

Refugee Cash Assistance (RCA) Guide

The table below outlines key [RCA](#) rules, distinguishing which aspects are fixed by federal regulation and which areas allow state-level flexibility. This information is intended as a comprehensive reference for understanding where states can shape their RCA programs and where they must comply with uniform federal requirements.

Federal Requirements	State Flexibility
Eligibility Time Limit The Office of Refugee Resettlement (ORR) sets a uniform national time limit for RCA eligibility. Effective May 5, 2025, the maximum RCA eligibility period is 4 months for refugees entering ORR programs on or after that date. (DCL 25-13). This limit is determined by the ORR Director under 45 CFR 400.211 and applies to all states.	States cannot alter or exceed the federally prescribed RCA duration. The maximum length of RCA is set by federal authority and is uniform nationwide. Some states might choose to assist refugees beyond the federal time limit using state-only funds or separate programs, but that would be outside the federal RCA program and its funding constraints. Such state-funded extensions are optional and distinct from RCA, which must end once the federal time limit is reached.
Eligible Populations & Conditions Federal law strictly defines who is eligible for RCA. Only ORR-eligible populations who meet ORR's immigration status/identification requirements can receive RCA. They must also be within the federal time limit from the date of their U.S. entry or asylum grant. RCA is only for those ineligible for other federal cash aid; an applicant must be evaluated for Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), or other cash programs first and cannot get RCA if they qualify for those (45 CFR 400.53). Additionally, individuals cannot be full-time students in higher education while on RCA.	States cannot expand or restrict the categories of people eligible for RCA beyond what federal law and ORR policy allow. All the core eligibility rules (immigration status, time since arrival, ineligibility for federal cash aid, and the prohibition on full-time post-secondary students) are federally mandated; states must follow these exactly. For example, a state cannot decide to include other immigrant groups in RCA or unilaterally waive the rule that a refugee student in college is ineligible. States <i>can</i> ensure proper referrals (e.g., directing potentially eligible refugees to apply for TANF or SSI), but they cannot give RCA to anyone who should be on TANF/SSI instead.
Cash Benefit Levels In the Public/Private Model, Federal rules prescribe maximum monthly payment amounts by household size (45 CFR 400.60).	States have significant leeway in setting the actual RCA payment amounts, as long as they stay within the federal minimums and maximums. In a Public/Private Model, the state (in consultation with local resettlement agencies) proposes the income

Conversely, RCA payments cannot be lower than the state's comparable TANF cash benefit for the same household size. If a state's TANF grant level is higher than the federal ceiling, the state must pay the higher TANF amount. In the Public Model, The State agency must operate its RCA program consistent with the provisions of its TANF program (45 CFR 400.66). In both models, certain income and resources must be disregarded in determining RCA eligibility: a refugee's resources remaining in their country of origin, a sponsor's income/resources, and any initial resettlement cash grant.	eligibility standard and payment levels in its RCA plan. States can also implement "income disregards" or employment incentives to encourage early employment and self-sufficiency, as long as the total payments do not exceed the ORR ceiling. For example, a state could front-load slightly higher payments for the first couple of months or give a one-time employment bonus, but it must ensure the refugee's total aid over four months doesn't exceed 4x the monthly ceiling. In a Public Model, states mirror their TANF program's need standards and payment calculation rules. However, even within that framework, a state can adopt any TANF-consistent budgeting element for RCA via its state plan. For example, if a state's TANF program allows certain child care costs to be deducted from income, it can choose* to apply the same deduction when determining RCA benefit amounts.
Employment & Training Requirements Per federal RCA policy, all employable RCA recipients must participate in employment services as a condition of receiving aid (45 CFR 400.75). Specifically, any RCA client who is not exempt is required to do the following: register for employment services with an appropriate agency and, within 30 days of starting RCA, begin participating in available job training or ESL classes; go to job interviews arranged by the agency or state refugee program; and accept any appropriate offer of employment that is made.	States have the authority to define exemptions to the work requirements (45 CFR 400.76) and to design the employment services program in a way that fits their refugee population (45 CFR 400.79). For example, a state could exempt single parents with an infant, elderly refugees above a certain age, those with serious medical conditions, or other categories it deems unable to work. Additionally, states administer the "good-cause" provisions and supportive services: for instance, a state will define what constitutes "good cause" for missing an interview or refusing a job and provide services like child care or transportation assistance to facilitate compliance.
Sanctions for Non-Compliance with Employment Requirements Federal regulations require strict enforcement of the employment requirements. If an RCA client fails or refuses to comply with their employability plan or any mandatory work-related activity without good cause, the state must terminate RCA benefits for that individual as a sanction (45 CFR 400.82). The sanction's	States have some flexibility in how they implement the sanction process and define "good cause." For instance, states can develop their own written criteria for what counts as good cause to excuse a refugee's failure to participate. States also handle the notification and conciliation process leading up to termination. For example, a state can choose* to add steps like a warning letter or a "conciliation period" before formal termination. The process of



effect can apply to the whole case: in a single-person case, benefits stop; if it's a family, the non-compliant member is removed from the grant calculation. Federal policy requires that sanctions be accompanied by due process: the individual must have had an opportunity to show good cause for non-compliance, and if no good cause is found, a 10-day advance notice of termination must be given.	mediation or appeal is also a state matter: states can offer mediation meetings or pre-termination reviews to ensure a refugee understood the requirements, though ultimately an impartial hearing must be available per federal due process.
Payment Issuance (Timing & Method) ORR regulations require that RCA payments be made on a monthly basis to eligible refugees (45 CFR 400.60); grants are either issued each month or divided into more frequent installments; but cannot be less frequent than once per month. Applications for RCA must be processed promptly: states are required to determine eligibility within 30 days of application (45 CFR 400.50). If an applicant has an urgent need, the agency “should process the application as quickly as possible” and can issue an initial payment on an emergency basis (45 CFR 400.52). Federal regulations also allow states to start benefits from the date of application specifically to expedite assistance to newly arrived refugees (45 CFR 400.66). This means a refugee who applies, for example, on the 10th of the month could have their RCA begin effective that date (prorated if applicable), ensuring no delay in support. While federal regulation permits “vendor payments” (e.g., rent paid directly to a landlord) as a method, such payments still count as cash assistance since they fulfill the refugee’s basic needs.	Within the federal framework, states (and administering agencies) decide how RCA is issued. They choose* the mechanism of payment (EBT, direct deposit, paper checks, reloadable debit cards) as long as it remains cash-based. States also set the payment schedule: while federal rules require at least monthly issuance, states may split the grant into semi-monthly or biweekly installments. In public/private programs, the state and agencies establish a uniform schedule. States can adopt the “date of application” start option, beginning RCA retroactive to the application date, and they design emergency issuance procedures for urgent needs. Federal rules permit vendor payments, but states decide whether to use them, ensuring clients still have access to cash. Finally, states are responsible for integrating RCA delivery into their existing systems, deciding if RCA will be managed through the same IT system as other benefits, what day of the month payments are issued, how recoupments of overpayments are handled, etc. All these operational details are under state control, provided they do not conflict with federal requirements.

**States wishing to implement these RCA program features should seek approval through the [State Plan submission and approval process](#).*

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