



TO: **BRP-Funded Agencies**

FROM: Bojana Zorić Martinez, Director
Bureau of Refugee Programs
Division of Family and Economic Security
Department of Children and Families

**SUBJECT: Change in Eligibility Period for
RCA and RMA**

BRP OPERATIONS MEMO

No: 25-15

DATE: 04-08-2025

RCA ☒ **RMA** ☒ **RMS** ☒ **RHP- any** ☐

RSS-E&E ☐ **RSS-OS** ☐ **SOR- any** ☐

ARSS (AIRLS) ☐ **URSS (UIRLS)** ☐

RSS-ESL, Wis Lit ☐

WFTCP ☐ **RSI- any** ☐ **RYM- any** ☐

CROSS REFERENCE: [FR 2025_04839](#)
[BRP Policy Manual](#)
[45 CFR Part 400](#)

EFFECTIVE DATE: MAY 5, 2025

PURPOSE

The purpose of this memo is to provide guidance on the Federal Office of Refugee Resettlement's (ORR) decision to shorten the eligibility period for Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA) from 12 months to four months. The four-month eligibility period applies to any RCA and/or RMA participant who becomes eligible **on or after May 5, 2025.**

BACKGROUND

The eligibility period for RCA and RMA, authorized by the ORR Director in accordance with 45 CFR § 400.211(b), was eight months from FY 1992 until FY 2022, when it was increased to 12 months.

On March 21, 2025, the ORR Director published a [Notice of Change of Eligibility](#) ("the Notice") that shortens the eligibility period for RCA and RMA from 12 months to four months. The change becomes effective within 45 days of the Notice, which is May 5, 2025. The Notice applies only to refugees whose date of eligibility for ORR benefits falls on or after that date.

The Notice occurs in conjunction with other federal changes in refugee admissions and funding. The President's [Executive Order No. 14163](#) and U.S. State Department Notices have indefinitely suspended refugee admissions and cut federal funding for resettlement programs. Litigation is ongoing. See, e.g., *Pacito v. Trump*, Case No. 25-cv-00255 (W.D. Wash). Given rapid evolutions in related litigation and policy, DCF will adapt guidance and provide updates as necessary.

POLICY

For RCA and RMA participants for whom eligibility is determined on or after May 5, 2025, several policy areas will be impacted by the shortened eligibility period. Those various impacts are summarized below. Before the effective date of May 5, 2025, BRP will publish a Policy Manual Cover Sheet, which will cite each of the changes made in the manual.

RCA

Eligibility

The eligibility time period for RCA shall be revised from 12 months to four months under Eligibility Overview (section 5.4.1) and Date of Eligibility (section 5.4.3), as well as in all incidental references to the 12-month eligibility period throughout the manual.

Eligibility Reviews

The Eligibility Review policy (section 5.6.7) shall be revised. The requirement to conduct a six-month eligibility review will be eliminated, due to the significantly shorter overall eligibility period. Administrators of the RCA program shall continue to inform RCA participants of RCA program requirements, including the requirement to report changes during the initial enrollment period and during the 30-day Eligibility Review. As per current policy (section 5.4.7.4), information about an active case may still be gathered at any time outside of these prescribed review periods if there is a reason to review the case.

Sanctions

Due to the federal requirement to institute sanctions at intervals of no less than three months (authorized by 45 CFR 400.82(c)), the RCA policy on Sanctions (section 5.4.7.4) shall be revised. Given that sanctions are applied for three months at a time beginning on the 30th day from the enrollment appointment, a Full Sanction due to Full Non-Compliance effectively constitutes a Case Closure. Note that there is a termination policy requirement (section 5.6.12) to mail the RCA Termination- Notice of Decision form at least 10 working days prior to the date assistance is being terminated. This policy shall not apply to cases that have closed due to a Full Sanction. Instead, RCA cases closing due to a Full Sanction shall be considered closed upon issuing the RCA Sanctions- Notice of Decision form, indicating that RCA benefits have stopped. This form, as per current policy (section 5.6.8), must be completed and mailed to the RCA recipient within five working days of the discovery of non-compliance.

For RCA participants to whom a Partial Sanction has been applied, the amount indicated on the RCA Sanctions- Notice of the Decision form shall represent the payments the participant can expect to receive for the remainder of their eligibility period, assuming no other changes.

Furthermore, given the short eligibility period, it will be impossible to apply multiple sanctions to any case. Section 5.4.7.4 shall be revised to reflect this change.

RMA

Eligibility

The eligibility time period for RMA shall be revised from 12 months to four months under RMA Nonfinancial Eligibility (section 6.4) and Date of Entry to the U.S. (section 6.4.2), as well as in all incidental references to the 12-month eligibility period throughout the manual.

Refugee Medical Screening (RMS)

Eligibility

As a component of the RMA program, the eligibility time period during which RMS required and allowable services may be provided shall be revised from 12 months to four months, as detailed under Time-Limited Eligibility (section 1.2.2) of the BRP Policy Manual.

Current contractual and reporting language will be reviewed and updated to reflect the revised eligibility period and BRP will subsequently provide guidance and technical assistance regarding any such revisions.

REPORTING

Not applicable

DOCUMENTATION

Revised versions of the following RCA and RMA forms shall be published to the [DCF Forms](#) website in advance of the effective date of May 5, 2025, at which time agencies must ensure that the updated forms, including any existing translated version, are the only forms in use.

DCF-F-5764 RCA Eligibility Reviews
DCF-F-13753 RCA Eligibility- Notice of Decision
DCF-F-13758 RCA Ineligibility- Notice of Decision
DCF-F-13770 RCA Sanctions- Notice of Decision

TRAINING

BRP will provide an optional technical assistance session on April 17, 2025. Meeting invites will be sent via BRP's general email communications list prior to April 17, 2025.

AGENCY ACTION

Following the effective date of May 5, 2025, the revised eligibility period policies detailed in this memo must be followed unless otherwise noted.

ATTACHMENTS

Not applicable

CONTACTS

For BRP Policy Questions: DCFRefugee@wisconsin.gov

For WRPD Questions: DCFWRPDSupport@wisconsin.gov

DCF/DFES/BRP/RD