

Replacement Designee State Plan:

MISSOURI

August 15, 2019

I. ADMINISTRATION

A. Organization, 45 CFR 400.5

1. *Designate the state agency responsible for developing, administering, and supervising the State Plan or WF Program.*

The agency responsible for developing, administering and supervising the State Plan is the International Institute of St. Louis' Missouri Office of Refugee Administration (MO-ORA). The agency is the Replacement Designee for the State of Missouri.

2. *Identify the State Refugee Coordinator by title.*

Paul Costigan, the Vice President of Program Administration at International Institute of St. Louis (IISTL) is the State Refugee Coordinator (SRC) for the state of Missouri.

3. *Describe the organizational structure and functions of the state.*

MO-ORA is a separate functioning office within IISTL. As such, while considered employees of IISTL, MO-ORA staff retain their own separate identity within the larger organization. MO-ORA operates separate bank accounts from its parent organization and has fostered its own unique identity/brand. In the last quarter of FFY 2019, MO-ORA will create its own website with information relevant to its work in the state. The site will be expanded and finalized in FFY2020.

Anna Crosslin is IISTL's President and CEO, a position she has held for over forty-one (41) years. She reports directly to the Board of Directors and oversees all day-to-day functions of the agency in addition to providing community-wide leadership in the fields of immigration, immigrant rights, economic development, cross-cultural understanding and appreciation, ethnic arts and culture, and neighborhood development. She does not charge any of her time to MO-ORA.

Paul Costigan splits his time between two positions, one as the Vice President of Program Administration with IISTL and the other as State Refugee Coordinator (SRC) of Missouri's RD, MO-ORA. Paul has been with IISTL for over twenty (20) years; his role within the organization is to ensure adherence to contractual obligations as well as establish methods to measure and report on goals and indicators. He worked closely with past Missouri SRCs going back to the early 2000s.

Linda Haus, MSW is the Assistant Refugee Coordinator (ARC) of MO-ORA, working 80% FTE. She previously had the same title and similar responsibilities for approximately seven (7) years (until retirement in January 2017) under Missouri's Department of Social Services (DSS), who administered the refugee resettlement program through April 30, 2018.

The State Refugee Coordinator and Assistant Refugee Coordinator are responsible for the coordination of public and private resources in refugee resettlement in the state, according to the Refugee Act and pursuant to 45 CFR 400.301(c). The duties of the Coordinators will be:

- Prepare and submit the annual Refugee Resettlement State Plan
- Manage federal funds
- Monitor contracts
- Monitor compliance
- Track performance
- Inform local resettlement agencies on status of RCA enrollments
- Submit required reports
- Consult and coordinate with local resettlement agencies
- Consult and coordinate with USCRI (MRD) regarding RMA/RMS
- Consult and coordinate with Family Support Division (FSD) regarding TANF, SNAP, Medicaid, SCHIP and other state benefits
- Conduct quarterly planning/training/coordination meetings with Local Resettlement Agencies (LRAs), Medical Replacement Designee (MRD) and other stakeholders in the public and private sector to strengthen services to refugees

Current staffing for MO-ORA, excluding those under the Medical Replacement Designee (MRD) include:

- Carol Gaal, Manager of Grants Accounting (RD) 80% FTE – Primary responsibility is fiscal oversight, budgeting, financial reporting and contractor/recipient payment tracking.
- Sarah Masoud, Eligibility and Compliance Specialist (RD) 100% FTE – Primary responsibility is coordinating Refugee Cash Assistance (RCA), ensuring LRA compliance with RSS requirements, and assisting the local refugee agencies (LRAs) with RCA applications, enrollments and payments.
- Tamim Afghanzada, Data Support Specialist (RD) 100% FTE – Primary responsibility is ensuring data integrity and technical support of MO-ORA's state-wide database system and working with LRAs to establish reporting systems and to ensure timely and accurate reporting.
- Part-time shared staff (RD) – Other staff within IISTL whose duties include: executing payments to RCA recipients, contractors, and other related payables/receivables duties; technology support related to system upgrades, web site development, reception, operations and other areas as needed.

Wilson-Fish Addendum

1. Provide a brief history of the WF program.

In November 2017, the State of Missouri and specifically the MO Department of Social Services (DSS) notified ORR of its intention to leave administration of the state refugee program. In 2018, the International Institute of St. Louis with the

support of the other 4 LRAs in Missouri, submitted a state plan to ORR to become the state's Replacement Designee (RD). In May 2018, a division within the International Institute entitled the Missouri Office of Refugee Administration or MO-ORA was born to carry out the work of the state plan. It began issuing RCA checks that same month and contracted with all 5 LRAs to provide RCMA services as well as RSS and SOR.

In 2019, MO-ORA increased the RCA amount from the \$136 per month carried over from the state to the current \$200 per month. MO-ORA also successfully implemented a Youth Mentoring program and began monitoring agencies with which it had sub-recipient relationships. Also in 2019, MO-ORA embarked on a process by which it would create a statewide database in order to collect, aggregate and report ORR required data.

2. Describe the precise location of the WF program and boundaries of the service area.

The program encompasses the entire state of Missouri, the 21st largest in the US in size and 18th largest in population. The state has been divided up into 4 regions for administrative purposes by MO-ORA, each of which represented by one or more LRAs. The LRA in Region I is the International Institute of St. Louis, Region II the International Institute of Southwest Missouri, Region III Jewish Vocational Service and Della Lamb Community Services in Kansas City and Region IV Refugee and Immigration Services of Columbia.

Because Kansas City, as a major metropolitan area located in both Missouri and Kansas, has refugee populations on each side, the SRCs in Kansas and Missouri have had discussions on areas of collaboration and possible joint activities serving both states.

4. Assure that the WF agency has a written code of conduct to ensure that administrative decisions, including the monitoring of a provider that is part of the same 501(c)(3) organizational structure as the WF agency, do not result in a conflict of interest that unduly benefits the WF agency.

MO-ORA has and adheres to a written code of conduct to ensure that administrative decisions do not result in a conflict of interest that unduly benefits the RD's head agency. In addition, MO-ORA has developed a tool entitled *Procedures for Monitoring IISTL and IISMO* which also outlines the process for monitoring IISTL and IISMO.

5. Describe program and fiscal oversight for the overall WF program and individual components, including oversight of sub-grantees.

The purpose of monitoring is to ensure federal funds are used for authorized purposes in compliance with federal program laws, regulations, and grant agreement terms and conditions, and that performance goals are achieved. Programmatic

compliance is determined by evaluating a project's technical progress toward stated goals and objectives as outlined in federal program laws and regulations. Financial compliance is determined by evaluating the manner in which federal funds are expended, allocated and reported.

MO-ORA will monitor LRAs on site, monitor subcontracts for compliance, assist LRAs in setting up and maintaining systems which allow them to track measures and performance and to submit the required reports pursuant to 45 CFR 400.28. MO-ORA has selected and is developing data management systems which will allow gathering and aggregation of information and data on services provided to refugees under RCA, Refugee Support Services, Refugee School Impact, Services to Older Refugees, Youth Mentoring and any other set-asides.

MO-ORA will follow-up with LRAs and Missouri Department of Elementary and Secondary Education (DESE, who subcontracts to provide services under Refugee School Impact) on reporting they are required to submit, based on their subcontracts and directives from the Office of Refugee Resettlement (ORR), such as the ORR-6, ORR-2, and ORR-5. Follow-up will entail clearing up any perceived inconsistencies or items that appear to be out of compliance and providing training for areas of common concern. The SRC will also quickly disseminate information and policies that emerge from ORR to LRAs. This may include technical assistance training for LRAs and community partners on subjects essential to providing assistance and services.

MO-ORA will also monitor the performance of the cooperative agreement and subcontract activities and review each program function to assure that adequate progress is being made toward achieving programmatic goals and compliance with federal regulations. MO-ORA monitor LRAs to ensure that refugees are enrolled in RCA, RMA and other services for which they are eligible in a timely manner.

MO-ORA will prepare monitoring reports which shall include findings for any perceived non-compliance with any fiscal and/or program components. Subcontractors will respond with their proposed corrective actions to resolve any such findings. Follow-ups on those recommendations shall be filed at the MO-ORA office. Monitoring reports will be included in the ORR-6 submission and provided to ORR upon request. USCRI will have responsibility for reporting on oversight of RMA and RMS.

B. Assurances

MO-ORA and IISTL understands and assures it will:

1. Comply with the provisions of Title IV, Chapter 2 of the Immigration and Nationality Act (8 U.S.C. § 1522), and official issuances of the Director.
2. Meet the requirements in 45 CFR Part 400.
3. Comply with all other applicable federal statutes and regulations in effect during the time that it is receiving grant funding.
4. Amend the State Plan to comply with ORR standards, goals, and priorities established by the Director, as needed.

5. Provide services to all refugees and other ORR-served populations without regard to race, religion, nationality, sex, or political opinion.
6. Convene planning meetings of public and private sector stakeholders at least quarterly, unless exempted by ORR.
7. Provide all ORR-eligible populations with the benefits and services described in the State Plan.
8. Have and adhere to a policy for resolving disputes between the RD's organization, sub-grantees, and/or clients in a transparent and equitable manner.

II. ASSISTANCE AND SERVICES

Wilson-Fish Addendum

1. Describe how activities will be coordinated among resettlement agencies, state and county agencies, and service providers in the community.

MO-ORA has developed working relationships with all 5 of Missouri's LRAs, providing on-site trainings, web-based trainings and communications, and meetings during quarterly refugee meetings to discuss the progress of the statewide program.

Besides quarterly refugee meetings involving MO-ORA (RD and MRD), state agencies, and local services providers and community partners MO-ORA has initiated and will continue to provide the following as part of our communication plan:

- Weekly Update– A weekly update newsletter sent to the LRAs and a variety of community partners, to communicate up-to-date changes, policies and/or news related to RCMA, RSS and other set-asides or other general refugee-related services and policies.
- SharePoint – A SharePoint site, where every LRA has its own protected site as well as a shared resource site. Each protected site allows LRAs to send in their monthly reports and have access to MO-ORA originated forms with their agency letterhead. The Resource site contains shared forms, training guides, and training videos that may be accessed by all LRA staff.
- Training videos – Short (less than ten minutes) videos are produced that explain how to use various forms or perform various procedures. These are uploaded to the Resources SharePoint site and their availability (as produced) are mentioned in the Weekly Update.
- On-site training – On-site training takes place, focusing on areas of concern defined by the RCA application process as well as per request of the LRAs. Survey Monkeys are generated to assist in areas of concern noted by the agencies.

With the advent of the statewide database in early FY2020, additional trainings will be conducted for staff at the LRAs. Some will be on-site, while others will be during the quarterly meetings and electronically as needed.

MO-ORA is often times the go-between among refugee serving community partners. We continue to position ourselves as The refugee resource in the state where organizations and partners can turn for information, networking and assistance.

All the above-mentioned services and strategies will be utilized to ensure ORR-served populations have access to appropriate services and support.

2. Describe how ORR-eligible populations residing in the project area will have appropriate access to ORR-funded cash assistance and services.

Both MO-ORA and USCRI have provided and continue to provide training on Refugee Cash Assistance (RCA), Refugee Medical Assistance (RMA) and additional ORR-funded programs and services.

The LRAs are aware of their responsibilities for providing services leading to self-sufficiency, such as assessment, English Language Learning (ELL), employability training, on-the-job training and other supportive services. LRAs also communicate monthly with MO-ORA on the employment status of individuals; this information is also shared with USCRI to determine continued eligibility as well as potential alternative methods of health insurance availability.

MO-ORA ensures that refugees are eligible to receive employment services for up to sixty (60) months, contracting with LRAs across the state to provide the following employability services, utilizing funding through Refugee Cash Assistance and Refugee Support Services and Services to Older Refugees pursuant to 45 CFR 400.75, .154 and .155:

- Employment services
- Employability assessment services
- On-the-job training
- English language instruction
- Vocational training
- Skills recertification
- Daycare
- Transportation
- Translation and interpreter services
- Case management services
- Assistance in obtaining an Employment Authorization Document (EAD)
- Other services as needed to achieve and maintain economic self-sufficiency of the client when these services are not available from any other funding source

Citizenship, naturalization services and referral and interpreter services can be provided to refugees for more than 60 months after arrival or until they become citizens pursuant to 45 CFR 400.152(b). In addition, MO-ORA assures Limited English Proficient (LEP) persons

will have meaningful access to benefits and services. LRAs are contractually required to provide adequate language access and language support to their program participants. To help support and enforce this access, the subcontract for RCA eligibility determinations includes funds to provide interpretation while engaging RCA participants.

As a condition to receive RCA, employable refugees must register with a designated service provider (in most cases, their local LRA) or a Missouri Job Center in their area within the first thirty days of receipt of cash assistance, thereby ensuring the development of an employability plan by the service provider pursuant to 45 CFR 400.75. LRAs are required to maintain information in the case file on the entity that will be providing the employability and employment services to each RCA participant, whether the LRA itself, a branch of the Missouri Career Center or some other third-party entity.

The employability plan for each employable client must be designated to lead to the earliest appropriate employment. It must contain a definite employment goal, attainable in the shortest time period consistent with the employability of the refugee in relation to job openings in the area pursuant to 45 CFR 400.79(c). Failure or refusal to accept employability services or employment may result in sanctions which would cause a loss of benefits pursuant to 45 CFR 400.82.

3. Describe how ORR-eligible populations will have access to other programs in the community, such as child care services, senior services, and other support programs for working families and individuals.

In addition to the support services described above, LRAs refer refugees to other agencies for services either not directly provided by the LRA or as a supplemental service to enhance those provided by the LRA. LRAs will continue to assist refugees in applying for services at agencies such as: Missouri Department of Social Services – Temporary Assistance for Needy Families (TANF), MO HealthNet (Medicaid), SNAP (Food Stamps), Childcare and Nursing Home Assistance; Area Agencies on Aging – Senior services such as legal services, nutrition, in-home services, health promotion, transportation and tax counseling; Community Action agencies – Low Income Home Energy Assistance Program (LIHEAP), employment services, back-to-school fairs, women’s health clinics; local service providers – English Language learning, tutoring, food pantries, hospitals and clinics, transportation services, housing assistance, etc.

All of the LRAs in Missouri have developed a complex network of community partners who recognize the specific needs of those agencies’ clients. Caseworkers are knowledgeable about the resources available in their communities and regularly make referrals to those resources. Community partners know how to request and use interpretation when needed by the client. All LRAs are encouraged to broaden their resource network even further to meet the complex needs of refugee families

A. Describe how the state agency will coordinate Cash and Medical Assistance (CMA) with support services to promote employment and encourage economic self-sufficiency for ORR-eligible populations.

All refugees who apply for any services at a Local Resettlement Agency (LRA) are encouraged to enroll in additional support services to assist in becoming economically self-sufficient. Refugees who apply for, or receive Refugee Cash Assistance (RCA), are required to register for employment services and must accept appropriate employment, training, and/or language training, unless otherwise exempt. LRA staff will assist RCA applicants in determining if one of the exemptions is met and provide potentially exempt applicants the opportunity to participate in Employment and Training (E&T) activities.

Subcontractors will coordinate CMA applicants and recipients (whether mandatory participation in Employment and Training) the following supportive services that promote and encourage economic self-sufficiency:

- a) Employment services included but not limited to the development of an Individual Employment Plan (IEP) for each employable family member and/or Employment Services Plan (ESP) which leads a client to the earliest possible employment as well as job development, job counseling, direct job placement and follow-up;
- b) Employability services including an assessment of overall eligibility for services, past work history and education and designed to assist a client in overcoming obstacles to employment such as transportation, childcare and health issues;
- c) On the job training including provisions for skills training at a job site with the intent of future full-time, permanent employment;
- d) English Language Training (ELT) with emphasis as it relates to obtaining and retaining a job and completing employment applications;
- e) Vocational training which provides job specific skills and offered either in-house or by a local vocational training provider;
- f) Skills recertification, if appropriate;
- g) Case management and referral to additional services and the tracking of those services;
- h) Other employability services including childcare, transportation, translation and interpretation and assistance in obtaining an Employment Authorization Documents (EAD).

These services may be performed individually or in a classroom setting. Some services may be performed by community groups or volunteers, such as for ELT, interview practice or skills training. LRAs have the flexibility to design these services based on local conditions which best meets the needs of the clients and fulfills the LRA's responsibility to enable employment and early self-sufficiency.

B. *Describe how the state or WF agency will ensure that language training and employment services are made available to ORR-eligible populations receiving cash assistance, including efforts to actively encourage registration for employment services.*

The LRA subcontractors are required to provide employment services that consist of development of an ESP and/or IEP that addresses the employment-related service needs of the employable members of a family for the purpose of enabling the family to become self-supporting through the employment of one or more family members.

Subcontractors are required to report to MO-ORA the job placements made each month as well as the results of a 90-day employment follow up. Additionally, the subcontractors are required to complete and submit to MO-ORA ORR-6 reports indicating the provision of social services outlined above.

C. Refugee Cash Assistance (RCA). 45 CFR 400 subpart E

- 1. Indicate whether RCA is publicly administered or is administered through a public/private partnership (PPP) or WF program. If RCA is administered differently across the state, list the locations that are publicly administered and list the locations that are administered under the PPP program.**

RCA is administered through a private 501(c)(3) agency, the International Institute of St. Louis as the Replacement Designee. MO-ORA, an office within the International Institute subcontracts with the 5 LRAs in the state to provide RCA services to their eligible clients.

- 2. Describe how the state or WF agency will ensure that participants in the RCA program are informed about the program in a language they understand in accordance with 45 CFR 400.55.**

The RCA Application and the Rights and Responsibility Forms each have a check box where the LRA representative indicates that the applicant(s) have had the information explained in the language of the applicants' choice. Additionally, these forms are replicated in the top five languages spoken by Missouri's most recent populations. MO-ORA will translate these documents in additional languages as becomes necessary.

LRAs have received training in the use of these forms and the need for them to be explained in the language of the applicants' choice. Instructions for filling out these forms are also included in the RCA Manual developed for and used by all LRAs. LRAs in Missouri are familiar with this, and subcontracts include translation and interpretation as necessary provisions for RCA and RMA applications and continued case management.

- 3. Provide an assurance that the state agency will follow the mediation and fair hearing standards and procedures outlined at 45 CFR 400.83.**

MO-ORA and IISTL understands and assures it will follow the mediation and fair hearing standards and procedures outlined at 45 CFR 400.83.

- 4. Describe the criteria for an exemption from registration for employment services, participation in employability service programs, and acceptance of appropriate offers of employment.**

Exemptions from Registrations for Employment Services – Refugees who apply for, or receive Refugee Cash Assistance (RCA), are required to register for employment services and must accept appropriate employment, training, and/or language training opportunity, unless otherwise exempt. LRA staff will assist RCA applicants in determining if one of the exemptions is met and provide potentially exempt applicants the opportunity to volunteer for Employment and Training (E&T) activities. Following are exemptions for this requirement (listed on the RCA Application):

- A person who is attending full-time training, not including higher education.
- Parent or other relative of a child under the age of 6 who is caring for the child.
- Aged 60 or over.
- In third trimester of pregnancy. – Accept the applicant’s statement and reasonable flexibility for due date determination.
- A person who has an illness or incapacity which prevents working:
 - For illnesses/incapacities of expected short-term duration: Accept the applicant’s statement, but this is considered a temporary exemption. The resettlement agency must re-evaluate at least no later than three (3) months after initial application to determine E&T status. Update information sent to the MO-ORA Eligibility and Compliance Specialist regarding exempt status changes.
 - For illness/incapacity expected to be longer than three (3) months duration: Explain to the applicant general disability parameters in the U.S. For applicants who demonstrate a longer-term illness/incapacity, the participant must apply for Supplemental Security Income (SSI) and MO HealthNet for the Aged, Blind and Disabled (MHABD). Individuals may receive RCA until either an SSI claim is approved, or until the 8-month period of eligibility expires, whichever comes first. If SSI and MHABD are denied, based on a determination of not disabled, the individual will be required to participate in E&T.
 - A person who is required in the home because of illness or incapacity of another household member. For individuals who are required in the home to take care of another who has an obvious illness or incapacity, accept applicant’s statement. For those applicants stating they are needed in the home for conditions not necessarily requiring assistance, explain the need to participate in E&T, and if some later date a physician determines they are needed in the home, the possible exemption will be re-evaluated.
- Parent or caretaker of a child, when another parent or other adult relative in the home is deemed mandatory for TANF and/or RCA worker requirements; is cooperating with their E&T requirements; and, has not refused to accept employment, unless there is good cause.

NOTE: The inability to communicate in English is not an exemption reason.

Those determined exempt from participation in E&T must continue to maintain correspondence with their RCA case worker. All RCA recipients, regardless of E&T status (mandatory, volunteer, exempt), will meet with either their RCA case worker and/or LRA representative monthly to receive their RCA payment, update their current progress and connect with additional supportive services needed to attain or retain employment.

Participation in Employability Service Programs – Refugees required to register for E&T services must register with either a local resettlement agency (LRA) receiving RCA and/or Refugee Support Services (RSS) funds or the local Missouri Workforce Development Job Center. Most refugees are expected to work with the LRA who provides their Reception and Placement Services. There may be some refugees who reside in areas far from an LRA, and who could then work with local Job Centers to meet their E&T requirements. The LRA representative notes where the participant will participate in mandatory E&T services on the RCA Application, and makes appropriate referrals.

Acceptance of Appropriate Offers of Employment – RCA recipients are generally required to participate in employment activities or accept employment. RCA participants are only required to participate in employment activities that meet the following standards (NOTE: these are federally required standards):

- The work must be related to the physical and mental capability of the individual to perform the task on a regular basis. Substantiate any claim of adverse effect on an individual's physical or mental health by adequate medical statements.
- The commuting time to and from home to the work site should not normally exceed two hours (this does not include the time it takes to transport a child to and from a child care facility) unless a longer commuting distance and time is generally accepted in the community, in which case the round-trip commuting time shall not exceed the generally accepted community standards.
- The work or training site must not be in violation of applicable Federal, State, and local health and safety standards.
- The work or training assignment is not discriminatory in terms of age, sex, race, creed, color, or national origin.
- The wage should meet or exceed the Federal or State minimum wage law, whichever is applicable, or if such laws are not applicable, the wage should not be substantially less than the wage normally paid for similar work in that labor market, but in no event shall it be less than three-fourths of the minimum wage rate.
- The daily and weekly hours of work do not exceed those customary to the occupation.
- No individual is required to accept employment if:
 - The position offered is vacant due to strike, lockout, or other bona fide labor dispute.

- The individual is required to work for an employer contrary to the conditions of his existing membership in the union governing that occupation. Employment not governed by the rules of a union in which he has membership may be deemed appropriate.
- The job offered interrupts full-time training that is intended to have a definite short-term (less than one year) employment objective.

7. Eligibility and Payment Levels. 45 CFR 400.50 and 400.60

- a) Describe how the state will determine initial and on-going eligibility for RCA. Indicate the income eligibility standard established by the state after consultation with local resettlement agencies in the state.**

Determining Initial and On-going Eligibility for RCA

Individuals and families defined as refugees will arrive at a local refugee agency (LRA) one of several ways, the most common being:

- New arrivals – Refugees and SIV’s coming to the LRA directly from an overseas refugee camp or on a self-paid flight, once status is approved.
- Secondary migrants – Refugees and SIV’s coming to the LRA after having initially come to the U.S. and settled in a state other than Missouri.
- New status holders – Individuals and/or families recently approved as Cuban/Haitian Entrants, asylees, parolees and trafficking victims that may have been in the U.S. prior to being approved for one of these categories.

An LRA intake worker reviews the refugee household composition, determining if any household members may be eligible for RCA. Assistance in determining potential eligibility for various programs, including RCA and RMA, are available in MO-ORA’s RCA Manual.

The RD receives all initial eligibility applications for RCA from the LRAs, completes the final eligibility determination, and informs the LRAs of the approval/non-approval for the clients’ enrollment. LRA must meet with their RCA recipients a minimum of once a month, updating the individual employability plans to note progress and to adjust steps necessary to meet the goal of self-sufficiency. Any health concerns or issues hindering goals are transmitted to USCRI for assistance.

LRA intake workers will continue to refer or assist refugees in applying for programs such as TANF, Food Stamps (SNAP) and MO HealthNet through the Department of Social Services. However, for those determined potentially eligible for RCA, the LRA intake worker must have the RCA applicant fill out and sign various documents, and the intake worker must submit specific forms to MO-ORA for final eligibility approval, as well as initiate an Employment and Training (E&T) referral to the appropriate facility or agency department.

LRA’s must provide a listing at the end of every month for those RCA individuals and/or households that are to receive RCA benefits the following month.

Income Eligibility Standard

- Earned income, after applying a \$90 standard work exemption and a three-fourths earned income disregard, cannot exceed the amounts shown in item 7b) below. This formula has been discussed with and agreed to by the state’s LRAs.

b) Provide the RCA payment standard for case sizes 1 – 5.

Case Size	1	2	3	4	5
RCA	\$200	\$400	\$500	\$600	\$700*

*For RCA case sizes above 5, add \$70 for each additional member.

c) Provide an assurance that the state will follow requirements related to financial eligibility and consideration of resources and income as outlined at 45 CFR 400.59.

MO-ORA understands and assures that it:

- Will not consider resources remaining in the applicant’s country of origin (45 CFR 400.59(b)).
- Will not consider a sponsor's income and resources to be accessible to a refugee solely because the person is serving as a sponsor (45 CFR 400.59(c)).
- Will not consider any cash grant received by the applicant under the Department of State or Department of Justice Reception and Placement program (45 CFR 400.59(d)).

d) Indicate if the PPP program provides any type of differentials or incentive payments. Describe types and levels of incentive payments.

RCA recipients who report earned income in a timely manner are eligible to receive the following:

- Earned income disregards – Deductions from earned income are allowed when calculating the RCA benefit, and are applied in the following order:
 - Standard work exemption of \$90
 - Earned income disregard –Three-fourths (3/4) of the remaining earned income is disregarded.
- Employment notification incentives – Gift cards in an amount not to exceed \$50 per month will be provided to RCA recipients after reporting employment. Gift cards are intended to assist with work-related expenses.

- Employment bonuses – RCA recipients will be eligible for direct pay employment bonuses once their RCA has been closed for two months due to employment income. Eligible families would receive a bonus equal to two months of full RCA benefits, as long as there are two months of the 8-month eligibility remaining.

e) Describe how will the state will stay within prescribed assistance and budget levels.

MO-ORA has developed budget forms for LRAs to assist in determining the correct amount of assistance an RCA recipient may receive. Assistance and budget levels are reviewed and authorized as follows, to assure fiscal accuracy:

- 1) LRAs fill out the budget form and submit it, along with the RCA Application, for approval and authorization by MO-ORA. MO-ORA reviews both forms to assure assistance grouping is correct and the initial payment, as well as following month's payment, is determined correctly. MO-ORA approves the RCA budget and issues payment if correct, or if the application has errors, requests a corrected resubmission by the LRA.
- 2) LRAs submit additional budget forms for changes to the initial approved payment amount if changes occur, such as employment or household composition. Budget adjustments are reviewed in the same way as an initial application.
- 3) LRAs submit a Monthly Payment Listing (MPL) at the end of each month for the following month's payments to RCA recipients. The MPL is reviewed for accuracy prior to payments being issued.

8. RCA Program Administration. 45 CFR 400.13

a) Indicate which agency is responsible for RCA eligibility.

Both the RCA applicant's LRA and MO-ORA are responsible for determining RCA eligibility. The steps for final approval are as follows:

- 1) The LRA fills out the completed forms identified below (after reviewing for RCA eligibility based on immigrant status, income need, time limitations, resources and assistance grouping) and sends these to MO-ORA for final approval of initial eligibility:
 - RCA Application
 - RCA Budget Form
- 2) MO-ORA reviews the information and either:
 - Sends back an approval letter, or
 - Contacts the LRA for further information before making a final determination of eligibility.
- 3) The LRA mails the RCA applicant/recipient a copy of the approval letter.

b) Describe the WF program’s policy and procedures regarding the beginning of RCA eligibility, the timing of RCA payments throughout the client’s eligibility period, and the (optional) use of proration.

Beginning of RCA Eligibility

Eligibility determinations must be made as promptly as possible and no more than thirty (30) calendar days from the date of application:

1. The date of application is the date that RCA begins instead of the date of entering the country. Eligibility determination is based on a refugee applicant's income and resources on the date of application, rather than averaging income over the application processing period.
2. The eight-month period includes the month of entry in the U.S. or the month status was attained as the first month.
3. The initial month of RCA is based on the date of application

Timing of RCA Payments

Initial payment – The initial RCA payment should be received within 15 days of the approval.

On-going monthly payments – On-going RCA payments will be received no later than the 15th of the month.

Proration

Although in the past the State of Missouri prorated the amount of the initial RCA payment based on the date of application, MO-ORA has decided *not* to pro-rate the first month and instead give the case the full month’s amount of \$200. This will alleviate possible reckoning and accounting errors and ideally start the case more quickly on the road to self-sufficiency.

c) Indicate which agency is responsible for distributing RCA benefits.

Both the RCA applicant’s LRA and MO-ORA are responsible for distributing RCA benefits. MO-ORA’s approval notice starts the process of RCA payment to the client. The steps for benefit distribution are below:

- 1) Initial RCA payment creation – After MO-ORA approves the RCA payment, a check is created by MO-ORA in the amount of the first month of eligibility, payable to the RCA head of household as defined by the LRA.
- 2) Receipt of initial RCA payment – MO-ORA mails the initial RCA payment for the RCA household to the LRA. The initial RCA payment should be received by the LRA within 15 days of the approval. The LRAs will hold any check(s) received in a secure site, until the recipient comes to pick it up.
- 3) Disbursement of initial RCA payment – The RCA recipient(s) comes in to the LRA to pick up their RCA payment/benefit. The LRA must meet with the recipient(s) to receive an update on any information regarding their progress with E&T or any other appropriate updates. The RCA Head of

Household (HoH) and the LRA representative must both sign an RCA Monthly Payment Record.

- 4) Notice of monthly RCA payments – On the 30th of each month, LRAs submit the RCA Payment List, as well as copies of the signed individual RCA Monthly Payment Record for each individual/household listed to receive RCA benefits the following month. The form indicates the amount of payment, and if a change in the benefit amount occurs, a budget adjustment must also be provided.
- 5) Receipt of subsequent monthly RCA payments – MO-ORA mails the monthly RCA benefit payments to the LRA within the first full week of the month the payment is to be received. The payments should be available for disbursement no later than the 15th of the month.

d) Describe how staff is allocated between TANF and RCA at the state level.

TANF is a program administered by the State of Missouri's Department of Social Services (MO DSS). Prior to May 1, 2018, the Refugee Resettlement program (including RCA and RMA) were also administered by MO DSS, who subsequently released responsibility for the Refugee Resettlement Program in its entirety. Neither MO DSS nor MO-ORA allocates staff between the agencies for TANF and/or RCA.

e) Describe how many full-time equivalents are allocated to RCA administration for RCA distribution.

MO-ORA has one staff member (1 FTE) who is responsible for eligibility and compliance for RCA. Because MO-ORA subcontracts with the LRAs to do initial RCA assessment, applications and distribution, they are responsible for having staff members assigned to these duties, e.g. RCA Caseworker. MO-ORA is in continuous contact with those staff members and verifies the activities of the RCA staff through reporting and on-site monitoring.

f) If the state is charging CMA an indirect cost rate, describe the rate charged and if HHS is the cognizant agency.

MO-ORA charges the de minimis 10% indirect cost rate to its administration, program coordination and planning. Neither MO-ORA nor its parent organization IISTL has a federally negotiated indirect cost rate.

D. Refugee Medical Assistance (RMA), 45 CFR 400 Subpart G

1. Describe the process for determining eligibility for Medicaid and CHIP.

A refugee case must be determined to be ineligible for Medicaid and SCHIP prior to enrollment in RMA. For individuals and/or families determined eligible for MO HealthNet, the LRAs assist them in filling out and submitting the appropriate applications. LRAs have previously been given training by DSS staff that outlined eligibility guidelines for MO HealthNet (Missouri's Medicaid and SCHIP programs) to enable correct referrals and applications to the organization.

Since the transition of administration of the refugee resettlement program, MO-ORA has provided additional on-site training to LRAs to enable them to determine benefits the applicant(s) may be eligible for, including MO HealthNet. Two PowerPoints have been developed and are accessible to the LRAs on SharePoint, and an RCA Manual has been produced and is available that provides flow charts illustrating eligibility points.

Factors that determine eligibility for MO HealthNet include: family composition (singles, minor children, adult children, etc.); age of children and/or adults; income (including any income from a previously resettled spouse who is working); immigration status; disability status; and, date of eligibility/arrival/status approval.

- 2. Provide assurance that the RD will subcontract with local resettlement agencies for initial RMA eligibility determinations and monitor subcontract activities to ensure adherence with federal and MRD RMA policies and procedures.***

MO-ORA understands and assures that it has and will continue to subcontract with LRAs to provide initial RMA eligibility determinations and will monitor subcontract activities to ensure adherence with federal and USCRI's (MRD) RMA policies and procedures.

- 3. Provide an assurance that the RD will coordinate with the MRD regarding RMA policies and procedures to ensure refugees are enrolled in RMA in a timely manner including establishing a process to identify refugees who are categorically ineligible for Medicaid.***

MO-ORA understands and assures that it will coordinate with USCRI regarding RMA policies and procedures to ensure refugees are enrolled in RMA in a timely manner including establishing a process to identify refugees who are categorically ineligible for Medicaid.

- 4. Provide assurance that RMA eligibility determination will be conducted in accordance with 45 CFR 400.100 to 400.104, as applicable, and Policy Letter #16-01.***

MO-ORA understands and assures that RMA eligibility determination will be conducted in accordance with 45 CFR 400.100 to 400.104, as applicable, and Policy Letter #16-01.

E. Refugee Medical Screening (RMS). 45 CFR 400.107

This section will be responded to by USCRI MRD.

F. Refugee Support Services (RSS)

- 1. Describe if the state or WF program provides social services as outlined at 45 CFR 400.154 and 400.155.***

MO-ORA continues to subcontract with LRAs throughout the state of Missouri to provide support services to refugees and other ORR-eligible populations under the Refugee Support Services program.

2. Indicate if the social services described are consistent with 45 CRF 400.154 and 400.155.

Subcontractors may provide the following employability services as noted in 45 CFR 400.154:

- a) Employment services included but are not limited to the development of an Individual Employment Plan (IEP) for each employable family member and/or Employment Services Plan (ESP) which leads a client to the earliest possible employment as well as job development, job counseling, direct job placement and follow-up,
- b) Employability services including an assessment of overall eligibility for services, past work history and education and designed to assist a client in overcoming obstacles to employment such as transportation, childcare and health issues,
- c) On the job training including provisions for skills training at a job site with the intent of future full-time, permanent employment,
- d) English Language Training (ELT) with emphasis as it relates to obtaining and retaining a job and completing employment applications,
- e) Vocational training which provides job specific skills and offered either in-house or by a local vocational training provider,
- f) Skills recertification, if appropriate,
- g) Case management and referral to additional services and the progress and tracking of those services,
- h) Other employability services including childcare, transportation, translation and interpretation and assistance in obtaining an Employment Authorization Documents (EAD).

These services may be performed individually or in a classroom setting. Some services may be performed by community groups or volunteers, such as for ELT, interview practice or skills training. LRAs have the flexibility to design these services based on local conditions that best meets the needs of the clients and fulfills the LRA's responsibility to enable employment and early self-sufficiency.

The subcontractors are required to provide employment services that consist of development of an ESP and/or IEP that addresses the employment-related services needs of the employable members of a family for the purpose of enabling the family to become self-supporting through the employment of one or more family members.

Subcontractors are required to report to the RD the job placements made each month as well as the results of a 90-day follow up. Additionally, the subcontractors are required to complete and submit to the RD ORR-6 reports indicating the provision of social services outlined above.

3. If the state or WF agency receives RSS set-aside funding for specific services or populations, describe the target population(s) and services. Describe how these set-aside services complement services provided under RSS base funding.

MO-ORA receives set-aside funding for Services to Older Refugees, Youth Mentoring and Refugee School Impact.

Services to Older Refugees

The primary goal of the Services to Older Refugees (SOR) program is to help senior refugees (60 years and older) in Missouri to live independently and to have opportunities to contribute to their communities. The program meets the needs of refugee seniors through case management, citizenship support, and healthy social activities. It works closely with the Area Agencies on Aging to help older refugees access mainstream senior services. Currently 3 LRAs in Missouri subcontract to provide SOR services.

LRAs subcontracted to implement this program may provide one or more of the following services:

- Referrals and follow-ups to senior centers
- Enrollment in nutritional services programs
- Outreach to inform elderly refugees of the existence of services in their community
- Transportation services
- Case Management
- Home care and/or adult day care
- Elder Abuse prevention programs
- Legal Services
- Nursing home ombudsman services
- Respite care
- Housekeeping and other chore services.

SOR services complement RSS services in that the combination of both programs and their services allow for a holistic approach to family and system supports for those refugees that arrive in multi-generational family units, or those that have aging parents arrive later. Also, many SOR clients may wish or even need to expand their experiential learning (as well as contribute economically to the household) by utilizing employment supports offered under RSS.

Youth Mentoring

Youth Mentoring (YM) programs operate among four LRAs in Missouri, one each in Springfield, Kansas City, Columbia and St. Louis. Programs are for ORR eligible individual youth aged 15-24.

The YM program's goals are to: 1) promote positive civic and social engagement and 2) support individual educational and vocational advancement. To accomplish these goals, grantees will match eligible youth with positive adult mentors who will provide the youth with personalized interaction. Grantees will also provide case management to support educational and career development.

As part of the YM program, subcontractors are required to:

- Perform an initial assessment of the needs and goals of the youth and develop a plan to meet those needs through educational, vocational, and social activities.
- Provide case management that includes documenting services provided and the progress of each youth toward meeting the youth's needs and goals.
- Recruit and train mentors on how to support refugee youth.
- Screen and vet potential mentors to see if the person has a criminal history or a history of child abuse.

Subcontractors may also develop an incentive program that encourages youth to participate in the YM program. Incentives may include but are not limited paying registration fees or tuition costs for educational, vocational, apprenticeships, and career development activities or providing donated goods such as computers. If a subcontractor chooses to establish an incentive program, the subcontractor must document the policy and ensure the program is implemented in a fair and consistent way.

Activities under the YM program focus around the following areas.

- Development of social and life skills.
- Helping youth to navigate American culture while maintaining and celebrating the youth's cultural heritage.
- Providing opportunities for social engagement with peers.
- Providing information about opportunities to participate in civic and community services activities.
- Supporting youth in learning English, math, and other skills.
- Providing academic support, such as helping with homework, and assisting with transitions in school such as the transition between middle school and high school or high school to post-secondary education.
- Helping youth with career development including skill building, resume drafting, worker's rights, and training opportunities.
- Supporting youth in developing health and financial literacy.

Youth Mentoring services complement RSS services in much the same way SOR and RSI services do, in that the combination of the programs and their services allow for a holistic approach to family and system supports. Refugee parents and their children are both focusing on areas to assist them in acculturation and language learning, and families can help each other out in their educational and career development endeavors.

Refugee School Impact

The Refugee School Impact (RSI) grant will continue to be administered through the Missouri Department of Elementary and Secondary Education (DESE) by means of a Memorandum of Understanding arrangement. MO-ORA actively consults with DESE to ensure the proper provision of RSI services across the state.

The goals of the program include:

- Effective planning and successful program implementation focused on newly arriving ORR served youth through partnerships with state school officials, LRAs, health and mental health providers and community and faith-based organizations and others.
- Development of culturally and linguistically appropriate materials.
- Flexible scheduling such as after school classes, weekend tutorials and online assistance.
- Specialized approaches such as cultural orientation, refugee parents/teacher meetings and school orientation.
- Development of programming that supports integration of ORR-served youth into school systems such as ELT, mentoring, group activities and support of LGBT youth.
- Attention to measurable academic performance including high school graduation rates and improved academic performance.

RSI services complement RSS services in much the same way SOR services do, in that the combination of both programs and their services allow for a holistic approach to family and system supports. Refugee parents and their children are both focusing on areas to assist them in acculturation and language learning, and families can help each other out in their educational endeavors. Teenagers aged sixteen (16) and over in RSI may also wish to participate in RSS employment activities, increasing their abilities by utilizing their new skills and knowledge in practical application.