

# **STATE AUDITOR'S REVIEW OF VERMONT'S REFUGEE RESETTLEMENT EFFORT**

**October 1, 1997 to September 30, 1999**

## **Executive Summary**

**The Office of the State Auditor has conducted a review of the Agency of Human Service's (Agency's) administrative oversight of its grant agreement with Immigration and Refugee Services of America's (IRSA's) Vermont Refugee Resettlement Program (VRRP).**

**The Agency did not use all federal resources available for settling refugees in Vermont, but ended the year with a large surplus that cannot be used for any other purpose.**

**By adhering to minimum federal refugee employment standards, the Agency did not ensure that refugees achieved the federal goal of economic self-sufficiency. To the contrary, we found that refugees exiting the program could fall below the federal poverty level and qualify for TANF and other forms of public assistance.**

**The Agency also failed to review the program's financial records, failed to document its review of program case files, and failed to collect outcome data sufficient to determine whether refugees are achieving economic self-sufficiency. As a consequence it had no reliable way of measuring the utility or verifying the success of the Vermont Refugee Resettlement Program's efforts.**

## **Background**

**Nearly 3,500 refugees have resettled in Vermont since 1980. Since 1990, the number who arrived annually in Vermont had been between 250 to 275, but the number of new refugees rose to 378 in 1998 and 398 in 1999; most were Bosnian, while fewer were Vietnamese and other nationalities.**

**In order to be designated as refugees, individuals must have a well-founded fear of persecution in their country of origin because of race, religion, nationality, membership in a particular social group, or political opinion. Refugees admitted into the United States must have a connection**

to the United States such as former employment by the U.S. Government, close relatives living in the United States, and/or persecution specifically related to association with the U.S. Government. Refugees may also be admitted on humanitarian grounds.

The Immigration and Refugee Services of America's (IRSA) Vermont Refugee Resettlement Program (VRRP), based in Colchester, is designed to help refugees achieve economic self-sufficiency and social adjustment within the shortest time possible following their entry into the United States. Through the efforts of the VRRP, in conjunction with the Vermont Department of Social Welfare and other State entities, refugees receive cash and medical assistance, social services, and preventive health services.

VRRP has 5.25 full-time staff, including case managers and employment counselors, and has 15 contracted interpreters. Case managers help refugees to find a place to live, to develop a plan for establishing self-sufficiency, to access cash and medical assistance for which they qualify, and to establish bank accounts. Employment counselors work with refugees to locate jobs as soon as possible, focusing on job preparedness and job referrals and on access to State employment services.

Funds received by the State from the federal Office of Refugee Resettlement (ORR) pay for a variety of refugee resettlement services, including cash assistance, medical assistance, and social services. The Department of Social Welfare administers the Refugee Cash Assistance and Refugee Medical Assistance programs. The Agency grants Refugee Social Service funds to IRSA, a private non-profit organization based in Washington, DC., for the purpose of providing social services to refugees in Vermont through VRRP. IRSA also receives funds directly from the federal government and from other sources.

A State Refugee Coordinator, who works in the Agency Secretary's Office, is responsible for overseeing the State's resettlement efforts, for reporting to ORR on cash and medical assistance expenditures, for monitoring the IRSA social services grant, and for providing ORR with performance reports on ORR-established outcome measures.

In federal FY1998, the Agency received \$266,477 in Refugee Social Service funds from the federal ORR and it granted \$164,563 to IRSA, all of which was expended by IRSA. In federal FY 1999, the Agency received \$336,983 from ORR and its grant to IRSA increased to \$308,450, of which \$248,951 was expended by IRSA. Funds granted but not spent are held by the Agency.

## **Failure To Use All Available Federal Resources**

**We found that the Agency, which was granted \$336,983 in federal Refugee Social Service funds for FY 1999, ended the year with an unexpended balance of \$208,833. These funds could be spent to provide additional assistance to refugees in Vermont but must be returned to the federal government if they remain unspent. We also found that the Agency did not make full use of other federal funding available for administrative expenses.**

**We recommend that the Agency use all available federal resources to assist refugees in achieving economic self-sufficiency, job placement consistent with their training and skills, and social adjustment in their new community.**

### **Failure To Review Finances and Document Program Oversight**

**We found that the Agency failed to meet its federally mandated responsibility to review the Immigration and Refugee Services of America's audited financial statements and also failed to document its data collection process in reviewing other aspects of the Program.**

**We recommend that the Agency comply with its federally mandated oversight responsibilities by reviewing Immigration and Refugee Services of America's audited financial statements and by fully documenting all aspects of its oversight of the Program.**

### **Failure To Follow Or Amend State Refugee Resettlement Plan**

**We found that the Agency was not in compliance with the federally approved State Plan for Refugee Resettlement and had not amended the Plan to reflect Program changes as required by federal regulation.**

**We recommend that the Agency comply with the State Plan and also comply with federal requirements to amend the State Plan whenever necessary to keep it current.**

### **Failure To Collect Data Sufficient To Evaluate Program**

**We found that the Agency did not collect outcome data sufficient to determine whether refugees are achieving economic self-sufficiency. As a consequence it had no reliable way of measuring the utility or verifying the success of the Vermont Refugee Resettlement Program's efforts.**

**We recommend that the Agency collect, or require the collection of, outcome data to assess the effectiveness of job placement based upon its definition of "appropriate employment" as a means to achieving economic self-sufficiency. These data should be used to make policy decisions to**

improve the overall effectiveness of the Program in helping refugees achieve a level of economic self-sufficiency that does not depend on public assistance.

### **Compliance With Minimum Federal Standards Does Ensure Achievement of Federal Program's Goals**

We observed that the Agency's adherence to minimum federal standards for appropriate employment was not sufficient to ensure that refugees achieve the stated goal of economic self-sufficiency. In fact, refugees achieving the operative standard of economic self-sufficiency might still be below the federal poverty level and be eligible for TANF and other federal assistance.

We recommend that the Agency 1) amend the State Plan to define economic self-sufficiency for refugees as income sufficient to cover basic needs without recourse to public assistance, 2) consider "livable wages" or some similar meaningful standard in developing an effective definition of "appropriate employment," and 3) require the Vermont Refugee Resettlement Program to place more emphasis on matching the skill and experience levels of refugees when locating "appropriate employment."

## **STATE AUDITOR'S REVIEW OF VERMONT'S REFUGEE RESETTLEMENT EFFORT**

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### **I. PURPOSE**

The Office of the State Auditor has conducted a review of the Agency of Human Service's (the Agency) administrative oversight of its grant agreement with Immigration and Refugee Services of America's Vermont Refugee Resettlement Program (VRRP).

The purpose of the review was to assist the management of the Agency in achieving the goals of the program as defined in 8 United States Code § 1522.

## **II. AUTHORITY**

**This review was conducted in accordance with this office's responsibilities and authority contained in 32 V.S.A. §§ 163 and 167 and was performed in accordance with the U.S. General Accounting Office's Government Auditing Standards and the American Institute of Certified Public Accountants' Statement on Auditing Standards, as part of the State Auditor's annual audit of the State's General Purpose Financial Statements and its Federal Assistance Programs.**

## **III. SCOPE AND METHODOLOGY**

**The scope of the review included an evaluation of the operation and financial management of the Agency's oversight of the program, including compliance with relevant statutes, regulations, and grant agreements. The methodology included a review of relevant statutes, regulations, grant applications, grant agreements, internal memoranda, and correspondence, as well as meetings with the Agency and VRRP staff, and all other sources as detailed in the footnotes to this review.**

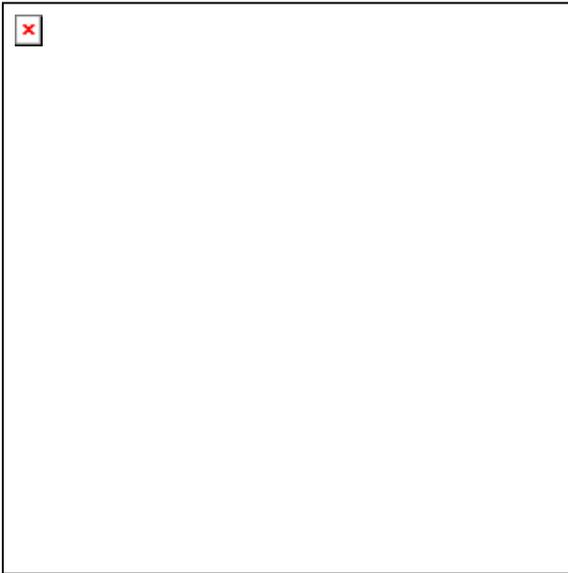
**A review differs substantially from an audit conducted in accordance with applicable professional standards. The purpose of an audit is to express an opinion. The purpose of a review is to identify findings and observations and to make recommendations so that the reviewed agency can better accomplish its mission and more fully comply with laws and regulations. This review relied upon representations of, and information provided by the Agency and VRRP staff. If an audit had been performed, the findings and recommendations may or may not have differed.**

## **IV. BACKGROUND**

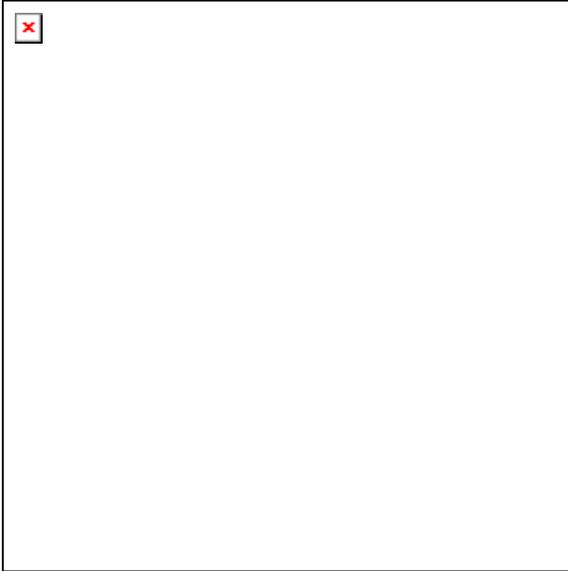
**The federal Office of Refugee Resettlement reports that over 2 million refugees have resettled in the United States since 1975. In order to be designated as refugees, individuals must have a well-founded fear of persecution in their country of origin because of race, religion, nationality, membership in a particular social group, or political opinion. Refugees admitted into the United States must have a connection to the United States such as former employment by the U.S. Government, close relatives living in the United States, and/or persecution specifically related to association with the U.S. Government. Refugees may also be admitted on humanitarian grounds.**

**Refugees resettling in the United States reflect changing political circumstances around the globe. Prior to 1997, refugees from Vietnam were the largest group by country of origin. Since 1997, refugees from the former Soviet Union represent the largest group by country of origin. The population of refugees resettling in Vermont reflects these same trends. For example, in federal FY 1998, most refugees who settled in Vermont were Bosnian (318) while fewer were Vietnamese (39) and other nationalities (21).**

**Nearly 3,500 refugees have resettled in Vermont since 1980 [see Figure 1].**



**Since 1990, the number who arrived annually in Vermont had been between 250 to 275 (see figure 2) but the number of new refugees rose to 378 in 1998. In 1997, 279 refugees resettled in Vermont, as compared to 267 in New Hampshire and 196 in Maine. According to the Agency, 398 refugees resettled in Vermont during federal FY 1999.**



**The federal Refugee Resettlement Program is designed to help refugees achieve economic self-sufficiency and social adjustment within the shortest time possible following their entry into the United States. Federal funds are provided to states for the provision of cash and medical assistance, social services, and preventive health services.**

**The State of Vermont receives funds from the federal Office of Refugee Resettlement (ORR), which is part of the Department of Health and Human Services Administration for Children and Families. The funds are granted to the State to provide refugee resettlement services, including cash assistance, medical assistance, and social services. The State Refugee Coordinator, who works in the Office of the Secretary of the Agency of Human Services, is responsible for overseeing the State's resettlement efforts. The Department of Social Welfare administers the Refugee Cash Assistance and Refugee Medical Assistance programs. The Agency grants Refugee Social Service funds to Immigration and Refugee Services of America (IRSA), a private non-profit organization based in Washington, DC, for the purpose of providing social services to refugees in Vermont through its Colchester-based Vermont Refugee Resettlement Program (VRRP).**

**The development of Vermont's current service delivery system began in 1980 when Governor Richard Snelling authorized the Agency of Human Services to oversee refugee services. At that time, services were administered through the Department of Social and Rehabilitation Services, with help from volunteers from the local faith communities who were affiliated with a number of national Voluntary Agencies. According to the Agency, in 1985 the State, as an affiliate of the American Fund for Czechoslovak Refugees, Inc., (a national Voluntary Agency), sponsored and resettled refugees. When that organization discontinued participation**

**in refugee resettlement in 1990, the State affiliated with another Voluntary Agency, The American Council for Nationalities Service, which later changed its name to Immigration and Refugee Services of America (IRSA). In 1993, IRSA established its field office in Vermont, known as the Vermont Refugee Resettlement Program. It was also in 1993 that the State discontinued its affiliation with a national Voluntary Agency and opted through agreement to grant Refugee Social Service funds to IRSA.**

**In federal FY1998, the Agency received \$266,477 in Refugee Social Service funds from the federal ORR and it granted \$164,563 to IRSA, all of which was expended by IRSA. In federal FY 1999, the Agency received \$336,983 from ORR and its grant to IRSA increased to \$308,450, of which \$248,951 was expended by IRSA.**

**Like Vermont, most states do not provide direct social services with their federal ORR funds. A few states, including Vermont, award funds to a single agency to provide refugee services. A number of states award funds to more than one agency. For example, the State of New Hampshire awards funds to three Voluntary Agencies that provide services in different areas of the state. In Vermont, there is one field office for the State. At present, there are no national data on best practices for refugee resettlement program management, and each state has its own approach.**

## **V. PROGRAM OVERVIEW**

**When refugees arrive in Vermont, a VRRP case manager meets them at the airport and takes them to the office at the Fort Ethan Allen complex in Colchester. Case managers immediately begin to help the refugees orient themselves to their new surroundings by focusing on the following activities:**

- 1. Finding them a place to live.**
- 2. Helping them furnish their homes.**
- 3. Developing a plan for establishing self-sufficiency.**
- 4. Directing refugees to the Department of Social Welfare so that they may access cash and medical assistance for which they qualify.**
- 5. Teaching them the system for accessing cash benefits through electronic transfer accounts.**
- 6. Helping them establish bank accounts.**

**Together, case managers and employment counselors work with refugees to develop family self-sufficiency plans. Case managers monitor the status of the plans and provide referral and advocacy services to accomplish**

goals set out in the plan. Individualized follow-up and monitoring are done for eight months after refugees arrive in Vermont.

VRRP employment counselors work with refugees to locate jobs as soon as possible. The counselors work on job development in general and work with refugees individually on job preparedness and job referrals. Employment counselors assist refugees in accessing employment services provided by the Vermont Department of Employment and Training and they do follow-up monitoring of refugees for 90 days after initial job placement.

In FY 1998, VRRP served an average of 115 individuals each quarter. Case managers generally serve about 31 individuals per quarter, and employment counselors serve about 20 per quarter. There are no national standards for caseloads, given the wide variations in refugee needs and resources, community resources, and employment availability. The State grant does not specify caseload limits.

VRRP has 5.25 full-time staff, including case managers and employment counselors, and has 15 contracted interpreters. Staff members speak several languages including Vietnamese, Khmer, Serbo-Croatian, Russian, and German. Interpreters are hired to provide translation services if clients speak languages other than those spoken by staff members.

The Agency's State Refugee Coordinator submits quarterly reports to the federal ORR on cash and medical assistance expenditures using information provided by the Department of Social Welfare. The Coordinator also is responsible for overseeing the IRSA social services grant, and provides the federal ORR with required quarterly performance reports on federal ORR established outcomes.

## **VI. FINDINGS AND RECOMMENDATIONS**

### **FINDING 1:**

The Agency, which was granted \$336,983 in federal Refugee Social Service funds for FY 1999, ended the year with an unexpended balance of \$208,833. These funds could be spent to provide additional assistance to refugees in Vermont but must be returned to the federal government if they remain unspent. The Agency also did not make full use of other federal funding available for administrative expenses.

### **Discussion:**

For federal FY 1997 through 1999, the State was awarded a total of \$739,458 in Refugee Social Service funds from the federal ORR. These funds pay for case management, translation, and employment- and health-related services. During the same period, the Agency paid IRSA a total of \$530,625 to provide these services, leaving an unspent balance of \$208,833.

While unspent funds may carry forward for up to two years, the Agency's balance of unspent Refugee Social Service funds exceeds 28 percent of the total funds awarded for the three-year period, and is greater than the entire amount of Refugee Social Service funds the Agency received in FY 1997. Unspent funds that are not drawn down within the allotted time frame revert back to the federal government.

With respect to other funding for administrative costs, federal money is available to the State for "reasonable and necessary identifiable administrative costs" associated with the provision of refugee cash and medical assistance.

In FY 1998, \$38,244 in administrative expenses was charged against these funds, but the costs reported were not directly related to the administrative costs of providing Refugee Cash and Medical Assistance services. Rather, they were related to the Agency's general oversight of the Program. While these administrative costs are allowable under law, the Agency failed to charge off direct costs associated with the Agency staff who provide Refugee Cash and Medical Assistance services. Failing to do so resulted in the expenditure of an undetermined amount of State and other federal funds that would have been available for other purposes.

#### **RECOMMENDATION 1:**

The Agency should ensure that the Program makes a continuing effort to use all available federal funds to assist refugees in achieving economic self-sufficiency, job placement consistent with their training and skills, and social adjustment in their new community.

The Agency should maximize the expenditure of available federal funds for administrative expenditures related to providing Refugee Cash and Medical Assistance services.

#### **FINDING 2:**

The Agency failed to meet its federally mandated responsibility to review the Immigration and Refugee Services of America's audited financial statements.

**The Agency also failed to document its data collection process in reviewing other aspects of its grant agreement with the Vermont Refugee Resettlement Program.**

**These failures are evidence of a lack of an adequate internal control process with respect to providing reasonable assurance that the Agency is meeting its objectives of reliable financial reporting and the effective and efficient administration of its grant agreement with IRSA.**

**Discussion:**

**As a condition of receiving federal funds, a non-federal pass-through entity such as the Agency must ensure that a subrecipient such as the Program meets federal auditing requirements. The Agency must issue a management decision on any audit findings within six months after receipt of the audit report of the Program, and must consider whether the audit necessitates adjustment of the Agency's records.**

**In this case, the VRRP is a program of the Immigration and Refugee Services of America, a national non-profit corporation that receives some federal funds through the Agency and other funds directly from the federal ORR, and from other sources.**

**The Agency did not require IRSA to submit copies of its annual audit to the Agency for review. This omission represents noncompliance with federal requirements, and also is evidence of the Agency's lack of internal controls over the expenditure of the funds involved.**

**According to federal regulations, the Agency must have a "systematic planned examination and evaluation of operations in local offices." As part of its quarterly program reporting process related to data collection, the Agency's oversight efforts included quarterly reviews of VRRP case files to ensure that social services outlined in the grant were properly documented. However, according to the State Coordinator, the Agency does not document these quarterly case file review efforts. This, too, is evidence of the Agency's lack of internal controls over its ability to evaluate the extent to which the Program achieved the goals and objectives for which the funds were granted.**

**RECOMMENDATION 2:**

**The Agency should comply with its federally mandated oversight responsibilities by reviewing Immigration and Refugee Services of America's audited financial statements and should fully document all aspects of its oversight of the grant agreement with the Vermont Refugee**

**Resettlement Program to provide reasonable assurance that the Agency is meeting its internal control and compliance responsibilities.**

**FINDING 3:**

**The Agency was not in compliance with the federally approved State Plan for Refugee Resettlement and had not amended the Plan to reflect Program changes as required by federal regulation.**

**Discussion:**

**In order for a state to receive federal funds, a state must submit an approved plan. Federal regulations require states to "certify no later than 30 days after the beginning of the federal fiscal year that the approved State plan is current and continues in effect."**

**The current Vermont State Plan is dated December 1995 and specifies that the State will expend social service funds on English as a Second Language training (ESL). In fact, the State did not use federal funds for ESL training during the review period. In addition, the plan indicates that the Refugee Resettlement Coordinator's position became full time in May 1995. However, the Coordinator reported that he spent only 35 percent of his time on the program. Failure to follow and amend the State Plan is evidence of a breakdown in the Agency's internal controls related to the effective and efficient operation of the program and compliance with applicable laws and regulations.**

**RECOMMENDATION 3:**

**The Agency should comply with the State Plan and should comply with federal requirements to amend the State Plan whenever necessary to keep it current.**

**FINDING 4:**

**The Agency does not collect outcome data sufficient to determine whether refugees are achieving economic self-sufficiency. As a consequence it has no reliable way of measuring the utility or verifying the success of the Vermont Refugee Resettlement Program's efforts. This demonstrates a weakness in the Agency's internal control process as it relates to the Agency's ability to effectively administer its grant agreement with IRSA and, more broadly, the State Plan for the Refugee Resettlement Program.**

## **Discussion:**

In order for the State to receive federal ORR funds, the State must meet ORR-directed "standards, goals, and priorities.... which assure the effective resettlement of refugees and which promote their economic self-sufficiency as quickly as possible and the efficient provision of services."

Each year, the ORR must approve the State's Annual Goal Plan, which outlines goals for resettling refugees in Vermont. The outcome measures reported in the FY 1998 and 1999 Goal Plans included such measures as the average hourly wage for refugees at the time of job placement, and the number of individuals who:

1. became employed;
2. had their cash assistance reduced;
3. had their cash assistance terminated;
4. retained employment;
5. entered employment with health benefits.

Although these measures are useful, some may be too narrowly drawn. For example, while information about the reduction and termination of cash assistance information is important, it ignores other types of public assistance such as publicly assisted housing, fuel assistance, the earned income tax credit, child care subsidies, and Medicaid.

During the review period, individualized follow-up and monitoring were done for eight months after refugees arrived in Vermont and individual employment activity was tracked for 90 days following initial job placement. The Quarterly Program Reports filed by the Agency with the ORR included only aggregate data on placement in employment, average hourly wages, and receipt of social services during refugees' first year in Vermont. Neither the Agency nor VRRP collected aggregate data on refugees' employment skills, education, or economic status at entry into the program, or at follow-up points following entry to determine long-term economic outcomes. Nor were such aggregate data collected on the type of employment in which refugees were placed, the number of refugees in professional training programs, data on family size or the number of income-earning adults and children within each family unit.

## **RECOMMENDATION 4:**

The Agency should collect, or require the collection of, outcome data to assess the effectiveness of job placement based upon its definition of "appropriate employment" as a means to achieving economic self-sufficiency.

Such aggregate measures should include important indicators at program entry such as educational levels, readiness, employment skills, economic status, and demographic information about refugee families (e.g., number of wage earners and dependents). The Agency should collect data at regular intervals for outcome measures such as employment status, type of occupation, match with previous skills, income level, and use of public assistance programs such as food stamps, TANF and Medicaid. In addition, data should be collected on the number of refugees enrolled in professional training programs, including the type of training and outcomes related to completion of the program, licensing or certification, and placement in employment consistent with training.

Collectively, these data should be used to make policy decisions to improve the overall effectiveness of the Program in achieving the goal of economic self-sufficiency without reliance on public assistance.

## **VII. OBSERVATION AND RECOMMENDATION**

### **OBSERVATION 1:**

The Agency's adherence to minimum federal standards for appropriate employment did not ensure that refugees achieved the stated goal of economic self-sufficiency.

### **Discussion:**

According to federal regulations, the State Plan must describe "how the State intends to encourage effective refugee resettlement and to promote economic self-sufficiency as quickly as possible." The federal requirements listed below are the primary mandates related to refugees receiving cash assistance and achieving economic self-sufficiency:

1. The individual must accept at any time, from any source, an offer of employment, *as determined to be appropriate by the State agency or its designee*. [emphasis added]
2. The appropriate work may be temporary, permanent, full-time, part-time, or seasonal work.
3. The job must be related to the capability of the individual to perform the task on a regular basis.
4. The individual may be exempt from accepting employment for one year if he or she has professional skills and is engaged in training programs to become re-licensed in his or her profession, but only if such training can be realistically expected to result in re-licensing.

According to the federal Office of Refugee Resettlement, economic self-sufficiency is defined as income above what one would receive

1. from Temporary Assistance for Needy Families (TANF, formerly known as ANFC or Aid to Needy Families with Children), or
2. from Refugee Cash Assistance alone (this does not include Medicaid, food stamps, or any other public assistance program).

According to the Department of Social Welfare, the levels of cash assistance available from TANF in 1998 were as follows.

Family of two: a maximum of \$554/month (\$6,648 annually).

Family of three: a maximum of \$657/month (\$7,884 annually).

Family of four: a maximum of \$737/month (\$8,844 annually).

According to the federal definition, families would be economically self-sufficient if their incomes exceeded the amounts listed above (in 1998). Table 1 below offers some comparisons to better understand the implications of the federal definition of "economic self-sufficiency" on employment and wages.

Table 1: 1998 Comparison of Annual and Equivalent Hourly Wages for State Public Assistance, Federal Poverty Levels, and the Estimated Livable Wage*			
Family Size	Public Assistance**	Federal Poverty Level	"Livable Wage"***
Two	\$6,648/yr. (\$3.20/hr.)	\$10,850/yr. (\$5.22/hr.)	\$28,989/yr. (\$13.94/hr.)
Three	\$7,884/yr. (\$3.79/hr.)	\$13,650/yr. (\$6.56/hr.)	\$33,328/yr. (\$16.02/hr.)
Four	\$8,844/yr. (\$4.25/hr.)	\$16,450/yr. (\$7.91/hr.)	\$32,407/yr. (\$15.58/hr.)

\* Assumes one full-time year-round wage earner.

**\*\* These figures represent the maximum amount a family could receive from Temporary Assistance for Needy Families (TANF). Incomes above these amounts would meet the federal ORR definition of economic self-sufficiency.**

**\*\*\* Source: Vermont Job Gap Study, Peace & Justice Center, 1998. Update of the basic needs budget and the livable wage. Figures represent urban families with one wage earner. Hypothetical families include one parent with one child, one parent with two children and two parents with two children. Estimated wages include employer-assisted health care benefits.**

**As seen in Table 1, the federal ORR standard for "economic self-sufficiency" was below the federal poverty level and considerably less than recent estimates of a "livable wage." Moreover, the equivalent hourly wages for "self-sufficiency" for all three family units were below the minimum wage of \$5.25 (the minimum rose to \$5.75 per hour on October 1, 1999). The narrow federal definition of self-sufficiency encourages a focus on quick, low-wage employment, rather than potentially skill-matched, higher-wage employment. Since State benefits do not bring individuals or families up to livable wages, such a definition does not translate into genuine economic self-sufficiency. Financial assistance, either directly or through subsidized programs, may be necessary to provide basic needs including adequate housing, childcare, and transportation.**

**During federal FY 1998, a total of 150 refugees served by VRRP were employed, most in full-time work (140, or 93 percent). Refugees in full-time employment made an average of \$6.92 an hour (\$14,394 annual income), while those in part-time employment made an average of \$5.57 an hour. These wages could not reasonably be considered adequate to achieve self-sufficiency and could result in families remaining eligible for other types of public assistance.**

**While VRRP is required to assist refugees with prompt job placement, it is not required to ensure the jobs are well matched with their skills and expertise. We could find no documentation that demonstrated an effort to match skill level with job placement. However, the exemption for those with professional skills is an acknowledgment that it makes sense to maximize the skills, education, and training of refugees. In the absence of an explicit prohibition, a State could and should choose to interpret the definition of "appropriate" employment to mean employment that takes advantage of prior experience or training in nonprofessional fields.**

### **RECOMMENDATION 1:**

**The Agency should amend the State Plan to define economic self-sufficiency for refugees as income sufficient to cover basic needs without recourse to public assistance.**

**The Agency should consider "livable wages" or some similar meaningful standard in developing an effective definition of "appropriate employment."**

**The Agency should require the Vermont Refugee Resettlement Program to place more emphasis on matching the skill and experience levels of refugees when locating "appropriate employment."**