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.

I. PROGRAM OBJECTIVES

The Refugee Assistance Program (RAP) Social 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 as well as job placement and 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.

Throughout this supplement the term “refugee” will refer to all groups mentioned below that are eligible for Refugee Cash or Medical Assistance. 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 social services are provided without regard to income. Most Social 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 http://info.dhhs.state.nc.us/olm/manuals/dss/ei-80/man/). Services are closed once eligible “refugees” become a United States citizen.

II. PROGRAM PROCEDURES

The Refugee Social Services program is 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 Social 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 subrecipients. Federal and State reporting requirements are communicated to subrecipients in the contract. Eligibility requirements are communicated in the Refugee Assistance Program Services Manual, found online at: http://info.dhhs.state.nc.us/olm/manuals/dss/ei-80/man/. Refugee Social Services program subrecipients are monitored by the NC State Refugee Office in accordance with the NC Division of Social Services (DSS) Monitoring Plan. Subrecipients are reimbursed through submission of the DSS-1571 III. Administrative Costs Report to the NC DHHS Controller’s Office.

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

III. COMPLIANCE REQUIREMENTS

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

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 including 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.

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.

Service requirements are contained in the Refugee Assistance Program Manual which may be obtained online at the following web address: http://info.dhhs.state.nc.us/olm/manuals/dss/ei-80/man/. A written copy is available by written request at the following address:

Ms. Marlene Myers, NC State Refugee Coordinator
N. C. Department of Health and Human Services
NC Refugee Program
Hargrove Building/Dix Campus
MSC 2405

or by calling the State Refugee Coordinator at (919) 527-6304.

B. ALLOWABLE COSTS/COSTS PRINCIPLES

All allowable costs, direct and indirect, of contract Refugee Social Services provider 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.

Social 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.

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.

E. ELIGIBILITY

In order to receive Refugee Social Services, the client must be a refugee, Cuban or Haitian Entrant, Amerasian immigrant, a victim of human trafficking, a person granted asylum, or an Iraqi/Afghani special immigrant for eight months after arrival. The agency providing the services must maintain documentation in the form of copies of information from the United States Department of Homeland Security (DHS). This documentation is usually a US Department of Homeland Security Arrival/Departure Record (Form I-94) and/or the United States Citizenship & Immigration Services (USCIS) Permanent Resident Alien Card I-551.
commonly referred to as “green card”. However, other forms of official USCIS documentation may also be used. In addition, the agency providing the services must have determined the client’s eligibility for, and provided the services, as outlined in the North Carolina State Plan.

Limitations on eligibility for services:

1. Refugee Social Services may be provided to refugees who are 16 years of age or older and who are not full-time students in elementary or secondary school, except that such a student may be provided services in order to obtain part-time or temporary (e.g., summer employment) while a student or full-time permanent employment upon completion of schooling.

2. Once refugees become U. S. citizens, they are no longer eligible for services under the refugee program.

H. PERIOD OF AVAILABILITY OF FEDERAL FUNDS

Federal funds from the RAP Social Services Allocation must be obligated no later than two years after the end of the federal fiscal year and liquidated no later than three years after the end of the federal fiscal year.

I. PROCUREMENT & SUSPENSION & DEBARMENT

Procurement

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/](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, which are identified in the State of North Carolina Agency Purchasing Manual. Nongovernmental subrecipients shall maintain written Procurement policies that are followed in procuring the goods and services required to administer the program.

Suspension and Debarment

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.

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:

a. Test a sample of contracts and ascertain if the required suspension and debarment certifications were received for sub-awards and covered contracts.

b. Test a sample of contracts to the List of Parties Excluded From Federal Procurement or Nonprocurement Programs, issued by the General Services Administration and ascertain if contracts were awarded to suspended or debarred parties.

L. REPORTING

This program is 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 3). Additionally, the State must submit a separate performance report for the program using form ORR-6. OMB Control No. 0970-0036.

M. SUBRECIPIENT MONITORING

Subrecipient monitoring is conducted in accordance with the requirements of OMB Circular A-133 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’ monitoring plan can be obtained from the Budget and Contracts Office of the NC Division of Social Services, 325 N. Salisbury Street, MSC 2415, Raleigh, NC 27699-2415, telephone (919) 334-1027.

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

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 corrective action, it must be submitted to the State Refugee Office within 30 days after receipt of the report. SRO staff will follow up after submission of the Corrective Action Plan to verify that corrective action has been implemented.

Monitoring forms, related verification information, compliance findings, corrective action 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.