Title: Refugee Cash Assistance (RCA)  
 ISSUE DATE: 08/14/2017  
 EFFECTIVE DATE: IMMEDIATELY

Summary
Programs Impacted: CA

This Policy Change Alert is being issued to inform staff of recent changes to the Refugee Cash Assistance (RCA) policy.

RCA is a cash assistance program designed to assist refugees from the date of the refugee's entry into the United States (U.S.) through their first eight months. The arrival month is included in the eight month count. The RCA time period ends the first day of the ninth month after entry into the U.S.

When an application for Refugee Cash Assistance is received, TANF Cash Assistance (CA) eligibility MUST be determined first. If a household is ineligible for TANF CA and the household consists of one or more refugee members, then RCA eligibility must be determined. As a requirement for RCA, parents or other relatives who apply or are receiving RCA are required to comply with all requirements specified in the PRA, except Division of Child Support Services (DCSS).

It is important for TANF eligibility to be determined correctly to ensure proper fund allocation. When CA eligibility requirements are not met, determine eligibility for RCA. An RCA budgetary unit may consist of the following:

- Single or married refugees with no dependents.
- Refugees with their common children.
  
  NOTE When both parents are in the home, TPEP eligibility must be considered. The household may be entitled to RCA if there are any additional months of RCA remaining within the eight month timeframe.
- Unaccompanied refugee children. Payments are made to the non-relative caretaker. However, the non-relative caretaker is not included in the budgetary unit.
- Eligible refugee married to either a U.S. citizen or an ineligible refugee.
- A caretaker with unrelated dependents.

Full-time students age 19 or older in either high school or institutions of higher education are NOT eligible to receive RCA as a dependent, but are potentially eligible for RCA in their own budgetary unit.

As a condition of RCA eligibility, any refugee determined to be an RCA Job mandatory participant must register and participate with a Volunteer Agency (VOLAG). This includes RCA participants who are also receiving NA.

When an RCA Job mandatory refugee participant fails or refuses to comply with the RCA Job program requirements, the VOLAG staff will notify FAA. When the local office is notified by the VOLAG that the mandatory Job participant is noncompliant with the program, action to impose the graduated sanction, as described in HB2372, will be initiated.
Prior to imposing the graduated sanction, complete the following:

- Review the refugee's exempt or mandatory RCA Job work program participation status.
- When the participant is determined exempt, **Do NOT IMPOSE THE SANCTION.** Notify the appropriate VOLAG of the change, and document the case file thoroughly.
- When the participant is determined RCA Job mandatory, impose the sanction at the 50% sanction level, allowing for Notice of Adverse Action (NOAA).
- When the participant remains noncompliant, impose the sanction at the 100% sanction level for the following month and close the RCA case, allowing for NOAA.

**NOTE** The minimum sanction period must be applied once the NOAA has been sent.

When the action to sanction is taken, document the case file with the level of sanction imposed. The participant may agree to comply or becomes exempt from the work program during the sanction period. In this situation, the budgetary unit is eligible after serving a minimum of 30 days.

When the noncompliant participant is added back into the RCA budgetary unit, refer the participant according to procedures listed in RCA Work Program Requirements.

While a sanction for a work program noncompliance is being applied, one of the following may be discovered:

- The RCA case is closed
- The RCA case is already sanctioned (for a non-work program related reason)

When the case is closed or the case is already sanctioned for the month and the second report of noncompliance is to be effected, the following applies:

- For closed cases, cancel the report of noncompliance. Do not act on it, unless the budgetary unit reapplies before it has lost a full month of benefits for the second occurrence of noncompliance.
- For active cases, send the RRP Noncompliance Work Program (R200) notice, allowing for NOAA, notifying the participant of the noncompliance. When more than one sanction is in affect for the same month, all sanctions count toward the same disqualification period.

**WARNING**

The RCA benefit reduction must not result in an increase to NA. AZTECS continues to count the gross amount of RCA before the reduction when there is a noncompliant participant.

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**Revision Details**

The Cash and Nutrition Assistance Policy (CNAP) Manual will be updated to include the information in this Policy Change Alert. Until then, an alert will be placed in each revised section with a link to this document as a reminder of the policy change.
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POLICY REFERENCE: FAA2.N09A – Refugee Cash Assistance (RCA)

Refugees must be screened and determined INELIGIBLE for CA before they can be considered for the Refugee Cash Assistance (RCA) program. When a budgetary unit which includes a refugee is determined eligible for CA, they CANNOT be placed in the RCA program.

When refugees are Eligible for CA:
- Key EA in the CI field on IDCI
- Follow policy and keying procedures for CA cases

When refugees are INELIGIBLE for CA but eligible for RCA:
- Key RE in the CI field on IDCI
- Follow policy and keying procedures for RCA cases

A separate application must be completed for each RCA budgetary unit, regardless of the number of budgetary units living in the same residence. At RCA approval, the first day of eligibility for the refugee is the date of application.

RCA budgetary units are Basic categorically eligible for NA.

Policy and procedures regarding RCA are outlined as follows:
- RCA Noncitizen Requirements
- RCA Agency Contact
- RCA Documentation and Processing
- RCA Program Selection Requirements
- RCA Work Program Requirement
- Disqualification for Noncompliance with Work Program Requirements. (See RCA Work Program Noncompliance)
- Disqualification for Noncompliance with DCSS (See RCA DCSS Noncompliance)

POLICY REFERENCE: FAA2.N09A.01 – RCA Noncitizen Requirements

RCA is time limited to eight months from the date of the refugee's entry into the U.S. The arrival month is included in the eight month count. The RCA time period ends the first day of the ninth month after entry in the U.S.
EXCEPTION

For asylees the eight month maximum eligibility period begins from the month asylee status is granted, NOT the month of U.S. entry.

Refugees who meet both of the following are potentially eligible for RCA:

- Entered the U.S. within the last eight months
- Are ineligible for CA

WARNING

Do NOT send refugees to the RCA office when their date of entry into the U.S. has been more than 8 months.

The refugee must also meet one of the following USCIS noncitizen requirements:

- Admitted as a refugee or Amerasian under Section 207. A refugee or Amerasian and their family members who have one of the following USCIS documents:

  I-94 indicating PROCESSED FOR I-551. TEMPORARY EVIDENCE OF LAWFUL ADMISSION PERMANENT RESIDENCE. VALID UNIT DATE and authorized with one of the following:

  - For refugees, RE1, RE2, RE3, RE4, or RE5
  - For Amerasians, AM1, AM2, or AM3

  I-551 denoting adjusted refugee status with the following:

  - For refugees, RE6, RE7, RE8, RE9
  - For Amerasians, AM6, AM7, AM8

NOTE Most refugees or Amerasians are not issued the I-551 during their first year in the U.S.

- Admitted as an asylee under Section 208. For purposes of counting months of eligibility, use the date asylum was granted, NOT the date of entry into the U.S. Family members have the same entry date when the spouse and children are included on the asylee’s USCIS asylee application. Documents verifying asylee status include the following:
The USCIS Form I-94 noting Section 208 admittance and one of the following admission codes:

- AS-1
- AS-2
- AS-3
- Visa 92 (V 92)

Asylum approval letter from an USCIS Asylum Office. The date noted on the Asylum approval letter serves as the entry date.

- Admitted as parolee under Section 212. Applicants normally have an I-94 document with the words, PAROLE PURSUANT TO SECTION 212(D)(5) on the front. Refugee status is limited to parolees from either Cuba or Haiti. Cuban or Haitian parolees are not subject to the one year parole duration period

- Admitted as Cuban or Haitian entrant with an I-94 meeting one of the following conditions:

  CUBAN ENTRANT (STATUS PENDING) or HAITIAN ENTRANT (STATUS PENDING)

  States the refugee was a citizen of Cuba or Haiti and was either paroled or a voluntary deportee.

**EXCEPTION**

When the I-94 contains the words OUTSTANDING ORDER OF EXCLUSION, the Cuban or Haitian refugee is ineligible for RCA.

- Admitted as Cuban or Haitian who is the subject of a pending removal, deportation or exclusion proceeding. These USCIS forms include I-122, I-220A, I-221, I221S, I-485, I-589, or I-862.

- Admitted as an adult victim of severe forms of trafficking. Applicants must have been certified by the Office of Refugee Resettlement (ORR). Victims of severe forms of trafficking who are under 18 are eligible to the same extent as adults. Trafficking victims are persons who have been certified by the ORR to have been subjected to any of the following:

  - Commercial sex acts
  - Debt bondage
  - Involuntary servitude
  - Peonage
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The following apply to trafficking victims:

- Immigration laws do not give them refugee status.
- USCIS Arrival/Departure documents are not required.
- The Trafficking Victims Protection Act of 2000 makes victims of trafficking eligible for benefits to the same extent as refugees.

For benefit eligibility determination purposes, the ORR issues trafficking victims a certification letter.

The entry date for refugee benefit purposes is the date of certification. Place a copy of the certification letter in the case file.

**NOTE** When a participant’s present certification letter has expired, contact the ORR Trafficking Verification for assistance.

Applications received from trafficking victims must follow normal refugee procedures. **VIS** must NOT be used to confirm a trafficking victim’s eligibility. Instead, the validity of each certification must be confirmed by calling Trafficking Verification.

During the verification phone call, inform ORR of the benefits for which the applicant is applying. Use of the initial VIS verification procedures is optional. This is optional because in most instances VIS will not include these applicants due to their recent U.S. entry.

### FAA2.N09A.02 – RCA Agency Contact

Refugees entering Arizona, as a rule, first contact a Voluntary Agency (VOLAG). The VOLAG is responsible for both of the following:

- Ensuring that the refugee is aware of all available support services.
- Assisting the refugee to become self-sufficient through employment readiness and placement. Work program registration and participation is emphasized.

**Most refugees are registered and participating with a work program provider prior to their initial RCA application.**

(For a listing of VOLAGs in Arizona, See **VOLAGs**)

**Newly arrived refugees are provided reception and placement assistance by the VOLAG.**
NOTE  VOLAG Reception and Placement payments are NOT COUNTABLE as income or resources.

When VOLAG determines that a refugee may be eligible for financial assistance, VOLAG staff assist the refugee in completing the official application. All refugee related applications for FAA assistance during the refugee’s first eight months in the U.S. are processed at designated Refugee Offices.

Designated FAA staff determine the refugee applicant's CA or RCA eligibility. Refugee applications are completed as follows:

- A copy of the application is faxed by the VOLAG to the designated FAA staff to register the application and to request an interview date.
- The initial interview is completed on a daily basis at the VOLAG or at the designated FAA office. This depends on the number of refugee arrivals requesting financial assistance.
- RCA eligibility determinations must not be completed until the budgetary unit has been screened for and determined CA ineligible.

A refugee related application may be turned in at an FAA office other than a specified FAA Refugee office. When this occurs, transfer the application to the appropriate FAA Refugee office within one workday(g).

When received in Pima County route to site 285C mail drop 3348. All other counties route to site 169C mail drop 3346.

FAA2.N09A.03 – RCA Documentation and Processing

USCIS documents must be provided for each noncitizen participant. (See RCA Noncitizen Requirements) Place a copy in the case file(g).

The case file must be documented with the refugee’s following information:

- Date of entry (Use the secondary VIS verification request when the USCIS documents do not list an entry date)
- National origin
- USCIS status (refugee, asylee, parolee, Cuban, Haitian, Amerasian immigrant)
- Alien Registration Number
- The name and address of the Voluntary Agency (VOLAG) or the applicant’s sponsor. Place the VOLAG Verification Form (VVF), which is completed by the VOLAG or sponsor assisting the refugee, in the case file.
Individuals that are refugees are potentially eligible for CA or RCA. CA eligibility must be determined first. (See CA Case Participation) When CA eligibility requirements are not met, determine eligibility for RCA.

An RCA budgetary unit may consist of the following:

- Single or married refugees with no dependents.
- Refugees with their common children.

NOTE Non-refugee spouses are not eligible to be included in an RCA budgetary unit.

- Unaccompanied refugee children. Payments are made to the non-relative caretaker. However, the non-relative caretaker is not included in the budgetary unit.
- Eligible refugee married to either a U.S. citizen or an ineligible refugee.
- A caretaker with unrelated dependents.

NOTE When both parents are in the home, TPEP eligibility must be considered. The household may be entitled to RCA if there are any additional months of RCA remaining within the eight month timeframe.

At any point that potential CA eligibility exists, schedule a renewal. Determine CA eligibility from the date of the renewal application.

Full-time students age 19 or older in high school, technical trade school, or institutions of higher education are NOT eligible to receive RCA as a dependent but are potentially eligible for RCA in their own budgetary unit. Consider the following:

- Full-time attendance in an institution of higher education is defined as enrolled for twelve semester hours or 24 clock hours per week.
- Part-time students can be eligible, but are not exempt from the RCA work program requirement.

As a condition of eligibility, refugees are required to participate in available and appropriate social service programs as required by the following:

- Law
- DES
- The State Coordinator for Refugee Resettlement
The designated RCA EI is informed when the refugee fails to participate in appropriate social service programs. Refusal to comply with such requirements results in termination of RCA benefits FOR THAT PARTICIPANT after sending the appropriate notice. Impose the sanctions as described in Disqualification for Noncompliance with Work Program Requirements. (See RCA Work Program Noncompliance)

RCA applicants and participants must comply with all SSN enumeration requirements for the CA program. (See SSN Enumeration)

**WARNING**

Refugees who have social security cards marked with "Valid For Work Only With USCIS Authorization" have met the SSN enumeration requirement for participation.

The same resource criteria applies to RCA budgetary units as for any CA budgetary unit. (See CA Resource Limit)

**EXCEPTION**

Do not count the following resources toward the resource limit:

- Any property, assets, or resources that the refugees left behind in their country of origin.
- Resources of sponsors, unless the refugees are dependents of the sponsors.

Count and budget income for an RCA case using current CA policies including the Needy Family criteria. (See Earned income Overview, Needy family test, and Unearned Income Overview) RCA participants are entitled to the earnings deductions.

**EXCEPTION**

Count income of the sponsor ONLY when the refugee is a dependent of the sponsor. For budgetary units that include an eligible refugee married and living together with a person not eligible to be included in the RCA budgetary unit, complete the following:

- Allow the COE and the earned income 30% Deduction for the spouse's income.
- After allowing the earned income deductions, count half of the spouse's adjusted COUNTABLE income.
Use the appropriate CA need standard for the budgetary unit.

RCA applicants and participants are subject to the following additional CA eligibility requirements.

- Reporting changes in income, living situations, or other factors affecting eligibility. When a change in the budgetary unit's circumstances may affect the program category, this must be reported.
- Applying for other cash benefits for which the refugee may be eligible.

**NOTE** Recipients of SSI are not eligible for RCA. When a refugee begins to receive SSI while an active RCA participant, remove them from the RCA benefit following the appropriate notice requirements. (See Removing a Participant)

**FAA2.N09A.05 – RCA Work Program Requirements**

The requirement to participate in a work program applies to the RCA program. This includes RCA participants who are also receiving NA. All applicant refugees determined to be mandatory work program participants must register and participate with a Volunteer Agency (VOLAG). VOLAG registration and employment assistance is provided through the Refugee office located in Maricopa and Pima counties. (See Refugee Offices for office locations)

Screen RCA only and RCA NA budgetary units for RCA work program participation. RCA budgetary units are subject to the Jobs exemptions criteria.

Do not refer mandatory work program RCA participants to the VOLAG when the refugee can document ongoing VOLAG contact. Refer mandatory RCA participants to the VOLAG at the initial interview when they cannot document ongoing participation with a VOLAG. Refer them using the Information Request (FA-077) form. Complete as follows:

- **Key RF** in the PAR/EXEM field on WORW for all persons who are determined to be mandatory participants in the VOLAG work program. For those who are not mandatory participants in the VOLAG work program, key in the valid exemption code as identified in CA Jobs Exemptions.
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- Initiate the referral by documenting the OTHER section of the FA-077. Documentation should state VERIFICATION OF WORK PROGRAM PARTICIPATION NEEDED. CONTACT THE WORK PROGRAM OFFICE LOCATED AT... Note the actual location address of the appropriate VOLAG (See Voluntary Agencies (VOLAG))

- Give an original and one copy of the FA-077 to the PI to take to the VOLAG office. Place a copy in the case file(g).

- At the time of RCA approval, send a copy of the RCA approval notice to the appropriate VOLAG office for each budgetary unit with a mandatory VOLAG participant.

- A refugee, who is a mandatory work program participant, may obtain employment or fail to comply with work program requirements. In either of these situations, the VOLAG staff notify FAA of the change in status. When necessary, FAA staff contact VOLAG staff to discuss work program participation and case status.

FAA2.N09A.06 – RCA Work Program Noncompliance

The Volunteer Agency (VOLAG) staff notify the EI when a participant fails or refuses to comply with work program requirements. This is accomplished manually via the RCA Cash Assistance Work Program Notification. VOLAG staff make all good cause determinations and reconciliation efforts before sending notice of noncompliance to FAA. The Local Office Manager ensures that all RCA Cash Assistance Notifications are keyed into ACTS to ensure timely action.

When the local office is notified by the VOLAG that the participant is non-compliant, take action to impose the graduated sanction process. (See CA PRA Graduated Sanctions) Complete the following:

- Review the participant's exempt or mandatory Jobs participation status.

- When the participant is determined exempt, DO NOT impose the SANCTION. Notify the appropriate VOLAG of the change, and document the case file(g) thoroughly.

- When the participant is determined RCA Jobs mandatory, (See RCA Work Program Requirements) impose the 50% graduated sanction level allowing for NOAA.
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When the participant remains noncompliant, impose the 100% graduated sanction level for the following month and close the RCA allowing for NOAA.

The RCA benefit reduction must not result in an increase to NA. AZTECS continues to count the gross amount of RCA before the reduction when there is a noncompliant participant. Key the following on UNIN:

- The actual RCA payment amount as AF income next to the PI.
- The reduction amount as SA income next to the noncompliant participant. (See **SA Income**)

While a **sanction** for a work program noncompliance is being applied, one of the following may be discovered:

- The RCA case is closed.
- The RCA case is already sanctioned (for a non-work program related reason).

When the case is closed or the case is already sanctioned for the month and the second report of noncompliance is to be effected, the following applies:

- For closed cases, cancel the report of noncompliance. Do not act on it, unless the budgetary unit reapplies before it has lost a full months benefit for the second occurrence of noncompliance.
- For active cases, send the NOAA notifying the participant of the noncompliance. When more than one sanction is effected for the same month, all sanctions count toward the same disqualification period.

The minimum **sanction** period must be applied once the NOAA has been sent.

When the action is taken, document in the case file which **level of sanction is imposed**. The participant may agree to comply or becomes exempt from the work program during the sanction period. In this situation, the budgetary unit is eligible after serving a minimum of 30 days.

At reapplication, determine whether the minimum sanction period has expired as follows:

- Review DISA
- Key the end date for the month after the sanction has been served
The participant is eligible to receive RCA the first month after BOTH of the following occur:

- The minimum sanction period expires
- The participant agrees to comply

When the noncompliant participant is added back to the RCA budgetary unit, re-refer the participant according to procedures listed in RCA Work Program Requirements.