



TO: **W-2 Agencies**

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

Patara Horn, Director
Bureau of Working Families
Division of Family and Economic Security
Department of Children and Families

SUBJECT: W-2 Manual Chapter 18 Moves to BRP Policy Manual and Overview of Refugee Cash Assistance (RCA) Changes

BRP/BWF OPERATIONS MEMO			
No:	BRP 24-13		
	BWF 24-17		
DATE:	09/30/2024		
RCA	<input checked="" type="checkbox"/>	RHP	<input type="checkbox"/>
		RMA	<input type="checkbox"/>
		RMS	<input type="checkbox"/>
RSI	<input type="checkbox"/>	RSS	<input type="checkbox"/>
		RYM	<input type="checkbox"/>
		SOR	<input type="checkbox"/>
ASA	<input type="checkbox"/>	ReMHI	<input type="checkbox"/>
		WFTCP	<input type="checkbox"/>
W-2	<input checked="" type="checkbox"/>	EA	<input type="checkbox"/>
		JAL	<input type="checkbox"/>

CROSS REFERENCE: [W-2 Manual Chapter 18](#)

EFFECTIVE DATE: October 29, 2024

PURPOSE:

The purpose of this memo is to announce the relocation of the Refugee Cash Assistance program guidance contained in Chapter 18 of the W-2 Manual to the Bureau of Refugee Programs Policy Manual. This memo also serves to provide an overview of the many and significant changes made to these sections prior to the Policy Manual’s publication on the BRP website.

BACKGROUND:

RCA guidance has long been located in the W-2 Manual. A version of the BRP Policy Manual that did not include RCA was published in December of 2023. This memo announces the incorporation of RCA into the BRP Policy Manual. With that move came the opportunity to make numerous revisions to its contents. Those changes are outlined in detail in this memo.

As of October 29, 2024, the BRP Policy Manual will be the only location for RCA policies and guidance. The contents of previously published memos were incorporated into the W-2 manual and therefore will be located in the BRP Policy Manual as of October 29, 2024. All future

updates will be made to the BRP Policy Manual. As of October 29, 2024, Chapter 18 in the W-2 Manual will no longer contain RCA program guidance.

Some revisions that will be made when RCA moves from the W-2 manual to the BRP Policy Manual include minor revisions to the language used to describe existing policy, and are not all highlighted in this memo. Any revisions that represent actual changes to policy are highlighted below, and are effective as of October 29, 2024.

POLICIES:

The sections, summarized in the table below, were revised in such a way as to introduce a new policy or significantly revise existing policy. The policy changes are summarized and referenced in this memo, but administrators of the RCA program will refer to these sections of the BRP Policy Manual for complete guidance related to any changes summarized below, and must note that numerous minor changes (e.g. grammar, word choice, replacing the term “Volag” with “Resettlement Agency”) were made throughout previous RCA policy, which are not included in the below summaries.

For each highlighted change, the “Previous Policy” refers to what was found in Chapter 18 of the W-2 manual, while the “Updated Policy” will be found in the BRP Policy Manual. The section numbers in each of the headings refer to the section numbers in the BRP Policy Manual. These changes are first summarized in the table below, followed by a more detailed explanation.

Policy	Brief Summary	Page Number
5.1 RCA Overview	Minimal changes	3
5.2.1 Applying for RCA	Clarified details related to shared statewide systems	4
5.2.2 Requesting RCA	Updated language, additional details related to backdating RCA payment amounts	5
5.2.3 Completing the RCA Application	Introduces a new form and obsoletes another; significant detail added	5
5.2.4 Determining Eligibility and Making an RCA Placement	Eliminated “up front job search” language and added placement details	6
5.3 RCA Assistance Groups	Added clarifying language	8
5.4.1 Eligibility Overview	Clarifying language added	9
5.4.3 Date of Eligibility	New language to replace “date of arrival” and account for new populations	9
5.4.5 RCA and Eligibility for Other Benefits Programs	Title change, payment receipt details added	9
5.4.6 Job Quit or Job/Interview Refusal	Title change, rewritten for clarity, added language about interview refusal	11
5.4.7.1 Employment and Training Requirements	Clarifications added about E&T provider definition, assigning activities, and eligibility reviews	12

5.4.7.2 Exemptions	Introduces revised exemption policy	14
5.4.7.4 Sanctions	Introduces revised sanction policy	14
5.4.7.5 FSSP and EP Requirements	New section	17
5.5.3 115% Gross Income Test	Updated income disregard information and resources	17
5.5.9.1 Grace Period Early Employment Incentive	Updated language to account for multiple job-related changes	18
5.5.10 Counting Income	Details added pertaining to Welcome Corps	19
5.5.11 Disregarded Income	Details added pertaining to Welcome Corps	19
5.6.1 RCA Eligibility Verification Requirements	Introduces a new policy for eligibility reviews	19
5.6.1.2 Requesting Verification from RCA Participants	Clarified details related to shared statewide systems	20
5.6.7 Reviews	Introduces and fully details the new policy for eligibility reviews	21
5.6.8 Required RCA Forms	New organization of required forms, purpose, timeline	22
5.6.9 Payment Issuance and Reimbursement	Clarified payments for new placement details	23
5.6.11 RCA Case Transfers	New section	24
5.6.12 RCA Case Closures	New section	24

5.1 RCA Overview

Previous Policy

This section described the RCA program generally, without any reference to the Wisconsin Refugee Programs Database (WRPD), and without providing specific information regarding access to other systems used statewide at W-2 agencies.

Updated Policy

This section now mentions WRPD (into which RCA will eventually be implemented), and details the requirement to have access to CARES Worker Web (CWW) and Electronic Case File (ECF), in order to test W-2 eligibility, complete ongoing case note documentation, and upload forms and verification documents, as stated below:

The RCA program is administered manually, meaning that the program relies on the use of DCF forms and has not been fully implemented into either the Wisconsin Refugee Programs Database (WRPD) or any statewide system used at W-2 agencies, such as WWP or CWW. At the time of publication of this manual, W-2 agencies administering the RCA program must have the ability to test W-2 eligibility using CWW, update CWW with ongoing case note documentation, and must have the ability to upload verification documents using ECF. In future updates of this manual, upon WRPD implementation of RCA, all W-2 agencies (with the exception of the Northern and East Central W-2 Regions of Milwaukee, where RCA is not administered) will also be required to have access to and be trained in the use of WRPD. RCA applicants may present themselves to a W-2 agency anywhere in Wisconsin and must be given the opportunity to apply for programs and benefits for which they may be eligible.

5.2.1 Applying for RCA

Previous Policy

This section stated that the W-2 agency must coordinate services with the agency providing IM programs, without any clarification about the separate requirements of the program. The previous policy's lack of clarification may confuse program requirements, as W-2 agencies administering RCA may be accustomed to satisfying RCA requirements with what has already been entered by IM workers into CWW, the use of which is shared between IM programs and RCA.

The previous policy also did not provide any detail about how to ensure that potentially eligible applicants are provided with the opportunity to apply for RCA.

Updated Policy

The updated policy clarifies details about how W-2 and IM agencies may coordinate certain services in certain regions and cites the example of applying for W-2 and IM programs simultaneously. The updated policy emphasizes that despite any initial coordination that may be established practice in certain regions, IM programs and RCA programs are responsible for their own program requirements, and IM requirements cannot satisfy RCA requirements. This clarification is particularly important as BRP prepares to implement RCA into WRPD, at which time IM programs will no longer share systems between programs.

Both the previous and updated policy instruct RCA administrators to ensure RCA applicants are provided with the opportunity to apply for IM programs if they have not done so already at the time of completing the RCA application (DCF-F-DWSP14880-E W-2 and Related Programs Registration). The previous policy references W-2 policy, while the new policy details three ways of ensuring RCA applicants will have the opportunity to apply for IM programs. The new text is below:

No matter what type of initial coordination takes place with IM agencies during the application process, the W-2 agency administering the RCA program is responsible for ensuring that all RCA program requirements have been satisfied and must not rely on the IM agency to satisfy any shared program requirements.

The W-2 agency must provide RCA applicants with the opportunity to apply for IM programs, if they have not already done so at the time of completing the W-2 and Related Programs Registration (DCF-14880), whether by providing them with a link to the ACCESS application

([access.wi.gov](https://www.wisconsin.gov)), helping them to locate the correct IM agency (<https://www.dhs.wisconsin.gov/forwardhealth/imagency/index.htm>), or providing them with a paper application (<https://www.dhs.wisconsin.gov/forms/f1/f16019a.pdf>), which must be securely delivered to the appropriate agency.

5.2.2 Requesting RCA

Previous Policy

This section previously explained that resettlement agencies, formerly known as “volags”, may be involved with the application process, and did not provide sufficient detail to determine the date to which RCA payment amounts must be backdated.

Updated Policy

The updated section deleted references to “volags” and added the following language to explain in greater detail the policy for backdating payments to the date on which the application (14880) is signed:

Any specific timelines required by the RCA application process officially begin on the date the W-2 agency receives a signed version of the Wisconsin Works (W-2) and Related Programs Registration (14880). Note, however, that the first RCA payment may be backdated to the date on which the form (14880) is signed, as long as the form is received by the agency within five calendar days of the signature date. If the form is received by the agency six or more calendar days after the signature date, then the first RCA payment must be backdated to the date on which the form (14880) is received by the agency ([DCF Forms Search](#)).

5.2.3 Completing the RCA Application

Previous Policy

The previous policy included instructions about forms that have since been revised, replaced or eliminated. The previous text was as follows:

The following forms must be given to RCA applicants during the application process:

- *[RCA Participation Agreement \(15011\)](#), which outlines an RCA applicant’s rights and responsibilities and is available in English and several other languages. (Refugee Cash and Medical Assistance forms, in several languages, can be found on the [Forms webpage](#)). If the form is not available in an appropriate language, another method of communication must be used, such as verbal translation into the refugee’s native language. The form must be provided to RCA applicants and reviewed during the application process. Applicants must sign the form to acknowledge that they understand its content. The signed form must be scanned into ECF.*
- *[Rights and Responsibilities- A Help Guide \(398-P\)](#) must also be given to the applicant during the application process.*

Updated Policy

This section now describes a new form, which replaces both previously required forms/publications, with the text below:

During the initial appointment, the RCA Rules, Rights and Responsibilities Agreement (DCF-F-5765) must be completed, and must be scanned into ECF.

5.2.4 Determining Eligibility and Making an RCA Placement

Previous Policy

This previous policy suggested up front job search activities, and referenced a process that is very specific to W-2 for making an RCA placement. It also contained vague references to Kinship Care eligibility, which has been deleted from this section and expanded upon in further detail in section 5.4, as it pertains to RCA eligibility. This previous policy also referenced up front job search activities, which was not aligned with or necessary for the RCA program and was therefore eliminated. The previous policy language can be found below:

When a cash assistance application is received, determine eligibility for W-2 before determining eligibility for RCA. A refugee is not eligible for RCA if he or she is eligible for or receiving W-2 cash assistance. This applies to all refugees whether they refuse W-2 benefits or are ineligible for W-2 due to failure to comply with any eligibility requirement, including W-2 participation requirements.

The [FEP](#) must determine RCA eligibility within 7 working days after his or her first meeting with the RCA applicant using all financial and nonfinancial eligibility criteria. (See [18.2.4](#) and [18.2.5](#)) In extenuating circumstances, when the individual needs additional time to gather verification, the eligibility process can be extended up to 30 days from the date the agency receives a signed [Wisconsin Works \(W-2\) and Related Programs Registration \(14880\)](#). (See [4.1.3](#))

The [RS](#) or FEP can assign up-front job search activities as part of the nonfinancial eligibility criteria.

The FEP must not extend the application process past the 12 working days (5 working days to meet with the FEP and 7 working days for the FEP to make an eligibility determination) to accommodate a lengthier job search. W-2 agencies are prohibited from using the up-front job search requirement to delay the application process or eligibility determination.

During this 7 day period, the FEP must also work with the applicant to determine the most appropriate placement for the applicant. RCA uses three placements based on the W-2 program placements for Trial Employment Match Program (TEMP) (see 7.3.0), Community Service Jobs (CSJ) (see 7.4.1), and W-2 Transitions (W-2 T) (see 7.4.2). The RCA placement is assigned on the basis of level of job readiness. For example, the CSJ placement would typically be used for refugees who are employable but have barriers such as language, education or work experience (note: like a W-2 client, an RCA client can be placed into a partial CSJ. See 10.1), whereas the W-2 T placement would typically be used for refugees with more severe personal or family physical, mental or cognitive barriers. The W-2 agency may also make a subsidy payment to an employer to help a refugee obtain employment, in accordance with the rules for the Trial Employment Match Program.

The monthly RCA payment amount for adults and teen parents will be the same as the corresponding W-2 payment for each month in which the participant meets the employment and

training requirements. When minor children living with adult caretaker relatives form their own assistance group while awaiting an eligibility determination for [Kinship Care](#), they must be paid at the CSJ payment level unless they have severe physical, mental or cognitive barriers which warrants a W-2 T level payment.

To make the most appropriate placement decision, the FEP discusses and reviews with the applicant the:

- Results of the informal assessment (see [5.2](#));
- Results of the educational needs assessment (see [5.3](#));
- Progress made in up-front job search, if assigned (see [2.9.2](#)); and
- Results of any other vocational evaluations or formal assessment obtained during the application process (see [5.1.1](#)).

Updated Policy

As mentioned briefly above, some details of this section were deleted, while the content pertaining to the topic referenced in its title (Determining Eligibility and Making an RCA Placement) was rewritten in more detail and so that it is more appropriate for the RCA program specifically. The new policy language can be found below:

During the initial appointment with an RCA applicant, which must take place within the five working days after the date the agency receives the Wisconsin Works (W-2) and Related Programs Registration (14880) ([DCF Forms Search](#)), the FEP must determine eligibility and make an RCA placement.

In most cases, the FEP will determine eligibility during the initial appointment. If, for any reason, the FEP cannot determine RCA eligibility and make a placement during the initial appointment, the FEP must determine RCA eligibility within 7 working days after his or her first meeting with the RCA applicant using all financial and nonfinancial eligibility criteria. (see 5.4 and 5.5 of this manual). In extenuating circumstances, such as if the individual needs additional time to gather verification, the eligibility process can be extended up to 30 days from the date the agency receives Section 5.6.3 of this manual provides further guidance on how to document date of receipt) a signed Wisconsin Works (W-2) and Related Programs Registration (14880). In such cases, the FEP must document the reason(s) for using the extended time period to determine eligibility and/or make a placement.

RCA uses three placements, which determine the amount of the RCA payment and are based on some characteristics of the W-2 paid placements outlined in 7.4 of the [W-2 manual](#), with notable differences as detailed below. RCA placement decisions are based on individual's exemption status, according to section 5.4.7.2 of this manual. The placements and their corresponding payment amounts are:

- *Community Services Jobs (CSJ) (\$653): Any non-exempt (according to 5.4.7.2 of this manual) individual must be placed in a CSJ.*
- *W-2 Transition (W-2 T) (\$608): Any individual who is exempt for any of the reasons outlined in 5.4.7.2 must be placed in W-2 T*
- *Prorated CSJs: Any individual who is working part-time but remains otherwise financially eligible as outlined in 5.5 must be placed in one of the following prorated CSJs, in accordance with the number of hours worked on a weekly basis:*

- 1/3 CSJ: \$218, working 20 or more hours a week
- 1/2 CSJ: \$327, working 15-19 hours a week
- 2/3 CSJ: \$435, working up to 14 hours a week

Initial placement decisions, as well as any change in placement decisions throughout the course of processing an RCA case, must be documented.

5.3 RCA Assistance Groups

Previous Policy

Most of this section remains the same, with a few clarifying details added to the updated policy. The previous policy language is found below:

The income and assets of [RCA assistance group](#) members are considered together (see [18.2.5.1](#) and [18.2.5.2](#)) and the group receives a single cash benefit.

An RCA assistance group consists of either an applicant or an applicant and his or her spouse. An unmarried refugee 18 years or older forms his or her own RCA group, even if living with other RCA groups.

Minor teen parents and their children form another type of RCA assistance group. If either parent turns 18 during the RCA eligibility period, determine W-2 eligibility. Remove the group from RCA if the 18-year-old parent is found to be eligible for a W-2 paid placement.

Updated Policy

Clarifying language was added regarding the way non-financial eligibility rules help to determine assistance group membership and sizes. The complete updated policy is written as follows, while the examples following the policy, which are included in the policy manual, have not been revised:

An assistance group is defined as an individual or group of individuals whose income and assets are tested together when applying for public benefit programs, including Refugee Cash and Medical Assistance. Each assistance group receives a single cash benefit.

RCA assistance groups are determined by considering the nonfinancial eligibility rules, detailed in 5.4. Not every case scenario is specifically mentioned in the rules, but considering each individual's nonfinancial eligibility for RCA will result in determining who should be included in an RCA assistance group. For example, a couple with children is not eligible for RCA because they are eligible for W-2, and ineligibility for W-2 is a condition of eligibility for RCA.

An RCA assistance group consists of either an applicant or an applicant and his or her spouse. An unmarried refugee 18 years or older forms his or her own RCA group, even if living with other RCA groups.

Minor teen parents and their children form another type of RCA assistance group. This is because parents who are under age 18 are not eligible for W-2. If either parent turns 18 during the RCA eligibility period, determine W-2 eligibility. Remove the group from RCA if the 18-year-old parent is found to be eligible for a W-2 paid placement.

5.4.1 Eligibility Overview

Previous Policy

Minor adjustments to the eligibility overview language were made to the previous policy, in order to reference ORR's eligibility resources, clarify eligibility timelines, and specify the requirement to attend any interviews arranged by a W-2 agency. An irrelevant sentence related to social security numbers was deleted.

Updated Policy

The complete eligibility overview is written as follows:

To be non-financially eligible for RCA, a refugee must:

- 1. Possess a qualifying immigration status, listed below and in accordance with the Office of Refugee Resettlement's (ORR) [Status and Documentation Guide](#);*
- 2. Have had a qualifying status for 12 months or less;*
- 3. Be a resident of Wisconsin;*
- 4. Be ineligible for a W-2 paid placement, and not be receiving Supplemental Security Income (SSI) or Kinship Care;*
- 5. Not have quit a job or refused a job offer or interview arranged by the W-2 agency within the 30 days prior to application;*
- 6. Comply with employment and training requirements;*
- 7. Not be enrolled as a full-time student in higher education; and*
- 8. Not be enrolled in the Matching Grant program.*

5.4.3 Date of Eligibility

Previous Policy

Formerly titled "Date of Entry to the U.S.", this section described relevant details related to determining the date of eligibility for RCA, noting exceptions for whom "date of entry to the U.S." is not the date on which eligibility was conferred.

Updated Policy

In accordance with the new policy, the terms "date of arrival" or "date of entry to the U.S." will no longer be used as they previously were used. Under the new policy, "date of eligibility" refers to the date on which any circumstances which confer eligibility occurred. Those circumstances have not changed and are described in section 5.4.3.

5.4.5 RCA and Eligibility for Other Benefits Programs

Previous Policy

Formerly titled "Ineligibility for W-2 Paid Placement and Non-Receipt of SSI and Kinship Care", this section outlined details about the non-financial eligibility criteria for RCA related to eligibility for other benefits programs. These programs include Supplemental Security Income (SSI) and Kinship Care, which is a TANF-funded program in the State of Wisconsin. The previous policy language can be found below:

When a cash assistance application is received, first determine eligibility for W-2. If the applicant meets W-2 financial eligibility requirements but does not meet nonfinancial eligibility requirements or is not eligible for a paid W-2 placement, determine eligibility for RCA.

If an adult refugee becomes ineligible for W-2 due to a change in circumstances in which there is no longer a dependent child in the household, determine eligibility for RCA for any remainder of the initial twelve-month residence period in the United States.

Refer refugees who are age 65 or older, or who are blind or disabled, for application to [Supplemental Security Income \(SSI\)](#) (see 7.4.3 for guidance about SSI advocacy). Inform these refugees that current federal laws limit SSI eligibility to seven years after arrival unless citizenship is obtained. A refugee is eligible for RCA while an SSI determination is being made and until he or she actually receives an SSI payment. (See 2.2.1.10) If you learn, however, that SSI has been paid for the same month as an RCA payment, attempt to recover the RCA payment.

Refugees who are minors and living with adult caretaker relatives instead of their parents should be referred for application to Kinship Care. A refugee is eligible for RCA while a Kinship Care determination is being made. When Kinship Care begins, RCA eligibility is lost.

Updated Policy

The updated policy clarified some language and provided greater detail about the timelines associated with starting and stopping RCA payments due to receipt of payments from SSI or Kinship Care, as well as the potential application of the exemption policy detailed in section 5.4.7.2. The updated language can be found below:

When a cash assistance application is received, first determine eligibility for W-2. If the applicant is not eligible for W-2, determine eligibility for RCA.

If an adult refugee becomes ineligible for W-2 due to a change in circumstances in which there is no longer a dependent child in the household, determine eligibility for RCA for any remainder of the initial twelve-month residence period in the United States.

Refugees who are age 65 or older, or who are blind or disabled must be referred to [apply for Supplemental Security Income \(SSI\)](#). See Section 7.4.3 of the [W-2 manual](#) for more guidance about SSI advocacy. Inform SSI applicants that current federal laws limit SSI eligibility to seven years after arrival unless citizenship is obtained.

An RCA recipient is eligible for RCA while an SSI determination is being made and until he or she actually receives an SSI payment. Note that an SSI applicant may be exempt according to section 5.4.7.2 of this manual, depending on the circumstances. RCA recipients who are awaiting SSI approval and receipt of payment must inform the W-2 agency within 10 days of receiving a first SSI payment, at which time the FEP must close the RCA case, effective the date on which the first SSI payment was received. Overpayment processes must be initiated for prospective RCA payments made during the month SSI payments began and, in the case of late reporting by RCA recipients of SSI payments, any subsequent months during which payments from both programs were received.

Similarly, refugees who are minors and living with adult caretaker relatives instead of their parents should must be referred for application to [Kinship Care](#), which is funded by TANF (W-2). Eligibility for Kinship Care therefore triggers the non-financial eligibility rule stating that RCA applicants are

not eligible for RCA if they are eligible for TANF (see 5.4.1 of this manual). However, a refugee is eligible for RCA while a Kinship Care determination is being made. RCA recipients must inform the W-2 agency within 10 days of receipt of the first payment Kinship Care payment, at which time the FEP must close the RCA case, effective the date on which the first SSI payment was reportedly received. Overpayment processes must be initiated for prospective RCA payments made during the month Kinship Care payments began and, in the case of late reporting by the RCA recipient of Kinship Care payments, any subsequent months during which payments from both programs were received.

5.4.6 Job Quit or Job/Interview Refusal

Previous Policy

This section was previously titled "Job Quit or Refusal Within 30 Days Prior to Application". It was rewritten for clarity, and incorporated details related to BRP's sanction policy, which is also introduced in this memo. The previous policy text can be found below.

A refugee that has refused to accept an appropriate offer of employment or voluntarily quit appropriate employment in the 30 calendar days prior to filing the RCA application is ineligible for RCA, unless a good cause reason exists. See [18.2.4.6.3](#) for guidelines on determining "appropriate" employment. Contact the refugee's [Volag](#) worker when processing the application to determine if such a refusal or job quit has occurred. A refugee who quit or refused a job within the 30 calendar days prior to application would regain RCA eligibility on the 31st day after such job quit or refusal has taken place.

To determine if a refugee who has quit or refused employment possesses a good cause reason, see [11.2.2](#). W-2 workers must apply good cause policy in a culturally-competent manner.

Updated Policy

The new policy was rewritten for clarity and with greater detail, as follows:

RCA recipients are required to accept appropriate offers of employment and must go to any job interview arranged by the W-2 agency. Therefore, any RCA recipient who has refused to accept an appropriate offer of employment or refused to go to a job interview arranged by the agency may be sanctioned, unless there is a 'good cause' for their refusal.

See 5.4.7.4 of this manual for details related to sanctions. A complete list of good cause reasons can be found in section 11.2.2 of the W-2 manual. Section 5.4.7.3 of this manual outlines the criteria for determining what is appropriate employment.

RCA applicants who have refused to accept an appropriate offer of employment or refused to go to a job interview arranged by the agency within the 30 days prior to applying for RCA are considered ineligible for RCA.

An RCA applicant found initially ineligible for the reasons referenced in this section may be found eligible for RCA after 30 days from the time when a job interview or appropriate offer of employment was refused, if all other eligibility criteria are satisfied. For RCA recipients for whom sanctions were applied due to the reasons referenced in this section, the sanction policy from section 5.4.7.4 must be followed in order to determine when or whether to resume payments.

5.4.7 Employment and Training

Significant changes were made to nearly all of the Employment and Training subsections. Each revised subsection has been detailed below. Also included below is an overview of an additional subsection (5.4.7.5 Family Self-Sufficiency Plan and Employability Plan Requirements), which was not part of the previous Employment and Training policy.

5.4.7.1 Employment and Training Requirements

Previous Policy

The previous policy did not include sufficient detail regarding the definition of an acceptable employment and training service provider, or whether a non-BRP-funded agency may be considered to be an employment and training service provider. Details specific to FSET were eliminated from this section, as FSET is simply one example of an alternative employment and training service provider. A detail not pertinent to employment and training service providers, regarding employers and employment authorization, was eliminated from this section. The previous policy text can be found below:

All adult RCA recipients who enroll in employment and training activities and must participate in such activities within 30 days of receiving RCA benefits. The employment and training requirements used in the RCA program differ from W-2 work participation requirements in that they are designed to meet the needs of newly arrived refugees who typically possess little or no English skills. Participation in the employment and training activities is meant to ensure that RCA clients attain economic self-sufficiency within their twelve-month RCA eligibility period. A refugee has attained economic self-sufficiency when their income allows them to afford basic necessities such as rent, food and transportation.

RCA clients may fulfill their RCA employment and training requirement by participating in the FoodShare Employment and Training (FSET) program (if they are FSET-eligible) or a specialized refugee employment and training program.

Employment and training service agencies must work with RCA recipients to develop individual Employability Plan (EP) (see 6.1 and 6.2) that fit into a Family self-sufficiency plan, where applicable. These plans must specify clear employment objectives and concrete steps needed to obtain the clients' goal. Individual Employability Plan (EP)s must be updated at least once every 6 months (see 6.2.2) and must address concurrent language training needs and employment services needs of the individual and/or couple.

Refugee employment and training services may include but are not limited to:

- 1. Employment services including world-of-work and job orientation, job clubs, job workshops, job development, referral to job opportunities, job search, job placement and follow-up;*
- 2. Employability services, including interest, aptitude and skills testing;*
- 3. English as a Second Language (ESL) and/or Vocational English as a Second Language (VESL) courses;*
- 4. Vocational training;*
- 5. Skills recertification (see 18.2.4.7);*
- 6. Subsidized employment;*

7. Work experience; and
8. Assistance in obtaining Employment Authorization Documents (EADS) (SIC)

Note: All employers are required by law to ensure that their employees are eligible to work in the U.S. Individuals who are granted immigration status as refugees are authorized to work indefinitely in the U.S. Refugees can fulfill the employer requirement by showing their I-94 form (with an unexpired refugee admission stamp) for a temporary period of time while they work towards obtaining permanent work authorization, by showing their Employment Authorization Document (EAD) or, if they have been in the U.S. for at least one year, a permanent resident card.

RCA eligibility workers must track recipients' participation in their required employment and training activities.

Updated Policy

This section was rewritten to provide more clarity on employment and training service providers and the requirements related to assigning activities. This includes a reference to a new policy requiring Eligibility Reviews, which provides detailed and specific instructions for verifying RCA recipients' participation in assigned activities, and can be found in section 5.6.1. The full, rewritten text can be found below:

All adult RCA recipients who are not exempt according to section 5.4.7.2 must be enrolled in services at an agency providing employment services and must participate in those services within 30 days of receipt of RCA. If there is an RSS Employment and Employability (RSS-E&E) service provider in the area, the individual should be referred to RSS-E&E. If the RCA recipient prefers an alternative agency providing similar employment-related services, the FEP must document this alternative referral and explain in detail the reason for the non-RSS-E&E referral. For any referrals, whether to an RSS-E&E agency or not, the form DCF 13768 Refugee Cash Assistance Work Programs- Notice of Referral ([DCF Forms Search](#)) must be completed, issued to the client, and a copy must be retained. For any referrals to non-BRP-funded agencies, the form DCF-F-5632 Confidential Information Release and Discussion Authorization ([DCF forms search](#)) must be completed, issued to the client, and a copy must be retained.

If there is no RSS-E&E provider in the area, the FEP must determine where the individual should be referred in order to ensure they will be assisted in becoming employed. The type of services offered by that agency must be described and the steps taken to make the referral must be documented. For any referrals to non-BRP-funded agencies, the form DCF-F-5632 Confidential Information Release and Discussion Authorization ([DCF forms search](#)) must be completed, issued to the client, and a copy must be retained.

Regardless of their exemption status, all adult RCA recipients must also complete the form DCF-F-5765 RCA Rules, Rights and Responsibilities Agreement ([DCF forms search](#)) during their initial enrollment appointment, as described in 5.2.3 of this manual. Completing DCF-F-5765 form includes assigning employment-related activities.

The requirements for verifying participation in the activities assigned in the form DCF-F-5765 RCA Rules, Rights and Responsibilities Agreement are fully satisfied by completing form DCF-F-5764 Refugee Cash Assistance Eligibility Reviews and following the policy pertaining to eligibility verification, outlined in section 5.6.1 of this manual.

5.4.7.2 Exemptions

Previous Policy

The previous policy regarding exemptions provided minimal detail and did not sufficiently define exemptions. The section was rewritten, and the previous language can be found below:

No adult is exempt from the employment and training requirement, but all activities in the individual's employability plan (EP) must be appropriate for the individual and consistent with his or her needs and abilities.

Updated Policy

The exemption policy was rewritten in order to provide greater detail and clarity. The full rewritten text can be found below:

To be exempt means the recipient is not required to fulfill the conditions described in 5.4.6 and 5.4.7.1. The following circumstances may justify an exemption for RCA recipients:

- *Pregnancy (note that upon the birth of the child, the case must apply for W-2)*
- *Decision pending for SSI or SSDI*
- *Lack of work authorization*

Note that having an "exempt" status automatically results in a W-2 T placement, as described in section 5.2.4 of this manual.

For any of the exemption reasons listed above, RCA recipients are expected to report any information that would represent a change to their status of "exempt" within the required timeframes, as stated on the form DCF-F-5765 Rules, Rights and Responsibilities Agreement. If it is discovered during Eligibility Reviews, detailed in Section 5.6.1 of this manual, that changes related to exemptions were not reported timely, overpayment procedures shall be applied. Verification documents for reasons for changes to exemptions must be provided in accordance with verification policy referenced in section 5.6.1 of this manual.

Note that there may be circumstances introduced by Office of Refugee Resettlement Policy Letters which could justify an expanded use of this exemption policy. Such instances would be announced in a BRP Operations Memo.

5.4.7.4 Sanctions

Previous Policy

This section was previously titled "Refusal to Comply and Sanctions in the RCA Program". The previous policy was rewritten due to its impracticability and lack of clarity. The previous text read as follows:

RCA participants must participate in all assigned work training activities or education and training activities outlined in the employability plan. If an RCA participant cannot participate in an assigned activity, the agency must encourage the participant to call their caseworker prior to the activity time. A participant has 7 working days after an absence from an assigned RCA

employment and training activity to notify his or her worker of the reason for the absence. The worker can then determine whether the reason meets one of the good cause reasons.

If a refugee fails to meet employment and training requirements and good cause (see 11.2.2) is not found, sanction the individual. A sanction is defined as a stoppage of RCA payments for a set period of time due to client noncooperation. Apply the first sanction for a three-month period. If the same individual again fails to meet employment and training requirements, apply the sanction for six months.

If the RCA assistance group contains an individual other than the sanctioned client, RCA payments may continue if that other individual is not also being sanctioned.

Updated Policy

This section was rewritten in order to provide more detailed and clear instructions pertaining to sanctions and make more options available to administrators of the RCA program. The full rewritten text can be found below:

In the RCA program, various levels of sanctioning are allowed, which considers various levels of compliance with program requirements. Applying sanctions is temporary because the reasons for applying the sanctions may change. The following is a list of reasons a FEP may decide to apply sanctions:

- *Non-participation in Employment and Training activities*
- *Refusal of reasonable offer of employment*
- *Refusal to attend interview for reasonable employment arranged by FEP*

There are two different levels of sanctioning that may be applied to RCA recipients:

- *Partial Sanction due to Partial Compliance (\$490)*
- *Full Sanction due to Full Non-Compliance (\$0)*

Sanctioning may be applied at any time while the case is open, beginning on the 30th day from the RCA enrollment appointment. The FEP is responsible for determining whether there is cause to sanction due to partial or full non-compliance; however, the only time the FEP is required to gather information about compliance is during the 30-day follow-up and the Six-Month Eligibility Review. If non-compliance is discovered for some reason outside of those two appointments, the FEP may still apply a sanction. Some examples of how non-compliance may be discovered include viewing information related to compliance documented in CWW, speaking with a knowledgeable staff person at the employment and training agency to which the RCA recipient was referred, or speaking with the RCA recipient during the 30-day follow-up or the Six-Month Eligibility Review.

The means used to determine compliance must be documented, and any pertinent verification item (such as an email) must be uploaded into ECF.

Partial or full sanctions are applied for three months at a time. Sanctions are applied by completing the form DCF-F-DETM 13770, titled Refugee Cash Assistance Sanctions- Notice of Decision, and mailing it to the RCA recipient within five working days of the discovery of non-compliance. This and all DCF forms can be found on the DCF Forms Website

(<https://dcf.wisconsin.gov/forms>). A copy of the completed form must be uploaded into ECF within 10 days of its completion.

Sanctions are first applied to the payment month following the discovery of non-compliance. As stated above, the sanctions form (Form 13770) must be completed and mailed to the RCA recipient within five working days of the discovery of non-compliance, while the reduced payment (if applicable) must be mailed according to the agency's regular payment schedule. Depending on when during the month the non-compliance is discovered, it is acceptable to mail a reduced payment along with Form 13770.

If the FEP determines that the reason for the sanction has not been resolved by the end of the three months indicated on Form 13770, the FEP may decide to apply another three months of sanctioning. For each instance of sanctions being applied, a form 13770 must be completed and sent to the RCA recipient, in alignment with the usual RCA payment schedule (i.e., form 13770 is sent with the reduced payment, or at the same time a payment would normally have been sent). If the FEP determines that the reason for the sanction has been resolved, then regular RCA payments may continue in the month immediately following the time period indicated on the most recent Form 13770.

Making a sanction decision or determining that the reason for a sanction has been resolved is entirely the responsibility of the FEP, and is based on available information. The bulleted examples below are intended as guiding principles for determining compliance, partial compliance, and full non-compliance:

- *Compliance: During their Six-Month Eligibility Review, an RCA recipient reports regularly attending English class, assigned in their Rights and Responsibilities Agreement, at their local resettlement agency.*
- *Partial Compliance: During their Six-Month Eligibility Review, an RCA recipient reports having been offered a job at a hotel, but not accepting it due to their lack of interest in working there.*
- *Partial Compliance: During their 30-Day Eligibility Review, an RCA recipient reports having attended one job training workshop, assigned in their Rights and Responsibilities Agreement, but does not intend or desire to return.*
- *Full Non-Compliance: An RCA recipient does not attend their scheduled Six-Month Eligibility Review, and the FEP calls the resettlement agency where English classes are offered, as assigned in their Rights and Responsibilities Agreement. The resettlement agency reports that the RCA recipient has never attended class.*

Similarly, the FEP may determine whether the reason for the sanction has been resolved, based on additional information provided upon contact made with or about the RCA recipient, such as increased attendance at English classes, reported by the RCA recipient or staff at the English provider, etc. RCA recipients do not need to reapply for RCA upon resolution of a sanction. As with any disagreement between the RCA recipient and the agency about the agency's action, the RCA recipient may dispute a reduced or stopped payment and attempt to reach an agreement. If no agreement is reached, they may follow the Fair Hearing procedure described in section 5.7 of this manual.

If the RCA assistance group contains an individual other than the sanctioned client, RCA payments may continue if that other individual is not also being sanctioned.

5.4.7.5 Family Self-Sufficiency Plan (FSSP) and Employability Plan (EP) Requirements

This is a new section. There have been minor deletions from other subsections, which referenced the FSSP and/or EP but did not provide sufficient detail. Any necessary details that were deleted in other sections have been rewritten into this new section, but with more clarity. The entire text of this new section is as follows:

The completion of a Family Self-Sufficiency Plan (FSSP), one component of which is an employment-specific goal-setting component called an Employability Plan (EP), is a requirement of multiple ORR programs, including RCA. Therefore, agencies administering the RCA program must adhere to the requirements detailed below, according to the individual circumstances of each RCA recipient.

Section 2.1.2 and 2.12.2 of this manual pertain to pertinent FSSP requirements of other ORR-funded programs (RCDS and RSS E&E) and apply to this section as well. In both sections, the manual lists the following as a required service of each program: "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." The RCA FEP must therefore determine whether the RCA recipient is co-enrolled in either RCDS and/or RSS E&E, and if so, must request a copy of the FSSP (one component of which is the EP), which may be electronically delivered using a secure delivery method.

The RCA FEP must acknowledge either the completion or receipt of an FSSP (one component of which is the EP) on the form DCF-F-5765 Rules, Rights and Responsibilities Agreement, before assigning EP-aligned activities on that form.

5.5.3 115% Gross Income Test

The previous policy did not include specific, up to date information about income disregards, but instead named one type of income to be disregarded in a previous section. This reference was deleted and the updated policy includes a more comprehensive resource for determining disregarded income, as well as references to newly established sources of income that must be disregarded. Both previous and updated text is provided below:

Previous Policy

At application, the RCA assistance group must have total countable income that is less than or equal to 115% of the Federal Poverty Limit (FPL) for the size of the RCA assistance group.

The FPL changes in February of each year. See section 3.2.1 of the [W-2 manual](#) for current FPL amounts.

Updated Policy

At application, the RCA assistance group must have total countable income that is less than or equal to 115% of the Federal Poverty Limit (FPL) for the size of the RCA assistance group.

The FPL changes in February of each year. See section 3.2.1 of the [W-2 manual](#) for current FPL amounts.

Certain income must be disregarded when counting income and assets. In addition to disregarded income listed in the W-2 manual in section 3.2.9, when completing the RCA Gross Income Test, any Welcome Corps funds granted to the RCA recipient, up to the current amount of per capita Reception and Placement (R&P) funds from the Department of State, must be disregarded. Information about current per capita amounts of R&P funding can be found at <https://www.state.gov/funding-opportunities/funding-opportunity-announcements/>.

5.5.9.1 Grace Period Early Employment Incentive

The previous policy did not account for multiple job-related changes as it may apply to the Grace Period. Furthermore, it changes the date on which the 30-day grace period clock begins from when the individual entered employment to when the income became available to the RCA recipient. The updated policy provides additional clarity, which is reflected in the language below:

Previous Policy

If earned income renders an assistance group ineligible for RCA before the 1st of the month prior to the final month of eligibility, then the grace period policy shall be applied. The grace period will give FEPs sufficient time to make an income availability determination and properly reduce or terminate cash benefits.

Updated Policy

If earned income renders an assistance group ineligible for RCA before the 1st of the month prior to the final month of eligibility, then the grace period policy shall be applied. The grace period will give FEPs sufficient time to make an income availability determination and properly reduce or terminate cash benefits.

With consideration to the fact that an individual may have more than one job-related change in income during the RCA eligibility period, FEPs may apply the grace period policy to each RCA assistance group up to two times. If the first grace period payment was due to a part-time job entry and resulted in a prorated CSJ placement, then the second grace period payment must be calculated based on the prorated CSJ payment amount.

Terminating RCA:

If an individual reports that they obtained employment during the previous month and they are no longer financially eligible for RCA, then a 30-day grace period clock will begin on the date on which the income became available to the RCA recipient. One final payment will be issued for the upcoming month, which will be a partial payment accounting for the remaining days of the 30-day grace period, the first day of which is the day the income became available to the RCA recipient. Example 1 illustrates how the grace period policy should be applied in the instance that the individual is no longer financially eligible for RCA.

5.5.10 Counting Income

Additional details were added to this section pertaining to Welcome Corps. The previous and updated policy language can be found below:

Previous Policy

All earned and unearned income of all RCA assistance group members is counted in determining the 115% gross income test, unless specifically disregarded.

Updated Policy

All earned and unearned income of all RCA assistance group members is counted in determining the 115% gross income test, unless specifically disregarded.

Certain income must be disregarded when counting income and assets. In addition to disregarded income listed in the W-2 manual in section 3.2.9, when completing the RCA Gross Income Test, any Welcome Corps funds granted to the RCA recipient, up to the current amount of per capita Reception and Placement (R&P) funds from the Department of State, must be disregarded. Information about current per capita amounts of R&P funding can be found at <https://www.state.gov/funding-opportunities/funding-opportunity-announcements/>.

5.5.11 Disregarded Income

Additional details were added to this section pertaining to Welcome Corps. The previous and updated policy language can be found below:

Previous Policy

All earned and unearned income of all RCA members is counted in determining the 115% gross income test, with the exception of the income listed in section 3.2.9.1 of the W-2 manual. Note in particular that State Department Refugee Resettlement Reception and Placement (R&P) assistance payments are disregarded.

Updated Policy

All earned and unearned income of all RCA members is counted in determining the 115% gross income test, with the exception of the income listed in section 3.2.9.1 of the [W-2 manual](#), and Welcome Corps funds granted to the RCA recipient, up to the current amount of per capita Reception and Placement (R&P) funds from the Department of State. Information about current per capita amounts of R&P funding can be found at <https://www.state.gov/funding-opportunities/funding-opportunity-announcements/>.

5.6.1 RCA Eligibility Verification Requirements

This section introduces a new policy by which a specific number of Eligibility Reviews are required to be completed by the agency. Those changes and others are highlighted beginning with the introduction below, and in greater detail in a later section (5.6.7). The previous and updated language from the introduction can be found below:

Previous Policy

The [W-2](#) agency must verify financial and nonfinancial information provided by the members of the [RCA assistance group](#) to determine whether the group qualifies for or remains eligible for RCA.

Updated Policy

The W-2 agency FEP must verify financial and nonfinancial eligibility information provided by the members of the RCA assistance group initially, and at 30-day and 6-month Eligibility Reviews. They must do this by completing form DCF-F-5764 RCA Eligibility Reviews and uploading it into ECF, in order to determine, based on the best available evidence, whether the group qualifies for or remains eligible for RCA. Note that if the RCA recipient does not attend either or both of these scheduled reviews (whether in person or on the phone), the worker must determine eligibility without the input of the RCA recipient. The result of any such review, including a review attended by the RCA recipient, may be a discovery of non-compliance and a sanction. The worker may consult partner agencies, CARES/CWW, or another worker at the agency, in order to use the best available evidence to determine the ongoing eligibility status of the RCA recipient.

See section 5.6.7 for complete details regarding 30-day and 6-month Eligibility Review requirements.

5.6.1.2 Requesting Verification from RCA Participants

This section provides clarification with the intent of avoiding confusion related to program requirements that may be caused by using shared statewide systems. The previous and updated language can be found below:

Previous Policy

Whenever possible, the FEP should attempt to verify eligibility information via CARES, data exchange and ECF.

Updated Policy

Whenever possible, the FEP should attempt to verify eligibility information via CARES, data exchange and ECF. For information that requires a verification item (such as an immigration document verifying an eligible status), this means verifying that the required item has been uploaded into ECF, rather than ever assuming it has been due to the RCA applicant's enrollment in other programs.

5.6.7 Reviews

In this section, the Eligibility Review policy introduced in section 5.6.1 is fully detailed. The previous policy, which indicated that there is no required review, and the updated policy can be found below.

Previous Policy

Due to RCA's short eligibility period there is no required review, but eligibility should be reviewed whenever a participant is scheduled for a regular review of any other benefits administered by the W-2 agency.

Updated Policy

In addition to verifying initial eligibility, agency FEPs are required to schedule and complete two additional Eligibility Reviews, at 30 days and six months post-enrollment. Completion of both reviews must be done using [DCF-F-5764 RCA Eligibility Reviews], which is for internal use only, and must be uploaded into ECF within 10 working days of completion. The occurrence of each Eligibility Review must be documented in case comments, including any follow-up to a “No” response in the Eligibility Review section of the form.

The 30-day Eligibility Review must take place 28-35 calendar days after the initial enrollment appointment. The Six-month Eligibility Review must take place no more than six months after the initial enrollment appointment.

Both Eligibility Reviews must be scheduled with the RCA recipient and may take place in person or over the phone; however, if the RCA recipient does not attend and participate in either or both Eligibility Reviews, the FEP must conduct the Eligibility Review without the input of the RCA recipient, using the best available evidence to determine their ongoing eligibility status. If the FEP’s determination results in a sanction, as described in section 5.4.7.4 of this manual, the RCA recipient has a right to appeal the agency decision, as described in Section 5.7 of this manual.

5.6.8 Required RCA Forms

Formerly titled “Requirements for RCA Notices”, this list has been updated to reflect revised and newly introduced forms, and to provide a more organized format by putting the information into a table. The title was revised in order to clearly call attention to the list as an organizational tool for RCA administrators. The previous and updated language can be found below:

Previous Policy

In order to comply with federal RCA policy regarding notices, refer to the following requirements:

- *The client must sign the DCF Form 15011 (RCA Participation Agreement), which communicates RCA time limits, employment and training requirements, consequences of nonparticipation, and client rights ([DCF Forms Search](#)).*
- *Use DCF Form 13753 (RCA Eligibility Notice of Decision) to inform an applicant that he or she is eligible for RCA ([DCF Forms Search](#)).*
- *Use the DCF Form 13758 (RCA Ineligibility Notice of Decision) to inform an applicant that he or she is ineligible for RCA ([DCF Forms Search](#)).*
- *A notice of RCA termination must be provided at least 10 days prior to the termination date. Remember that a W-2 determination must be made when RCA is terminated due to time expiration.*
- *Use the DCF Form 13770 (RCA Sanctions Notice of Decision) to inform a client that a sanction is being imposed on his or her RCA case ([DCF Forms Search](#)). See section 5.4.7.4 of this manual for more details.*
- *Use the DCF Form 13768 (RCA Work Programs Notice of Referral) inform clients of referrals to work Employment and Training programs. See section 5.4.7.1 of this manual for more details.*
- *Use the Form Template 15725 (Sample RCA Overpayment Notice) to notify an RCA client of an overpayment and the DCF Form 15721 (RCA Repayment Agreement) to record an RCA repayment agreement between the client and the agency ([DCF Forms Search](#)).*

The forms listed above are available in English and several refugee languages common in Wisconsin and can all be found on the [DCF Forms Search page](#). If a form is not available in an appropriate language for a refugee client, another acceptable means of communication must be used, such as verbal translation into the refugee's native language.

Updated Policy

In order to comply with federal RCA policy regarding notices, refer to the following requirements:

Form Title (DCF Forms Search)	Purpose	Required timeframe for completion and upload
<i>DCF-F-14880 W-2 and Related Programs Registration</i>	<i>To apply for RCA</i>	<i>To be completed by RCA recipient or their representative</i>
<i>DCF-F-2471 W-2 and Related Programs Application</i>	<i>To document that W-2 program eligibility has been tested</i>	<i>To be completed manually when online systems are not available, uploaded within 5 days of completion</i>
<i>DCF-F-5765-Rights and Responsibilities Agreement</i>	<i>To inform RCA recipient of their rights and responsibilities while receiving RCA</i>	<i>To be completed during initial eligibility, uploaded within 10 days of completion, copy given to RCA recipient</i>
<i>DCF-F-13753 RCA Eligibility Notice of Decision</i>	<i>To inform RCA recipients when/why they have been found eligible for RCA</i>	<i>Issued to client at initial eligibility appointment or mailed within five days</i>
<i>DCF-F-13758 RCA Ineligibility Notice of Decision</i>	<i>To inform RCA recipients when/why they have been found ineligible for RCA</i>	<i>Issued to client at initial eligibility appointment or mailed within five days</i>
<i>DCF-F-13770 RCA Sanctions Notice of Decision</i>	<i>To inform RCA recipients the reasons for and conditions of a sanction decision</i>	<i>Completed and mailed to the RCA recipient within five working days of the discovery of non-compliance</i>
<i>DCF-F-13768 RCA Work Programs Notice of Referral</i>	<i>To inform RCA recipients of referrals to work programs (must match assigned activities on Rights & Responsibilities form)</i>	<i>Completed as needed when other referrals have not already been made, such as established service provision at a Resettlement Agency</i>
<i>DCF-F-15725 Sample RCA Overpayment Notice</i>	<i>To inform RCA recipients of the occurrence and circumstances of an overpayment</i>	<i>Completed and mailed to the RCA recipient within five working days of the discovery of the overpayment</i>
<i>DCF-F-15721 RCA Repayment Agreement</i>	<i>To inform RCA recipients of the repayment expectations associated with an overpayment</i>	<i>Completed and mailed to the RCA recipient within five working days of the discovery of the overpayment</i>
<i>DCF-F-13767 RCA Termination- Notice of Decision</i>	<i>To inform RCA recipients of the occurrence and circumstances of a case closure</i>	<i>Completed and mailed to the RCA recipient within five working days of the decision</i>
<i>DCF-F-5764 RCA Eligibility</i>	<i>To verify ongoing eligibility on</i>	<i>To be completed during initial</i>

Reviews	a prescribed schedule	eligibility; uploaded within 10 days of completion; copy given to RCA recipient
---------	-----------------------	---

The forms listed above are available in English and several refugee languages common in Wisconsin and can all be found on the [DCF Forms Search page](#). If a form is not available in an appropriate language for a refugee client, another acceptable means of communication must be used, such as verbal translation into the refugee's native language.

5.6.9 Payment Issuance and Reimbursement

The final paragraph of this section was deleted and the revised placement details outlined in section 5.2.4, as they relate to payment amounts, were referenced instead. The previous and updated text can be found below:

Previous Policy

Since [CARES](#) is not programmed to support the RCA program, W-2 agencies must issue RCA payments manually. The initial RCA payment must be made within five days of the eligibility determination (see [18.2.2.5](#)) and each payment thereafter must be made by the first of the month. Refer to [18.2.4.2](#) for guidance on pro-rating RCA payments.

W-2 agencies are reimbursed for the RCA payments and related administrative costs separate from their W-2 contract allocation. W-2 agencies must utilize the System for Payments and Reports of Contracts (SPARC) to submit RCA expenses to [DCF](#). SPARC instructions, account information, and reports can be found on the [SPARC](#) webpage.

RCA clients can be placed into either subsidized employment (in accordance with the rules governing W-2 Trial Employment Match Program (TEMP)) (see [7.3.0](#)), Community Service Jobs (CSJ) (see [7.4.1](#)), or W-2 Transitions (W-2 T (see [7.4.2](#))) (see [18.2.2.4](#)). RCA payment amounts are consistent with W-2 payment amounts for these placements (see [10.1](#))

Updated Policy

Since [CARES](#) is not programmed to support the RCA program, W-2 agencies must issue RCA payments manually. The initial RCA payment must be made within five days of the eligibility determination and each payment thereafter must be made by the first of the month. Refer to section 5.4.3 of this manual for guidance on pro-rating RCA payments.

W-2 agencies are reimbursed for the RCA payments and related administrative costs separate from their W-2 contract allocation. W-2 agencies must utilize the System for Payments and Reports of Contracts (SPARC) to submit RCA expenses to [DCF](#). SPARC instructions, account information, and reports can be found on the [SPARC](#) webpage.

RCA payment amounts must align with RCA placement decisions, as outlined in section 5.2.4 of this manual.

5.6.11 RCA Case Transfers

This is a new section; the new text can be found below:

New Policy

For RCA recipients who move from one location within Wisconsin to another location within Wisconsin, RCA administrators must follow the W-2 relocation policies found in section 4.6.1 of the [W-2 Manual](#). The month during which the need for the transfer is discovered, whether due to the RCA recipient reporting the change or otherwise, must be the last month during which the RCA payment was made by the outgoing agency, while the incoming agency must determine and issue the following month's RCA payment during the course of carrying out the transfer described in section 4.6.1 of the W-2 manual.

5.6.12 RCA Case Closures

This is a new section; the new text can be found below:

New Policy

Each RCA case must be officially closed by issuing form DCF-F-13767 RCA Termination Notice of Decision ([DCF Forms Search](#)) within five working days of determining that the case has closed.

SYSTEMS OR FORMS IMPACTS

As part of the above described policy changes, the following forms have been impacted in the ways described in the table below, and must be used beginning on October 29, 2024:

Form Number and Title:	New or Revised?	Additional Notes:
DCF-F-DETM 13753-E Refugee Cash Assistance (RCA) Rules, Rights and Responsibilities Agreement	New	This form renders the form DCF-15011 Participation Agreement obsolete as of the publication date of this memo. This new form must now be used in its place.
DCF-F-5764-E Refugee Cash Assistance (RCA) - Eligibility Reviews	New	This new form must be used as instructed as of the publication date of this memo.
DCF-F-DETM13770-RCA Sanctions	Revised	The revised version of this form must be used as of the publication date of this memo.
DCF-F-DETM13767-RCA/RMA Termination	Revised	The revised version of this form must be used as of the publication date of this memo.

REPORTING IMPACTS

N/A

TRAINING

There will be numerous technical assistance opportunities offered by sub-topic, which will be announced as they are offered.

AGENCY ACTION

W-2 agencies must discuss the policy changes and updated forms with staff. W-2 agencies must also update any relevant internal agency procedures accordingly.

CONTACTS

Questions regarding this memo should be directed to DCFRefugee@wisconsin.gov .

ATTACHMENTS:

N/A

DCF/DFES/BRP/RPPS/RD