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

Refugee School Impact Program

Policy Letter 22-07

Initially published November 10, 2021;
Revised December 8, 2021[1]
Revised January 27, 2025[2]

This policy letter (PL) defines the Refugee Support Services (RSS) set-aside Refugee School Impact (RSI) program,[3] which provides states[4] funding for activities that lead to the effective integration and education of eligible children and youth. This PL supersedes ORR PL 19-01, providing guidance regarding the RSI program's eligible populations; assessment, goals, and services for a new RSI component, Early RSI; base RSI goals and services; and reporting and monitoring requirements. For information about funding allocations, see the relevant fiscal year Dear Colleague Letter(s) on RSI funding allocations on the ORR website.

Eligible Populations

States may provide RSI program services to all ORR-eligible individuals,[5] [6] from birth until the age of 18. Effective October 1, 2021, ORR has extended RSI eligibility to children from birth. ORR-eligible youth 18 or older are eligible if the individual is enrolled in high school or a high school equivalent GED program. States may provide RSI services to ORR-eligible populations within the first 5 years of their arrival or date of eligibility, but should prioritize services to children, youth, and their parents (if applicable) who have been in the United States for 1 year or less.

Assessment for Early RSI

Early RSI is comprised of services to ORR-eligible families with children from birth until the age they enter school (generally age 5 or 6, although geographic and individual circumstances may vary).

Each state should conduct an initial and periodic assessments to determine if Early RSI services are needed at the local level. All RSI states should approach the assessments by determining:

- The needs of ORR-eligible families with children age-appropriate for Early RSI.
- Unique challenges that ORR-eligible families face when trying to access child care, child care stipends, and Head Start/Early Head Start programming.
- The level of collaboration and cooperation with federal mainstream service providers, such as the State and Territory Child Care Development Fund Lead Agency Administrators and the Head Start Collaboration Offices.

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[1] The two December 8, 2021 revisions are annotated and are described within footnotes 5 and 6.

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

[3] Pursuant to 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.

[4] Throughout this PL, "states" refers to states and replacement designees that receive RSS funding from ORR to administer the RSI program.

[5] For a description of ORR-eligible individuals see ORR Policy Letter 16-01, its attached Documentation Guide, the ORR PL 16-01 FAQ, and ORR PL 22-02, as well as 45 CFR §§ 400.43 and 400.208.

[6] On December 8, 2021, ORR revised footnote 4 by striking the reference to rescinded ORR PL 21-07 and replacing it with ORR PL 22-02.

If the state does not intend to use RSI funding to support Early RSI services, the state should provide an explanation in its state plan under the RSS set-asides section about how families with children age-appropriate for Early RSI are being served through mainstream, refugee-specific, or other services.

Early RSI Program Goals and Services

Early RSI's goals are to promote access to child care, to ensure that ORR-eligible children are prepared to succeed in formal schooling, and to holistically serve families of eligible children. In other words, Early RSI is designed to raise the quality of services to children and families across the birth-to-kindergarten continuum. ORR also encourages partnerships with state child care programs to support these services and to benefit from opportunities made available through mainstream, refugee-specific, or other services.

If a state, through its initial and ongoing assessments, determines that these needs are not being met through mainstream, refugee-specific, or other services, the state should focus its efforts on the following areas to improve access, services, and outcomes for ORR populations:

- **Facilitating child care access and capacity development**, through improving systems, removing barriers to child care access to increase the number of ORR-eligible families accessing child care, providing specialized training on cultural competencies, and increasing child care providers' knowledge of ORR-eligible population needs.

- **Supporting early childhood education**, through funding programs that support the academic and social preparation of children for formal schooling (preschool or kindergarten); cognitive, social, and emotional growth of preschool-aged children; and age-appropriate English language literacy.

- **Facilitating parent integration and education**, through funding programs that support parents of preschool-aged children, through activities and resources such as orientations to parental resources and local school systems; opportunities for parent engagement including connections to peer supports and social groups; and parenting classes, including education on U.S. child welfare laws.

- **Providing holistic sessions with parents and children**, through collaborations involving educators and relevant community partners to support English language literacy, school preparedness, and community orientation through promotion of parent-child interactions.

Assessment for RSI

RSI is comprised of services to ORR-eligible children and youth ages 5 (or the age at which they enter school) until the age of 18.

Each state should conduct periodic assessments to determine if RSI services are needed at the local level based on:

- The needs of ORR-eligible families with children and youth age-appropriate for RSI.
- Unique challenges that ORR-eligible families face when trying to access the U.S. education system.
- The level of collaboration and cooperation with state and local education departments and local school districts,
- Existing specialized programming for newly arrived populations funded by Department of Education.

RSI Program Goals and Services
The RSI's program goals are to promote academic performance and successful integration of ORR-eligible children and youth ages 5 (or the age at which they enter school) until the age of 18 through facilitating education access, and increasing school districts' capacity to support children, youth and families.

If a state, through its periodic assessments, determines that these needs are not being met through mainstream, refugee-specific, or other services, the state should focus its efforts on the following areas to improve access, services, and outcomes for ORR populations:

- **Providing specialized services and support for eligible children and youth**, such as English as a Second Language classes, tutoring, newcomer or transitional programs, after school and summer programs, mentoring, behavioral health supports, and programming that supports integration.

- **Supporting families learning to navigate the U.S. education system***,* such as school-specific orientation for both families and students, navigators or cultural brokers, and language access.

- **Developing capacity for school staff and systems***,* through activities and resource such as specialized trainings for school staff around the unique and varied needs of ORR-eligible populations, ensuring language access by translating critical documents, interpretation, and specialized staff dedicated to working with ORR-eligible children, youth, and families.

The above-mentioned examples are not exhaustive.

States must provide all services in accordance with 45 CFR Part 400. States should direct funding to localities with the greatest need for Early RSI and base RSI services based on existing resources and the concentration of newly arrived ORR-eligible youth in the local schools. Services should be offered at a variety of times including during school hours, after school, during the weekend, or online.

Reporting and Monitoring
States must describe Early RSI (if applicable) and base RSI activities in their state plans and should ensure appropriate mechanisms to assess the need for, and track, Early RSI, and base RSI services.

States must[7] develop and track specific, measurable, achievable, relevant, and time-bound annual program outcomes for all Early RSI and base RSI activities. States must report the number of clients served, the 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, and submit the ORR-6 Annual Service Plan. States must also submit the annual RSS Sub-Grantee Report (OMB Clearance Number 0970-0556). These forms, instructions, and the reporting schedule are available on the ORR website.

States are required to submit data for all ORR-eligible population enrollments, including Early RSI (if applicable) and base RSI enrollees, 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 (SF) 425 Federal Financial Report through the Payment Management System (PMS) on a quarterly basis. For questions regarding PMS, please contact the PMS Help Desk at 877.614.5533 or pmssupport@psc.gov.

ORR will monitor the Early RSI and base RSI programs through routine monitoring, to ensure that states are in compliance with this policy letter and the services provided are in alignment with specific activities described in their respective state plan. During monitoring, ORR will review a state's annual program 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 sub-recipients for compliance and achievement of objectives as outlined in their approved state plan.

Resources

If you have questions about this PL, contact RefugeePolicy@acf.hhs.gov. ORR also encourages you to utilize ORR's Technical Assistance provider(s) for additional resources on serving refugees.

Sincerely,

Cindy Huang, Director
Office of Refugee Resettlement

[7] On December 8, 2021, ORR revised this sentence by replacing "should" with "must."