

December 23, 2022

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 22-102

The purpose of this All County Letter (ACL) is to inform counties that the federal Office of Refugee Resettlement (ORR) has updated the annual ORR-5 data collection tool and expanded the Family Self Sufficiency Plan requirements completed by Refugee Impacted Counties providing Refugee Support Services, resulting in new data that counties are required to collect and submit to CDSS for all ORR-eligible populations receiving refugee services.



KIM JOHNSON
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



GAVIN NEWSOM
GOVERNOR

December 23, 2022

ALL COUNTY LETTER NO. 22-102

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CALWORKs PROGRAM MANAGERS
ALL COUNTY FISCAL OFFICERS
ALL COUNTY CONSORTIUM PROJECT MANAGERS
ALL COUNTY REFUGEE COORDINATORS

SUBJECT: CHANGES TO THE REFUGEE DATA SUBMISSION SYSTEM
FOR FORMULA FUNDS ALLOCATIONS (ORR-5)

REFERENCE: [STATE LETTER 05-20 - REVISED HEALTH AND HUMAN SERVICES GUIDANCE TO FEDERAL FINANCIAL ASSISTANCE RECIPIENTS REGARDING TITLE VI PROHIBITION AGAINST NATIONAL ORIGIN DISCRIMINATION AFFECTING LIMITED ENGLISH PROFICIENT PERSONS; POLICY LETTER \(PL\) 19-07 AND PL 21-06 - FAMILY SELF-SUFFICIENCY PLAN REQUIREMENTS TO PROMOTE SELF-SUFFICIENCY AND INTEGRATION; DEAR COLLEAGUE LETTER \(DCL\) 21-13- REVISION TO THE REFUGEE DATA SUBMISSION SYSTEM; 45 CODE OF FEDERAL REGULATIONS \(CFR\) §§ 400.154; 400.156\(g\); 400.55; AND 400.71](#)

This All County Letter (ACL) informs County Welfare Departments (CWD) that effective October 1, 2021, the federal Office of Refugee Resettlement (ORR) has begun requesting additional data collection for ORR-eligible populations receiving Refugee Cash Assistance (RCA) and expanded data collection for ORR-eligible populations receiving Refugee Support Services (RSS), for annual data submission. Furthermore, this letter informs Refugee Impacted Counties of new Family Self Sufficiency Plan (FSSP) requirements. For the purposes of this letter, "Refugee Impacted Counties" are those counties receiving RSS funding allocations. Refugee Impacted Counties include Alameda, Los Angeles, Orange, Sacramento, San Francisco, Santa Clara, San Diego and Stanislaus. While all counties administer RCA, only eight counties are currently administering RSS. As such, if available, CWDs should include this data in the ORR-5 Refugee Data Submission System for Formula Funds Allocations (ORR-5) as of the

initial effective date. Beginning October 1, 2022, all Refugee Impacted Counties must follow the requirements of [PL 21-06](#) when completing the FSSP.

Background

On July 20, 2021, ORR released [Dear Colleague Letter 21-13](#), describing changes to the data fields and additional data fields added to the ORR-5, and a related letter, [Policy Letter 21-06](#), providing guidance on the expanded requirements and data collection for the FSSP. **The FSSP requirements only apply to Refugee Impacted Counties.**

ORR-5 Data Collection

The ORR-5 data described in DCL 21-13 provides information regarding populations enrolled in RCA, Refugee Medical Assistance (RMA), Refugee Medical Services (RMS), and RSS. To comply with federal reporting requirements, CDSS requests and compiles the ORR-5 data from counties, and then submits the report to ORR on an annual basis. This data informs ORR's assessment of cash and medical assistance utilization and the continuum of services provided. It also aids ORR in determining the annual state allocations for the RSS program using data on: Refugees, Asylees, Cuban/Haitian Entrants, Special Immigrant Visa Holders, Victims of Trafficking, and Afghan and Ukrainian Humanitarian Parolees. **Note that CDSS is not collecting RMA and RMS data; therefore, RMA and RMS data fields (included in ORR's report template) are not included here because CWDs are NOT required to submit any RMA and RMS data in this report.**

ORR has expanded the ORR-5 to include additional data fields as detailed in DCL 21-13. While the prior version consists of a single section, the updated version is divided into three sections, as follows:

- Section I includes demographic and service data.
- Section II includes data fields pertaining to RSS FSSP.
- Section III includes RSS FSSP follow-up questions to be collected 12 months after an individual has been enrolled into RSS.

Data Fields Required of all 58 CWDs

The following table lists all the data fields to be collected and submitted by **all** CWDs providing RCA and/or RSS services (additional data fields in the updated version are marked "new data field").

Data Fields Section I
1. Alien Number
2. Principal Applicant (PA) Alien Number (new data field)
3. Relationship to PA (new data field)
4. First Name
5. Middle Name
6. Last Name
7. DOB
8. Status
9. Gender
10. Nationality
11. Zip Code (new data field)
12. City (new data field)
13. County
14. Eligibility Date
15. Migration Status
16. Date of Migration
17. RCA Enrollment Date
18. RCA Exit Date

Data Fields Required of Refugee Impacted Counties

The following tables list data fields to be submitted **only** by Refugee Impacted Counties. All data fields in Sections II and III are new data points to be collected and submitted by counties receiving RSS funds:

Data Fields Section I
1. RSS Enrollment Date
2. RSS Exit Date

Data Fields Section II [new fields]
3. RSS FSSP English Ability
4. RSS FSSP Education Level
5. RSS FSSP Initial Primary Goal (G1)
6. RSS FSSP Initial Referral Relevant to G1

Data Fields Section III [new fields]
7. Alien Number
8. RSS FSSP Initial Primary Goal Met?
9. RSS FSSP Employment Status
10. RSS FSSP Total Number of Months Employed Full-Time

Data Fields Section III [new fields]
11. RSS FSSP Total Number of Months Employed Part-Time
12. RSS FSSP First Employed Date
13. RSS FSSP Best Hourly Wage
14. RSS FSSP How was 12-Month Followed-Up Information Collected

New FSSP Requirements for Refugee Impacted Counties

The FSSP is defined in [45 CFR § 400.71](#) and required by [45 CFR § 400.156\(g\)](#), for anyone who receives employment-related services funded by RSS in one of the Refugee Impacted Counties. It focuses on an individual's strengths and goals and is an opportunity for providers to develop a plan in partnership with the whole family and identify needed services to reduce barriers to becoming economically self-sufficient.

ORR has expanded the FSSP to include assessing and identifying needs for each member of the family (including children) in the household if at least one adult is seeking RSS employability services as defined in [45 CFR § 400.154](#). The FSSP must be completed within 30 days of enrollment in RSS employability services. If a client has limited English proficiency, CWDs must ensure that the FSSP is translated into the primary language of the client, or that an interpreter was provided as required by [ORR State Letter 05-20](#).

Counties are not required to use a specific form or refer to their assessment as a FSSP. CWDs, in coordination with their RSS service providers and/or systems, may develop or use their own processes and systems to conduct assessments, make referrals, and conduct follow-up activities, as long as those assessments, referrals and follow-up activities are clearly documented in the case file. Assessments, referrals and follow-up activities must also be included in the reports provided to CDSS and comply with ORR reporting requirements as outlined in the revised ORR-5.

Effective October 1, 2021, ORR PL 21-06 superseded ORR PL 19-07 with respect to FSSP requirements. The new requirements include:

1. A comprehensive initial assessment for each family member in the household (including children) that includes:
 - a. Strengths/assets
 - b. Stressors/barriers
 - c. Strategies for overcoming barriers

CWDs must ensure all adults in the family are interviewed, receive a needs assessment, and are provided referrals to services, as appropriate. Information

about a child's needs shall be obtained by interviewing the adults in the family.

2. A family budget that includes itemized expenses and source(s) of income and earnings that contribute to a family's ability to achieve economic self-sufficiency.
3. An Individual Employability Plan (IEP) for employable adult(s).
4. Self-reported English language ability and education level for individuals 16 years of age and older.
5. Short-term and long-term goals, including at least one primary goal for each adult and child in the household. Additional barriers and goals identified during the assessment must be recorded in the case file. If, after careful consultation with the client, there is an inability to identify a goal for inclusion in the FSSP, the case file should indicate that no goal was identified. ORR defines the initial primary goal as the one that will address the most critical obstacle an individual will need to overcome by the end of 12 months to work towards the family's longer-term self-sufficiency and integration.
6. Referral(s) to ORR and non-ORR funded services to pursue the goals identified. The initial primary referral relevant to the initial primary goal must be documented in the case file. Referrals to address other goals must also be documented in the case file.
7. A follow-up assessment of progress at 6 and 12 months.

Requirements for Follow-up Assessments of Client Progress

Refugee Impacted Counties and/or their designees are required to have regular contact with clients and must complete follow-up assessments at 6 and 12 months from the date of enrollment in RSS employability services.

Follow-up assessments of client progress ensure that a family is actively engaged and working toward meeting their goals. It also enables a state and its designee(s) to monitor the impact of the referrals and/or services provided, and the family's progress toward self-sufficiency.

Follow-up assessments must include:

1. An assessment of the progress and outcomes towards meeting the previously established short- and long-term goals. The client's status at 12 months (in

relationship to the initial primary goal identified upon enrollment) will fall into one of the following categories:

- a. Initial primary goal met;
 - b. Initial primary goal not met, progressing within initial referral to service(s);
 - c. Initial primary goal not met, additional referral(s) provided; or
 - d. Unable to provide information (for clients who are unreachable or unwilling to participate in follow-up activities).
2. Identification of any new barriers hindering client progress and goal(s) necessary to achieving self-sufficiency.
 3. New referrals made, if applicable.
 4. Employment status for individuals 16 years of age and older. If the client was employed at any time during the first 12 months from the date of enrollment, the case file must include:
 - a. Number of months employed full-time
 - b. Number of months employed part-time
 - c. First employment date
 - d. Best hourly wage earned
 5. A revised family budget, if appropriate.
 6. A revised IEP for adult client(s), if appropriate.

Refugee Impacted Counties must ensure that the outcomes of the 6- and 12-month follow-up assessments of progress are documented in the case file. Follow-up assessments should be attempted for clients who may have met their goals or are no longer actively receiving services. If a client remains engaged in services for more than 12 months, the nature of the services recommended, the referral(s) provided, and the client's progress toward economic self-sufficiency and/or integration must also be documented in the case file.

If a family is unreachable or has out-migrated at the 6- or 12-month mark, a CWD or its designee(s) may use their best available data from a previously conducted exit interview or case file documentation to determine the client's status.

Exceptions to General FSSP Requirements

The following are exceptions to the general requirements:

1. A FSSP is not required for an individual client enrolled only in English as a Second Language (ESL) classes for purposes other than obtaining, retaining, or upgrading a job.

For example, a FSSP is not required for clients who are already employed and are enrolled in ESL classes to improve their English language skills.

2. A new FSSP is required for a client who migrates to a new state or changes providers within a state and re-enrolls in RSS employability services as defined in 45 CFR § 400.154. The FSSP in the new location must be completed within 30 days of enrollment in RSS employability services. The follow-up assessments should take place 6 and 12 months from the date of enrollment at the secondary location.

Reporting

CWDs must begin collecting data immediately for the Federal Fiscal Year 2023 reporting period, which is October 1, 2022 through September 30, 2023. Refugee Impacted Counties should work with their service providers to update their current collection methods and begin collecting the required data and information indicated in the DCL 21-13 and PL 21-06. This information will be required in the annual submission of ORR-5 reporting.

If you have any questions or need additional guidance regarding the information in this letter, please contact the Refugee Programs Bureau at (916) 654-4356 or at RPB@dss.ca.gov.

Sincerely,

Original Document Signed By

MARCELA RUIZ, Director
Office of Equity