

**Division of Aging & Adult Services**  
**Arizona Refugee Resettlement Program**  
**Policy & Procedures**



**Subject:** Arizona Refugee Resettlement Program (RRP)  
Refugee Cash Assistance Public/Private Partnership Program  
**Process Owner:** Division of Aging and Adult Services - RRP  
**Effective Date:** 1/1/2024  
**Revision Number:** 0

**Refugee Cash Assistance - Public/Private Partnership Program**

**I. POLICY STATEMENT**

The Arizona Refugee Resettlement Program (RRP) implements a Public/Private Partnership (PPP) model for administering Refugee Cash Assistance (RCA) benefits and corresponding Temporary Assistance for Needy Families (TANF) Differential Payments through local PPP Contracted Providers, funded by the United States (U.S.) Department of Health and Human Services (HHS), Administration for Children and Families, Office of Refugee Resettlement (ORR).

This document outlines PPP policy and procedure and is subject to change as additional information, guidance and/or requirements are received from the ORR.

**II. APPLICABILITY**

This policy applies to:

- A. PPP Contracted Providers;
- B. DES employees of RRP;
- C. DES employees, contractors, subcontractors and employees of contractors and subcontractors, whose work assists RRP.

**III. AUTHORITY**

[Immigration and Nationality Act \(INA\) \(2022\)](#)

Pub.L. 117 - 103, Title IV - Miscellaneous and Refugee Assistance - Chapter 2: Refugee Assistance

[Refugee Act of 1980](#)

Pub.L. 96-212 (1980)

[45 CFR 75.341 - 75.342](#)

Remedies for Noncompliance

[45 CFR 400](#)

Refugee Resettlement Program

Subpart A - Introduction

Subpart E - Refugee Cash Assistance

Subpart F - Requirements for Employability Services and Employment

[U.S. Citizenship and Immigration Services](#)

United States Refugee Admissions Program (USRAP) Consultation and Worldwide Processing Priorities

[Office of Refugee Resettlement \(ORR\) Policy Letter](#)

PL 23-04 - Expanding Income Disregards for Refugee Cash Assistance, June 12, 2023

[ORR Policy Letter](#)

PL 21- 04 - Guidance for Public/Private Refugee Cash Assistance Programs, April 19, 2021

[ORR Dear Colleague Letter](#)

DCL 22-01 - Increase in Public/Private Partnership (PPP) Refugee Cash Assistance (RCA) Monthly Payment Ceilings, October 01, 2021

[Arizona State Plan for Refugee Resettlement](#)

**IV. DEFINITIONS**

Arizona Refugee Resettlement Program Online Data System (ARRPODS): RRP's data management system.

Arizona Resident: An individual who is in Arizona and intends to establish Arizona as their permanent home. An individual can be temporarily absent from Arizona for up to 30 days and still remain an Arizona Resident. Arizona Residency is *not* established when an individual is vacationing in or visiting Arizona, or for out-of-state students attending a school in Arizona.

Appeal: A request by an Applicant or Client for a formal review of an adverse action or delay in processing an application .

Applicant: An individual applying for Refugee Cash Assistance or the PPP TANF Differential Payment.

Client: An individual receiving Refugee Cash Assistance or PPP TANF Differential Payments.

Day: Means a calendar day unless otherwise specified. The date of the act, event, or default from which the designated period of time begins is not included. The last Day of the period is counted, unless it is a Saturday, a Sunday, or a federal or state holiday, in which event the period runs until the end of the next Day which is not a Saturday, a Sunday, or a federal or state holiday.

Division of Benefits and Medical Eligibility (DBME): A Division within the Department of Economic Security that administers the majority of DES' primary public assistance programs.

Dual Enrolled/Dual Enrollment: A Client who is receiving both RCA and TANF benefits.

Economic Self-Sufficiency: Earning a total family income at a level that enables a family unit to support itself without receipt of public cash assistance. Clients receiving Supplemental Nutrition Assistance Program (SNAP), Medicaid, and other public assistance without public cash assistance are considered self-sufficient.

Eligible Entrant/Beneficiary: Individuals with immigration statuses that qualify them for ORR funded services and benefits.

Employment Authorization Document (EAD): A document (Form I-766), issued by the United States Citizenship and Immigration Services that provides temporary employment authorization to noncitizens in the United States.

Employability Plan (EP): A document that is unique to each Client enrolled in employment services within ARRPODS. The EP must include provisions for employment services and tasks that will assist Clients to secure employment.

Executive Office for Immigration Review (EOIR): A sub-agency of the United States

Department of Justice whose chief function is to conduct removal proceedings in immigration courts and adjudicate appeals arising from the proceedings.

Fraud/Fraudulent Activity: Knowingly and willfully executing, or attempting to execute, a scheme or ploy to defraud the PPP program by providing information by means of false pretenses, deception, or misrepresentation in order to receive undue payment from the PPP cash assistance benefit program.

Family Assistance Administration (FAA): Administration within DES/DBME responsible for the administration of the Nutrition Assistance or the Supplemental Nutrition Assistance Program (NA/SNAP), Cash Assistance/Temporary Assistance for Needy Families (CA/TANF), and/or Medicaid (Arizona Health Care Cost Containment System [AHCCCS]) programs.

Household: An individual adult, married individuals without children, parents, or custodial relatives with minor children who are not eligible for TANF, who live at the same residence.

Incapacitated Individual: Determined by a physician or licensed or certified psychologist and verified by a caseworker that a physical or mental impairment, by itself or in conjunction with age, prevents the individual from engaging in employment search activities.

Job Corps: A United States Department of Labor program that assists young adults (ages 16-24) with completing their high school education and provides vocational training.

Lesser Diffusion: A language in an Arizona city, county, or region where the population of speakers is relatively small and for which RRP might not have translated documents.

Net Negative Income: Income that is less than the amount needed to cover the basic expenses needed for the maintenance of a Household.

Office of Refugee Resettlement (ORR): A program within the Administration for Children and Families (ACF) within the United States Department of Health and Human Services. ORR funds critical resettlement services and benefits to assist eligible beneficiaries with becoming self-sufficient as quickly as possible after their arrival or grant of authorizing status in the United States and maximizing their potential to become integrated members of American society.

ORR Grant of Qualifying Status: Statuses and documents which confirm eligibility for Refugee Resettlement Program benefits, as outlined in [HHS guidance](#).

Public/Private Partnership (PPP): A Refugee Cash Assistance framework that supports participating states partnering with Contracted Providers to administer Refugee Cash Assistance and the PPP TANF Differential Payment.

PPP Contracted Provider: Local non-profit agencies contracted through the Arizona Refugee Resettlement Program that are responsible for administering the PPP cash assistance benefit program.

PPP TANF Differential Payment: A 12-month maximum, supplemental payment provided through the PPP cash assistance benefit program for ORR eligible beneficiaries receiving Arizona TANF that matches the federal TANF payment limit, which is higher than the State of Arizona limit.

Private Resettlement: A U.S. admissions program for newly arriving Refugees or other federal resettlement sponsorship program for eligible beneficiaries. This resettlement occurs for Refugees and eligible beneficiaries who elect to be resettled through a Private Sponsorship Group (PSG) or a U.S. Tie apart from the traditional Reception and Placement Program, whereby a Local Resettlement Agency (LRA) sponsors and resettles Refugees and other Eligible Entrants.

Reception and Placement (R&P) Program: U.S. Refugee Admissions Program resettlement assistance for newly arriving Refugees and other Eligible Entrants in the U.S. All Refugees and Eligible Entrants, approved for admission to the U.S., are sponsored by one of ten non-profit national resettlement agencies participating in the R&P Program under a cooperative agreement with the U.S Department of State that matches the particular needs of each incoming Refugee with LRA sponsors and the specific resources available in U.S. communities (e.g., availability of affordable and safe housing, school capacity, medical care, and employment opportunities).

Reconciliation Meeting: A meeting held by the sponsoring PPP Contracted Provider to investigate the reasons for a Client's non-compliance with program requirements.

Refugee: Any person who is outside the country of such person's nationality, or in the case of a person having no nationality, is outside the country in which such person last habitually resided, and who is unable or unwilling to return to, and is unable or unwilling to avail himself or herself of the protection of that country because of persecution or a well-founded fear of persecution for reasons of race, religion, nationality, membership of a particular social group, or political opinion.

Refugee Cash Assistance (RCA): A 12-month maximum, needs-based cash assistance benefit for Refugees and other Eligible Beneficiaries who are otherwise ineligible for other public cash assistance programs.

Refugee Resettlement Program (RRP): Arizona's program to assist eligible Refugees, Asylees, Cuban and Haitian Entrants, Iraqi and Afghan Special Immigrant Visa (SIV) Holders, Certain Amerasians, Certain Minors with Special Immigrant Juvenile Status (SIJS), Unaccompanied Minors with U status, Foreign-born Victims of Severe Forms of Human Trafficking, Afghan Humanitarian Parolees, and Ukrainian Humanitarian Parolees with effective resettlement and achieving Economic Self-Sufficiency as quickly as possible after their arrival or grant of authorizing status in the United States.

Resources: A Client's total financial assets including savings, equity, property and dividends.

Sanctioning: Actions that pertain to reduction, suspension or termination of RCA or the PPP TANF Differential Payment.

Sponsor: An individual, church, civic organization, state or local government, public and private non-profit agencies or other group or organization that has agreed to help with the reception and initial placement of Refugees or other Eligible Entrants in the United States.

Temporary Assistance for Needy Families (TANF): Federally-funded grant program that provides cash benefits and supportive services to Arizona families. TANF benefits are used to help families meet their basic needs, including shelter, clothing, and utility costs. Supportive services assist families in maintaining self-sufficiency by providing child care assistance, an employment program, and child support services, allowing families to care for children in their own homes and helping meet their basic needs.

Temporary Assistance for Needy Families (TANF) Refugee Program: Provides customized, culturally and linguistically appropriate services to assist eligible Refugees navigate barriers, become economically independent and improve their social and economic well-being.HHS

Unsubsidized Employment: Employment in the public or private sector that is not subsidized by TANF or any other public program.

## **V. STANDARDS**

### **A. Overview**

1. RRP is funded by the Office of Refugee Resettlement (ORR), under the Administration for Children and Families within the United States Department of Health and Human Services (HHS).
2. RRP oversees the Public/Private Partnership (PPP) Program that is responsible for administering Refugee Cash Assistance (RCA) and PPP TANF Differential

Payments to support those with qualifying immigration statuses to attain Economic Self-Sufficiency as quickly as possible after U.S arrival or grant of authorizing status.

- a. RCA and PPP TANF Differential Payments are administered through a PPP RCA model pursuant to CFR 45 §400.58.
  - b. RCA is a time-limited, needs-based cash assistance benefit for Refugee and other Eligible Beneficiary Households that are otherwise ineligible for other public cash assistance programs.
    - i. RCA benefits are provided for a maximum of 12 months from the date of the Applicant's ORR eligibility.
  - c. PPP TANF Differential Payments are supplemental payments provided to Clients who are eligible for TANF Cash Assistance and receive less than the federal maximum TANF benefit payment rate.
    - i. PPP TANF Differential Payments support ORR Eligible Beneficiaries with receiving TANF cash assistance in parity with those for RCA recipients under the PPP cash assistance benefit Program.
    - ii. PPP TANF Differential Payments are provided for a maximum of 12 months from the date of the Applicant's date of ORR Grant of Qualifying Status.
3. RRP's PPP cash assistance benefit program and its contracted public and private partners operate the program in accordance with federal regulations and policy guidelines.
  4. Only an Arizona PPP Contracted Provider with authorization from ORR may enroll Eligible Beneficiaries in the PPP cash assistance benefit program. (Refer to [Appendix 1](#) for a list of PPP Contracted Providers).
  5. RRP contracts with the International Rescue Committee (IRC) - Phoenix to provide oversight and distribution of RCA and PPP TANF Differential Payment benefits and debit cards.
  6. RRP utilizes IRC's banking subcontractor as the fiduciary agency for the PPP Program.

## **B. Eligibility Requirements for RCA and PPP TANF Differential Payments**

1. Non-Financial Eligibility Requirements
  - a. An Applicant for RCA must not be eligible for any of the following cash assistance programs:
    - i. Temporary Assistance for Needy Families (TANF);

- A. RCA Applicants must apply for TANF if the Applicant has dependent children.
- B. If an RCA Applicant was denied TANF Cash Assistance, the denial must have been for the following reasons to be eligible for RCA:
  - 1. Applicant was found ineligible through no fault of their own; and
  - 2. The Applicant is not able to reapply for TANF within their 12 month PPP TANF Differential Payment program eligibility time frame.
- ii. Supplemental Security Income (SSI);
- iii. Old Age Assistance (OAA);
- iv. Aid to the Blind (AB);
- v. Aid to the Permanently and Totally Disabled (APTD);
- vi. Aid to the Aged, Blind and Disabled (AABD); or
- vii. The Matching Grant Program (MGP).
- b. An Applicant for PPP TANF Differential Payments must be receiving TANF Cash Assistance payments.
- c. An Applicant must have one of the qualifying immigration statuses listed in [HHS guidance](#).
  - i. In the event that members of a Household have mixed immigration statuses, PPP Contracted Provider caseworkers must assist the Household with applying for programs that most benefit the Household.
- d. An Applicant must intend to be an Arizona Resident.
- e. All Household members are required to actively seek work and must develop an Employability Plan (EP) with their PPP Contracted Provider case manager upon enrollment.
  - i. The following individuals are exempt from the work requirement:
    - A. An Incapacitated Individual.
    - B. A woman in the final three months of pregnancy and for 12 consecutive weeks after delivery.



- C. A parent or caretaker of a child when the Household is denied DES Child Care or other programs or is placed on a waitlist for childcare. This exemption applies to only one adult per Household.
- D. A caretaker of a totally dependent person due to medical or mental health issues if a medical or mental health provider has indicated that this person requires full-time care. This exemption applies to only one adult per Household.
- E. An individual who is working at least 30 hours per week in Unsubsidized Employment, but is not earning sufficient compensation to pay for all expenses. Unsubsidized Employment must be expected to continue for at least 30 Days. This exemption continues to apply if there is a temporary break in full-time employment. The break cannot exceed 10 work Days.
- F. An individual who is either under age 16, or under age 18 and a full-time student.
- G. An individual participating in the Job Corps.
- H. An individual who is at least 65 years of age and not receiving any Social Security benefits.
- I. A survivor of domestic violence for whom working or participation in employment search activities would put them at further risk of harm.
- J. Cuban and Haitian Entrants without work authorization until such time as they obtain the legal right to work pursuant to [Policy Letter 19-06](#).
- K. Any Eligible Beneficiary who requires an Employment Authorization Document (EAD) in order to gain employment, has applied, and is waiting to receive the EAD.

## 2. Financial Requirements

- a. An Applicant for RCA must have a Net Negative Income.
  - i. When determining the Household's Net Negative Income, the following expenses paid by the Applicant or the Applicant's Sponsor are deducted from the Household's total Income:
    - A. Housing costs;
    - B. Food costs not covered by SNAP;

- C. Utility costs;
  - D. Basic transportation costs;
  - E. Communication technology costs;
  - F. Laundry and necessary Household supplies;
  - G. Medical costs not covered by the state's medicaid programs and pursuant to physician/psychiatrist care directives; and
  - H. Documented childcare costs exceeding the rates provided by the State.
- ii. When determining the Household's Net Negative Income, include:
- A. The income of the Applicant; and
  - B. The income of any member of the Applicant's Household.
  - C. The Sponsor's income, if applicable, is not considered in determining income eligibility.
  - D. Cash grants for Refugees provided by the Reception and Placement Program (R&P), Welcome Corps, Afghan Placement and Assistance program (APA), or other private sponsorship programs are not considered in determining income eligibility.
  - E. Any income source remaining in the Applicant's country of origin is not considered in determining income eligibility, if the Applicant does not have access to the income.
  - F. When a Household's income exceeds their monthly expenses, they are no longer eligible.
- b. Resources that a Household has access to must be less than the amount needed to pay a Household's expenses. To determine if Resources exceed expenses:
- i. Resources are calculated to include:
    - A. Cash in Hand;
    - B. Bank Accounts;
    - C. Promissory Notes;
    - D. Government Bonds;
    - E. Stocks;

- F. Certificates of Deposit (CDs); or
  - G. Any other Resources accessible to the Household.
- ii. Resources do not include:
- A. A Sponsor's Resources; or
  - B. Any Resources remaining in the Applicant's country of origin are not considered in determining resource eligibility, if the Applicant does not have access to the resource.
- iii. Expenses are calculated based on the Household's monthly expenses multiplied by the average amount of time it takes a Client to obtain employment from their Arizona entry date (as determined by RRP), or by six months for instances when the Arizona entry date to entering employment timeline surpasses six months.

## **C. Application Process**

### **1. Application Submission**

- a. An Applicant may apply for RCA or PPP TANF Differential Payments by visiting a local PPP Contracted Provider office.
- b. An Applicant has 30 Days from the date that the PPP Applicant Acknowledgement Form is signed to provide all required documents and sign all required forms. If an Applicant does not complete the application process within 30 Days, the application will be denied and the Applicant must reapply.
- c. An Applicant must submit documentation that demonstrates:
  - i. The Applicant and Household are not eligible for any of the following cash assistance programs when they have screened as potentially eligible by the PPP Contracted Provider (RCA requirement):
    - A. TANF;
    - B. SSI;
    - C. OAA;
    - D. AB;
    - E. APTD;
    - F. AABD; or
    - G. MGP.

- ii. The last 30 Days of Household income. Acceptable documentation may include:
  - A. Pay stubs;
  - B. Bank statements;
  - C. PPP Income Attestation Form; or
  - D. Any other income documents.
- iii. The last 30 Days of available Resources. Acceptable documentation may include:
  - A. Bank statements; or
  - B. Any other available resource documents.
- iv. The last 30 Days of Household expenses, if Household income has been reported. Acceptable documentation may include:
  - A. A copy of a rental agreement/lease;
  - B. Utility bills;
  - C. Receipts showing transportation costs;
  - D. Receipts showing communication technology costs, such as cell phone bills and internet service bills;
  - E. Receipts showing the purchase of laundry and other necessary Household supplies;
  - F. Medical bills showing that medical expenses were not covered by State Medicaid and pursuant to physician/psychiatrist care directives;
  - G. Documented childcare costs;
  - H. Written Sponsor statement stating that the claimed expenses are being paid by the Sponsor; or
  - I. Any other documentation that demonstrates Household expenses.
- v. Immigration status. Acceptable documentation may include:
  - A. I-94 Arrival/Departure Record;
  - B. Immigration judge's order;
  - C. Refugee Travel Document; or

- D. Any other document as listed in [HHS guidance](#).
- vi. Sponsorship, if applicable. Acceptable documentation may include:
  - A. I-864 Affidavit of Support;
  - B. I-134 Declaration of Financial Support; or
  - C. Written statement from the Sponsor.
- vii. If the Applicant is exempt from the work requirement as outlined in V(B)(1)(e)(i), documentation must be provided to support the exemption and may include:
  - A. A written statement signed by a physician or licensed or certified psychologist that the Applicant has a physical or mental impairment.
  - B. A written statement signed by a physician or licensed or certified psychologist that the Applicant is the caretaker of a person with a physical or mental impairment and requires full time care.
  - C. A written statement signed by a physician that the Applicant is in the last trimester of their pregnancy.
  - D. A Birth Certificate that provides a date of birth (from which an age can be determined).
  - E. Any other documentation that can demonstrate the applicable exemption reason.
- d. An Applicant must verbally attest to their Household's intention to remain in Arizona.
- e. An application must include:
  - i. A completed PPP Applicant Acknowledgement form.
  - ii. A completed Affidavit of Household Size form.
  - iii. A completed Benefits and Responsibilities form.
  - iv. A completed PPP Income Attestation Form (RCA applications).

## 2. Application Recertification

- a. Clients receiving a PPP TANF Differential Payment will complete their TANF recertification with the Division of Benefits and Medical Eligibility (DBME) every six months.

- b. Clients receiving RCA must recertify their benefits every 30 Days.
  - i. Changes in Household address, expenses, income, resources, immigration status and employment must be reviewed as part of a recertification.
    - A. Changes to the Household size will result in the case being closed and a new case opened.
    - B. Clients will need to sign a new application and new documentation.
  - ii. Clients are required to provide the following documents when recertifying:
    - A. Income documents from the last 30 Days (if applicable);
    - B. Resource documents from the last 30 Days (if applicable);
    - C. Updated immigration documents for Clients granted a Cuban/Haitian Entrant status or other immigration status for nationals of Cuba or Haiti;
    - D. Updated documents that demonstrates Household expenses from the last 30 Days (if the Household has income); or
    - E. Updated Affidavit of Household Size form (if applicable).
  - iii. Clients are required to be in contact with their PPP caseworker and inform caseworkers of any changes to their contact information.
    - A. If a caseworker does not have contact with the Client for 60 Days, the case will be closed and benefits will be terminated.

#### **D. Enrollment**

- 1. The date of PPP enrollment is determined by the:
  - a. Date an Applicant signs a completed PPP Applicant Acknowledgement Form (RCA);
  - b. Date a Client is enrolled in TANF Cash Assistance (PPP TANF Differential Payments);
    - i. If a Client is already receiving TANF Cash Assistance benefits, PPP caseworkers may backdate the PPP TANF Differential Payments from the date they enrolled into TANF, but not before their ORR eligibility date.

- ii. RRP will enroll the Client when the payments must be backdated more than two months.
  - c. Date Client was denied regular TANF Cash Assistance benefits due to no fault of their own, including denial for income or Household composition. The caseworker will use the date on the TANF denial notice as the RCA enrollment date.
- 2. RCA payments are available for a maximum of 12 months from the month of the Applicant's ORR eligibility.
  - 3. PPP TANF Differential Payments are available for a maximum of 12 months from the month of the Applicant's ORR eligibility.

## **E. Roles and Responsibilities**

- 1. The Department of Economic Security (DES) will:
  - a. Provide Family Assistance Administration (FAA)/DBME staff who will process benefit applications and perform required job search activities for Refugees and other Eligible Beneficiaries enrolled in TANF/TPEP. Staff will receive specialized training focused on TANF Refugee Program policies and eligibility requirements.
  - b. Provide access to information needed for TANF Clients enrolled in the PPP TANF Differential Program, through a Data Sharing Agreement (DSA).
- 2. RRP will:
  - a. Provide necessary access to shared database systems and IT support for PPP Contracted Provider use.
  - b. Develop and maintain:
    - i. PPP Policies and Procedures; and
    - ii. PPP Use Case Scenarios Manual.
  - c. Monitor determinations made by PPP Contracted Providers for program eligibility by:
    - i. Monitoring Client immigration status and confirming eligibility for PPP program services by:
      - A. Reviewing documentation entered into the Arizona Refugee Resettlement Program Online Data System (ARRPODS) by PPP Contracted Providers.
    - ii. Reviewing monthly DBME reports to:

- A. Ensure Clients are not Dual Enrolled (receiving TANF Cash Assistance and RCA);
  - B. Verify Client TANF enrollment and payment amounts; and
  - C. Determine PPP TANF Differential Payment amounts.
- d. Determine whether an Applicant is eligible for RCA enrollment, when an Applicant is denied or determined ineligible for TANF as outlined in V(B)(1)(a)(i)(B) of this policy.
  - i. After the PPP Contracted Provider has submitted the Client's TANF denial/eligibility documents and has acquired and uploaded the Client's RCA application documents, RRP will complete the RCA enrollment for the Client in ARRPODS.
- e. Make determinations regarding Dual Enrolled Clients as to:
  - i. Eligibility for RCA; or
    - A. When RRP determines that there are circumstances for which the Dual Enrolled Client is eligible for RCA rather than TANF, RRP will:
      - 1. End the PPP TANF Differential Payment to coincide with the date TANF was terminated;
      - 2. Enroll the Client in RCA; and
      - 3. Notify the FAA Refugee Unit.
  - ii. Eligibility for TANF
    - A. When RRP determines that the Dual Enrolled Client is eligible for TANF rather than RCA, the PPP Contracted Provider will:
      - 1. Terminate the RCA enrollment;
      - 2. Enroll the Client in TANF; and
      - 3. Provide applicable information to the FAA Refugee Unit.
- f. Enroll Clients when the Client's PPP TANF Differential Payment must be backdated more than two months.
- g. Weekly, monitor the PPP Contracted Providers' contract compliance, by:
  - i. Providing technical assistance to each PPP Contracted Provider; and



- ii. Creating approvals and payment authorizations to IRC in ARRPODS, when applicable.
- h. Initiate contractual remediation actions with the PPP Contracted Provider, when applicable.
- i. Assess and determine appropriate actions for overpayments as outlined in V(H)(2)(a) and V(H)(2)(b) of this policy.
- j. Issue underpayments, when applicable, for any missed payments as outlined in V(H)(1) of this policy, and complete the following:
  - i. Issue the payment due to the Client, even if the payment is identified after the PPP TANF Differential Payment benefit is closed.
- k. Update and translate RCA/PPP TANF Differential Payment benefit-related forms, including:
  - i. Application forms;
  - ii. Recertification documents; and
  - iii. Any other documents related to or required for the RCA PPP program.
- l. Review the following documentation in ARRPODS, as needed, to ensure accuracy:
  - i. Employability Plans;
  - ii. Monthly tasks and subtasks;
  - iii. Current address
  - iv. Household size; and
  - v. Changes in budget and/or income.
- m. Notify:
  - i. IRC regarding:
    - A. Discrepancies related to a Client accounts overpayment or underpayment and/or possible Fraud/Fraudulent Activity;
    - B. RCA and PPP TANF Differential Payments debit cards that have not been claimed by the Client and the balance to be removed from the debit card;

- C. Verification about whether the Client's RCA and PPP TANF Differential Payments debit card has been distributed or redistributed;
      - D. Whether a Client is entitled to underpayment recovery; and
      - E. Any other notifications as deemed appropriate by RRP.
    - ii. PPP Contracted Providers and/or caseworkers regarding:
      - A. RRP updates to RCA program documents; and
      - B. Any other notifications as deemed appropriate by RRP.
    - iii. Clients regarding:
      - A. Changes to their RCA or PPP TANF Differential Payment benefit payments.
      - B. Underpayments;
        - 1. RRP will provide a notice to the Client explaining the reason for the underpayment and the amount owed to the Client.
      - C. Overpayments;
        - 1. RRP will issue an overpayment notice to the Client that includes the amount Client must repay to the RRP.
      - D. Termination notices in cases of non-compliance with PPP Contracted Provider verbal and/or written warnings.
  - n. Close cases when Clients are non-compliant with requirements of the program.
  - o. Respond to requests and notifications from PPP Contracted Providers, as outlined in V(E)(3)(u) of this policy.
  - p. Safeguard Client information; and
    - i. Comply with confidentiality measures outlined in section V(K) of this policy.
  - q. Comply with ORR reporting requirements.
3. PPP Contracted Providers will:
  - a. Safeguard Client information as outlined in section V(K) of this policy.

- b. Attend or complete all training deemed appropriate by RRP;
- c. Provide application assistance to Applicants;
- d. Determine eligibility for RCA and PPP TANF Differential Payment benefits based on RRP PPP Policies and Procedures;
- e. Work with the Clients and/or private Sponsors to obtain required documentation;
- f. Verify TANF enrollment through DBME determinations as reflected on TANF Cash Assistance (CA) Notice of Benefits; and
  - i. Enroll Applicants into PPP TANF Differential Payments per ORR eligibility and Household size.
- g. Monitor Client immigration status and confirm eligibility for PPP program services by:
  - i. Reviewing documentation entered into ARRPODS;
  - ii. Gathering information from the Applicant/Client; and
  - iii. Checking the Executive Office for Immigration Review (EOIR) database to ensure no orders of removal are present/active.
- h. Assist Applicants with applying for other programs that are more beneficial, as applicable;
  - i. If Applicants are ineligible for TANF as outlined in section (V)(B)(1)(a)(i)(B) of this policy:
    - A. PPP Contracted Providers will notify RRP staff of the denial or ineligibility. RRP staff will make a determination about whether the Applicant may enroll in RCA.
      - 1. When RRP determines that an Applicant is eligible for RCA, PPP Contracted Providers will:
        - a. Terminate the Client's enrollment in PPP TANF Differential Payment benefits;
        - b. Acquire and upload RCA application documents for the Client; and
        - c. Submit the TANF cash assistance denial/ineligibility documentation to RRP.
    - B. RRP will review, approve and complete the Client's enrollment in ARRPODS.

- i. Enroll Applicants for appropriate PPP cash assistance benefits in ARRPODS, in a timely manner (30 Days from the date of application for benefits);
  - i. For Applicants resettled either through Private Resettlement and/or remote placement (placement outside the PPP Contracted Provider's approved 100 mile service delivery radius) and who want to enroll in RCA or the PPP TANF Differential Payment program, the PPP Contracted Provider must:
    - A. Verify that the PPP Contracted Provider has capacity to assist with the enrollment and case management process.
    - B. When a PPP Contracted Provider is unable to assist due to capacity limitations, the PPP Contracted Provider must:
      - 1. Contact other PPP Contracted Providers within the service area to determine whether one can assist; and
      - 2. Notify RRP when other PPP Contracted Providers within the service area are contacted about an inability to assist in Client enrollment due to capacity limitations.
- j. Ensure that Clients receive benefits only during the time period for which they are eligible and, as such:
  - i. Perform quality assurance, data entry, and reporting tasks related to the provision of the PPP TANF Differential Payment benefits.
- k. Complete monthly recertifications by directly contacting Clients to verify that they remain eligible;
- l. Close cases and create a new case if there are changes to the Household or program status such as:
  - i. New family members added or removed.
  - ii. Switching from RCA benefits to PPP TANF Differential Payment benefits.
  - iii. Client non-compliance with PPP TANF Differential benefit program requirements, as outlined in V(E)(2)(n) of this policy.
    - A. Notification will be sent to RRP to close the case.
- m. Provide language appropriate support to Applicants/Clients by:

- i. Providing RRP translated program documents, forms, and other required informational material in the languages of the primary arrival groups;
    - A. For Applicants/Clients whose primary language is a language of Lesser Diffusion, the PPP Contracted Provider will use either:
      - 1. Staff available to provide interpretation of the documents to the Client; or
      - 2. Contracted language interpreter services to read the document to the Applicant/Client in-person or by telephone, when there is no staff able to provide language interpretation.
  - ii. Verifying that the Applicant/Client has demonstrated an understanding of:
    - A. Material presented to them; and
    - B. Where the Applicant/Client's signature is required for the document/form.
  - iii. Providing required documentation to RRP certifying that to the best of the PPP Contracted Provider's knowledge, the information was provided to the Applicant/Client in a linguistically compatible manner.
- n. Exchange PPP TANF Differential Payment Applicant/Client service data with RRP.
- o. Receive RCA and PPP TANF Differential Payments debit cards from IRC at the PPP Contracted Provider's office to distribute to Clients.
  - i. PPP Contracted Providers in Maricopa County may pick up the debit cards from IRC.
  - ii. PPP Contracted Providers in Pima County may pick up the debit cards from IRC-Tucson.
- p. Distribute RCA and PPP TANF Differential Payments debit cards including:
  - i. When a Client has moved out-of-state and did not receive their RCA and PPP TANF Differential Payments debit card from the PPP Contracted Provider and there is an outstanding balance on the card.

- A. The PPP Contracted Provider will make attempts to send the card to the Client if they are in contact with the PPP caseworker.
- q. Ensure the timely and accurate entry of information into applicable ARRPODS fields, including:
  - i. Electronic image/scans of the following documents:
    - A. Required immigration documentation, pursuant to [HHS guidance](#); and
    - B. Required enrollment documentation.
- r. Distribute RRP-updated program documents upon notification by RRP as outlined in V(E)(2)(k) of this policy.
- s. Confirm receipt of payment for all active RCA and PPP TANF Differential Payment cases on a monthly basis.
- t. Issue the following to Clients who are not in compliance with program requirements:
  - i. Verbal warnings:
    - A. The PPP Contracted Provider will issue a verbal warning to a Client who has been non-compliant with the requirements of the PPP TANF Differential Payment program for 30 Days.
      - 1. After the first 30 Days of non-compliance the Client will be given 30 Days to become compliant, following which:
        - a. At the time of 60 Days of Client non-compliance, RRP will close the case.
  - ii. Notification of:
    - A. Reconciliation Meetings; and
    - B. Sanctioning.
- u. Notify RRP (via email, telephone and/or weekly virtual consultations) of issues pertinent to Clients or program implementation, including the following:
  - i. The PPP Contracted Provider is unable to enroll the Client in or backdate payments for the PPP program due to contractor error. For such circumstances:

- A. RRP will initiate contractual remediation practices with the PPP Contracted Provider; and
  - B. The PPP Contracted Provider must provide written documentation to RRP outlining how the agency will mitigate errors moving forward.
- ii. Any translation needed for program documents, forms, and other required informational material.
- iii. Any payment discrepancies, including underpayments or overpayments, and
  - A. Why the overpayments or underpayments occurred; and
  - B. PPP Contracted Provider actions taken in response to the identification of payment discrepancies.
- iv. Identification that a Client who applied for TANF is denied or ineligible, and is unable to reapply for TANF within their PPP TANF Differential Payment eligibility time frame.
- v. Identification that a Client is enrolled in both RCA and TANF (Dual Enrolled) and information as to why the Client was Dual Enrolled. RRP will determine whether the Client is eligible for TANF or RCA.
  - A. When RRP makes a determination that there are circumstances that qualify the Dual Enrolled Client for TANF and not RCA, the PPP Contracted Provider caseworker will:
    - a. Verify whether there are any outstanding underpayments or overpayments for the Client's RCA account.
    - b. Terminate the Client's RCA enrollment;
    - c. Enroll the Client in PPP TANF Differential Payment benefits; and
      - a. The Client must sign new enrollment documentation.
  - B. When RRP determines that there are circumstances that qualify the Dual Enrolled Client for RCA and not TANF:
    - 1. RRP will end the PPP TANF Differential Payment benefit;
    - 2. Enroll the Client in RCA; and

3. Notify the FAA Refugee Unit, as outlined in V(E)(2)(e)(i)(A) of this policy.
- vi. When a TANF beneficiary requires a PPP TANF Differential Payment backdate of more than 2 months.
- vii. Identification of suspected Fraud/Fraudulent Activity.
- viii. The Case has an order of removal.
- ix. The Client is no longer eligible for services and the reason for ineligibility.
- x. When a PPP Contracted Provider contacts other PPP Contracted Providers within the service area about an inability, due to capacity limitations, to assist a Client who meets the following criteria and wants to enroll in RCA or the PPP TANF Differential Payment benefit program:
  - A. Private Resettlement;
  - B. Resettled without a designated PPP Contracted Provider; or
  - C. Resettled outside of a PPP Contracted Provider's service area (placement is outside of the PPP Contracted Provider's approved 100-mile radius) and/or Remote Placements.
- xi. When a Client has moved out-of-state and did not receive their RCA and PPP TANF Differential Payments debit card from the PPP Contracted Provider and there is an outstanding balance on the card.
- xii. When a Client has moved out-of-state, did not notify the PPP Contracted Provider or the FAA Refugee Unit, and the Client has access to the RCA and PPP TANF Differential Payments debit card.
- xiii. The PPP Contracted Provider is unable to make contact with the Client regarding reclaiming their RCA and PPP TANF Differential Payments debit card.
- xiv. Any unmet translation needs for Clients.
- xv. Any other unmet needs, concerns, or issues requiring RRP staff guidance and/or involvement.



- v. Comply with the RRP contract, scope of work, policy, and any other guidance provided by RRP.
- w. When a caseworker is uncertain whether a document verifies the Client's eligibility, the caseworker should first contact RRP to assist with making the determination about the document. If RRP is unable to assist in making the determination, the caseworker will submit the documentation to the ORR Policy Unit Eligibility inbox for review at [RefugeeEligibility@acf.hhs.gov](mailto:RefugeeEligibility@acf.hhs.gov)

**F. Payment Levels**

- 1. PPP TANF Differential Payment amounts are calculated by subtracting the difference between the Client's regular Arizona TANF payments and the ORR PPP RCA maximum payment amount.
- 2. The monthly maximum for RCA payments are as follows:

Household Unit Size	Monthly Maximum
1	\$537
2	\$726
3	\$915
4	\$1,104
Add \$113 per family member after four	

**G. Authorization of Benefits**

- 1. Payments
  - a. PPP Contracted Providers will issue the RCA or PPP TANF Differential Payment to the Client by providing them with a RCA and PPP TANF Differential Payments debit card. The debit card will be credited monthly with the Client's benefits.
    - i. Prior to the PPP Contracted Provider providing the Client with the RCA and PPP TANF Differential Payments debit card,
    - ii. IRC's banking partner will:
      - A. Provide the debit cards to IRC for distribution by PPP Contracted Providers to Clients receiving RCA/PPP TANF Differential Payments; and

- B. Create and issue the cash payments (place the payment balance) onto the RCA and PPP TANF Differential Payments debit card.
  - iii. IRC will distribute the RCA and PPP TANF Differential Payment debit cards to the PPP Contracted Providers for the Clients enrolled in the PPP program.
2. Payment Dates
- a. PPP TANF Differential Payments will be issued to Clients one month after FAA makes its regular TANF payment to the shared Client.
  - b. RCA payments will be issued at the beginning of the month following approval.

## H. Incorrect Payments

1. Underpayments
- a. Underpayments may occur if any of the following occurs:
    - i. The PPP Contracted Provider incorrectly calculates benefit amounts for the Household size;
    - ii. The benefit start date is later than the application date for RCA;
    - iii. The benefit start date is later than the TANF Cash Assistance eligibility date for PPP TANF Differential Payments;
    - iv. PPP was terminated incorrectly; or
    - v. The PPP contractor or RRP failed to issue payments for benefits due to the Client.
  - b. If an underpayment has been confirmed, the contractor must notify RRP of the error within 5 Days of when the underpayment was identified.
  - c. If the PPP Contracted Provider or RRP is correcting underpayments for any reason, the following must be verified:
    - i. Client's PPP cash program eligibility time period; and
    - ii. Whether the underpayment occurred during program eligibility.
    - iii. If the Client was eligible when an underpayment occurred, RRP will make a payment to the Client in the amount owed, even if the underpayment is identified after the PPP case has closed.

- iv. PPP Contracted Providers and RRP must clearly document the following:
    - A. Period for which the payment(s) are being made;
    - B. Client's eligibility status; and
    - C. Correct payment amount at the time of the underpayment.
  - d. A dated letter must be provided to the Client explaining the reason for the underpayment and the amount the Client is owed.
2. Overpayments
- a. Client Overpayments
    - i. Client error overpayments may occur if one of the following occurs:
      - A. The Applicant/Client failed to disclose income that would cause them to exceed the PPP income limit;
      - B. The Applicant/Client failed to report increases in Household income or a decrease in Household size;
      - C. The Applicant/Client received cash assistance from another state or federal government; or
      - D. The Applicant/Client moved out of state and failed to notify their designated PPP Contracted Provider.
    - ii. When the Applicant/Client provides or omits information or is not in compliance with program rules that results in an overpayment, RRP will:
      - A. Withhold or adjust subsequent payment(s) until the balance is recouped;
      - B. Request overpayment recovery if the Client's account cannot be debited to recoup the overpayment amount by RRP; and
      - C. Provide a dated letter to the Client explaining the reason for the overpayment and the amount owed to RRP.
  - b. PPP Contracted Provider Error Overpayments:
    - i. PPP Contracted Provider error overpayments may occur if one of the following occurs:
      - A. The Client was enrolled in PPP before the date of eligibility;

- B. The Client received benefits after the eligibility timeline; or
  - C. The Client's reported income was not correctly calculated and resulted in an overpayment.
- ii. If a PPP Contracted Provider identifies that they have overpaid a Client, they must notify RRP within 5 Days of the error.
    - A. RRP will determine whether the overpaid account will be debited to future payments or will go into overpayment recovery.
    - B. A dated letter must be provided to the Client explaining the reason for the overpayment and the amount owed to RRP.

## **I. Suspected Fraud and Fraudulent Activity**

1. RRP and employees of the PPP Contracted Providers will take appropriate steps to detect and prevent instances of Fraud/Fraudulent Activity. This includes:
  - a. Ensuring Clients are not receiving both RCA and PPP TANF Differential benefits (Dual Enrolled).
    - i. On a monthly basis, RRP must cross-check Clients receiving RCA and PPP TANF Differential Payments.
    - ii. When it is identified that a Client is enrolled in both RCA and PPP TANF Differential Payment benefits, a request must be sent to the PPP Contracted Provider caseworker or RRP (depending on who identified the Dual Enrollment) to review and document the Client's circumstances, within 5 Days.
  - b. Identifying overpayments due to a Client failing to report the following:
    - i. Dual Enrollment;
    - ii. A dependent child;
    - iii. Income that would cause the Client to exceed the PPP income limit;
    - iv. Increases in Household income or a decrease in Household size;
    - v. Cash assistance received from another state or federal government; or
    - vi. Clients moving out of state and not notifying their designated PPP Contracted Providers.
  - c. Investigating any discrepancies noted by PPP Contracted Providers or RRP;

- i. RRP and the employees of the PPP Contracted Provider will communicate with one another when a discrepancy is identified.
  - d. Documenting in ARRPODS:
    - i. The identification of suspected Fraud/Fraudulent activity;
    - ii. The reason(s) why Fraud/Fraudulent activity is suspected; and
    - iii. Any information gathered from the Client concerning the activity.
  - e. If the Fraudulent activity requires the Client's RCA and PPP TANF Differential Payments debit card to be closed, reissued, or adjusted, RRP must notify IRC of the discrepancy(ies) and suspected Fraud within 5 Days.
- 2. Substantiated Fraud/Fraudulent Activity
  - a. When a determination of Fraud/Fraudulent Activity has been made by IRC's banking partner:
    - i. The bank will communicate the information to IRC.
  - b. When a determination of Fraud/Fraudulent Activity has been made by IRC:
    - i. IRC will communicate the information to their banking subcontractor.
      - A. The bank will take the appropriate action based on the information provided by IRC.

## **J. Appeals**

- 1. All PPP Applicants/Clients must be provided the opportunity for a hearing to Appeal adverse actions made by RRP and/or PPP Contracted Providers.
  - a. Clients will receive a decision letter with their Appeal rights at least 10 Days prior to any adverse action.
  - b. Clients must request an administrative review within 15 Days from the date of their adverse action decision letter.
- 2. Appealed actions may include the following:
  - a. A benefit eligibility denial, suspension, reduction of assistance, or termination of assistance.
  - b. The State or its contractors not acting on an application within the timeliness standards pursuant to 45 CFR § 400.50.
  - c. The basis for an overpayment or underpayment calculated amount, and/or the level of recoupment.

3. The initial Appeal will be completed by the local PPP Contracted Provider.
  - a. Should the Client disagree with the initial Appeal decision, the Client can further Appeal the decision with RRP.
4. The Appeal will be conducted in accordance with 45 CFR § 400.50.

**K. Confidentiality**

1. Personally identifiable information collected by DES is confidential under A.R.S. § 41-1959 unless otherwise permitted by law or unless such confidentiality is waived in writing by the Applicant.
2. DES Employees and DES Contractors must refer to the *Address Confidentiality Program (ACP) Policy (DES Policy 1-01-45)* and the *DAAS ACP Policy* if an Applicant states that they participate in the Address Confidentiality Program (ACP). If the Applicant is an ACP participant, DES will accept the substitute address on all Application materials.

**L. Records Retention**

1. DES must maintain Records including financial documents and documents pertaining to eligibility determinations.
2. DES and its contractors must maintain a copy of all records for at least 6 years, according to *Records Management Policy and Procedures (DES 1-37-12)*, after all funds allocated to the state have been expended.

**Appendix 1:**

**PPP Contracted Providers**

<b>Provider</b>	<b>Areas served</b>
Arizona Immigrant and Refugee Services	Maricopa County
Catholic Charities Community Services	Maricopa County
International Rescue Committee	Pima and Maricopa Counties
Lutheran Social Services of the Southwest	Pima and Maricopa Counties
Catholic Charities Services of Southern Arizona	Pima County
Jewish Family and Children's Services	Pima County

## Appendix 2:

[PPP Use Case Scenarios Manual](#)