



ADMINISTRATION FOR
CHILDREN & FAMILIES

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Family Self-Sufficiency Plan Requirements to Promote Self-Sufficiency and Integration

Policy Letter 21-06

July 20, 2021

ORR is issuing this Policy Letter (PL) to provide additional guidance on the family self-sufficiency plan (FSSP).¹ Effective October 1, 2021, this PL will supersede ORR PL 19-07, *Family Self-Sufficiency Plan Requirements*.

Pursuant to 8 U.S.C. §§ 1522(a)(6)(B) and 1522(c)(1)(A)(iii), the Director of ORR (hereinafter “Director”) is authorized to develop standards, goals, and priorities, which assure the effective resettlement of refugees and which promote the economic self-sufficiency of refugees² as quickly as possible. The FSSP is defined in 45 CFR § 400.71 and required by 45 CFR § 400.156(g), for anyone who receives employment-related services funded by ORR’s Refugee Support Services (RSS), to address the employment related needs of employable members in a family. In addition, the Director has determined that in order to ensure effective resettlement, the needs of the whole family must be addressed. Experience has demonstrated that parents are unable to achieve or maintain economic self-sufficiency if the needs of members of their household³, including their children, are not met. Therefore, ORR has interpreted its authority to ensure effective resettlement of refugees and promote the economic self-sufficiency of refugees to include assessing and identifying needs for all members of the employable refugee’s household, including children, and providing services to address those needs.

In keeping with ORR’s priority to ensure holistic service delivery, ORR is augmenting the FSSP requirements in the regulations to assess needs and develop strategies for employable refugees and their family members enrolled in RSS to achieve economic self-sufficiency and longer-term integration. These augmented FSSP requirements ensure that each member of the family in the household receives a meaningful and measurable baseline assessment of their initial needs and goals, referral(s) for services, and follow-up assessments of their progress. This whole-family approach provides opportunities to address the needs of children, their

¹ The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law. This PL will be incorporated into the terms and conditions of the RSS grant and will then be binding on grantees.

² The term “refugee” is used to refer to all ORR-eligible populations as described in 45 CFR § 400.43 and ORR PL 16-01.

³ A household includes each individual member of the family, including children. The FSSP may also include other relatives living in the same dwelling that may benefit from self-sufficiency planning to facilitate economic self-sufficiency, family stability, and community integration. However, other relatives’ participation in self-sufficiency planning is not required for the family to receive services. States should also consider the resources other family members contribute to the family’s ability to achieve and maintain self-sufficiency.

parents, and other family members in the household to achieve stability and facilitate upward mobility; it requires an on-going connection with refugees within the first year of enrollment. The FSSP requirements also establish a consistent standard for implementing and reporting FSSPs across states.

I. General Requirements and Principles

ORR is not requiring states to use a specific form or refer to their assessment as a FSSP. States may develop or use their own processes and systems to conduct assessments, make referrals, and conduct follow-up activities as long as the assessments, referrals, and follow-up activities are clearly documented in the case file, and as long as states comply with ORR reporting requirements as outlined in the revised ORR-5.

States and replacement designees (hereinafter referred to as “states”) must ensure that a client’s FSSP is completed within 30 days of enrollment in RSS employability services. The FSSP must include each member of the family (including children) in the household if at least one adult is seeking RSS employability services as defined in 45 CFR § 400.154.

If a client has limited English proficiency, states must ensure that the FSSP is translated into the primary language of the client, or that an interpreter was provided as required by [ORR State Letter 05-20](#).

States have the authority and flexibility to create additional reporting requirements and elements within the FSSP to capture services defined by the state and described in 45 CFR § 400.155. ORR encourages states to identify and analyze outcomes that will be beneficial to clients, program management, and the administration of their program.

Family self-sufficiency planning should be approached from a strengths-based perspective that focuses on an individual’s strengths and goals. In addition, this process is an opportunity for the provider to build positive, ongoing, and goal-oriented relationships with families. As such, the FSSP should be developed in partnership with the family to identify needed services to reduce barriers to becoming economically self-sufficient as a result of the employment of one or more family members.

The FSSP is a living document that begins with a comprehensive initial needs assessment and is updated throughout the service period. The FSSP requirements should not duplicate or supplant the requirements of other programs.

II. Exceptions

The following are exceptions to the general requirements:

1. A FSSP is not required for an individual client enrolled only in English as a Second Language (ESL) classes for purposes other than obtaining, retaining, or upgrading a job. For example, a FSSP is not required for clients who are already employed and enroll in ESL classes to improve their English language skills.
2. A new FSSP is required for a client who migrates to a new state or changes providers within a state and re-enrolls in RSS employability services as defined in 45 CFR § 400.154. The FSSP in the new location must be completed within 30 days of enrollment

in RSS employability services. The follow-up assessments should take place 6 and 12 months from the date of enrollment at the secondary location.

III. Required Elements of the FSSP

States must ensure that the following elements are included in every FSSP:

1. A comprehensive initial assessment for each family member in the household (including children) that includes:
 - a. Strengths/assets
 - b. Stressors/barriers
 - c. Strategies for overcoming barriers

States must ensure that all adults in the family are interviewed, have a needs assessment, and are provided referrals to services, as appropriate. Information about a child's needs may be obtained by interviewing the adults in the family.

2. A family budget that includes itemized expenses and source(s) of income and earnings that contribute to a family's ability to achieve economic self-sufficiency.
3. An Individual Employability Plan (IEP) for employable adult(s).
4. Self-reported English language ability and education level for individuals 16 years of age and older.
5. Short-term and long-term goals, including at least one primary goal for each family member in the household. Additional barriers and goals identified during the assessment must be recorded in the case file. If, after careful consultation with the client, there is an inability to identify a goal for inclusion in the FSSP, the case file should indicate that no goal was identified.

ORR defines the initial primary goal as the one that will address the most critical obstacle an individual needs to overcome by the end of 12 months to work towards the family's longer-term self-sufficiency and integration.

6. Referral(s) to ORR and non-ORR funded services to pursue the goals identified. The initial primary referral relevant to the initial primary goal must be documented in the case file. Referrals to address other goals must also be documented in the case file.
7. A follow-up assessment of progress at 6 and 12 months (for more information see section IV).

IV. Requirements for Follow-Up Assessments of Client Progress

States and or their designees are required to have regular contact with clients and must complete follow-up assessments at 6 and 12 months from the date of enrollment in RSS employability services. Follow-up assessments of client progress ensure that a family is actively engaged and working toward meeting their goals. It also enables a state and its designee(s) to monitor the impact of the referrals and/or services provided, and the family's progress toward self-sufficiency.

Follow-up assessments must include:

1. An assessment of the progress and outcomes towards meeting the previously established short- and long-term goals. The client's status at 12 months (in relationship to the initial primary goal identified upon enrollment) will fall into one of the following categories:
 - a) Initial primary goal met;
 - b) Initial primary goal not met, progressing within initial referral to service(s);
 - c) Initial primary goal not met, additional referral(s) provided; or
 - d) Unable to provide information (for clients who are unreachable or unwilling to participate in follow-up activities).
2. Identification of any new barriers hindering client progress and goal(s) necessary to achieving self-sufficiency.
3. New referrals made, if applicable.
4. Employment status for individuals 16 years of age and older. If the client was employed at any time during the first 12 months from the date of enrollment, the case file must include:
 - a) Number of months employed full-time
 - b) Number of months employed part-time
 - c) First employment date
 - d) Best hourly wage earned
5. A revised family budget, if appropriate.
6. A revised IEP for adult client(s), if appropriate.

States must ensure that the outcomes of the 6- and 12-month follow-up assessments of progress are documented in the case file. Follow-up assessments should be conducted for clients who may have met their goals or are no longer actively receiving services.

If a client remains engaged in services for more than 12 months, the nature of the services recommended, the referral(s) provided, and the client's progress toward economic self-sufficiency and/or integration must be documented in the case file.

If a family is unable to be reached or has out-migrated at the 6- or 12-month mark, a state or its designee(s) may use their best available data from a previously conducted exit interview or case file documentation to determine the client's status.

V. Reporting Requirements

States are required to report elements of each client's FSSP to ORR on the revised ORR-5 (OMB #0970-0043). To access the ORR-5 and detailed instructions, see [ORR Report Forms](#) and [Dear Colleague Letter 21-13](#).

If you have questions about the information contained in this PL, please contact ORR's Refugee Policy Unit at refugeepolicy@acf.hhs.gov.

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