

FY 2024 State Plan – Missouri

Changes from the FY 2023 Plan marked in gray

I. ADMINISTRATION

A. Organization

1. Designate the state agency or RD responsible for developing and administering or supervising the administration of the State Plan.

The Replacement Designee (RD) for Missouri is the International Institute of St. Louis' (IISTL) Missouri Office of Refugee Administration (MO-ORA). IISTL/MO-ORA will be responsible for developing and administering the Refugee Resettlement Plan (RRP) for the State of Missouri.

2. Provide the name and title of the State Refugee Coordinator (SRC) and indicate whether the person is responsible for administering the entire Refugee Resettlement Program (RRP) or a specific element of it.

Paul Costigan, the Senior Vice President of Operations at IISTL, is the State Refugee Coordinator (SRC) for the State of Missouri. He is responsible for Refugee Cash Assistance (RCA), Refugee Medical Assistance (RMA) eligibility determinations, Refugee Support Services (RSS), and program set-asides, including Services to Older Refugees (SOR), Refugee School Impact (RSI), and Youth Mentoring (YM), as well as the Wilson-Fish TANF Coordination Program.

3. Provide the name, title, and agency of the Refugee Health Coordinator (RHC), as applicable.

Although not part of this specific proposal, a to-be-named staff member from U.S. Committee for Refugees and Immigrants (USCRI) will serve as State Refugee Health Coordinator (SRHC). There is frequent and substantive collaboration between the SRC and SRHC.

4. Describe the organizational structure and functions of the RD.

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 which allows it to provide objective financial and programmatic oversight of ORR funded IISTL programs as its own entity. MO-ORA has created its own website, weekly and quarterly newsletters, and state-wide database with information relevant to its work in the state, including updating information on a regular basis on changes to the RRP. MO-ORA has stringent policies and procedures in place that ensure that its financial and programmatic oversight of refugee services are impartial and objective.

Arrey Obenson is IISTL's President and CEO and Authorized Representative. He 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 neighborhood development.

Paul Costigan is the State Refugee Coordinator (SRC) of Missouri's RD. Paul has been with IISTL for twenty-four (24) 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 State Refugee Coordinator (ASRC) of MO-ORA. 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). Linda supervises staff providing Refugee Cash Assistance services and Quality Assurance for multiple programs, provides oversight of that statewide database, and is the point person for relationships with state government agencies.

The State Refugee Coordinator and Assistant State 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/RHP
- 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
- Provide state-wide guidance on ORR Policy Letters

Staffing in **FY 2024** for MO-ORA, excluding those under the Medical Replacement Designee (MRD) include:

- Carol Gaal, Manager of Grants Accounting (RD) 100% FTE – Primary responsibility is fiscal oversight, budgeting, financial reporting and contractor/recipient payment tracking.
- Marisa Tesoro, Communications and Training Coordinator (RD) 100% FTE – Primary responsibility is to coordinate communication efforts on refugee issues such as on

website, social media, education and training, and further development of communications infrastructure.

- Mohammad Tamim Afghanzada, IT **Manager** (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.
- Fatema Medhat, MSW, Program Manager (WF TANF, not included on ORR-1) 100% FTE – Primary Responsibility is to oversee all program components; develop relationships with project partners; develop and provide training for clients, partners, and sub-recipients; and develop project plans.
- Markus Jones, Program Evaluator (WF TANF, not included on ORR-1) 100% FTE – Primary Responsibility is to build out data capture systems, ensure compliance with the sub-recipients, and monitor program goals and objectives.
- Laura Parker, EdD, ELL Regional Coordinator (WF TANF, not included on ORR-1) 100% FTE – Primary responsibility is to create and pilot an English Language Learning (ELL) program for remote-based clients throughout the state. She will coordinate agreements, resources, trainings, and partnerships, and review findings of the pilots to determine best practices and alternative structures to assist program success.
- Safia Mayy Amerin, Emerging Initiatives Designer (WF TANF, not included on ORR-1) 100% FTE – Primary responsibility is researching, reviewing, evaluating, and developing training and training tools for agencies working with refugee TANF- eligible families.
- TBD, Refugee Benefits Coordinator (RD) 100% FTE - Primary responsibility is coordinating the Refugee Cash Assistance (RCA) program, approving enrollment applications, and assisting the local refugee agencies (LRAs) with RCA applications, enrollments and payments.

- Kristin Stillman, Quality Assurance Program Analyst (RD) 100% FTE – Primary responsibility is developing and implementing tools and reporting mechanisms to track RSS and set-aside programs to assure program guidelines and requirements are being met. She will provide training and guidance to LRA staff, as well as consult with the Regional Data Specialists to assist in local quality assurance tasks. In addition, she will be providing the SCR in coordinating monitoring resources, policies, and procedures for the various subcontracted MO-ORA programs.
- Emre Sepici, Missouri Resource Coordinator (RD) 100% FTE – Primary responsibility will be to assist in the coordination of local community and government involvement and resources in supporting refugee resettlement, including Community Support programs. They will assist in the development of statewide resources specific to community and private sponsorship.
- Jenni Kornfield, Refugee Programs Coordinator (RD) 100% FTE – Primary responsibility is to assist in developing and coordinating resources for the RSS, Youth Mentoring, and SOR programs.
- Eric Petersen, Mental Health Coordinator (RD) 80% FTE – Primary responsibility is to assist in developing and coordinating health and mental health resources in local communities.
- Shawn Cockrum, Refugee School Programs Manager (RD) 100% – Primary role is to coordinate services to schools and school districts taking part in Refugee School Impact and Support to Schools. They will contract with the program participants, provide resources to schools, and develop a statewide program of best practices for refugee youth in school.

- Dmitro Sukov, Accounting Services Coordinator (RD) 100% FTE – Primary responsibility is in the role of accounts payable, ensuring RCA clients, school districts and other vendors receive accurate and timely payments.

Also in FY 2024 MO-ORA intends to add a Digital Content Associate to assist in information dissemination across the state through the website and various forms of social media including related to community and private sponsorship.

5. Describe the process for convening quarterly meetings of state and local governments and private stakeholders in localities where refugees are resettled, including the proposed invitees for each meeting.

Half-day quarterly statewide meetings have been a staple of MO-ORA’s work since its founding in 2018. MO-ORA quarterly meetings are held in person at a central Missouri location to ensure no one entity is overly burdened with travel to attend the meetings. One meeting per year (in December) is held virtually as weather conditions sometimes make travel unwise. These meetings focus mainly on programmatic functions, and generally those in attendance are representatives of subcontractors, as well as Missouri’s Department of Elementary and Secondary Education and the Medical Replacement Designee (MRD). Invitations are also extended to representatives from the state government’s Department of Social Services, the Missouri Coalition Against Domestic Violence, and other public and private stakeholders critical to our programs.

During the pandemic, all quarterly meetings were held via Zoom, and lasted approximately two hours. Quarterly in-person meetings have since resumed, using a hybrid approach (i.e.: in-person and Zoom) to include more state-wide representation.

The SRC, SRHC and the ASRC attend quarterly community consultations held by local resettlement agencies (LRAs) in which a wide range of community members attend, including public safety, health, education, job centers, civic leaders and more.

6. Describe the program and fiscal oversight for the overall RRP delineating individual components as applicable (Refugee Cash Assistance, Refugee Medical Assistance, Refugee Support Services (RSS), and RSS Set-Aside programs). Include a detailed description of the proposed protocol to monitor and evaluate subrecipient operations.

Programmatic oversight of the programs listed at the end of this narrative is done by the SRC, ASRC and the Eligibility and Compliance Specialist. These three evaluate reports submitted as well as spot check each agency's programmatic performance on a regular basis.

Fiscal oversight is done by the SRC and MO-ORA's Manager of Grants Accounting. Monthly financial meetings go over rates of spending by the LRAs and by MO-ORA administration to determine over/underspending and whether adjustments need to be made. Both positions have taken part in Uniform Guidance training (2 CFR Part 200) and continue to improve their overall oversight skills. They perform risk assessment functions on new and existing sub-recipients annually including collecting and reviewing annual audits from the sub-recipients, and searching for new exclusions using SAM, FAPIIS and the federal excluded parties list.

Additionally, MO-ORA programmatic and fiscal management undergoes a review as part of IISTL's annual external audit.

The purpose of programmatic and fiscal monitoring is to ensure that 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 monitors LRA and other subcontractors for fiscal and program compliance, either on site or virtually, for all programs (RCA, RMA, RSS, RSS Set-Asides, ASA, AUSAA and WF TANF). RSI programs may be monitored through a graduated monitoring system, based

on the results using a MO-ORA developed self-assessment tool(s) and proposed/expended use of funds. MO-ORA also provides technical assistance, assisting LRAs and other subcontractors in setting up and maintaining systems that allow them to track measures and performance and to submit the required reports pursuant to 45 CFR 400.28. MO-ORA has selected and has developed data management systems which will allow gathering and aggregation of information and data on services provided to refugees under RCA, RSS, ASA, SOR, YM, and other set-asides.

MO-ORA has and will continue to follow-up with LRAs and other subcontractors 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 entails 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 includes technical assistance training for LRAs, subcontractors, and other community partners on subjects essential to providing assistance and services, including reporting requirements and how to use the state-wide database to compile reports.

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 monitors LRA and other subcontractors to ensure that refugees are enrolled in RCA, RMA, and other services for which they are eligible in a timely manner.

MO-ORA prepares monitoring reports that include findings for any perceived non-compliance with any fiscal and/or program components. Sub-recipients 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.

7. Describe the procedures to verify client immigration status to ensure initial and continued client eligibility for ORR funded refugee assistance and services.

Local resettlement agency staff receive training in immigration documentation. Staff are also provided manuals describing various eligible immigrant statuses and documentation and contact the MO-ORA administration if additional information is required. MO-ORA's **Refugee Benefits Coordinator and ASRC** oversee questions of eligibility and ensure compliance with ORR and other regulations for all MO-ORA programs.

8. Describe the procedures to safeguard the disclosure of client information.

Electronic client information is password-protected, and access to sensitive information is accessible only to those with proper credentials. Client information is exchanged via a HIPPA-certified data system and may only be viewed by the resettlement agency and MO-ORA administration. In addition, any agency utilizing the database system must sign and adhere to a data sharing agreement, and all staff accessing the system must sign a security agreement.

IISTL/MO-ORA's Policies and Procedures Manual outlines the protections client information receives. It states that clients have the right to:

- Privacy and confidentiality regarding all personal situations & information,
- Records kept confidential, except where required by law.

The RD has a process in place where client grievances and complaints are addressed if there is a situation whereby client information was not protected. IISTL/MO-ORA certifies that pursuant to 45 CFR 400.27(a), it will "ensure that no information about, or obtained from, an individual and in possession of any agency providing assistance or services under the plan to such individual will be disclosed in a form identifiable with the individual without the individual's consent..." This assurance holds true in cases of electronic records as well as physical records.

9. Describe data systems used to collect and maintain records necessary for federal monitoring and how data is reviewed to ensure accuracy and timely submission of reports, including but not limited to, the ORR-5 and ORR-6.

MO-ORA has purchased and implemented a state-wide database system the subcontracting agencies began fully using October 1, 2020. All agencies must enter any ORR-eligible client seen by the agency as of October 1, 2020, for all programs for which the agency is a subcontractor. Regional Data Specialists (RDS) provide additional database training for their agencies, as well as review data for accuracy, performing regular quality control reviews and developing database reports to ensure reliable and timely data. MO-ORA also provides on-going report training, ensuring agencies are up to date on policy and report changes. The state-wide database is also reviewed on an on-going basis for possible improvements by MO-ORA staff and suggestions from users to ensure reliable and measurable data.

The database is crucial to gathering accurate data for submissions of ORR-5 and ORR-6 and other reports and for maintaining records necessary for federal monitoring and on-going data reviews. Information is spot-checked on an on-going basis for accuracy and quality control assurance.

In addition, the Medical Replacement Designee for Missouri (USCRI), provides ORR-5 data for those clients receiving Refugee Medical Screenings (RMS) and Refugee Medical Assistance. USCRI maintains their own database; MO-ORA reviews and integrates USCRI data into the report. USCRI does not provide data for MO-ORA ORR-6 reporting.

The MRD and the RD have a signed MOU that allows for data sharing between entities for reporting and other purposes.

10. Provide the location of the RD headquarters. Provide the location of both in-state and out of state headquarters, as applicable.

The location of International Institute's headquarters is at 3401 Arsenal Street, St. Louis, Missouri, 63118.

The MO-ORA office is located off-site to ensure transparency at 911 Washington Avenue, Ste 215, St. Louis, Missouri, 63101.

11. Describe how the procurement process to acquire services will support a transparent (1) merit-based selection of sub-recipients, and (2) distribution of funding between sub-recipients based on objective factors.

MO-ORA publishes a Request for Proposal (RFP) every three (3) years for Refugee Social Services (RSS) and its corresponding set-asides (with the exception of Refugee School Impact funding). The RFP proposes to select proposals for each of four (4) regions defined in the RFP.

- 1) Merit based assurance – The RFP contains evaluation criteria that awards points based on cost, offeror’s experience, reliability and expertise of personnel, method of performance and collaboration with other entities. The proposal for each region with the highest points is awarded the subcontract.
- 2) Distribution of funding – Funding is allocated amongst the regions based on a calculation that takes into account the distribution of: 1) the individuals reported on the ORR-5, broken down by age groupings (employable for RSS – age 18-62; elderly for Services to Older Refugees; ages 15-23 for Youth Mentoring); 2) estimated arrivals for the following fiscal year; and 3) a base rate to ensure continued agency viability.

12. Briefly describe the RD’s 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 RD, do not result in a conflict of interest that unduly benefits the RD.

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 the agencies affiliated with MO-ORA.

13. Briefly describe the RD’s policy for resolving disputes that may arise between the RD and the sub-recipient agencies as well as between the RD, providers that are part of the same 501(c)(3) as the RD, and clients.

MO-ORA has a written policy and procedure outlining how it will resolve disputes. In part, the policy reads, “An applicant for or recipient of financial assistance and/or services through the Replacement Designee (RD) RCA or Social Services programs has the right to obtain the review of any determination regarding the furnishing or denial of services. The review process may consist of up to three (3) stages, in which the procedures provide the individual and the RD opportunity to submit additional evidence and information.” The three steps to dispute resolution are administrative review, fair hearing and finally mediation. Each of these steps has a clearly outlined procedure.

If a dispute with no resolution arises between the RD and a provider that is part of the same 501(c)(3), the dispute will immediately be turned over to an objective third party upon agreement of the two sides. The decision of the third party shall be considered binding.

B. Assurances – 45 CFR § 400.5

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 ORR Director (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 (as needed) to comply with ORR standards, goals, and priorities established by the Director.
5. Provide all ORR eligible populations with the assistance and services described in the application or State Plan without regard to race, religion, nationality, membership in a particular social group, sex, or political opinion.

6. Convene, not less often than quarterly, meetings where representatives of local resettlement agencies, local community service agencies, and other agencies that serve refugees meet with representatives of state and local governments to coordinate the appropriate services for refugees in advance of the refugees' arrival. Such meetings shall include outreach and invitation to, at a minimum, public school officials, public health officials, welfare and social service agency officials, and police or other law enforcement officials, for jurisdictions in which ORR-eligible populations resettle.
7. Act in accordance with 45 CFR §§ 75.351-75.360 and 400.22(b) (2) with regard to subrecipient monitoring and management.
8. Act in accordance with 45 CFR §§ 75.371-75.380 for remedies for subrecipient noncompliance.

II. ASSISTANCE AND SERVICES

A. *Coordination and Access – 45 C.F.R. § 400.5*

1. **Describe how the RD 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.

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

- a) Employment services, including but not limited to the development of an Employment Assessment and Goal Plans for each employable family member, a component of the Family Self-Sufficiency Plan (FSSP), 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, offered either in-house or by a local vocational training provider;
- f) Skills recertification, if appropriate;
- g) Case management, referral to additional services, and the tracking of those services; and,
- 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 group/classroom setting. Some services may be performed by community agencies, 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 meet the needs of the clients and fulfills the LRA's responsibility to enable employment and early self-sufficiency.

2. Describe how assistance and services will be coordinated among resettlement agencies, state and county agencies, and service providers in the community, and how the RD will communicate with subrecipients.

MO-ORA has developed working relationships with all LRAs, providing on-site trainings, web-based trainings and communications, and meeting during quarterly refugee meetings to discuss the progress of the statewide program. The proposed Communications and Training Specialist position will take on the responsibility of coordinating support services.

MO-ORA has developed points-of-contact listings for various issues related to subcontracts, finances, and programs both among LRA and MO-ORA. LRAs have been informed whom to contact dependent on the area of need. MO-ORA retains an ‘open door’ policy, allowing subcontractors to contact them as needed. MO-ORA regularly communicates with subcontractors by phone, e-mail correspondence and a posting site (SharePoint). Statewide quarterly refugee meetings have been re-instituted; agendas and supporting documentation are sent out prior to the meetings; and subcontractors are requested to supply or note anything they wish to discuss.

Besides quarterly refugee meetings involving MO-ORA (RD and MRD), state agencies, and local services providers, MO-ORA has initiated and will continue to provide the following to assist in communications with subcontractors:

- Weekly newsletter – A weekly newsletter sent to the LRAs and other community partners, to communicate up-to-date changes, policies and/or news related to RCA, RSS or other refugee-related services and available resources. MO-ORA also provides news blasts through the newsletter system as needed, generally around new information that effects program requirements, upcoming educational and training opportunities, and other points of interest where immediate notice to the LRAs and community partners is desired.
- 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, training videos and information from the quarterly refugee meetings that may be accessed by all LRA staff.

- Multi-Media sites – MO-ORA is also active on social media, which includes a website, Twitter, and Facebook accounts. A blog is provided on the website, giving general updates on community events, resettlement agency and program spotlights.

3. Describe how ORR-eligible populations residing in the state or applicable region will have reasonable access to ORR cash assistance and services, including access to remote 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 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 (or longer, if ORR-waivers are available), contracting with LRAs across the state to provide the following employability services, utilizing funding through Refugee Cash Assistance, 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 the 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 sixty (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 Family Self-Sufficiency Plan (FSSP) 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 RCA benefits pursuant to 45 CFR 400.82.

Additionally, the FSSP will assess the whole family, to assist them in becoming self-sufficient and retain economic self-reliance. An FSSP Assessment identifies and measures different 'standard of living' categories, allowing MO-ORA to perform follow-ups and measure the effectiveness of the family's FSSP.

To assist in reaching potential ORR eligible populations in remote areas, MO-ORA has developed a website listing the local resettlement agencies and their contact information. LRAs utilize virtual resources (cell phones, WhatsApp, Zoom) to assist remote-based individuals apply for and receive RCA, RMA, and other services. Standard forms for RCA (i.e.: Rights and Responsibilities, Consent) are written in the nine (9) predominant languages spoken by refugee clients, and copies are mailed to them during site visits and/or after applications are processed as an additional resource. LRAs continue to identify additional resources in remote locations where ORR-eligible populations have been identified, and in many cases, are already working in cooperation with resources in the areas to assist the individuals/families. (MO-ORA has developed a Memorandum of Understanding with the Missouri Family Support Division (FSD) that enables the agency and LRAs to receive listings of potentially ORR-eligible individuals and families located in remote areas within the LRAs' covered region).

In addition, FSD and other partners have been made aware of the Community Support programs and are working with MO-ORA to assure individuals and families arriving to Missouri through these means will have access to specialized services that have been developed and are utilized by resettlement agencies to carry out the objectives of many of the programs.

- 4. Describe how ORR-eligible populations will have access to other programs in the community, such as childcare, older adult 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 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. LRAs are encouraged to broaden their resource network even further to meet the complex needs of refugee families. The statewide database (referred to as MO-RAP) also provides a mechanism to capture information on community partners, including the number and type of referrals made.

Also, as noted previously, FSD and other partners have been made aware of the Community Support programs and are working with MO-ORA to assure individuals and families arriving to Missouri through these means will have access to specialized services that have been developed and are utilized by resettlement agencies to carry out the objectives of many of the programs.

- 5. Describe how the RD will ensure that language training and employment services are made available to ORR-eligible populations, including efforts to actively encourage registration for employment services.**

The LRA sub-recipients are required to provide employment services that consist of development of a Family Self-Sufficiency Plan (FSSP) 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.

Sub-recipients 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 sub-recipients are required to complete and submit to MO-ORA ORR-6 reports indicating the provision of social services outlined above.

LRAs will be strongly encouraged to provide language training and employment services to clients not receiving cash assistance as well as for those that are receiving it. English Language Training (ELT) services are currently provided directly by an LRA, through referrals to other ELT services near the ORR-eligible individual/family, or a combination of both.

MO-ORA puts together a series of trainings annually covering basic Refugee 101 training, Cuban/Haitian Immigration Documentation and Eligibility for Services, FSD-related training on SNAP and TANF, and other needs indicated by survey responses. Many partnering agencies in the employment field attend, assisting them in providing resources that lead to improved communication and service provision to their clients.

- 6. Describe how the proposed RD will prepare itself and subrecipients to continue services to the highest level possible in an emergency, including plans for collaboration with state emergency response agencies to ensure refugees' ongoing access to mainstream services during emergencies. Within your description, indicate if the state or RD is requesting to waive selected requirements of 45 CFR § 400.43 and ORR PL 16-01 regarding confirmation of applicants' eligibility, in cases of emergency or disaster, as per ORR PL 22-05. Also indicate if the state or RD is requesting to waive the 60-month eligibility period for RSS base and set-aside funds under 45 CFR § 400.152(b) to facilitate the provision of extended**

or additional support services and/or emergency assistance for ORR-eligible individuals in case of extreme circumstances, as per ORR PL 22-05.

IISTL has an emergency plan for itself and its clients, and MO-ORA abides by those processes. The SRC has an on-going working relationship with the state's Department of Homeland Security Emergency Management Officer and FEMA officers in the state. In FY 2024 FEMA will provide emergency preparedness training for leaders in refugee communities at various sites in the state. This project, within several ORR regions, seeks to train local refugee leaders to in turn train those in their ethnic groups how to manage their communities during an emergency. As part of this effort, Missouri will develop a plan with the LRAs on site specific procedures that will ensure continuous service provision in the event of a catastrophic event.

MO-ORA has requested waivers and flexibilities per ORR PL 22-05.

B. Refugee Cash Assistance (RCA) and Employment Services – 45 C.F.R. 400 Subparts E and F

1. Indicate whether RCA is publicly administered or is administered through an ORR-approved public/private partnership.

As a Replacement Designee, RCA is a public-private partnership approved by ORR. MO-ORA administers the RCA program, subcontracting out to local resettlement agencies (LRAs) to provide intake and assessment, enroll in RCA, provide monthly follow-ups, and perform the other on-going requirements of the program.

2. If RCA is administered differently across the state, list the geographic service areas in which RCA is publicly administered and the geographic service areas in which RCA is administered under the PPP program.

RCA is not administered differently across the state of Missouri.

3. Describe how the RD will ensure that RCA participants are informed about the program in a language they understand.

The RCA application process is contained within the state-wide database, MO-RAP (also commonly known as ClientTrack). The LRA is required to provide an RCA Orientation and go

over the printed RCA Rights and Responsibility Forms (replicated in the top twelve (12) languages spoken by Missouri's most recent populations). The LRA Case Manager must note the date the orientation and copy were given to the client in their own language, as well as provide the interpreter's name and signature, if an interpreter was needed. The MO-ORA Refugee Benefits Coordinator reviews pending RCA enrollments and payments for accuracy prior to the finalizing the application and issuing payments.

Paper RCA applications in multiple languages are also made available to LRAs in the event the database is unavailable. Forms can be translated into other languages as the need becomes noted. Telephonic interpretation is also available for LRA staff and clients as needed.

LRAs have received training in the use of these forms and the state-wide database, as well as 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, as well as the MO-RAP database training tools. 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.

4. Describe how the state's Temporary Assistance for Needy Families (TANF) program considers the U.S. State Department's Reception and Placement cash assistance grant when determining eligibility for TANF and payment levels.

Missouri's TANF program, located within the Missouri Department of Social Services (DSS), disregards Reception and Placement cash assistance when determining TANF cash payment levels, defining it as supplementary assistance given to a participant by any public or private agency for a specific purpose.

5. Describe how the RD will follow the mediation and fair hearing standards and procedures outlined at 45 C.F.R. § 400.83.

RCA recipients may be subject to partial or complete loss of their RCA payment due to non-compliance with RCA program requirements. Mediation is a process used to assist RCA

recipients in retaining their full RCA payment. Sanctioning is a reduction or termination of an RCA grant/payment due to non-compliance with program requirements.

MO-ORA will comply with the mediation and fair hearing standards outlined in 45 CFR §400.83. If an RCA recipient determined mandatory for Employment and Training (E&T) participation refuses to initiate an ESP or actively take part in their Employment Service Plan (ESP), such as registering for employment, or to accept or continue appropriate employment, training, or language training, the mediation and sanctioning process shall be implemented. Mediation shall begin as soon as possible, but no later than ten (10) days following the date of failure or refusal to participate and may continue for a period not to exceed thirty (30) days – the RCA recipient is notified of the mediation process through the RCA Non-Compliance Letter.

The RCA case worker or other LRA representative will mail the non-compliant RCA recipient an RCA Non-Compliance Letter, noting the area(s) where the recipient is non-compliant with E&T requirements. The letter also includes a section to set a meeting time with the RCA recipient to officially start the mediation process. This gives the RCA recipient a chance to meet with their case worker and resolve any issues, to assist the RCA recipient either achieve their ESP goals or amend the plan to either reflect different or additional goals as appropriate. The RCA recipient is also given an option to reschedule the meeting within a certain specified time frame.

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

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 the 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 Refugee Benefits Coordinator 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 12-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.
- A Cuban/Haitian Entrant who is non-employable due to pending removal proceedings and whose status does not enable them to receive a Social Security Number (SSN) and work authorization.

7. Eligibility and payment levels – For Publicly administered RCA program – N/A

8. Notification to local resettlement agency – For Publicly administered RCA program – N/A

9. Eligibility and payment levels - 45 CFR §§ 400.56-400.63 and ORR’s Guidance for Public-Private RCA Programs

- a) Describe how the state or RD will determine initial eligibility for RCA, and the program’s process for determining continued eligibility each month, on the basis of compliance with the client’s Family Self-Sufficiency Plan and on the basis of the client’s income from employment.**

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.
- Remote applicants – Individuals and/or families residing in areas considered to be remote from the nearest resettlement agency may apply for services virtually.

The LRA intake worker completes an Intake and Assessment on all household members, gathering documentation supporting their immigration status. The state-wide database reviews the Intake and Assessment completed on each household and provides a listing of programs the client(s) appears eligible to participate in, including TANF and SSI. 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, is available in MO-ORA's RCA Manual.

For those determined potentially eligible for RCA, the worker goes over RCA rules, regulations, and rights and responsibilities, and has the RCA applicant sign various documents (this is done in the applicant's preferred language). The intake worker must submit specific information via the database for final eligibility approval, as well as initiate an Employment and Training (E&T) referral to the appropriate facility or agency department for those RCA applicants who are not exempt for participation. The RD receives all initial eligibility applications for RCA from the LRAs, completes the final eligibility determination in the state-wide database, informs the LRAs of the approval/non-approval for the clients' enrollment, and issues an RCA check in the client's name to be sent to the LRA, who then distributes the check via in-person or by mail. Initial check payments are for a full month's worth of benefits for the application month, available for distribution to the client within 15 days following the RCA approval.

For RCA recipients who are employable, recipients are referred to the LRA's RSS/Employment Department. LRAs must complete an FSSP, which consists of a series of components: FSSP Assessment, Financial Assessment, Employability Assessment, Goals and Action Steps. The FSSP process must begin within 30 days of RCA approval.

LRA must meet with all their RCA recipients a minimum of once a month, either: 1) updating the individual employability plans to note progress and to adjust steps necessary to meet the goal of self-sufficiency for those mandatory for employment and training activities,

and/or 2) discussing any progress on action plans or status made by those who are exempt. Failure of those non-exempt individuals from participating with employability plans and goals will start the mediation/sanctioning process. Any health concerns or issues hindering goals are transmitted to USCRI and/or a social work department/resource 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.

LRAs must provide a listing towards the end of every month for those RCA individuals and/or households that are to receive RCA benefits the following month. The RCA budget is reviewed when clients report either household changes that affect eligibility (i.e.: birth of child) or employment, and changes may then occur to the RCA payment level. (Example: Gross monthly employment income is calculated, and applicable \$90 work exemption and 3/4 income disregard are factored in, subtracted from the maximum RCA benefit level for the family size.) The RD mails the monthly payments to the LRAs, and payments are available to the clients by the 15th of the month. RCA payments are not prorated.

- b) Indicate and justify the income eligibility standard established by the state or RD after consultation with local resettlement agencies in the state. Describe how the standard meets the RCA program objective of economic self-sufficiency, indicate how the standard compares to the state TANF income eligibility standard, and whether the income eligibility standard will disqualify ORR-eligible populations for other means-tested benefit programs (e.g., SNAP, Medicaid).**

MO-ORA does not utilize federal poverty level standards to determine income eligibility, but instead allows earned income disregards to be applied to a refugee's gross income. This is modeled on the State of Missouri's TANF program which disregards two-thirds of earned income plus \$30. For RCA, once the disregard is applied to an RCA participant's gross income, the resulting net income must then be under the RCA Maximum Payment level (eligibility standard) designated for the family size to be considered eligible for an RCA Payment. The net income is then subtracted from the appropriate RCA maximum payment

level for the corresponding assistance size to determine the monthly RCA payment for the refugee(s).

Earned income disregards, which are applied for the duration of a case’s enrollment in RCA, include a \$90 standard work exemption and a three-fourths earned income disregard. No disregards are applied to unearned income. Missouri’s TANF program applies disregards only if a TANF Assistance Group’s earned income falls under 185% of the Need Standard (also known as the Consolidated Standard), which is also not based on federal poverty levels, but on a standard purportedly established by the state legislature in the 1960’s.

An extensive client cost-benefit analysis was completed, verifying that no individual/family will be disqualified for means-tested benefit programs based on the proposed RCA payment levels. When raising the RCA payment levels, beginning FY 2023, to the maximum allowed under 45 C.F.R. § 400.60, extensive discussion was held with the LRAs. This was done strategically to determine the viability of increasing the payment levels, to assess the impact on clients as well as LRAs.

MO-ORA feels the income eligibility standards noted above will assist in meeting the program objective of economic self-sufficiency. MO-ORA has incorporated higher eligibility standards, income disregards, and other supports within the RCA program to help clients secure gainful employment prior to completely removing them from the cash assistance part of the program, as individuals and families may continue to receive additional supportive services through remaining engaged in other programs run by the LRAs, some of which are administered by MO-ORA through subcontracts.

c) Provide the RCA and TANF payment standards for case sizes 1-5.

Case Size	1	2	3	4	5
RCA Max Payment	\$537	\$726	\$915	\$1104	\$1217*
MO TANF Standard	\$136	\$234	\$292	\$342	\$388

*For RCA case sizes above 5, add \$113 for each additional member.

MO-ORA developed a client cost-benefit analysis based on the revised RCA Monthly Payment Ceilings noted in ORR's Dear Colleague Letter of October 1, 2021 (DCL 22-01). This analysis afforded MO-ORA the opportunity to meet the RCA payment ceilings as written in DCL 22-01 and in accordance with 45 CFR §§400.56 – 400.63.

MO-ORA has also implemented the provisions of Dear Colleague Letter 22-12, adjusting the RCA eligibility period from 8 months to 12 months for those whose date of eligibility for ORR benefits was on or after October 1, 2021.

d) Provide an assurance that the state or RD will follow public/private RCA program requirements related to financial eligibility and consideration of resources and income.

MO-ORA understands and assures that it will follow public/private RCA program requirements related to financial eligibility and consideration of resources and income such as:

- a) Eligibility for RCA is limited to those who meet the income eligibility standard established by MO-ORA after consultation with local resettlement agencies in the state (45 CFR 400.59(a)).
- b) Will not consider resources remaining in the applicant's country of origin (45 CFR 400.59(b)).
- c) 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)).
- d) 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)).

e) If the PPP program received prior approval from ORR to provide a differential RCA payment to TANF clients, describe how the state or RD will administer the differential program.

MO-ORA is not proposing differential payments to TANF clients at this time.

- f) **Describe the state’s or RD’s policy and procedures regarding the beginning of RCA eligibility, the timing and frequency of RCA payments throughout the client’s eligibility period, how payment levels will be structured (including whether incentive payments and/or income disregards will be used), types of payment (e.g., direct cash, vendor payments), the method of distribution of RCA payments (e.g., check mailed, electronic benefits transfer, direct deposit), 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 twelve-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

- a) Initial payment – The initial RCA payment should be received within 15 days of the approval.
- b) On-going monthly payments – On-going RCA payments will be received no later than the 15th of the month.

Payment Levels

- a) Payment levels and disregards are as noted in the sections above.
- b) Employment incentives –
 - i. Work-related expenses – Those with verified employment may receive up to \$50 per month in gift cards to assist with employment-related expenses, up until their RCA closes due to excessive employment income.

- ii. Employment bonuses – Those whose RCA case is closed early due to employment and have four (4) or more months left of their twelve-month eligibility time period are eligible for one (1) month’s worth of full RCA benefits upon verified continued employment. Early employment is generally considered to be within eight months of enrollment.

Types and Method of Payment

RCA payments will be by check addressed to the RCA enrollee. Checks will be mailed to the LRAs once per month to be distributed to the RCA participant. LRA will document receipt and dispersal of the check and submit a case note in the MO-RAP case management database.

MO-ORA is currently in the process of evaluating the use of a debit/EBT-type card to be used to distribute RCA payments to the RCA participant. It is hoped to start implementation of such a process during FY 2024, but the specifics of that process are not defined as yet.

Proration

MO-ORA does not pro-rate any RCA payment.

- g) **Describe the systems that ensure the state or RD does not exceed prescribed client cash assistance levels and eligibility timeframes.**

MO-ORA has developed an RCA approval and budgeting process in the state-wide database, which determines the correct amount of assistance. The system also contains an RCA dashboard that provides the client’s Date of Arrival, Days 120 and 150, and the twelfth month of arrival.

- 1) Agencies submit their initial RCA eligibility and payment through this system, which MO-ORA staff review for approval and payment.

- 2) If income changes occur, the agencies submit a new RCA budget through the database, which is reviewed prior to approval.
- 3) For those monthly payments with no adjustments, agencies submit a Monthly Payment Listing (MPL) through the system towards the end of each month for the following month. The MPL is reviewed for accuracy prior to payments being issued.

h) Describe the monitoring timeframes for regular review and the reconciliation of RCA payments found not to be in compliance.

RCA monitoring, unless determined needed sooner due to consistent issues with a particular LRA(s), is generally scheduled annually. RCA payments found not in compliance (incorrect payment) are treated as follows:

- 1) Underpayment: There may be times when an RCA household does not receive their full benefit payment, either due to an error on the part of the LRA or an error regarding employment information (such as an overstatement of work hours by the employer). The LRA will review the case, due a budget adjustment, and credit the RCA recipient with the difference. A check from MO-ORA will be issued separately from the regular monthly check. The LRA will provide a statement to the recipient as to the reason for the additional payment, maintaining a copy in the client's file.
- 2) Overpayment: There may be times when an RCA household receives RCA benefits incorrectly, usually due to either not reporting employment timely or an error on the part of the LRA. An overpayment may be discovered by either an LRA or MO-ORA through review of case files or case-related information. RCA benefits given incorrectly must be considered a debt of the client, and the LRA is mandated to attempt to collect this debt. Collection of debt due to RCA overpayments may be accomplished in one of two ways:
 - Reducing RCA benefit check – For RCA recipients actively receiving RCA, RCA checks will be reduced as follows:

- a) If the amount of the overpayment is less than the next RCA check, the amount of the overpayment will be deducted automatically from the check (report this on the RCA Monthly Payment Listing). Continue deducting from any following RCA checks until overpayment is paid off.
- b) If the amount of overpayment is more than the total of the remaining RCA checks to be issued, deduct from the monthly RCA checks, and work with the client to pay off the remainder.
- Reimbursement plan – For individuals no longer receiving RCA, the client may make plans with the LRA for reimbursement. Methods of reimbursement include:
 - a) A lump sum payment of the total amount owed.
 - b) Monthly installment payments.
 - c) A combination of the above options, with the client making a down payment and paying the remainder in monthly installments.
- Repayment schedule – The LRA will use the following criteria when considering a repayment schedule:
 - a) Repayments should be made as quickly as possible, ideally within three (3) to six (6) months.
 - b) Monthly installments should not exceed ten percent (10%) of a household's gross monthly income.
 - c) Review on a case-by-case basis to account for extenuating circumstances in the household and adjust as appropriate.
- Extenuating circumstances regarding repayment – In addition:
 - a) Any repayments due after the individual(s) had been off RCA for 60 months shall be considered paid-in-full.

- b) If the individual(s) is receiving SNAP benefits, do not attempt to collect overpayments until their SNAP case is closed.
- c) If the individual(s) remains on SNAP one year after their RCA case is closed, all debt shall be considered paid-in-full.

i) List the geographic service area(s) of the state that PPP-administered RCA service providers cover.

RCA service providers cover Missouri state-wide.

10. RCA program administration - 45 CFR § 400.13

a. Indicate which agency is responsible for determining RCA eligibility (e.g., state TANF office, private resettlement agency).

RCA determinations are a joint responsibility between the RD and the resettlement agencies. Individuals apply for RCA at local resettlement agencies. The agencies fill out the application/enrollment in MO-RAP, which generates an email to MO-ORA stating an RCA application has been made and is awaiting approval. MO-ORA reviews and approves RCA applications, if appropriate. The agencies, upon final approval, issue an RCA Approval Letter to the applicant(s).

b. If eligibility determinations occur at the state level, describe how staff is allocated between TANF and RCA.

N/A

c. Indicate which agency is responsible for distributing RCA benefits (e.g., state TANF office, private resettlement agency).

MO-ORA sends the approved RCA payments to the corresponding resettlement agency, who then distributes the RCA benefits to the clients.

d. Describe how many full-time equivalents are allocated to RCA administration (e.g., RCA eligibility determinations, 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, LRAs 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. Other staff members also perform RCA-related duties including training, database support, financial management, etc.

- e. **If the agency is charging indirect costs to CMA, provide the rate and describe how the rate is determined, what it covers, 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. IISTL consistently charges the 10% de minimis across all of its federal programs.

C. Refugee Medical Assistance (RMA) – 45 C.F.R. 400 Subpart G

USCRI is the MRD for the state of Missouri. As such the RD and MRD have built a collaborative relationship for the benefit of the state's refugees.

RDs that collaborate with ORR's Medical Replacement Designee (MRD) for the provision of RMA should skip to and address item #5.

- 5. RD collaboration with the Medical Replacement Designee (MRD) for the provision of RMA.**
- a) **Describe the process to determine eligibility for Medicaid and CHIP.**

A refugee case must be determined to be ineligible for Medicaid and SCHIP prior to enrollment in RMA, based on a review of the household composition and the knowledge of the Medicaid programs (known as MO HealthNet) administered by the State of Missouri. The state-wide database, upon completion of Intake and Assessment for the household members, indicates potential eligibility for MO HealthNet programs as applicable. For individuals

and/or families determined eligible for MO HealthNet, the LRAs assist them in filling out and submitting the appropriate applications.

LRAs have 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. MO-ORA has also 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.

b) 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 policies and procedures pertaining to RMA.

MO-ORA understands and assures that it has and will 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.

c) 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.

d) Provide assurance that RMA eligibility determinations will be conducted in accordance with 45 C.F.R. §§ 400.100 – 400.104, as applicable, and ORR PL #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 ORR Policy Letter #16-01.

D. Medical Screening- 45 CFR §§400.5(f), 400.107

Although not part of this state plan, the RD and MRD work collaboratively on the provision of Medical Screening. The RD offers support to the MRD whenever possible in this area.

E. Refugee Support Services (RSS) – 45 CFR 400 Subpart I

- 1. List and describe the support services to be provided. List services outlined in 45 C.F.R. §§ 400.154, 400.155, or ORR PL 16-07, then any support services that are not outlined in policy. For all proposed services, outline the strategy for service delivery, addressing program structure, procurement timeframes, the roles of contracted providers, geographic service areas projected, target population(s), and activities.**

MO-ORA subcontracts with LRAs throughout the state of Missouri to provide support services to refugees and other ORR-eligible populations under the Refugee Support Services program. Subcontractors may provide the following employability services as noted in 45 CFR §400.154:

- a) Employment services include 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 meet 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 a Family Self-Sufficiency Plan (FSSP) that addresses the employment-related services needs of the employable members of a family, as well as supportive services for the other family members, 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 job placements made through the state-wide database, as well as provide 90-day follow-up information regarding the status of their employment.

Additionally, the subcontractors are required to complete and submit to the RD ORR-6 reports indicating the provision of social services outlined above.

The procurement timeframe for RSS is every three (3) years and agencies will again have the opportunity to apply for FY 2026. As there is a presumption of an additional resettlement agency in Missouri in FY 2024, MO-ORA will evaluate the need for RSS funding for the new agency as appropriate.

2. Describe the plan for ensuring the completion and use of a Family Self-Sufficiency Plan (FSSP) for all refugees receiving RSS-Funded employment-related services (and their family members living in the same household), to include initial assessment, referral, and follow-up, as delineated in ORR PL 21-06.

As required in ORR PL 19-07 and subsequently in ORR PL 21-06, the RD mandates through subcontracts with the LRAs the completion of an FSSP as part of initial enrollment for employable RSS clients. The FSSP has been integrated into the statewide database, and LRA staff are able to complete the FSSP with the family electronically. The FSSP assesses each individual member of the family in the household, including children and/or any other member of the family in the household that can benefit from RSS in order to facilitate economic self-sufficiency, family stability and community integration for the household. The FSSP assists in identifying needed services to reduce barriers to the family becoming self-sufficient through the employment of one or more family members. A household budget must also be included as a component of the FSSP. MO-ORA requires that each FSSP leads to the subsequent referral to services, including but not limited to ORR-funded programs, other state and federally funded programs, and community programs. LRAs ensure that appropriate follow-up is conducted minimally at six- and twelve-months post enrollment to assess the family's progress towards individual goals identified in the initial FSSP and to refer them to any additional services, if needed.

The service provider must ensure that the FSSP is translated or documented that an interpreter was provided if a client has limited English proficiency as required by 45 C.F.R. §400.55. The client must sign a form indicating that they have participated in the components of the FSSP.

The required components of the FSSP are:

- Intake and Assessment of each RSS family member.
- List of barriers to becoming self-sufficient, through the use of an FSSP Assessment
- Financial Assessment

- Employment Assessment, which includes barriers to employment, for employable adults in the family
 - Goals and Action Plans/Steps to alleviate barriers
 - Referrals and Services provided to assist in meeting goals
 - Follow-up at 6- and 12-months post-enrollment
 - Progress towards goals identified in initial FSSP, as well as other defined goals and action steps
 - Proof of translation/interpretation, as applicable
 - Signature of client and/or other documentation noting client's participation and agreement to terms (allows for remote and/or virtual participation).
3. **If the RD anticipates receiving RSS set-aside funding for specific services or populations, (e.g., Refugee School Impact, including Early Refugee School Impact services, if applicable; Services to Older Refugees, Youth Mentoring; and/or Refugee Health Promotion, including Refugee Mental Health Initiative), describe those services, as outlined at 45 C.F.R. § 400.155 and in the relevant ORR policy letter(s) (e.g., ORR PLs 22-07, 22-08, 22-09, 20-05 and 22-06, or any subsequent policy letter pertaining to an RSS set-aside). Describe each set-aside's program structure, procurement timeframes, the roles or contracted providers, geographic service areas projected, target population(s), and activities. Describe how these set-asides services will complement services provided under RSS base funding.**

MO-ORA receives set-aside funding for Services to Older Refugees, Youth Mentoring and Refugee School Impact, as well as grant funding for Wilson-Fish TANF Coordination as described below. MO-ORA continues to seek additional programming and/or funding that would benefit ORR-eligible clients in the state. Beginning in late FY 2020, Refugee Health Promotion became a set-aside for Missouri, but this program is administered by the MRD (USCRI).

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 two (2) LRAs in Missouri, one located in Kansas City, and one in St. Louis 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.

The procurement timeframe for SOR follows the procurement schedule for RSS which is every 3 years and agencies will again have the opportunity to apply for **FY 2026**.

Youth Mentoring

Youth Mentoring (YM) programs operate in all **six** (6) LRAs in Missouri, one each in Springfield, Columbia, St. Louis, **Joplin**, and two in Kansas City. 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 to 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.

The procurement timeframe for YM follows the procurement schedule for RSS which is every 3 years and agencies will again have the opportunity to apply for FY 2026.

Refugee School Impact (Base and Early)

In FY 2023, MO-ORA contracted to complete an assessment process for Early RSI as recommended in ORR Policy Letter 22-07. The University of Missouri's Assessment Resource Center is currently conducting assessments for E-RSI and is expected to have the results in early FY 2024. MO-ORA will then similarly contract for a base Refugee School Impact (RSI) assessment in FY 2024 as recommended. MO-ORA intends to interview ELT administrative staff

at the four public school districts where resettlement currently takes place in the state. MO-ORA will also utilize any source materials the school districts have in their own assessments of education needs for ORR eligible student populations. The base RSI assessments will cover the following areas:

1. The needs of the ORR eligible families with age-appropriate children
2. Unique challenges that ORR eligible families face in accessing the US educational system
3. The level of collaboration with state and local education entities
4. Existing specialized programming for newly arrived populations

Refugee School Impact (RSI) grant is now administered through MO-ORA, finishing up the full first year of grant administration for FY 2023. The program has expanded from three (3) subcontracting school districts to approximately 31 across various ORR school support funding.

The Refugee School Programs Manager regularly consults with the Missouri Department of Elementary and Secondary Education (DESE) to ensure there is no duplication of services and that programs complement one another.

The goals of the RSI 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.

Early RSI programming may be developed following the results done of a statewide assessment for refugee children across the birth to kindergarten continuum. Because Early RSI will be completely new services, MO-ORA must determine the proper mechanisms for an assessment and subsequent implementation of early childcare programming.

Wilson Fish/TANF Coordination

The Wilson Fish/ TANF Coordination grant is known within the state as Missouri Refugee Temporary Assistance Connections (MO-RTAC). MO-RTAC identifies refugee families with children under 18, who are TANF-eligible and have been in the U.S. for not more than 36 months, through a cooperative agreement with the state of Missouri's Family Support Division (FSD) and subcontracts with all five (5) local resettlement agencies in the state. Those families will then be eligible to participate in MO-RTAC and receive services customized for the unique needs of refugees, taking into account the necessity for culturally and linguistically appropriate services that provide an holistic approach, using strength-based models to address challenges faced after resettling in their new homes.

The goals of the MO-RTAC program are two-fold:

- 1) TANF-eligible refugees achieve self-reliance. – Refugees receive the resources and life skills to become self-sufficient.

- 2) TANF-eligible refugees achieve sustained employment and increase their economic well-being. – Refugees continue to receive resources after employment to assure self-reliance.

The MO-RTAC program complements the RSS program, and many activities offered in each program are similar. ORR-eligible individuals/families, though, may be enrolled in both programs simultaneously, but LRAs must clearly define funding streams for the various program components. MO-RTAC, due to its unique agreement with FSD, is able to secure the names and addresses of ORR-eligible families to allow for participation in the program and developing partnerships with Missouri Work Assistance (MWA) subcontractors, following specific state requirements. MO-RTAC individuals and families may be referred to RSS programs upon reaching their 36-month period of eligibility.

- 4. List and describe the RSS services the state or RD provides using Afghanistan Supplemental Appropriations Act, 2022 and Additional Afghanistan Supplemental Appropriations Act (ASA) funds which includes Early may, Housing, Legal Assistance, Support to Schools, and all other Set-Asides. List services outlined in 45 CFR § 400.154, 45 CFR § 400.155, PL 16-07, PL 22-03, PL 22-11, or any subsequent policy letter pertaining to ASA RSS, and any support services that are not outlined in policy. For all services, outline the strategy for service delivery, describing program structure, procurement timeframes, the roles of contracted providers, geographic service areas projected, and activities, including any initiatives, and the related plans to distribute funding, for addressing emergency/short-term and long-term housing needs.**

Afghan Supplemental Appropriation (ASA) RSS funds are subcontracted to national agency affiliates and other subcontractors across the state which took part in the APA resettlement program, distributed on a ratio based on the affiliates/resettlement agencies' reported capacities for the APA program. These funds are contractually meant to provide short-term/emergency and long-term funding for housing for incoming Afghan Humanitarian Parolees (AHPs) and SIVs as well as to alleviate staffing issues the agencies are currently facing.

Eligible Populations

ASA funding is designated to support Afghans as defined below:

- Citizens or nationals of Afghanistan paroled into the United States under section 12(d)(5) of the Immigration and Nationality Act between July 31, 2021, and September 30, 2022.

- A spouse or child of any Afghan humanitarian parolee described above, who is paroled into the United States after September 30, 2022.
- A parent or legal guardian of an Afghan humanitarian parolee who is determined to be an unaccompanied child as defined by 6 U.S.C. 279(g)(2), who is paroled into the United States after September 30, 2022.
- Citizens and nationals of Afghanistan for whom refugee and entrant assistance activities are authorized (e.g., Special Immigrant Visa holders, Special Immigrants with Conditional Permanent Residency, SQ/SI parolees, refugees, asylees).

ASA Priorities

ASA funding is intended to provide support for traditional services provided under RSS base funding, but may also be used, when necessary, to support emergency/short-term and long-term housing for Afghan arrivals as a critical component in resettlement stability, self-sufficiency, and integration. ORR seeks to provide states with the flexibility and necessary resources to support capacity planning and coordination efforts for housing, given that a lack of available and affordable housing can create additional barriers to helping refugee populations find and retain employment, achieve self-sufficiency, and fully integrate into their new communities. Housing instability can also create additional barriers to the educational success and development of children.

ORR PL 16-07 allows for RSS funds to be used for transitional housing assistance aimed at supporting economic self-sufficiency during periods of high arrivals.

Each household member receiving employability services must be assessed for a Family Self-Sufficiency Plan within the statewide database MO-RAP, must be then referred for appropriate services and must receive follow-up at minimally six- and twelve-months post enrollment.

Contracted agencies engage Afghan leaders and communities in meaningful and consistent ways to inform program design and implementation, including creating consultative and advisory bodies, to the extent possible.

Housing, Legal Assistance, Support to Schools and additional programming

MO-ORA has engaged its sub-recipients to provide housing assistance to Afghans as needed to ensure self-sufficiency. Due to the unusually large family sizes for many AHPs, housing assistance has been offered for longer periods than is typical for other refugee families. A tactic being used to assist in shortening the length of time a family needs housing assistance is case management describing the necessity of having multiple sources of income for families.

Legal assistance for AHPs has come in the form of two non-LRA sub-recipients which specialize in asylum and SIV applications. Asylum Clinic Kansas City and MICA Project in St. Louis have been tasked since FY 2023 with supporting applicants and LRAs with the process of asylum/SIV applications and supporting the work of the LRAs in this area as well.

Procurement Timeframes and projected geographic service areas

LRAs have on-going contracts for ASA services for FY 2024. However, MO-ORA is constantly searching for additional community organizations with 501(c)(3) status and/or educational institutions with which to partner and subcontract. In those cases, there is no direct timeline for procurement of contracts or services. They will be on-going throughout the fiscal year. Moreover, MO-ORA is looking at areas of Missouri beyond the six (6) resettlement cities for organizations with which to partner for the provision of remote ASA services.

- 5. If the state or RD receives ASA set-aside funding for specific services or populations (e.g., Refugee School Impact, including Support to Schools (S2S) and Early Refugee School Impact services, if applicable; Services to Older Refugees; Youth Mentoring; and/or Refugee Health Promotion, including the Refugee Mental Health Initiative), describe those services, as outlined in the relevant policy letter(s) (e.g., ORR PLs 22-07, 22-12, 22-08, 22-09, 20-05 and 22-06, or any subsequent policy letter pertaining to an ASA-funded RSS set-aside). Describe each ASA-funded set-aside's program structure, procurement timeframes,**

the roles of contracted providers, geographic service areas projected, target population(s), and activities.

To date, RSS ASA, A-RSI, ASA Legal Assistance, ASA Youth Mentoring, ASA Services to Older Refugees and Support to Schools (S2S) have been allocated to the state of Missouri through the RD. USCRI, the MRD for the state, has separately received ASA for their Refugee Health Promotion program. RSS ASA programming is described in #4 above.

1) RSI ASA

As noted in #3 above, MO-ORA is collecting assessments as described in ORR PL 22-07 to determine services for base RSI and early RSI. MO-ORA has taken over from the Missouri Department of Elementary and Secondary Education and is implementing RSI, A-RSI and S2S across the state and currently is funding programs across 27 school districts. Prior to this year, only three school districts took part in RSI programming.

2) ASA RSS Legal Assistance

Legal Assistance funding is coordinated with local resettlement agencies and other resettlement providers subcontracted to provide Refugee Support Services (RSS) and subcontracts/agreements with legal entities that assist in providing a pathway to completion of SIV applications and Asylee status attainment and other immigration related forms and services, as outlined in ORR Policy Letter 22-11. As with other ASA-funded services, MO-ORA's database has been updated to collect data necessary for reporting on these services and programs. There are currently two non-profit asylum assistance agencies under contract in Missouri to support the coordination of SIV, TPS and asylum applications for eligible Afghan Humanitarian Parolees.

3) A-Youth Mentoring and A-SOR

Having received additional ASA funds for Services to Older Refugees (SOR) and Youth Mentoring (YM), MO-ORA is subcontracting with current SOR and YM sub-recipients providing those set-aside services. Amendments will utilize the language in the relevant Policy Letter to ensure services are available to eligible populations and that agencies in turn have the ability to report required information on the ORR-5 and ORR-6. As with all subcontracted services, MO-ORA will monitor programs to ensure agencies are in compliance with their sub-contracts and in alignment with service and financial provisions in accordance with relevant PLs and 45 CFR Part 400.

Procurement Timeframes and projected geographic service areas

MO-ORA is constantly searching for additional community organizations with 501(c)(3) status and/or educational institutions with which to partner and subcontract particularly with A-RSI and early RSI. In those cases, there is no direct timeline for procurement of contracts or services. They will be on-going throughout the fiscal year. Moreover, MO-ORA is looking at areas of Missouri beyond the 5 resettlement cities for organizations with which to partner for the provision of remote ASA RSS set-aside services. This is especially true with S2S funding where MO-ORA has already contracted with dozens of school districts across the state. New districts may apply for and receive funding for eligible students at any time during the fiscal year, but MO-ORA prefers applications before July 1 in order that local school districts may approve changes in district budgets in time for the subsequent school year.

- 6. List and describe the RSS services the state or RD provides using Additional Ukraine Supplemental Appropriations Act, 2022 (AUSAA) funds. List services outlined in 45 CFR § 400.154, 45 CFR § 400.155, PL 16-07, PL 22-15, or any subsequent policy letter pertaining to AUSAA RSS, and any support services that are not outlined in policy. For all services, outline the strategy for service delivery, describing program structure, procurement timeframes, the roles of contracted providers, geographic service areas projected, and activities.**

To date, the regions in the state seeing the largest influx of AUSAA eligible populations include St. Louis, Springfield, Kansas City and Sedalia, Missouri. The agencies serving these

areas have received allocations of AUSAA RSS funding to complement their existing RSS services to other populations. Agencies are aware that they may use those funds as necessary for SOR and YM set-asides if demographics dictate the need for those services.

Whereby the AUSAA RSS funding is intended to provide the same services as traditional RSS, such as employment assistance, case management, ELT, etc., LRAs may also utilize this funding when necessary to provide housing and food assistance for Ukrainian arrivals as allowed under PL 22-15. All services will be done in accordance with 45 CFR Part 400 subpart I. As with all employable RSS program participants, each individual member of the family will be assessed for a family self-sufficiency plan (FSSP) in accordance with PL 21-06.

MO-ORA has requested and received a waiver in accordance with ORR PL 23-05 to allow its qualified sub-recipients to provide allowable immigration legal assistance under AUSAA RSS funding. Mo-ORA maintains that it has sufficient funding after priority RSS services are provided to also provide allowable immigration-related support. MO-ORA and its sub-recipients will follow the list of eligible recipients and allowable services. Initially service provision will focus around the areas of St. Louis, Columbia (including Sedalia, MO), Springfield and Kansas City. MO-ORA will coordinate with providers to ensure that no services that USCIS or any other federal program provides will be duplicated.

- 7. If the state or RD receives AUSAA set-aside funding for specific services or populations (e.g., Refugee School Impact, including Early Refugee School Impact services, if applicable; and/or Refugee Health Promotion, including the Refugee Mental Health Initiative), describe those services, as outlined in the relevant policy letter(s) (e.g., ORR PLs 22-07, 20-05 and 22-06, or any subsequent policy letter pertaining to an AUSAA-funded RSS set-aside). Describe each AUSAA-funded set-aside's program structure, procurement timeframes, the roles of contracted providers, geographic service areas projected, target population(s), and activities.**

All funding from the RSI, ARSI, Support to Schools (S2S) and URSI allocations are made available to school districts with enrollments of students who meet the qualifications of each fund. School districts across the state are invited to apply for funds through a grant application

process throughout the fiscal year. The grant application requires the districts to identify the number of refugee students enrolled, the number of refugee families, the number of students to be served, the number of district staff that will be impacted and the number of full-time district staff that will be paid through the various funds. Districts are also required to describe how it will partner with the Missouri Department of Elementary and Secondary Education's Title III State Director along with the other local services providers and how the activities funded by the respective programs work within the district's comprehensive school improvement plan's goals and objectives. Other requirements of districts are to provide a detailed description of the activities planned and the evaluation process the district will use. Districts also provide a budget of planned expenditures and must sign off on assurances that it will comply with all applicable laws and regulations.

Equity and Inclusion

In all its programming, MO-ORA will stress the importance of advancing equity consistent with Executive Order 13985. By doing this MO-ORA will:

- Use an equity lens when developing new programming, to ensure that all ORR-eligible populations, regardless of race, religion, gender identity, sexual orientation, disability, or other characteristic(s), receive fair treatment, access, and opportunity;
- Review existing programming with an equity lens; and
- Identify and eliminate barriers that may prevent the full participation of some groups

MO-ORA will also practice inclusion, through purposeful collaboration and engagement with ethnic communities to inform service design and delivery.

Finally, MO-ORA is committing itself to position Missouri as a top tier welcoming state for LGBTQ+ refugees. MO-ORA is implementing the provisions of Policy Letter 22-14 and unequivocally recognizes the legal and civil rights of LGBTQ+ ORR-eligible individuals when

determining access to and providing services. With the numbers of LGBTQ+ people attempting to escape violence increasing worldwide, it is imperative that local resettlement agencies in Missouri are prepared to welcome and provide services tailored to this population. Additionally, with the increased emphasis on private and community sponsorship, MO-ORA will explore whether this may be an avenue for this population to resettle in Missouri.

F. Unaccompanied Refugee Minors

Missouri does not currently operate an Unaccompanied Refugee Minors (URM) program.