UPDATED COVID-19 Waiver to Extend Eligibility for Refugee Cash Assistance

TOPIC

Extend eligibility for Refugee Cash Assistance (RCA) to a maximum of 25 months for qualifying participants during the COVID-19 public health emergency. This update amends bulletin #20-06-03, by extending the end date of the waiver from 01/31/2021 to 04/30/2021.

PURPOSE

To inform counties, tribes, and community partners of the changes being made to Refugee Cash Assistance due to the COVID-19 public health emergency. The amended policy will ensure eligible Minnesotans:

- Maintain uninterrupted Refugee Cash Assistance benefits during the public health emergency.
- Regain access to Refugee Cash Assistance benefits during the public health emergency if eligibility was previously ended.

CONTACT

Submit policy questions to PolicyQuest. Contact the TSS Help Desk for all MAXIS related questions

SIGNED

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TERMINOLOGY NOTICE

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.
I. Background

Refugee Cash Assistance (RCA) provides cash benefits to persons with eligible status who are ineligible for Supplemental Security Income (SSI) or Minnesota Family Investment Program (MFIP), for up to 8 months after arrival in the United States or after an eligible immigration status is granted.

Individuals with the following immigration status are eligible for Refugee Cash Assistance:

- Paroled* or admitted as a refugee;
- Paroled* as an asylee or granted asylum;
- Victim of severe form of human trafficking;
- Iraqi and Afghan special immigrant visa;
- Certain Amerasian from Vietnam;
- Cuban and Haitian entrant.¹

The federal Office of Refugee Resettlement (ORR), which regulates the Refugee Cash Assistance program, allows States to request a waiver in response to the COVID-19 public health emergency, to extend Refugee Cash Assistance eligibility beyond the usual 8 months. The federal Office of Refugee Resettlement initially approved Minnesota’s request for the waiver, which allowed Minnesota to extend Refugee Cash Assistance eligibility up to 18 months for people who meet the qualifications specified in the waiver through 09/30/2020. On 10/01/2020, the federal Office of Refugee Resettlement extended Minnesota’s waiver through 01/31/2021. Effective 02/01/2021, the federal Office of Refugee Resettlement has now extended Minnesota’s waiver through 04/30/2021, allowing up to a maximum of 25 months of eligibility.

Legal Authority under 45 C.F.R. § 400.300
Office of Refugee Resettlement Policy Letter 20-03, 20-06, and 21-01

A. Current Refugee Cash Assistance policy

Current Refugee Cash Assistance policy provides a maximum of 8 months of eligibility, beginning on the date of entry to the United States or the date an eligible immigration status is granted.

*Paroled – Granted special permission to enter the United States.
B. New Temporary Refugee Cash Assistance Policy

The eligibility period extension is meant to assist people who have successfully exited the program and subsequently lost employment or sustained a reduction in hours which would requalify them for Refugee Cash Assistance, and current recipients whose RCA benefits would otherwise be ending.

The federal waiver does not impact any Refugee Cash Assistance policies other than the eligibility period. Continue to follow all other existing Refugee Cash Assistance policy.

1. What is the extended eligibility period?

The temporary extended eligibility period extends through April 30, 2021 for qualifying people.

The number of months of assistance under this extension will vary case by case, depending on when someone became initially eligible for Refugee Cash Assistance and/or re-qualifies for Refugee Cash Assistance. The extension looks back to people with Refugee Cash Assistance eligibility starting on April 1, 2019, creating a maximum 25-month window of eligibility.

Benefits start the month of application or re-application going forward to the end of the federal waiver on April 30, 2021, not to exceed 25 months.

Benefits are not retroactive to any previous Refugee Cash Assistance eligibility.

2. Who is eligible for the extension?

Anyone who became Refugee Cash Assistance eligible on or after April 1, 2019 to August 31, 2020, may benefit from the extension. This includes:

- Currently active Refugee Cash Assistance recipients who will exhaust their 8 month eligibility prior to May 1, 2021.
- Those who have exited the Refugee Cash Assistance program and are experiencing reduced hours or loss of employment, which requalifies them for Refugee Cash Assistance.

3. Who is not eligible for the extension?

Anyone who became eligible for Refugee Cash Assistance prior to April 1, 2019, is not eligible for the extension.

Anyone who became eligible for Refugee Cash Assistance on or after September 1, 2020, is not eligible for the extension.

- The eligibility period for these participants will remain at eight months, because their 8th month of eligibility would be April 2021 or later. April 2021 marks the last month of the federal waiver.
- Follow existing policy when setting the eligibility period in MAXIS.
II. MAXIS Workaround

There are no MAXIS programming changes related to this temporary policy change. The policy will be implemented through a manual process in MAXIS.

1. Active Refugee Cash Assistance Cases

   A. Individuals currently receiving Refugee Cash Assistance who will exhaust their initial 8 months of eligibility on or after May 1, 2021, are not eligible for the extended period. No actions are needed. Follow normal policy and processing guidelines.

   B. Individuals currently receiving Refugee Cash Assistance who will exhaust their 8 months of eligibility prior to February 2021, are eligible for the extended period. Do not close the Refugee Cash Assistance case at the end of the 8 month eligibility period. Take the following actions at the end of the 8 month eligibility period or when an approval is required prior to the end of the 8 month eligibility period:
      1. On STAT REVW update the Cash/GRH “Next Review” date to 05/2021.
      2. On STAT WREG:
         i. If the household is also receiving SNAP, update work registration exemptions for each unit member age 16 and older. On the FSET Work Reg Status field, use code 17 -Receiving RCA unless another exemption is a better fit. On the ABAWD Status field use code 12 – RCA.
         ii. Code GA Elig Basis = {99 – No Elig Basis}.
         iii. Code RCA Participant Status = {14 Exempt, Exper Personal or Family Crisis}.
            Note: During the COVID-19 public health emergency, participants have a good cause exemption from RCA employment requirement. Do not enter Referral Date or RES Provider Info if code 14 is used. If participant chooses to participate in RES, then code RCA status = {01 – Mandatory}, enter Referral Date, and complete the RES Provider Info following normal processing.
      3. Process Refugee Cash Assistance eligibility results like normal via FIAT to modify Refugee Cash Assistance results to extend the eligibility period:
          FRSL Panel: Select Person Budget, Person Test, View Case Tests, View Case Budget with an ‘X’
          FRPR Panel:
            • Change the membership code to ‘A’ (Eligible/All Counted)
            • Enter the Budget Cycle = R (Retrospective)
            • Change the 8 MONTH PERSON TEST result from FAILED to PASSED
          FRBA: Enter the individual’s counted income and allowed expenses per normal RCA policy.
          FRCR: Change the ELIGIBLE PERSON CASE TEST result from FAILED to PASSED
          FRCB: Review the Case Budget/Budget Summary
          FRSM: Review the Eligibility Result Summary
      4. Approve the RCA Results via RCA ELIG
      5. Add the following Worker Comment to the approval notice:
          Your eligibility for Refugee Cash Assistance (RCA) has been extended due to COVID-19. This extended eligibility period will end on April 30, 2021.
      6. Case note all actions taken.
7. Create a **TIKL** for April 2021 to close RCA for May 2021. To avoid any overpayments, RCA must be closed before 10-day cut off allowing proper 10-day closing notice.

    **Note:** for normal processing instruction, see POLI TEMP TE02.10.26 – REFUGEE CASH ASSISTANCE WORKAROUND.

    If SNAP is open, review the FS ELIG results to ensure that the RCA grant is included in the SNAP budget calculation on the FSB1 screen.

2. **Re-Qualifying Applicants**

   Individuals who became Refugee Cash Assistance eligible between April 1, 2019, and August 31, 2021, who exited Refugee Cash Assistance and requalify for Refugee Cash Assistance due to reduced income or lost employment, are eligible for the extended period. Process the application using COVID-19 Worker Guidance and Q&A, and the following instructions:

   1. Pend the cash application following normal Refugee Cash Assistance processing guidelines.
      a. Review and update any necessary STAT panels,
      b. On WREG:
         i. If the household is also receiving SNAP, update work registration exemptions for each unit member age 16 and older. On the FSET Work Reg Status field, use code 17 -Receiving RCA unless another exemption is a better fit. On the ABAWD Status field use code 12 – RCA.
         ii. Code GA Elig Basis = {99 – No Elig Basis}
         iii. Code RCA Participant Status = {14 Exempt, Exper Personal Or Family Crisis}. Note: During the COVID-19 public health emergency, participants have a good cause exemption from RCA employment requirement. Do not enter Referral Date or RES Provider Info if code 14 is used. If participant chooses to participate in RES, then code RCA status = {01 – Mandatory}, enter Referral Date, and complete the RES Provider Info following normal processing.
   2. On STAT REVW update the Cash/GRH “Next Review” date to 05/2021.
   3. The system will generate CASH DENY results. No RCA eligibility results will be given. Workers must manually create eligible RCA results via **FIAT** for the application month through the current plus one benefit month using the following directions to extend the eligibility period:
      a. Manually create RCA results by going to the FIAT submenu:
         i. Reason Code = {10: RCA, MSA, GA Only}
         ii. Select ‘RCA’ program with an ‘X’
         iii. FRSL Panel: Select Person Budget, Person Test, View Case Tests, View Case Budget with an ‘X’
         iv. FRPR Panel:
            1. Change the membership code to ‘A’ (Eligible/All Counted)
            2. Enter the Budget Cycle = P (Prospective)
            3. If case has not been closed over 30 days, Enter Budget Cycle = R (Retrospective), instead of prospective.
            4. Change the 8 MONTH PERSON TEST result from FAILED to PASSED
         v. FRBA: Enter in the individuals’ counted income and allowed expenses per normal RCA policy
vi. **FRCR**: Change the ELIGIBLE PERSON CASE TEST result from FAILED to PASSED

vii. **FRCB**: Review the Case Budget/Budget Summary

viii. **FRSM**: Review the Eligibility Result Summary

4. Approve the RCA Results via **ELIG RCA**

5. Add the following Worker Comment to the approval notice:
   
   Your eligibility for Refugee Cash Assistance (RCA) has been extended due to COVID-19. This extended eligibility period will end on April 30, 2021.

6. Case note all actions taken.

7. Create a **TIKL** for April 2021 to close RCA for May 2021. To avoid any overpayments, RCA must be closed before 10-day cut off allowing proper 10-day closing notice.

   **Note:** for normal processing instruction, see POLI TEMP TE02.10.26 – REFUGEE CASH ASSISTANCE WORKAROUND.

   If SNAP is open, review the FS ELIG results to ensure that the RCA grant is included in the SNAP budget calculation on the FSB1 screen.

3. **Recent extended and regular cases closed for February 2021**

   Extended cases through 01/31/2021 or regular cases with their 8th month in January 2021 that were closed for February 2021, may qualify for this updated extension through 04/30/2021. Eligibility workers must complete a check-in with participants if a check-in was not completed within the last 6 months to see if they are still impacted by COVID-19 and what other services they may need help with toward becoming self-sufficiency.

   - For more guidance on check-in, see [CM0030.18 – RCA 6-Months Review](#)
   - Check-in can be done in person or over the phone.
   - Reinstate these cases after you’ve completed a check-in as required, and follow MAXIS Workaround step 1B Active Refugee Cash Assistance listed above for guidance on how to extend RCA for these cases.
   - If you are unable to complete a check-in, the case will remain closed. Send out an agency notice or MAXIS MEMO to client’s last known address informing them the following:
     
     The Refugee Cash Assistance (RCA) program eligibility has been temporary extended. You may qualify for additional RCA help. You must complete a check-in with your RCA worker to determine your eligibility. Please call (RCA worker) at (contact number).
   - If participants do not wish to continue RCA, case note your actions and client’s response, and let the RCA remain closed.
   - If a case is closed over 30 days, a reapplication is required.

4. **New Applicants**

   Individuals who are new arrivals or who had their status change and became Refugee Cash Assistance eligible starting on or after September 1, 2020 are not eligible for the extended period. Process the application using current existing policy covered within the COVID-19 Worker Guidance and the COVID-19 Q&A, and normal RCA policy.
III. Questions and Answers

Q1: Who is eligible to benefit from the Refugee Cash Assistance eligibility period extension?

A1: Individuals who became Refugee Cash Assistance eligible on or after April 1, 2019 to August 31, 2020. The eligibility period extension is meant to assist people who have successfully exited the program and subsequently lost employment or sustained a reduction in hours which would requalify them for Refugee Cash Assistance, and current recipients who are about to roll off of Refugee Cash Assistance.

For example:
1. Mr. Melnik arrived as a refugee on April 1, 2019. He received Refugee Cash Assistance for 3 months (April, May, June), became employed and successfully exited Refugee Cash Assistance in July 2019. He was laid off in March 2020 due to COVID-19. Mr. Melnik is now eligible for Refugee Cash Assistance through April 30, 2021, unless he regains employment or receives other pandemic related compensation that would disqualify him.

2. Ms. Kayembe received a final grant of asylum in April 2019. She was screened for Refugee Cash Assistance in June 2019 (3rd month of eligibility) and received Refugee Cash Assistance through November 2019. Ms. Kayembe did not gain employment. Ms. Kayembe is now eligible for Refugee Cash Assistance through April 30, 2021, unless she gains employment or receives other pandemic related compensation that would disqualify her from Refugee Cash Assistance.

Q2: What does “eligibility on or after April 1, 2019” mean?

A2: This refers to the date someone became eligible for RCA benefits, not the date the person initially enrolled in the RCA program. Example: Someone who was granted asylum on March 15, 2019, would not be eligible for the extension.

Q3: Are individuals who were seeking employment when the COVID-19 situation developed, but who were not yet employed and who continue to be unable to secure employment, eligible to receive RCA beyond the 8 months?

A3: Yes. If someone became eligible for Refugee Cash Assistance on or after April 1, 2019, and has been unable to secure employment, that individual may be eligible to receive Refugee Cash Assistance through April 30, 2021.

Q4: Will people who became eligible for Refugee Cash Assistance benefits on or after September 1, 2020 be eligible for extended RCA?

A4: No. People who became eligible for Refugee Cash Assistance benefits on or after September 1, 2020, will only be eligible for the standard 8 months of RCA. The federal Office of Refugee Resettlement will continue to assess the COVID-19 situation to see whether additional extensions are needed.
Q5: Can people who formerly received Matching Grant (MG) benefits be enrolled into the Refugee Cash Assistance eligibility extension, if they meet all other eligibility criteria?

A5: Yes. If on or after April 1, 2019 through August 31, 2020, if the person was eligible for Refugee Cash Assistance, has subsequently lost employment or income, and meets the income eligibility threshold for the state, that individual can be screened for the Refugee Cash Assistance eligibility period extension and enrolled to receive Refugee Cash Assistance through April 30, 2021.

Note: Matching Grant may also have an extension. Review the situation with the Matching Grant worker to see which program will benefit the individual.

Q6: Can people receiving General Assistance be enrolled into Refugee Cash Assistance eligibility extension if they meet all extension eligibility criteria?

A6: Yes. However, General Assistance and Refugee Cash Assistance cannot both be active at the same time. Review with the General Assistance worker to see which program is more beneficial for the person.

Q7: Can someone who was never on RCA qualify for this extension, too?

A7: Yes. Individuals who became Refugee Cash Assistance eligible on or after April 1, 2019 may qualify for the temporary Refugee Cash Assistance eligibility extension through April 30, 2021.

These are two examples where people not previously on Refugee Cash Assistance may qualify for this extension.

Example 1: An 18 year old refugee adult child with an entry date of 04/05/2019 was on the Minnesota Family Investment Program and attended High School fulltime. He turned 19 in June 2019 and is not continuing with school. He is eligible for Refugee Cash Assistance July 2019 and is eligible to be reviewed for the Refugee Cash Assistance extended policy from date of application through April 30, 2021.

Example 2: A woman seeking asylum was granted asylee status on April 20, 2019, but was never on Refugee Cash Assistance because she was working and did not need the assistance. Now, during the COVID-19 health emergency, she lost her job. She is eligible to be reviewed for the Refugee Cash Assistance extended policy from the date of application through April 30, 2021.

Americans with Disabilities Act (ADA) Advisory

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