

Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA) Extension
Based on the Administration for Children and Families (ACF) Office of Refugee
Resettlement (ORR) Policy Letter #20-03

Questions & Answers

Refugee Cash Assistance (RCA)

Under authority from the federal Office of Refugee Resettlement (ORR) RCA eligibility period is extended from eight months to up to eighteen months for clients who are about to terminate from the program or who have successfully exited the program and then subsequently either lost employment or sustained a reduction in hours that would requalify them for RCA. The eligibility period is now extended to up to eighteen months for clients who became eligible for RCA after April 1, 2019, with the additional months not extending beyond September 30, 2020. For clients who became eligible for RCA on or after February 1, 2020, the eligibility period will remain at eight months.

The extension is for those who became eligible April 1, 2019 through January 31, 2020. For those who arrived in February and March of 2020, they will only continue to receive 8 months of refugee cash assistant. Here are some examples:

Person 1 – refugee status; arrived May 1, 2019

- RCA for three months, employed and successfully exited in August 2019
- Laid off in March 2020 due to COVID-19 and has no income
- Eligible for six months of RCA through September 30, 2020

Person 2 – final grant of asylum in September 2019

- Screened and began receiving RCA in November 2019 (Month three)
- About to roll off RCA in April 2020 (Total of eight months from date of eligibility)
- Now eligible to receive RCA through September 30, 2020 (13 months)

Person 3 – SIV, arrived February 1, 2020

- Screened eligible for RCA
- Can receive up to eight months of RCA, last month in September 2020

Q1: Does “become eligible for RCA” mean date of ORR eligibility or date of RCA enrollment?

A1: Date of ORR eligibility.

Q2: If a child was on TANF and then turned 18 on April 15, 2019, would they be eligible?

A2: No. They were TANF eligible at the time of their ORR status, which was before April 1, 2019.

Q3: Do clients who aren't currently receiving RCA but are eligible for an extension need to reapply for RCA?

A3: Yes.

Q4: *Are individuals who were seeking employment when the COVID-19 situation developed (but who were not yet employed, and continue to be unable to secure employment) eligible to receive RCA beyond the 8 months?*

A4: Yes.

Q5: *Can former Matching Grant (MG) clients be enrolled into the RCA eligibility extension, if they meet all other eligibility criteria?*

A5: Yes. If on or after April 1, 2019 – January 31, 2020, a former MG client was eligible for RCA, and has subsequently lost employment or income, and meets the income eligibility threshold for the state, the former MG client can be screened for the RCA eligibility period extension and enrolled to receive RCA through September 30, 2020. No waiver is needed for the enrollment of a previous MG client.

Please note that current MG clients are eligible for extended services through September.

Q6: *Does becoming eligible for RCA mean the date the client became ORR-eligible or the date the client enrolled in the RCA program? For example, would a client who was granted asylum on March 15th, 2019 but applied for RCA on April 15th, 2019 be eligible for the extension?*

A6: The client in the above referenced example would not be eligible. The determination is made according to the eligibility date, not the application date.

Q7: *Should W-2 agencies explore other types of assistance before they run RCA eligibility?*

A7: Yes. As defined in Chapter 2.6.1 of the W-2 Manual, Accessing Other Public Assistance Programs/Resources, a [W-2](#) Wisconsin Works applicant or participant may be required, as determined by the [FEP](#) Financial and Employment Planner, to apply for and accept other public assistance programs or resources that may be available, prior to being determined eligible for W-2 services or during W-2 participation. Other sources of public assistance or resources may include but are not limited to Unemployment Insurance (UI). As defined in W-2 Manual, Chapter 18.1, RCA is modeled after W-2, and as such, the same nonfinancial eligibility criteria apply.

Q8: *Does the receipt of unemployment benefits due to loss of employment affect eligibility for receipt of RCA?*

A8: Yes, except for FPUC.

W-2 workers must disregard the \$600 emergency increase in Federal Pandemic Unemployment Compensation (FPUC) benefits as income.

Regular Unemployment Insurance benefits must be counted toward the 115% gross income test for determining financial eligibility. In addition, the following expanded federal Unemployment Compensation benefits must be counted in the gross income test:

- Pandemic Unemployment Assistance (PUA) benefits for individuals not eligible for regular unemployment benefits; and
- Pandemic Emergency Unemployment Compensation (PEUC) benefits for individuals who have exhausted their regular unemployment benefits.

Program	Regular Unemployment Compensation	PEUC	PUA	FPUC
RCA	Counted as income	Counted as income	Counted as income	Disregarded as income

Q9: *If yes, are clients eligible for partial RCA dependent upon the amount of unemployment benefits received?*

A9: No. Per W-2 Manual, Chapter 18.2.5.2.3 Estimated Income, “As in W-2, the RCA group’s income only affects eligibility and does not affect the amount of the RCA payment. The payment amount is a flat grant determined solely by the employment position in which the adult is participating.”

Q10: *Can RCA be issued pending unemployment insurance or COVID-19 pandemic unemployment insurance?*

A10: Yes. The state can issue RCA pending the receipt of unemployment insurance. However, the state must ensure that there is no dual receipt or “double dipping” of federal funding. For example, if a state pays a client a full month of RCA for May 2020, and the client receives unemployment insurance for May 2020, the client must repay the RCA for the month of May. A state must conduct eligibility determinations on a regular (e.g. monthly) basis as outline in its respective state or RD plan, in order to ensure that a client has not earned income that exceeds the income eligibility standard.

Q11: *Does the receipt of the COVID-19 stimulus check affect a client’s eligibility to receive RCA during the month the stimulus check is received?*

A11: No.

Q12: *Can RCA payments be retroactive if clients reach out to us a few months after they have been laid off due to COVID-19 as a result of an assumption that we would not be able to assist with RCA?*

A12: No. The intent is to address the lack of income or inability to gain employment in this job market due to COVID-19 and the response to address it. However, if a client is re-screened for eligibility in May 2020 or thereafter, the state may retroactively pay RCA for the month of April 2020, if the state can confirm that the client had no income or lost income to meet the state’s financial eligibility standard.

Q13: *Will individuals with reduced hours and income as a result of COVID-19 be eligible for the full amount of RCA or a pro-rated amount only based on income?*

A13: Individuals who are financially and nonfinancially eligible to receive an RCA payment will receive the full payment according to their placement.

Q14: *With clients who are currently receiving the benefits, the state can manually extend their benefits until September, correct?*

A14: Yes.

Q15: *How should I document the extended eligibility period?*

A15: Use the usual DCF Notice of Decision forms, but please reference the terms of the policy letter to determine the start and end dates of the eligibility period. Indicate in case comments the reason (COVID-19) for the extended eligibility period.

Refugee Medical Assistance (RMA)

Refugee Medical Assistance (RMA) eligibility period is extended from eight months to up to eighteen months for clients who became eligible for RMA after April 1, 2019, with the additional months not extending beyond September 30, 2020. For clients who became eligible for RMA after February 1, 2020, the eligibility period will remain at eight months.

Q1: *For RMA, if someone is receiving Medicaid, and income makes them ineligible during extended 18-month period, can they default to RMA if they arrived after 4.1.19 being within the 18-month period (per 400.104)?*

A1: Yes.

Q2: *If a client currently has no medical coverage because they were receiving Medicaid, got a job that made them ineligible, was placed into RMA, their 8 months ran out, and they still have the job, can they apply and get RMA now for the extension period?*

A2: Yes.

Q3: **Can RMA be retroactive to cover the months where the client had no health insurance coverage?**

A3: No. The intent of the is to address the lack of health insurance or loss of health insurance due to COVID-19. However, if a client is re-screened for eligibility in May 2020, the state may retroactively pay for RMA for the month of April 2020, if the state can confirm that the client did not have health insurance.

Q4: *How should I document the extended eligibility period?*

A4: Use the usual DCF Notice of Decision forms, but please reference the terms of the policy letter to determine the start and end dates of the eligibility period. Indicate in case comments the reason (COVID-19) for the extended eligibility period.