, the Sub-recipient must maintain responsibility for ensuring the accuracy of existing documentation related to the co-enrolled refugee. If the Sub-recipient discovers inaccurate data for existing, co-enrolled participants, any corrections must first be authorized by BRP.

For all programs described below, a BRP Participation Agreement form must be completed and uploaded into WRPD, and the Confidential Release or Discussion Authorization form must be used only as needed, in order to send or discuss case details with an agency or individual outside of the programs listed below. These and all DCF forms can be found on the DCF Forms Website (<https://dcf.wisconsin.gov/forms>).

In addition to the program specific required and allowable activities listed in this section, the Sub-recipient must assure program coordination by maintaining collaborative partnerships with other refugee services providers. BRP reserves the right to require that the Sub-recipient formalize these partnerships through the development of a contract or Memorandum of Understanding (MOU). The following requirements also apply:

**Network Meetings and Coordination with other BRP Sub-recipients to Avoid Duplication of Services:** The Sub-recipient must participate in local and statewide refugee-network coordination meetings as assigned by BRP. During and outside of such network meetings, the Sub-recipient must partner with other local refugee services providers to coordinate referral processes, plans for delivery of services to co-enrolled participants, and outreach to shared eligible communities. In areas where BRP funds multiple Sub-recipients for the same program(s) in the same geographic area(s), all such Sub-recipients operating the same program(s) must meet no less than monthly to avoid the duplication of BRP funded services. Attendance at network coordination meetings may count toward this monthly requirement if duplication of services is specifically discussed by the Sub-recipients operating the same BRP-funded program(s).

**Other Coordination Requirements:** The Sub-recipient must attend all mandatory trainings and meetings convened by the State Refugee Coordinator or BRP. The Sub-recipient must share any information and/or materials distributed at the trainings or meetings with all Sub-recipient staff working in any BRP-funded program. Failure to meet this contractual obligation may result in termination of the Contract. Required meetings may include but are not limited to:

**RSS-E&E:** The Sub-recipient must ensure joint employment and employability planning with other local providers for co-enrolled participants. The Sub-recipient must cooperate with BRP's efforts to coordinate with the local W-2 provider(s); the local Workforce Development Board; and other providers who are contracted by BRP or DCF for the provision of services to refugees. BRP may require the Sub-recipient to attend additional coordination meetings between local W-2 providers, mutual assistance associations, RAs, schools, public health agencies, ESL providers, and other community-based organizations.

**ARSS:** The Sub-recipient must coordinate with other local Sub-recipients of ARSS to attempt to achieve increased and consistent availability of affordable housing for ARSS-eligible Afghans, while limiting competition between RAs or ARSS Sub-recipients and maintaining positive relationships with landlords.

**URSS:** The Sub-recipient must coordinate with other local Sub-recipients of URSS to attempt to achieve increased and consistent availability of affordable housing for URSS-eligible Ukrainians, while limiting competition between RAs or URSS Sub-recipients and maintaining positive relationships with landlords.

**SOR:** The Sub-recipient must ensure that case management functions are linked to the local AAA and must participate, cooperate, and coordinate with the local AAA. The Sub-recipient must undertake joint planning and delivery of services and referrals with other local agencies administering related services for this target population.

**RMS:** The Sub-recipient must ensure that case-management and referrals are coordinated with the local health department or local primary care provider to achieve timely execution of initial health screening, follow-up, and treatment services.

## 2.1 RSS-E&E

### 2.1.1 Allowable Activities and Services:

The Sub-recipient may provide any of the following services in accordance with [45 CFR § 400.154](#):

1. Employment services including world-of-work and job orientation, job clubs, job workshops, job development (conducting mock interviews, developing resumes, etc.), referral to job opportunities, job search, job placement, follow-up, and job retention services;
2. Employability assessment services, including employment-related aptitude and skills testing;
3. On-the job training, including paid and unpaid internships or similar work experiences, when such training is provided at the employment site and is expected to result in full-time, permanent, unsubsidized employment with the employer who is providing the training;

4. English as a Second Language (ESL) instruction, with an emphasis on English as it relates to obtaining and retaining a job;
5. Vocational Skills training, any skills trainings customized for specific employment opportunities when provided as part of a Family Self-Sufficiency Plan (FSSP) or individual Employability Plan (EP);
6. Skills recertification, when such training meets the criteria for appropriate training in [45 CFR § 400.81\(b\)](#);
7. Child-care for children, when necessary for participation in an employability service or for the acceptance or retention of employment;
8. Transportation (including provision of bus passes, courses that teach refugees to obtain and keep driver's licenses, etc.) when necessary for participation in an employability service or for the acceptance or retention of employment;
9. Translation and interpreter services, when necessary, in connection with employment or participation in an employability service;
10. Case Management (i.e., referral) services, specifically for refugees who are considered employable, if such referred services are directed toward a refugee's attainment of employment as soon as possible after arrival in the United States. Case management services are defined in [45 CFR § 400.2](#) as the determination of which service(s) to refer a refugee to, referral to such service(s), and tracking of the refugee's participation in such service(s); and
11. Assistance in obtaining Employment Authorization Documents.

## 2.1.2 Required Activities and Services

The Sub-recipient must deliver all the following services to all refugees enrolled in RSS-E&E funded programs, unless otherwise exempted by BRP:

1. Develop a Family Self-Sufficiency Plan (FSSP) for all enrolled refugees and their family members who live in the same household; and develop an individual Employability Plan (EP) for all adult individuals; in accordance with [ORR Policy Letter 21-06](#) and [BRP Operations Memo 21-01](#), within 30 days of program enrollment. If a family member is unable to be contacted or declines to be included in the FSSP, then the Sub-recipient must record a case note in WRPD that verifies the Sub-recipient's attempts to reach the family member, the Sub-recipient's attempts to offer services or referral to services, and the Sub-recipient's attempts to include the family member in the FSSP. For refugees who already have a current FSSP recorded in WRPD via an enrollment in RSS-E&E by another agency, the Sub-recipient must coordinate with the agency that created the FSSP to make updates as needed. For refugees co-enrolled in FoodShare Employment and Training Program (FSET), Wisconsin Works (W-2), Refugee Cash Assistance (RCA), or other BRP-funded refugee programs, the Sub-recipient may develop this plan in collaboration with the local agency issuing such programs or benefits;
  - a) An FSSP is defined in [45 CFR § 400.71](#) as:

“A plan that addresses the employment-related service needs of the employable members in a family for the purpose of enabling the family to become self-supporting through the employment of one or more family members.”
  - b) An EP is defined in [45 CFR § 400.71](#) as:

“An individualized written plan for a refugee registered for employment services that sets forth a program of services intended to result in the earliest possible employment of the refugee.”

2. Share FSSPs and individual EPs of participants who are co-enrolled in W-2, RCA, FSET, or other BRP-funded refugee programs with agencies who administer such programs or benefits, if such agencies request access to the FSSP or EP for the purpose of establishing eligibility or providing appropriate services. Any allowable activities and services as listed in Section 2 above are considered a required service or activity to be provided by the Sub-recipient if such an activity is recorded in a refugee’s FSSP or EP as necessary for the fulfillment of that plan;
3. Maintain regular contact with participants, and complete follow-up assessments at six and twelve months from the date of enrollment in RSS E&E. Follow-up assessments must include an assessment of the progress and outcomes towards meeting the previously established short- and long-term goals, identification of any new barriers, new referrals (if applicable), the employment status of anyone 16 years or older, a revised family budget (if appropriate), and a revised EP (if appropriate). If a family cannot be reached at the 6- or 12-month mark, the client’s status must still be determined to most accurate extent possible, using the best available data;
4. Provide or refer refugees for services that help them implement their assigned activities, overcome barriers, and achieve their goals as recorded in their EP and FSSP. Similarly, provide or refer for other services that address health, social, education, or financial issues that arise during employability service provision. The Sub-recipient and other agencies may exchange information about refugee participants, or their relatives included in the FSSP upon receipt of releases of information signed by the participant and/or their relatives, as applicable;
5. Ensure all refugees who receive RCA are provided employment and training services that fulfill their RCA participation requirements in order to remain eligible for RCA benefits;
6. Share information regarding job entry, participation in activities assigned in FSSPs or EPs, or other information related to eligibility of participants who are co-enrolled in W-2, RCA, FSET, or other BRP-funded refugee programs, with agencies who administer these programs or benefits, if such agencies request such information for the purpose of establishing eligibility in said benefits in accordance [with ORR Policy Letter 16-08](#);
7. Confirm whether participants are employed 90 calendar days after they enter a job;
8. Adhere to all BRP-issued policy and federal guidance concerning employment and employability of refugee participants co-enrolled in W-2, FSET, or RCA; and
9. Administer participant satisfaction surveys to a random sample of at least 20% of the adult caseload per year.

## 2.2 RSS-ESL

### 2.2.1 Allowable Activities and Services

The Sub-recipient may provide any of the following services in accordance with [45 CFR § 400.155](#):

1. English language instruction in accordance with [ORR Policy Letter 20-01](#);
2. Transportation, when necessary for participation in an ESL service;
3. Translation and interpreter services, when necessary, participation in an ESL service;
4. Case management services, as defined above in [45 CFR § 400.2](#);

5. Citizenship and naturalization related ESL services, specifically services that prepare refugees to apply for citizenship or adjustment of lawful permanent resident status; obtaining disability waivers from English requirements for naturalization test, and the provision of interpreter services for the citizenship interview.

## **2.2.2 Required Activities and Services**

The Sub-recipient must deliver all the following services to all refugees enrolled in RSS-ESL funded programs, unless otherwise directed or exempted by BRP:

1. Complete an initial assessment of the participants' English language proficiency in speaking, reading, and writing; and develop a plan for addressing participants' identified needs and that assists participants to meet their goals related to English language proficiency;
2. Provide ESL services to participants in accordance with their initial assessments and plans. Refer for other services that address employment, employability, health, social, education, or financial, or other issues that arise during service provision. The Sub-recipient may exchange information about participants with other agencies only after a release of information is signed by the participant;
3. Update the plan developed to address refugees' identified needs as needed, but not less than every six months;
4. Where applicable, provide RSS-ESL services in alignment with participants' FSSP or EP developed through co-enrollment in Refugee Support Services–Employment & Employability (RSS-E&E), Refugee Cash Assistance (RCA), Wisconsin Works (W-2), or FoodShare Employment & training (FSET);
5. Share information regarding participation in ESL activities if such activities were assigned in FSSPs or EPs, and share other information related to the eligibility of participants who are co-enrolled in RSS-E&E, RCA, W-2, FSET with agencies who administer these benefits if such agencies request such information for the purpose of establishing eligibility in said benefits; and
6. Administer participant satisfaction surveys to a random sample of 20% of the adult caseload per year.

## **2.3 RSS-OS**

### **2.3.1 Allowable Activities and Services**

The Sub-recipient may provide any of the following services in accordance with [45 CFR § 400.155](#):

1. English as a Second Language (ESL) instruction, without an emphasis on English as it relates to obtaining and retaining a job, or for non-employable participants in accordance with [ORR Policy Letter 20-01](#).
2. Information and referral services.
3. Outreach services, including activities designed to familiarize refugees with available services, to explain the purpose of these services, and facilitate access to these services.
4. Social adjustment services, including:

- a) Emergency services as follows: Assessment and short-term counseling to persons or families in a perceived crisis; referral to appropriate resources; and the making of arrangements for necessary services;
  - b) Health-related services as follows: Information; referral to appropriate resources; assistance in scheduling appointments and obtaining services; and counseling to individuals and families to help them understand and identify their physical and mental health needs and maintain or improve their physical and mental health; and
  - c) Home management services as follows: Formal or informal instruction to individuals or families in management of household budgets, home maintenance, nutrition, housing standards, tenants' rights, and other consumer education services.
5. Day care for children, when necessary for participation in a service other than an employability service.
  6. Transportation, when necessary for participation in a service other than an employability service.
  7. Translation and interpreter services, when necessary for a purpose other than in connection with employment or participation in an employability service.
  8. Case management services, as defined above in [45 CFR § 400.2](#) and when necessary for a purpose other than in connection with employment or participation in employability services.
  9. Citizenship and naturalization preparation services, including English language training and civics instruction to prepare refugees for citizenship, application assistance for adjustment to legal permanent resident status and citizenship status, assistance to disabled refugees in obtaining disability waivers from English and civics requirements for naturalization, and the provision of interpreter services for the citizenship interview.
  10. GED/ABE classes and/or basic computer classes.
  11. Any additional service, upon submission to and approval by BRP, aimed at strengthening and supporting the ability of a refugee individual, family, or refugee community to achieve and maintain economic self-sufficiency, improved well-being, and community integration, and which has been demonstrated as effective and is not available from any other funding source.

## 2.4 ARSS

### 2.4.1 Allowable Activities and Services

Allowable activities and services for ARSS-funded programs include any RSS allowable service (including RSS-E&E, RSS-ESL, and RSS-OS) as already described, as long as the required activities and services described below have already been addressed and provided as needed. All allowable ARSS activities and services listed below must be provided in accordance with [45 CFR § 400](#), [ORR Policy Letter 22-03](#), and [ORR Policy Letter 22-11](#).

### 2.4.2 Required Activities and Services

The Sub-recipient must provide each of the below listed services as described. All required ARSS activities and services listed below must be provided in accordance with [45 CFR § 400](#), [ORR Policy Letter 22-03](#), and [ORR Policy Letter 22-11](#).

1. Provision of safe, affordable, short-term and long-term housing, or the determination that such services are unnecessary for participants who have already achieved stable and affordable long-term housing;

2. Immigration related legal assistance, including assistance with asylum applications or similar legal services related to adjustment of immigrant status; and
3. Any RSS-E&E, RSS-ESL, or RSS-OS service that assists a participant to overcome a barrier or achieve a goal identified in their FSSP, provided that ARSS funding is not otherwise needed to pay for the services described in IV. D. 2. a)-b).

## 2.5 URSS

### 2.5.1 Allowable Activities and Services

Allowable activities and services for URSS-funded programs include any RSS allowable service (including RSS-E&E, RSS-ESL, and RSS-OS) as already described, as long as the required activities and services described below have already been addressed and provided as needed. All allowable URSS activities and services listed below must be provided in accordance with [45 CFR § 400 and ORR Policy Letter 22-15](#).

### 2.5.2 Required Activities and Services

The Sub-recipient must provide each of the below listed services as described. All required URSS activities and services listed below must be provided in accordance with [45 CFR § 400 and ORR Policy Letter 22-15](#).

1. Provision of safe, affordable, short-term and long-term housing, or the determination that such services are unnecessary for participants who have already achieved stable and affordable long-term housing;
2. Immigration related legal assistance, including assistance with asylum applications or similar legal services related to adjustment of immigrant status; and
3. Any RSS-E&E, RSS-ESL, or RSS-OS service that assists a participant to overcome a barrier or achieve a goal identified in their FSSP, provided that ARSS funding is not otherwise needed to pay for the services described in IV. D. 2. a)-b).

## 2.6 SOR

### 2.6.1 Allowable Activities and Services

The Sub-recipient may provide the following services and in accordance with [Policy Letter 22-08](#) and [Dear Colleague Letter 22-16](#) and for the purposes of improving older refugees' access to available aging services, including but not limited to:

1. Congregate nutrition services and meals delivered to homebound participant residences;
2. Transportation;
3. Interpretation and translation;
4. Home care, adult day care, and respite care;
5. Elder abuse prevention;
6. Nursing home ombudsman services;
7. Citizenship and naturalization for elderly refugees, including referrals to specialized service providers (such as mental health clinicians), interpretation, ESL, ESL for citizenship, civics classes to help older refugees prepare for the citizenship interview and exam, transportation to medical and other appointments, case management, socialization and other activities designed to help them overcome barriers to achieving citizenship. \*

\* = Payment of application fees for citizenship examinations are not allowable using these funds.

## 2.6.2 Required Activities and Services

The Sub-recipient must provide each of the below listed services as described and in accordance with [Policy Letter 22-08](#) and [Dear Colleague Letter 22-16](#):

1. Establish, maintain, and/or expand a working relationship with the State Agency on Aging and the local community Area Agency on Aging (AAA) to ensure that elderly refugees will be linked to mainstream aging services in the community;
2. Provide appropriate services to all elderly refugees who are not currently being provided in the community so that elderly refugees may live independently as long as possible;
3. Provide or refer refugees for citizenship and naturalization services (as described in the Allowable Activities and Services Section above), especially for those who have lost or are at risk of losing eligibility for Supplemental Security Income or other Federal benefits programs; and
4. Administer participant satisfaction surveys to a random sample of 20% of the adult caseload per year.

## 2.7 RMS

### 2.7.1 Allowable Activities and Services

The Sub-recipient may provide any of the following services in accordance with [Dear Colleague Letter 23-08](#) and [State Letter 12-09](#):

1. Interpretation during screening appointments;
2. Transportation to health appointments;
3. Setting up appointments for follow-up care and attaching refugees to a Primary Care Physician.

### 2.7.2 Required Activities and Services

The Sub-recipient must provide each of the below listed services as described and in accordance with [Dear Colleague Letter 23-08](#) and [State Letter 12-09](#):

1. Designate a health liaison who will coordinate all health services related to health screening and follow-up services for refugees;
2. Provide refugees with information on and referral to local health centers/clinics and Medicaid providers;
3. Coordinate health-screening logistics and interpreter services to ensure that health screening is completed for all refugees within 90 calendar days from their date of arrival, and in accordance with the [Revised Medical Screening Guidelines for Newly Arriving Refugees \(ORR State Letter 12-09\)](#). Compliance with [ORR State Letter 12-09](#) is necessary for accurate reporting of health screening completions and for provision of referrals to follow-up medical care that addresses refugees' health issues identified in the screening;
4. Collect the After-Visit Summary and confirmation of completion of the health screening from the health screening provider;
5. Coordinate the scheduling of follow-up services to ensure refugees receive appropriate medical treatment; and

6. Administer participant satisfaction surveys to a random sample of 20% of the adult caseload per year.

## 2.8 RHP/ARHP/URHP

### 2.8.1 Allowable Activities and Services

The Sub-recipient may provide any of the bellow listed allowable activities, and must follow these guidelines when implementing these RHP activities:

1. Health Education Classes and Targeted Health Outreach to Individuals:
  - a) Provide group classes and individual outreach to participants and their families;
  - b) Use user-tested or validated curricula and materials if possible;
  - c) Provide classes in a culturally and linguistically appropriate manner; and
  - d) Conduct pre- and post-assessments to gauge the level of knowledge gained by recipients.
2. Medical and Mental Health Navigation and Support
  - a) Assist the participant with medical and mental health navigation; and
  - b) Develop a plan of care (POC) for each participant that includes clearly defined and appropriate referrals and access to medical and mental health assistance or insurance to sufficiently address the health needs of the individual. POCs must complement any health care plan established by medical professionals for the participant.
3. Adjustment Groups, Skill-Building Networks, and Peer Support Meetings
  - a) Provide wellness group activities in a culturally and linguistically appropriate manner; and
  - b) Conduct pre- and post-assessments to assess the level of improvement in well-being due to attending wellness groups.

### 2.8.2 Required Activities and Services\*

The Sub-recipient is required to provide one or more of the following activities and services that promote the health and well-being of refugees and other eligible populations in accordance with [ORR Policy Letter 20-05](#):

1. Provide opportunities to increase health literacy,
2. Coordinate health care, and
3. Organize wellness groups for individuals and/or families.

\*RHP activities and services must not duplicate services provided by the ORR-funded Preferred Communities program to families who are co-enrolled in both programs.

### 2.8.3 Other Guidelines

1. For activities involving groups, providers should:
  - a) Annually assess relevant health topics, activities, and identify target populations;
  - b) Provide services based on validated curricula, if available, effective interventions, or promising practices;
  - c) Deliver services in a manner that participants will understand; and

- d) Conduct pre- and post-assessments of group activities and use the information to improve program services.
2. For activities directed at the individual-level, providers should:
- a) Establish criteria to identify the most in need of receiving individual services offered;
  - b) Identify goals based on the individual's need;
  - c) Develop customized activities toward the specific needs of the individual; and
  - d) Track progress and outcomes toward identified goals.

## 2.9 ReMHI-CB

### 2.9.1 Allowable Activities and Services

The Sub-recipient may provide any of the following activities in accordance with [ORR Policy Letter 20-05](#) and [ORR Policy Letter 22-06](#), provided that they support the delivery of high-quality mental health and wellness services to refugees by RHP Sub-recipients or licensed mental health services providers:

1. Identify and conduct outreach to licensed mental health services providers versed in trauma informed services to determine potential partners for RHP Sub-recipients.
2. Conduct outreach and provide educational opportunities for refugees to learn about mental health and emotional wellness to decrease stigma about, and increase access to, mental health services. Workshops may be provided by a CHW or outside subject matter experts.
3. Develop Wisconsin-specific training curriculum for licensed providers and RHP Sub-recipients on refugee mental health or other related topics that respond to provider-specific needs; and/or partner with local refugee resettlement agencies and/or ethnic community-based organizations to provide such trainings. Where possible, training curriculum should be developed using existing and evidence-based and professionally validated training curriculum for mental health providers working with refugees;
4. Provide training for interpreters specific to mental health and/or partner with local refugee resettlement agencies and/or ethnic community-based organizations to provide such trainings;
5. Provide Wisconsin-specific trainings that support high-quality and effective delivery of services to refugees by licensed mental health providers in the services areas of refugee resettlement agencies;
6. Increase the pool of Mental Health First Aid (MFHA) instructors in the refugee resettlement network by sponsoring MFHA certification training fees. New MFHA instructors who received sponsored fees are expected to conduct trainings that build mental health capacity in refugee communities and among refugee-serving providers;
7. Facilitate collaborative relationships between licensed mental health service providers and refugee-serving organizations to ensure a well-coordinated referral process; and
8. Assist mental health service providers to develop and implement strategies to mitigate cultural and language barriers to mental health services.

### 2.9.2 Required Activities and Services

The Sub-recipient may provide any of the following activities in accordance with [ORR Policy Letter 20-05](#) and [ORR Policy Letter 22-06](#):

1. Deliver activities and services that build the capacity of licensed mental health providers and increase the availability and quality of mental health services for refugees.
2. Deliver activities and services that support RHP Sub-recipients to provide mental health services to refugees that are client-centered, trauma-informed, strengths-based, culturally and linguistically appropriate, and delivered in a manner that refugees understand;
3. Meet monthly with the State Refugee Health Coordinator (SRHC) and BRP. Collaborate with SRHC and BRP staff on information dissemination, networking, and technical assistance.
4. Use an equity lens to develop services and activities that support refugees' access to high-quality mental-health services regardless of their race, religion, gender identity, sexual orientation, disability, or other characteristic(s). This includes:
  - a) Review existing programming with an equity lens to identify and eliminate barriers that may prevent the full participation of some groups.
  - b) Practice inclusion through purposeful collaboration and engagement with ethnic communities to inform service design and delivery.
  - c) Design programming to respond to existing gaps in mental health services for refugee populations; and
5. ReMHI-CB activities and services must not duplicate services provided by the ORR-funded Preferred Communities program to families who are co-enrolled in both programs.

## **2.10 RSI/ARSI/URSI**

### **2.10.1 Allowable Activities and Services**

The Sub-recipient may provide any of the following services in accordance with [45 CFR § 400.155](#):

1. Regular School Programs offering intensive English language instruction as a second language for refugee children;
2. Orientation to refugees on the education system and school requirements, such as student attendance and performance;
3. Involvement of trained teachers/staff/administrators that are familiar with refugees' culture and language;
4. After school tutoring and/or mentoring programs focused on helping refugee students understand and complete assignments;
5. After school/summer programs that support remedial work or promote school readiness;
6. Mentoring programs;
7. Interpreter services for parent/teacher meetings and conferences;
8. Bilingual/bicultural counselors and aides;
9. Training staff on refugee culture and use of special teaching materials;
10. Use of modern technology deemed to speed up English language acquisition and other school related skills;
11. Use of special educational materials proven to help children with learning disabilities;
12. Programs enhancing linguistic and cultural competence in service provision;
13. Programs that allow for collaboration between newcomer populations and American born youth on academic or social activities;

14. Facilitating childcare access and capacity development;
15. Supporting early childhood education;
16. Facilitating parent integration and education on early care and education; and
17. Providing holistic sessions with parents and children

### **2.10.2 Required Activities and Services**

Applicant must provide **direct services** to refugee students that meet the eligibility requirements.

## **2.11 RYM/ARYM**

### **2.11.1 Allowable Activities and Services**

The Sub-recipient may provide any of the following services in accordance with [45 CFR § 400.155](#):

1. Provide support in the development of social and life skills;
2. Assist refugee youth to learn American culture while maintaining and celebrating the youth's cultural heritage;
3. Provide opportunities for social engagement with peers;
4. Provide information or referral for opportunities to participate in civic and community services activities;
5. Provide tutoring or other academic supports in the areas of English language, math, or other social, educational, or vocational skills;
6. Assist with transitions in school, such as the transition between middle and high school, or high school to post-secondary education;
7. Support career development through vocational skill building, resume drafting, training on workers' rights, or other career-focused trainings;
8. Provide opportunities that support development in health and financial literacy; and
9. Provide incentives for participation, such as paying registration fees or tuition costs for educational and vocational development activities, including internships or apprenticeships; or provision of school supplies or related materials that support successful achievement in school or a career.

### **2.11.2 Required Activities and Services**

The Sub-recipient must deliver all the following services to all refugees enrolled in RYM funded programs, unless otherwise exempted by BRP:

1. Provide direct services to eligible refugee youth;
2. Perform an initial assessment of the needs and goals of the youth and develop a plan to meet those needs through educational, vocational, and social activities;
3. Provide case management that includes documentation of the services received by each youth, and their progress toward meeting their needs and goals;
4. Recruit and train mentors on how to support refugee youth;
5. Screen potential mentors for history of criminal activity and/or child abuse; and
6. Train all mentors through a formal training program.

## 2.12 RCDS

### 2.12.1 Allowable Activities and Services

The Sub-recipient may provide any of the following employment or employability services:

1. Employment services, including development of a family self-sufficiency plan and an individual employability plan, world-of-work and job orientation, job clubs, job workshops, job development (conducting mock interviews, developing resumes, etc.), referral to job opportunities, job search, and job placement, follow-up, or retention services;
2. Employability assessment services, including employment-related aptitude and skills testing;
3. On-the-job training, including paid and unpaid internships or similar work experiences, when such training is provided at the employment site and is expected to result in full-time, permanent, unsubsidized employment with the employer who is providing the training;
4. English language instruction, with an emphasis on English as it relates to obtaining and retaining a job;
5. Vocational Skills training, including driver education and training (as well as other skills trainings customized for specific employment opportunities,) when provided as part of an individual employability plan;
6. Skills recertification;
7. Day-care for children, when necessary for participation in an employability service or for the acceptance or retention of employment;
8. Transportation (including provision of bus passes, courses that teach refugees to obtain and keep driver's licenses, etc.) when necessary for participation in an employability service or for the acceptance or retention of employment;
9. Translation and interpreter services, when necessary, in connection with employment or participation in an employability service;
10. Case management services, specifically for refugees who are considered employable, if such services are directed toward a refugee's attainment of employment or career development. Case management services are defined as the determination of which service(s) to refer a refugee to, referral to such service(s), and tracking of the refugee's participation in such service(s) Case management services for RCDS participants may include but are not limited to referral to:
  - a) General Education Diploma (GED), High School Equivalency Diploma (HSED), Adult Basic Education (ABE) or similar general education or secondary education programs;
  - b) Post-secondary education or professional training programs;
  - c) Recredentialing services (i.e., services that assist a participant to transfer overseas degrees and certifications to U.S. equivalents);
  - d) Any other service that supports the participant's career development;
11. Assistance in obtaining Employment Authorization Documents;
12. Job shadowing, or career exploration through hands on observation of a professional in the participant's preferred career role or industry; and
13. Any other service that supports career development, with written approval from BRP.

## 2.12.2 Required Activities and Services

The Sub-recipient must deliver all of the following services to all refugees enrolled in RCDS program, unless otherwise directed or exempted by BRP:

1. Develop a Family Self-Sufficiency Plan (FSSP) for all enrolled refugees and their family members who live in the same household and are currently enrolled in a BRP-funded refugee program; and develop an individual Employability Plan (EP) for all adult individuals; in accordance with [ORR Policy Letter 21-06](#) and [BRP Operations Memo 21-01](#) , within 30 days of RCDS program enrollment. For refugees who already have a current FSSP recorded in WRPD via an enrollment in RSS-E&E or RCDS by another agency, the Sub-recipient must coordinate with the agency that created the FSSP to make updates as needed. For refugees enrolled in FoodShare Employment and Training Program (FSET), Wisconsin Works (W-2), or Refugee Cash Assistance (RCA), development of this plan may be done in collaboration with the local agency issuing such benefits. Note that the RCDS goals for and barriers to employment, as described in FSSP guidance, should be more oriented towards career advancement than the “earliest possible employment” of the participant;
  - a) An FSSP is defined in [45 CFR § 400.71](#) as:

“A plan that addresses the employment-related service needs and career development goals of the employable members in a family for the purpose of enabling the family to become self-supporting through the employment of one or more family members and supporting the employable adults to enter a career of their preference.”
  - b) An EP is defined in [45 CFR § 400.71](#) as:

“An individualized plan for a refugee registered for employment services that sets forth a program of services intended to result in achieving career development goals and addressing barriers related to career advancement.”
2. Share FSSPs and individual EPs of participants who are co-enrolled in W-2, RCA, FSET, or other BRP-funded refugee programs with agencies who administer these benefits, if such agencies request a copy of the FSSP or EP for the purpose of establishing eligibility in said benefits. Any allowable activities and services as listed in Section 2.14.1 above is considered a required service or activity to be provided by the Sub-recipients if such an activity is recorded in a refugee’s FSSP or EP as necessary for the fulfillment of that plan;
3. Revise FSSPs and EPs for all enrolled refugees as needed, but not less than once every six months, during an in-person, phone, or virtual enrollment appointment. All revisions of FSSPs and individual EPs for refugees enrolled in W-2, RCA, FSET or other BRP-funded refugee programs must also be forwarded to the local agency issuing those benefits if such agency has previously requested a copy of the participant’s FSSP or EP;
4. Provide or refer refugees for services that help them implement their assigned activities, overcome barriers, and achieve their goals as recorded in their EP and FSSP. Similarly, provide or refer for other services that address health, social, education, or financial issues that arise during employability service provision. Sub-recipients and other agencies may exchange information about refugee participants upon receipt of releases of information signed by the participant;
5. Ensure all refugees who receive RCA and are concurrently enrolled in RCDS fulfill their employment and training program participation requirement in order to remain eligible for the RCA benefit;
6. Share information regarding job entry, participation in activities assigned in FSSPs or EPs, or other information related to eligibility of participants who are co-enrolled in W-2, RCA, FSET, or other BRP-funded refugee programs, with agencies who administer these benefits, if such

agencies request such information for the purpose of establishing eligibility in said benefits in accordance with [ORR Policy Letter 16-08](#);

7. Confirm whether participants are employed 90 days after they enter a job;
8. Adhere to all State-issued policy Operations Memos released concerning employment and employability of refugee participants co-enrolled in W-2, FSET, or RCA; and
9. Administer participant satisfaction surveys to a random sample of 20% of the adult caseload per year.

## **3.0 DOCUMENTATION AND VERIFICATION**

This section describes requirements related to documentation and verification for all BRP programs except for RCA and RMA, which are described separately in this manual.

### **3.1 Introduction**

In order to meet program requirements, BRP-funded agencies must properly document and/or verify certain details about any individual enrolling in a BRP-funded program, including that individual's identity, immigration status, date of birth, date of program eligibility, service delivery, and other details specific to certain programs. Requirements include keeping original (or photocopied) items as evidence of the information, and/or recording written information about the case. In some instances, keeping documents and recording written information are both required.

All documentation and records maintenance requirements will be satisfied by the Sub-recipient's satisfactory use of the WRPD. The Sub-recipient must, therefore, attend any WRPD-related trainings offered by BRP and must adhere to any requirements or other forms of guidance communicated by BRP as it pertains to the operation of WRPD or the maintenance of documentation and records.

### **3.2 Documentation and Verification Requirements**

In the provision of services, the Sub-recipient must maintain documentation and records that verify service delivery, participant eligibility, and compliance with all program requirements. All individuals served in a family must have clear documentation of the services provided to them and be reported on all required reports. This documentation and all related records must be recorded in WRPD, along with the uploading of any corresponding verification documents.

The Sub-recipient must enter all required records into the WRPD within 10 working days of the occurrence to be recorded, unless otherwise and specifically stated within this manual. This includes both written documentation and the uploading of documents. For example, when a service is provided to an individual, it must be documented in WRPD within 10 working days of the service. For another example, when an agency determines an individual to be eligible for a program and enrolls them in that program, the required items verifying the individual's eligibility must be uploaded within 10 working days of enrollment. All such verification requirements are detailed in Section 3.2.4 (Table 2) below and must be completed within 10 working days.

#### **3.2.1 Documentation Using Case Notes and Case Comments**

Documentation requirements may be met in WRPD by making either case notes or case comments. Case comments are written in designated "Comments" boxes that are related to a specific service or other function, such as making a referral or recording a job entry. Case comments are viewable in chronological succession only by viewing that specific type of service or function in WRPD. Case notes are written using

the Case Notes function in WRPD, separate from specific services or other functions, and viewable together in chronological succession. As of the publication of this manual, both case notes and case comments satisfy documentation requirements. The only difference between them is where they are located and how they may be viewed in WRPD. Users may opt to use one or the other, depending on the ease of use related to the circumstances.

Whether users opt to use case notes or case comments for any particular requirement to record written information about a case, these must be entered within ten working days of the occurrence. For example, if Emergency Services were provided to an individual, the service must be recorded and a corresponding case note or case comment describing the service must be written, both within ten working days of providing Emergency Services.

Case notes or comments must be written in third person (e.g., “Case Manager changed address information based on client report”) and must include basic information such as “who was involved”, “what happened”, “when”, as well as noting any important follow-up that must be done or has taken place.

### 3.2.2 Verification Using the WRPD Document Upload Feature

Using the document upload feature of WRPD, original or photocopied documents may be added to an individual’s electronic WRPD case file. In some instances, a document must be uploaded and a case note or comment must be made in order to verify certain information. In other instances, simply recording the service or uploading a document in WRPD is sufficient and no additional documentation is necessary. These requirements are detailed in Section 3.2.4 (Table 2).

When a document is uploaded into WRPD, the user must select from four WRPD Document Categories. Examples of which documents may be considered under which categories are found in Section 3.2.3 (Table 1) below. This is not an exhaustive list because agencies may find it helpful to upload any number of documents related to the unique circumstances of an individual’s case. Filing these documents under broad document categories avoids limiting the types of documents that may be uploaded.

Guidance pertaining to the requirements of any DCF Published Forms is not part of this memo. Existing forms should continue to be used as they have been used historically, and may now be uploaded into WRPD if a form is a requirement of a specific program. Any new forms will be published along with instructions pertaining to their specific use.

### 3.2.3 Table 1: WRPD Document Categories

WRPD Document Category	Example Documents
DCF Published Forms	Release of Information Individualized Employability Plan (IEP)
Immigration-Related Documents	I-94 Passport with eligible stamps Employment Authorization Document with eligible code Order of Release on Recognizance form
Other ID Verification Documents	SSN card Driver’s License State ID

Other Supporting Documentation	Check stubs Appointment confirmation Class attendance sheet
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The following chart details information for which additional verification and/or documentation is required, beyond what is entered into WRPD. If a particular data field or service is not found on the table below, that data field or service does not require any additional verification or documentation. For such data fields and services, simply entering the information into WRPD in the course of regular reporting requirements is sufficient. For data fields and services that require additional verification or documentation, those requirements can be found in Section 3.2.4 (Table 2) below.

The information required for each BRP-funded program depends on that program's reporting requirements. For example, the Refugee Medical Screening verification details apply only to programs required to provide that service, while immigration status verification details apply to all BRP-funded programs. Contracted agencies are responsible for knowing the reporting requirements associated with the specific programs that they administer. If applicable, the Sub-recipient must maintain class/group-level documentation, such as dates, topics, and attendance on an ongoing basis.

### 3.2.4 Table 2: WRPD Data Fields and Services Requiring Verification

WRPD Data Fields Requiring Verification and/or Case Notes		
Data Field	Acceptable Forms of Verification	WRPD Document Category
Immigration Status	-See <a href="#">Status and Documentation Requirements for the ORR Refugee Resettlement Program</a> * for all ORR-eligible statuses and each of their corresponding acceptable verification documents	Immigration-Related Documents
Alien Number	-Same as above; alien number may not be immediately available, but once it has been entered into WRPD, a corresponding verification document must be uploaded	-Immigration-Related Documents
SSN	-SSN card	Other ID Verification Documents
Identity (not related to immigration status; e.g., name)	-Any unexpired immigration document  <b>OR</b> -Any other reliable, state-issued document that verifies identity	Immigration-Related Documents  <b>OR</b> Other ID Verification Documents

Date of Birth	-Any unexpired immigration document that includes a date of birth, from the above ORR resource  <b>OR</b> -Any other reliable, state-issued document that verifies birth date	Immigration-Related Documents  <b>OR</b> Other ID Verification Documents
Date of Eligibility (e.g., Date of Arrival, Date Entered Into Community, Date Status Granted, etc.)	-Any unexpired immigration document that includes date of arrival to the US or date of eligible status granted, from the above ORR resource	Immigration-Related Documents
Participant Consent	-Bureau of Refugee Programs Participation Agreement (DCF-F-5633-E)	DCF Published Forms
Associated Enrollment	- Bureau of Refugee Programs Participation Agreement (DCF-F-5633-E)	DCF Published Forms
Case Notes or Comments	-Case notes or comments must have a corresponding verification item if: <ol style="list-style-type: none"> <li>1. They describe a change that was made to data entered by another agency (e.g., alien number corrected, corresponding Immigration Document uploaded) <b>(Exception: address changes do not require a verification item, only a case note or comment)</b></li> <li>2. They describe an interaction for which a Confidential Release of Information and Discussion (DCF-F-5632-E) form was used (e.g., case notes document a discussion with a sponsor)</li> </ol>	<ol style="list-style-type: none"> <li>1. Dependent on the change that was made</li> <li>2. DCF Published Forms</li> </ol>
<b>WRPD Services Requiring Verification and/or Case Notes</b>		
<b>Service</b>	<b>Acceptable Forms of Verification</b>	<b>WRPD Document Category</b>
Filed Immigration Forms (e.g., Affidavit of	-A copy of the application receipt must be uploaded	-Immigration-Related Documents

Relationship, form I-730, form I-821, etc.)		
Any Additional Service (approved by DCF)	-Case notes or comments describing the additional service are required	N/A
Case Management (referral)	-Case notes or comments describing the referral are required -If applicable, any referral form(s) completed must be uploaded	N/A -Other Supporting Documentation
Complete N-400 (Citizenship Assistance)	-A copy of the completed form filed must be uploaded	-Immigration-Related Documents
Complete N-648 (Citizenship Assistance)	-A copy of the completed form filed must be uploaded	-Immigration-Related Documents
EAD Assistance	-Case notes or comments describing the EAD assistance are required	N/A
Emergency Services	-Case notes or comments describing the Emergency Services are required	N/A
Fee Waiver (Citizenship Assistance)	-A copy of the completed fee waiver must be uploaded	-Immigration-Related Documents
Health-Related Services	-Case notes or comments describing the Health Related Services are required	N/A
Immigration-Related Legal Services	-Case notes or comments describing the Immigration-Related Legal Services are required -If applicable, any immigration forms completed must be uploaded	-N/A -Immigration-Related Documents
Refugee Medical Screening (RMS)	-In addition to completing the RMS page, case notes or comments are required and must indicate when the After Visit Summary (AVS) has been received and where it is stored ( <i>Do not upload the AVS</i> )	
SSI Application Approval	-The SSI Application Approval must be uploaded	-Other Supporting Documentation
Wellness Group post-assessment completed with improved well-being	-Wellness Group post-assessment must be uploaded	-Other Supporting Documentation

\*This ORR document is the most comprehensive resource for acceptable proof of all ORR-eligible statuses. Please contact [DCFRefugee@wisconsin.gov](mailto:DCFRefugee@wisconsin.gov) with related questions.

It is only necessary to verify information in Table 2 once. If one of the acceptable sources of verification is already present in WRPD at the time of program enrollment, use the existing documentation to verify, but note that all program staff are responsible for ensuring that program’s requirements have been met.

### 3.2.5 Other Documentation Guidance: Record Retention

In accordance with Wisconsin Statute § 16.61, DCF Retention Disposition Authorization (RDA) 00293000, and [45 CFR § 92.42](#), all records and documentation relating to activities and services provided under all programs must be retained by the Sub-recipient for a minimum of seven years following the last day of the contract period. In the event the Sub-recipient is unsure whether a document qualifies as a record that must be retained, the Sub-recipient must contact their BRP Contract Monitor for clarification.

## 4.0 ORR GLOSSARY OF TERMS/DEFINITION OF SERVICES

BRP uses ORR’s definitions for services. Therefore, the following list of terms was compiled from various locations on ORR’s website, among reporting templates and instructions (<https://www.acf.hhs.gov/orr/form/report-forms>).

These definitions must be adhered to when reporting services. If a Sub-recipient has questions about whether a particular service has been provided, that Sub-recipient should reach out to their designated Contract Manager at BRP for clarification.

Employment	Employment services are direct services provided in accordance with an employability plan that assist an employable adult in preparation for, development of, placement in, or maintenance of employment, as defined in 45 CFR § 400.154(a).
Employability	Employability services may support employment in the long run, but are not services immediately related to helping an individual obtain employment.
Employment Assessment	Employment assessment services include aptitude and skills testing associated with obtaining or retaining employment.
On-the-Job Training	Includes on-the-job training provided at the employment site and is expected to result in full-time, permanent, unsubsidized employment with the employer who is providing the training.
English Language instruction	Includes English language instruction, with an emphasis on English as it relates to obtaining and retaining a job. These may be employment or employability services, depending on how immediate the employment goals are of the individual receiving English language instruction.
Vocational Training	Vocation training should be short-term designed to teach refugees specific job-related skills that prepare them for a specific job or type of employment, such as driver education, nurse’s aide, electronic assembly, or power sewing.
Skills Recertification	Skills recertification services provided when such training meets the criteria for appropriate training in 45 CFR §400.81(b). Skills trainings are employability services because they are trainings that someone needs to complete before they can get a job. Examples include: day care, fork-lift, or sewing. These are specific, formal trainings, as you can see by the “Training Period” choices, which are 0-

	30 days, 1-3 months, etc. Report "enrolled" for a trimester during which a client is enrolled in this type of training.
Day Care for Children	Day care for children received when necessary for participation in an employability service or for the acceptance or retention of employment; or when necessary for participation in a service other than employability.
Transportation	Transportation services provided when necessary for the acceptance/retention of employment; or when necessary for participation in a service other than an employment/employability service (e.g. driving someone to a job interview, or driving someone to an urgent appointment).
Translation and Interpreter Services	Translation and interpretation services provided to refugees in connection with employment or employability services; or when necessary for a purpose other than in connection with employment and as part of an employability plan.
Case Management	Case management services are defined as the determination of specific service(s) to which to refer a refugee; and, may be related to active participation as part of the individual employability plan, referral to such service(s), and tracking of the refugee's participation in such services; or may be for a purpose other than in connection with employment or participation in employability services.
EAD Assistance	Assistance in obtaining Employment Authorization Documents (EADs).
Information and Referral	Includes information and referral to other services for participants. Report regardless of whether the referral is internal to ORR funded services, or external to an agency not funded by ORR.
Outreach Services	Includes activities designed to familiarize refugees with available services, to explain the purpose of these services, and facilitate access to these services. This pertains either to people who are currently being served (e.g., providing referrals or doing outreach on their behalf for services) or former clients who are still eligible for ORR services (i.e., outreach to reconnect with these clients).
Social Adjustment	Social adjustment services include emergency services, health related services, and home management services.
Emergency services	Assessment and short-term counseling to persons or families in a perceived crisis; referral to appropriate resources; and the making of arrangements for necessary services.
Health-related services	Information; referral to appropriate resources; assistance in scheduling appointments and obtaining services; and counseling to individuals or families to help them understand and identify their physical and mental health needs and maintain or improve their physical and mental health.
Home management services	Formal or informal instruction to individuals or families in management of household budgets, home maintenance, nutrition, housing standards, tenants' rights, and other consumer education services.
Citizenship and Naturalization	Preparation services for citizenship and naturalization, including English Language training and civics instruction to prepare refugees for citizenship, application assistance for adjustment to legal permanent resident status and citizenship status, assistance to disabled

refugees in obtaining disability waivers from English and civics requirements for naturalization, and the provision of interpreter services for the citizenship interview.
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## **5.0 REFUGEE CASH ASSISTANCE**

Refugee Cash Assistance (RCA) guidance is located in Chapter 18 of the [W-2 Manual](#). Its relocation to this manual will be announced in a future Ops Memo.

## **6.0 REFUGEE MEDICAL ASSISTANCE**

Refugee Medical Assistance (RMA) guidance is located in Chapter 18 of the [W-2 Manual](#). Its relocation to this manual will be announced in a future Ops Memo.

## **7.0 RESOURCE REFERENCE**

ORR reporting templates and instructions: <https://www.acf.hhs.gov/orr/form/report-forms>

ORR Policy Letters: <https://www.acf.hhs.gov/orr/policy-guidance/policy-letters>

ORR Status and Documentation Requirements: <https://www.acf.hhs.gov/orr/policy-guidance/status-and-documentation-requirements-orr-refugee-resettlement-program>

WRPD Login: <https://clienttrack.eccovia.com/login/WIRefugee>

BRP Operations Memos: <https://dcf.wisconsin.gov/refugee/providers/policy/memos>

Sign up for BRP Updates: <https://dcf.wisconsin.gov/refugee/providers/policy/memos/sign-up>

W-2 Manual: <https://dcf.wisconsin.gov/manuals/w-2-manual/Production/default.htm>



## Wisconsin Department of Children and Families

The Department of Children and Families is an equal opportunity employer and service provider. If you have a disability and need to access services, receive information in an alternate format, or need information translated to another language, please call the [PROGRAM AREA or DIVISION at NUMBER]. Individuals who are deaf, hard of hearing, deaf-blind or speech disabled can use the free Wisconsin Relay Service (WRS) – 711 to contact the department.