

**REFUGEE AND ENTRANT ASSISTANCE CLUSTER  
STATE ADMINISTERED PROGRAMS**

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<b>93.566</b>	<b>Refugee and Entrant Assistance State Administered Programs</b>
<b>93.576</b>	<b>Refugee and Entrant Assistance Discretionary Grants</b>

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**U. S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
ADMINISTRATION FOR CHILDREN AND FAMILIES**

**Federal Authorization:**  
**93.566** Cash and Medical, Social Services, Services for Elderly Refugees - Refugee Act of 1980, Section 412, 94 Stat. 111, 8 U.S.C. 1522, as amended, Public Laws 96-212, 97-363 and 99-605; Refugee Education Assistance Act of 1980, Title V, 94 Stat. 1809, 8 U.S.C. 1522 note, as amended, Public Laws 96-422, 96-424, 97-35, 100-436, 101-166, 101-302, 101-517, and 102-170.  
School Impact-Refugee Act of 1980, Section 412(c)(1)(A)(iii) of the Immigration and Nationality Act (INA), 8 U.S.C. & 1522(c) (1)(A)(iii).  
Youth Mentoring - Section 412(e)(5) of P.L. 82-414 the Immigration and Nationality Act (8 USC 1522).

**Federal Authorization:**  
**93.576** Health Promotion - 1522 Section 412(c)(1)(A)(iii) of the Immigration and Nationality Act (INA) (8 U.S. C.§1522(c)(1)(A)(iii)

**N. C. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
DIVISION OF SOCIAL SERVICES**

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**Address Confirmation Letters To:**

SFY 2021 audit confirmation reports for payments made to Counties, Local Management Entities (LMEs), Managed Care Organizations (MCOs), Boards of Education, Councils of Government, District Health Departments and DHHS Grant Subrecipients will be available by mid-October at the following web address: <https://www.ncdhhs.gov/about/administrative-offices/office-controller/audit-confirmation-reports> At this site, click on the link entitled “Audit Confirmation Reports (State Fiscal Year 2020-2021)”. Additionally, audit confirmation reports for Nongovernmental entities receiving financial assistance from DHHS are found at the same website except select “[Non-Governmental Audit Confirmation Reports \(State Fiscal Years 2019-2021\)](#)”.

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The Auditor should **not** consider the Supplement to be “safe harbor” for identifying audit procedures to apply in a particular engagement, but the Auditor should be prepared to justify departures from the suggested procedures. The Auditor **can** consider the Supplement a “safe harbor” for identification of compliance requirements to be tested if the Auditor performs reasonable procedures to ensure that the requirements in the Supplement are current. The grantor agency may elect to review audit working papers to determine that audit tests are adequate.

Auditors may request documentation of monitoring visits by the State Agencies.

## **REFUGEE AND ENTRANT ASSISTANCE CLUSTER, STATE ADMINISTERED PROGRAMS**

This compliance supplement must be used in conjunction with the OMB 2021 Compliance Supplement which will be issued in the summer. This includes "Part 3 - Compliance Requirements," for the types that apply, "Part 6 - Internal Control," and "Part 4 - Agency Program" requirements if the Agency issued guidance for a specific program. The OMB Compliance Supplement is Section A of the State Compliance Supplement.

### **I. PROGRAM OBJECTIVES**

#### **93.566 Refugee and Entrant Assistance State Administered Programs**

The purpose of the Refugee Cash Assistance (RCA) program is to provide time-limited cash assistance to refugees who are ineligible for Temporary Assistance for Needy Family (TANF), Old Age Assistance (OAA), Aid to the Blind (AB), Aid to the Permanently and Totally Disabled (APTD), Aid to the Aged, Blind, and Disabled (AABD), or Social Security Supplemental Income (SSI).

Refugee Medical Assistance (RMA) provides medical assistance to refugees who are ineligible for any other North Carolina Medicaid program or Children's Health Insurance Program (CHIP).

The Refugee Assistance Program (RAP) Support Services Program provides specifically defined and designated services to refugees to facilitate their achieving self-support and self-sufficiency as quickly as possible following their arrival in North Carolina. The program provides funding for refugee-specific social services that are linguistically and culturally appropriate.

Refugee service providers may be public or private, not-for-profit agencies that provide direct services specifically designed to:

- (1) Assist refugees in obtaining the skills which are necessary for economic self-sufficiency, including job readiness, skills training, vocational education, job placement, employment follow-up, and other employment services.
- (2) Provide training in English when needed; and
- (3) Provide social adjustment services such as case management, cultural orientation, health-management, and support services such as interpretation/translation and transportation.

The Services to Elderly Refugees Program addresses the unique barriers older refugees' face, especially regarding accessing mainstream aging services and acquisition of the English language. Activities covered under the grant include: Nutritional Services, Health Education and Screening Services, Senior Center Activities, Transportation, Interpreter Services, English Language Instruction, Citizenship and Civics Instruction. In addition, the program links elders to Citizenship and Naturalization Service Providers for preparation and legal representation through Board of Immigration Appeals (BIA) recognized agencies and their accredited representatives.

The Refugee School Impact grant assists refugee school-age children with academic performance and social adjustment to schools. It also provides parental support services to parents regarding their participation in their child's educational progress. Services and activities are aimed at providing activities/assistance that will enable optimal progress in the child's academic, physical, social, emotional and behavioral development. The focus of services should be on those who need help the most: new arrivals who are making initial

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adjustments, and those who have been in the country three years or less, and continue to face serious challenges. Programs should be geared toward school completion, acceptable academic performance, and the creation of opportunities to encourage full participation of refugee children and their parents in a wide range of school activities.

The Youth Mentoring program's goals are to promote positive civic and social engagement and 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.

### **93.576 Refugee and Entrant Assistance Discretionary Grants**

The Refugee Health Program encompasses a comprehensive, statewide approach for refugee health and has identified the following objectives: Promoting Health Literacy and reducing gaps in Health Services.

Throughout this supplement the term "refugee" will refer to all groups mentioned below that are eligible for Refugee Cash, Medical Assistance and Support Services. Eligible recipients include refugees, Cuban and Haitian entrants, certain Amerasian Immigrants, Victims of Human Trafficking, Afghani or Iraqi Special Immigrant Visa holders and persons granted asylum. Refugee Support Services are provided without regard to income. Most support services are provided to refugees during their first 60 months in country. However, there are certain services with no time limit and these are outlined in the RAP Manual found online at [RAP Manual](#) Services are closed once eligible "refugees" become a United States citizen.

## **II. PROGRAM PROCEDURES**

### **93.566**

The RCA and RMA programs are administered at the federal level by the Office of Refugee Resettlement (ORR), Administration for Children and Families (ACF), a component of the U. S. DHHS. Funding is provided to the State, based on a State Plan and amendments, as required by changes in statutes, rules, regulations, interpretations, and court decisions, submitted to and approved by ORR. RCA and RMA funds are 100% federal. In NC, RCA and RMA are state-supervised and locally-administered public assistance programs.

County Department of Social Services (DSS) offices are reimbursed for their administrative costs through the submission of the form DSS-1571 Administrative Costs Report to the NC DHHS Controller's Office.

Applicants must apply for RCA in the county in which they reside for direct payments issued by the state. The county department of social services is responsible for ensuring that only eligible refugees are approved for RCA based on federal regulations as outlined in the State's manual. Refugee Cash Assistance policies/procedures are consistent with the provisions of NC Work First Family Assistance (WFFA) program in regard to: (1) the determination of initial and on-going eligibility (treatment of income and resources, budgeting methods, need standard); (2) the determination of benefit amounts (payment levels based on size of the assistance unit, income disregards) and (3) proration of shelter, utilities, and similar needs as referenced in the Refugee Assistance Program Manual - located at: [RAP Manual](#)

The following will not be counted as income and resources for RCA eligibility:

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1. A refugee's resources remaining in the applicant's country of origin;
2. A sponsor's income and resources; and
3. Any cash grant received by the applicant under the U.S. Department of State Reception and Placement program.

**Assistance will begin the month in which the refugee applies for cash assistance, so long as the person is within eight months of arrival in the country.**

Eligibility determination is to be completed within 30 days from the date of application. The county department of social services must notify the refugee applicant or resettlement agency of the fact that the refugee has applied for cash or medical assistance and the decision regarding the applicant's eligibility.

NC Work First Family Assistance (WFFA) work requirements do not apply to RCA applicants or recipients. In counties where most refugees are resettled, refugee service providers are the work registration site and provide employment services to those refugees who are RCA recipients. In counties where there is not a refugee service provider, the work registration referral is made to the local Employment Security Commission office.

Refugee Medical Assistance follows Medicaid policy and applications. RMA eligibility is based on 200% of the Federal Poverty Level. On the date of application, cash received from the US DOS's Reception and Placement program, US DHHS/ORR's Match Grant or RCA Program should not be counted as income. Clients who lose eligibility for cash assistance due to employment during the first 8 months are to be transferred to RMA without an eligibility redetermination. A refugee who has been denied or terminated from RCA does not impact eligibility for RMA.

### **93.566 and 93.576**

Refugee Support Services, Services for Elderly Refugees, School Impact, Youth Mentoring, and Health Promotion programs are administered at the federal level by the Office of Refugee Resettlement (ORR), Administration for Children and Families (ACF), a component of the U. S. Department of Health and Human Services (DHHS). Funding is provided to the State, based on a State Plan and amendments, as required by changes in statutes, rules, regulations, interpretations as submitted to and approved by ORR. Funding is 100% federal.

State-level contracts for the actual provision of services are awarded between the Division of Social Services and public or private, nonprofit agencies. Agencies must provide refugee-specific services which are linguistically and culturally appropriate. Agencies interested in providing Refugee Support Services prepare and submit a contract application which includes a description of services to be offered, as well as a line-item budget. The State utilizes the DHHS Office of Procurement and Contract Services (OPCS) policies and procedures to award contracts to sub-recipients. Federal and State reporting requirements are communicated to sub-recipients in the contract. Compliance and Service requirements are contained in the Refugee Assistance Program Services Manual, found online at: [RAP Manual](#). Refugee Support Services program sub-recipients are monitored by the NC State Refugee Office in accordance with the NC Division of Social Services (DSS) Local Social Service Agencies Monitoring Plan. Sub-recipients are reimbursed through submission of the DSS-1571 III. Administrative Costs Report to the NC DHHS Controller's Office.

Refugee Support Services funds are provided to refugees in the following order of priority:  
(a) All newly-arriving refugees during their first year in the U. S., who apply for services; (b) Refugees who are receiving cash assistance; (c) Unemployed refugees who are not

## **REFUGEE AND ENTRANT ASSISTANCE CLUSTER, STATE ADMINISTERED PROGRAMS**

receiving cash assistance; and (d) Employed refugees in need of services to retain employment or to attain economic independence.

Services to Elderly Refugees - to determine sub-recipients, the NC State Refugee Office analyzes arrival statistics of elderly refugees from the U. S. Department of State's data system, the World Refugee Admissions Processing System (WRAPS). Based upon this data, the State Refugee Office determines which regions are most impacted by newly-arrived elderly refugees, and notifies these eligible regions of the availability of funds which they may access and services to be provided, through the State's contracting process. The State utilizes the DHHS Office of Procurement and Contract Services (OPCS) policies and procedures to award contracts to sub-recipients. Federal and State reporting requirements are communicated to sub-recipients in the contract. Eligibility requirements are communicated in the Refugee Assistance Program Services Manual, found online at: [RAP Manual](#). Elderly Refugee Project sub-recipients are monitored by the NC State Refugee Office in accordance with the NC Division of Social Services (DSS) Monitoring Plan. Sub-recipients are reimbursed through submission of the form DSS-1571 III Administrative Costs Report to the NC DHHS Controller's Office.

School Impact - to determine sub-recipients, the NC State Refugee Office analyzes arrival statistics of school-aged refugee children from the U. S. Department of State's data system, the World Refugee Admissions Processing System (WRAPS). Based upon this data, the State Refugee Office determines which county school districts are most impacted by newly arrived refugee children and notifies these eligible districts of the availability of funds, which they may access, and services to be provided, through the State's contracting process.

Youth Mentoring – to determine sub-recipients, the NC State Refugee Office analyzes arrival statistics of youth age participants (15-24) from the U. S. Department of State's data system, the World Refugee Admissions Processing System (WRAPS). Based upon this data, the State Refugee Office determines which regions can benefit most from these youth-based programs. Federal and State reporting requirements are communicated to sub-recipients in the contract.

### **93.576**

Based upon federal determination, these funds are made available to sub recipients in eligible counties through the NC State Refugee Office.

### **III. COMPLIANCE REQUIREMENTS**

Noted below in the following matrix are the types of compliance requirements that are applicable to the federal program. These Types are determined by the federal agency, noted as "Y," on the "Matrix of Compliance Requirements" located in Part 2 of the OMB 2021 Compliance Supplement; however, the State Agency may have added the Type and this is noted by "Y." If the State determines that the federal requirement does not apply at the local level or if the State modifies the federal requirements, this is noted in the supplement under the type of compliance requirement. If the federal and/or State agencies have determined that the type is not applicable, it is noted by "N."

If the Matrix indicates "Y," the auditor must determine if a particular type of compliance requirement has a direct and material effect on the federal program for the auditee. For each such compliance requirement subject to the audit, the auditor must use the OMB 2021 Compliance Supplement, Part 3 (which includes generic details about each compliance requirement other than Special Tests and Provisions) and Part 4 (which includes any program-specific requirements) to perform the audit.

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If there is no program listed on the “Matrix” in Part 2 or Part 4, the State has determined the Type that is applicable. If a Type is determined to be direct and material, the auditor should refer to the requirements found in Part 3 and listed in this supplement.

CC	A	B	C	E	F	G	H	I	J	L	M	N
Cross Cutting Requirements	Activities Allowed or Unallowed	Allowable Costs/Cost Principles	Cash Management	Eligibility	Equipment/ Real Property Management	Matching, Level of Effort, Earmarking	Period Of Performance	Procurement Suspension & Debarment	Program Income	Reporting	Subrecipient Monitoring	Special Tests and Provisions
Y	Y	Y	Y	Y	N	Y	Y	N	N	Y	Y	N

**Crosscutting Requirements**

The compliance requirements in the Division of Social Services “Crosscutting Requirements” in Section D (Supplement #DSS-0) are applicable to this grant.

**A. ACTIVITIES ALLOWED OR UNALLOWED**

**93.566**

**Refugee Cash Assistance**

County departments of social services must allow any refugee wishing to do so an opportunity to apply for cash assistance and must determine the eligibility of each applicant. Refugees who are enrolled in the Federal Match Grant Program with their local resettlement agency are prohibited from receiving Refugee Cash Assistance while on Match Grant. The local resettlement agency is to notify the county department of social services of any refugees enrolled in the Match Grant Program.

If the county department of social services determines that a refugee has an urgent need for cash assistance, it should process the application for cash assistance as quickly as possible and issue the initial payment to the refugee on an emergency basis. Continued receipt of Refugee Cash Assistance is dependent on a recipient participating in employment services within 30 days of receipt of aid. A Family Self-sufficiency Plan must be developed with each recipient. A Family Self-sufficiency Plan addresses the employment-related service needs of the employable members in a family for the purpose of enabling the family to become self-supporting as quickly as possible through the employment of one or more family members. In addition, an Individual Employability Plan must be developed for each recipient of Refugee Cash Assistance in a filing unit who is not exempt from work requirements.

**Refugee Medical Assistance**

Refugees are not required to receive Refugee Cash Assistance (RCA) in order to receive Refugee Medical Assistance (RMA). Applicants may apply for either or both RCA and RMA.

Refugees are eligible for Refugee Medical Assistance only after being determined ineligible for North Carolina Medicaid/CHIP.

## **REFUGEE AND ENTRANT ASSISTANCE CLUSTER, STATE ADMINISTERED PROGRAMS**

If RCA benefits are terminated due to increased earnings, and the refugee is also a recipient of RMA, the client shall continue to receive RMA until they reach the end of their eligibility time period. In cases where a refugee obtains private medical coverage, any payment of RMA for that individual must be reduced by the amount of the third-party payment.

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#### **Support Services, Services to Elderly Refugees, Health Promotion, Youth Mentoring**

Allowable activities include but are not limited to:

Case Management, Outreach, Assessment, Pre-employment Services, Job Development, Job Placement, Employment Follow-up, English Language Training, Vocational Skills Training, Vocational Education, Skills Recertification, Transportation, Information and Referral, Emergency Services, Health Related Services, Home Management Services, Orientation Services, Driver's Education Training, Citizenship and Naturalization services including U. S. Civics Instruction and English Language Civics Instruction, and Translation/Interpreter Services, Civic and Social Engagement, Educational and Vocational Advancement.

Employment services for all non-exempt, employable adults must include a written Family Self Sufficiency Plan and individual Employability Plan and must include services designed to enable refugees to obtain jobs within one year of becoming enrolled. Employability plan means an individualized written plan for a refugee registered for employment services that sets forth a program of services intended to result in the earliest possible employment of the refugee. Employment services may continue to be provided after a refugee has entered a job to help the refugee retain employment or upgrade to a better job.

#### **Youth Mentoring**

Allowable activities include but are not limited to: Civic and Social Engagement, Educational and Vocational Advancement, Case Management, Outreach, Transportation, Information and Referral, Translation/Interpreter Services, Mentoring programs, After-school/summer programs that support remedial work or promote college readiness.

#### **School Impact**

Allowable activities may include: English as a Second Language, Utilization of school curricula that encourage optimum learning and acquisition of necessary skills, After-school tutoring programs focused on helping refugee students understand and complete assignments, After-school/summer programs that support remedial work or promote school readiness, Parental involvement programs, Mentoring programs, Interpreter services for parent/teacher meetings and conferences, Bilingual/bi-cultural counselors and aides, Training staff on refugee culture and use of special teaching materials, Utilization of modern technology deemed to speed up English language acquisition and other related skills, Utilization of special educational materials proven to help children with learning disabilities and Programs enhancing linguistic and cultural competence in service provision.

A written copy is available by written request at the following address:

Allison Smith, Assistant Chief

## **REFUGEE AND ENTRANT ASSISTANCE CLUSTER, STATE ADMINISTERED PROGRAMS**

Department of Health and Human Services  
Family and Economic Services  
Hargrove Building/ Dix Campus  
MSC 2420  
Raleigh, North Carolina 27699-2420  
or by calling the Deputy Director at (919) 527-6311.

### **B. ALLOWABLE COSTS/COSTS PRINCIPLES**

#### **93.566 Cash and Medical**

All grantees that expend state funds (including federal funds passed through the N. C. Department of Health and Human Services) are required to comply with the cost principles described in the N. C. Administrative Code at 09 NCAC 03M .0201.

#### **93.566 and 93.576**

All allowable costs, direct and indirect, of Refugee Support Services contractors receiving these funds shall be allocated in accordance with the cost allocation plan mandated under Title 45 of the Code of Federal Regulations, Part 95, Subpart E. Contract providers must show specific, allowable costs in the budget of the contract approved by the Division of Social Services.

Support service funds may not be used for long-term training programs such as vocational training that last for more than a year or educational programs that are not intended to lead to employment within a year.

#### **93.566 Refugee Cash and Medical**

Monitoring is conducted in accordance with the requirements of 2 CFR, Part 200 and the DHHS Policy and Procedure Manual for Monitoring of Programs. The DHHS Policy and Procedure Manual for Monitoring of Programs can be obtained from the DHHS Controller's Office, Dorothea Dix Campus/McBryde Building, 1050 Umstead Drive 2019 MSC, Raleigh, NC 27699-2019. In addition, the NC Division of Social Services prepares a monitoring plan for monitoring sub-recipient compliance with Federal and State awards. A copy of the NC Division of Social Services' Local County Social Service Agencies Monitoring Plan may be found at: [NC Local County Social Service Agencies Monitoring Plan](#)

Monitoring of Contracted Refugee Support Services providers is conducted in accordance with the NC Local County Social Service Agencies Monitoring Plan,

This includes compliance with the Federal Office of Management and Budget (OMB) CFR Title 2 Part 200 which may be accessed at [Federal Office of Management and Budget \(OMB\) CFR Title 2 Part 200](#)

Onsite monitoring visits are conducted periodically with service providers. The monitoring visit includes an administrative review, client record review, limited fiscal review, observation of service delivery, interviews with key personnel, clients, community partners and employers. A desk review occurs monthly to assess fiscal expenditures and service performance.



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Significant findings are communicated both verbally at the time of an exit interview and in writing within 30 days after the monitoring visit. If the findings require a refugee service provider to implement a performance improvement plan, it must be submitted to the State Refugee Office (SRO) within 30 days after receipt of the report. SRO staff will follow up after submission of the Performance Improvement Plan (PIP) to verify that corrective action has been implemented.

Monitoring forms, related verification information, compliance findings, performance improvement plans, follow-up documentation and related correspondence will be maintained in the NC Refugee Assistance Program Office located in the Hargrove Building/Dorothea Dix Campus, 820 S. Boylan Avenue, Raleigh, NC. Such records will be maintained according to the state's record retention policy.

All grantees that expend state funds (including federal funds passed through the N. C. Department of Health and Human Services) are required to comply with the cost principles described in the N. C. Administrative Code at 09 NCAC 03M .0201.

### **C. CASH MANAGEMENT**

County Department of Social Services Agencies and all grantees are funded on a reimbursement basis; therefore, this requirement does not apply.

### **E. ELIGIBILITY**

#### **93.566**

In order to receive refugee cash and/or medical assistance, the client must be a Refugee, admitted under INA § 207; Asylees, granted asylum under INA § 208; Cuban and Haitian Entrants, as defined under federal regulations (45 CFR § 401.2); Certain Amerasians; Trafficking Victims who have been issued an ORR certification letter; Special Immigrant Visa holders from Iraq and Afghanistan; and Legal Permanent Residents (LPR) who were admitted originally as one of the above in the past, for eight months after arrival. The county department of social services providing these benefits must review documentation from the United States Citizenship and Immigration Services (USCIS), which verifies the applicant's status. This documentation is usually the U. S. Department of Homeland Security (DHS) Arrival Departure Record Form I-94 and/or the USCIS Permanent Resident Alien Card I-551. However, other forms of official U. S. Department of Homeland Security or U. S. Department of Justice documentation may also be used.

**Compliance Requirement** – The county department of social services must determine whether refugee applicants for Refugee Cash Assistance are eligible for other cash assistance programs, such as the Work First/TANF program. If the county department of social services determines that the refugee applicant is not eligible for cash assistance under other programs, then the agency determines eligibility for Refugee Cash Assistance.

The county department of social services must refer refugee applicants for Refugee Cash Assistance who are aged, blind or disabled to the Social Security Administration to apply for cash assistance under the SSI program. A refugee eligible for Refugee Cash Assistance as well as SSI, may receive RCA until eligibility for SSI is determined, provided the conditions of eligibility for Refugee Cash Assistance continue to be met during this time.

## **REFUGEE AND ENTRANT ASSISTANCE CLUSTER, STATE ADMINISTERED PROGRAMS**

**Audit Objective** – To determine that applicants were assigned to RCA only after determined ineligible for other programs such as Work First/TANF Program.

**Suggested Audit Procedures:**

1. Test a sample of sub-recipient records and ascertain that all required documents are present.
2. Review the requirements in the Refugee Assistance Manual for each of the documents listed above and test for completeness and accuracy.

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To receive Refugee Support Services the client must be a Refugee, admitted under INA § 207; Asylees, granted asylum under INA § 208; Cuban and Haitian Entrants, as defined under federal regulations (45 CFR § 401.2); Certain Amerasians; Trafficking Victims who have been issued an ORR certification letter; Special Immigrant Visa holders from Iraq and Afghanistan; and Legal Permanent Residents (LPR) who were admitted originally as one of the above in the past.

To receive Services to Elderly Refugees, the client must be age 60 or older AND the client must be a Refugee, admitted under INA § 207; Asylees, granted asylum under INA § 208; Cuban and Haitian Entrants, as defined under federal regulations (45 CFR § 401.2); Certain Amerasians; Trafficking Victims who have been issued an ORR certification letter; Special Immigrant Visa holders from Iraq and Afghanistan; and Legal Permanent Residents (LPR) who were admitted originally as one of the above in the past.

To receive Refugee School Impact Services, the client must be a Refugee, admitted under INA § 207; Asylees, granted asylum under INA § 208; Cuban and Haitian Entrants, as defined under federal regulations (45 CFR § 401.2); Certain Amerasians; Trafficking Victims who have been issued an ORR certification letter; Special Immigrant Visa holders from Iraq and Afghanistan; Children classified as Special Immigrant Juveniles (SIJs) receiving services from the ORR-funded Unaccompanied Refugee Minor (URM) programs and Legal Permanent Residents (LPR) who were admitted originally as one of the above in the past.

Most eligible are newly arrived refugee school-age children, specifically those that are ages 5 to 18 and have been in the United States (U.S.) 1 year or less. Additionally, those refugee children who have been in the U.S. 3 years or less, but are continuing to face persistent challenges in schools, are also eligible under Refugee School Impact.

To receive Youth Mentoring Services, the client must be a Refugee, admitted under INA § 207; Asylees, granted asylum under INA § 208; Cuban and Haitian Entrants, as defined under federal regulations (45 CFR § 401.2); Certain Amerasians; Trafficking Victims who have been issued an ORR certification letter; Special Immigrant Visa holders from Iraq and Afghanistan; Children classified as Special Immigrant Juveniles (SIJs) receiving services from the ORR-funded Unaccompanied Refugee Minor (URM) programs and Legal Permanent Residents (LPR) who were admitted originally as one of the above in the past.

**Audit Objective** – To determine that applicants were determined eligible for services.

**Suggested Audit Procedures:**

## **REFUGEE AND ENTRANT ASSISTANCE CLUSTER, STATE ADMINISTERED PROGRAMS**

1. Test a sample of sub-recipient records and ascertain that all required documents are present.
2. Review the requirements in the Refugee Assistance Manual for each of the documents listed above and test for completeness and accuracy.

### **H. PERIOD OF PERFORMANCE**

#### **93.566 and 93.576**

Local County Social Services Agencies and Grant funded recipients receive funds on a reimbursement basis. This requirement has not been passed down by the State and does not apply.

### **I. PROCUREMENT & SUSPENSION & DEBARMENT**

#### Procurement

#### **93.566 and 93.576**

All grantees that expend federal funds (received either directly from a federal agency or passed through the N. C. Department of Health and Human Services) are required to conform to federal agency codifications of the grants management common rule accessible on the Internet at <http://www.whitehouse.gov/omb/>.

All grantees that expend State funds (including federal funds passed through the N. C. Department of Health and Human Services) are required to comply with the procurement standards described in the North Carolina General Statutes and the North Carolina Administrative Code. Nongovernmental sub-recipients shall maintain written procurement policies that are followed in procuring the goods and services required to administer the program.

#### Suspension and Debarment

#### **93.566 RCA and RMA**

**Compliance Requirement** – The county department of social services must determine whether refugee applicants for Refugee Cash Assistance are eligible for other cash assistance programs, such as the Work First/TANF Program. If the county department of social services determines that the refugee applicant is not eligible for cash assistance under other programs, then the agency determines eligibility for Refugee Cash Assistance.

The county department of social services must refer refugee applicants for Refugee Cash Assistance who are aged, blind or disabled to the Social Security Administration to apply for cash assistance under the SSI program. A refugee eligible for Refugee Cash Assistance as well as SSI, may receive RCA until eligibility for SSI is determined, provided the conditions of eligibility for Refugee Cash Assistance continue to be met during this time.

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**Compliance Requirement** – Non-federal entities are prohibited from contracting with or making sub-awards under covered transactions to parties that are suspended or debarred or whose principals are suspended or debarred.

## **REFUGEE AND ENTRANT ASSISTANCE CLUSTER, STATE ADMINISTERED PROGRAMS**

**Audit Objective** – To determine that no contract was awarded to any party that has been suspended or debarred or whose principals have been suspended or debarred.

**Suggested Audit Procedures:**

1. Test a sample of contracts and ascertain if the required suspension and debarment certifications were received for sub-awards and covered contracts.
2. Test a sample of contracts to the List of Parties Excluded from Federal Procurement or Non-Procurement Programs, issued by the general services administration and ascertain if contracts were awarded to suspended or debarred parties.

### **L. REPORTING**

#### **93.566**

The Refugee Cash Assistance, Refugee Medical Assistance, Refugee Support Services, Services for Elderly Refugees, School Impact, Health Promotion, and Youth Mentoring programs are required to report financial data on form SF-425 quarterly. Each expenditure report must be submitted within 30 days following the end of each fiscal quarter (i.e., no later than January 30, April 30, July 30 and October 30) (See 45 CFR 400.11(c).) A final expenditure report is due 90 days after the last day of the second Federal Fiscal Year following the year for which these funds were awarded (i.e., December 30 – 90 days after September 30, Federal Fiscal Year). Additionally, the State must submit a separate performance report for the program using form ORR-6. OMB Control No. 0970-0036 on a semi-annual basis.

These are reporting requirements of the State which have not been passed down to subrecipients; therefore, additional testing is not required.

### **M. SUBRECIPIENT MONITORING**

County Social Service Agencies are monitored in accordance with the NC Division of Social Services Local Social Service Agencies Monitoring Plan, found at:

<https://files.nc.gov/ncdhhs/documents/files/dss/monitoring/NC-Local-County-Social-Service-Agencies-Monitoring-Plan-2019.pdf>