ADMINISTRATION FOR CHILDREN & FAMILIES
Office of Refugee Resettlement | 330 C Street, S.W., Washington, DC 20201
www.acf.hhs.gov/programs/orr

Afghan Refugee School Impact: Support to Schools Initiative

Policy Letter 22-12

May 09, 2022
Revised November 1, 2022[1]
Revised January 27, 2025 [2]

In Office of Refugee Resettlement (ORR) Dear Colleague Letters (DCLs) 22-04 and 22-13, ORR announced two Afghan Refugee School Impact (ARSI) supplements. These supplements fund Refugee Support Services (RSS) Refugee School Impact (RSI) set-aside programming specifically for children and parents eligible under the Afghanistan Supplemental Appropriations Act, 2022 and Additional Afghanistan Supplemental Appropriations Act, 2022 (ASA) (i.e., children and parents eligible for ASA and ORR benefits and services under the ASA).[3] While ARSI programming is limited to ASA-eligible participants, its benefits and services are the same as those under traditional RSI, and it is governed by the RSI guidance delineated in ORR Policy Letter (PL) 22-07.

Through this PL, ORR is announcing the ARSI Support to Schools (ARSI S2S) initiative. Like ARSI, ARSI S2S provides states[4] funding for services that lead to the effective integration and education of eligible Afghan children and youth.[5] However, given that ARSI S2S differs from traditional ARSI in terms of subrecipients and some allowable services, this PL defines the ARSI S2S initiative and provides guidance on its eligible populations, requirements, goals and services, equity and inclusion considerations, and reporting and monitoring requirements.

For information about funding allocations, see the relevant fiscal year DCLs on ARSI S2S funding allocations on the ORR website.

I. Eligible Populations

ORR PL 22-02 delineates ASA-eligible populations.[6] ARSI S2S services must focus on ASA-eligible school-aged children and their parent(s). By school-aged, ORR means from the age at which a child enters school, including pre-school or pre-kindergarten when applicable, until the age of 18.[7]

---

[1] November 1, 2022 revisions are footnoted.

[2] January 27, 2025: Removed former section on equity and inclusion

[3] November 1, 2022: Revision from ORR PL 22-10 to ORR PL 22-02. For specifics regarding ASA-eligibility, see ORR PL 22-02, *Additional ORR-Eligible Statuses and Categories and Acceptable Documentation Requirements for Afghan Nationals; ASA-Eligibility*.

[4] Throughout this PL, "states" refers to states and replacement designees administering the ARSI S2S initiative.

[5] Section 412(c) of the Refugee Act (8 U.S.C. 1522(c)), Congress authorized the Director of ORR (hereinafter "Director") to enter into contracts to provide services to address specific needs recognized by the Director. The Afghan Supplemental Appropriations Act, 2022, and the Additional Afghanistan Supplemental Appropriations Act, 2022, (ASA) provides additional funding for refugee and entrant assistance activities citizens and nationals of Afghanistan.

[6] November 1, 2022: See footnote #2.

[7] ASA-eligible youth 18 or older are eligible for the ARSI S2S initiative if the individual is enrolled in high school or a high school equivalent GED program.

II. Requirements

1. ***Subrecipients***[8]**:** If possible, states must direct all ARSI S2S funding to either a state education agency (SEA) or one or more local education agencies (LEA) and ensure that subrecipients procure and/or implement services that benefit eligible populations. If a state is unable to direct ARSI S2S funding to an SEA or LEA, the State Refugee Coordinator (SRC) may send a letter of assurance to their ORR Division of Refugee Assistance (DRA) Regional Representative/Analyst with (a) an explanation of the efforts the SRC took to direct funds to an SEA or LEA and (b) a justification for directing the ARSI S2S funds to one or more other subrecipients to procure and/or implement ARSI S2S services for eligible populations.

2. ***Awarding of Funds***: States must direct funding through SEAs, LEAs, or one or more other subrecipients to localities with the greatest need for S2S services. SEAs, LEAs, and other subrecipients must utilize a clear cost allocation methodology reflecting the number of ASA-eligible children and youth within each district or school who will benefit directly from ARSI S2S services, while also taking into account the presence or lack of existing resources.

3. ***Coordination with Title III of the Elementary and Secondary Education Act of 1965 (ESEA)***[9]: Prior to determining funding to an SEA, LEA, or other subrecipient, states should work with Title III directors at the state and/or school district level to identify areas of critical need, such as reviewing local Title III plans or a school's Title I schoolwide plan. The ESEA requires that Title III funds supplement rather than supplant other funding; collaboration between states and Title III directors should ensure effective use of both ARSI S2S and Title III funds.

4. ***Complementarity of Services***: States must consider how to use current RSI and ARSI funds to supplement existing services to ensure the most efficient and effective use of federal funding. The ARSI S2S supplement should complement existing programming aimed at assisting eligible populations (as delineated in section I of this PL), as well as meet the immediate needs of schools.

III. Goal and Services

The goal of the ARSI S2S initiative is to enhance state and local capacity to promote the academic performance and successful integration of eligible populations.

States should use ARSI S2S funds in the following ways to meet the ARSI S2S goal when applicable U.S. Department of Education funds have been exhausted:

[8] November 1, 2022: Revised from "Recipients" to "Subrecipients"

[9] For more information on Title III Language Instruction for English Learners and Immigrant Students, see: https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-legislation-table-contents/title-iii-part-a/.

1. Funding teachers and school-based counselors, including English Language Learner supports
2. Developing and implementing parent engagement and orientation activities
3. Building state capacity, including support for communities of practice among LEAs/schools (e.g., activities that focus on Afghan parent engagement or information exchange between ELL teachers instructing eligible clients)
4. Renting or enhancing temporary school facilities, including portable classrooms and converting (but not constructing) space[10]
5. Producing and securing educational resources ensuring full accessibility, including classroom materials, parent engagement resources, computers, digital services, and internet connections
6. Addressing transportation needs not met by other local, state, or federal resources
7. Developing and implementing data collection tools to track outputs and outcomes from this initiative
8. Administering after-school and/or summer learning programs, including summer academic acceleration

The above-mentioned examples are not exhaustive.

To ensure the broadest access to ASA-eligible children and their parent(s), services should be offered at a variety of times including during school hours, after school, and during the weekend, or online.

V. Data Collection, Reporting, and Monitoring

States must describe ARSI S2S services in their state plans and should ensure appropriate mechanisms to assess the need for, and track, ARSI S2S services.

States must develop and track specific, measurable, achievable, relevant, and time-bound annual outcomes for all ARSI S2S services. States must report the number of clients served, number of staff hired, program activities as outlined under section III above, type and frequency of services provided, outcomes, accomplishments, and challenges in the ORR-6 Program Performance Report (ORR-6) semi-annual schedules A and D. States must also submit a revised ORR-6 Annual Service Plan that incorporates the ARSI S2S initiative and the annual RSS Sub-Grantee Report (OMB Clearance Number 0970-0556). These forms, instructions, and the reporting schedule are available on the ORR website.

[10] For more information on allowable costs, see the ACF Property Guidance page.

States are required to submit data for all ASA-eligible populations served with ASRI S2S funding within ORR's State Arrival and Service Data Collection Process, using the ORR-5 data collection form. Instructions for the ORR-5 are also on the ORR website.

States must also submit the Standard Form 425 Federal Financial Report through the Payment Management System on a quarterly basis.

ORR will routinely monitor states and the services funded by the ARSI S2S initiative to ensure that states comply with this policy letter and the services provided align with specific activities described in their state plan. During monitoring, ORR will review a state's annual ARSI S2S outcomes and progress towards each goal. Additionally, ORR will assess how services are provided, identify promising practices, and observe trends for further analysis and information sharing. States are responsible for monitoring subrecipients for compliance and the achievement of objectives as outlined in their approved state plan.

If you have questions about this PL, email the Refugee Policy Unit at RefugeePolicy@acf.hhs.gov.

Sincerely,

Kenneth Tota
Director, Refugee Programs
Office of Refugee Resettlement