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Refugee Resettlement in Wyoming: A How-to Guide

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Refugee Resettlement in Wyoming: A How-to Guide

Gabriel Selting

University of Wyoming Honors Thesis

May 15, 2018

Abstract: Amid a global refugee crisis defined by the highest levels of displaced persons on record, Wyoming is the single state in the U.S. without a Refugee Resettlement Program (RRP). Wyoming “exceptionalism” in this regard is an affront to America’s traditional role as the leader in refugee admissions and human rights advocacy dating back the mid 1940s. The purpose of this article is to establish a framework for Welcome Wyoming’s initiative to create an RRP. This article proceeds by laying bare the various models of refugee resettlement, and then selects the appropriate model considering the political climate, funding practicalities, and the federal Refugee Admissions Program structure. Simply put, this is a state-specific, how-to guide of developing an RRP from start to finish. In brief, I suggest that Welcome Wyoming become a non-profit 501(c)(3) and pursue a local affiliate relationship with one of the 9 federally recognized refugee resettlement volunteer agencies (VOLAGS). Welcome Wyoming should then work to join the Wilson Fish program through the Office of Refugee Resettlement, thereby establishing a funding source for resettlement services. Refugee resettlement is politically charged, legally complex and administratively challenging. Above all else, however, it is the right thing to do. It is high time that Wyoming joins the global community and helps shoulder the responsibility to protect human rights, providing an option for safe, reliable, and productive refugee resettlement.

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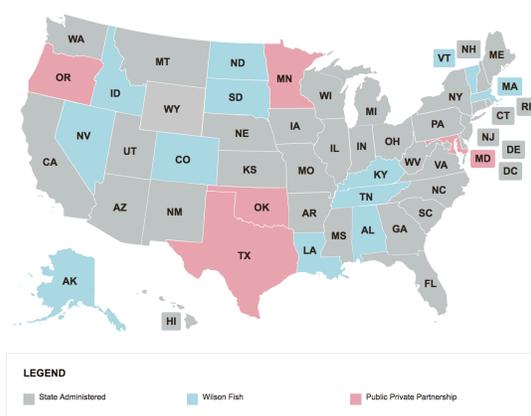
1. Acronyms

CMA- Refugee Cash and Medical Assistance
IOM: International Organization for Migration
MOU: Memorandum of Understanding
PRM: U.S. Bureau of Population, Refugees, and Migration
RAP- Refugee Admissions Program
RPP- Reception and Placement Program
RRP: Refugee Resettlement Program
RSC: Refugee Support Centers
TANF: Temporary Assistance for Needy Families
UNHCR: United Nations High Commission for Refugees
USCIS: U.S. Citizen and Immigration Services
VOLAGS: 9 Voluntary Agencies (authorized to resettle refugees)

2. INTRODUCTION

Amid a global refugee crisis defined by the highest levels of displaced persons on record, Wyoming is the single state in the U.S. without a Refugee Resettlement Program (RRP) filed with the federal government.¹ The purview of the federal government over matters of immigration ensures that all states— even states and governors that nominally oppose refugee resettlement— resettle refugees.² All states but one. Wyoming distinguishes itself among 50 states as the sole jurisdiction that is *functionally* unable to resettle refugees, which, unlike other states, ensures that no direct resettlement takes place (See Figure I below). Wyoming's borders remain nominally and functionally closed to refugee resettlement despite the unprecedented 65.6 million displaced persons worldwide. Closed despite the 5.5 million Syrian refugees displaced outside of their country.³ Closed despite the fact that 49 other states play their role in the resettlement effort, albeit begrudgingly in some cases.

Figure 1: Map of RRP Models by State



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¹ UNHCR, "Figures at a Glance"

² Arizona v. United States

³ UNHCR, "Figures at a Glance"

⁴ ORR, "Find Resources and Contacts in Your State"

To be sure, the federal government, i.e. not the state governments and certainly not the state of Wyoming, determines the number of refugees admitted to the U.S. before the start of each fiscal year.⁵ Why then is it so important to the global refugee community that Wyoming develop an RRP? The answer to this question is three-fold. When the President determines refugee admissions levels in consultation with Congress, s/he does so based on the domestic capacity to accommodate resettlement.⁶ Adding another state to the federal Refugee Admissions Program (RAP) builds the U.S.' domestic capacity to offer admissions slots by presenting new employment opportunities, affordable housing options that are characteristic to the state of Wyoming, and generous land allotments.

Beyond developing the domestic capacity for refugee admissions, creating an RRP in Wyoming is an important symbolic gesture indicating that the U.S. is ready to take on some of the onus in shouldering the global refugee crisis. Wyoming "exceptionalism" in this regard is an affront to America's traditional role as the leader in refugee admissions and human rights advocacy dating back the mid 1940s.⁷ On the contrary, fifty states *united* in welcoming refugees would serve as a counterweight to the extant rhetoric in Washington, sending the powerful message to the global refugee community that the U.S. is committed to protecting international human rights. Finally, Wyomingites stand to benefit from the creation of an RRP in the state- from the diversity of thought and culture in tow with the introduction of refugees in a community. As director of the College of Southern

⁵ Immigration and Nationality Act

⁶ Ibid.

⁷ Gill Loescher, "*Calculated Kindness*"

Idaho Refugee Program Zeze Rwasama notes, very few people who have met a refugee remain opposed to their resettlement.⁸

In 2013, Wyoming Governor Matt Mead elected to pursue a Public Private Partnership model of refugee resettlement in Wyoming; however, in response to backlash throughout the state and to the Paris attacks that stirred fear into the public over the word “refugee”, Governor Mead released a press statement “demanding the refugee process be halted until it is guaranteed to provide the security demanded by Wyoming and United States citizens”.⁹ Wyoming has since taken no steps toward establishing an RRP, and in 2016, the Wyoming House of Representatives introduced House Bill 0047 that would have rendered the State Legislature the sole authority to establish an RRP in Wyoming. This bill failed introduction in the Senate.¹⁰ For more information detailing the history of refugee resettlement in Wyoming, see Suzie Pritchett’s article titled: *Refugee Federalism in Wyoming*.

Tailing on prior efforts over the last several years, a group of concerned citizens based in Casper, WY created an organization called Welcome Wyoming in March of 2018, with the intention of establishing an RRP and bringing refugees directly to the state of Wyoming. I am one of the founding members alongside Michael Miller, Robert Hall, Luanne Marshal, Michelle Heaphy, Carol Solie, Scotia Sutherland, Audrey Gray, Nick & Maggie Murdock, Kimberly Kunckel, Jai-Ayla Quest, and Tyler Quest. At the time of writing, Welcome Wyoming has no official status;

⁸ Zeze Rwasama

⁹ Pritchett, “*Refugee Federalism in Wyoming*”

¹⁰ Ibid.

however, the unofficial organization serves as a rallying point for various stakeholders, community leaders, students, health professionals, and educators with the collective goal of establishing an RRP. Unfortunately, the creation of an RRP from start to finish, considering the gamut of possibilities and program customizations, remains a relatively unmapped process. Readers may consider this article a map.

The purpose of this article is to establish a framework for Welcome Wyoming's initiative to create an RRP. This article proceeds by laying bare the various models of refugee resettlement including state-administered, public-private, and Wilson Fish, and then selects the appropriate model considering the political climate, funding practicalities, and the federal RAP structure. Simply put, this is a state-specific, how-to guide of developing an RRP from start to finish. In brief, I suggest that Welcome Wyoming become a non-profit 501(c)(3) and pursue a local affiliate relationship with one of the 9 federally recognized refugee resettlement volunteer agencies (VOLAGS). Welcome Wyoming should then work to join the Wilson Fish program through the Office of Refugee Resettlement (ORR), thereby establishing a funding source for core resettlement services (i.e. employment services, case management, English as a Second Language, interpreters, cash and medical assistance, primary/secondary schooling... etc.) entirely separate of the Wyoming state government. This article will unpack this proposal in the following sections.

3. METHODS

The research for this article relied on a qualitative approach in order to chart the comprehensive process of refugee resettlement and to tailor a program sensitive to the needs, capacities, and practicalities of Wyoming. Having worked on case preparation for asylum applicants at the University of Wyoming International Human Rights Clinic, I offer a degree of familiarity to the subject and the process of determining asylee/refugee eligibility, underpinning my interest in conducting this research. The Clinic operated under the license of Suzie Pritchett, who provided a wealth of information about the legality and history of resettlement efforts in Wyoming.

An extensive review of legal/academic literature and government documents formed the basis of the research for this article. Documents of distinct relevance were the Code of Federal Regulations, the Program Guidelines for the Wilson Fish Alternative Program, the Wilson Fish Call for Funding Applications, and the ORR's Annual Report to Congress. Having secured approval from the Institutional Review Board to conduct interviews with human subjects, I approached 13 different actors involved in refugee resettlement at the national, state, and local-agency levels. The Department of Health's ORR list of key contacts provided a jumping-off point such that I was able to conduct six interviews:

- Ms. Jan Parks, State Refugee Resettlement Coordinator and Refugee Health Coordinator (State-Administered Program)
- Mr. Jonathan Owen, State Refugee Resettlement Coordinator and Director of Local Resettlement Agency Lutheran Social Services (Wilson Fish Program)
- Ms. Dee Daniels Scriven, Office of Refugee Resettlement Regional Representative

- Mr. Zeze Rwasama, Director of the College of Southern Idaho Refugee Program
- Mary Poole, Director/Founder of the Soft Landing Missoula
- Mr. Jeffery Kirk, author of *10 Million to 1: Refugee Resettlement- A How-to Guide*; volunteer at local resettlement affiliate of LSS Milwaukee

The two state resettlement coordinators and their states will remain anonymous, consistent with the requests of the interviewees. Important to note, however, is that Ms. Parks and Mr. Owen represent states from both models of refugee resettlement: State Administered and Wilson Fish, respectively. Although the Public/Private Partnership model is nominally neglected, Ms. Parks' RRP contracts an array of refugee transitional services, functionally rendering it a hybrid of the Public/Private Partnership and State Administered models. This observation is consistent with Ms. Scriven's observation that oftentimes, officially designated State Administered programs and Public/Private Partnership programs operate much in the same way.¹¹ The functions of each model will be discussed in greater detail later in the article.

4. General Information

At the offset, the reader must understand what exactly a refugee *is* and what exactly a Refugee Resettlement Program (RRP) *does*. A refugee is someone who “demonstrates that they were persecuted or fear persecution due to race, religion, nationality, political opinion, or membership in a particular social group... is located outside of the United States... (and) is not firmly resettled in another country”.¹² For

¹¹ Dee Daniels Scriven

¹² USCIS, “*Refugees*”

domestic purposes, people can also receive refugee designation if they are of special humanitarian interest to the United States; members in this group would include Afghans, Iraqis, Cubans, and Haitians.¹³

The national RRP is the regulatory framework in which the U.S. welcomes refugees, resettles them in various localities throughout the country, and provides an array of services designed to promote refugee integration and economic self-sufficiency.¹⁴ The process of refugee resettlement begins with refugee designation and ends once the refugee is no longer eligible for core and social services through their local resettlement agency. For the purposes of this article, the RRP components *most* relevant to mapping out an RRP in Wyoming involve the provision of services and the funding of services. So, what exactly are the services that characterize an RRP?

Refugees are entitled to three classifications of services known as placement services, core services, and social services. The placement services are channeled through the Reception and Placement Program (RPP), which will be discussed in greater detail later in this article. These services facilitate the placement of the refugee in their determined locality, covering the initial costs associated with resettlement.¹⁵ Generally, these services cover initial lodging feeds, transportation, apartment furnishings, a health screening... etc.

The second and third categories of services to which refugees are entitled fall under the purview of the Refugee Transition Program (RTP), which will also be

¹³ Ibid.

¹⁴ Code of Federal Regulations

¹⁵ Pritchett, *Refugee Federalism in Wyoming*

discussed later on. The core services funded by the Office of Refugee Resettlement (ORR) are Refugee Cash Assistance and Refugee Medical Assistance, collectively identified as Cash and Medical Assistance (CMA). Given that some states supplement the programs whereas others do not, CMA varies slightly state to state. Generally speaking, these programs provide CMA for up to eight months following initial resettlement. In the state of Washington, for example, Refugee Cash Assistance provides \$320 USD/month to a single eligible refugee.¹⁶ CMA operates much in the same way as does Medicaid and Temporary Assistance for Needy Families (TANF). In fact, refugees eligible for Medicaid cannot file for Refugee Medical Assistance. Likewise, refugees eligible for TANF cannot file for Refugee Cash Assistance.¹⁷ Core services also provide care for unaccompanied refugee minors.

Social services offered through the RTP are designed to encourage economic self-sufficiency of refugees, often taking the form of employment trainings, English teaching programs, and case management. The Immigration and Nationality Act provides the following federal obligation and intention of the federal government with respect to refugee social services; it intends to:

i) make available sufficient resources for employment training and placement in order to achieve economic self-sufficiency among refugees as quickly as possible, (ii) provide refugees with the opportunity to acquire sufficient English language training to enable them to become effectively resettled as quickly as possible, (iii) insure that cash assistance is made available to refugees in such a manner as not to discourage their economic self-sufficiency... and (iv) insure that women have the same opportunities as men to participate in training and instruction.¹⁸

¹⁶ Washington, *“Refugee Cash Assistance”*

¹⁷ ORR, *“About Cash and Medical Assistance”*

¹⁸ Immigration and Nationality Act

A comprehensive list of social and core services provided by a local RRP may be found in section 5, subsection IV of this article.

5. PROCESS OF RESETTLEMENT

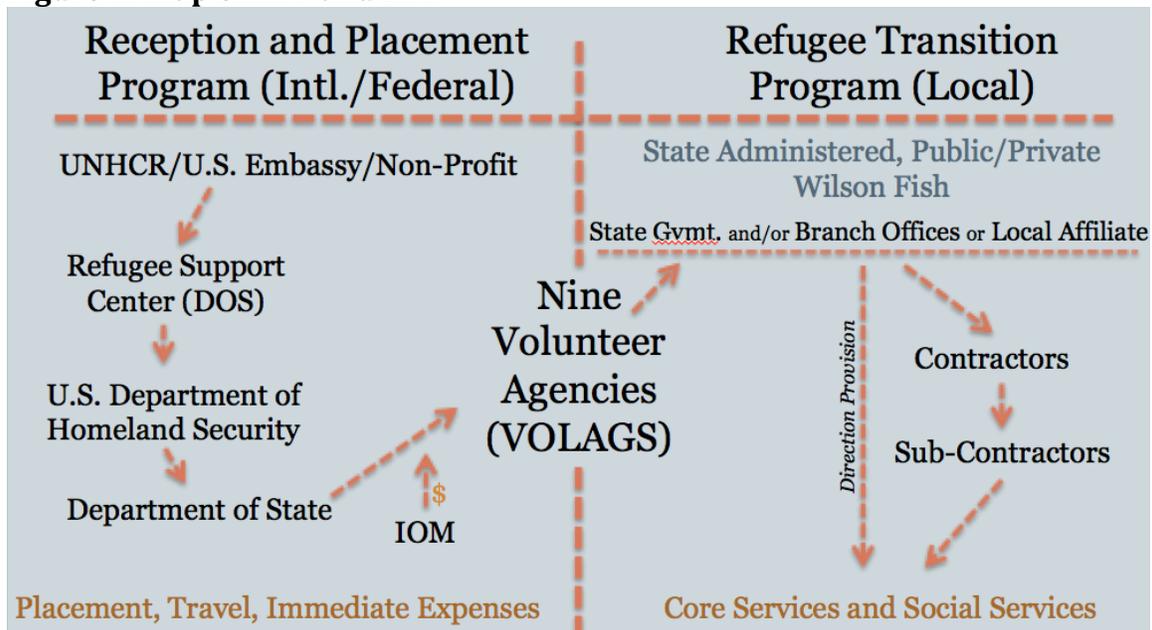
At first glance, the process of resettling refugees appears relatively straightforward- the U.S. Government authorizes a case for resettlement and provides refuge by way of physical asylum and a host of support services. Upon closer examination, however, refugee resettlement is a tremendously complicated process that involves a wide array of public and private actors including the UNHCR; the International Organization for Migration (IOM); the Department of Homeland Security's U.S. Citizen and Immigration Services (USCIS); the Department of State's U.S. Bureau of Population, Refugees, and Migration (PRM); the U.S. Department of Health and Human Service's ORR; nine federally recognized voluntary refugee resettlement agencies (VOLAGS); 350+ local affiliate resettlement agencies; local and state legislatures; and thousands of private service contractors.¹⁹ As an organization such as Welcome Wyoming looks to develop an RRP, the daunting questions arise; where to start? What role does each actor play? This section will lay out a detailed map of how the refugee resettlement process takes place from start to finish, discussing the various actors' roles along the way.

Refugee resettlement is a bipartite system comprised of 1) the Reception and Placement Program (RPP) and 2) the Refugee Transition Program (RTP). Though the RPP and the RTP both serve to facilitate the umbrella "Refugee Resettlement Program", they are separate processes altogether, and perhaps most importantly,

¹⁹ UNHCR, "*Resettlement in the United States*"

they are funded by different agencies. Often, the term “Refugee Resettlement Program” (RRP) is interchanged with the terms RPP and RTP; however, for the purposes of developing an operational local resettlement facility, this article makes a distinction between the RPP and the RTP. A visual summarizing the functions, processes, and goals of both the RPP and the RTP may be found below in Figure II. This section of the article will explore the process of refugee resettlement sequentially in the following subsections: Resettlement Agencies, State Resettlement Methods, the Reception and Placement Program, the Refugee Transition Program, and How a Local RRP Begins.

Figure II: Map of RPP and RTP



i. Resettlement Agencies (VOLAGS)

At the center of the RPP/RTP complex is the nine federally recognized, private, national refugee resettlement volunteer agencies, threading all components of U.S. refugee resettlement. The nine private agencies serve as the connective tissue between the national RPP and the local RTP. Though matters of immigration fall

under the purview of the federal government, the U.S. Government has long relied on partnerships with church groups and other nonprofits to fund and deliver key resettlement services for refugees.²⁰ While the U.S. Department of State and the U.S. Department of Health and Human Services now fund a significant portion of resettlement costs to relieve the financial burden previously assumed by private organizations, the U.S. Government is still heavily dependent on the expertise, resources (fiscal and otherwise), and networks maintained by private resettlement agencies.²¹ Today, there are nine such voluntary agencies (heretofore referred to as VOLAGS) with whom the U.S. Department of State has entered Cooperative Agreements:²²

- Church World Service
- Ethiopian Community Development Council
- Episcopal Migration Ministries
- Hebrew Immigrant Aid Society
- International Rescue Committee
- U.S. Committee for Refugees and Immigrants
- Lutheran Immigration and Refugee Services
- United States Conference of Catholic Bishops
- World Relief Corporation

Each VOLAG maintains an extensive network of local resettlement agencies situated throughout 49 states and 185 localities; in 2017, the VOLAGS network comprised 312 local resettlement agency offices.²³ Each local resettlement agency works closely with its parent/affiliate VOLAG to facilitate both refugee placement and transition services.

²⁰ Charles Hohm et al., *"A Quantitative Comparison"*

²¹ Ibid.

²² ORR, *"Voluntary Agencies"*

²³ James Xi, *"Refugee Resettlement Federalism"*

The local resettlement agencies are broken into two different types: branch offices and local affiliates. Branch offices occur when a VOLAG opens an office in a locality and maintains direct administrative and functional control.²⁴ Some VOLAGS will only resettle refugees through a branch office. The International Rescue Committee (IRC), for example, will only provide RPP and RTP services through a local IRC branch office.²⁵ The IRC office in Missoula, MT operates under the direct administrative control of the national IRC office. The local affiliate framework, on the other hand, offers a somewhat more flexible arrangement for non-VOLAG NGOs looking to establish a resettlement program. Under a local affiliate relationship, an organization develops and maintains a memorandum of understanding (MOU) with a given VOLAG, detailing the process by which the organization will provide core services and social services to refugees. Furthermore, the local affiliate manages the reception and placement of refugees under the aegis of the affiliate/parent VOLAG.²⁶ As stated previously, certain VOLAGS exclusively resettle refugees via branch offices, whereas some, such as the Ethiopian Community Development Council, permit local affiliate agreements.²⁷ As a reminder to the reader, this article argues that Welcome Wyoming should pursue a local affiliate relationship with a willing VOLAG; subsection V entitled “How a Local RPP Begins” will provide further details on this process.

²⁴ Pritchett, *“Refugee Federalism in Wyoming”*

²⁵ Mary Poole

²⁶ Pritchett, *“Refugee Federalism in Wyoming”*

²⁷ Dee Daniels Scriven

The VOLAGS have a defined place in the regulatory framework of refugee resettlement as outlined in the Immigration and Nationality Act and in part 400 of the Code of Federal Regulations.^{28 29} The VOLAGS are required to conduct weekly meetings Arlington, Virginia at the Refugee Processing Center in Arlington, Virginia with the Bureau for Population, Refugees, and Migration (PRM).³⁰ At the weekly conventions, the various actors discuss each VOLAG's capacity for resettlement by locality.³¹ The PRM will present the VOLAGS with upcoming cases approved for resettlement. In order to determine which VOLAG can best serve the needs of each incoming refugee and therefore assume responsibility for case resettlement, the agencies will conduct a case-by-case analysis that includes the following factors:³²

33 34 35 36

- Existing Refugee Populations
- Agency Resources (Language, financial... etc.)
- Probability of Developing Economic Self Sufficiency
- Demographics of Each Refugee (Race, Religion, Ethnicity, Language)
- Size of Family
- Existing Populations and Family Members in the Area
- Locality Preferences
- Federal/State Preferences

For example, at the weekly convention, the PRM could present the VOLAGS with a Congolese family approved for resettlement that speaks only Lingala and has a child with a trauma-induced stress disorder. The VOLAG connected to the local

²⁸ Code of Federal Regulations

²⁹ Immigration and Nationality Act

³⁰ James Xi, *"Refugee Resettlement Federalism"*

³¹ Pritchett, *"Refugee Federalism in Wyoming"*

³² Ibid.

³³ James Xi, *"Refugee Resettlement Federalism"*

³⁴ Immigration and Nationality Act

³⁵ Congressional Research Services, *"Refugee Resettlement Assistance"*

³⁶ Dee Daniels Scriven

resettlement agency that can best accommodate the specific needs of the Congolese family will likely manage the resettlement case.³⁷ Should the incoming family already have family members in the U.S., the PRM and the VOLAGS make a concerted effort to resettle the refugee(s) in the same geographic area.³⁸

In the last year, the national RRP has undergone a large-scale reduction due to fiscal constraints and a decline in refugee admissions.³⁹ The Immigration and Nationality Act requires the VOLAGS to submit a quarterly report detailing the use of federal monies, a performance analysis, and the number of resettled refugees specific to each locality.⁴⁰ As refugee admissions decrease, the number of refugees designated to each VOLAG by the PRM decreases in kind, stretching thin the oversight and management costs of each VOLAG per refugee. To optimize the use of federal grants that help pay administrative costs of the VOLAGS, in December of 2017, the PRM effectively mandated that the VOLAGS close all local resettlement offices that did not resettle a minimum of 100 refugees per year.^{41 42 43} In response, the VOLAGS concentrated their resources into larger urban local resettlement agencies and shut down peripheral resettlement sites that were unable to sustain 100+ resettlement cases per year. Refugee admissions ebb and flow depending on the president in office; the Refugee Resettlement Act of 1980 authorizes the President to determine the yearly admissions quota in consultation with the U.S.

³⁷ Ibid.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ Immigration and Nationality Act

⁴¹ Zeze Rwasama

⁴² Dee Daniels Scriven

⁴³ Mary Poole

Congress.⁴⁴ In the future, when refugee admissions rise and the VOLAGS are expected to undertake a greater workload in resettlement, the VOLAGS may look to expand their network of local resettlement offices by way of branch offices and local affiliates alike.

ii. State Resettlement Methods

As shown above, the VOLAGS are instrumental to the national Refugee Resettlement Program; they thread the RPP and the RTP together, serving as an intermediary between the two distinct stages of resettlement. In order to actually provide placement and transition services, however, the VOLAGS and the federal government must navigate the regulatory framework established by the Code of Federal Regulations and the ORR. This subsection explores the way by which the VOLAGS and the federal government interact with the states and localities, both in terms of refugee placement and the provision of core/social services. As discussed in the background section, an RRP assumes two central provisions: refugee placement and funding channels. The forthcoming models are simply variations of funding channels, differing primarily by their levels of state involvement. Altogether, there are three models of refugee resettlement: State Administered Programs, Public-Private Partnerships, and the Wilson Fish Program.⁴⁵

A. State Administered Program

Under a state administered resettlement plan, “the state government is the primary administrator of federal monies and coordinates all aspects of refugee

⁴⁴ Gill Loescher, “*Calculated Kindness*”

⁴⁵ Pritchett, “*Refugee Federalism in Wyoming*”

resettlement in the state”.⁴⁶ The VOLAG responsible for resettlement coordinates the reception and placement of the refugee, and the VOLAG will provide one-off costs (provided by the PRM) that cover the refugees’ immediate expenses.⁴⁷ From then on, the state coordinates all aspects of the RTP (Refugee Transition Program).⁴⁸ Traditionally, the state will distribute CMA provided entirely by the Office of Refugee Resettlement (ORR).⁴⁹ Other services that the state elects to provide may either be furnished directly by the state or contracted out to various service providers. Though funding for these core and social services generally comes from the ORR, the state is solely responsible for channeling the funds to direct state support resources, to VOLAG affiliates/branch offices, or to other private contractors.⁵⁰ The federal government requires that the state employ a state Refugee Resettlement Coordinator and a Refugee Health Coordinator- positions that can be staffed by the same employee in states with minimal resettlement, but are nonetheless funded by the ORR.^{51 52}

The ORR fully reimburses the state for all CMA, ensuring that no core resettlement service costs are incurred upon the state. CMA expenses are calculated upon the estimated cost of CMA per refugee for eight months following resettlement.⁵³ Other social services may be funded by specific grants and funding programs housed in the ORR such as TAG grants, the Cuban/Haitian Program, the

⁴⁶ Ibid.

⁴⁷ Ibid.

⁴⁸ Ibid.

⁴⁹ Dee Daniels Scriven

⁵⁰ Jan Parks

⁵¹ Ibid.

⁵² Code of Federal Regulations

⁵³ ORR, “*Annual Report to Congress*”

Refugee School Admissions Program, and various social services formula funds.⁵⁴ While these funding pools are sufficient to provide the full extent of services for some states, others may elect to use state monies to pay for additional services.^{55 56} VOLAGS may also provide monies to their local branch offices/affiliates to fund specific refugee support programs and services.⁵⁷ As with the Public-Private Partnership Model (and to some extent the Wilson Fish Model), under a State Administered Program, the state submits its plan to the ORR at the beginning of each fiscal year,⁵⁸ the contents of which will be discussed in further detail in the section: “How a Local RRP Begins”.

B. Public-Private Partnership Model

The Public-Private Partnership (PPP) model of refugee resettlement resembles the State Administered Models in most respects; Dee Daniels Scriven, the Regional Representative for the ORR, states that a PPP and a State Administered Model could look exactly the same- the question of import revolves around *who* is going to provide *which* services, a debate that is settled between the state and the present VOLAG(S).⁵⁹ Generally, a PPP model directly provides Cash and Medical Assistance to the refugees- though those funds will likely still be channeled to the local resettlement agency via the state.⁶⁰ Other social services may be provided in exactly the same manner as a State Administered Program: directly via the state,

⁵⁴ Ibid.

⁵⁵ Jan Parks

⁵⁶ Jonathan Owen

⁵⁷ Zeze Rwasama

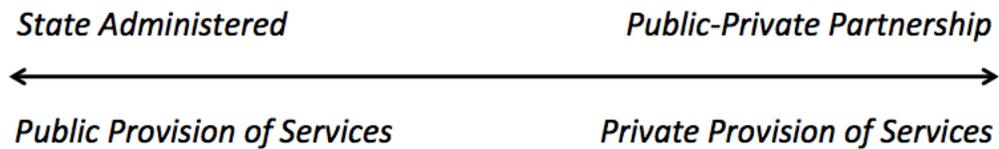
⁵⁸ Code of Federal Regulations

⁵⁹ Dee Daniels Scriven

⁶⁰ Pritchett, “*Refugee Federalism in Wyoming*”

through the VOLAG branch office/affiliate, or through local contractors.⁶¹ It may be useful for readers to regard the *functionality* of State Administered models and PPP models on a continuum of varying state involvement in the direct provision of services (see figure III below).

Figure III: Functional Continuum of Resettlement Models



C. Wilson Fish Program

The Wilson Fish model of refugee resettlement developed in 1985, as the need emerged for a model of resettlement that could operate largely without the involvement of the state government.⁶² Effectively, the Wilson Fish Program is a pool of funding housed in the ORR that allows VOLAGS and their network of local resettlement agencies to operate an RPP and an RTP without the state government.

The ORR states:

The Wilson-Fish (WF) program is an alternative to traditional state administered refugee resettlement programs for providing assistance (cash and medical) and social services to refugees. The purposes of the WF program are to:

- Increase refugee prospects for early employment and self-sufficiency
- Promote coordination among voluntary resettlement agencies and service providers
- Ensure that refugee assistance programs exist in every state where refugees are resettled ⁶³

⁶¹ Dee Daniels Scriven

⁶² Pritchett, "Refugee Federalism in Wyoming"

⁶³ ORR, "Wilson Fish Program Guidelines"

Awardees of Wilson Fish funds are local resettlement agencies- branch offices and local affiliates alike- that need funding to provide core and social services because their host state does not operate an RRP and therefore cannot channel ORR monies to local agencies, as is the case in State Administered and PPP models.⁶⁴ Wilson Fish grants will generally fund the Refugee Cash and Medical Assistance, the state Refugee Resettlement/Health coordinator position, direct service staff, funding eligibility specialists, English as a Second Language, case management, and a variety of social services.^{65 66}

The Wilson Fish Cash and Medical Assistance Grant provides CMA funding and is determined by the projected costs of CMA per refugee for eight months after resettlement, identical to the CMA provisions under State Administered and the PPP models.⁶⁷ The Wilson Fish CMA Grant also covers administrative expenses associated with providing CMA services.⁶⁸ The Wilson Fish program also manages the Formula Refugee Social Services (RSS) Grant: “Social services funding will be based upon each State's arrivals over the prior three fiscal years, adjusted for secondary migration”.⁶⁹ In addition, Wilson Fish program awardees are also eligible to apply for grants to fund other social services as mentioned in the previous sections including TAG grants, the Cuban/Haitian Program, the Refugee School

⁶⁴ ORR, *“Funding Opportunity Announcement”*

⁶⁵ Jonathan Owen

⁶⁶ ORR, *“Wilson Fish Program Guidelines”*

⁶⁷ ORR, *“Funding Opportunity Announcement”*

⁶⁸ *Ibid.*

⁶⁹ *Ibid.*

Admissions Program, the Preferred Communities Program, and various social services formula funds.⁷⁰

The Wilson Fish alternative program is demonstrably a suitable alternative to the State Administered and PPP models of refugee resettlement, notably because the local resettlement agencies have access to all the same funding. The local resettlement agencies still maintain their branch/affiliate relationship with their associated VOLAG; the primary difference is that funding for core services and social services is (usually) no longer channeled through the state. In fact, researchers in San Diego conducted a side by side, quantitative comparison of two service provision agencies: a Wilson Fish funded program and the State Administered Department Social Services program in San Diego. Hohm et al. found that “the refugees with the WF Project achieved higher rates of employment, sooner after arrival, resulting in shorter dependency and lower levels of cash assistance”.⁷¹ Actors in 12 states and one county operate Wilson Fish programs to facilitate refugee resettlement,⁷² and this article argues that Welcome Wyoming should join the list. The Wilson Fish Program accepts applications for funding every five years, the next cycle renewing in 2020.⁷³ Welcome Wyoming could be a clear candidate for Wilson Fish grant consideration, clearly meeting the criteria established in the ORR’s Wilson Fish Calls for Application:

ORR will consider proposals from existing Wilson/Fish grantees that propose to continue to serve refugees under Wilson/Fish authority and from new applicants that have not previously operated a Wilson/Fish program that

⁷⁰ ORR, “*Annual Report to Congress*”

⁷¹ Charles Hohm et al., “*A Quantitative Comparison*”

⁷² Pritchett, “*Refugee Federalism in Wyoming*”

⁷³ Dee Daniels Scriven

propose to either (a) establish or maintain a refugee program in a State where the State is not participating in the refugee program or is withdrawing from the refugee program or a portion of the program; or (b) provide an alternative to the existing system of assistance and services to refugees.⁷⁴

Welcome Wyoming must take note of an interesting development in the ORR should it look to resettle refugees through the Wilson Fish Program: the Wilson Fish Program has undergone significant stresses over the last several years and may be subject to change. The Wilson Fish Program guidelines provide that when a state program (State Administered or PPP) withdraws from the national RRP, the agencies that resettled refugees under the purview of the state program are authorized to seek funding through the Wilson Fish program.^{75 76 77} The ORR has unofficially dubbed such cases “Replacement Designees”, and states’ recent trend of withdrawing from the national RRP has saddled the Wilson Fish Program with Replacement Designee funding dependency.⁷⁸ The ORR may have to restructure or adjust the Wilson Fish Program in order to meet the growing needs of local resettlement agencies that are left without state support.

iii. Reception and Placement Program (RPP)

This and the following subsection will outline the entire Refugee Resettlement Program (both the RPP and the RTP), contextualizing the roles of the various models and actors described in the previous sections. See Figure II again for reference:

Figure II: Map of RPP and RTP

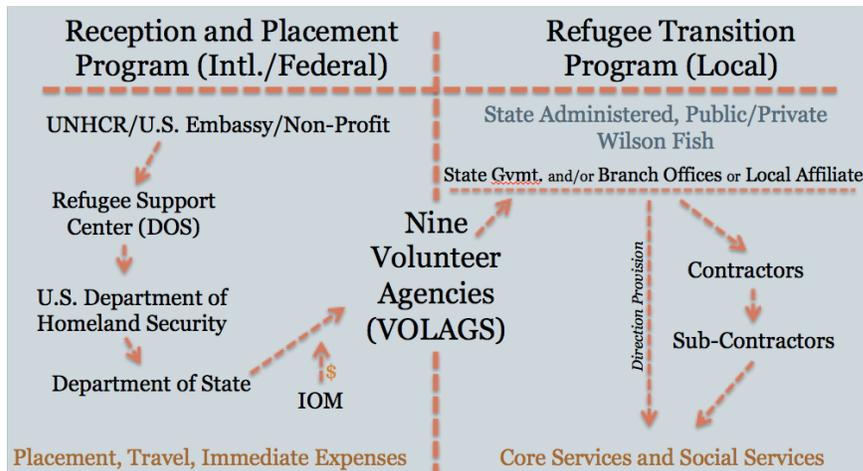
⁷⁴ ORR, “Funding Opportunity Announcement”

⁷⁵ Ibid.

⁷⁶ ORR, “Wilson Fish Program Guidelines”

⁷⁷ Dee Daniels Scriven

⁷⁸ Ibid.



The RPP effectively begins with the designation of refugee status. The U.S. has long been sympathetic to the plight of refugees and has passed several pieces of legislation establishing a statutory basis for admitting refugees, including the Immigration and Nationality Act Amendments of 1975 and the Refugee Act of 1980.⁷⁹ The Immigration and Nationality Act provides the domestic definition of a refugee that effectively mirrors the definition agreed upon at the United Nations Convention Relating to the Status of Refugees in 1968:

Any person who is outside any country of such person's nationality or, in the case of a person having no nationality, is outside any 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 on account of race, religion, nationality, membership in a particular social group, or political opinion.⁸⁰

Three “durable solutions” exist for a refugee designee: voluntary repatriation, integration, and resettlement.⁸¹ The decision as to which option will allow the refugee to live “in dignity and peace” bears nexus to the preferences of the refugee,

⁷⁹ Pritchett, *Refugee Federalism in Wyoming*

⁸⁰ Immigration and Nationality Act

⁸¹ Pritchett, *Refugee Federalism in Wyoming*

the state government, and the UNHCR alike.⁸² ⁸³ As Suzie Pritchett notes, “of the over 15 million refugees encountered by the UNHCR around the world by the end of 2015, less than one percent of those refugees were resettled in third countries”.⁸⁴

Once the refugee receives official designation by the UNHCR, a qualified non-profit, or a U.S. Embassy, the refugee may be referred to the U.S. for third party resettlement.⁸⁵ The case will first be processed by one of the nine PRM-managed Refugee Support Centers (RSC) worldwide, after which the RSCs prepare qualified applications for refugee admission to the U.S. government for consideration.⁸⁶ Working in tandem with nonprofits, governments, embassies, and the UNCHR, the RSCs collect data on the refugee to submit to the Department of Homeland Security’s U.S. Citizen and Immigration Services (USCIS). USCIS conducts an extensive background check and an in-person interview before rendering a decision on the refugee’s application for third country resettlement in the U.S.⁸⁷ Refugees are also subject to a medical screening and must submit biometric data prior to admission. Furthermore, before offering admission, USCIS must have preliminary assurance that a VOLAG can manage the resettlement case.⁸⁸

If the refugee meets all qualifying factors and is not barred from resettlement, the s/he will likely undergo a cultural orientation course, both to address anxieties associated with culture shock and to better facilitate integration.

⁸² UNHCR, *“Finding Durable Solutions”*

⁸³ Pritchett, *“Refugee Federalism in Wyoming”*

⁸⁴ *Ibid.*

⁸⁵ U.S. Department of State, *“Refugee Admissions Program”*

⁸⁶ *Ibid.*

⁸⁷ *Ibid.*

⁸⁸ *Ibid.*

The International Organization for Migration (IOM) then provides an interest-free loan to the refugee for the cost of airfare, which the refugee is required to repay when they are established in the U.S.⁸⁹ Upon arrival, family members, a representative of the state, or a worker at the local resettlement agency (VOLAG branch office or local affiliate) will meet the refugee and accompany them to their new home.⁹⁰ The Department of State provides a per capita grant of \$2,125.00 per refugee to the VOLAG responsible for resettlement, \$1,225.00 of which must be used for direct refugee support, whereas the remaining \$1,000.00 may be used for administrative purposes.⁹¹ The VOLAG then channels this funding to the local resettlement agency where employees and volunteers coordinate housing and pay the down payment, fund at least the first thirty days of rent, furnish the apartment, buy groceries, and pay other miscellaneous one-off fees.⁹² This is the final phase of the RPP, marking the beginning of the RTP.

iv. Refugee Transition Program (RTP)

The RTP is characterized by the provision of the core and social services that have been discussed throughout this article, a comprehensive list of which may be found below:

- **Cash Assistance**
- **Medical Assistance**
- **Child Education Services**
- **Employment services** (self-sufficiency plans, individual employability plans, world-of-work and job orientation, job clubs, job workshops, job development, referral to job opportunities, job search and job placement and follow-up)

⁸⁹ Department of State, *"Reception and Placement Program"*

⁹⁰ Co Resource Exchange, *"U.S. Refugee Admissions Program"*

⁹¹ Jonathan Owen

⁹² James Xi, *"Refugee Resettlement Federalism"*

- **English Language Instruction**
- **Case Management Services**
- **Translation and Interpretation Services**
- **Child Welfare Services**
- **Employability Assessment Services** (aptitude and skills testing)
- **On the Job Training**
- **Vocational training** (driver education and other trainings apart of the individual employment plan)
- **Skills Recertification**
- **Day care for children**
- **Transportation Services**
- **Information and Referral Services**
- **Outreach services** (including activities designed to familiarize refugees with available services, to explain the purpose of these services, and facilitate access to these services)
- **Social Adjustment Services** (Emergency, Cultural, Health related, Home management)
- **Citizen and Naturalization Preparation Services**^{93 94}

The first two services are considered core services, whereas the remaining enumerations are considered social services. RTPs are highly varied from state to state – even from locality to locality – and can incorporate any number of the services listed above; however, a typical RTP will most always offer those above that are underlined. Cash assistance, medical assistance, child education, employment services, English instruction, case management, and interpretation/translation services are considered fundamental to the U.S. Government’s stated objective of encouraging “employment and economic self-sufficiency as quickly as possible”.⁹⁵ Generally, these services are offered at the nexus of state and private efforts. Even when states officially absolve themselves from the national resettlement program, local resettlement agencies rely on close cooperation with local governments to

⁹³ Code of Federal Regulations

⁹⁴ ORR, “Wilson Fish Program Guidelines”

⁹⁵ Code of Federal Regulations

provide core and social services. For example, refugees are legal residents in the U.S., evoking state responsibility to provide primary and secondary public schooling for refugees and their children.

The provision of the enumerated services is a highly flexible and adaptable process based on the model of resettlement to which a state subscribes. State administered programs may elect to distribute Cash and Medical Assistance through local public assistance offices such as the Department of Family Services, meanwhile contracting out English learning services to private organizations.⁹⁶ On the other hand, a Wilson Fish state may opt to centralize the provision of core and social services into a “one stop shop” model, as is preferred by the ORR with Wilson Fish programs.⁹⁷ In such a model, a VOLAG’s branch office or the local affiliate might operate an office that distributes CMA, coordinates outreach services, teaches English, provides case management, and conducts job placement- all in house. In the end, the provisional channels are determined by the availability of local resources (both public and private), the local resettlement agency, the parent VOLAG, the ORR, and the state- depending on the level to which the state participates in the RPP/RTP.

v. How a Local Refugee Resettlement Program Begins

This final subsection offers a guide to local organizations looking to navigate the statutory complex of the national RRP to welcome refugees into their community. The three fundamental questions such an organization must address in the process of establishing a resettlement program are as follows:

1. Is my community suitable for refugee resettlement?

⁹⁶ Jan Parks

⁹⁷ ORR, “Wilson Fish Program Guidelines”

2. Which model of local resettlement will our organization pursue? (local affiliate vs. branch office)
3. Where will our funding come from? (Wilson Fish vs. PPP/State Administered)

As demonstrated in Figure II (Map of RPP and RTP), the VOLAGS are central to the process of resettlement; federally funded refugee resettlement *cannot* occur without a VOLAG's commitment to a locality.⁹⁸ The ORR notes:

No grant or contract may be awarded under this section unless an appropriate proposal and application (including a description of the agency's ability to perform the services specified in the proposal) are submitted to, and approved by, the appropriate administering official. Grants and contracts under this section shall be made to those agencies which the appropriate administering official determines can best perform the services.⁹⁹

An organization aspiring to welcome refugees must therefore prioritize bringing one of the nine VOLAGS into the community, either by way of a branch office or a local affiliate. In either case, a candidate VOLAG will need assurance that the welcoming community is suitable for refugee resettlement. When a VOLAG conducts a preliminary scan of a candidate welcoming community, it looks for a variety of factors including sufficient public transportation, available jobs (low skill labor and entry level positions) good housing stock, schools with sufficient resources, English as a Second Language programs, and a diverse population that can help with interpretive services.¹⁰⁰ Dee Daniels Scriven indicates that the *most* important considerations are the availabilities of affordable housing, employment opportunities, and medical services.¹⁰¹

⁹⁸ Dee Daniels Scriven

⁹⁹ ORR, "*Funding Opportunity Announcement*"

¹⁰⁰ Dee Daniels Scriven

¹⁰¹ Ibid.

Ultimately, the Department of State has the final say on the viability of a local resettlement program. Therefore, if a VOLAG determines that a given locality is viable for resettlement, the VOLAG must then submit an abstract to the Department of State pursuant to their cooperative agreement, indicating that it wishes to expand its local resettlement agency network.¹⁰² In this abstract, the VOLAG submits a plan detailing the capacities for refugee resettlement offered by the candidate welcoming community.¹⁰³ The Code of Federal Regulations has established a series of criteria that outline the necessary components for a contender locality and the content of a resettlement plan, the most significant of which are mentioned below:

- Designation of the resettlement agency and the functions responsible for developing, administering, and supervising the administration of a resettlement plan
- How the resettlement plan will coordinate Cash and Medical Assistance and other support services to “encourage effective resettlement and promote employment and economic self-sufficiency as quickly as possible”
- Describe how the resettlement agency will make available language training and employment services to refugees
- How the resettlement agency will encourage refugees to register for employment services
- Identify an individual who can serve as the state resettlement coordinator
- How the resettlement agency will provide care/supervision/guardianship under state law for unaccompanied refugee children
- How the resettlement services (all core and social services) will be applied “without regard to race, religion, nationality, sex, or political opinion”
- How the resettlement will meet with various stakeholders and community members involved in refugee resettlement on a quarterly basis (at a minimum)
- Identify methods for informing staff of the policies, standards, procedures, and instructions of the resettlement agency
- Systematic examination and evaluation of all office operations¹⁰⁴

¹⁰² Ibid.

¹⁰³ Mary Poole

¹⁰⁴ Code of Federal Regulations

If attempting to resettle refugees in a given locality, VOLAGS will look to gather all the information mentioned above, which forms the basis of the abstract required by the Department of State. The research for this abstract involves significant information sharing between the resettlement agency and the welcoming community. Mary Poole of Soft Landing Missoula indicated that in the end, it is the responsibility of the resettlement agency to gather information for the abstract; Soft Landing Missoula's main role in the process was to garner community support.¹⁰⁵ If the Department of State approves the proposal, the welcoming community is officially eligible for direct resettlement through the parent/affiliate VOLAG. The reader should note that process described above is tailored to the Wilson Fish approach to developing an RRP. Should a state decide to join the national RRP, the state would need submit a plan/abstract to the federal government addressing the exact concerns listed above outlined in the Code of Federal Regulations.¹⁰⁶

The second and third questions that organizations looking to invite refugee resettlement must answer may be addressed together. Choosing the appropriate local resettlement model (local affiliate vs. branch resettlement) and channeling RPP/RTP funding (Wilson Fish vs. PPP/State Administered) is largely determined by the extant regulatory framework for resettlement, or lack thereof. If the locality under review exists in a state that already has a resettlement program filed with the federal government, the state will likely already have a regulatory framework for the channeling of RTP monies: While local resettlement agencies operating in a State

¹⁰⁵ Mary Poole

¹⁰⁶ Code of Federal Regulations

Administered/PPP system can still secure social service funding through the Wilson Fish program,¹⁰⁷ the path to developing a new local resettlement agency will be a relatively straightforward process. However, if the host state has withdrawn from the national RRP, or if it never subscribed to the national RRP to begin with (such as Wyoming), the local NGO has two options: 1) the local NGO can work with the state to *(re)create* a State Administered/PPP, or 2) the local NGO can pursue a resettlement program through the Wilson Fish model. Disassociation of states from the national RRP is purposeful, indicating that choosing the first option will be a challenging process wrought with political and administrative opposition.

The question of selecting the appropriate relationship with the parent VOLAG (branch resettlement vs. local affiliate) ultimately comes down to the dialogue between the local welcoming NGO and the VOLAG.¹⁰⁸ As previously noted in this article, some VOLAGS refuse to enter affiliate relationships with local NGOs, whereas others invite the opportunity. The local NGO must decide which system is circumstantially practical, after which it must reach out to the appropriate VOLAGS that can provide the desired arrangement. The local NGO must consider several factors when determining the model that best fits their community. Mary Poole of Soft Landing Missoula cautions NGOs of the heavy workload under a local affiliate relationship.¹⁰⁹ As discussed previously in this article, in a local affiliate model, the local NGO *becomes* the local resettlement agency, merely operating under the conditions established in the memorandum of understanding between the affiliate

¹⁰⁷ ORR, “*Funding Opportunity Announcement*”

¹⁰⁸ Mary Poole

¹⁰⁹ Ibid.

and the VOLAG. Not only would the local affiliate (likely) be tasked with the administering CMA monies, but it would also be responsible for the coordination and provision of social resettlement services, either directly or by subcontracting the work. This is a substantial undertaking that requires high levels of commitment by volunteers and employees alike.

On the other hand, Zeze Rwasama, director of the College of Southern Idaho Refugee Program (local affiliate of VOLAG: USCRI) strongly encourages local NGOs to pursue an affiliate program.¹¹⁰ According to Mr. Rwasama, establishing credibility in the local resettlement agency is critically important. When a branch office of a parent VOLAG opens in a community to resettle refugees, community members may become suspicious of the “outsider’s” intent. Operating a resettlement agency within pre-existing community structures (such as NGO local affiliates) helps to abate suspicion, rally community support, and establish credibility.¹¹¹

Another point of consideration in determining the practicality of a local affiliate model vs. a branch office relates to the VOLAG’s willingness to invest in a community. The provision of federally funded RTP/RPP services is impossible without a VOLAG, thus the local NGO hoping to welcome refugees *must* present a viable case when it first reaches out to the VOLAGS. For the VOLAGS, opening a branch office is a significant fiscal and administrative undertaking. Directly employing administrators and service providers, paired with opening an office and cultivating community rapport, requires substantial investment. A local affiliate

¹¹⁰ Zeze Rwasama

¹¹¹ Ibid.

model eliminates many of these concerns for the candidate VOLAGS.¹¹² VOLAGS may therefore be *more* willing to develop a local resettlement agency via the local affiliate model than a branch office.

6. RECOMMENDATION AND CONCLUSION

Securing VOLAG commitment in the state of Wyoming is the most important step for Welcome Wyoming. Without a VOLAG, resettlement cannot take place. This conclusion therefore recommends that Welcome Wyoming pursue a local affiliate relationship with one of the 9 VOLAGS. Welcome Wyoming should then work to join the Wilson Fish program, thereby establishing a funding source for core and social resettlement services. Given the decline in domestic refugee admissions, VOLAGS are much less willing to expand operations and invest in new resettlement programs. In fact, under the instruction of the Department of State, many have shut down field offices that cannot resettle more than 100 refugees annually.¹¹³ If Wyoming is to convince a VOLAG to resettle refugees in the state of Wyoming, the offer must be attractive to the VOLAG, meaning minimal incurred financial risk/investment. The logical choice, therefore, is a local affiliate relationship paired with a willingness to apply for local resettlement funds through the Wilson Fish program. While this option requires more work on the part of Welcome Wyoming, the Wilson Fish CMA grants pay for administrative costs, meaning that Welcome Wyoming could afford to employ workers. Jeffery Kirk published a book titled

¹¹² Ibid.

¹¹³ Ibid.

Refugee Resettlement: One million to 1, which serves as an ideal step-by-step of how to provide effective support services to refugees as a local affiliate model.¹¹⁴ This manual would serve as an effective guide for Welcome Wyoming.

If Welcome Wyoming elects to pursue a local affiliate relationship with a VOLAG, it will need to rally community support. Across the board, the interviewees emphasized the importance of community support (the police chief, the mayor, the city council, church groups, local businesses, local health officials... etc.)¹¹⁵ Though the federal government can *legally* resettle refugees without regard to state opinion, VOLAGS will only expand their network of resettlement agencies in localities with demonstrable community support.¹¹⁶ Furthermore, without community support the ORR is unlikely to approve Wilson Fish grant proposals.¹¹⁷ Zeze Rwasama shared that the most effective way to convey community support is a Welcoming City Resolution, announced by the city council or another such appropriate authority.¹¹⁸ Welcome Wyoming will then need to methodically address the list of considerations outlined in subsection IV of this article in order to encourage VOLAG commitment and eventual refugee resettlement.

Refugee resettlement is politically charged, legally complex and administratively challenging. Above all else, however, it is the right thing to do. The days of isolationism – of retreat to socioeconomic confines delineated by artificial, national borders – are of the past. Global challenges such as war, famine, and climate

¹¹⁴ Jeff Kirk

¹¹⁵ Mary Poole

¹¹⁶ Dee Daniels Scriven

¹¹⁷ ORR, “*Funding Opportunity Announcement*”

¹¹⁸ Zeze Rwasama

change demand cooperative global engagement, and the fallout requires global solutions. The Universal Declaration of Human Rights, the UN Convention Relating to the Status of Refugees, the Refugee Resettlement Act of 1980, and the myriad other bodies of text relating to human rights offer a framework by which the global community may confront the challenges of the day. It is high time that Wyoming joins the global community and helps shoulder the responsibility to protect human rights, providing an option for safe, reliable, and productive refugee resettlement.

7. Questions for Interviewees

- Can you please discuss/describe the meetings between the PRM and the 9 VOLAGS during the Reception and Placement phase? How do the two groups decide where to send the refugees (if there is no family previously settled)? How much control does each group have in the decision?
- “Each agency headquarters (one of the 9 VOLAGS) maintains contact with its local affiliated agencies to monitor the resources (e.g., interpreters who speak various languages, the size and special features of available housing, the availability of schools with special services, medical care, English classes, employment services, etc.) that each affiliate’s community can offer.” Would you please describe these local affiliated agencies? Can these organizations be previously existing non-profits?
- What is the nature of VOLAGS’ relationship with community organizations? What does a “local service provider” of one of the 9 national resettlement agencies look like? Can it be an agreement between them and another non-profit?
- Can you please discuss the difference between state-administered programs and the public-private partnership model? In both cases, it seems as if voluntary agencies are responsible for providing services. How do they differ?
- How does a Wilson Fish-based resettlement program typically start? What kind of resettlement infrastructure is important?

- What does the document look like that a private organization files with the Wilson Fish Program? Does the document look like the document that states submit to the ORR (outlined in the Code of Federal Regulations)? Does the public have access to these documents?
- Is an organization that resettles refugees through the Wilson Fish program eligible to receive social services grants such as the Refugee Family Child Care Microenterprise Program, the Preferred Communities Program, the Refugee School Impact Program... etc.?
- ORR provides funding to ethnic community-based organizations (ECBOs), non-profit agencies, and resettlement agencies for additional specialized programs that further promote employment, economic development, and integration. Is it necessary to be one of the 9 VOLAGS to receive these grants?
- What types of organizations are eligible to receive funds through the Wilson Fish program? Does it have to be one of the 9 voluntary agencies?
- It seems to me that there are two parts of resettlement/integration- the Reception and Placement Program that takes place via the 9 VOLAGS and the Department of State, and then the longer-term assistance that takes place through the ORR (CMA, grants... etc.). Is this correct? Must ORR monies be channeled through one of the 9 VOLAGS, or are other organizations eligible for various program funds as well?
- Can the one-time amount of money given to VOLAGS per refugee resettled be given directly to the refugee, a county, or a state agency?
- Can a refugee be resettled without the participation of one of the 9 VOLAGS? In a state administered model, does the PRM have to rely on the VOLAGS, or can a state agency/county take over those functions?
- How are the 9 VOLAGs connected to NGOs groups? Idaho, for example, has the Mountain States Group. What does it look like when a state has a Wilson Fish Program but is not withdrawn, or is partially withdrawn? At that point, what is the difference between Wilson Fish and the traditional PPP model?
- What do you know about the county-based Wilson Fish program in San Diego?
- What recommendations do you have for the group going forward trying to establish a resettlement program?

- What kinds of things would the ORR/VOLAGS look for in a community to begin resettling refugees in an area? What kind of work can be done that would be enticing to a VOLAG?
- Do you have any further information/thoughts that you would like to share?

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