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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.

Chapters 1, 2 and 3 pertain to the Refugee Support Services (RSS) program. Chapter 4 contains resources that help service providers define and identify services. Chapter 5 contains guidance for administering the Refugee Cash Assistance (RCA) program, and Chapter 6 contains guidance for administering the Refugee Medical Assistance (RMA) program.

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 Guidance, and federal regulations described in 45 CFR § 400 in the implementation of any of the 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, contact DCFRefugee@wisconsin.gov and ask to be added to the email notifications list. Note that significant updates will often be communicated using Operations Memos, while minor/technical updates may be communicated using Cover Sheets. All such communications can be found on the Policy page of the BRP Website.

1.1 REFUGEE SUPPORT SERVICES

This section describes Refugee Support Services (RSS). The purpose of RSS is primarily for employability services designed to enable refugees to obtain jobs in order to achieve economic self-sufficiency as soon as possible. Services may continue to be provided after a refugee has entered a job to help the refugee retain employment or move to a better job. Services may not be used for long-term training programs such as vocational training that last for more than a year, or educational programs that are not intended to lead to employment within a year.

Despite the strong emphasis on employment, RSS must be delivered with a "whole family approach". Therefore, the services outlined in 45 CFR § 400.154 are referred to in Section 2.0 of this manual as Primary Services, while the services outlined in 45 CFR § 400.155 are also available and referred to in Section 2.0 as Whole Family Services.

Given that RSS is primarily for services designed to enable refugees to obtain jobs, an important step during intake is to ask whether at least one member of a household is seeking employment and in need of Primary Services. This information will be used to monitor and gauge the overall service needs at each agency and among the refugee community.

A complete list of Primary and Whole Family Services can be found in section 2.0 of this manual.

1.2 ELIGIBILITY

This section outlines the eligibility rules for the RSS program.

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The Sub-recipient is required to ensure that anyone enrolled in RSS is eligible to receive such 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.

1.2.1 Immigrant Status

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. Refugees admitted under §207 of the INA;
2. Asylees whose status was granted under §208 of the INA;
3. Cuban and Haitian entrants, in accordance with the requirements in 45 CFR § 401.2;
4. 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 9th 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));
5. 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);
6. Certain Iraqi and Afghan Special Immigrant Visa holders (SIV) pursuant to the Defense Authorization Act for Fiscal Year 2008, Public Law 110-181;
7. Afghan Special Immigrant Parolees as described in ORR Policy Letter 22-01 and ORR Policy Letter 22-02;
8. Eligible Ukrainian Parolees as described in ORR Policy Letter 22-13; and,
9. Lawful permanent residents who *previously held any one of the statuses* identified above.

1.2.2 Time-Limited Eligibility:

Eligibility for all services is for 60 months (five years) following the date an eligible immigrant status was granted, with a few exceptions noted below. 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.

After a recipient's 60-months of eligibility has passed, they may remain eligible for certain limited services, called "Post-enrollment Services." These services include case management (referral), interpretation (not translation), and citizenship preparation or application assistance, which must be reported as Post-enrollment Services in the Wisconsin Refugee Programs Database (WRPD). The 60-

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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. Such waivers would be announced in a BRP Operations Memo.

1.2.3 Other Eligibility Limitations:

1.2.3.1 Age:

1. The services found in 45 CFR § 400.154 and listed in Section 2.0 (called Primary Services) of this manual 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. The services found in 45 CFR § 400.155 do not have a minimum age requirement and may be provided to refugees regardless of age.
2. The following services may be provided beyond an individual's 60-month eligibility time limit, as noted in section 2.0: citizenship and naturalization preparation services, case management (i.e. referral), and interpretation.

1.3 PRIORITIZATION OF SERVICES

This section describes how eligible individuals must be prioritized for all services. Demand for services may be higher than what the Sub-recipient can provide at the level of funding designated. Therefore, Sub-recipients must prioritize serving participants according to the order stipulated below.

1. All programs must assess anyone who requests services for eligibility and, to the extent reasonably possible, must refer anyone who falls outside of prioritized services or agency capacity. When waivers of service prioritization are in effect, which would be announced via a BRP operations memo, certain circumstances related to capacity and need may justify a delay in service provision. In all other cases, in accordance with 45 CFR § 400.147, Sub-recipients must provide services in the order of priority listed below, except in certain individual extreme circumstances. All newly arriving refugees during their first year in the U.S., who apply for services;
2. Refugees who are receiving cash assistance;
3. Unemployed refugees who are not receiving cash assistance; and
4. Employed refugees in need of services to retain employment or to attain economic independence.

Note that this guidance concerning prioritization of services is intended to be followed in the context of having already established, as described above, that the primary purpose of the RSS program is primarily to offer employability services designed to enable refugees to obtain jobs in order to achieve economic self-sufficiency as soon as possible.

To reiterate, RSS funding must be primarily used for Primary Services, pursuant to § 400.154. An agency **may also use its funds for Whole Family Services (WFS)**, pursuant to § 400.155. These service categories are introduced in section 1.1 and further detailed in section 2.0 of this manual. During enrollment, agencies must first ask recipients if they or anyone in their family will require employment or employability services. BRP acknowledges that WFS often inherently support a recipient's goal of economic self-sufficiency, and thus will not limit the provision of such services in most cases.

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2.0 RSS REQUIREMENTS

This section describes the services that may or must be provided to individuals enrolled in the RSS program.

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 qualifies as an allowable service, the Sub-recipient must contact their designated BRP contact for clarification.

All services described in this manual must be documented in the Wisconsin Refugee Programs Database (WRPD) by the Sub-recipient. Prior to the documentation of services, refugees must be enrolled in RSS in WRPD. As described in section 1.1 of this manual, part of the enrollment process includes gathering information about each individual or family's need for employment-related services (called Primary Services).

If a refugee is already enrolled in RSS 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 be supported by verification documents as outlined in section 3.2.4 of this manual. For all enrolled individuals, 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 BRP-funded programs. This form and all DCF forms can be found on the DCF Forms Website (https://dcf.wisconsin.gov/forms).

Participants will be automatically exited from program enrollment in WRPD as follows, according to the following circumstances:

1. Exit due to no services recorded in WRPD for 215 days
2. Exit due to an individual's eligibility period end (e.g. 60 months)
3. As announced by BRP for unusual circumstances such as broad program cancellation

Certain participants who are automatically exited from program enrollment due to reaching the end of their eligibility period will still be eligible to receive services from a small selection of "post-enrollment services" if they are otherwise eligible for such services according to eligibility criteria. Those services (Citizenship Assistance, Interpretation, Case Management) must be reported as "post-enrollment services".

In addition to the Primary and Whole Family Services listed in this section, the Sub-recipient must assure coordination by maintaining collaborative partnerships with other refugee services providers and making referrals as appropriate to maintain quality services. 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.

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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.

The Sub-recipient must ensure joint employment and employability planning with other local RSS 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 TANF agencies (in Wisconsin referred to as Wisconsin Works, or W-2), mutual assistance associations, Resettlement Agencies (RAs), schools, public health agencies, English as a Second Language/English Language Instruction (ESL/ELI) providers, and other community-based organizations.

2.1 PRIMARY SERVICES

Primary Services are Employment and Employability Services listed under § 400.154. An agency **must primarily use its funds for Primary Services**, pursuant to § 400.146. These funds are designed to enable refugees to obtain jobs within one year of becoming enrolled in services, to achieve economic self-sufficiency as soon as possible. Primary Services are listed below and further defined in Chapter 4.0 of this manual. Any services related directly or indirectly to seeking, retaining or improving a participant's employment must be reported as one of the following Primary Services, and a **Family Self Sufficiency Plan (FSSP) must be completed in WRPD** for that individual and any of their family members.

Employment services, including:

- Create Employability Plan (EP)/FSSP
- Employment Orientation Workshop
- Job Development, Job Search, Referral to Job Opportunity
- Job Placement Support
- Job Follow-Up
- EP/FSSP Follow up
- Employability assessment
- On-the-job training
- English language instruction
- Vocational training
- Skills recertification
- Day care for children
- Transportation
- Translation and interpreter services

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- Case management (referral)
- Assistance obtaining Employment Authorization Documents (EADs)

2.2 WHOLE FAMILY SERVICES

Whole Family Services are Other Services found under § 400.155. These are services that are **not directly or indirectly related to seeking, retaining, or improving a participant's employment**. An agency **may use its funds for Whole Family Services**, pursuant to § 400.155, if the Whole Family Service supports the achievement of economic self-sufficiency for the family. Those services are listed below and further defined in Chapter 4.0 of this manual.

Information and referral

Outreach

Social adjustment, including:

Emergency services

Health-related services

Home management services

Day care for children

Transportation

Translation and interpreter services

Case management

Any additional service approved by BRP

Citizenship and naturalization preparation services

2.1.2 Required Activities and Services

The Sub-recipient must deliver all the following services to all refugees enrolled in Primary Services (section 2.1.1), unless otherwise exempted by BRP:

1. Develop a Family Self-Sufficiency Plan (FSSP) in WRPD for all enrolled refugees and their family members who live in the same household; and develop an individual 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 by another agency, the Sub-recipient must coordinate with the agency that created the FSSP to make updates as needed. In other words, an agency who enrolls a client in RSS that does not already have an FSSP in WRPD must write and manage an FSSP for that client. Any later dual enrollments must not establish a new FSSP, but rather the first enrolling agency must continue to own and manage that FSSP, while additional agencies may coordinate with the first 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;

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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. On an ongoing basis, confirm and report whether/when participants become employed;
4. Maintain regular contact with participants, and complete follow-up assessments at six and twelve months from the date of enrollment. 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. This includes the completion of follow-ups for those individuals for whom time-limited eligibility has expired since the initial establishment of the FSSP. For such individuals, follow-ups must still be completed to the best of the agency's ability, even though eligibility has expired;
5. 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;
6. Ensure all refugees who receive RCA are provided with employment and training services that fulfill their RCA participation requirements in order to remain eligible for RCA benefits;
7. 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;
8. Confirm whether participants are employed 90 calendar days after they enter a job;
9. 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
10. Administer participant satisfaction surveys to a random sample of at least 20% of the adult caseload per year.

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3.0 DOCUMENTATION AND VERIFICATION

This section describes requirements related to documentation and verification for RSS.

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 training 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

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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 section. 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.

WRPD contains an option to upload confidential documents, which cannot be viewed by anyone outside the agency that uploaded those documents, unless they become the subject of legal proceedings. This feature, therefore, should be reserved for highly sensitive legal or medical documents that are considered critical to the services being reported in WRPD.

3.2.3 Table 1: WRPD Document Categories

WRPD Document Category	**Example Document(s)**
DCF Published Forms	DCF-F-5632-Confidential Information Release and Discussion Authorization
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 stub Appointment confirmation

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	Class attendance sheet

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 Status and Documentation Requirements for the ORR Refugee Resettlement Program* for all ORR-eligible statuses and each of their corresponding acceptable verification documents	Immigration-Related Documents
*Alien Number *The alien number may be found on various immigration documents. It may or may not be found on an I-94, for example, depending on one's status upon US entry. Request all immigration documentation in order to locate the 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 **AND (if applicable)**	Immigration-Related Documents **AND (if applicable)**

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*Although other ID documents may be uploaded, WRPD users must enter the name only as it appears on immigration verification documents, and that name may only be revised in WRPD if the immigration verification documents have also been revised.	-Any other reliable, state-issued document that verifies identity	Other ID Verification Documents
Date of Birth	-Any unexpired immigration document that includes a date of birth, from the above ORR resource **OR** -Any other reliable, state-issued document that verifies birth date	Immigration-Related Documents **OR** 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
Case Notes or Comments	-Case notes or comments must have a corresponding verification item if: 1. They describe a change that was made to data entered by another agency (e.g. alien number corrected, corresponding Immigration Document uploaded) (**Exception: address changes do not require a verification item, only a case note or comment**) 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)	1. Dependent on the change that was made 2. DCF Published Forms
WRPD Services Requiring Verification and/or Case Notes		
Service	**Acceptable Forms of Verification**	**WRPD Document Category**

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Filed Immigration Forms (e.g. Affidavit of Relationship, form I-730, form I-821, etc.)	-A copy of the application receipt must be uploaded	-Immigration-Related Documents
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 application receipt must be uploaded	-Immigration-Related Documents
Complete N-648 (Citizenship Assistance)	-A copy of the application receipt 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 waiver receipt 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 form receipts 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 (*Do not upload the AVS*)	
RSS ESL – ESL	-Use of the WRPD ESL assessment Or -Any ESL assessment, which must be uploaded into WRPD	-Other supporting documentation
SSI Application Approval	-The SSI Application Approval must be uploaded	-Other Supporting Documentation

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Wellness Group post-assessment completed with improved well-being	-Wellness Group post-assessment must be uploaded and/or case notes or comments must describe Wellness Group assessment and assessment outcome	-Other Supporting Documentation
Completed Service Plan (SOR)	-Case notes or comments that describe the enrolled individual's needs and the programs and/or services intended to help meet those needs -One additional case note/comment reporting on progress made in the program	

*This ORR document is the most comprehensive resource for acceptable proof of all ORR-eligible statuses. Please contact 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

Digital versions of case records are as valid as paper copies. Sub-recipients are not required to retain paper copies if the document has been scanned into the Wisconsin Refugee Programs Database (WRPD). All required documents must be uploaded within 10 working days of receipt. Documents stored in WRPD may be printed or copied digitally if necessary.

Paper documents that have been uploaded into WRPD may be destroyed at any time. This includes copies of birth certificates, Social Security cards, marriage certificates, immigration documents, etc. Original documents must be returned to the owner. If your agency is unable to return original documents (such as check stubs) to the owner, do not destroy the originals. Keep them in a paper case file in a locked cabinet until they can be returned. Documents that are turned in and are not expected to be returned (i.e. photocopies) can be destroyed after uploading into WRPD.

After uploading, BRP recommends storing the paper documents for at least one week in case an operator error is discovered. If that happens, the document should be uploaded again. Some documents are confidential and can only be viewed by certain individuals associated with the case. If documents appear to be missing, check to make sure there are not confidential documents associated with the case before uploading again.

All required documents, found in Table 2 of Section 3.2.4 of this manual, must be uploaded into WRPD. If a sub-recipient chooses to keep paper case files in addition to meeting WRPD requirements, paper case documents that are not otherwise required to be uploaded into WRPD must be retained for three years after the case closes. However, paper case documents must be retained for longer than three years if any litigation, claim, or audit is unresolved. In these cases, do not purge the case file until three years from when the issue(s) have been resolved. The terms "litigation," "claim," and "audit" include but are not limited to lawsuits, fair hearings, federal or state program monitoring, Legislative Audit Bureau (LAB) audits, etc.

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4.0 ORR GLOSSARY OF TERMS/DEFINITION OF SERVICES

BRP uses ORR's definitions for services. The following table includes the terminology found in §400.154 and §400.155.

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.

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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

5.1 RCA Overview

In the state of Wisconsin, the Refugee Cash Assistance (RCA) program is administered by TANF-administering agencies, referred to in Wisconsin and in this manual as W-2 agencies. RCA models itself after the W-2 program in many ways, and is included in the Bureau of Working Families' (BWF) W-2 contracts. BWF and BRP are both located in the Division of Family and Economic Security (DFES) in the Department of Children and Families (DCF), and BRP reviews and updates the RCA portion of the W-2 contract on a regular basis.

While refugees with children under the age of 18 may qualify for W-2 assistance, others (such as single individuals or couples without children under the age of 18) will not. The goal of the RCA program is to provide a basic standard of living to those recently arrived refugees who do not qualify for W-2, and to promote rapid economic self-sufficiency. Most RCA recipients, with a few noted exceptions, must participate in mandatory employment and training activities until either attaining employment or the end of the RCA benefits period, in order to attain economic self-sufficiency.

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. Any and all W-2 requirements pertaining to training and/or certification for the use of those systems applies.

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 RCA Application Process

In this section:

5.2.1 Applying for RCA
5.2.2 Requesting RCA
5.2.3 Completing the RCA Application
5.2.4 Determining Eligibility and Making an RCA Placement
5.2.5 RCA Application Processing Timeframes

5.2.1 Applying for RCA

Any individual may apply for RCA by submitting to a W-2 agency a completed Wisconsin Works (W-2) and Related Programs Registration (DCF Form 14880) form, which is located on DCF's Forms Search page. Outside of Milwaukee, refugees who wish to apply for RCA must apply at the W-2 agency serving their W-2 geographical area. Similarly, refugees living in Milwaukee's West Central and Milwaukee's Northern or East Central W-2 geographical areas, in which RCA and RMA are not processed, must apply for services at the West Central W-2 geographical office.

If the W-2 agency at which an individual applies for RCA is not a county or tribe and the individual is also applying for Income Maintenance (IM) programs (such as FoodShare or Medical Assistance), the W-2 agency may coordinate services with the agency providing the IM Programs; for example, in certain regions it may be preferable to W-2 and IM agencies to apply for RCA, FoodShare and Medicaid at the same time by sending the applications to a designated "Refugee Inbox"; however, these practices vary by agency and region.

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),

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whether by providing them with a link to the ACCESS application (access.wi.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.

There are times when an individual may not be able to complete the RCA application forms personally. The Wisconsin Works (W-2) and Related Programs Registration (14880) paper registration form may be accepted from an applicant's authorized representative. See 1.4.1.2 of the W-2 manual for examples of authorized representatives. As in the W-2 program, when an applicant chooses to use an authorized representative, both the applicant and the authorized representative must complete the Authorization of Participant Representative (2375) (DCF Forms Search). The agency cannot refuse an authorized representative unless the authorization itself appears to be fraudulent. The authorized representative is responsible for submitting the signed Wisconsin Works (W-2) and Related Programs Registration (14880) paper registration form and/or application and any required documents (DCF Forms Search).

5.2.2 Requesting RCA

An individual may apply for RCA at any time by submitting a signed Wisconsin Works (W-2) and Related Programs Registration (14880) to that geographic area's designated W-2 agency (Find Your Local W-2 Agency).

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).

A signed copy of the Wisconsin Works (W-2) and Related Programs Registration (14880) must be scanned into ECF. See Section 5.6.1 for more detailed verification requirements.

5.2.3 Completing the RCA Application

No later than five working days after the date the agency receives a signed Wisconsin Works (W-2) and Related Programs Registration (14880), the W-2 agency must schedule an initial appointment, when the Financial Employment Planner (FEP) and the RCA applicant meet. During this interactive interview, the FEP gathers information about the RCA group's financial and nonfinancial eligibility. While RCA eligibility cannot be tested through CARES and RCA payments are not issued through CARES/CWW, the FEP should enter the collected financial and nonfinancial eligibility information into CARES so that the information can be properly stored and later accessed. If the applicant has applied for other programs administered through CARES, the information may already be present in the system. In such cases, the FEP should update the CARES information as necessary to ensure that it is correct and up-to-date.

All applicants requesting RCA services must complete and sign an RCA application, either:

- The Application Summary that prints out of CWW at the completion of the interactive interview, or
- The Wisconsin Works (W-2) and Related Programs Application (2471) paper form, which is equivalent to the Application Summary and can be used when the CARES system is unavailable.

Note: The FEP should request W-2 in order for CWW to issue the Application Summary at the completion of the interactive interview. The FEP should remember to suppress any generated W-2 notices so as not to confuse the applicant.

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All other adults in the RCA assistance group must also sign the RCA application.

By signing the RCA application, the individual attests that:

- All information provided in the application is correct and complete and
- He or she understands and agrees to basic policies of the RCA program, such as the fraud rules and the right of the W-2 agency to request and receive information from other sources.

A home visit may be conducted as a reasonable accommodation for someone in order to secure his or her signature. When a home visit is required, the FEP must document the date of the home visit in case comments.

The application must be signed in the presence of a W-2 agency representative, even if an authorized representative is signing the application. If an application is signed with a mark, two witnesses' signatures are required.

The Wisconsin Works (W-2) and Related Programs Registration (14880) and Wisconsin Works (W-2) and Related Programs Application (2471) paper form (if used) must be scanned into ECF.

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

5.2.4 Determining Eligibility and Making an RCA Placement

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 section 5.4.7.2 of this manual 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 20-29 hours a week
    - 1/2 CSJ: $327, working 15-19 hours a week
    - 2/3 CSJ: $435, working 10-14 hours a week

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Initial placement decisions, as well as any change in placement decisions throughout the course of processing an RCA case, must be documented. Placement changes, which will result in a difference in payment amounts, must be reflected in the payment for whichever payment month immediately follows the placement change, rather than attempting to correct a payment mid-month for a payment that was already made at the beginning of that month.

5.2.5 RCA Application Processing Timeframe

Below are the RCA application processing timeframes to which all W-2 agencies must adhere:

1. The same day or no later than the following working day after any individual expresses interest in applying for RCA, a W-2 agency representative must schedule an appointment. Individuals interested in RCA must be given the opportunity to sign a Wisconsin Works (W-2) and Related Programs Registration (14880).

2. The RCA initial appointment must take place no later than 5 working days after the date the agency receives a signed Wisconsin Works (W-2) and Related Programs Registration (14880).

3. No later than 7 working days after the first meeting with the FEP, the FEP must determine RCA eligibility and make the most appropriate placement for the applicant.

4. The initial payment, pro-rated from the date of application, must be made within 5 working days of determining eligibility.

Note the backdating policy stated in section 5.2.2 of this manual: 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).

5.3 RCA Assistance Groups

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, and anyone making up an assistance group is responsible for full participation in the RCA program. In other words, all RCA requirements described in this manual apply to both members of an RCA assistance group size of two.

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. Note that there may be an exception, however, if an 18-year old who is part of a W-2 case is eligible to remain on that case due to the date of their upcoming high school graduation, in accordance with section 2.2.1 (#16) of the W-2 manual.

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,

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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.

EXAMPLE 1: A household consists of six refugees living together: a husband, wife and child over age 18, the wife's sister and her husband, and the mother's unmarried brother. The household would consist of four RCA assistance groups:

- Husband and wife: one RCA assistance group
- Child over age 18: one RCA assistance group
- Wife's sister and husband: one RCA assistance group
- Wife's unmarried brother: one RCA assistance group

One or more minor siblings living in a single household with adult caretaker relatives instead of their parents form one RCA assistance group. However, one or more non-sibling minors living in a single household with adult caretaker relatives would each form individual RCA groups.

EXAMPLE 2: A household consists of a mother, father and their minor children, the minor son and daughter of the mother's sister and the minor child of the mother's brother. The household would consist of the following assistance groups:

- Mother, father, and their minor children: one W-2 assistance group
- Niece and nephew who are brother and sister: one RCA assistance group
- Nephew with no siblings: one RCA assistance group

5.4 RCA Nonfinancial Eligibility

In this section:

5.4.1 Eligibility Overview
5.4.2 Immigration Status
5.4.3 Date of Eligibility
5.4.4 Wisconsin Residency
5.4.5 Ineligibility for W-2 Paid Placement and Non-Receipt of SSI and Kinship Care
5.4.6 Job Quit or Job/Interview Refusal
5.4.7 Employment and Training
5.4.7.1 Employment and Training Requirements
5.4.7.2 Exemptions
5.4.7.3 Appropriate Employment and Training Requirements
5.4.7.4 Sanctions
5.4.7.5 Family Self Sufficiency Plan (FSSP) and Employability Plan (EP) Requirements
5.4.8 Not Be Enrolled as Full-Time Student in Higher Education
5.4.9 Not Be Enrolled in Matching Grant Program

5.4.1 Eligibility Overview

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. Be within the eight-month eligibility time period currently in place, as determined by the Office of Refugee Resettlement Director;
3. Be a resident of Wisconsin;

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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.

5.4.2 Immigration Status

To qualify for Refugee Cash and Medical Assistance, individuals must provide proof, in the form of documentation issued by the U.S. Department of Homeland Security, of one of the immigration statuses outlined in section 1.2.1 of this manual.

5.4.3 Date of Eligibility

Date of Eligibility is equivalent to the first day that an applicant obtains an RCA-eligible status. This may be the date of entry into the U.S. stamped on a refugee's I-94, the date on which an individual is granted asylum, or any other dates pertinent to conferring eligible status in accordance with changing circumstances and ongoing guidance. For those who become eligible on or after May 5, 2025, eligibility for Refugee Cash and Medical Assistance is limited to the eight-month period following the date of eligibility in the United States. Therefore, the agency may need to make pro-rated payments at the beginning and end of any eligibility period, based upon the number of days eligible in relationship to the number of days in the month.

Follow the guidelines below to determine date of eligibility (eligibility start-date):

1. For individuals paroled as refugees or asylees under §212(d)(5) of the Immigration and Nationality Act (INA), use Date of Arrival.
2. For Refugees admitted under §207 of the INA, use Date of Arrival.
3. For Asylee(s) whose status was granted under §208 of the INA, use Date Eligible Status Granted;
4. For Cuban and Haitian entrants, in accordance with the requirements in 45 CFR § 401.2, use Date Eligible Status Granted (e.g. Date of Entry into the US).
5. For 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 9th 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)), use Date of Arrival.
6. For 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), use Date Eligible Status Granted.
7. For certain Iraqi and Afghan Special Immigrant Visa holders (SIV) pursuant to the Defense Authorization Act for Fiscal Year 2008, Public Law 110-181, use Date of Arrival.
8. For Afghan Special Immigrant Parolee as described in ORR Policy Letter 22-02 and ORR Policy Letter 22-10, use October 1, 2021 or Date "entered community", whichever is later.

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9. For Afghan Special Immigrant Conditional Permanent Resident as described in ORR Policy Letter 22-02 and ORR Policy Letter 22-10, use October 1, 2021 or Date "entered community", whichever is later.
10. For Afghan Humanitarian Parolee as described in ORR Policy Letter 22-02 and ORR Policy Letter 22-10, use October 1, 2021 or Date "entered community", whichever is later.
11. For Ukrainian Humanitarian Parolee and Non-Ukrainian Individual Displaced from Ukraine as described in ORR Policy Letter 22-13, use May 21, 2022, or the individual's date of humanitarian parole, whichever is later. If a UHP or other non-Ukrainian individual displaced from Ukraine obtains Temporary Protected Status (TPS), the individual will remain eligible until the end of the individual's parole term, due to their underlying receipt of humanitarian parole per INA section 212(d)(5). Note, however, that an individual with only TPS and no underlying humanitarian parole is not eligible for ORR benefits and services.
12. For Lawful permanent residents who previously held one of the statuses identified above; use the guidance for that previously held status listed above.

Note that funds may not be used to provide services to United States citizens, as United States citizens are ineligible under the authorizing legislation.

5.4.4 Wisconsin Residency

To be eligible for RCA benefits in Wisconsin, a refugee must be a resident of Wisconsin.

Secondary migrants (refugees who move to Wisconsin from a different state) may be eligible for RCA. If there is reason to believe the secondary migrant was receiving RCA in the previous state, use appropriate verification request procedures to request verification that the RCA benefits in the other state have been terminated. Pend the case while verification is being sent. If the individual has made a reasonable effort and cannot obtain the required verification, does not have the power to produce verification or requires assistance to do so, the W-2 agency must assist the individual. In such cases, contacting the worker in the other state would likely be the most efficient way of verifying the information. See Section 5.6.1 of this manual for more details about verification requirements.

Secondary migrants who were receiving RCA in another state must submit a cash assistance application in Wisconsin in order to be RCA-eligible. They are subject to the same financial and nonfinancial eligibility criteria as other refugees, including the eligibility time-limit.

5.4.5 RCA and Eligibility for Other Benefits Programs

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 eligibility period.

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

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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 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.

Note that the rules detailed above regarding the stopping of RCA payments upon receipt of funds from another program (e.g. SSI or Kinship Care) apply to the entire RCA assistance group. In other words, an RCA case size of two is still one assistance group, and that assistance group becomes ineligible for RCA in the above-described circumstances.

5.4.6 Job Quit or Job/Interview Refusal

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.

EXAMPLE: A practicing Muslim (whose religion prohibits the eating of pork or use of alcohol) cannot be sanctioned for refusing to butcher pigs or serve alcohol. This individual would have "good cause" for refusing such employment.

5.4.7 Employment and Training

5.4.7.1 Employment and Training Requirements

All adult RCA recipients who are not exempt according to section 5.4.7.2 must be enrolled in services at a qualifying agency providing employment services and must participate in those services within 30 days of receipt of the first RCA check. If there is an RSS Employment and Employability (RSS-E&E) service provider in the area (use this BRP list to locate RSS-E&E service providers, designated by those that list

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"Employment" programs), the individual must be referred to RSS-E&E. For any referrals, 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 5.6.7 of this manual.

5.4.7.2 Exemptions

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
- Under 16 years of age

Note that having an "exempt" status automatically results in a W-2 T placement, as described in section 5.2.4 of this manual. Note also that one's status as an additional member of an RCA assistance group made up of more than one person does not qualify an individual as exempt, which is also highlighted in section 5.3 (RCA Assistance Groups) 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 exemption reasons and/or reasons for changes to exemptions must be provided as follows:.

- Pregnancy: Medical statement from a doctor or other qualified medical provider
- Decision pending for SSI or SSDI: Self-report of intention to apply or application underway (once SSI/SSDI payments begin, however, follow Unearned Income verification guidance in section 4.1.2 of the W-2 manual)
- Lack of work authorization: Immigration documents indicating a status that is not work-authorized

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Note that in cases in which the RCA recipient is not work-authorized, the exemption status may change upon a reported work authorization change, which may result in a placement change as well. Such changes must also be supported with documentation.

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.

5.4.7.3 Appropriate Employment and Training Requirements

As a condition of RCA eligibility, adult clients must participate in employment-related services as described in section 5.4.7.1 of this manual, go to any appropriate job interview arranged by the employment and training agency and accept any appropriate offer of employment.

To be considered appropriate, employment and training services and job offers must:

1. Be within the scope of the participant's employability plan.
2. Be related to the ability of the person to perform the task on a regular basis. Any claim of adverse effect on the participant's physical or mental health must be based on information from a physician or psychologist indicating that participation would impair the individual's physical or mental health.
3. Not have a total daily commuting time (to and from home to the site) that normally exceeds 2 hours.
4. Meet federal, state and local health and safety standards.
5. Not discriminate on basis of age, sex, race, creed, color or national origin.

   Have a wage that meets or exceeds the appropriate federal or state minimum wage law.
6. Not require daily or weekly hours of work that exceed the number of hours usually worked in the job.

Appropriate work can be temporary, permanent, part-time, full-time, or seasonal. Training must be designed to meet local employers' requirements so that the individual is competitive in the local labor market and the training must be likely to lead to appropriate employment, as defined above.

Participants are not required to accept an offer of employment if:

1. The job is vacant due to a strike, lockout, or other bona fide labor dispute.
2. The employment would violate the rules of his or her existing union membership. However, employment not governed by the rules of his or her union may be appropriate.

5.4.7.4 Sanctions

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:

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

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

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1. Partial Sanction due to Partial Compliance (CSJ: $490, W-2 T: $456, 1/3 CSJ: $163, ½ CSJ: $245, 2/3 CSJ: $326)
2. 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 and six-month Eligibility Reviews. If non-compliance is discovered for some reason outside of one of these 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 an Eligibility Review. Sanctions may not be applied retroactively. Whenever a sanction is discovered, the following month is the first month during which a sanction may be applied. This is to avoid having to apply complicated and unpracticable overpayment procedures for retroactive sanctions.

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-DETM13770, 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.

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).

Making a sanction decision or determining that the reason for a sanction has been resolved is the responsibility of the FEP, and is based on available information. 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

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 of this manual pertains to pertinent FSSP requirements of other ORR-funded programs (RSS E&E) and applies to this section as well. In that section, the manual lists the following as a required service of the program: "Share FSSPs and individual EPs of participants who are co-enrolled in W-2, RCA,

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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 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. If the FEP discovers that an FSSP has not yet been created for the RCA recipient, but will be in the future, arrangements must be made for that FSSP to be sent to the FEP as soon as possible, and the completion of the Rights and Responsibilities Agreement form must be completed to the best of the FEP's ability, based on the information gathered from the resettlement agency.

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.

5.4.8 Not Be Enrolled as Full-Time Student in Higher Education

Refugees who are enrolled as full-time students in an institution of higher education are not eligible for RCA. However, a professional in need of recertification services in order to practice his or her profession in the U.S. is allowed to attend a full-time college or professional training program provided that the individual is employed, the training is approved as part of the individual's employability plan, and the training program does not last longer than one year.

This information is obtained from the applicant during RCA enrollment.

5.4.9 Not Be Enrolled in Matching Grant Program

If an RCA applicant group is participating in the federal Matching Grant program, which is administered through a resettlement agency, they are not eligible for W-2 or RCA. When the FEP contacts the resettlement agency to inform them that an applicant has applied for RCA and to inquire about other eligibility rules, also determine if the applicant is participating in the Matching Grant Program.

If a refugee is no longer participating in the Matching Grant program, he or she regains eligibility for RCA for the remainder of the eligibility period. Verify with the refugee's resettlement agency worker that he or she is no longer participating in Matching Grant.

To properly deny an RCA application due to participation in Matching Grant, issue a manual negative notice explaining that the applicant is not eligible for RCA because he or she is receiving Matching Grant funds. The notice should mention that they can re-apply for RCA after their participation in Matching Grant ends.

5.5 RCA Financial Eligibility

In this section:

5.5.1 $2500 Gross Asset Test
5.5.2 Asset Availability
5.5.3 115% Gross Income Test
5.5.4 Prospective Income Eligibility
5.5.5 Estimating Income
5.5.6 Income Availability
5.5.7 Fluctuating Income
5.5.8 Prorating Income
5.5.9 Changing Estimated Income
5.5.9.1 Grace Period Early Employment Incentive

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5.5.10 Counting Income
5.5.10.1 Deeming
5.5.10.2 Self-Employment Income
5.5.10.3 Census Employment and Other Temporary Employment Income
5.5.11 Disregarded Income

In addition to meeting the RCA nonfinancial eligibility criteria, applicants must also meet financial eligibility criteria to be considered eligible for RCA. RCA financial eligibility testing consists of both an asset and an income test. Minor parents do not have to pass the asset and income tests.

5.5.1 $2500 Gross Asset Test

At application, the RCA assistance group must have total countable assets that are less than or equal to $2,500.

5.5.2 Asset Availability

Only assets that are actually available for use may be counted. An asset is considered "available" if the person has a legal interest in it and has the legal ability to make it available for support and maintenance. An asset is unavailable when the individual can reasonably document that it cannot be accessed for 31 or more days. A payment may not be counted as an asset and income in the same month. Count income in the month received and any amount remaining as an asset in the following month.

Note: Any assets remaining in the refugee's country of origin are considered disregarded for RCA.

5.5.3 115% Gross Income Test

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 direct assistance provided through ORR's Program of Initial Resettlement (PIR), 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/.

5.5.4 Prospective Income Eligibility

Available earned and unearned income is tested prospectively for RCA eligibility. The FEP makes a best estimate to determine what income will be received by the participant each month.

5.5.5 Estimating Income

To get the best estimate of monthly earned income for employees paid an hourly rate, a FEP must use:

1. (hourly rate) x (average hours per week) x (4.3 weeks per month) if paid on a weekly basis;
2. (hourly rate) x (average hours biweekly) x (2.15 weeks per month) if paid on a biweekly basis;
3. monthly amount if paid on a monthly basis (this includes self-employment and other averaged incomes); or
4. (amount) x (2) if paid twice a month

To get the best estimate of monthly unearned income for the RCA group, the FEP must use:

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1. (weekly amount) x (4.3 weeks per month) if received on a weekly basis;
2. (biweekly amount) x (2.15 weeks per month) if received on a biweekly basis;
3. monthly amount if paid on a monthly basis; or
4. (amount) x (2) if paid twice a month

The prospective income estimate must not be changed due to missed work or irregular spikes in work hours. An RCA assistance group must be prospectively ineligible for two consecutive months before the case closes.

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.

5.5.6 Income Availability

As with assets, only income that is actually available for use may be counted. Income is considered available when the individual has a legal interest in it and has the legal ability to make it available for support or maintenance. Income is considered unavailable when the individual can reasonably document that it cannot be accessed for 31 or more days. Unavailability is usually documented by a letter from an agency or the source stating when the person will receive the income. Income is counted beginning in the first month it is received and thereafter. Until the amount and the payment date are known, the income must not be counted.

A payment received must not be counted as an asset and income in the same month. Current payments must be counted as income in the month received. Any amount remaining becomes an asset in the following month.

5.5.7 Fluctuating Income

If the amount of regularly received income varies, the W-2 agency must use an average. Income that is received on an irregular basis must also be averaged over the period between payments. If neither the amount nor the frequency is consistent or predictable, the income may only be counted for the month in which it is received.

5.5.8 Prorating Income

Income received on a yearly basis or less often may be converted to a monthly amount. The agency may count only income that is predictable in amount and frequency, such as land contract income or income from a trust fund. Count the prorated income beginning in the month it is received.

5.5.9 Changing Estimated Income

Once determined eligible for RCA, if the RCA assistance group has income and it is expected to exceed the 115% gross income limit for at least two consecutive months, the group becomes ineligible for RCA. Participants must report any change in earned or unearned income within 10 calendar days of the occurrence. The FEP must redetermine the best estimate for income when any change in the income's source, rate of pay, or payment schedule has been reported.

5.5.9.1 Grace Period Early Employment Incentive

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.

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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 eligibility for RCA, then a 30-day grace period clock will begin on the job start date. 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 job start date. Example 1 illustrates how the grace period policy should be applied in the instance that the individual is no longer financially eligible for RCA.

Reducing RCA:

If an individual obtained employment totaling less than 30 hours per week, FEPs should continue to follow guidance from section 5.2.4 of this manual, pertaining to Prorated CSJs. If the individual is determined to be eligible for a prorated CSJ, the grace period policy applies only to the month for which the full CSJ-level payment has already been issued. The prorated CSJ payment level must then be applied beginning the first of the month following the job start date. Example 2 illustrates how the grace period policy should be applied to a prorated CSJ placement.

Grace Period Financial Reporting:

The grace period payments will be reported in a separate line item in SPARC, called RCA Incentive Payments. The line item code to be used for these payments is 0134A. Grace period payments should be recorded in SPARC in the month they are made. This may require making a report correction, which SPARC accountants can do upon request for up to 90 days after the end of the reporting month.

5.5.10 Counting Income

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 direct assistance provided through ORR's Program of Initial Resettlement (PIR), 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/.

In some cases, the different members in an RCA assistance group may have different dates of eligibility. In such a case, consider any applicable income of the first-arrived spouse (such as employment earnings) when determining RCA eligibility for the group based on entry of the newly-arrived spouse. In cases of a financially eligible assistance group, the group would remain eligible for RCA through the end of the newly arrived spouse's RCA eligibility period.

5.5.10.1 Deeming

United States Citizenship and Immigration Services (USCIS) requires certain individuals who are admitted as permanent resident aliens to have a sponsor sign an affidavit of support to ensure that the immigrant does not become a public charge. In these cases, the sponsor's income may be counted or "deemed" to be available to the sponsored alien when determining financial eligibility for W-2 or other public benefits.

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Refugees' relationship to sponsors, however, differs from the relationship described above. A refugee is typically "sponsored" by a Resettlement Agency, whose role is to help the refugee effectively settle into their new community and become socially and economically self-sufficient. In some cases, a refugee may also be "sponsored" by individuals or groups in the community (such as church groups), and may be given additional help by friends or relatives (often themselves refugees) who are more acclimated to the community. These agency and individual sponsors do not meet the USCIS definition of a sponsor because they do not have legal obligations to provide financial support to the refugee. W-2 agencies should not, therefore, deem a sponsor's income for any of the groups listed with refugee status even if they obtain permanent resident status.

> **EXAMPLE:** A single female refugee arrives to the U.S. on 3/1/2012 and is assigned to the local resettlement agency. The woman has relatives in the community who arrived as refugees two years ago and are able to further help her with her integration into American life. When determining RCA financial eligibility, the income of the woman's relatives should not be counted.

5.5.10.2 Self-Employment Income

If a refugee begins to receive self-employment income, the W-2 agency must count the gross receipts from the self-employment business. As in W-2, gross receipts must not be adjusted based on expenses. If IRS tax forms were completed for the previous year, use these forms to calculate the self-employment income. Depending on when in the eligibility period falls in the calendar year, the IRS tax forms from the previous year may not be available. In such cases, calculate the income using average monthly anticipated earnings.

5.5.10.3 Census Employment and Other Temporary Income

Income from temporary employment, including employment as a census enumerator, is counted when determining RCA financial eligibility.

5.5.11 Disregarded Income

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 3.8 of the W-2 manual, and Welcome Corps funds granted to the RCA recipient, up to the current amount of direct assistance provided through ORR's Program of Initial Resettlement (PIR). 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 RCA Case Processing Requirements

In this section:

5.6.1 RCA Eligibility Verification Requirements
5.6.1.1 Information Requiring Eligibility Verification
5.6.1.2 Requesting Verification from RCA Participants
5.6.1.3 Frequency of Verification
5.6.1.4 Income and Eligibility Verification System (IEVS) and Data Exchange (DX)
5.6.2 Requesting and Protecting RCA Participant Information
5.6.2.1 Requesting Information from Third Party Sources
5.6.2.2 Protecting RCA Participant Information
5.6.3 Documenting RCA Participant Information
5.6.3.1 Record of Verification
5.6.3.2 Case comments

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5.6.4 Storing RCA Participant Information
5.6.5 Fraud
5.6.6 Changes
5.6.7 Reviews
5.6.8 Requirements for RCA Notices
5.6.9 Payment Issuance and Reimbursement
5.6.10 RCA Overpayments and Underpayments
5.6.11 RCA Case Transfers
5.6.12 RCA Case Closures

5.6.1 RCA Eligibility Verification Requirements

The W-2 agency FEP must verify financial and nonfinancial eligibility information provided by the members of the RCA assistance group initially, and at the 30-day Eligibility Review. 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 the scheduled review (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, or a determination of ineligibility. 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 Eligibility Review requirements.

5.6.1.1 Information Requiring Eligibility Verification

A list of eligibility criteria along with suggested sources of allowable verification can be found in section 4.1.2 of the W-2 manual.

5.6.1.2 Requesting Verification from RCA Participants

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.

If it is not possible to verify eligibility information using CARES, data exchange or ECF, the applicant or participant is responsible for providing the verification of information that is necessary and appropriate in order for the W-2 agency to make a correct eligibility determination. The applicant or participant has 7 working days from the date the verification request is made to provide the needed verification. The participant must be informed in writing of the verification items required, including the due date.

If extenuating circumstances exist that make the verification requirements unduly burdensome or the verification submitted by the individual is questionable or contradictory, the W-2 agency may extend the verification due date. For RCA applicants, the verification due date may be extended up to 30 days from the date the agency receives a signed Wisconsin Works (W-2) and Related Programs Registration (14880) (DCF Forms Search). Keep in mind, though, that federal regulations require an RCA eligibility determination to be made within 30 days of the date of application. Therefore, for RCA participants, the verification due date may be extended for up to 30 days from the date of the initial request for verification.

If the individual has made a reasonable effort and cannot obtain required verification, does not have the

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power to produce verification, or requires assistance to do so, the W-2 agency must assist the individual. If the agency is unable to assist, the FEP must not deny an application or close a case based on the information that could not be obtained. The agency must use the available information to process the case and then reassess the case when the requested information is received.

If the applicant is able to produce the information but refuses or fails to do so, he or she is not eligible and the case must be denied or closed.

Questionable verification or reporting supplied by applicants or participants must be referred for fraud investigation (See section 13.3.1 of the W-2 manual for more details).

5.6.1.3 Frequency of Verification

There are a number of items that must only be verified once per lifetime, such as:

- Identity
- Social Security Number and
- Birth Date

To assure that these items are only verified once, the FEP must scan copies of the documents used to verify these items into ECF in the appropriate folder based upon the document type. Because RCA applicants may be applying for other public benefits such as FoodShare, the FEP should check ECF for necessary verification before requesting these from the RCA applicant.

Other eligibility criteria must be reviewed when new information is reported or received.

5.6.1.4 Income and Eligibility Verification System (IEVS) and Data Exchange (DX)

See section 4.1.5 of the W-2 manual for information on the systems used and required agency action.

5.6.2 Requesting and Protecting RCA Participant Information

5.6.2.1 Requesting Information from Third Party Sources

While an applicant or participant has primary responsibility for obtaining verification, a W-2 agency has statutory authority [s. 49.143(5)] to request information from any person it deems appropriate and necessary for the administration of RCA. By signing the application, the individual acknowledges that the agency may request information from a third party unless the information is considered confidential.

Cooperation of the third party is expected within 7 working days of the agency's request. The W-2 agency may extend the 7 working day time limit if it is unduly burdensome. The statute does not provide for compensation for the third party.

Applicants and participants must not be penalized when a third party fails to cooperate with a verification request. The FEP must not delay eligibility determination while waiting for information from a third party. Instead, the FEP must use the best available information, including consulting with appropriate agencies at the time of application.

Eligibility must be reassessed when information from third party sources is received.

During the application process, the FEP may refer the applicant for screenings or assessments, some of which require information from a third party source. However, referrals for screenings and assessments are not eligibility requirements and are therefore not subject to verification time lines discussed here.

When requesting confidential information, the FEP must use the *Authorization for Disclosure of Confidential Information (10779)*. This form meets federal and state requirements for the confidential release of information from treatment providers, including Alcohol and Other Drug (AODA) treatment,

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mental health treatment, domestic violence counseling, HIV/AIDS, and medical conditions.

5.6.2.2 Protecting RCA Participant Information

Follow the guidelines in section 4.2.2 of the W-2 manual regarding the safeguarding of RCA participants' information.

5.6.3 Documenting RCA Participant Information

5.6.3.1 Record of Verification

As in the W-2 program, RCA eligibility information requiring verification must be either "validated" or "documented." See section 4.2.2 of the W-2 manual for guidelines on validation and documentation.

5.6.3.2 Case Comments

Workers processing RCA cases should follow the guidelines on case comment usage found in section 4.3.3 of the W-2 Manual.

5.6.4 Storing RCA Participant Information

The standards regarding storage of W-2 participants' data also applies to RCA participants. See the following parts of the W-2 manual for more information:

- *Electronic Case File (ECF)* (See 4.4.1)
- Scanning Requirements (See 4.4.2)
- Record Retention Requirements (See 4.4.3)
- Access to ECF by an Authorized Representative (See 4.4.4)
- Scanning Consistency Within an Agency (See 4.4.5)
- Storing Confidential Information (See 4.4.6)

5.6.5 Fraud

The W-2 agency is responsible for ensuring the integrity of the RCA program that it administers. As with the W-2 program, the W-2 agency must accomplish this responsibility by operating a fraud prevention program to identify and prevent errors/fraud at application, and investigating or referring possible fraud for investigation.

Fraud in the RCA program is defined as anyone who, with knowledge and purpose, makes false statements, suppresses facts, misrepresents circumstances, or fails to report a change in circumstance in order to obtain an RCA payment. An example of participant fraud is when an individual reports being unemployed during a period of time an employer reported earnings for that individual. However, it is important to keep in mind (especially for refugee populations) that a misstatement by an individual due to the individual's misunderstanding on what constitutes income may not be considered fraud.

When investigating possible fraud, the agency must give the individual adequate notice and opportunity to respond to and, if necessary, appeal the allegation.

See also 13.2.1 in the W-2 manual for guidance on preventing fraud by using front-end verification and 13.3.1 in the W-2 manual for more information on fraud investigation.

5.6.6 Changes

The participant's RCA change-reporting responsibilities are detailed in the DCF-F-Rights and Responsibilities Agreement, which the participant is required to sign. RCA participants are required to notify the W-2 agency of certain changes (including changes in income, assets and family structure) within 10 calendar days of their occurrence. Additionally, participants must inform the agency of any

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changes in their mailing address or phone number. The agency must respond to reports in a timely manner and keep case data up to date.

When a refugee reaches the end of the eligibility period, review the case file to determine possible eligibility for W-2 due to changed circumstances.

5.6.7 Reviews

In addition to verifying initial eligibility, agency FEPs are required to schedule and complete an Eligibility Review at 30 days and six months post-enrollment. Completion of the reviews must be done using form 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 the 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 first Eligibility Review must take place 28-35 calendar days after the initial enrollment appointment and the second must take place 170-190 calendar days after the initial enrollment appointment. These 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 the Eligibility Review, the FEP must complete it 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

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**
DCF-F-14880 W-2 and Related Programs Registration	To apply for RCA	To be completed by RCA recipient or their representative
DCF-F-2471 W-2 and Related Programs Application	To document that W-2 program eligibility has been tested	To be completed manually when online systems are not available, uploaded within 5 days of completion
DCF-F-5765 Rules, Rights and Responsibilities Agreement	To inform RCA recipient of their rights and responsibilities while receiving RCA	To be completed during initial eligibility, uploaded within 10 days of completion, copy given to RCA recipient
DCF-F-13753 RCA Eligibility Notice of Decision	To inform RCA recipients when/why they have been found eligible for RCA	Issued to client at initial eligibility appointment or mailed within five days
DCF-F-13758 RCA Ineligibility Notice of Decision	To inform RCA recipients when/why they have been found ineligible for RCA	Issued to client at initial eligibility appointment or mailed within five days
DCF-F-13770 RCA Sanctions Notice of Decision	To inform RCA recipients the reasons for and conditions of a sanction decision	Completed and mailed to the RCA recipient within five working days of the discovery of non-compliance
DCF-F-13768 RCA Work Programs Notice of Referral	To inform RCA recipients of referrals to work programs (must match assigned activities on Rights & Responsibilities form)	Completed as needed when other referrals have not already been made, such as established service provision at a Resettlement Agency

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DCF-F-15725 Sample RCA Overpayment Notice	To inform RCA recipients of the occurrence and circumstances of an overpayment	Completed and mailed to the RCA recipient within five working days of the determination that an overpayment was made
DCF-F-15721 RCA Repayment Agreement	To inform RCA recipients of the repayment expectations associated with an overpayment	Completed and mailed to the RCA recipient within five working days of the determination that an overpayment was made
DCF-F-13767 RCA Termination-Notice of Decision	To inform RCA recipients of the occurrence and circumstances of a case closure	Completed and mailed to the RCA recipient at least ten working days prior to the date upon which RCA will be terminated
DCF-F-5764 RCA Eligibility Reviews	To verify ongoing eligibility on a prescribed schedule	To be completed during initial eligibility and 28-35 days from enrollment; uploaded within 10 days of completion

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

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 working 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.

5.6.10 RCA Overpayments and Underpayments

W-2 agencies must maintain a procedure to ensure the recovery of overpayments and correction of underpayments for the RCA program.

5.6.11 RCA Case Transfers

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.

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If a FEP is made aware of an RCA recipient's move from one Wisconsin location to another, it is that FEP's responsibility to attempt to provide that RCA recipient with information related to the W-2 agency in the new location, and to follow case closure procedures, if possible. If case closure procedures may be followed, indicate "Case Transfer" in the "Other" option on the form DCF-F-DETM13767 RCA Termination-Notice of Decision (DCF Forms Search).

5.6.12 RCA Case Closures

Each RCA case must be officially closed by issuing form DCF-F-13767 RCA Termination Notice of Decision (DCF Forms Search) at least ten working days prior to the date upon which refugee cash assistance will be terminated.

5.7 RCA Fair Hearing Process

The state will use the following fair hearing procedure:

When an RCA applicant or recipient disagrees with an agency's action (on his/her request for benefits, amount of benefits, overpayment or termination), an agreement is often reached through an adjustment of the benefit or explanation of the program rules by the agency. However, if no agreement is reached, the applicant/recipient may request an administrative review by the Division of Hearings and Appeals through the fair hearing process.

Hearings serve to:

1. Interpret the program to dissatisfied clients.
2. Bring the applicant/recipient, the agency and state authorities into discussion for a better understanding of problems.
3. Resolve factual disputes.
4. Clarify policies and their application in relation to laws and regulations.
5. Review policies in program administration and reveal those which require clarification or revision.
6. Promptly remedy unfair treatment, mistaken or arbitrary action and negligence.

The hearing process is not intended to be a substitute for responsible administration. Neither good nor bad administration is necessarily reflected in the number of hearings involving any one agency. For example, an applicant/recipient may request a hearing as a protest against a requirement which is not within the agency's power to adjust.

Applicants/recipients must request fair hearings in writing, using the Request for Fair Hearing form (found here). All hearing requests must then be forwarded to the Division of Hearings and Appeals (DHA). DHA will schedule a hearing upon receipt of the hearing request.

DHA's mailing address is:

Division of Hearings and Appeals
P.O. Box 7875
Madison, WI 53707-7875
Fax (608) 264-9885

Email: DHAMail@wisconsin.gov

If the written request is received by the agency, promptly forward it to DHA at the above address.

DHA has jurisdiction to conduct hearings for RCA when the hearing request is received by DHA within 45 days of the action effective date. A hearing must be held to determine if or when an applicant/recipient

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received the notice of adverse action even if the agency, whose action is being appealed, believes that a request was not timely.

Fair Hearing Dismissal

DHA may dismiss a request at the hearing if the action is a result of a change in federal or state law or policy affecting a significant number of clients unless a client questions its application specific to his/her case.

When a hearing request is dismissed, DHA will notify the client.

Expediting Fair Hearings

DHA may expedite any hearing request from an applicant/recipient who plans to move from the hearing officer's jurisdiction (e.g., migrant worker) before a decision would normally be issued. If necessary, DHA may process the request faster than other requests so the client can receive a decision and any restored benefits before s/he leaves your area.

Group Fair Hearings

A group of individuals may request a group hearing if individual issues of fact are not disputed and the sole issue being appealed is a state, federal law, or policy. DHA may also consolidate several hearings on the same topic into one, but only on questions of policy. Procedures for group hearings are the same as in individual hearings.

Overpayment Disputes

The right to appeal the collection of an overpayment is limited to only one hearing request, per overpayment claim, and is limited to:

- Determination of the overpayment amount (at the time of the overpayment determination and/or during the collection process)
- Determination of the overpayment amount still owed during the collection process

Any subsequent appeal requests must be limited to questions of prior payment of debt that the agency or DWD is proceeding against, or mistaken identity of the debtor.

6.0 REFUGEE MEDICAL ASSISTANCE

6.1 RMA Overview

In Wisconsin, RMA provides the same level of benefits as Medicaid and is considered part of the Wisconsin Medicaid/BadgerCare Plus program, though it is funded separately. RMA is administered by *W-2* agencies with guidance from the Bureau of Refugee Programs of the Wisconsin Department of Children and Families' Division of Family and Economic Security (DFES)/Bureau of Working Families (BWF).

6.2 RMA Application Process

W-2 agencies have contractual responsibility for receiving and processing RMA applications. The W-2 agency must follow all financial and non-financial eligibility guidance herein to make an eligibility determination for each applicant.

6.2.1 Applying for RMA

Any individual wishing to do so must apply for RMA at the W-2 agency serving their geographical area (see W-2 Agency Locator) by completing the RMA Application (DCF-F-5998, DCF Forms Search)], so that

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the W-2 agency may determine RMA eligibility in accordance with RMA eligibility guidance found in this manual.

In certain cases, an authorized representative or other designated individual may sign the application for the applicant. Refugees may give permission for their Resettlement Agency caseworker to act as their authorized representative using the Wisconsin Works (W-2) and Related Programs Authorization of Participant Representative form (DCF-F-DWSP2375, DCF Forms Search)].

If an applicant contacts a different agency than the one serving their geographical area, they should be redirected immediately to the agency responsible for processing the application. If an application is received by the wrong agency, it must be date stamped by the first receiving agency and redirected to the agency responsible for processing that application no later than the next business day. The filing date remains the date it was originally received by the first agency.

6.2.2 RMA Application Processing

The RMA application (DCF-F-5998, DCF Forms Search) is considered valid when it includes the applicant's name, address and signature. The date that the agency receives the valid application is the filing date. If the applicant is unable to sign their name and/or signs with a mark, then two witness signatures are required in order to validate the application and filing date. RMA applications must be processed within 30 days of this filing date.

6.3 RMA Assistance Groups

The income and assets of RMA assistance group members are considered together when determining RMA financial eligibility. An RMA assistance group consists of either a family with minor children, an unmarried adult refugee (18 years or older), or a married couple without dependent children.

An RMA assistance group consists of either an unmarried adult refugee (18 years or older), a legally married couple, or a legally married couple and their dependent children (minors under age 18).If a married refugee arrives at a later date than their first-arrived spouse and does not qualify for BadgerCare Plus, the refugee must be tested for RMA financial eligibility with the first-arrived spouse, though the refugee's (second-arrived spouse) date of arrival will still determine the date of eligibility.

> **EXAMPLE 1:** A refugee household consists of a husband, wife, their two unmarried adult daughters (aged 18 and 20) and the husband's brother. There are *four* RMA assistance groups in the household:
> - Husband and wife: one RMA assistance group
> - Unmarried adult daughter, aged 18: one RMA assistance group
> - Unmarried adult daughter, aged 20: one RMA assistance group
> - Husband's brother: one RMA assistance group
>
> **EXAMPLE 2:** A refugee household consists of a husband, wife and their two minor children. There is one RMA assistance group in the household.

6.4 RMA Nonfinancial Eligibility

Non-financial eligibility for RMA is limited to those individuals who:

1. Possess a qualifying immigration status;
2. Are within the applicable eligibility time period(8 months, effective January 1, 2026);

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3. Are residents of Wisconsin;
4. Are not eligible for Medical Assistance (Medicaid/BadgerCare Plus – BC+); and;
5. Are not enrolled full-time in higher education, (unless school is listed as a goal of an individual's employment plan).

6.4.1 Immigration Status

Refer to section 1.2.1 of this manual for RMA-eligible immigration statuses and adhere to all guidance in ORR's Status and documentation Requirements Policy Letter 16-01, which includes a suggested process for making eligibility determinations and lists the documentation required to verify eligibility.

6.4.2 Date of Eligibility

Given all other eligibility criteria have been met, one's Date of Eligibility is equivalent to the first day that an applicant obtains an RMA-eligible immigration status. This may be the date of entry into the U.S. stamped on a refugee's I-94, the date on which an individual is granted asylum, or any other dates pertinent to conferring eligible status in accordance with ORR Policy Letter 16-01. The time period for RMA eligibility is determined by one's date of eligibility, while the dates during which qualifying medical expenses are covered by RMA are determined by the date of application/filing date and the length of the eligibility period in place at the time. These are the dates that must be used when completing the manual Forward Health certification process described in section 6.6.2 of this manual.

6.4.3 Ineligibility for Medicaid/BadgerCare Plus

In order to be found eligible and certified for RMA coverage, an applicant must first apply and obtain verification of ineligibility for Medicaid/BadgerCare Plus. Unlike other eligibility criteria (e.g. counting income to determine financial eligibility), one's ineligibility for Medicaid as a precondition of determining RMA eligibility must be considered separately for each individual member of the assistance group. This means it is possible that one member of an assistance group may be found eligible for Medicaid, and therefore ineligible for RMA, while another member of the same assistance group may be found ineligible for Medicaid, and therefore eligible for RMA, if all other eligibility criteria are met.

If someone who was receiving Medicaid becomes ineligible due to earnings from employment, that individual may apply for RMA at a W-2 agency and must be certified for RMA eligibility automatically without testing financial eligibility.

There are multiple ways to apply for Medicaid/BadgerCare Plus, which are linked and outlined on the DHS ForwardHealth application page. If the applicant has all information ready from the list on that page (Information to have ready"), they may be able to complete an application online via ACCESS immediately and receive verification of ineligibility more quickly than if they do not have all information ready. If they do not have all information ready from the list, they may apply by completing and following the instructions on the form 10129 Wisconsin Medicaid, BadgerCare Plus, and Family Planning Only Services Registration Application in order to initiate the application process.

6.5 RMA Financial Eligibility

When testing financial eligibility, use the income and resources on the date of application/filing date. Changes after the date of application are not counted. Once an individual is found eligible for RMA, their eligibility shall continue for the duration of the time eligibility period in place at the time regardless of changes in income.

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6.5.1 Rules for Testing Financial Eligibility

Testing financial eligibility must be part of making an eligibility determination if *both* of the following conditions apply:

- Applicants meet all the nonfinancial eligibility standards described in section 6.4, and
- Applicants are not receiving RCA or W-2.

When testing financial eligibility:

- Use the financial eligibility standard established at up to 200% FPL standard (The FPL changes in February of each year. See section 3.2.1 of the W-2 manual for current FPL amounts), based on income and resources beginning on the *date of application*, not prospectively.
- Do not take into consideration income changes that occur after the filing date when determining RMA financial eligibility (Note that this policy significantly differs from Medicaid policy).
- Do not consider in-kind services or shelter provided by a sponsor or resettlement agency.
- Do not consider cash assistance payments.
- If the spouses in a married couple have different arrival dates, any countable income of the first-arrived spouse must be considered when determining financial eligibility of the group (i.e. couple), even though the date of eligibility for the second-arrived spouse shall be based on the arrival date of the second-arrived spouse. Note that earned income of the first-arrived spouse may make the second-arrived spouse financially ineligible.

Testing financial eligibility **must not be part of making an eligibility determination** when *any one of* the following conditions has been met for an individual otherwise eligible according to the nonfinancial eligibility standards described in section 6.4:

- The RMA applicant is ineligible for Medicaid/BC+ and receiving RCA.
- An individual was previously found eligible for RMA and then received increased earnings from employment.
- An individual was previously found eligible for BC+ and became ineligible due to earnings from employment (any individual in this circumstance must be automatically transferred to RMA without *any* eligibility determination).

Note: Due to the elimination of two subsections of chapter 6.5, section 6.5.2 is now titled **Disregarded Income**, which was previously 6.5.4. Section 6.5.3 is now titled **Spend-Down**, which was previously 6.5.5. Section 6.5.4 is now titled **Countable Assets**, which was previously 6.5.6.

6.5.2 Disregarded Income

Refer to section 15.3 of the Medicaid Eligibility Handbook for a list of disregarded income when making an eligibility determination. In addition, the following income and services must be disregarded when making an RMA eligibility determination:

- In-kind services or shelter provided by a sponsor or Resettlement Agency
- Income earned after the date of application
- Other cash assistance, including:
    - Refugee Cash Assistance (RCA)
    - Program of Initial Resettlement (PIR) funds
    - Matching Grant (MG)
    - Welcome Corps funds

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6.5.3 Spend-Down

If, using the above standards, an applicant is found to be above the 200% threshold cited, incurred medical expenses may be deducted from the total available income so that one may fall within the 200% threshold.

6.5.4 Countable Assets

Follow Wisconsin's Medicaid policy regarding the types of assets that must be counted and how to determine if an asset is available when determining and RMA assistant group's assets.

6.6 RMA Case Processing Requirements

6.6.1 RMA Eligibility Verification Requirements

6.6.1.1 Introduction

When verifying information for the RMA program, apply the following guidelines:

- Only verify items necessary to determine eligibility for RMA;
- Do not verify information already verified unless you believe the information is fraudulent or differs from more recent information;
- Do not exclusively require a particular type of verification when various types are possible; and
- Do not discriminate against anyone on the basis of race, religion, national origin, etc. by asking for different verification requirements.

6.6.1.2 Information Requiring Eligibility Verification

The following items must be verified with reasonable supporting documentation:

- Immigration status
- Ineligibility for Medicaid/BadgerCare Plus
- Income
- Medical expenses used to spend down income totals

6.6.1.3 Requesting Verification from RMA Participants

The worker has a responsibility to use all available data exchanges to verify information, but the applicant has primary responsibility for providing verification. Do not deny RMA eligibility when the applicant does not have the ability to produce verification. Assist the applicant in obtaining verification if he or she has difficulty in obtaining it.

Unlike Medical Assistance, information that requires verification for RMA only needs to be verified at time of application.

6.6.2 Certification of RMA Coverage

Once a positive RMA eligibility determination has been made, automatic certification must be done using the Medicaid/BadgerCare Certification Form F-10110 (see CWW Process Help). The time period for RMA eligibility is determined by one's date of eligibility, while the dates during which qualifying medical expenses are covered by RMA are determined by the date of application/filing date and the length of the

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eligibility period in place at the time. Eligibility processing must be done manually using form Medicaid/BadgerCare Plus Eligibility Certification (F-10110). See CWW Process Help to access this form. The medical status codes that may be applicable for this population are the following:

MA Subprogram	Med Stat	Description	CARES category
Refugees, Occasional DOH Funding	88	Refugee, no T19, RMAP, no $	non-CARES
Refugees, Occasional DOH Funding	89	Refugee, institutionalized, no T19, RMAP, no $	non-CARES

In the majority of cases, the medical status code "88" is used.

Due to security reasons, the form should not be submitted through e-mail. Send the completed form to:

- FAX: (608) 221-8815 or
- Mail: Forward Health iChange
  P.O. Box 7636
  Madison, WI 53707-7636

Find more detailed information about step-by-step HCF 10110 processing in Process Help 81.2 – 81.4. (A WAMS ID is required to enter Process Help).

A Forward Health card will be issued to refugees found eligible for RMA.

6.6.2 Reviews

Every RMA recipient's eligibility must be reviewed two months (58-65 calendar days) after the date of RMA enrollment using the internal form DCF-F-5914-E RMA Eligibility Review. This review is intended *only* to avoid the occurrence of dual enrollment in RMA and Medicaid/Badger Care+ following the initial enrollment.

6.6.3 RMA Notices

The following RMA forms must be used for the situations described:

- The form DCF-F-5908 RMA Eligibility-Notice of Decision must be completed for anyone for whom RMA eligibility has been determined, in order to inform them of the eligibility decision that has been made. This form includes important information about enrollment in only one health care program at a time.
- RCA/RMA Termination Notice of Decision DCF-F-DETM-13767

A written notice of termination must be sent or provided to a recipient at least 10 days before the date upon which refugee medical assistance will be terminated.

The forms listed above are available in English and several other languages common among RMA-eligible populations in Wisconsin and can be found on the Forms website. When applicable, interpretation must always be used.

6.7 RMA Fair Hearing Process

The state will use the same fair hearing procedure outlined in section 5.7 of this manual for RCA.

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6.8 Refugee Medical Screening

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). Below is a list of required and allowable services:

6.8.1 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:

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

6.8.2 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:

- Referral for medical screening;
- 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;*
- Coordinate the scheduling of follow-up services to ensure refugees receive appropriate medical treatment;
- Administer participant satisfaction surveys to a random sample of 20% of the adult caseload per year; and
- Record the initial screening date of the first medical screening appointment.

*This, in accordance with the Revised Medical Screening Guidelines for Newly Arriving Refugees (ORR State Letter 12-09). Compliance with 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. 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

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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

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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 email the Bureau of Refuge Programs at DCFRefugee@wisconsin.gov. Individuals who are deaf, hard of hearing, deaf-blind or speech disabled can use the free Wisconsin Relay Service (WRS) – 711 to contact the