

**County of Orange Social Services Agency  
Family Self-Sufficiency & Adult Services Division**

**Program/Area:** Refugee Cash Assistance  
**Title:** RCA Work Registration and Employment Participation  
**Number:** 800 – R2 **Status:** Revised  
**Effective Date:** 4/19/2012 **Revision Date:** 2/6/2026  
**Approved:** Signature on file

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**PURPOSE** This policy provides guidance for Refugee Social Services/Refugee Employment Services (RSS/RES) registration and activities for non-exempt Refugee Cash Assistance (RCA) and Trafficking and Crime Victims Assistance Program Cash Aid (TCVAP CA) recipients.

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**POLICY** RCA/TCVAP CA eligibility date to benefits is driven by the individual's specific immigration status. Refer to the Policy 800-R1 – Refugee Cash Assistance and Policy 800-R3 – Trafficking and Crime Victims Assistance Program (TCVAP) for more information.

As a condition of receiving RCA/TCVAP CA benefits, non-exempt individuals must register with an agency providing RSS/RES within **30 days** of receiving RCA/TCVAP CA and must actively participate in assigned employment related activities.

Employment related services may be provided for up to **60 months** from the individual's RCA/TCVAP CA eligibility date, regardless of whether the individual is still receiving RCA/TCVAP CA benefits. These services may include continued support after initial job placement, to assist with job retention and career advancement.

The goal of the Refugee Social Services/Refugee Employment Services (RSS/RES) program is to support RCA/TCVAP CA recipients in achieving economic self-sufficiency as quickly as possible through targeted, employment-focused services.

Failure to register for or participate in required RSS/RES activities, without good cause, may result in a reduction, suspension, or termination of RCA/TCVAP CA benefits.

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- BOOKMARKS**
- [RSS/RES Eligible Populations](#)
  - [RSS/RES Program Elements](#)
  - [Family Self-Sufficiency Plan \(FSSP\)](#)
  - [Participation Requirements](#)
  - [Employment Services Registration Process](#)

- [RSS/RES Exemptions](#)
- [Medical Exemption Evaluation](#)
- [Compliance Process](#)
- [Good Cause Determination](#)
- [Good Cause Reasons](#)
- [Compliance Plan](#)
- [Sanction](#)
- [Curing Process for Unsuccessful Compliance Plan](#)
- [Ongoing Communication](#)
- [References](#)
- [Attachments](#)

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**RSS/RES  
ELIGIBLE  
POPULATIONS**

The following RCA/TCVAP CA populations are eligible for RSS/RES:

**Refugees:** May be eligible for RSS/RES for 60 months beginning the date of U.S. entry.

**Asylees:** May be eligible for RSS/RES for 60 months from the date asylum is granted.

**Cuban and Haitian Entrants:** May be eligible for RSS/RES for 60 months from the date they became eligible for Federal Office of Refugee Resettlement (ORR) assistance and services as a Cuban/Haitian entrant.

Note: They are ineligible for benefits if there is a final, non-appealable, legally enforcing order of removal, deportation, or exclusion.

**Certain Amerasians from Vietnam:** May be eligible for RSS/RES for 60 months beginning the date of U.S. entry.

**Trafficking and Crime Victims:** May be eligible for 60 months of RSS/RES. See Policy 800-R3 – Trafficking and Crime Victims Assistance program (TCVAP) for more information on eligibility.

**Iraq/Afghan Special Immigrant Visa holders (SIV):** May be eligible for RSS/RES for 60 months beginning the date of U.S. entry.

**Individuals Under 18 years of age:** Certain minors under the age of 18 (i.e. Refugees, Asylees, Cuban/Haitian Entrants, etc.) are eligible to participate in RSS/RES. Individuals who are 16 years of age or older and not full-time students in elementary or secondary school are generally eligible.

Note: Students may be provided with employment services and employability assessment services to obtain part-time or temporary employment, such as a summer job while a student, or full-time permanent employment upon completion of schooling.

## **Humanitarian Parolees (When Authorized by Congress):**

Certain parolee populations may be eligible for RSS/RES services as determined by Congressional authorization

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### **RSS/RES PROGRAM ELEMENTS**

Orange County contracts with **Access California Services (AccessCal)** to deliver RSS/RES to eligible clients.

AccessCal administers the following core components of the RSS/RES program:

- **Employment Services:**

Includes the development of employability and Family Self-Sufficiency Plans (FSSPs), client orientation, employment readiness workshops, job development, job search assistance, job placement and follow-up, job referrals, and support for barrier removal.

- **Employability Assessment Services:**

Involves evaluating clients' skills and aptitudes to determine appropriate employment and training pathways.

- **On-the-Job Training (OJT):**

Provides opportunities for clients to gain work experience while earning wages in structured training settings

- **English Language Instructions/Vocational English as a Second Language (VESL):**

Focuses on improving English language proficiency, particularly as it relates to the workplace.

- **Vocational Training:**

Offers occupational training aligned with in-demand careers and the client's employment goals

- **Skill Recertification:**

Supports clients in obtaining necessary licensure or certification to resume practicing their profession in the U.S.

- **Short-Term Skills Training:**

Provides targeted, time-limited training in specific skills needed for immediate employment opportunities.

- **Other services may include:**

- Information and referral services
- Outreach
- Social adjustment assistance
- Case management
- Citizenship and naturalization preparation

- Services tailored for older refugees

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## **FAMILY SELF-SUFFICIENCY PLAN (FSSP)**

A Family Self-Sufficiency Plan (FSSP) will be developed by AccessCal for each participant engaged in employment-related services under the RSS/RES program.

The FSSP is created collaboratively between the participant and AccessCal staff to assess and address the needs of both the individual and their family, from arrival through the achievement of economic self-sufficiency. It serves as both a planning and monitoring tool throughout the individual's participation in RSS/RES services.

The FSSP includes, but is not limited to:

- The income level the family must earn and maintain to achieve self-sufficiency.
- A strategy and timeline for attaining the target family income.
- Employability plans for each employable family member, including all individuals over the age of 16.
- Identification of short-term and long-term goals, with at least one primary goal specified for each family member.
- Referrals to both federally funded (ORR) and non-ORR funded services to support progress toward identified goals.
- A coordinated approach to simultaneously address the employment potential of all adult wage earners in the household.
- A plan to address social service needs and barriers (e.g., childcare, transportation, mental health, housing) that may hinder self-sufficiency.
- Follow-up assessments of family progress at 6-month and 12-month intervals, with adjustments to the plan as needed.

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## **PARTICIPATION REQUIREMENTS**

Participation in RSS/RES focuses primarily on preparing the participant to enter or re-enter the workforce and supporting them in obtaining and retaining employment that leads to long-term self-sufficiency and attain economic independence.

A non-exempt participant is required to:

- Register and participate in RSS/RES activities within **30 days** of RCA/TCVAP CA approval, unless exempt or granted a good cause exemption, with AccessCal for employment services.
- Accept referrals to employment interviews and bona fide offers of employment unless the client is participating in on-the-job training or vocational training as part of an approved employability plan.
- Engage in employment-directed services even if currently employed part-time, provided that these services do not interfere with the participant's job.
- Maintain active participation in the RSS/RES activities for the duration of their RCA/TCVAP CA eligibility period.

## **Exception for Part-Time Employment:**

Participants employed fewer than 32 hours per week are required to engage in additional Employment Services activities to continue progressing toward full self-sufficiency. These activities must not interfere with the participants current employment. Part-time employed participants will receive job counseling and job search assistance concurrently with their employment.

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### **EMPLOYMENT SERVICES REGISTRATION PROCESS**

During the initial county interview with each non-exempt work applicant, the Intake Worker will:

- Explain registration requirements using the RS 36 Employment and Training Requirements for Refugee Cash Assistance (RCA) form and obtain a signature for each mandatory applicant.
  - When applicable, document on the RS 36 Employment and Training Requirements for Refugee Cash Assistance (RCA) form, and complete a Journal entry in CalSAWS, that the appropriate translations were made.
- Provide the signed original copy of the completed RS 36 Employment and Training Requirements for Refugee Cash Assistance (RCA) form to the RCA applicant.
- Refer the applicant to AccessCal using the RS 3 Service Provider Referral/Notification Form found in Electronic Forms Management System (EFMS). Complete all applicable sections of the referral and submit via email to [refugee@accesscal.org](mailto:refugee@accesscal.org). If the ABCDM 228 Applicant's Authorization for Release of Information form is completed, include with the email copies of immigration related document(s) provided by the applicant.
  - Staff may reference the RS 3 Completed Service Provider, Referral/Notification form Example as a guide.
- Provide a copy of the RS 3 Service Provider Referral/Notification Form to the applicant.
- Image copies of all documents into Hyland Perceptive Experience (HPE).

Note: To share immigration related documents with AccessCal, the client must complete a ABCDM 228 Applicant's Authorized for Release of Information form.

Staff will call AccessCal to schedule an appointment, complete the RS 3 Service Provider Referral/Notification form with appointment information, email the form to AccessCal, and provide the applicant with a copy of the referral.

For applicants whose appointment are unable to be scheduled while in the office, staff will complete the RS 3 Service Provider Referral/Notification Form and email the form to AccessCal for enrollment and a copy provided to the client.

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### **RSS/RES EXEMPTIONS**

RCA/TCVAP CA applicants and recipients can request a work program exemption at any time to AccessCal and/or the county eligibility worker, verbally or in writing.

When an individual is determined to be exempt, they are not required to participate in RSS/RES as a condition of eligibility for cash aid.

Exemptions may be granted for the following reasons:

- Under 16 years of age
- Age 60 or older
- 16 or 17 years of age and a full-time student as defined in CalWORKs (CW) regulations.
- A person 18 years of age who is a full-time student in a secondary school (12<sup>th</sup> grade or below) or in an equivalent level of vocations or technical training, if the person is expected to complete the 12<sup>th</sup> grade or the training program prior to their 19<sup>th</sup> birthday.
- At least 16 but not yet 18 years of age and participating full-time in vocational or technical school or training as defined in CW regulation considered appropriate by the county welfare department (CWD).
- A person who is ill or injured when their illness or injury is verified by a physician's written statement that the illness or injury is serious enough to temporarily prevent entry into employment or an employment-directed education/training program.
- A person who is incapacitated when it is determined that the physical or mental impairment, by itself or in conjunction with age, prevents the individual from engaging in employment or participating in an employment-directed education/training program.
- A person whose presence in the home is required on a substantially continuous basis because of the condition of another member in the household, when verified by a physician's written statement.
- The parent or caretaker relative of a child under six (6) months of age who is personally providing full-time care for the child with only very brief and infrequent absence from the child; only one parent or other relative in a case may qualify for this exemption.
- A person working 32 hours a week in unsubsidized employment which is expected to last a minimum of 30 days. This exemption continues to apply if there is a temporary break in full-time employment which is expected to last no longer than ten (10) workdays.
- A woman who is pregnant and provides medical verification that the pregnancy impairs her ability to be regularly employed or participate in employment/training related activities. An exemption based on a medically verified pregnancy may also be granted when the County determines that participation will not readily lead to employment, or that training activity is not appropriate.

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**MEDICAL  
EXEMPTION  
EVALUATION**

When an applicant and/or client discloses having a medical condition that will prevent them from participating in RSS/RES activities, Eligibility staff will:

- Complete the Refugee Cash Assistance Program Exemption Request F063-50-55, print and provide to the client to complete.
- Complete the Refugee Cash Assistance Program Authorization to Release Medical Information Form F063-50-56, print and have the client sign.

- Inform the applicant that a written statement from a physician, health care provider, licensed or certified psychologist may be acceptable, which should include the following:
  - Expected duration of the disability
  - Extent to which the disability impairs employment and/or participation in RSS/RES activities; and
  - Confirmation that the client is actively seeking appropriate medical treatment

An exemption request must be approved or denied in writing within 15 calendar days from receiving the request using the Refugee Cash Assistance Exemption Determination Form F063-50-57.

Once the required documentation to evaluate a pending exemption is received, including disability documentation, staff will determine to approve or deny the exemption and complete the following steps:

- Complete the Refugee Cash Assistance Exemption Determination Form F063-50-57 and mail a copy to the client.
- Complete the RS 18 form and email AccessCal to notify of the outcome of the exemption
- Enter disability information in CalSAWS data collection
- Run EDBC and authorize case as appropriate
- Run Exemptions and complete a CalSAWS Journal entry.
- Image document(s) into HPE

Note: The exemption end date must not extend beyond the RCA/TCVAP CA eligibility end date.

**Exemptions ending prior to RCA/TCVAP CA eligibility period:**

Staff will email a RS 3 form to AccessCal within ten (10) business days of the scheduled expiration date to allow the mandatory participant to register with AccessCal for their ongoing RCA/TCVAP CA eligibility. Provide a copy of the RS 3 to the applicant/recipient.

**COMPLIANCE PROCESS**

The purpose of the compliance process is to give each mandatory RSS/RES participant who has failed or refused to comply with RSS/RES program requirements an opportunity to demonstrate good cause or agree to a Compliance Plan prior to being sanctioned and discontinued from RCA/TCVAP CA. When a participant fails or refuses to participate in RSS/RES requirements, they are considered in Non-Compliance of the regulations.

Failure/refusal to comply with RSS/RES program requirements include:

- Failing to attend an appointment with AccessCal
- Not satisfactorily participating in the assigned RSS/RES activity(ies)
- Not providing verification of satisfactory participation in the assigned RSS/RES activity

- Not continuing/accepting or resigning from employment

AccessCal is responsible for notifying the County when a participant fails to comply with RSS/RES program requirements. Within 10 days of notification the Operation Policy Team (OPT) RCA Designee and Eligibility Staff will follow the Refugee Social Services Employment Program Processing Guide to initiate the compliance process.

**Notification Requirements:**

Upon discovering that the participant failed/refused to comply with RSS/RES, the participant will be provided a notice of action.

**The NOA will provide the following information:**

- Action that caused the problem with the RSS/RES employment participation
- Good Cause Determination appointment date, time and location
- The right to reschedule the appointment within the Compliance Period
- The purpose of the meeting to discuss good cause, exemption, compliance plan
- The financial sanction of removing from the AU if the participant does not meet good cause, exemption, and compliance plan
- Step to restore the benefit after the financial sanction
- The right for legal aid and a fair hearing

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**GOOD CAUSE DETERMINATION**

Good Cause Determination (GCD) is a step within Non-Compliance when a participant is evaluated to be excused from participating in RSS/RES employment services due to Good Cause or an Exemption.

The participant is required to attend the scheduled GCD interview or contact AccessCal or OPT RCA Designee by the end of the compliance period to prevent a sanction. The participant is allowed to reschedule the appointment at least one time as long as it is within the Compliance Period.

On the scheduled GCD interview date, AccessCal will attempt to contact the participant if they missed the interview or failed to contact AccessCal.

AccessCal/OPT RCA Designee will evaluate each situation to determine the length of time good cause is granted, including any extensions.

Whenever possible, AccessCal/OPT RCA Designee will assist the participant with obtaining verifications that supports the Good Cause Determination. There may be situations where the verification is not available, such as when the participant was not feeling well and did not attend the activity for a couple of days but did not see a doctor. AccessCal/OPT RCA Designee may request verification when the reason is questionable.

The participant is not required to verify their statement to receive good cause related to employment violations, nor required to reference any specific law when making the statement.

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**GOOD CAUSE REASONS**

Good Cause will be evaluated on a case-by-case basis including the necessary verifications and the length of time.

Good Cause may be granted for, but not limited to the following reasons:

- The individual was ill or was required to care for an ill member of the Assistance Unit (AU) because no other care arrangements were available; or
- The employment or training was unavailable due to directly to a bona fide strike or lockout; or
- The individual would be required to work for an employer contrary to the conditions of their existing membership in the union; or
- The employment or training site violated applicable health and safety laws and regulations; or
- The employment or training was in excess of the individuals mental or physical capacity; or
- The daily/weekly hours of work exceed those customaries to the occupation; or
- The individual had a definite offer of full-time employment (100 hours or more per month); or
- The individual had unpredictable employment hours or scheduled employment hours exhibiting a pattern of unpredictability (verification required); or
- The individual was prevented from participating or reporting due to physical or mental incapacity and, in alignment with CW regulations, must be documented in writing by a physician or licensed/certified psychologist indicating that participation would impair the individual's physical or mental health; or
- The employment or training violated laws and regulations pertaining to discrimination based on age, sex, race, religion, color, national origin, marital status, political affiliation, or handicap; or
- Their rights under any federal, state, or local labor or employment law were violated; or
- The wage does not meet the federal or state minimum wage; or
- The individual has other substantial or compelling reasons for not meeting or complying with the requirements.
- Excessive commute time from home to the work/training site (not including transporting of a child to/from a childcare facility, if applicable) normally exceeds two hours; or

Note: If a longer commute time is standard for the activity, the commute time is considered acceptable.

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**COMPLIANCE PLAN**

When Good Cause is not found, a compliance plan may be initiated to give the participant an opportunity to correct the participation problem to prevent the sanction. The participant is required to agree to a compliance plan, and it is developed with the participant's collaboration. If the participant agrees to a

compliance plan and subsequently completes the plan, the sanction will not be imposed.

The participant is required to agree to a compliance plan by the end of the Compliance Period to prevent the sanction. The participant is required to satisfactorily participate in the agreed upon activity(ies) for the duration of the activity(ies) or up to 30-calendar days from the date they begin the requirements listed on the plan, whichever is less.

The participant will be referred to the original activity(ies) that was failed or they refused to comply with. If the activity(ies) is no longer available or appropriate, a new activity(ies) will be assigned. The participant will be informed of the compliance plan requirements including:

- Each assigned activity
- Begin and end date for each activity
- Provider name(s) and phone number for each activity
- Location(s) for each activity
- Required participation hours and schedule

If a participant agrees to a compliance plan but at any time during the compliance process fails to complete it without good cause, the sanction will be imposed without further compliance procedures. The participant will be notified of the failed compliance plan via a Notice of Action.

During the compliance period, AccessCal monitors the participants compliance.

Refer to the RCA RSS/RES Non-Compliance Processing Guide for more information.

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## **SANCTION**

A sanction is imposed any time the participant fails or refuses to comply with RSS/RES requirements without good cause and efforts to resolve the participation problem through the compliance process.

A sanction will be imposed when the participant:

- Fails to attend the Good Cause Determination Interview or contact AccessCal/OPT RCA Designee by the end of the Compliance Period, and AccessCal/OPT Designee is unable to make contact, or
- Does not have good cause for not participating in RSS/RES as required and refused to agree to a compliance plan, or
- Agrees to a compliance plan but fails to complete it without good cause.

A participant is considered RSS/RES sanctioned immediately following the end of the Compliance Period, regardless of whether the financial sanction has been imposed. The financial sanction becomes effective on the first day of the first month that the participant can be removed from the AU following timely ten (10) calendar days notification.

When a sanction is in effect, the cash grant is reduced by removing the non-exempt participant from the AU. This may result in an entire case closure. The sanction will be in effect for three (3) payment months in the first instance and six (6) payment months in the subsequent instances.

Refer to the RCA RSS/RES Non-Compliance Processing Guide for more information.

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**CURING  
PROCESS FOR  
UNSUCCESSFUL  
COMPLIANCE  
PLAN**

Curing a sanction is the step when the participant request to cure or stop the sanction through a curing plan.

AccessCal staff will monitor participation in the curing activity until completed or up to 30 days from the date the participant agrees to the curing plan.

Sanctions remain in effect for three (3) payment months in the first instance and six (6) payment months in the subsequent instances. Participants may complete the curing requirements; however, aid cannot be restored until both conditions are met:

- The participant satisfactorily completes the curing plan, and
- The minimum sanction period has ended.

Once both requirements are met, aid may be restored effective the first day of the month following the end of the sanction period.

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**ONGOING  
COMMUNICATION**

Once the RS 3 Service Provider Referral/Notification Form has been received back from AccessCal confirming enrollment, staff would not be responsible for assigning employment services activities. Ongoing RSS/RES activity planning and participation monitoring will be managed by AccessCal.

Staff may coordinate with AccessCal at [refugee@accesscal.org](mailto:refugee@accesscal.org) with requests for assistance with supportive service needs per a client's request.

**Communication Forms:**

- The RS 3A Client Tracking form: Used by AccessCal to report changes in the residence, health, employment, and non-compliance or cooperation status of all mandatory RSS/RES participations to eligibility staff in a timely manner. A new RS 3A Client Tracking form will be completed for each reported change/update.
- The RS 18 Refugee Services – Information Transmittal form is used by eligibility staff or the OPT RCA Designee to advise AccessCal of the change in status of the mandatory RSS/RES participant.

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**REFERENCES**

EAS Manual Sections: 42-712, 69-207, 69-208, 69-609  
All County Letter (ACL): 01-58, 02-28, 04-38, 05-08, 07-45, 23-30  
All County Information Notice (ACIN): I-24-02, I-07-15, I-20-23

Refugee Coordinator Letter: 06-03  
Office of Refugee Resettlement (ORR) State Letter: 00-23  
CFR §422.104  
Policy 800-R1 – Refugee Cash Assistance  
Policy 800-R3 – Trafficking and Crime Victims Assistance Program (TCVAP)

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**ATTACHMENTS**

- RS 3 Completed Service Provider, Referral/Notification Form Example
- RS 3 A Client Tracking
- RS 18 Refugee Services Information Transmittal

CalSAWS Repository Forms:

- RS 3 Service Provider Referral Notification Form
- RS 36 Employment and Training Requirements for Refugee Cash Assistance (RCA)