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# THE REFUGEE SCHOOL IMPACT PROGRAM

AN ANALYSIS OF STATE AND LOCAL PRACTICES

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# THE REFUGEE SCHOOL IMPACT PROGRAM: AN ANALYSIS OF STATE AND LOCAL PRACTICES

## EXECUTIVE SUMMARY

This report is a summary of interviews with 38 states about their Refugee School Impact (RSI) program. This project was initiated by the Kentucky Office for Refugees and additionally supported by the Ohio Refugee Services Program. Both states sought information on how to best manage their RSI program and requested information on promising practices in other states. Interviews were conducted with State Refugee Coordinators and occasionally, with others who manage the funds in their state.

### Section 1: Overview of Types of Agencies & Program Models

At the local level, RSI-funded programs are in refugee agencies, school districts, community based organizations (CBOs), and occasionally other types of organizations. Before this survey, there was no information available on how many local organizations are funded with RSI dollars, nor how many of each type of organization. Furthermore, the funds “trickle down” from the state to the local level in various ways, but this was also not documented anywhere.

#### Highlights of Section 1:

- ▶ Of the 164 RSI-funded agencies at the local level, 47% are school districts, 35% are refugee resettlement agencies, 14% are CBOs, and 4% are “other.”
- ▶ Of the states interviewed, approximately a third fund all refugee agencies or CBOs, another third fund all school districts, and the final third fund a combination of agencies.
- ▶ There are at least six models for how RSI funds make their way from ORR to the local providers working with refugee children and families.
- ▶ Approximately half of State Refugee Coordinators feel there are significant pros and cons to funding school districts versus refugee agencies, and they named 27 factors utilized when weighing these pros and cons. Of the remaining coordinators, the majority prefer funding refugee agencies or CBOs.

### Section 2: Programmatic Priorities & Activities

Not every RSI program carries out the same activities at the state or local levels. Every program adheres to ORR’s guidance on allowable activities, but some states also set programmatic priorities. Before this survey, there was no information available on the RSI programmatic priorities set by states nor a breakdown of the various types of activities being carried out at the local level.

#### Highlights of Section 2:

- ▶ Just over half of the 38 states let their subgrantees make their own programmatic decisions, while the other half set those priorities at the state level.
- ▶ The top five activities (in order) of RSI programs are family engagement, English/academic support, out of school time programming, interpretation/translation, and teacher training.
- ▶ There are a number of states that have unique programming at the state level, such as Minnesota, Utah, Texas, and Colorado.

### Section 3: Collaboration with State Departments of Education & Leveraging Other Federal Education Funds

While Memorandums of Understanding (MOUs) used to be required between State Refugee Offices and State Departments of Education, they are no longer required. Before these interviews were conducted, it was unknown as to how many states maintained these relationships and to what extent there was any collaboration in regards to other federal education funds.

#### Highlights of Section 3:

- ▶ Of the 37 states that answered the questions on this topic, nearly half (43%) shared that they have no contact with their State Department of Education and another 43% described an informal relationship with them. Only five states identified as having a strong relationship with their State Department of Education.
- ▶ Title III, Title I Part A, and the Migrant Education program (Title I Part C) are federal funding streams that support many refugee students and families. Yet, 76% of State Refugee Coordinators stated that they do not know much about these federal funding sources and could benefit from further information. Only nine coordinators were aware of these funding streams and had even a basic understanding of them.



## Section 4: How States Manage their Refugee School Impact Program

In this section, State Refugee Coordinators were asked questions about how their local agencies and districts apply for the funds, what data is collected and how it is utilized, if outcomes are reported and how, and what types of technical assistance are available for local programs. Before this survey, this information was not documented anywhere, at least not collectively in a way that any coordinator could easily access it.

### Highlights of Section 4:

- ▶ The majority of states interviewed (62%) do not conduct a formal RFP process for RSI.
- ▶ For the states that do not require a formal RFP process, many still require some sort of application that involves submitting a scope of work, a budget, and often more.
- ▶ The majority of states interviewed only use arrival data to make their programmatic and funding decisions, but some conduct needs assessments and/or look at additional data such as grades, attendance data, and dropout data.
- ▶ Many states spoke about the difficulty in sharing data between refugee and education agencies at the state and local levels. This contributes to the difficulty in measuring the impact of RSI funds.
- ▶ States had different ideas regarding their role in providing their RSI providers with training and technical assistance. Just over half bring together their RSI staff at least once per year (either face-to-face or virtually) for peer-to-peer support.

## Conclusion

Before this survey and report, there was no information available on how RSI funds are being used at the local level throughout the U.S. nor much information on how RSI programs are being managed at the state level. This information is important so that states and local organizations can model their programs on the promising practices of others, learn from each other's mistakes, and ultimately, avoid wasting ORR dollars on "reinventing the wheel."

### Recommendations

- ▶ Recommendations are provided for State Refugee Coordinators in the final section of the report that primarily focus on connecting with one's State Department of Education, learning about federal education funding sources, and asking for technical assistance when needed.
- ▶ Recommendations are also provided for ORR and/or Switchboard on helping states to solve common problems and considering implementing the type of RSI technical assistance that was provided by BRYCS from 2008-2012.

## BACKGROUND

In September 2019, the Kentucky Office for Refugees signed an agreement with this author (Laura Gardner of Immigrant Connections) to support their Refugee School Impact (RSI) work. Part of the scope of work included conducting outreach efforts to other State Refugee Offices to identify promising practices in managing the RSI grant.

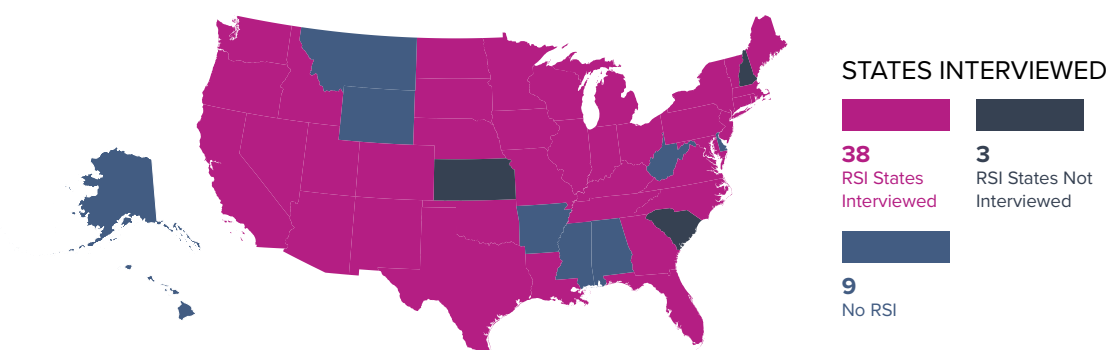
What was initially a fairly small scale project quickly developed into something more comprehensive. Other states expressed interest in the findings and the Ohio Refugee Services Program also signed on to support the work.

From January 2020 to May 2020, phone interviews were conducted with 38 out of 41 states with RSI funds.<sup>1</sup> (RSI funding is a part of each state's "Refugee Support Services Set-Asides.") The only RSI funded states that were unavailable or unreachable for an interview included Kansas, New Hampshire, and South Carolina. (See Figure 1.) Of the 38 states spoken with, 12 (32%) identified as Replacement Designees and the other 26 (68%) were part of their state's government. In most cases, the conversation was with the State Refugee Coordinator, but in some states, the conversation was with whoever manages those funds. In a few states, this involved someone from the State Department of Education. Each phone call lasted approximately 45 minutes and a set of standard questions was utilized to guide the discussion.

<sup>1</sup>Office of Refugee Resettlement. (2019, October 23). Fiscal Year 2020 Refugee School Impact Support Services Set-Aside, Dear Colleague Letter 20-03. <https://www.acf.hhs.gov/orr/resource/fiscal-year-2020-refugee-school-impact-support-services-set-aside>



Figure 1



## SECTION 1

# OVERVIEW OF TYPES OF AGENCIES & PROGRAM MODELS

At the local level, RSI-funded programs are in refugee agencies, school districts, community based organizations, and occasionally even other types of organizations. Before this survey, there was no information available on how many local organizations are funded with RSI dollars, not to mention how many of each type of organization. Furthermore, the funds “trickle down” from the state to the local level in at least six ways, but this was also not documented anywhere. Ultimately, knowing this information and the strengths and weaknesses of each approach are crucial so that RSI providers at the state and local levels can connect, learn from each other, and adapt their programs accordingly.

## Types of Agencies Funded

States were asked who they disseminate RSI funds to and information was gathered about any additional subcontracting. Of the 38 states interviewed, 37 responded to this question. **Figures 2 and 3** display the number and type of agencies with RSI funds “on the ground” after all subcontracting is complete. Overall, there are 164 entities at the local level with RSI funding. Of those, 78 (47%) are school districts, 57 (35%) are refugee resettlement agencies, 23 (14%) are community based organizations, and six (4%) are “other.”

Figure 2

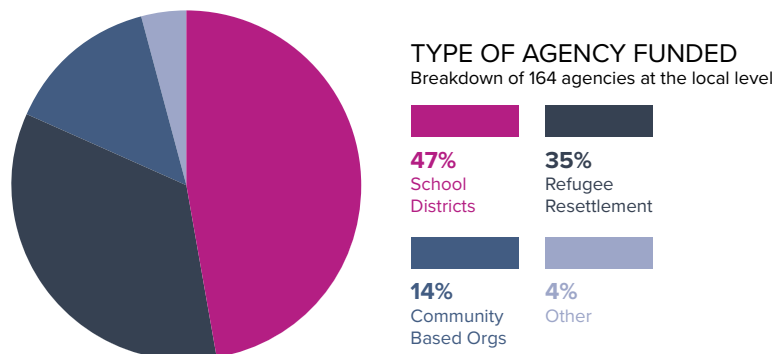


Figure 3

## TYPE OF AGENCY FUNDED

	School Districts	Refugee Resettlement	Community Based Orgs	Other	TOTAL
Arizona	6	2	0	0	8
California	12	0	0	0	12
Colorado	0	1	0	0	1
Connecticut	0	3	0	0	3
Georgia	0	4	2	0	6
Idaho	3	0	0	0	3
Illinois	1	5	0	0	6
Indiana	5	0	0	0	5
Iowa	1	0	0	0	1
Kentucky	6	2	0	0	8
Louisiana	0	2	0	0	2
Maine	4	0	0	0	4
Maryland	0	2	1	1	4
Mass.	2	4	2	0	8
Michigan	0	1	3	0	4
Minnesota	0	0	7	0	7
Missouri	3	0	0	0	3
Nebraska	2	0	0	0	2
Nevada	1	3	0	0	4
New Jersey	0	3	0	0	3
New Mexico	0	1	0	0	1
New York	2	1	0	0	3
N Carolina	0	3	1	0	4
N Dakota	3	0	1	0	4
Ohio	2	0	0	3	5
Oklahoma	1	0	0	0	1
Oregon	0	3	0	0	3
Pennsylvania	4	1	0	2	7
Rhode Island	0	1	0	0	1
S Dakota	2	0	0	0	2
Tennessee	0	4	0	0	4
Texas	2	4	0	0	6
Utah	2	0	0	0	2
Vermont	2	0	0	0	2
Virginia	0	5	0	0	5
Washington	7	2	2	0	11
Wisconsin	5	0	4	0	9
<b>TOTAL</b>	<b>78</b>	<b>57</b>	<b>23</b>	<b>6</b>	<b>164</b>



## Models of Disseminating Funds

Of the 37 states that responded to the questions about how they disseminate funds, 14 (38%) fund all refugee agencies or CBOs, 12 (32%) fund all school districts, and 11 (30%) fund a combination of all types of agencies. (See Figures 4 and 5.)

Figure 4

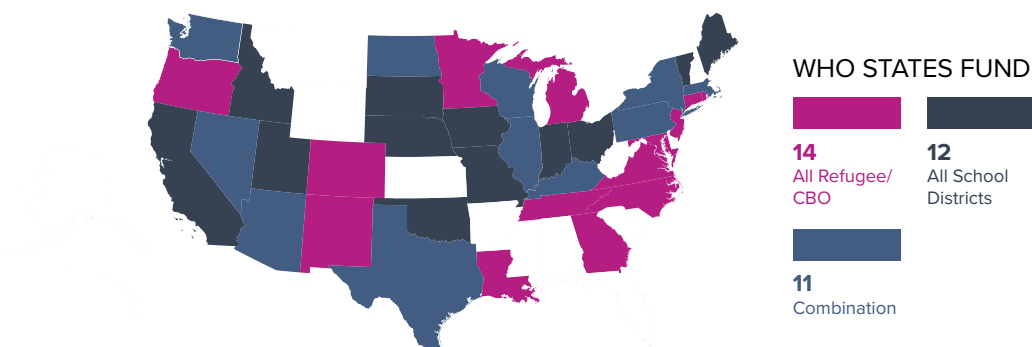
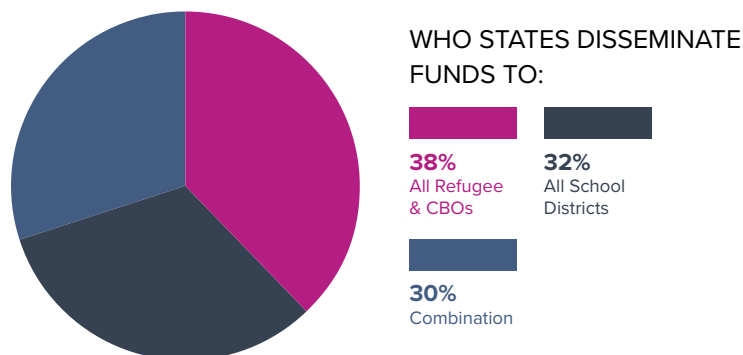


Figure 5



There are **at least six models** for how RSI funds make their way from ORR to the local providers working with the refugee children and families.

### Key

- Grantee or subgrantee
- Collaboration

Figure 6

### MODEL 1

IL, KY, MA, NE, NY, ND, TX, WI

The State Refugee Office manages the program and **funds a combination of school districts and refugee-serving agencies** (resettlement or CBOs).

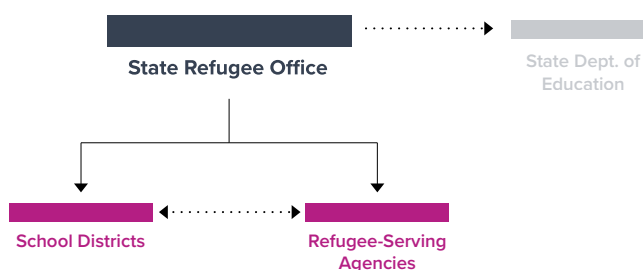




Figure 7

**MODEL 2**

AZ, CO, CT, GA, LA, MD, MI, MN, NJ, NM,  
NC, OR, RI, TN, VA

The State Refugee Office manages the program and **funds all refugee-serving agencies** (resettlement or CBOs). Those agencies may partner with their local school districts.



Figure 8

**MODEL 3**

CA, ID, IA, ME, NE, OH, OK, SD, UT, VE

The State Refugee Office manages the program and **funds all school districts**. These school districts then partner with refugee agencies and CBOs in various ways.

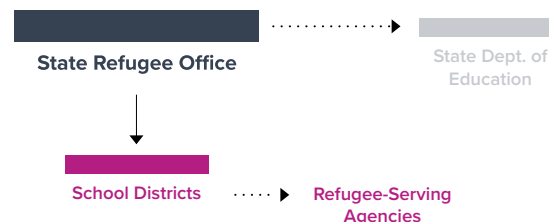


Figure 9

**MODEL 4**

IN, MO

The State Refugee Office gives the funds to the State Department of Education to manage and distribute and they **fund all school districts**.

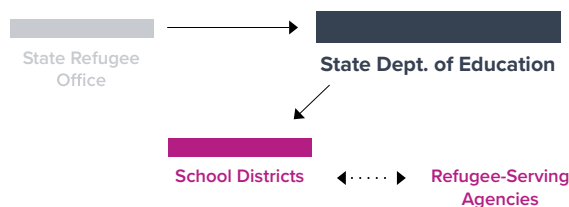


Figure 10

**MODEL 5**

PA

The State Refugee Office gives the funds to the State Department of Education to manage and distribute and they **fund a combination of school districts and refugee-serving agencies (resettlement or CBOs)**.

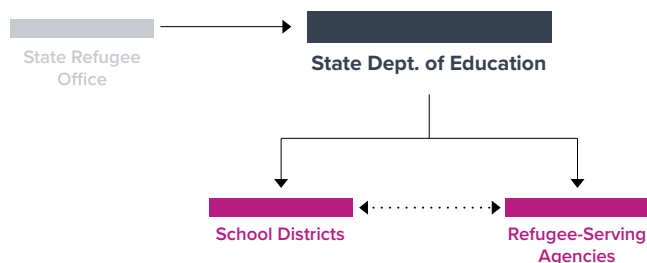


Figure 11

**MODEL 6**

WA

The WA State Refugee Office **funds a non-profit organization called "Schools Out Washington" to administer their grant**. Their staff of education experts is available to all of Washington's RSI programs. Furthermore, they have a web page for their RSI program, regular meetings and trainings, and do an excellent job of facilitating communication and collaboration among their programs.

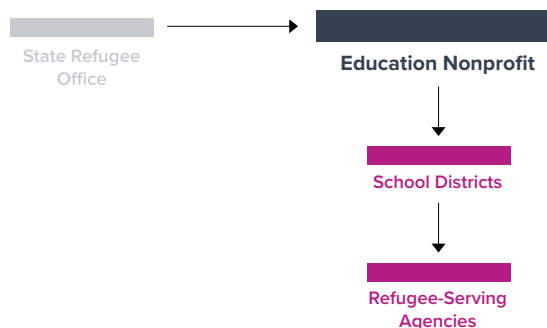


Figure 12

## FURTHER SUBCONTRACTING

In some states, such as Arizona and California, there is further subgranting or subcontracting. **Refugee-serving agencies further subcontract with school districts (AZ) or school districts further subcontract with refugee-serving agencies (CA).** A school district or refugee-serving agency may serve as a “pass through” or fiscal agent, while others simultaneously run collaborative programs.

State Refugee Office or  
State Dept. of Education

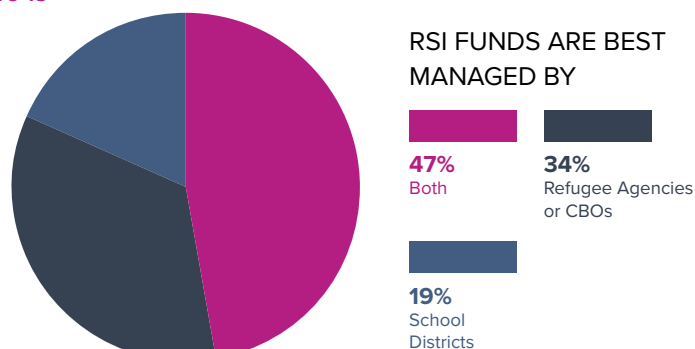
Refugee-Serving  
Agencies

School Districts

## Pros and Cons of Funding Different Types of Agencies

State Refugee Coordinators were asked if they think RSI funds are best managed and/or utilized by school districts or refugee-serving agencies (including CBOs). Of the 38 responses, seven (19%) said school districts, 13 (34%) said refugee agencies or CBOs, and 18 (47%) said something to the effect of “there are pros and cons to both” or “a combination of the two.” (See Figure 13.)

Figure 13



This question brought about a significant amount of discussion about the pros and cons of contracting with the various types of agencies. State Refugee Coordinators shared at least 27 factors that they have collectively considered when making these decisions. (See Figure 14.) Ultimately, 16 of those factors favor refugee agencies and CBOs, whereas 11 of the factors favor school districts. Yet, each factor does not carry the same weight. Some of the same factors were brought up over and over again.

For example, the number one “con” for working with school districts is their level of bureaucracy, which is hard to navigate and takes up a lot of time. At least eight State Refugee Coordinators mentioned this. One coordinator shared, “In our state, by the time we navigate the three levels of bureaucracy we have to get through, the money doesn’t get to the districts until May, June, or even July. So for practicality sake, we’re starting to look at providers that are outside of the school district so the kids can actually take advantage of it.” Another coordinator said, “I practically had to go over there to the school district with a gun to get a signature! So many people were involved just to get a signature!” This also ties in with comments made about school districts’ inability to be flexible or support innovation, which is important when working with diverse refugee populations.

The second highest “con” for working with school districts is their difficulty in establishing refugee students’ eligibility for the program. At least seven coordinators mentioned that schools are not allowed to ask immigration status and, in some cases, this became an insurmountable obstacle that forced them to change their model and who they fund. One coordinator said, “There’s no real way to pass on eligibility documents from the districts to us because they can’t ask immigration status.”

The third highest “con” for working with school districts has to do with the small amount of funds and their relative impact. This was





mentioned by at least four coordinators. One coordinator said RSI funds are a “drop in the bucket” to districts and another called RSI funds “chump change.” This often translates to RSI not being seen as important, which can lead to a slow or minimal response from districts when it comes to reporting and overall communication. One coordinator exclaimed, “\$100,000 goes nowhere in our large school districts! When we funded districts, we never saw the impact.”

At the same time, when the “pros” of funding school districts were discussed, some coordinators stated that it is too small of an amount of money to stand on its own, even for a refugee agency. Therefore, the funds were best kept in school districts, where they could be “braided” with other federal funding streams, such as Title I, Title III, and/or migrant funds. This would allow for the RSI funds to be leveraged and to fill in any gaps not covered by the other federal programs. One coordinator questioned aloud “How could amounts of money this small have a sustainable impact if you couldn't work it into Title I or Title III strategy?”

This idea around sustainability was mentioned in reference to the ultimate intent of the program, which some identified as “building the capacity within districts.” Some coordinators designed their programming with the idea that someday RSI funding might not be available. They regularly think through what they can most use the funds on now to build capacity and sustainability for the future.

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For example, one coordinator shared, “School districts are difficult to penetrate unless you have a specific relationship like grantee/grantor. When you fund school districts, you have more influence on the whole structure and changing the culture. We help districts out in their first couple years [by paying for liaison positions], model for them how it's done, and then they add [the liaisons] to their budget proposal. Now we have two districts that fund these refugee positions! This took a long time, but we're making structural changes.”

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A couple other “pros” for school districts were mentioned more than once. A few coordinators talked about how schools are the experts on educating children and youth. One said “They are the experts” and that it had never occurred to her to give RSI funds to one of the refugee agencies. The other sentiment shared is that school is a consistent part of refugee children's lives. Educators are already working with the children anyway and can integrate the services into their normal day.

As for the “pros” in funding refugee agencies or CBOs (that were not already referred to in the “cons” section for school districts above, such as eligibility documentation and the impact of a small amount of funds), the main one mentioned was cultural and linguistic responsiveness. Refugee agencies and CBOs typically have refugee staff who share the cultures and languages of the clients they work with. One coordinator said “Refugee agencies deal with refugees all day every day. They're aware of cultural norms....refugee agencies are best specialized.”

Another main “pro” raised by State Refugee Coordinators is that refugee agencies and CBOs are typically experts in family engagement. They tend to serve whole families and know how to build trusting relationships. They also have an ability or willingness to work alongside families and not be “the experts.” One coordinator talked about her related experience when she used to work at an RSI funded CBO. She said “School districts and teachers are used to being the experts. Thinking about things in a different way is sometimes a hard pill to swallow for educators. Sometimes they want to be in control and may put up walls. That's a really big challenge for external agencies to overcome, and with ECBOs that have such small capacity, there's only so much they can take if they hit a wall over and over again. School districts are not often willing to partner in a more equitable way.”

Continuing with the “pros” for funding refugee agencies and CBOs, they tend to have a significant amount of individualized contact with refugee children and families and therefore, a solid understanding of their needs. They have the history of working with refugee communities and some would argue, more of an investment in their well-being. One coordinator said “Refugee agencies are invested in those kids in a way that the school would never be.”

As for the “cons” in working with refugee agencies or CBOs, the main one shared was organizational capacity, and this was usually mentioned in regards to CBOs. Most grassroots refugee organizations do not have much infrastructure, such as departments for accounting or human resources. The RSI funding may be the first government funding they have ever received, so there is a lot of time involved in supporting them with set-up. One coordinator shared “ECBOs have a lot of soul, but not always a mind. Their work comes from emotions,



but for long-term sustainability, emotion isn't enough. School districts have the mind and the tools.”

Ultimately, some coordinators felt that each state, or even each community, needs to fund both types of agencies. Washington state has a very unique model where each funded school district must subcontract with a CBO. Washington's program coordinator said, “Schools need to be involved but can't alone serve refugee students. When school districts contract with CBOs, it's a win-win. Then you have the expertise of the schools and the expertise of the communities and can build on the assets of both.”

For the full list of factors mentioned by coordinators when weighing the pros and cons of funding school districts or refugee agencies and CBOs, see Figure 14.

**Figure 14**

### FACTORS CONSIDERED BY STATE REFUGEE COORDINATORS WHEN CHOOSING WHICH TYPE OF AGENCY TO FUND

Which one is better when considering:	Refugee Agency/CBO	School District
Accessing student data (grades, attendance, etc.) to help evaluate program		X
Amount of funding and its ability to make an impact	X	
Culturally & linguistically responsive services	X	
Curriculum alignment		X
Determining eligibility	X	
Designing programming that's responsive to students' daily academic life		X
Ease of accessing the additional programs & resources school districts have to offer		X
Ease of working with ORR's requirements & style of reporting	X	
Education expertise		X
Family engagement expertise	X	
Flexibility & innovation	X	
Focus on individualized contact with refugee children & families	X	
Have the trust of SRCs	X	
Have the trust of refugee families	X	
History of & investment in working with refugees	X	
Indirect cost rate	X	
Level of bureaucracy	X	
Level of expertise focusing on the whole child & wraparound supports	X	
Location of the children & ability to integrate services into daily lives		X
Need to advocate & build capacity from within		X
Number of refugee students & families reached		X
Organizational infrastructure & capacity for managing federal funds		X
Other federal funding sources (Title I, Title III, migrant, etc.) and the ability to leverage RSI funds accordingly		X
Other federal funding sources (Title I, Title III, migrant, etc.) and the danger of duplication of services and/or supplanting	X	
Priority of RSI funds to the organization	X	
Sustainability of RSI services if RSI money goes away		X
Willingness to not always be seen as the “experts” and to partner with refugee communities in an equitable way	X	



## SECTION 2

# PROGRAMMATIC PRIORITIES & ACTIVITIES

Not every RSI program carries out the same activities at the state or local levels. Every program adheres to ORR's guidance on allowable activities, but Policy Letter 19-01 acts more like a broad menu that programs can choose from<sup>2</sup>. Before this survey, there was no information available on the RSI programmatic priorities set by states nor a breakdown of the various types of activities being carried out at the local level. This information is important so that states and local organizations can model their programs on the promising practices of others, learn from each other's mistakes, and avoid wasting ORR dollars on "reinventing the wheel."

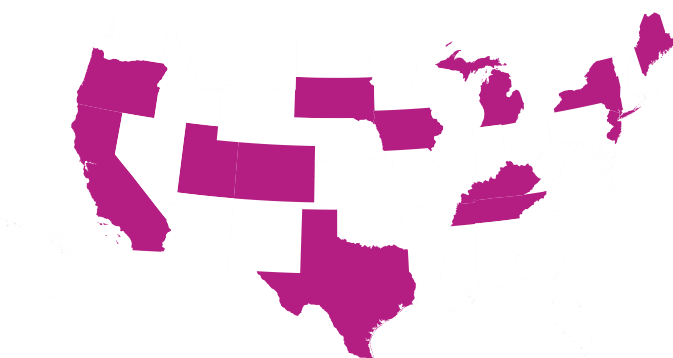
## Programmatic Priorities

State Refugee Coordinators were asked "Does your office set programmatic priorities for your subgrantees or do you let your subgrantees make their own decisions within the federal guidance?" This was almost evenly split. Twenty of the 38 states (53%) let their subgrantees make their own programmatic decisions, while 18 of the 38 states (47%) set programmatic priorities for their programs at the state level.

For the states that allow programmatic priorities to be made at the local level, they all share the allowable activities per ORR's guidance, but prefer that setting priorities within that guidance be done at the local level for a few reasons. One State Refugee Coordinator exclaimed "They know better than I what is needed!" Another State Refugee Coordinator said that flexibility is crucial because what works at one site may not work at another. A third State Refugee Coordinator shared that they like to allow the school districts flexibility "so they can use the funds to fill in the gaps." Please see Figure 15 for examples of programmatic priorities set by states.

Figure 15

### EXAMPLES OF PROGRAMMATIC PRIORITIES SET BY STATES



#### California

12 School districts

1. Community partnerships
2. Family engagement
3. Employment pathways
4. Civic engagement (newcomer leadership councils, etc.)
5. Consumer education (financial literacy, nutrition, etc.)
6. Academic Enrichment

#### Colorado

3 Refugee resettlement

1. After-school tutoring
2. Summer camp

#### Iowa

1 School district

1. Family engagement
2. Adult ESL (primarily to gain enough English to support their participation in their children's education)

#### Kentucky

6 School districts, 2 refugee resettlement

1. Out-of-school time programming (summer school)
2. Refugee advocates/cultural liaisons to support students and families
3. Training for teachers

#### Maine

4 School districts

1. Student academic development
2. Training for teachers
3. Parent involvement

#### Michigan

1 Refugee resettlement, 3 CBOs

1. School liaison
2. Peer-support after-school activities
3. Family integration activities
4. Tutoring that includes a volunteer component.
5. ESL support

#### New Jersey

3 Refugee resettlement

1. Foundational skills (this includes enrollment, orientation, service plans, family engagement, and advocacy)
2. Academic skills
3. Social, civic, and life skills (tutoring, recreation/arts, etc.)

#### New York

2 School districts, 1 refugee resettlement

1. Refugee Academy (summer orientation for students and families)
2. Academic coaches
3. Group events

#### Oregon

3 Refugee resettlement

1. Orientation
2. Monthly contact with each child
3. Summer school
4. Backpacks, school supplies, and necessary technology
5. Outreach to families
6. Special support to LGBT refugee students
7. Assisting refugee students with accessing school sports programs

#### South Dakota

2 School districts

1. School home liaisons
2. Interpretation and translation
3. School supplies

#### Tennessee

4 refugee resettlement

1. Case management for school related issues
2. School orientations for students and parents
3. Teacher training on working with refugee students and families

#### Texas

2 School districts, 4 refugee resettlement

1. Academic support development
2. Parent education
3. Teacher training on working with refugee students and families
4. Mental health

#### Utah

2 School districts

1. After-school tutoring
2. Parent involvement
3. Interpretation services

<sup>2</sup> Office of Refugee Resettlement. (2018, October 16). Refugee School Impact Program: Policy Letter 19-01. <https://www.acf.hhs.gov/orr/resource/refugee-school-impact-program>



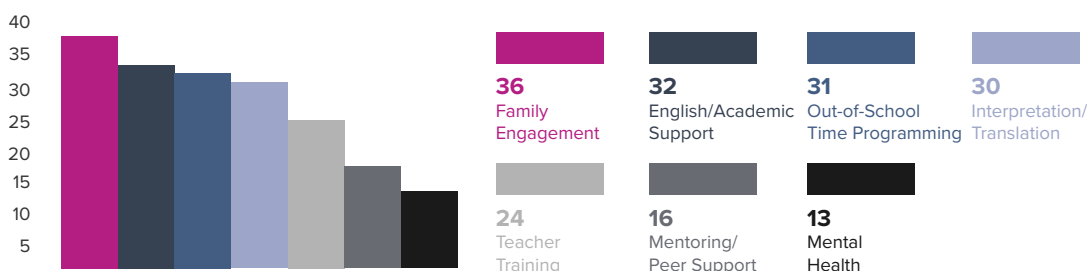
## Primary Activities

State Refugee Coordinators were asked a question about the primary activities of the RSI programs of their state. (The answer to this question was obvious for those states with specific programmatic priorities, but required more discussion for those without specific priorities.) Of the 38 states interviewed, 37 responded to this question. All 37 states identified more than one primary activity. (See Figure 16)

Figure 16

### PRIMARY ACTIVITIES OF RSI PROGRAMS

Number of states that fund each activity:



Nearly every state interviewed identified **family engagement** as a primary activity of their programming. This often included hiring liaisons to help bridge the gap between refugee families, schools, and refugee-serving agencies. The titles of these individuals vary. (In the RSI network, these individuals have a variety of titles.) Typically, the liaisons in the RSI network are refugees themselves and have lived in the U.S. for some time and/or are highly educated. This allows them to effectively serve as cultural brokers with the various refugee communities. Some liaisons are employees of their local refugee resettlement agency while others are employees of their school district. A third arrangement is when the liaisons are hired by their local refugee resettlement agency, but are based in the schools. Some common responsibilities of liaisons include facilitating ongoing communication between refugee families and schools, attending parent-teaching conferences and other meetings, providing orientation to refugee students and their families, facilitating parent workshops, and cultural consultations or training for teachers. Many RSI programs utilize liaisons, but one example is Virginia's RSI program, which is called the Virginia Refugee Student Achievement Project (VRSAP). They fund five refugee agencies and use the funds to hire nine school liaisons.

There are many other family engagement initiatives funded by RSI. For example, in Fort Wayne Indiana, teachers make home visits in the summer for new refugee students. RSI funds pay for a teacher and an interpreter to go to the home. This is an opportunity to learn about the student and family, begin to build a relationship, and to deliver school supplies. In a number of states, RSI funds are used to facilitate parent workshops, including orientation sessions to learn how to navigate the school system.

The second highest activity identified by RSI programs was around **English language development and academic support**. Some of this assistance is provided during school hours. For example, Kentucky's RSI program staff are in the schools during school time, offering academic support for students who need assistance. In New York state, their agencies hire "Academic Coaches" that are housed within the schools. These individuals offer homework assistance as well as other supports that are similar to what some liaisons do, as outlined above. In Oshkosh Area School District in Wisconsin, the vast majority of their RSI services are focused on supplemental academic support for refugee students. For example, some of the funds are used to support their district's "newcomer program," which helps students with interrupted formal education. Likewise, Twin Falls School District in Idaho uses some of their RSI funds to support their newcomer program for students with interrupted formal education.

The third most common activity identified by RSI programs was **out-of-school time programming**, which includes after school programs and/or summer programs. Many of these programs have both academic and recreational components. In New Jersey, the International Rescue Committee runs a four week summer academy with licensed teachers that mirrors the formal school setting. During the school year, they run an after school and weekend program for refugee youth that provides homework help. In Massachusetts, their two community based organizations (African Community Education and New American Association of MA) run after school and summer programs by combining RSI funds with additional funding sources. In Guilford County, North Carolina, they run a "New Arrivals Institute" that they call "Summer Literacy Arts Music and Movement (SLAMM)" for refugee children ages 6-15 years old. In Baltimore, Maryland, one of their key partners for their out of school time programming is Soccer without Borders which provides refugee youth with an opportunity to play soccer.



The fourth most common activity identified by RSI programs was **interpretation and translation services**. Most refugee providers are aware that interpretation and translation services must be provided by all agencies receiving federal funds, including school districts, due to the Title VI of the Civil Rights Act of 1964. School districts even have additional guidance around their responsibility to provide parents with information in a language they understand<sup>3</sup>. What refugee providers are often less familiar with is how those interpretation and translation services in schools must be paid for. In most cases, those services must be paid for by general or local funds because they are fulfilling a civil rights mandate. Federal funds cannot be used to pay for things that a school or district must pay for even if it didn't receive those federal funds – this is the idea behind the concept of “supplement-not-supplant.”<sup>4</sup>

Interpretation and translation are allowable activities under ORR Policy Letter 19-01<sup>5</sup>; however, their guidance does not fully recognize the complexities in funding language access that school districts deal with. A few State Refugee Coordinators had a clear understanding of this issue. One said “They [school districts] should be budgeting for the translating and interpreting in their budgets!”

Another said “Refugee kids and families are being turned away due to lack of meaningful access. All the districts have policies in the books that says we'll translate things, but that doesn't really happen.”

This sometimes leads to refugee providers attempting to fill those gaps because they feel that there is no other way families will ever get the information. A couple of states recognized the importance of advocating for what refugee families should have access to and/or modeling for districts how to do it. One coordinator said “You don't want to be giving them funds from refugee grants for this work! But they can use some of the funds to jump start the work.”

A final key activity to highlight is **teacher training**. This is a key component of programming in at least five states. In Washington, Spokane Public Schools partners with World Relief to facilitate “refugee simulation” sessions for teachers to help them “experience life from a refugee's perspective.” In Tennessee, the Nashville International Center for Empowerment (NICE) delivers presentations on particular refugee populations and always invites refugee students or parents from that community to talk about their background.

## Unique Programming at the State Level

Minnesota's RSI model is different than any other state's. They have combined their RSS funds (RSI, youth mentoring, and funds related to long-term vocational goals) to implement their programming through CBOs. All agencies funded through Minnesota's State Refugee Office are part of a regional resettlement network and operate from a family-centered, coordinated service approach. Each regional resettlement network has staff who screen families for various types of concerns in their initial meeting. No matter what a family comes in for, if it is discovered that a child is struggling in school, they will be connected with a “family coach.” This coach will help them identify goals and steps towards reaching those goals. Then, this coach will conduct weekly check-ins with the child through an evidence-based model called “Check and Connect.” Check and Connect is a goal-centered mentoring program that most school systems are familiar with. The Minnesota State Refugee Office partnered with the University of Minnesota to adapt “Check and Connect” for their refugee population. The University provides ongoing training and support for the coaches as well as the evaluation. According to Minnesota's State Refugee Coordinator, they adopted this model because they did not want agencies competing with each other for limited funds. Now they only fund consortiums.

In Utah, the two major school districts that receive refugee students (Granite School District and Salt Lake City School District) have their own internal refugee services departments and refugee case workers in their most heavily impacted schools – none of which is paid for by RSI. These refugee case workers are primarily funded by Utah Refugee Services' partnering agencies (International Rescue Committee, Catholic Community Services, and Asian Association of Utah). Part of the refugee case workers' salaries are also supported by United Way of Salt Lake, which focuses on “Collective Impact Partnerships” and “Community Schools.” The RSI funds are then used to hire a coordinator for each district who coordinates the refugee case workers who are assigned to the schools.

Texas is another unique state due to their “replacement designee” status. They do not only have one replacement designee – they have regional

<sup>3</sup> U.S. Department of Justice & U.S. Department of Education. (2015). Information for Limited English Proficient Parents and for Schools and School Districts that Communicate with Them. <https://www2.ed.gov/about/offices/list/ocr/docs/dcl-factsheet-lep-parents-201501.pdf>

<sup>4</sup> U.S. Department of Education. (2008). Supplement Not Supplant Provision of Title III of the ESEA. <https://www2.ed.gov/programs/sfgp/supplefinalattach2.pdf>

<sup>5</sup> Office of Refugee Resettlement. (2018, October 16). Refugee School Impact Program: Policy Letter 19-01. <https://www.acf.hhs.gov/orr/resource/refugee-school-impact-program>



replacement designees as well as replacement designees for particular programs. The U.S. Conference of Catholic Bishops / Migration and Refugee Services (USCCB/MRS) is the Replacement Designee for Texas' RSI program. This means that USCCB/MRS has a full time employee in Washington DC who manages the Texas RSI program. Not many states have someone whose sole job is to manage RSI, so the coordinator reports this to be a huge benefit. Indeed, this coordinator has been able to implement more support to her local programs than most. One negative is that she is quite far from the programs she oversees and required extra time to learn the Texas "landscape."

In Colorado, their RSI coordinator also manages the Unaccompanied Refugee Minor (URM) and youth mentoring programs. Though they do not have a partnership with their State Department of Education, they are well-connected and integrated with their state Office of Children, Youth, and Families. In fact, the RSI/URM/mentoring coordinator works out of that office. They are in the process of changing their RSI programming and will soon release a new RFP. They want a "Positive Youth Development" approach to be integrated into all RSI programming and a focus on integrating refugees into mainstream services. They also plan to focus on refugee youth who lack social bridges and social bonds. According to the coordinator, "We think the kids who are currently participating in our RSI programming are the ones that already have social capital. For example, kids with parents who let them stay after school or who don't have to babysit their siblings. The ones who least need the services are getting them."

## SECTION 3

# COLLABORATION WITH STATE DEPARTMENTS OF EDUCATION & LEVERAGING OTHER FEDERAL EDUCATION FUNDS

A little historical context may be useful here as we analyze the role of State Departments of Education in RSI today. The first RSI funding announcement was released in Fiscal Year 1999. It was a \$14 million discretionary grant to 36 states and the applicants were State Departments of Education. Another funding announcement for discretionary funds was released in the Spring of 2002 that also went to State Departments of Education to fund the same types of activities in Fiscal Years 2003-2005. In the third funding cycle (Fiscal Years 2006-2010), instead of awarding grants to State Departments of Education, ORR awarded the grants to State Refugee Offices. Initially, each grantee was required to enter into a collaborative relationship with their State Department of Education and to include with their application a Memorandum of Understanding (MOU) or other documentation of the collaborative relationship.

As of today, MOUs are no longer required and these relationships have disintegrated over the years in most states, as will be seen below. This is unfortunate and a crucial area for federal "players" to intervene. Without strong collaboration, states are in danger of duplicating efforts and even potentially funding the same activities. Furthermore, State Refugee Coordinators will continue to lack access to key policy makers and program managers whose decisions impact refugee students and families every day. Finally, a poor collaborative relationship at the state level almost always results in poor partnerships between refugee-serving agencies and school districts at the local level.

## Collaboration with State Departments of Education

States were asked about any type of partnership that they have with their State Department of Education. Of the 38 states spoken with, 37 answered this question. (See Figure 17.) Of those 37 states, 16 (43%) have no contact with their State Department of Education's K-12 unit. (Four of those 16 had some contact with the Adult Education unit, but not K-12.)

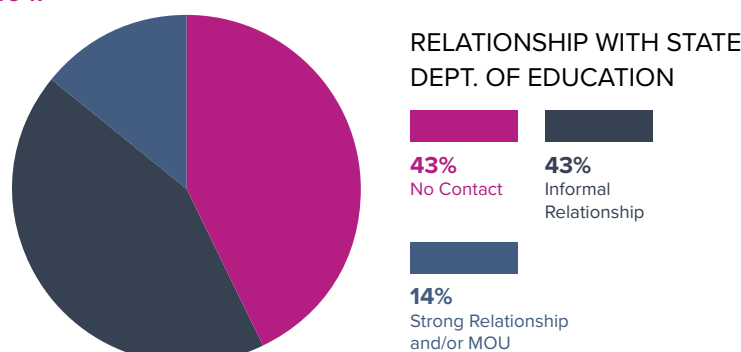
Another 16 states (43%) have an informal relationship with their State Department of Education. Many of these informal relationships are overall positive, but have not been formalized for one reason or another. One state, for example, shared "It's too bureaucratic to push through an MOU, so we formalize things in email communication." Another state commented on the "roadblocks from having two state agencies involved" and how it is "twice the bureaucracy."

Finally, the remaining five states (14%) identified having a strong relationship with their State Department of Education and in fact, four of those states have an MOU or Memorandum of Agreement (MOA) in place. Of those four states, three (Pennsylvania, Indiana, and Missouri) actually have their State Department of Education manage the entire program and funds. Only one additional state (Georgia) has an MOU in place with their State Department of Education even though they do not fund any school districts (they fund all refugee resettlement and





Figure 17



community-based organizations). The State Refugee Coordinator shared “We have a liaison at the state board of education and can call anytime. This relationship is helpful so we can try to make sure all of their educational requirements and standards are met. They also help us problem-solve when there are issues about placing kids in the proper grades and that type of thing.”

Regardless of whether the relationship was classified as formal or informal, a few states discussed how important their relationships are with their state’s Title III coordinator.

Vermont’s State Refugee Coordinator said, “It’s really important for every RSI manager to have a relationship with their state Title III coordinator. We’re small and my colleague is also an office of one (Title III), but we make an effort to keep in touch. This gives me a lot of invaluable info that I won’t otherwise have. For example, mine shares with me announcements and the emails he sends out to ESL coordinators around the state, like about the Title III grant. That’s really helpful to me because refugees are a sub-population of English Learners! We tell each other what we’re funding so we don’t duplicate. We have so little money we might as well work together!”

A couple of states spoke about how they collaborate with their State Department of Education on professional development for educators on working with refugee students and families. For example, New Jersey’s State Refugee Office has been working with their State Department of Education’s Bureau of Bilingual and ESL Education to put on a “Newcomer Summit” each spring. In Kentucky, their RSI coordinator worked with contacts at the Kentucky Department of Education to launch the Kentucky Coalition for English Learners and underwrote its first conference for educators in 2019.

A couple of states commented on how they know who their Title III coordinator is, but they don’t have any strategy or structure for developing and maintaining that relationship. A number of states talked about how they invite representatives from their State Department of Education to their quarterly consultations. Those persons may or may not attend, but it is one mechanism for reaching out and attempting to engage. Many other states were not aware of what Title III is or that each state has a Title III coordinator, which will also be discussed in the following section.

Some of the states without a relationship with their State Department of Education have tried extremely hard to make this happen.

One State Refugee Coordinator said, “It took three years of phone calls to the State Department of Education to find someone who would partner with us. After we finally found someone, they came to two advisory meetings, and now we haven’t seen or heard from them in a long time.”

A couple of states commented that partnering with the State Department of Education is not something they ever considered. One stated “We’ve never really pursued it and don’t really see the value in connecting with them.” A few states described how their local school districts hold all the power and that those relationships were the ones that needed to be nurtured, not those with state education partners.



In this part of the conversation, a number of states raised how “things used to be” when the funds were managed by state Departments of Education years ago as outlined above. Some of the “veteran” State Refugee Coordinators noted that they used to have contacts in their State Department of Education at that time, but when the funding mechanism changed, that relationship changed or stopped. Others talked about changes in the collaborative relationship when RSI stopped being a discretionary grant and became a part of RSS set-aside. One state talked about how being a Replacement Designee has impacted this relationship in that it is harder to get cooperation and collaboration from state government agencies when you are not part of state government.

## Other Federal Education Funds

Title III of the Elementary and Secondary Education Act (currently known as the Every Student Succeeds Act, or “ESSA”) is the federal funding source for English Learners in schools. The majority of these supplemental funds are utilized to support language instruction of English Learners; however, some of the funds must be spent on English Learner family and community engagement. This family engagement component used to be optional, but since ESSA came about in 2015, it is required.

In addition, Title III includes an immigrant subgrant. Title III defines “immigrant children and youth” as individuals who 1) are aged 3-21; 2) were not born in any State; and 3) have not been attending one or more schools in any one or more States for more than three full academic years.<sup>6</sup> No more than 15% of a state’s Title III grant may be reserved for this purpose. School districts are eligible to apply to their State Department of Education for a Title III immigrant subgrant when the district experiences a significant increase in immigrant student enrollment in the current year compared with the average of the two preceding fiscal years. Eligibility is established on a yearly basis.

These immigrant funds are used to pay for activities that provide enhanced opportunities for immigrant children and youth such as:

- ▶ Family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children
- ▶ Recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth
- ▶ Provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth
- ▶ Identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds
- ▶ Basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services
- ▶ Other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education
- ▶ Activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services

It is important to note that all refugee students are eligible to benefit from these funds their first three school years in the U.S. In addition, many of the allowable activities under this program (listed above) are the same types of activities as funded under RSI.

A second federal funding source that is relevant for refugee students is Title I Part A of the Elementary and Secondary Education Act (often just referred to as “Title I”). This is the funding that supports students experiencing poverty, which is measured by the number of students accessing Free and Reduced Meals (FARMS). Title I also includes funds for family and community engagement and specifically requires “regular meetings” with parents of English Learners.<sup>7</sup> Each district is required to reserve at least one percent of its Title I funds to carry out family engagement activities. (Note: in larger districts, this still amounts to hundreds of thousands of dollars.)

Lastly, the other relevant federal education funding source for refugees is Migrant Education (Title I Part C). The purpose of this program is “to assist states in supporting high-quality and comprehensive educational programs and services during the school year and, as applicable, during summer or intersession periods, that address the unique educational needs of migratory children<sup>8</sup>.” The federal government defines

<sup>6</sup> U.S. Department of Education. Title III – Language Instruction for English Learners and Immigrant Students. <https://www2.ed.gov/policy/elsec/leg/essa/legislation/title-iii.html>

<sup>7</sup> U.S. Department of Education. (2016, September 23). Non-Regulatory Guidance: English Learners and Title III of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA). <https://www2.ed.gov/policy/elsec/leg/essa/essatitleiiiguideenglishlearners92016.pdf>

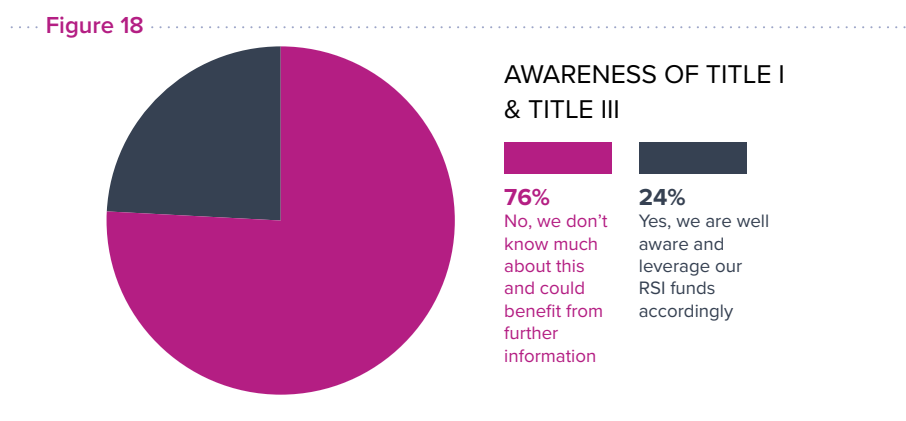
<sup>8</sup> Every Student Succeeds Act. Retrieved from § Section 1301(f). <https://www.govinfo.gov/content/pkg/BILLS-114s1177enr/pdf/BILLS-114s1177enr.pdf>



migratory child as a child or youth who made a qualifying move in the preceding 36 months a) as a migratory agricultural worker or a migratory fisher; or b) with, or to join, a parent or spouse who is a migratory agricultural worker or a migratory fisher.<sup>9</sup> Migrant funds are typically used for supplemental instructional programs (after school programs or summer programs), helping students and their families access health care and social services, family engagement initiatives, preschool programs, and so on.

It is important to note that in some cases, refugee students could also be classified as migrant students, depending on the type of work of their parents or guardians. The Pennsylvania Refugee School Impact program is housed in the same department that oversees their Migrant Program. They have many refugee students also classified as migrant students and all of their migrant forms are translated into refugee languages.

With these federal funds in mind, the State Refugee Coordinators were asked “Are you aware of what Title I and Title III funds require and do you leverage your RSI funds accordingly?” Of the 38 coordinators interviewed, 37 responded to this question. A huge majority (28 coordinators or 76%) said they do not know much about these other sources of federal funding and could benefit from further information. Only nine coordinators (24%) were aware of these funding streams and what they are for. Even fewer said they actually consider these federal programs when making programmatic decisions for RSI. (See Figure 18.)



Of the three states that manage their RSI funds within their State Department of Education, two (IN and MO) manage their RSI funds in the same department that manages Title III, which is the department for English Learners. (The third state, Pennsylvania, manages RSI out of their migrant education department.) Indiana shared “We're so used to living in the Title III world - that's something that I look for. How is this funding specific to refugee students? How is it going above and beyond? I make sure it's supplemental.”

Collaboration is obviously fairly easy for those states (since RSI and Title III are in the same department), but some State Refugee Offices have solid partnerships as well. As mentioned in a previous section, Vermont has a very strong working relationship with their state's Title III coordinator. The State Refugee Coordinator said “We tell each other what we're funding so we don't duplicate. We look to make sure we don't fund the same person for the same thing.” (For those that use their RSI funds for school districts, the person who typically manages those funds is the English Learner coordinator, who is also managing Title III.)

Other coordinators also commented on the importance of not duplicating efforts. One said “A lot of these things overlap. We have to avoid duplication. We want to use federal dollars to the max, before using RSI.” Another said “I harp on this a lot with the providers. We need to be cognizant of not building another parallel system. But at the same time, a lot of our English Learner systems are geared towards the much larger Spanish-speaking population. Our refugee population is small in comparison to everyone else. We have a difficult time in figuring how to supplement Title funds in a way that makes sense for refugee kids.”

Of the coordinators who were less aware of federal education funding streams, one very honestly said “This is why we contract more with CBOs. We don't really know what they [the school districts] are supposed to be doing with their money.” Another coordinator prepared for the interview by asking for the questions beforehand. This resulted in him reading up on Title I and Title III. He was amazed to learn how much his state gets for Title I and Title III. He was also surprised to learn that each state has Title I and Title III coordinators. He said “Until I had this conversation with you, I didn't know it was a gap that existed.”

<sup>9</sup> Every Student Succeeds Act. Retrieved from § Section 1309(3). <https://www.govinfo.gov/content/pkg/BILLS-114s1177enr/pdf/BILLS-114s1177enr.pdf>



## SECTION 4

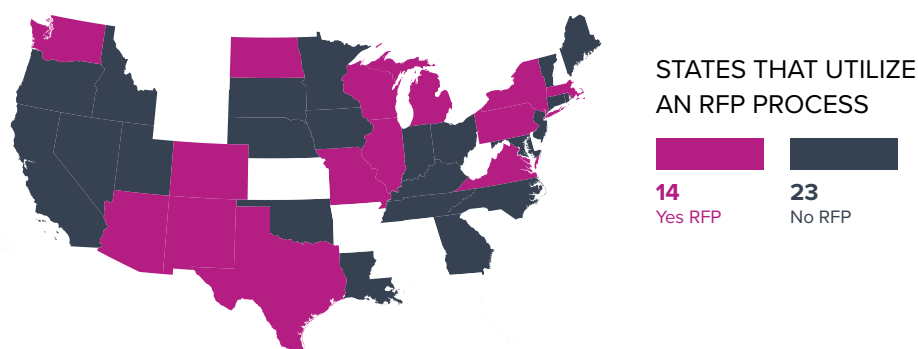
## HOW STATES MANAGE THEIR REFUGEE SCHOOL IMPACT PROGRAM

One of the primary reasons this report was requested by Kentucky and Ohio's State Refugee Coordinators is because they wanted to learn more about how other states are managing their RSI programs. Therefore, State Refugee Coordinators were asked questions about how their local agencies and districts apply for the funds, what data is collected and how it is utilized, if outcomes are reported and how, and what types of technical assistance are available for local programs. Before this survey, this information was not documented anywhere, at least not collectively in a way that any coordinator could easily access it. As previously mentioned, this type of collective wisdom and expertise is crucial so that states can learn from each other, avoid wasting ORR dollars on "reinventing the wheel," and adapt how they are managing their RSI programs accordingly.

### Applying for RSI funds

Each state was asked about their application process for RSI funds. Of the 38 states interviewed, 37 answered this question. While 14 states (38%) shared that they conduct a formal RFP process, the majority (23 states, 62%) do not. (See Figure 19.)

Figure 19



For the states that conduct a formal RFP process, it is not always facilitated by the State Refugee Office. In ten states, the process is facilitated by the State Refugee Office, but in two states it is facilitated by the State Department of Education (PA and MO). (Note: Indiana's Department of Education also manages their RSI application process, but it is not done through an RFP process.) In Washington, the RFP process is managed by an organization called Schools Out Washington. Lastly, in Arizona, the funds are given to two refugee resettlement agencies (one in each of the two main cities) and then school districts submit their proposals to them.

For the states that do not award funding through a formal RFP process, many use a formula allocation process of some kind that takes into account the number or percentage of refugee students in a particular area or district. One State Refugee Coordinator shared "We do not make it competitive. Because of the nature of where resettlement happens, it's centered in these three districts. Now because it's part of the set-aside and we know the amount, I have the districts send me a list of the kids and I go through our database and weed out the folks who arrived a long time ago (keeping within the five year time frame). They review the work they've been doing and propose anything new or take anything out and then we adjust their contract to reflect the changes."

Another State Refugee Coordinator remarked "Our state contracting allows us to enter into contracts with other governmental entities without doing an RFP or competitive bid. And school districts are considered governmental. So I negotiate a contract with them. In our contract we tell them the ORR parameters and requirements and they have to give us a budget to justify. The contract doesn't have goals and outcomes. They just have to list what services they're going to provide and the budget."



For the states that do not award funding through a formal RFP process, many still require an application of sorts. This application typically involves submitting a work plan (or scope of work) and a proposed budget. Some also require a logic model, performance indicators, and expected outcomes.

## Utilizing Data for Funding & Programmatic Decisions

The states were asked “What kinds of data do you reference when making funding decisions and/or setting programmatic decisions for RSI? How do you access this data?” Of the 34 states that responded to this question, the majority only utilize arrival data for refugee children to make their programmatic decisions. In other words, they look at the number of refugee children living in a particular area, see which school districts serve them, and make funding decisions accordingly.

There are other states, however, that look at additional data to help inform their programmatic decisions. For example, Colorado conducted a five-year longitudinal study of refugee integration in Metro Denver and was able to utilize some of that data to inform their RSI program. In addition, their RSI coordinator conducted a community needs assessment and asked refugee students and families about their needs and priorities for the program. Furthermore, their program is integrated with their state’s office of youth services and operates from a “Positive Youth Development” approach, so they look at data related to truancy and delinquency of refugee youth.

Others talked about conducting needs assessments as well, even if informally. In Nevada, their assessment included feedback from teachers, resettlement case managers, and their “Refugee School Specialist.” They also conducted interviews with a pool of refugee students and families who benefitted from the program to find out what is working well and what could be improved.

One state pointed out the importance of considering the educational background of the students being served. For example, a child with interrupted formal education who grew up in a refugee camp is going to have much different needs than someone from a country with their educational system intact.

For some of the RSI programs that are managed by their State Departments of Education, they have access to a variety of additional educational data. For example, the RSI coordinator for the Pennsylvania Department of Education shared that they look at grades, attendance data, teacher survey data, dropout data, graduate rates, and ACCESS (test for English Learners) testing data to help inform their programmatic decisions.

Lastly, in Washington state, they look at public assistance data for new arrivals as well as English proficiency data.

## Data-Sharing Issues

Many State Refugee Coordinators expressed frustration around the difficulty refugee agencies have with accessing educational data, at both the state and local levels.

**One State Refugee Coordinator shared, “To be honest, getting data from the districts is like a black hole. It’s silly but there’s no one entity in our state that knows where all refugee kids are going to school...it’s really hard to get data sharing arrangements in place.”**

Some states have even changed their model due to this data-sharing issue. For example, at one point Minnesota was funding Community Based Organizations (CBOs) in partnership with local schools, but there were barriers for schools in collecting the information that ORR needed. Therefore, they eventually transitioned to all RSI funds going to CBOs.

The data-sharing challenge most raised by State Refugee Coordinators was around eligibility documentation. School districts across the country have repeatedly told their State Refugee Coordinators that they cannot ask refugee students and parents for copies of I-94’s and/or other eligibility documentation. They feel this amounts to asking immigration status, which is precluded by *Plyler v. Doe*. Some have developed creative workarounds, but in a number of cases, it has been easier to change the program model.

There are some states that require MOUs between refugee agencies and school districts. For example, Texas requires their RSI-funded agencies



to have MOUs in place with their local school districts in order to share data, such as attendance. They specifically analyze the attendance data for their RSI students and particularly take note of which students are receiving ongoing tutoring to see if that has any potential impact on attendance.

## Program Reporting & Evaluation

Some states discussed their program evaluation efforts and how they use that data to continue to tweak their program, as is typically done when following a model of continuous improvement. For example, in Texas, after all parent orientations and workshops, parents and teachers fill out a survey to provide feedback.

A number of states mentioned the ORR-6 document and specifically Schedule D where they report on Refugee Social Services Set-Asides. This document asks for outputs, such as the number of refugee students and parents who participated in the program and the number and type of services received (i.e. orientations). There is no section or requirement for outcomes. Schedule A (“Program Narrative”) does include a small section on performance measures where the state is to “provide general description of performance measures used by the states for any of the ORR funded programs.”

One state noted that when the RSI funding was part of a discretionary grant, they had clear outcomes and indicators defined for their state. Yet now, there is so little meaningful data required on the ORR-6 that this state shared they struggle to ask their providers for more information when it’s more than what ORR requires. They said, “When ORR wasn’t asking us for this data anymore, we stopped requiring it, especially since collecting data can be kind of burdensome for providers.”

Other challenges in program reporting were mentioned. One state, which funds all school districts, discussed how difficult it is to manage a federal refugee grant with school systems.

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**This State Refugee Coordinator said “They [the school districts] don’t see kids separated out, like newly arrived refugees versus other English Learners. They don’t want to separate out those kids for activities and reporting. Getting them to complete a form that ORR wants is a big challenge.”**

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Lastly, one state commented on the difficulty of measuring the impact of RSI funds when in so many cases, the funds are co-mingled with Title III, Migrant Education, and/or other funds. If there were more funding and it was enough to create stand-alone programs, it would be easier to measure its specific impact.

## Technical Assistance from Coordinators to Local Programs

State Refugee Coordinators were asked about the types of technical assistance or support they provide to those with RSI funding in their state. Of the 38 states interviewed, 36 responded to this question. Their answers varied widely.

Some states identified their role to be fiscal oversight, but did not feel like it was their place to provide programmatic support or technical assistance on best practices in refugee education. For example, one State Refugee Coordinator said “We are not in a position to provide technical assistance. We just do financial side of things. The funding isn’t enough to create a program manager or to bring on a consultant. We’re also a Replacement Designee state. If we hired someone to provide technical assistance to the school districts we fund, what tooth would they hold?” Another coordinator said “We monitor spending and that type of thing, but that’s pretty much it. If they’ve underspent or overspent, we’ll reach out.” Still another said “We don’t provide expertise to the school districts – they’re the experts. If they need expertise around federal billing, we can do that.”

Other states shared that they have someone on staff with an educational background who leads their RSI work. For example, Wisconsin has a former educator on staff who handles their RSI program, among other things. As his schedule allows, he goes out and speaks with educators around best practices in refugee education. Similarly, New Jersey’s State Refugee Office recently hired a full-time individual to manage their state’s educational programs for refugees.

In some states, this need for educational expertise is contracted out. For example, Washington contracts with Schools Out Washington to





manage their RSI program. In Minnesota, they contract with the University of Minnesota for this expertise. In Arizona, their two lead refugee agencies (who subcontract with school districts) provide all of the education technical assistance. In Iowa, the State Refugee Office sponsors the Refugee Alliance of Central Iowa, which has an education subcommittee that brings all of the educators together.

A couple of states talked about how they would like to have an RSI manager.

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**One coordinator said “It would be really helpful if I had an RSI manager. We used to bring all of our school liaisons together every year. They’re very isolated. My state’s Title III coordinator and I used to plan a whole day of professional development together. But now I can’t do this anymore. I have too much reporting and paperwork to do.”**

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When asked more details about the types of technical assistance provided, many states discussed monitoring since their monitoring and technical assistance go hand in hand. For example, one state talked about how they monitor their programs once per year, discuss what is working and not working with them, and then their follow up technical assistance is “informal and ongoing.” Another state shared that they do their annual monitoring and if particular needs come up, then that is what they train on.

A few states described their technical assistance as not very “proactive” but very “responsive” when needs arise. In general, states talked about how they intervene as needed. One state said “We’re always available for on-site assistance. We work as a liaison between the school systems and the refugee agencies. We are strong advocates for the agencies. Agencies can call us anytime for help.” Another state said “We’re in constant contact. They come to us with their issues.” Still another state coordinator talked about how their RSI director works really closely with the school board and superintendent of the one school district to fix problems.

The tone was a little different for some. One coordinator stated “When they need help, it doesn’t tend to percolate to me. We’re more of a pass through. They don’t often need me.” In one state where RSI is managed by the State Department of Education, the coordinator said “At the Department of Education, we’re the last line of defense because the school districts have a lot of internal knowledge. Technical assistance is based on demand, but there isn’t a huge demand. We want to look at this more closely. When they ask questions, I do get back to them quickly.” Another state said “There’s a lot more we could do to help programs expand.”

States were asked about whether they bring their RSI programs together (either virtually or face-to-face) for peer-to-peer support and to discuss challenges and best practices. Five states only fund one program at the local level, so this question was irrelevant to them. Of the 31 remaining states that answered this question, 18 (58%) shared that they bring their RSI staff together at least once per year. For example, Texas regularly facilitates peer-to-peer support. They do quarterly RSI calls that start with each site giving a two minute update. They then focus on a particular topic that has been a challenge for all the sites. Some states expressed that they are planning on doing this type of thing in the future. Barriers to doing this include funding, capacity, and time for all involved. Another state shared that they used to bring together their RSI providers, but they stopped two years ago because the grantees wanted to take a break. The refugee populations and needs were too different in the various parts of the state and so the meetings stopped being helpful.

Many states mentioned their quarterly consultations or annual conferences and that they invite their RSI providers to those. In some cases, those forums provide an opportunity to discuss educational issues. For example, Indiana has an “Annual Refugee Summit” for all stakeholders and there are education breakouts. Another state talked about their annual statewide conference and said “we get a lot of educators there.”

Some states talked about providing or facilitating training for their RSI program staff. For example, Pennsylvania offers bimonthly training topics such as college and career readiness and trauma sensitive schools. Virginia has also offered their school liaisons training around trauma as well as self-care. Minnesota, through their contract with the University of Minnesota, provides training for their RSI providers. One coordinator, who primarily funds school districts, said her RSI providers “get a lot of professional development in their own districts.”

Lastly, many coordinators mentioned forwarding emails and information to their RSI providers. For example, information is forwarded from the Office of Refugee Resettlement, Switchboard, BRYCS, Migration Policy Institute, and others.



## Technical Assistance for the Network

Though not specifically asked about a need for technical assistance for the states (the whole network), a number of coordinators brought this up on their own. A number of coordinators expressed little to no knowledge of how other states use their RSI funding and expressed considerable curiosity around what others are doing. One coordinator said, “I’m not connected to anyone else in my RSI coordinator position in other states. I just listen in on SCORR calls.” Another coordinator said “When I first got this grant and didn’t know what to do with it, I luckily was able to talk to someone in New York who helped me.” One new coordinator’s supervisor is encouraging her to “find out what everyone else is doing” but she is not aware of a mechanism for doing so. Some of the State Refugee Coordinators and/or RSI coordinators who have been in their positions for some time commented on the technical assistance provided to the RSI network by BRYCS from 2008-2012 and how useful it was. One coordinator said “we still actively look at what BRYCS is doing” and another said “we still use BRYCS’ website.” At least a few coordinators said there is definitely still a need to collaborate with other states around RSI. Some talked about utilizing Switchboard’s resources, but at least one state expressed that the resources are not specific enough to their RSI needs.

## CONCLUSION

Before this survey and report, there was no information available on how RSI funds are being used at the local level throughout the U.S. nor much information on how RSI programs are being managed at the state level. This information is crucial so that states and local organizations can model their programs on the promising practices of others, learn from each other’s mistakes, and ultimately, avoid wasting ORR dollars on “reinventing the wheel.”

## Recommendations

### Recommendations for State Refugee Coordinators

- ▶ Connect with your State Department of Education and in particular, the Title III Coordinator if you have not already.
- ▶ Learn about federal education funding sources, such as Title III, Title I, and migrant funds to help determine how to best leverage RSI funds.
- ▶ Include questions on your Request for Proposal (RFP) or application about the needs of local refugee students and families and how RSI funds will be specifically targeted towards refugees (versus all English Learners).
- ▶ Consider funding partnerships (between school districts and refugee-serving agencies) or implement some other mechanism that requires collaboration among the two.
- ▶ Seek input from refugee youth, families, and community leaders when designing and implementing RSI programming.
- ▶ Identify program goals and activities and evaluate your program as much as possible to measure its impact.
- ▶ Ultimately, ask and advocate for more technical assistance related to RSI if needed.

### Recommendations for ORR and/or Switchboard

- ▶ Increase and prioritize technical assistance for those with RSI funding. Help states avoid reinventing the wheel and attempting to solve problems that are shared among states. Consider implementing the type of RSI technical assistance initiative facilitated by BRYCS from 2008-2012.<sup>10</sup> This could include:
  - ▶ Helping State Refugee Coordinators get connected to their state’s Title III coordinator
  - ▶ Regular virtual meetings to facilitate peer-to-peer exchanges across states
  - ▶ Documenting best practices and collecting resources created by programs
  - ▶ Developing and maintaining a relationship with relevant offices at the U.S. Department of Education (Office of English Language Acquisition and more). Relationships between refugee resettlement and education established at the federal level will support and facilitate relationships between refugee resettlement and education at the state and local levels.

<sup>10</sup> Disclaimer: This consultant (Laura Gardner) managed this BRYCS technical assistance initiative from 2008-2012. She is also currently a consultant for Switchboard.



## ABOUT THE AUTHOR

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Laura Gardner founded Immigrant Connections in 2017. Laura has nearly 20 years of experience working in education, refugee resettlement, and social work. While in education, she worked as a district level manager for immigrant family and community engagement as well as a school social worker. Laura also worked for Bridging Refugee Youth and Children's Services (BRYCS) managing their national technical assistance initiative to federal Refugee School Impact Grantees.

Laura has facilitated professional development on building the capacity of teachers and school systems to engage immigrant families in their children's education, language access, cultural competency, equity, unaccompanied immigrant children, immigrant family reunification, and refugee resettlement. Laura holds a Master's degree in Social Work from Columbia University and a Bachelor's degree in Education.



## OUR MISSION

Immigrant Connections improves the lives of immigrant children and families by helping educators, social workers, and other professionals better serve this population through training, coaching, and consultative services.



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SUPPORTING EDUCATORS  
AND ORGANIZATIONS