

# A Roadmap to Rebuilding the U.S. Refugee Admissions Program

A Joint Initiative of the National Conference on Citizenship and the  
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## Executive Summary

# The Path To 125k Refugee Admissions

The U.S. Refugee Admissions Program (USRAP) is at a crossroads. Under the Trump Administration, years of assault on the program have slashed admissions to historic lows, effectively eviscerating a bipartisan tradition of extending a lifeline to the world's most vulnerable people. If a new president is sworn into office in January 2021, he will likely arrive with a mandate to significantly increase refugee admissions levels. This is commendable, but past experience shows that achieving higher admissions levels requires more than just setting a higher target. Any administration that seeks to significantly increase refugee admissions levels will need to be ready on Day 1 to begin not only rebuilding but significantly strengthening the program – designing a process that is more efficient, innovative, and humane for refugees and the communities across America welcoming them.

For a potential new administration taking office several months into Fiscal Year 2021 (FY21), this report finds that early and decisive actions to rebuild USRAP's core infrastructure would make it possible to meet the goal of increasing admissions from current historic lows to admit at least 50,000 refugees by the end of FY21, although a new administration should rightly set a higher target as a signal of political priority and commitment. This estimate assumes that resources necessary to scale admissions are conveyed in a new administration's conversations with Congressional leadership on budget priorities. **In Fiscal Year 2022 (FY22), this report determines that it will be challenging, but attainable, to meet a goal of admitting at least 125,000 refugees by investing in innovations that produce significant operational efficiencies.** Achieving this goal in FY22 and exceeding it in future years is only possible if the FY21 priority for all agencies involved in USRAP is building key medium-term infrastructure while restarting the pipeline. If agencies push for as high a FY21 number as possible at the expense of system-wide improvements, they will be unable to take key steps towards strengthening the program and sustainably enabling higher numbers in the future. These priority steps include:

**Issuing an Executive Order on Refugee Admissions and Protection on Day 1**, including:

- Revising the admissions target established in the Presidential Determination on Refugee Admissions for FY21;
- Rescinding Trump Administration policies that have undermined USRAP and wider U.S. refugee protection policy;
- Designating and empowering the appropriate senior-level White House National Security Council official responsible for driving interagency coordination;
- Re-establishing regional allocations for refugee admissions;
- Rebuilding referral pathways with UNHCR;
- Designating all nationalities for Priority 3 eligibility.

**Selecting individuals committed to effectively leading and empowering the professional staff of USRAP** for key political roles, including at U.S. Citizenship and Immigration Services (USCIS), the U.S. Department of State Bureau of Population, Refugees, and Migration, and U.S. Department of Health and Human Services Office of Refugee Resettlement, and directing the leadership of the vetting agencies, including the U.S. Department of Homeland Security, the Federal Bureau of Investigation, and other members of the Intelligence Community, to ensure that efficient and fair vetting is understood as part of their core missions.

**Directing an interagency effort to jumpstart the processing of refugees currently in the pipeline,** including:

- Strengthening the National Vetting Governance Board and leveraging it to immediately begin tracking of security check status and prioritizing backlogs across agencies;
- Deploying a U.S. Digital Service team to support the rebuilding of USRAP;
- Focusing interagency coordination on prioritizing the re-approvals of refugees who were previously interviewed;
- Coordinating with domestic resettlement agencies to enable them to scale-up their operations for new refugee arrivals.

**Driving major operational improvements to interviewing and vetting processes,** including:

- Convening a 60-day review of refugee security vetting led by the National Security Council to develop options to formalize interagency governance, consolidate vetting processes and technology on a modern system such as that of the National Vetting Center, and adjust methods and thresholds to best adapt to the changing threat environment by the start of FY22;
- Scaling up the capacity of the Resettlement Support Centers and USCIS Refugee Corps;
- Expanding the use of virtual interviews for less complex cases;
- Utilizing data to increase the customization of USCIS interviews based on the complexity of each case.

**Reviewing and adjusting USRAP operations to support the resumption of refugee admissions at scale in line with the best public health practices during the COVID-19 pandemic,** including:

- Supporting populations impacted by Trump Administration's suspension of USRAP (e.g., prioritizing the re-approval of expired security and medical checks for refugees whose admission was held up during the COVID-19 linked suspension of USRAP);
- Revising USCIS procedures to support a greater use of virtual interviews for follow-up interviews and hard-to-reach populations while planning ahead for the resumption of circuit rides when they can be resumed safely;
- Adjusting Resettlement Support Center operations to identify work that can be done remotely while maintaining the security of refugees' personal information;
- Ensuring pre-arrival health screenings continue to incorporate COVID-19 testing;
- Implementing a system of testing, tracing, and isolation for newly arrived refugees;

- Adjusting resettlement operations, including providing support to resettled refugees who have been heavily impacted by the pandemic economically, incorporating digital literacy as part of cultural orientation programs offered to newly arrived refugees, and ensuring continued funding for one-time connectivity costs for access to telehealth and school.

**Rebuilding and growing multiple referral pathways into the USRAP pipeline, including:**

- Strengthening UNHCR's overseas infrastructure for sourcing new referrals into the USRAP pipeline. In order for the U.S. to meet a high admissions target in FY22, UNHCR will need to refer at significantly higher than historical rates starting as early as the first half of FY21;
- Directing the State Department to issue a cable reminding posts of their authority to make Priority 1 referrals;
- Identifying groups of special humanitarian concern for Priority 2 eligibility.

**Expanding processing for refugees from the Western Hemisphere, including:**

- Reinstating the Central American Minors program with clear objectives;
- Working with the United Nations High Commissioner for Refugees to expand referral operations in Central America and Mexico.

USRAP has been so thoroughly weakened that incremental changes to ramp up admissions in the near-term will not be enough to ensure its long-term health and durability. Considerable innovation is required to reimagine the domestic resettlement system as a world-class model of successful refugee integration, including reorienting resettlement around long-term social and economic outcomes and launching a national private sponsorship program to expand community involvement. This work should be grounded in a durable base of bipartisan support that strengthens the program's resilience through new partnerships and effective communications at the local, state, and national level.

The COVID-19 pandemic presents both additional complexity to the challenge and urgency to the need. It is difficult to anticipate fully the worsening humanitarian circumstances that refugee populations will face in the coming years or the foreign policy priorities around refugee resettlement, so the implementation of these recommendations must remain flexible and resilient.

# Preface

## About the Project

This project was a joint initiative of the National Conference on Citizenship and the Penn Biden Center for Diplomacy and Global Engagement to identify concrete recommendations for innovations in refugee policy, personnel, process, and systems to reinvigorate U.S. humanitarian diplomacy, maintain the rigorous vetting of refugees, and securely increase refugee admissions multifold. The project was led by Ariana Berengaut and Eric Hysen from June to October 2020. The core team included Rosanna Kim, Lara Kohl, David Leftwich, Salma Mousa, and Sarah Saltiel. Consultants who provided additional guidance and support included Betsy Fisher, Rachel Landry, and Mary Beth Schmidt. Recognizing the complex operational challenges presented by USRAP, this team brought a cross-functional set of skills in policy, operations, human-centered design, data science, and software engineering.

This report presents the findings of the project and provides an operational roadmap for rebuilding and reimagining USRAP starting in 2021. The project's exclusive focus on USRAP meant that several important areas fell outside its scope, including asylum policy and complementary pathways for refugee admissions. This report is designed to complement the work being undertaken by other peer organizations to focus on these priorities.

## Methodology

This report is based on more than 100 consultations and interviews with a range of experts and stakeholders who have been involved in shaping policy, implementing operations, and/or advocating for USRAP. This group included former Obama and Trump Administration officials, former career Federal employees with decades of experience administering USRAP, staff from the national and local offices of all nine of the domestic resettlement agencies, representatives from the refugee advocacy community, and most importantly, a diverse group of refugees, who generously shared their experiences resettling in the U.S. through USRAP. With their permission, this report includes their direct quotations to help center several of the recommendations in this report around their perspectives. The qualitative research that informed this report drew upon the best practices of human-centered design to ensure the report's recommendations reflected the needs, challenges, and opportunities of refugees and their families. This included using techniques such as journey mapping to synthesize and present the report's findings from the viewpoints of refugees.

The report is also based on quantitative research that analyzed a variety of data sources, including publicly available data from the U.S. government and media reporting, to establish a working assessment of the current status of the USRAP pipeline. This assessment included identifying the refugee populations currently in the pipeline, analyzing the main barriers to processing, and modeling the impact of proposed recommendations as measured against refugee admissions targets and pipeline health. This modeling informs the prioritization of recommendations throughout the report.

## Acknowledgements

We are very grateful to the Open Society Foundations for their support that made this project possible and to the International Refugee Assistance Project, Refugee Council USA, and Refugee Congress for their generosity in closely collaborating on this project, including sharing their expertise and networks. We are also deeply grateful to all those we spoke with over the course of researching and preparing this report – your comments, feedback, and insights were invaluable.

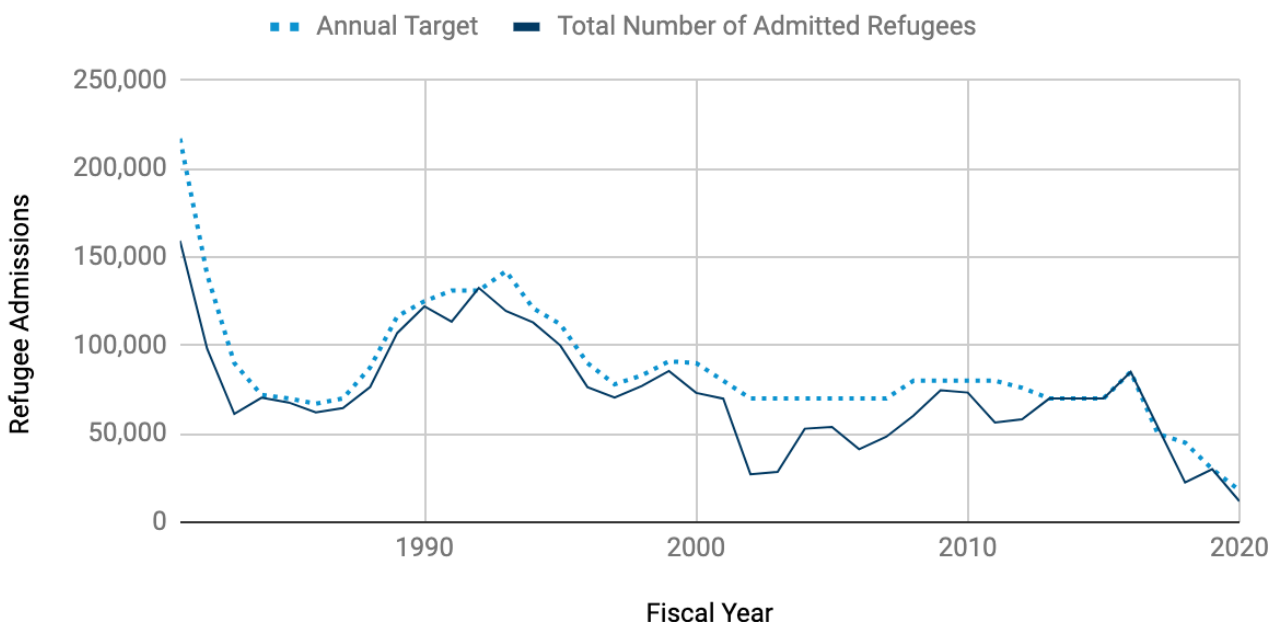
# Introduction

## The Challenge

**Over the past four years, the Trump Administration has pursued unprecedented reductions in U.S. refugee admissions with a demonstrated intent to decimate USRAP.** The Trump Administration has rolled back the U.S.' historic commitments to refugee resettlement, pursuing a drastic decrease from the Obama Administration's highest admissions target of 110,000 in FY17 to 45,000 in FY18, 30,000 in FY19, 18,000 in FY20, and 15,000 in FY21. In FY20, only 11,814 refugees were resettled<sup>1</sup> – the lowest number of refugees admitted through the program since its founding in 1980 (see figure below). In contrast to the Trump Administration's significant cuts, the Biden for President campaign has committed to increasing the refugee admissions target to 125,000<sup>2</sup> (amounting to an over 700% increase compared to the current FY21 target). Under the Obama Administration, an intensive implementation effort was required to achieve an increase in refugee admissions from 70,000 in FY15 to 85,000 in FY16 and to significantly expand Syrian refugee admissions. This experience suggests that a new administration will need to go further in exploring major operational innovations to USRAP to rebuild the program.

## Annual Refugee Admissions Targets and Refugee Arrivals

Fiscal Years 1980-2020



Source: Migration Policy Institute<sup>3</sup>



## The Vision

**To address this challenge, this report provides a roadmap for how to rebuild USRAP to achieve a rapid increase in refugee admissions in the near-term and put the program on stronger footing over the long-term.** While the immediate focus for a new administration will be on securely delivering higher numbers of refugee admissions, this short-term goal should not detract from the need to reimagine USRAP for the future. Simply returning to the version of USRAP that existed prior to the Trump Administration would fail to address the systemic operational challenges that the program has faced in the forty years since its creation and pass up a critical opportunity to modernize the program to meet the evolving demands of the next forty years. On this basis, this report offers an ambitious but achievable vision of a stronger USRAP in accordance with four principles.

- 1. USRAP should have the operational capability to securely, consistently, and sustainably process and receive higher levels of refugee admissions.** To respond to growing global resettlement needs and the widening resettlement gap, a new administration should re-establish the U.S. as the world's largest resettlement country and set the ambition of admitting higher numbers of refugees over time. However, to achieve this, USRAP must have the systems and processes in place to make large-scale refugee admissions a matter of institutionalized practice. This means modernizing and strengthening existing infrastructure to ensure that USRAP can source referrals and process higher numbers safely and efficiently without being reliant on the unsustainable dedication of high-level political attention and resources to drive increased admissions.

For a new administration taking office several months into FY21, early and decisive actions to rebuild USRAP's core infrastructure would make it possible to meet the goal of increasing admissions from current historic lows to admit at least 50,000 refugees by the end of FY21 (though a new administration should rightly set a much higher target as a signal of political priority and commitment). In FY22, it will be challenging, but attainable, to meet a goal of admitting at least 125,000 refugees by investing in innovations that produce significant operational efficiencies. In the years to follow, these investments will create the necessary foundation for further reforms that will enable USRAP to annually process more than 125,000 refugees in line with increased U.S. refugee admissions targets.

- 2. USRAP should maximize opportunities for newly arrived refugees to not only survive, but thrive as they rebuild new lives in the U.S. and successfully integrate into U.S. society as new Americans.** A new administration should look to not only grow the size of our resettlement program, but to improve the quality of the program in delivering positive long-term outcomes for refugees and their families. Despite the numerous challenges that refugees face in adapting to their new lives in resettlement countries, there is a growing evidence base from academic and policy research that finds that with early and significant investment, refugees often become self-sufficient and productive members of their new home countries while also producing significant economic and demographic benefits for their resettlement communities

over multiple generations.<sup>4</sup> However, the current design of the domestic resettlement model under USRAP is primarily focused on positioning refugees to secure early employment, rather than realizing the full potential of refugees to successfully and meaningfully integrate into the economic and social fabric of U.S. society over the long-term. By investing in and strengthening domestic resettlement capacity and building on the program's accomplishments to drive new innovations in FY21 and FY22, USRAP could become an even more powerful engine of successful refugee integration – in turn, further strengthening the case for refugee admissions in the years to come.

- 3. USRAP should have the operational flexibility to quickly stand-up new resettlement pathways as part of the wider U.S. response to protracted crises.** However, USRAP is not currently equipped to serve as a tool that the U.S. can effectively use to address the urgent demands posed by such crises. The current system takes several years to establish refugee processing for new populations at scale, falling short on both our moral obligations and the foreign policy imperative of responding quickly to displacement emergencies, demonstrating responsibility-sharing with frontline countries, and securing early commitments on refugee protection. By investing in major operational innovations in FY21 and FY22, a new administration will be laying the groundwork to modernize USRAP for the future so that it could be deployed in a matter of months, rather than years, to respond to new crises that demand U.S. action.
- 4. USRAP should be grounded in a durable base of bipartisan support to strengthen the program's resilience to future attempts to politicize and undermine it.** In the four decades since its establishment, USRAP has proven to be a remarkably successful program that has advanced the national interest of the United States and enriched the diversity of our country. The extreme hostility to USRAP that has marked the Trump Administration's tenure represents a significant outlier from the long history of bipartisan support that has defined the program, underscored by the sound refusal of a majority of U.S. governors to block refugee resettlement in their states when given the chance by President Trump. A new administration should advocate for the program from a position of confidence – opposition to refugee admissions is based on politically motivated fearmongering and misinformation that is inconsistent with the merits, facts, and proven track record of the program. But such support cannot be taken for granted; it must be continuously fostered and strengthened at local, state, and national levels through expanded partnerships and effective communications that build both top-down and bottom-up support by making the case for the humanitarian and strategic imperatives of the program and engaging more Americans in welcoming refugees in their communities.

## Plans of Action

**To achieve this vision for USRAP, this report details four plans of action – identifying the most critical and potentially transformational reforms in policy, personnel, processes, and systems – that a new administration should prioritize to rebuild and modernize USRAP.**

**First, drive major operational improvements to address long-standing barriers that hamper USRAP's ability to securely and efficiently process refugees at scale.** Even prior to the Trump Administration, USRAP was not able to rapidly admit significant numbers of refugees due to processes that were highly susceptible to bottlenecks and in need of modernization. This includes overseas processing procedures facing significant backlogs, an unnecessarily inefficient system of security vetting that has been built up over the past decades, and reliance on limited sources of referrals. A new administration should prioritize reforms to drive improvements in USRAP's core operations that will grow refugee admissions in the near-term and create a foundation for sustaining increased admissions in the future.

**Second, adapt USRAP to be more responsive to the challenges posed by growing refugee flows across the Western Hemisphere.** Refugee admissions from the Western Hemisphere have historically been a small component of USRAP despite growing refugee flows across the region over the past decade. Continued violence and insecurity in the Northern Triangle is fueling increased displacement while the deterioration of the political situation in Venezuela is driving the largest displacement of persons in Latin America in recent history – with the rate of refugee outflows set to outpace what was seen in Syria in 2011. In addition, political and social unrest in Nicaragua has also continued to produce significant refugee outflows. In response, a new administration should adapt USRAP to better demonstrate U.S. commitment commensurate with our responsibility and role in the Western Hemisphere.

**Third, introduce innovations to improve the integration outcomes of resettled refugees.** The Refugee Act of 1980, the landmark piece of legislation that established USRAP, created the public-private partnership model upon which the program is based today – where a formal network of nine highly professionalized domestic resettlement agencies (RAs) are contracted by the State Department to provide resettlement services to newly arriving refugees. This approach has gone largely unchanged in the forty years since the program's creation, with a predominant focus on mandating RA compliance with a rigid set of requirements geared around delivering short-term economic outcomes within 90–180 days. While resettled refugees in the U.S. have proven resilient under this model, many continue to struggle with long-term integration. This moment of rebuilding is an opportunity to introduce much needed reform and incentivize a stronger focus on improving refugee outcomes beyond early economic self-sufficiency.

**Fourth, create opportunities to involve a broader range of community actors in resettlement to grow a durable domestic constituency that supports resettlement.** A new administration will need to invest in rebuilding the professionalized network of RAs that has been diminished under the Trump Administration. But while the RAs have cultivated deep, specialized expertise on refugee resettlement and delivered critical services, their role as the primary organizations interfacing with resettled refugees has meant that a smaller range of community actors have had exposure to USRAP compared to the years preceding the Refugee Act. For example, most notably during the 1970s, U.S. families, church groups, and community organizations were the primary recipients of Indochinese refugees. Arguably, this dynamic has contributed to a weakening of public support for USRAP – as evidenced by the lack of a strong constituency to voice opposition against the Trump Administration’s decimation of the program. A new administration should think creatively about how to broaden and deepen public support for USRAP by involving additional community actors, beyond the RAs, in resettlement efforts.

**Across these four plans of action, a new administration should ensure that its efforts to scale up admissions do not detract from a commitment to USRAP’s primary objective of providing humanitarian protection for the most vulnerable.**

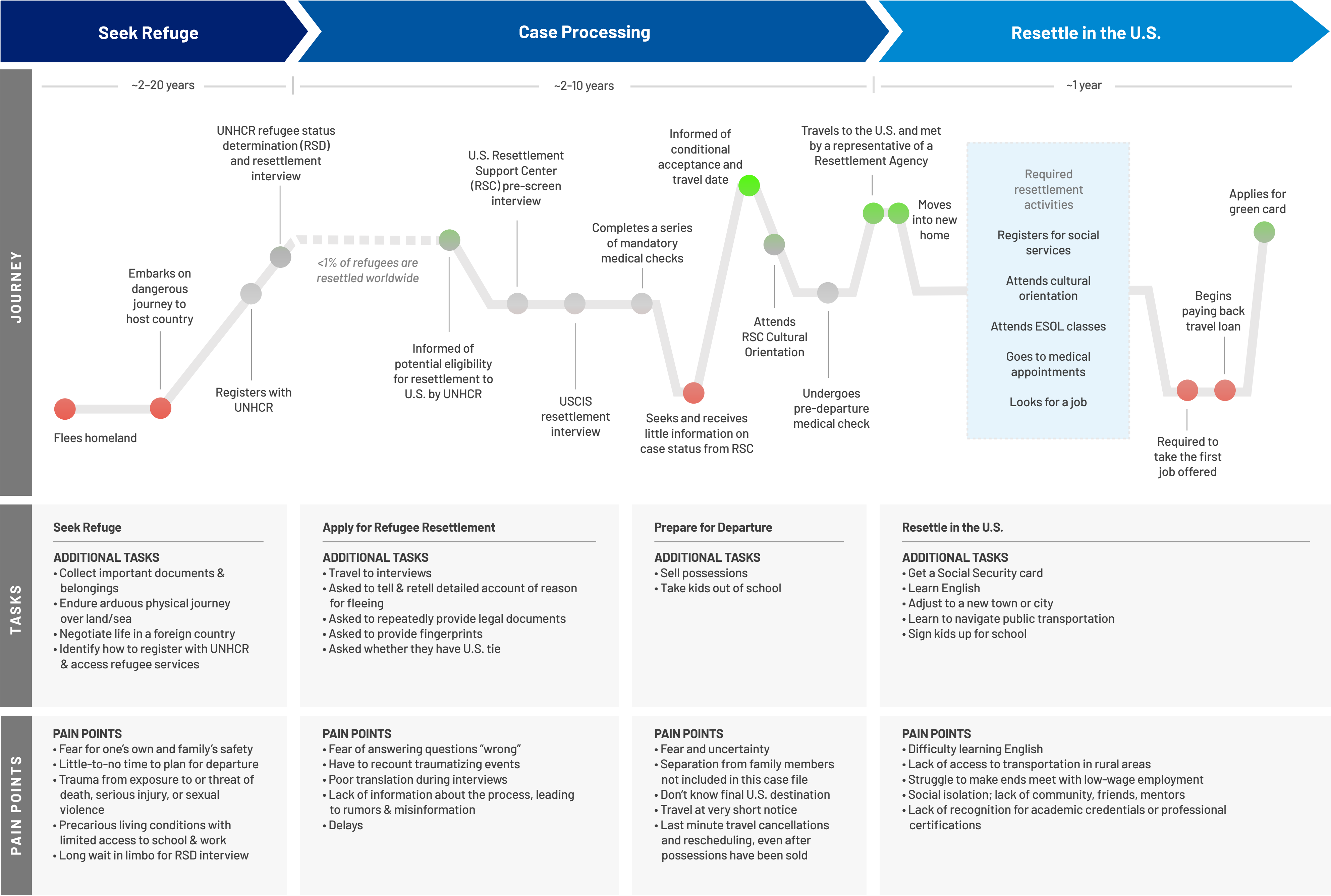
**This report proposes a series of high-level recommendations organized by time frame and priority.** The first section of the report outlines a set of actions to prioritize in the first 100 days of a new administration to signal early high-level political re-commitment to USRAP and immediately start to mobilize the key government agencies and stakeholders. The following sections of the report set out recommendations in order of priority. For each recommendation, the paper identifies steps to take within the first six months of an administration to rebuild core infrastructure and efficiently process existing cases in the USRAP pipeline; actions to take within the first year to enable a scale-up of operations across USRAP in preparation for meeting the FY22 target; and actions that can be pursued in future years to continue driving systemic reforms to USRAP.

**These recommendations are also grounded in the experiences of resettled refugees, incorporating their perspectives about each stage of the USRAP process.** Recognizing that refugees are the most critical stakeholders of USRAP, this report is informed by the lived experiences of 12 individuals who have been resettled through USRAP from various countries and at different times, with a majority having arrived in the past 10 years. The journey map on the next pages provides an overview of the USRAP process end-to-end from the vantage point of refugees, including a summary of some of the key insights and challenges that emerged from refugees’ experiences that informed many of the recommendations throughout this report.

# Journey Map

## The U.S. Refugee Admissions Program from the Perspective of a Refugee

This map reflects the typical experience for a UNHCR-referred refugee; the steps vary, particularly during processing, for some refugee populations.



# First 100 Days Agenda

## Issue an Executive Order on Refugee Admissions and Protection on Day 1.

A new administration should reestablish U.S. commitment to USRAP by reversing the policy and operational decisions taken by the Trump Administration that have decimated the program's core operations. The Executive Order (EO) should include the following actions:

- **Repeal and reverse policies by the Trump Administration that have undermined USRAP and wider U.S. refugee protection policy.** These policies include the discriminatory Muslim, asylum, and refugee bans based on ethnicity and nationality, the Department of Justice rulings that have narrowed the definition of asylum, the Asylum Cooperative Agreements with the Northern Triangle countries that have limited the ability of asylum seekers to claim asylum in the U.S., the executive order giving state and local authorities power to veto local resettlement, and the removal of complementary forms of protection for specific populations (e.g., Temporary Protected Status for Venezuelans).
- **Designate the appropriate senior-level official on the White House National Security Council (NSC) to drive interagency coordination.** This position should be empowered to work closely with White House staff leading on immigration policy to ensure that U.S. domestic policy resets on immigration reinforce early efforts on restoring U.S. commitments on refugee protection.
- **Revise the Presidential Determination (PD) on Refugee Admissions for FY21.** A new administration should send a strong high-level signal of U.S. ambition to restore and scale up USRAP by revising the PD to set a higher refugee admissions target. The revision should also address Trump Administration policies that constrained and slowed refugee admissions by including provisions that:
  - **Re-establish regional allocations for refugee admissions.** As part of the FY20 PD, the Trump Administration replaced the traditional system of regional allocations with a set of narrower category-based allocations and made it more difficult for the State Department to reallocate slots that would go unused. As a result, thousands of cases that do not align with the new more restrictive categories have stalled.
  - **Reinstate or restore processing for pre-defined Priority 2 (P-2) group categories.** As part of the FY20 PD, the Trump Administration removed ethnic minorities and refugees from Myanmar and Congolese refugees in Rwanda and Tanzania from pre-defined P-2 group access categories – raising uncertainties around whether the 26,000 Congolese refugees and 6,200 Myanmar refugees currently in the pipeline are being processed.<sup>5</sup> In addition, the

Iranian Lautenberg program has been at a standstill since January 2017, when, on rumors that the Administration would pause all refugee admissions, the Government of Austria stopped issuing visas to allow Iranians to travel for processing.

- **Resume accepting resettlement referrals from the UN High Commissioner for Refugees (UNHCR).** In its Report to Congress on Proposed Refugee Admissions for FY20, the Trump Administration announced that it would no longer accept resettlement referrals from UNHCR with limited exceptions for religious minorities and individuals from the Northern Triangle countries.
- **Designate all nationalities, including stateless persons, for Priority 3 (P-3) eligibility.** P-3 allows refugees and asylees in the U.S. to apply to reunite with their parents, spouses, and minor children who are also refugees. Eligibility, however, is limited to those nationalities designated each year by the State Department. The Bureau of Population, Refugees, and Migration (PRM) should expand P-3 nationality to all include refugees of all nationalities, including stateless people (currently, stateless people from designated countries are not eligible – meaning that relatives of Rohingya are not eligible although Burma is listed). It should allow parents of Afghan and Iraqi Special Immigrant Visa (SIV) recipients to be P-3 eligible. It should also suspend the five-year deadline by which a refugee must apply for their relative. Finally, it should ensure that refugee families whose ties are not currently recognized due to limitations on access to civil registration, restrictions on same-sex marriage, or restrictions on legal adoptions are eligible.
- **Raise the Latin America and Caribbean (LAC) regional allocation cap beyond historic levels as part of a revised FY21 PD and convene an interagency process to identify the role refugee admissions should play as part of the wider U.S. response to migration flows across the region.** While refugee flows have significantly increased across the LAC region in the past decade, the size of the LAC regional cap for refugee admissions to USRAP has remained largely stagnant over the same period. Under the Obama Administration, the average size of the LAC regional cap was roughly 4,400 with projected arrivals consistently falling significantly short (in FY16, a cap of 3,000 was set with only 1,500 refugees projected to arrive).<sup>6</sup> A new administration should significantly raise the regional LAC cap for admissions as an early demonstration of U.S. commitment to addressing the magnitude and severity of protection needs in the region, particularly in response to refugees fleeing the Northern Triangle countries and Venezuela. Subsequently, as part of the wider U.S. response to migration flows across the region, an interagency process should establish a clear strategy for how to realize an increase in refugee admissions from LAC countries.

## Nominate individuals committed to effectively leading and empowering the professional staff of USRAP.

A new administration should nominate individuals to cabinet-level positions, including the Secretary of State, Secretary of Health and Human Services, Secretary of Homeland Security, who recognize the critical work their respective departments play in supporting USRAP and are committed to the intensive efforts that will be required to meet increased refugee admissions targets. Additionally, a new administration should communicate early and regularly with the new leaders of the Intelligence Community regarding the important roles they play in supporting USRAP. Further, a new administration should engage leadership at the Department of Defense in discussions on USRAP, given its critical role in advocating for the U.S. to live up to its resettlement obligations Afghans and Iraqis at risk due to their work with U.S. military forces.

Most importantly, a new administration should ensure that the individuals nominated and appointed to key leadership roles in the key bureaus and offices have deep experience with refugee admissions and are committed to rebuilding USRAP through significant reforms and innovations that will challenge current ways of working. Critical positions include the Director of USCIS at the Department of Homeland Security (DHS), the Assistant Secretary of PRM at the State Department, and the Director of the Office of Refugee Resettlement (ORR) at the Department of Health and Human Services (HHS).

## Work with the U.S. Congress to rebuild bipartisan support and pursue legislative reforms that would strengthen USRAP.

A new administration can leverage the recent resurgence in domestic support for refugee resettlement in reaction to the Trump Administration's policies, as evidenced by public opinion polling<sup>a</sup> and the response of governors (including a majority of Republican governors) and local officials in re-affirming their states and cities' willingness to take in refugees.<sup>b</sup> The following actions should be prioritized in congressional engagement:

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<sup>a</sup> According to a September 2019 survey conducted by the Pew Research Center, 73% of Americans said that "admitting refugees escaping war and violence" was "a very important" or "somewhat important" goal – compared to 61% in 2016. This increase was driven largely by shifting views among Republicans. 43% of Republicans said admitting refugees should be a "somewhat important" goal in the 2019 survey, up from 28% in 2016. See Andrew Daniller, "Americans' immigration policy priorities: Divisions between – and within – the two parties," Pew Research Center, November 12, 2019, <https://www.pewresearch.org/fact-tank/2019/11/12/americans-immigration-policy-priorities-divisions-between-and-within-the-two-parties/>.

<sup>b</sup> In September 2019, President Trump issued an executive order that required state and local elected leaders to affirmatively consent to participating in USRAP. In response, 42 states (including 19 Republican-led states out of 26) and more than 100 mayors announced that they would continue to resettle refugees.



- **Establish institutional safeguards for USRAP**, including setting an annual refugee admissions floor of no less than 95,000 refugees, reflecting the historic average of admissions goals set by presidents from both political parties from 1980 to 2017, as proposed in the Refugee Protection Act introduced in 2019 (S. 2936/H.R.5210). Additional safeguards for USRAP could include provisions that ensure that the PD factors in global resettlement needs and that mandate the automatic designation of the established refugee floor as the admissions ceiling, in the absence of a PD being issued before the beginning of a new fiscal year.
- **Permanently fund USCIS' humanitarian programs through budget appropriations.** Currently, funding for USCIS' work administering refugee admissions (and other humanitarian programs) relies on fees for immigration and naturalization benefits. This undermines both the refugee program's financial stability and our government's moral and strategic responsibility to ensure the program's healthy and continuous operation.
- **Increase the scale and scope of resettlement support** by securing support for budgets that will sufficiently fund the overseas and domestic infrastructure of USRAP and increase the scale and scope of resettlement services necessary for successful integration.

Direct an interagency effort to jumpstart the processing of refugees currently in the USRAP pipeline, including:

- **Establish a shared understanding of the current state of the pipeline.** The numerous U.S. government departments and agencies involved in USRAP processing do not have a common understanding of the source of several bottlenecks that have stalled processing. PRM should combine data from other agencies with its own information to establish a shared understanding of pipeline status, including major blockers, key populations who have been "left in limbo" for numerous reasons (such as lapsing medical checks), and priority areas to dedicate staff and resourcing to kickstart processing.
- **Convene an interagency process through the NSC to conduct an immediate review of refugee security vetting.** This review would evaluate the current system of refugee security vetting, including the additional security checks and restrictions introduced by the Trump administration, and assess them against a set of criteria for effective, efficient, and accountable security checks. This review would form the basis for exploring areas of reform to streamline and strengthen the vetting system.
- **Deploy a U.S. Digital Service team to support the rebuilding of USRAP.** The U.S. Digital Service (USDS) is a technical team headquartered at the White House that provides support to the most critical technical problems in the federal government. The technology and coordination efforts that USDS provided in 2016 were vital in supporting the program during a surge.

This expertise will be necessary in partnership with key career officials at PRM and USCIS as a new administration jumpstarts a stalled process. Additionally, PRM and USCIS are in the process of deploying new systems to support USRAP. Managing a rapid scale-up of admissions alongside the roll-out of new systems will be challenging. It will be important for new systems to be monitored closely by PRM, USCIS, and USDS to ensure that challenges do not delay pipeline progression.

- **Focus interagency coordination on prioritizing the finalization of security checks for refugees who were previously interviewed**, including the growing number of refugees who have been “stuck” in the pipeline due to the new category-based allocation system introduced in the FY20 PD. Tens of thousands of refugees who have been interviewed and conditionally approved by DHS have been left in a perpetual state of uncertainty and instability, especially since refugees identified for U.S. resettlement are typically not considered by other resettlement countries.<sup>7</sup> The Trump Administration's policies have disproportionately impacted several populations that were already affected by extensive delays in processing, including Security Advisory Opinion (SAO) nationals, P-3 applicants, I-730 applicants, Iranian Lautenberg applicants, and Iraqi P-2 applicants in Iraq. Since 2017, the security approvals have also lapsed for many of these refugees, making them unqualified to travel on Day 1.
- **Coordinate with domestic RAs to enable them to scale-up their operations for new refugee arrivals.** RA resettlement staff have estimated that 2 weeks would be the minimum amount of notice they would need to prepare before the start of new arrivals with the ideal amount of notice being 3 months. PRM should also take the following actions to ensure RAs have the means necessary to quickly scale-up:
  - **Extend COVID-19-related adjustments to maximize flexibility.** This past summer, due to COVID-19, PRM revised its requirement that local offices must serve a minimum of 100 refugees (or 50 refugees in the case of offices that are in locations where there are no other affiliate offices within 50-100 miles) – lowering it to minimum of 50 refugees for all offices. PRM should extend this adjustment through at least the end of FY22.
  - **Amend PRM's cooperative agreements with RAs to support the increased admissions target of a FY21 PD.** PRM will need to consider revisions to the cooperative agreements that take into account the immediate financial pressures and constraints faced by RAs. For instance, as appropriations permit, PRM should extend emergency COVID-19 funding for RAs to serve refugees who need more than 90 days to secure employment and access government benefits<sup>c</sup> and provide a portion of Reception and Placement funding (R&P)

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<sup>c</sup> According to a survey conducted by all nine RAs in early May 2020, nearly 50% of newly arrived refugees and SIVs surveyed indicated they would not be able to pay their May rent without assistance. At the same time, 76% of clients who applied for Pandemic Unemployment Assistance reported long delays or unwarranted rejections. Many Social Security Offices were closed for in-person visits and without social security authorization documents, refugees could not access other benefits such as the Supplemental Nutrition Assistance Program (SNAP), WIC, and relief from the CARES Act.

covering administrative costs to resettlement offices up front to enable RAs to train and hire additional staff and expand the capacity of existing offices while they await new arrivals. PRM should consider consistently providing resettlement agencies with a sufficient percentage of administrative budget (50% or more) at the start of the fiscal year so they can plan for and be prepared for new arrivals, rather than distributing those funds at the time of service.

## Review and adjust USRAP operations to safely process refugees in line with best public health practices during the COVID-19 pandemic.

In early March, UNHCR and the International Organization for Migration (IOM) announced a temporary suspension of all travel for refugees approved for resettlement. In response, the Trump Administration implemented a temporary suspension of refugee admissions, which was ultimately lifted in July after UNHCR and IOM resumed their operations to support refugee travel in June. However, the pandemic has still constrained several critical aspects of USRAP processing. For instance, USCIS suspended all circuit rides for Refugee Officers in mid-March, and currently there is little clarity over when they could be safely resumed.

Early interagency coordination and consultation with public health experts will be necessary to produce a clear operational plan to flexibly adjust USRAP's operations to safely support the resumption of refugee admissions at scale. Key actions will include:

- Supporting populations impacted by Trump Administration's suspension of USRAP (e.g., prioritizing the re-approval of expired security and medical checks for refugees whose admission was held up during the COVID-19 linked suspension of USRAP);
- Revising USCIS procedures to support a greater use of virtual interviews when appropriate and planning ahead for the resumption of circuit rides when they can be conducted safely;
- Adjusting Resettlement Support Center (RSC) operations to identify work that can be done remotely while maintaining the security of refugees' personal information;
- Ensuring pre-arrival health screenings continue to incorporate COVID-19 testing;
- Implementing a system of testing, tracing, and isolation for newly arrived refugees;
- Adjusting resettlement operations, including providing support to resettled refugees who have been heavily impacted by the economic impact of the pandemic, incorporating digital literacy as part of cultural orientation programs offered to newly arrived refugees, and ensuring continued funding for one-time connectivity costs for access to telehealth and school.

## Plan of Action #1

# Driving Major Operational and Processing Improvements

USRAP relies on a series of screening and processing procedures carried out by multiple U.S. government departments and agencies, including the State Department, DHS, and several intelligence agencies. Prior to the Trump Administration, the admissions process was already lengthy (taking, on average, 18 to 24 months for a refugee to complete from the time of initial pre-screen to arrival) and the rate of admissions was often unpredictable (typically requiring a surge of effort at the end of the fiscal year to meet refugee admissions targets). These inefficiencies have been further compounded by the Trump Administration. Without significant operational reforms to overseas processing, security vetting, and the system of referrals, it will be extremely difficult for a new administration to meet the immediate goals of admitting significantly higher numbers of refugees in FY21 and FY22.

These reforms will build on a program that has consistently maintained the highest levels of security and integrity. Refugees undergo more rigorous screening than any other person entering the U.S., and improvements to the process have informed vetting procedures for other categories of U.S. arrivals. This report's recommendations will enable increased efficiency without compromising these stringent security and integrity standards.

### Recommendation 1.1

## Improve the efficiency of overseas processing to facilitate refugee admissions at much greater scale.

### The Department of Homeland Security

There is a backlog of at least 50,000 cases awaiting USCIS attention, representing a sizable portion of the overall USRAP pipeline.<sup>d</sup> Processing this backlog expeditiously will require hiring additional USCIS Refugee Officers and reforming the USCIS interview and adjudication process to decrease the average time spent conducting interviews while increasing the time and resources allocated for the most complex cases. Because USCIS is a fee-funded agency and refugee admissions do not bring in any revenue, there will always be an upper limit to the number of

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<sup>d</sup> This reflects a rough estimate by former government officials and outside experts interviewed over the course of this project.

Refugee Officers that USCIS can hire, absent new appropriations. At a certain point, the interview process must become more efficient to sustain a significantly higher number of admissions.

Refugee Officers are deployed on overseas circuit rides to conduct interviews to determine a refugee's eligibility for resettlement. Officers verify the applicant's identity, evaluate security concerns, and establish the applicant's refugee claim. This interview and adjudication process does not systematically take into account the levels of complexity presented by different populations, requiring USCIS officers to spend hours re-establishing past persecution or well-founded fear and often unnecessarily re-traumatizing refugees as they are questioned on their history. In total, these interviews can take between two to four hours depending on the complexity of a given applicant's background. Expanding existing practices using data-driven approaches to inform the ways in which USCIS conducts interviews would help streamline the interview process while also strengthening the integrity of USRAP by enabling Refugee Officers to direct greater attention to more complex cases.

## Months 1–6

- **Increase the capacity of the USCIS Refugee Corps.** Due to hiring freezes and shifting staff allocations between the Refugee and Asylum offices, the capacity of the Refugee Corps has been diminished since the beginning of 2018. Even at peak operating capacity in FY16 and FY17, USCIS did not have enough officers available to process 85,000 refugees and relied heavily on secondments of staff from the Asylum Corps, the Office of the Chief Counsel, and other USCIS offices, depleting other USCIS programs of needed resources. With the immense needs for both Asylum and Refugee Officers in the field, relying on staff transfers will be inadequate. A new administration will need to immediately prioritize rebuilding and scaling up the size and operations of the Refugee Corps commensurate with increased ambition for processing higher numbers of refugees in FY21 and FY22.
  - **Streamline hiring of Refugee Officers by utilizing all available federal hiring flexibilities and authorities.** Currently, it takes approximately 4 months between the time a hiring need is identified to the extension of an informal offer for a candidate from outside the federal government. After completing lengthy security checks, medical checks, and training, a new hire would not be a productive Refugee Officer until three to four quarters after the hiring need was identified. Utilizing available federal hiring flexibilities and authorities (including Direct Hiring Authority) will allow for the Refugee Corps to more rapidly grow. USCIS should also further draw on federal hiring best practices, including having dedicated talent staff, continuous recruiting, and simplified application processes, to decrease process times for hiring and onboarding. Specific actions to improve the hiring process and increase retention of Refugee Officers can be found in the Annex.

- **Create a systematic process to assign junior officers to less complex cases and senior officers to more complex cases.** The USCIS International and Refugee Affairs Division uses the Refugee Officer Scheduling System (ROSS) to plan circuit rides and schedule interviews based on a set of criteria.<sup>8</sup> To make the best use of resources and allow new officers to ramp-up with simpler cases, the most experienced officers should be assigned to more complex cases and less experienced officers should be assigned to less complex cases. If possible, this consideration should be applied to the criteria used by ROSS to assign cases.
- **Expand the use of virtual interviews for follow-up interviews and hard-to-reach populations.** Tens of thousands of refugees who have completed an initial USCIS interview are being held in the process because information in the case requires clarification. Due to the limited circuit-ride schedule and travel restrictions as a result of COVID-19, refugees requiring follow-up have been unable to progress to travel. Authorizing USCIS to conduct follow-up interviews virtually would allow the backlog to be decreased and refugees to progress to the United States. While maintaining the integrity of the vetting process, USCIS should explore flexibilities to conduct minimum required activities in-person (such as identity verification) and identify opportunities to overcome operational challenges whenever it is more efficient to virtually conduct interviews, including for hard-to-reach populations, such as Iraqi P-2 applicants, and smaller groups that may not justify an entire circuit ride.
- **Resume processing of Iraqi cases from the P-2 Iraqi Direct Access Program (DAP).** Following the closure of the Iraqi SIV program in September 2014, Iraqis who supported U.S. military activities in Iraq have only been able to access USRAP by applying through DAP. Over 100,000 Iraqis are currently stuck in the USRAP pipeline and are waiting at different stages of the process – some for more than 10 years.<sup>9</sup> Security considerations in Iraq have limited the ability of USCIS to conduct interviews, with recent embassy shutdowns having stopped interviews completely. However, even accounting for historically low PDs under the Trump Administration, processing of this population has been unreasonably poor. A new administration should direct attention on processing this backlog by utilizing virtual interviews and other remote processing tools.

## Months 6–12

- **Expand the customization of USCIS interviews to increase efficiency by leveraging casework documentation and demographic data to focus the interview based on the complexity presented by each case.** Within USCIS interviews, Refugee Officers confirm access and identity of a refugee, determine if the refugee meets the U.S. definition, and identify potential security concerns. Interviews are currently scheduled for different lengths of time based on RSC location (i.e., interviews in Africa are generally faster than those in the Middle East). That customization, however, is not a consistent formal mechanism and does not account for other demographic factors or information available in their casefiles.

- **USCIS should identify group populations with similar claims that are less complex and develop a streamlined interview process.** With a focus on refugee populations that have significant presence in the current pipeline and very similar claims, Refugee Officers can eliminate the need to establish well-founded fear with each individual USCIS interview. This approach has been done before, a previous 2017 USCIS pilot approved for conditional adjudication of Kurdish refugees.
- **Continue expanding the use of virtual interviews for low complexity cases.** Where the technological infrastructure would support virtual interviews, USCIS should conduct virtual interviews with candidates with low-complexity cases to decrease the waiting time between circuit rides and save limited travel resources.
- **Reopen overseas USCIS offices that have closed since 2017.** Two-thirds of USCIS international offices have recently been closed, hindering regional processing outside of circuit rides.<sup>10</sup> Overseas offices are responsible for adjudicating petitions and applications, providing public information services, issuing travel documents, and generally supporting USRAP processes, including processing Follow-to-Join applications.<sup>11</sup>
- **Launch streamlined processing to demonstrate commitment to significant populations whose resettlement has stalled.** Once circuit rides resume, USCIS should launch surge operations for populations that have been stuck in the pipeline. Following single-site processing protocols used during a 2016 site in Jordan, new sites could be set up to quickly process refugee applicants. Interviews with former officials suggest that the Congolese and South Sudanese population could be target populations for a streamlined processing effort. These populations have a historically high acceptance rate and low processing time but have not traveled in meaningful numbers due to current PD categories and a lack of dedicated screening resources.

## Years 2–4

- **Institutionalize a rules-based system for customizing USCIS interviews according to case complexity with expanded parameters beyond country of origin.** This could alleviate the need for multi-hour interviews in some cases, allowing for a significant increase in the number of interviews a Refugee Officer could conduct per day. Over time, the goal should be to implement a broad rules-based system using a data model to enable classifications of complexity level given different factors, ultimately tailoring the USCIS interview to the complexity presented by each case without establishing a presumption of exclusion for any group.

The Immigration and Refugee Board of Canada presents an example of what such a system might look like when further developed (see table below). The Canadian system tiers categories of cases for simplified hearings or file review processes based on specific persecution claims and country of origin.

<b>Immigration and Refugee Board of Canada – Less Complex Claims</b>		
<b>Country of Origin</b>	<b>Review Requirements</b>	<b>Claim Type</b>
<b>Iran</b>	File review (no hearing required)	<ul style="list-style-type: none"> <li>• Particular social group</li> <li>• Gender/age</li> <li>• Female gender norms</li> <li>• Family violence (violence against women)</li> </ul>
<b>Iran</b>	Short hearing process	<ul style="list-style-type: none"> <li>• Sexual Orientation</li> <li>• Religion: Apostasy or Conversion to Christianity or Zoroastrianism</li> </ul>
<b>Rwanda</b>	Short hearing process	<ul style="list-style-type: none"> <li>• Sexual Orientation</li> </ul>
<b>Sudan</b>	File review (no hearing required)	<ul style="list-style-type: none"> <li>• Political opinion</li> <li>• Activism</li> <li>• Opposing current government</li> <li>• Opposing military conscription rate</li> </ul>
<b>Venezuela</b>	File review (no hearing required)	<ul style="list-style-type: none"> <li>• Political opinion</li> <li>• Activism and/or organization</li> <li>• Anti-government</li> </ul>
<b>Venezuela</b>	Short hearing process	<ul style="list-style-type: none"> <li>• Sexual Orientation</li> </ul>

Source: Immigration and Refugee Board of Canada<sup>12</sup>

- **Station a portion of the Refugee Corps overseas in proximity to Resettlement Support Centers in cooperation with the State Department.** With the challenges presented by COVID-19 and the limitations of circuit rides, it has become clear that not having local access to immigration officials at RSCs can significantly hinder pipeline progress. Having a portion of the Refugee Corps stationed overseas full-time, including at USCIS international offices, would increase the capacity to adjudicate cases and fulfill the legal requirements of having an immigration official available outside of the limited circuit ride schedule.

## The State Department

Overseen by PRM, RSCs prepare casework for refugees who are eligible to be interviewed by USCIS and support other resettlement requirements before travel. Despite reductions in their capacity under the Trump Administration, RSCs are relatively well positioned to quickly scale up their operations to support an increase in admissions. Due to the already decreased capacity within the RSCs and the need to manage concerns around the handling of Personally Identifiable Information of refugees, the ability of RSC staff to work remotely during the COVID-19 pandemic has been limited. Though this challenge is expected to be temporary, it is an important limiting factor currently to scaling up.



A planned shift in technology systems will place additional demands on the capacity of the RSCs and will need to be carefully managed alongside a push to increase admissions. In September 2020, PRM began to deploy START, a new, more secure system replacing the outdated Worldwide Refugee Admissions Processing System (WRAPS).<sup>13</sup> With the first RSC scheduled to deploy START in January 2021 and the overall goal of retiring WRAPS at the beginning of FY22, a year of rapid admissions expansion alongside new system integration will be challenging. It will be important for new systems to be monitored closely to quickly address the operational and technical issues that will arise during even the smoothest rollouts of new technology. The rollout across RSCs should be coordinated with operational plans to avoid launching in a region during particularly high-volume periods. Further, with the beginning of the rollout of START, PRM announced that several public reports on refugee arrivals would no longer be available.<sup>14</sup> PRM should ensure that the overall quality, completeness, and timeliness of open data and public reports on the USRAP does not decrease due to the system migration.

### Months 1–6

- **Ramp up RSC staffing and operating levels to 2017 levels.** With the decrease in refugee processing since 2017, in addition to challenges posed by COVID-19, RSC funding and staffing levels have declined. Though the RSCs are prepared and have experience increasing staffing rapidly, it will be important for RSCs to prioritize rebuilding capacity, with the support of PRM, as soon as possible to ensure that overseas processing does not delay pipeline progression.
- **Re-establish the State Department Digital Service.** USDS is headquartered in the White House Office of Management and Budget and also embeds teams in departments. Support for USRAP in 2015 and 2016 came from a combined team spanning USDS headquarters and the Digital Service teams at DHS and State. The DHS Digital Service still exists, but the State Department Digital Service was shut down in 2017.

### Months 6–12

- **Decrease documentation inconsistencies in pre-screening interviews.** A common challenge in USCIS interviews is incomplete or inaccurate information on Form I-590 due to miscommunications between PRM, USCIS, and RSCs about the use of primary documents. Form I-590 is initially completed by RSC staff during the pre-screen interview. When Refugee Officers find that information is inconsistent or lacking, Form I-590 is updated during the USCIS interview, kicking off new rounds of security checks and further delaying the process. Simple training to ensure that all RSC staff are equipped to successfully complete pre-screening interviews and documentation would save refugees and staff time and resources.

- **Continue enhancing technology supporting USRAP.** One major challenge to improving RSC field operations is having secure and reliable internet access in remote locations. In previous efforts, RSCs, PRM, and USDS have explored different technical options to alleviate this challenge; however, a reliable solution has not been found. Moving forward, PRM, USCIS, USDS and other partners should utilize alternative approaches to this challenge and continue modernizing all technology supporting USRAP with the long-term goal of enabling secure and equitable virtual processing that extends the reach of the program.

## Years 2–4

- **Improve the referral and RSC pre-screen process to increase overall operational agility and responsiveness of USRAP.** USRAP should be able to rapidly identify and respond to populations in crises. However, the current infrastructure does not support operational agility or flexibilities, hindering the ability to fulfill the overall mission of the program. A new administration should work to improve the entire process, starting with the identification of vulnerable populations and initial processing, to ensure that the U.S. is ready and able to respond whenever necessary. For example, PRM could establish a virtual “roving RSC” that has the ability to process cases in new locations and build the operational capacity for single-site processing that can be quickly deployed in response to new crises.

## Recommendation 1.2

### Improve the efficiency of refugee security vetting.

Refugees are vetted to the highest standard of any immigrants or travelers to the United States. This is a strength, but even at previous peak levels of admissions, refugees only represented a fraction of a percent of all international entrants to the country. This low volume allowed for strong vetting to be developed in a way that requires extensive manual effort. Vetting responsibility is currently distributed across more than nine different agencies, most of whom do not view it as central to their mission. Previous efforts to increase admissions have required regular high-level management at the level of the Deputy National Security Advisor for vetting agencies to appropriately staff and prioritize this workload. Multiple former officials cautioned that even in a supportive administration this level of senior engagement cannot be assumed. Significant automation and process improvements are required in order to maintain a high level of quality for refugee vetting while removing opportunities for backlogs to develop.

Given the classified nature of much of refugee vetting, this report is not well-positioned to deliver targeted recommendations on process changes. However, through our research, we have identified six key criteria for effective, efficient, and accountable security checks:<sup>e</sup>

- 1. Automated data transfers** of refugee biographic and biometric data and unclassified check results. Data should move securely between unclassified and classified systems multiple times a day, without manual intervention. In this context, “check results” only includes the unclassified top-line result (“clear”/“not clear”) and does not refer to classified cables providing further result details.
- 2. Initial automated gates** that only require manual review for a small subset of cases where potentially material information to the case is identified. For several checks, the initial lookup and analysis against vetting data sources is still manual, which is simply impossible to scale. These manual reviews should be integrated into existing processes and systems for other at-scale vetting processes and mechanisms, such as the National Vetting Center (NVC). Automation should reduce delays associated with re-running checks after biographic or contact information for refugees or U.S. ties changes throughout the lifecycle of a case, by only requiring new information to be reviewed.
- 3. Vetting agency analysis** to determine the relevance of information to a case, along with dissemination of findings to other vetting agencies. The vetting agencies are experts in their own holdings and must analyze it in conjunction with findings from other agencies to develop a holistic understanding for the adjudicator. In many cases, this analysis should conclude that information found is immaterial, and not pass it along for adjudicator review at all. Analysis should operate in a Fusion Center-type environment that allows analysts from multiple agencies to review their work together, identify connections between information, and ensure the adjudicator receives the most complete and accurate data held by the U.S. Government.
- 4. Adjudicating agency review** and decision of the effect of vetting agency information on the case. It is the responsibility of PRM and USCIS, as the adjudicating agencies, to determine whether the information they receive from vetting agencies is relevant and material to the case outcome. The vetting agencies provide this information and appropriate support to the adjudicating agencies. USCIS and PRM must be sufficiently staffed, with personnel with required security clearances, to conduct the review and evaluation of vetting agency information in a meaningful and efficient manner.
- 5. Recurrent vetting** which automatically checks for new information until the refugee arrives in the U.S., when legally permissible. Given the length of the refugee admissions process, vetting refugees at a single point in time is not enough. Having an automated initial gate allows for those automated checks to be re-run constantly, with new information surfaced as it is found.

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<sup>e</sup> These apply to “checks” that are required for all or broad categories of refugees, rather than holds such as TRIG and CARRP which involve deeper review only for specific cases.

6. **Interagency governance** with service level agreements for processing time and established processes for reviewing and approving process changes. Individual agencies should not be able to unilaterally implement changes to their processes. Even when well-intentioned, these changes can have major downstream effects on the overall pipeline if not coordinated.

These criteria can serve as a foundational framework for the following actions and reviews of the refugee vetting system:

#### Months 1–6

- **Convene an interagency process through the NSC to conduct an immediate review of refugee security vetting** to develop options to achieve the following by the start of FY22:
  - Formal, unified interagency governance of all vetting, including service level agreements and metrics for vetting responses and data sharing requests;
  - Consolidation of vetting processes and technology across agencies on a modern, scalable system, likely via the National Vetting Center;
  - Adjustment of vetting methods and thresholds to best adapt to the changing threat environment.
- **Strengthen the National Vetting Governance Board (NVGB) and leverage it with support from the U.S. Digital Service to immediately begin tracking of security check status and prioritizing backlogs across agencies.** In prior administrations, the NSC took responsibility for coordinating and prioritizing across the vetting agencies to process checks. The NVGB was created in 2018 “to provide guidance to the national vetting enterprise.”<sup>15</sup> Former officials suggest the NVGB may be well-placed to conduct this oversight and coordination. A new administration should review the charter, membership, and processes of the NVGB to ensure it is effective as the interagency coordinating body for this work. Further, a USDS or equivalent team will be necessary to provide ongoing data insights, develop tools to prioritize cases so that vetting agencies are working first on cases most likely to travel, and analyze workload requirements to ensure vetting agencies dedicate appropriate staff to this mission.
- **Review the groups and nationalities that require a Security Advisory Opinion (SAO).** The SAO is required for certain groups and nationalities identified as posing a higher risk. These criteria must be updated regularly as threats evolve. The SAO Review Board, an interagency governance body, should ask agencies to submit recommendations for adjustments to these criteria and act on them within 45 days.
- **Conduct a comprehensive evaluation of the efficacy of USCIS Enhanced Fraud Detection and National Security Directorate (FDNS) Review (EFR).** USCIS conducts “enhanced review of certain refugee cases” including “classified and unclassified research” and “screening data against publicly available social media.”<sup>16</sup> Multiple former officials raised serious questions about the value of this review and described a highly manual process that risks introducing

massive backlogs should refugee admissions targets increase. The USCIS Director should assign this evaluation to an organization with extensive national security experience outside of the Refugee, Asylum and International Operations Directorate or FDNS. The evaluation should include an analysis of cases where EFR provided unique information not found by other checks that was materially relevant to the adjudication of a case. The USCIS Director should then make a decision on any changes necessary to EFR based on the results of this evaluation.

- **Direct USCIS to immediately begin reviewing and acting on cases placed on hold.** USCIS places cases on hold under Terrorism-Related Inadmissibility Grounds (TRIG) and the Controlled Application Review and Resolution Program (CARRP). Cases placed on hold face lengthy delays to be considered, leaving refugee families in the dark as to the status of their case. These delays further harm some of the most vulnerable populations of refugees, such as those fleeing terrorist groups. USCIS should immediately assign additional staff to review and act on existing holds and set and monitor standard timelines for reviews. Officers should be instructed to require re-interviews only when absolutely necessary and exercise flexibility to conduct more of these re-interviews remotely.

## Months 6–12

- **Consolidate refugee vetting under a unified process and technology system in time for FY22.** While the specifics of these changes should be determined via the NSC review, multiple former officials suggested that a significant positive change could involve migrating checks to the National Vetting Center. The NVC was established in 2018 to “improve the efficiency and effectiveness of U.S. Government vetting.”<sup>17</sup> While the NVC was created during the current administration, planning for it began under the Obama Administration. It is currently operational for Electronic System for Travel Authorization (ESTA) Visa Waiver Program travelers and brings vetting processes and staff from multiple agencies into a single center and standardized technology solution. Initial conversations suggest that migrating many parts of refugee vetting to the NVC could achieve most of the criteria outlined above. Unlike the introduction of the Interagency Check in 2008 and EFR in 2016, the mandate and capabilities of the NVC suggest that it would be able to replace many if not all of the current security checks, rather than being added as a new check on top of existing processes. The NVC will likely require budget, staffing, and technical assistance to accelerate implementation timelines in order to meet this goal.
- **Reform guidance and processes around USCIS holds.** Former Refugee Officers report a lack of specific, actionable guidance on which cases to place on hold, leading to wildly differing numbers of holds placed by different officers. Officers are routinely required to place cases on hold even when they are certain the hold will be lifted after review (and extensive delay). USCIS should conduct a review of current legal interpretations, particularly those around “material support” to terrorist organizations. Processes around existing TRIG exemptions should be reviewed to ensure consistent and thorough application of existing rules, including

empowering supervisors to grant more exceptions in the field rather than refer to headquarters. These new policies should be reinforced through technology: as USCIS introduces new case management software, placing a case on hold should require citing specific, legally mandated grounds, and data from this should be used to inform ongoing policy improvements. The NSC should resume interagency processes around new TRIG exemptions and explore if another interagency body such as the NVGB can serve as a more appropriate forum on an ongoing basis while still ensuring speedy Secretarial determinations for exemptions.

### Recommendation 1.3

## Rebuild and grow multiple referral pathways into the USRAP pipeline, both inside and outside of UNHCR.

To meet a near-term goal of increased refugee admissions, a new administration will need to take immediate steps to resume UNHCR referrals and rebuild UNHCR's overseas infrastructure for sourcing new referrals into the USRAP pipeline. In order for the U.S. to meet a high admissions target in FY22, UNHCR will need to refer at significantly higher than historical rates starting as early as the first half of FY21. To meet the ambition of sustainably scaling up USRAP over the long-term, the next administration should also invest in building multiple referral pathways outside of UNHCR including NGO referrals. NGOs are well placed to refer highly vulnerable persons who might otherwise be overlooked by UNHCR, such as refugees with urgent protection needs who are at risk in camps (e.g., LGBTI individuals) or those living in non-camp settings. While NGO referrals will initially only provide relatively modest numbers of new cases into the USRAP pipeline, building NGO referral pathways will also ensure that the program can continue to operate if UNHCR referral pathways break down for any reason, such as if processing in a specific location or of a specific population referred by UNHCR is stalled.

### Months 1–6

- **Work with UNHCR to streamline and revisit their processes for providing Priority 1 (P-1) referrals to USRAP.** PRM should work with UNHCR to build on previous efforts to pilot a streamlined Resettlement Registration Form (RRF) for P-1 referrals to USRAP, given that the U.S. primarily relies on its own pre-admission interviews and security checks process to determine admission. As USRAP streamlines its vetting procedures, USCIS and vetting partners should also coordinate with UNHCR to revisit profiles for P-1 referrals, including consideration of deprioritized individuals with high levels of vulnerability. Deprioritization refers to an extensive list of profiles that are not excludable under the 1951 Refugee Convention but that UNHCR has automatically “deprioritized” for resettlement consideration because of U.S. government concerns that they would trigger security reviews.

- **Provide funding for staffing deployment schemes to increase UNHCR capacity to identify new referrals and resolve deferrals.** UNHCR relies heavily on cooperative staffing deployment schemes in partnership with other organizations to adequately staff its resettlement operations to intake new referrals. While UNHCR operations are understaffed, it is also common for significant numbers of cases in the RSC portion of the USRAP pipeline to be on hold pending UNHCR response. PRM should provide additional funding to these deployment schemes to enable UNHCR to fill its most critical staffing gaps and enable both new referrals and deferred cases to move concurrently.
- **Direct the State Department to issue a cable to all posts on embassy P-1 referrals.** The cable should remind posts of their authority to make P-1 referrals and explain why and when in-country and refugee referrals are appropriate. The cable should also encourage posts to appoint a point person for embassy referrals to work in conjunction with the PRM Regional Refugee Coordinator and engage with local NGOs/CSOs to source possible referrals that the embassy can submit.
- **Direct PRM to work with UNHCR to identify specific populations with urgent protection needs that should be considered for group-based P-2 referrals.** Stakeholders involved in overseas processing report that after identifying and designing the group criteria for a given population for P-2 referrals, such referrals are less labor and resource-intensive to process and could help facilitate a rapid increase in USRAP admissions. P-2 groups should be clearly delineated with shared characteristics, to avoid the risk of drawing overly large groups that will either lead to backlogs or prevent other vulnerable people from having USRAP access. Specific refugee groups with current protection needs include Uyghurs and Turkic Muslim refugees from China, activists and journalists fleeing Hong Kong, and Rohingya Muslims displaced from Burma. P-2 designations should also clearly specify that all case members granted access at submission shall retain access, and any children born after submission automatically gain access as well. This will ensure that aging out or married children will not require a new P-1.
- **Direct the State Department to prioritize bilateral and multilateral diplomacy in support of these recommendations.** The United States is not only the single largest financial contributor to UNHCR; its humanitarian negotiating power helps facilitate refugee resettlement globally. Where needed, the State Department should offer diplomatic support to increase UNHCR and RSC staffing, open additional facilities, facilitate visas, and support exit and travel documentation for refugees.

## Months 6–12

- **Encourage UNHCR to improve and expand its intake of individual referrals from local NGOs.** Currently, NGO-identified refugees typically comprise 10% or less of a given UNHCR operation's referrals to the global resettlement system.<sup>18</sup> NGOs have reported multiple challenges in providing referrals to UNHCR including limited communication after submitting a referral and the lack of standardized referral mechanisms across different locations. These issues can deter NGO staff from initiating referrals and also lead to poor-quality referrals. PRM should support UNHCR to strengthen its channels of communication with local NGOs, run additional trainings, and standardize its processes for collecting NGO referrals.
- **Build and strengthen direct NGO referral pathways to USRAP outside of UNHCR.** PRM should encourage established and reputable NGO working overseas with refugees to make P-1 referrals, including in-country referrals for particularly vulnerable cases (e.g., human rights defenders and LGBTI individuals who are at risk). Currently, only three NGOs (RefugePoint, HIAS, and the International Refugee Assistance Project) are certified to provide direct referrals to USRAP. PRM should also work with larger NGOs to identify referrals from smaller NGOs/CSOs and bundle these for referral to USRAP, in addition to encouraging new NGOs to participate in resettlement by providing and/or funding training for new referral partners. PRM should direct RSCs to establish a point person in each region who can facilitate and accept NGO referrals. PRM should continue to implement robust fraud prevention measures as part of the creation of new NGO pathways to continue to safeguard the program's integrity and prevent any corruption through manipulation of the resettlement system.
- **Engage UNHCR on potential reforms to the interpretation and application of its resettlement criteria.** Elements of UNHCR's resettlement criteria have been criticized for being subject to vague and seemingly arbitrary interpretation – for instance, the UNHCR criterion on “refugees without local integration (and voluntary repatriation) prospects.” PRM should revisit UNHCR resettlement criteria to assess whether its interpretation should be adapted to ensure a greater number of refugees are appropriately identified as candidates for resettlement.



## Plan of Action #2

# Responding to Challenges in the Western Hemisphere

Over the past decade, USRAP admissions from Latin America and Caribbean have primarily come from Cubans eligible for in-country resettlement P-2 programs (with numbers declining due to a shrinking pool of applicants),<sup>f</sup> at-risk Colombian refugees through P-1 UNHCR referrals (primarily processed through Ecuador), and only more recently Central American minors. This reflects a growing mismatch between the populations currently prioritized for resettlement from the Western Hemisphere and the most pressing refugee pressures in the region, with the largest flows coming from Venezuela and the Northern Triangle countries. UNHCR has projected that approximately 30,000 people from the Latin America and Caribbean region will be in need of resettlement in 2021, with over five million refugees and migrants currently fleeing Venezuela by the beginning of 2020 and more than 380,000 refugees fleeing the Northern Triangle countries in 2019.<sup>19</sup> Consequently, a new administration should take a systematic look at the populations from the Western Hemisphere that we are admitting through USRAP and take measures to admit higher numbers of Central Americans and Venezuelans, to better align U.S. resettlement operations with the greatest need in the region.

Most immediately, a new administration will face the question of how to use resettlement as part of the humanitarian response at the U.S.-Mexico border, as it will likely inherit a worsening, intensifying humanitarian emergency fueled by the Trump Administration's Migrant Protection Protocols. Given the political urgency of addressing this situation, there are live debates over how to increase refugee processing in the region and use resettlement as one tool for addressing the humanitarian needs at the border. However, there are several key challenges posed by the use of refugee processing as a tool to respond to pressures at the border that will need to be addressed if a new administration plans to meaningfully scale up admissions as part of its wider humanitarian response:

- **Links to Asylum Policy:** A new administration will need to ensure that an expansion of resettlement efforts in the region, particularly if processing is expanded in Mexico, does not replace or undermine resets in asylum policy at the border and that resettlement ultimately remains only one element of a broader, comprehensive strategy for managing migration at the border. Additionally, a new administration will need to grapple with the trade-offs that will result from a decision to surge resources to process asylum cases and the knock-on effects on the available resources for resettlement (i.e., the deployment of USCIS Refugee Officers to supplement the Asylum Corps and to address the backlog of asylum cases).

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<sup>f</sup> The decline in numbers can also be partly attributed to the suspension of consular services following the draw-down of embassy staff at the U.S. embassy in Cuba in 2017.

- **Gang-Based Claims and U.S. Interpretation of the Refugee Definition:** USCIS' current interpretations of the refugee definition make it extremely difficult for Central Americans with gang and domestic violence-based refugee claims to qualify for refugee status. At a minimum, a new administration will need to reverse legal decisions under the Trump Administration that have narrowed U.S. interpretation of the refugee definition as it applies to asylum-seekers at the border.<sup>9</sup> However, even prior to the Trump Administration, USCIS frequently found that refugees with these types of claims were unable to meet the requirements established under the refugee definition. Without amending USCIS interpretation of the definition, a larger resettlement effort focused on refugees from Central America will not result in actual higher admissions as USCIS will likely continue issuing denials on the refugee claims of the majority of applicants and fall back on offering alternative more limited forms of protection, including humanitarian parole.<sup>h</sup>

Once a new administration addresses these fundamental challenges, it could consider the following recommendations to expand refugee processing in Western Hemisphere:

### Recommendation 2.1

## Reinstate and expand the Central American Minors program with clear, achievable objectives.

The Obama Administration established the Central American Minors (CAM) program in December 2014 as an in-country refugee and parole program that allowed parents legally residing in the U.S. to apply for resettlement on behalf of their children (and qualifying relatives) residing in the Northern Triangle countries. Before the Trump Administration terminated the parole program in August 2017 and phased out the refugee program beginning in November 2017, eligible parents had submitted over 13,000 applications to the program and approximately 3,000 people had arrived in the U.S. through CAM.<sup>20</sup>

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<sup>9</sup> This will require Attorney General review of the following cases: former Attorney General Jeff Sessions' 2018 decision that individuals facing domestic and gang violence are no longer eligible for asylum (Matter of A-B) and Attorney General William Barr's 2019 decision that immigrants fearing persecution due to family ties are no longer eligible for asylum (Matter of L-E-A).

<sup>h</sup> In August 2016, USCIS reported that 63% of applicants to CAM were recommended for parole while only 25% were approved/conditionally approved for refugee status. See U.S. Citizenship and Immigration Services Ombudsman, *Recommendation on Central American Minors (CAM) Refugee/Parole Program*, 2016, Washington, D.C.  
<https://www.dhs.gov/sites/default/files/publications/Citizenship%20and%20Immigration%20Service%20Ombudsman.pdf>.

While the Obama Administration's objective for CAM was to create an alternative to a dangerous journey to lessen pressures at the U.S.-Mexico border, the relatively modest numbers of refugee admissions through CAM reflect that the program was ultimately not able to successfully fulfill this objective. The effectiveness of CAM was constrained by inherent limitations in the program's design as an in-country processing mechanism, including its narrow eligibility criteria (requiring the presence of a parent who was legally present in the U.S.), the intensive dedication of resources required to effectively operate the program, and the lengthy processing times for applicants (which can be untenable for vulnerable children who face security risks that may prevent them from remaining in their country of origin).

In restarting CAM, a new administration should address the challenges posed by CAM's original design (including an expansion of the eligibility criteria, e.g., revising the legal U.S. residency requirement) while being clear about what CAM can realistically achieve. CAM can serve as a useful signal to demonstrate U.S. commitment to the region and as a tool to provide protection for the most-risk Central Americans with urgent protection needs, but it will ultimately have limited impact in making a clearly demonstrable difference in alleviating pressures at the border.

## Recommendation 2.2

# Establish a new strategy for expanding processing for refugees from countries in the Western Hemisphere.

A new strategy will be needed to determine the role that refugee resettlement should play in addressing the wider migration flows across the Western Hemisphere. This strategy could explore the following options for expanding refugee processing:

- **Launch a broader resettlement operation in the region with the objective of resettling significantly higher numbers of refugees from the Northern Triangle countries and Venezuelan refugees.** In the last four years, the U.S. has only resettled, on average, fewer than 800 from the Northern Triangle countries in total, even with the Trump Administration's reservation of resettlement slots for refugees from the Northern Triangle as part of its replacement of regional-based allocations in the PD to specific category-based allocations. In FY20, the U.S. began resettling Venezuelan refugees for the first time since the start of the Venezuelan crisis in 2015 but has resettled only 20 refugees so far. Beyond an expanded CAM, a new administration could seek to expand refugee processing in the region by taking the following actions:
  - **Work with UNHCR to expand referral operations in Central America and Mexico and increase in-country processing capacity.** While UNHCR has traditionally been reluctant to process refugees in the region, they have more recently set up small referral operations in Mexico and Central America for refugees from the Northern Triangle that a new administration could seek to scale up as part of a larger resettlement effort in the region.

In response to the closure of shelters in Mexico due to COVID-19, UNHCR has also recently set up temporary formal refugee housing units for refugees and asylum seekers in southern Mexico. A new administration should coordinate efforts with UNHCR to scale up processing infrastructure in Mexico and other Central American countries where refugees from the Northern Triangle countries have fled. This initiative should focus on resettling the most vulnerable cases including unaccompanied children (regardless of family ties in the U.S.), women at risk, and LGBTQ individuals.

- **Provide support for UNHCR to partner with local/national NGOs in the Northern Triangle and Mexico to identify at-risk individuals in the most urgent need of resettlement.** National/local NGOs in Honduras, El Salvador, Guatemala, and Mexico that have accumulated expertise working with at-risk populations in recent years could be well placed to provide referrals of cases with urgent protection needs. A new administration should provide support for UNHCR to provide training to NGOs and establish mechanisms for referrals, while recognizing the need to carefully design a process for identification of cases that does not lead to NGOs facing greater demands from their clients to initiate referrals.
- **Leverage greater U.S. actions on resettlement to drive a stronger regional approach to refugee resettlement in the Western Hemisphere.** Building on an increase in U.S. commitments to resettle refugees from the Northern Triangle countries and Venezuela, a new administration should support a regional approach to addressing resettlement, including working with countries such as Canada. This should include working to secure commitments from a larger number of resettlement countries, both inside and outside the region, and to develop additional Protection Transfer Arrangement (PTA) programs with other countries in the Western Hemisphere. This would build on the PTA program established in July 2016 with Costa Rica, which allows for a maximum of 200 refugees every 6 months to travel to Costa Rica to wait for their refugee claim to be processed.

## Plan of Action #3

# Improving Refugee Outcomes

The sharp decrease in refugee arrivals in the U.S. under the Trump Administration has forced all nine national refugee resettlement agencies to lay-off staff and close offices. As of April 2019, 105 local RA offices (roughly one-third of all local resettlement offices across the country) have either closed entirely or suspended their operations.<sup>21</sup> Despite these difficult circumstances, local resettlement offices have worked diligently to sustain as much of their operations as possible. RAs have employed creative strategies to keep services in place and staff onboard, including pivoting to provide programs that serve both refugees and other immigrants. While this capacity will need to be rebuilt to meet the goal of higher admissions in FY21 and FY22, a new administration should use this moment as an opportunity to strengthen and reimagine the domestic resettlement system as a world-class model for successful refugee integration.

The public-private partnership model for domestic resettlement has resulted in a highly professionalized network of RAs. However, this model has gone largely unchanged in the forty years since its creation – leading to a system that has become overly focused on measuring RA compliance as opposed to refugee outcomes and un conducive to innovations in services to support the diverse needs of refugees. Furthermore, USRAP's overriding focus on achieving early economic self-sufficiency for refugees and rapidly securing their employment has resulted in a resettlement system that is not optimally designed or resourced to facilitate positive long-term integration outcomes. The Office of Refugee Admissions in PRM and ORR can use their funding and oversight of RAs to spur creativity and innovation within the system, ensuring that it is better able to facilitate successful refugee integration over time.

“When refugees come, they want to be self-sufficient. They are workers, they are doctors, they open businesses, they employ people. We pay taxes. Refugees and immigrants are the backbone of the economy of this country.”

— Refugee from Angola, resettled in 2015

### Recommendation 3.1

## Reorient domestic resettlement around a long-term outcomes-driven refugee integration policy, informed by the rigorous use of data.

The current system of domestic resettlement is oriented around fulfilling the primary objective of helping refugees achieve early economic “self-sufficiency” within three-to-six months of their arrival. Economic self-sufficiency is defined by ORR as a refugee earning a total household income that enables the household to support itself without relying on government cash assistance.<sup>i</sup> As a result, PRM and ORR have adopted policies that direct RAs to focus on helping refugees gain employment as soon as possible. PRM assesses RAs on whether their refugee clients are employed within 90 days of their arrival and ORR ties funding to RAs based on their ability to retain a 70% employment rate for clients 180 days after their arrival.<sup>22</sup> This short-term focus comes with significant trade-offs that undermine refugees’ long-term successful integration.<sup>23</sup> There is clear evidence that refugees who are obliged to accept immediate employment forgo opportunities that would further the quality of their integration and likelihood of producing economic benefits for themselves and their resettlement communities, such as participation in English language training, re-credentialing/re-skilling, mental health programs, and receiving additional formal education.<sup>24</sup> As a result, the current system leads to suboptimal outcomes for refugees – for years after their arrival, refugees often struggle with low English proficiency, under-employment, navigating the challenges of acculturation, and remaining stuck in low-income jobs.<sup>25</sup> To maximize positive long-term refugee outcomes, a new administration should reorient the policy focus of domestic resettlement efforts towards a more strategic, holistic, and data-driven approach to facilitating refugee integration. This will require significant innovations to PRM and ORR’s architectures for collecting and analyzing data on refugee outcomes.

### Months 1–6

- **Identify a comprehensive set of refugee outcomes to better measure successful refugee integration.** Beyond short-term economic outcomes as measured by employment within 90 and 180 days of arrival, PRM and ORR do not systematically collect information on or assess RAs on other measures of refugee integration. PRM and ORR should begin convening a regular working group with RAs and representatives from resettled refugee communities to set goals and consider a set of measures for successful long-term refugee integration that can form the basis for resettlement-related policy interventions. Such measures should include additional, long-term economic outcomes, such as employment status, employment quality, and

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<sup>i</sup> This definition of economic self-sufficiency often masks the reality that nominally “self-sufficient” refugees may still be relying on other types of government non-cash services such as the SNAP. If refugees are receiving SNAP benefits, this indicates that they are living 130% below the federal poverty guidelines – arguably cutting against this definition of economic self-sufficiency.

earnings, as a critical first step, as well as non-economic outcomes, such as naturalization, and measures of linguistic, navigational, social, psychological, and political integration that have been validated in academic and policy studies as effective measures of a refugee's successful integration.<sup>26</sup>

- **Build dedicated data collection and analytics capacity within PRM and ORR focused on measuring and tracking refugee outcomes.** PRM and ORR should recruit additional staff with technical expertise and empower them to create new processes for collecting, analyzing, and reporting on an agreed set of refugee outcomes. These staff should design research strategies, including how to link and merge different datasets across the U.S. government (e.g., data held by the DHS Office of Immigration Statistics and U.S. Census data) to generate more robust analysis, and serve as focal points for partnerships with academic and research institutions to leverage outside expertise. This collaboration will require reviewing guidelines for data sharing with outside partners.

## Months 6–12

- **Design longitudinal studies on refugee integration to commence in FY22.** ORR's current Annual Survey of Refugees provides a representative annual snapshot of the refugee population over the first years after their arrival. These new studies will begin generating the evidence base for a more holistic set of refugee outcomes to inform and shape policy. To collect these long-term outcomes, refugees should be given an opportunity to consent into a longitudinal study upon arrival. This study could incorporate two research strategies. The first strategy could involve merging refugees' landing data with administrative records (e.g. Master Earnings File, naturalization records). Working with the appropriate government agencies to merge data will allow researchers to continuously gather annual information on employment status, earnings, and naturalization status. The second strategy would conduct periodic surveys of refugees with their consent. These two approaches would avoid the major survey costs, high drop-out rates, and selection bias associated with locating refugees years after their arrival. Such a study would provide RAs and ORR with the data necessary to evaluate pilot programs and interventions without designing new and costly data collection efforts for each evaluation.

## Years 2–4

- **Pilot data-assisted refugee placement with select RAs to optimize refugee outcomes.** Allocation and placement rely on the expertise and judgement of RA staff. As well-informed and careful as these decisions are, they are limited in their ability to analyze historic patterns of varied economic and social conditions. These optimization challenges are well-suited for algorithm-assisted matching tools that can complement the professional judgement of RA staff. PRM should work with select RAs to pilot the use of algorithmic matching to inform RA placement decisions for cases without U.S. ties. This could build on previous work conducted by the Stanford Immigration Policy Lab to design a pilot of algorithmic placement with four

Ras, which ultimately stalled due to low admissions levels.<sup>27</sup> Since the algorithm reflects the historic data available, the model will initially optimize for short-term economic integration, but could eventually evolve to optimizing for long-term economic integration and/or non-economic outcomes and refugee preferences,<sup>28</sup> as this data becomes available.

- **Implement a new monitoring and evaluation framework for RAs that establishes shared ownership for holding RAs accountable to outcomes.** While PRM and ORR share responsibility for the funding and oversight of domestic resettlement programming, they assess different types of RA programming against different criteria. To drive closer coordination and strengthen the overall quality of service provision by RAs, PRM and ORR should implement a shared monitoring and evaluation framework that aligns their approaches to assessing the combined impact of their funding to RAs and creates shared data sets on refugee outcomes.

### Recommendation 3.2

**Invest in refugees and their long-term integration by increasing the scale and scope of resettlement support, including a broader set of interventions to address diverse refugee needs.**

The current funding and programming models used by PRM and ORR to provide resettlement support have led to significant underinvestment in refugees. There is clear evidence that refugees produce significant economic and demographic benefits to their new countries of resettlement, but only if adequate investment is made by resettlement countries to prioritize the well-being of refugees early on and alleviate the burden of the initial costs refugees face as part of their resettlement.<sup>29</sup> However, under the current system, PRM and ORR funding formulas have not adapted to account for rising costs. The reality is that the R&P program operated by PRM barely covers the costs for a refugee's most basic needs during their earliest days and most refugees find it challenging to access ORR services in subsequent years, given scarce funding and the focus on new arrivals. Programming is also almost entirely centered around facilitating early employment and often designed with inflexible requirements or limited availability, making it difficult for RAs to offer a range of programs that address different dimensions of refugee needs ranging from psychological health to long-term career planning. Recognizing budget constraints, a new administration should explore how to increase the scale and scope of resettlement support and services funded by PRM and ORR – with this funding representing not a cost to be borne, but rather an investment in the full potential of refugees that will enable them to integrate successfully as productive members of U.S. society over the long-term and produce multi-generational benefits to the communities where they are resettled.



“I wish there were more programs to help newly arrived refugees. The first two years are critical.”

— Refugee from Myanmar, resettled as a child in 2008

## Months 6–12

- **Modernize the current R&P funding model to account for the current financial realities faced by refugees.** Under the R&P program, PRM currently provides a flat per capita grant to RAs of \$2,275 for each refugee resettled – with \$1,225 of this grant going directly towards covering the material needs of refugees for their first 30–90 days in the U.S. and the remaining \$1,050 going to the local resettlement offices to cover their administrative costs.<sup>j</sup> This funding barely covers most refugees’ basic needs during their first 30 days, let alone for their first 90 days, particularly in areas with high housing costs. Typically, the entire portion of the R&P grant for refugees’ material needs is immediately used to cover a refugee’s housing deposit and their first month of rent, meaning refugees often have no financial support for other needs. In its first budget request to Congress, a new administration should identify an appropriate increase to the R&P grant amount to set an adequate baseline of support to refugees and explore establishing a process for flexibly adjusting the grant amount to account for differences in cost-of-living based on a refugee’s resettlement location.
- **Revise the ORR funding formula to be based on projected PD admissions numbers and known population needs, rather than arrivals over the prior year.** Funding that is provided on the basis of projections from the PD will enable RAs to more effectively invest in case management capacity and tailored specialized services.

## Years 2–4

- **Engage Congress to secure support for expanding the time horizon of the R&P program beyond a refugee’s first 90 days to provide a stronger foundation of support to refugees.** While refugees have proven admirably adaptable and resilient under the current system, they are forced to navigate considerable challenges to ensure that, at a bare minimum, they can meet their most basic material needs without R&P-funded support.<sup>k</sup> These challenges prevent refugees from dedicating their time, energies, and resources towards their long-term goals and aspirations. Investing in up-front costs to cover refugee needs and build capacities is likely to yield higher dividends as better employment outcomes lead to higher wages and tax contributions over time.

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<sup>j</sup> These figures reflect a recent change to the size of the R&P grant under the FY21 cooperative agreements. Previously, from FY19 to FY20, the total grant amount was \$2,175 (\$1,175 for refugees specifically and \$1,000 for administrative costs of RAs).

<sup>k</sup> Based on our research with national and local RA staff and state-level refugee coordinators, it typically takes a refugee (who is able to work) 4–6 months to find a job and begin to cover their housing costs.

“What was challenging when I first arrived? Everything.”

– SIV recipient from Iraq, resettled in 2013

- **Review ORR funding mechanisms to support a broader range of programs that address specific refugee needs and holistically support refugee well-being.** The five types of programming described below were identified by RA staff and refugees as key areas where ORR could usefully increase investment, though there are many other areas of programming that could benefit from additional support.
  - **Increase access to programs that address critical mental health needs.** ORR supports some emotional wellness programming, but it is currently limited to specific populations in certain states based on the program. For example, ORR offers grants to fund programs specifically for survivors of torture, but these only exist in 22 states, meaning that refugees who live outside of these states are currently unable to access such programs.
  - **Support community-based programs.** ORR provides grants to Ethnic Community Based Organizations to operate a range of programs – including ESOL, assistance with college preparation, and workshops that teach U.S. customs and laws – that help integrate refugees into ethnic and cultural communities. These programs have proven to be powerful tools for helping refugees build their social networks, which in turn can be valuable sources of psychological and economic support.
  - **Expand the availability of financial literacy programs,** which are currently only available to refugees who have a paying job. Financial literacy is a critical tool for all refugees, including those who are currently unemployed, to effectively navigate financial systems.
  - **Support cash assistance or credit programs that can cover the costs of key fixed assets needed for employment purposes, such as purchasing a car.** Financial assistance in the form of direct cash transfers (among low-income groups in general) and access to credit (often when coupled with financial literacy programs) are associated with positive earnings, savings, and repayment rates among higher-skilled refugees in particular.<sup>30</sup>
  - **Fund skills assessment, re-credentialing, and vocational programs to help refugees develop marketable job skills and pursue their long-term career aspirations.** An emerging body of evidence suggests that skills assessments and re-credentialing, especially for high-skilled refugees, can be an impactful tool that bolsters refugees’ integration prospects by enabling them to pursue satisfying work in line with their career experience and expertise.<sup>31</sup>

- **Support refugees in their journeys to become naturalized U.S. citizens, including through reduced or waived USCIS fees for naturalization applications.** Resettled refugees are eligible to apply for Lawful Permanent Resident status one year after their arrival, and they can subsequently apply for naturalization five years after their arrival. The U.S. government should actively encourage refugees to become naturalized citizens as part of a refugee integration strategy, with naturalization serving as a proxy for meaningful long-term integration into U.S. society. However, the significant increase in USCIS fees poses a real financial barrier for refugees. As of October 2, 2020, USCIS is charging \$1,170 to process naturalization applications, an 83% increase from the current fee of \$640.<sup>1</sup> Given evidence that fee waivers increase naturalization rates among low-income immigrants,<sup>32</sup> a new administration should restore and improve access to fee waivers and work to reduce USCIS fees over time through digitization and process improvement.

“All of my refugee friends all want to go into law or the medical field to help their neighborhoods.”

— Refugee from Myanmar, resettled as a child in 2008

### Recommendation 3.3

## Improve overseas processing and pre-departure procedures to empower refugees with dignity and agency as they navigate the process.

Recognizing that refugees are often victims of trauma, the overseas process should be improved to elevate protection concerns and enable refugees to better advocate for themselves. The perspectives of refugees can improve the efficiency of the process and accelerate successful integration. From the moment that refugees are referred and pre-screened, they make decisions that affect their chances of successful resettlement. For instance, refugees are constantly evaluating other options for mobility as an alternative to waiting in camps or other settings for several years pending a final decision on their application to be resettled. An applicant who has not heard anything from the U.S. may risk a dangerous journey because they have not received any information about the status of their refugee claim. While it is unlikely that a new administration would have the bandwidth to pursue these reforms early on, multiple interviews and consultations with recently arrived refugees suggest such changes would make a real and meaningful difference.

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<sup>1</sup> However, this fee increase is currently being litigated in two ongoing court cases.

## Years 2–4

### Overseas Processing

- **Adopt trauma-informed interview techniques.** RSC and USCIS staff should receive training on trauma-informed interviewing techniques,<sup>33</sup> such as those adopted by the Department of Justice Office of Violence Against Women and the State Department Office to Monitor and Combat Trafficking in Persons.<sup>34</sup> In addition, a streamlined UNHCR Resettlement Registration Form, as proposed in Recommendation 1.3, would help reduce redundancy in the interview process that requires refugees to repeatedly retell and relive trauma.
- **Enable refugees to receive accurate, up-to-date information about the progress of their case.** Each RSC has its own system for providing information on the status of a refugee's case (through a phone number, email address, and/or a website), and the information that refugees receive is minimal (e.g., a refugee may simply see that their case is "in progress."). Creating a single self-service platform would increase efficiency, promote transparency, dispel rumors, and strengthen cybersecurity. PRM could expand one of the platforms built by individual RSCs or build a new tool such as the case status tools used by USCIS and Consular Affairs. Information should be accessible with a case number and the date of birth of the primary applicant to avoid obstacles from requiring passwords and login information.

"You can't even leave the camp, because you don't know when they are going to call you."

— Refugee from Angola, resettled in 2015

- **Inform refugees why they are being asked whether they have a "U.S. tie" and allow them to add or update this information.** When refugees are asked whether they have a U.S. tie during their RSC pre-screen interview, they are not consistently provided with the context for why the question is being asked. As a result, refugees may be reluctant, fearful, or unprepared to offer their U.S. tie's contact information and thereby unknowingly forfeit the opportunity to be resettled near their friend or family member. This lack of clarity is plausibly one of the reasons for secondary migration. The desire to move closer to co-nationals was found to be the primary motivation for secondary migration in a study of approximately 450,000 refugees in the U.S., which also finds that 17% of refugees move to another state 12 months after arrival.<sup>35</sup>
- **Provide procedural safeguards to refugees undergoing the screening and interview process.** A new administration should consider ways to give refugees access to an attorney during the resettlement process (at no cost to the government) and to publish the policies governing USRAP procedures (most of which are currently only available internally) to enable refugees, their family members, and legal representatives to track applicable rules and policy changes.

USCIS could also consider providing access to the administrative record if an individual receives a denial.

### Accelerating Integration Pre-Departure

- **Invest in pre-departure overseas language instruction and cultural, educational, and employment preparations to accelerate successful integration.** The time that refugees spend waiting for their case to be processed could be leveraged to better prepare them for resettlement in the U.S.<sup>36</sup> PRM should consider expanding English Language Development courses for refugees overseas such as those piloted at RSC Africa, RSC Thailand, and RSC Nepal with positive results. RSCs could also offer pre-departure education and employment planning including refugee-informed skills assessment, re-credentialing planning, and the creation of virtual backpacks to store diplomas, transcripts, and resumes.<sup>37</sup>

“If refugees are mechanics, then consider how to teach them the vocabulary of their profession in English to give them footholds. Sometimes people have the professional knowledge, but then can’t use it. We should help them certify their skills before they arrive and provide apprenticeship and mentorship programs so they can immediately apply them.”

– Refugee from Rwanda, resettled in 2009

- **Explore different avenues for reducing the financial burdens that refugees incur under the current system of travel loans.** Refugees who travel to the U.S. are issued interest-free travel loans to cover the costs of their air travel and other related expenses. The prices of these flights for refugees are significantly higher than average due to requirements on the type of airfare that can be booked (e.g., fully refundable tickets). Six months after their arrival, refugees are required to begin making payments on their loans to the U.S. government. RAs collect these payments and keep up to 25%. The repayment of these often sizable travel loans places a serious burden on refugees by eating into their already scant resources as they are trying to stabilize their lives in the U.S. Additionally, while one of the rationales behind the travel loans program is to help refugees build a credit record, many refugees default on their loans – suggesting that the program actually undermines, rather than enables, refugees’ abilities to establish credit worthiness.<sup>m</sup> A new administration should explore different

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<sup>m</sup> Advocates estimate that the rate of default on travel loans is approximately 40%.

avenues for lowering the costs and easing this substantial burden on refugees, including by building infrastructure for a private sponsorship initiative that would facilitate private contributions to cover travel loans in the form of financial donations or airline miles for families who are particularly vulnerable to default, negotiating with IOM to identify areas of flexibility for the type of airfare that can be booked, and negotiating with IOM to “unbundle” the flight portion of IOM’s travel services from other non-flight services.

- **Allow refugees to exercise more agency in their resettlement by taking their views into account when deciding their resettlement location.** If a refugee indicates a U.S. tie, an attempt is made to resettle them near that friend or family member. However, refugees with no U.S. connections have no say at all in where they will be resettled. While refugees may not necessarily be familiar with the particulars of the different locations where they could be resettled, it does not mean that their perspectives should be neglected. Refugees have important insights to offer about their own personal preferences and characteristics, which directly impact on the likelihood of their successful integration. This could include their desire to be resettled near a diaspora community, their preference for living in an urban versus rural environment, and their interest in continuing formal education in locations where this could be accommodated. PRM and RAs should explore how refugees can be re-engaged before the allocation process to understand their preferences, which could be taken into account alongside predicted economic outcomes through a data-driven placement pilot.<sup>38</sup>

“I was a big advocate for myself. When I found out about specific programs, I’d take advantage of every opportunity... I was lucky to hear about them. I feel like if I wasn’t such an advocate for myself, I wouldn’t know about the programs.”

— Refugee from Burma, resettled in 2004

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<sup>n</sup> For instance, the Shapiro Foundation successfully negotiated with IOM to “unbundle” the provision of flights for parolees from CAM in 2019 and identified flights that cost around \$200 per person. Previously, families travelling to the U.S. as CAM parolees were required to pay a total of \$1,100–\$1,400 per person to receive the bundle of IOM services.

## **Plan of Action #4**

# Expanding Community Involvement in Resettlement

The current domestic resettlement system under USRAP – centered on a public-private partnership model where the U.S. government contracts out the provision of resettlement services to a formalized network of RAs – has resulted in the professionalization of resettlement. As a result, the work of welcoming refugees and supporting their integration has been almost entirely assumed by the RAs and the cadre of caseworkers and other professional staff that they employ. While most RAs also draw on local volunteers and community groups to support their resettlement efforts, the ownership by RAs has meant that most Americans have not been exposed to opportunities to directly support resettled refugees. Recognizing the critically important role played by RAs and the value that has come from the development of specialized expertise among their staff, this phenomenon of professionalization has also inhibited the cultivation of an engaged and robust domestic constituency to advocate for refugee resettlement.

Community-based sponsorship represents a different model of settlement whereby a group of individuals (termed “sponsors”) are empowered to take responsibility for facilitating a refugee’s resettlement through financial and/or in-kind contributions and certain volunteer activities. The U.S. does not currently have an established and formalized national sponsorship program as currently exists in other countries, including Canada, the United Kingdom, and Germany. Canada has operated the longest running sponsorship initiative, establishing its Private Sponsorship of Refugees program in 1978 through which it has resettled over 300,000 refugees.<sup>39</sup> As a result, around two million Canadians have been personally involved in helping refugees resettle.<sup>40</sup>

By directly involving Americans in resettlement efforts, sponsorship could mobilize a new constituency of individuals and community groups to become powerful advocates for resettlement based on the impactful, often transformative experiences that come from developing relationships with refugees and being personally committed to their smooth arrival and successful integration. Over time, sponsorship could also facilitate a significant increase in the numbers of refugees resettled to the U.S. by bringing in additional resources.

“I still am in touch with the church that co-sponsored us. They have become part of my family.”

– Refugee from Rwanda, resettled in 2009

In order to launch a national program, a new administration will need to create new architecture and infrastructure, both within and outside of government, to encourage major shifts in the current resettlement system and to mobilize/organize interest from Americans across the country to become sponsors. While many different versions of community sponsorship programs exist, a new administration should launch a new national sponsorship program that supports two specific forms of sponsorship defined below.

1. **Co-sponsorship:** An established community group accepts through a written agreement with a RA to provide some portion of R&P services to a refugee.
2. **Private sponsorship:** A more intensive form of community sponsorship in which a group of individuals lead on facilitating a refugee's resettlement.

The table below outlines the key differences between co-sponsorship as it currently exists in the U.S. and private sponsorship as this report envisions.

<b>Co-Sponsorship and Private Sponsorship Comparison</b>				
	<b>Definition</b>	<b>Relationship to the Principle of Additionality</b>	<b>Matching of Refugees and Sponsors</b>	<b>Funding Arrangement</b>
<b>Co-sponsorship</b> (as currently exists in the U.S. in limited form)	<b>An established community group partners with an RA</b> (through a written agreement) to accept responsibility to provide some portion of R&P services to refugees. An RA manages sponsors and is ultimately accountable for the well-being of sponsored refugees.	Supports refugees that fall <b>within</b> the target set in the PD for refugees resettled with U.S. government funding.	Refugees in the USRAP pipeline are allocated to RAs and <b>matched</b> with groups screened/approved by RAs.	<b>Local RAs receive an R&amp;P grant</b> (totaling \$2,275) and use the portion earmarked for refugees (\$1,225) to provide for a refugee's resettlement.  Groups typically fundraise for a refugee's needs not covered through the R&P grant (average from \$4,000–\$10,000).
<b>Private sponsorship</b> (does not currently exist in the U.S.)	<b>Groups of individuals</b> serve as sponsors and assume <b>primary responsibility</b> for the resettlement of refugees, meaning sponsors are accountable. Sponsors are not formally managed by an RA.	Would support refugees admitted <b>in addition</b> to the target set in the PD for refugees resettled with U.S. government funding.	Would create a new referral category to resettle refugees through matching and refugees nominated by U.S.-based family members, who would be sponsors (" <b>naming</b> ").	Groups <b>would not receive an R&amp;P grant</b> and would be expected to fundraise to cover the equivalent amount (\$2,275).  Groups would fundraise a total financial contribution that would exceed what is required of co-sponsorship groups.



In FY21, a new administration should standardize and scale up existing co-sponsorship programs while also laying the groundwork for a new private sponsorship initiative, which should begin accepting referrals in FY22.

### Recommendation 4.1

## Significantly expand co-sponsorship programs in partnership with RAs in FY21.

Months 1–6

- **Amend PRM's current cooperative agreements with RAs.** PRM should consider lifting several requirements to give RAs greater flexibility to adapt their operations to incorporate and increase co-sponsorship. These include current requirements that stipulate: 1) co-sponsors must be “established community groups” (i.e., incorporated groups with a formalized legal structure such as 501(c)(3) organizations, faith institutions, schools, businesses, and professional organizations), which currently precludes informal community-based groups from becoming co-sponsors; and 2) refugees with no U.S. ties must be resettled within 50 miles of a local RA office, preventing RAs from matching refugees to co-sponsors who may be well-suited to support a specific case but are located outside of that 50-mile radius. Instead, refugees resettled through co-sponsorship with no U.S. ties should be treated the same as refugees with U.S. ties by being placed within a 100-mile radius of the RA.
- **Standardize core requirements of co-sponsorship programs.** At least 14 local RA offices across the country have independently introduced their own co-sponsorship programs where the exact division of responsibilities between sponsors and local RAs varies. For instance, some programs have been specifically referred to as “full co-sponsorship” programs to reflect that sponsors are expected to take on a higher level of responsibility by providing the majority of resettlement services. As PRM allows for more informal community-based groups to participate in co-sponsorship, it should also establish clear guidelines that standardize the core requirements expected of co-sponsors to ensure all co-sponsorship programs offer the same baseline level of support to refugees. This standardization also lays the groundwork for private sponsorship.

## Recommendation 4.2

# Design the architecture that will be required to launch a private sponsorship initiative.

To accord with the principle of additionality (i.e., refugees resettled through private sponsorship will be counted *in addition* to those the U.S. government has committed to resettle), new architecture must be able to track privately sponsored refugees separately from refugees resettled with U.S. government financial assistance.

- **Create a new Priority 6 (P-6) category that can accept and process referrals for privately sponsored refugees.** PRM should lead a process for designing a new P-6 referral category<sup>o</sup> specifically for refugees that will be resettled through private sponsorship. To ensure refugees will be resettled quickly through the P-6 category upon its launch, PRM could initially draw on refugees in the USRAP pipeline who have completed their DHS interview and use a combination of two processes: 1) matching of refugees with sponsors best suited to support them; and 2) “naming” of refugees nominated by their U.S.-based family members, who would subsequently act as sponsors. In the initial launch and pilot stage of the private sponsorship program, this two-pronged approach would prioritize vulnerable refugees in the pipeline who have been waiting to be resettled and enable sponsors to welcome new arrivals as soon as possible. After the pilot stage, P-6 referrals would shift to focus primarily on “named” refugees.
- **Establish a new funding structure for refugees resettled through private sponsorship that minimizes pressure on government budgets.** Private sponsors should be required, at a minimum, to provide financial contributions that are equivalent to the funding currently provided through the R&P program to support refugees resettled through USRAP. This would mean private sponsors would receive no funding through the R&P program and instead be required to contribute at least \$2,275 per refugee (covering both the \$1,225 portion of R&P funding designated for covering a refugee’s material needs and the \$1,050 portion provided to RAs to cover the administrative costs associated with providing resettlement services). Over time, sponsors could also be required to cover additional costs such as the costs associated with overseas processing.

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<sup>o</sup> The P-4 and P-5 referral categories are no longer used but were previously vehicles for extended family reunification.

### Recommendation 4.3

## Create the infrastructure for recruiting, training, and organizing sponsors at scale and launch a national campaign to recruit sponsors.

A new administration should establish a new public-private partnership to create the infrastructure for sponsorship that brings together RAs, philanthropic organizations who have been active in supporting community sponsorship, and national non-profit organizations who would be well placed to mobilize sponsors. As part of the partnership, PRM or ORR could contract out to a national non-profit organization to lead on building the permanent infrastructure for a national sponsorship program. This infrastructure would focus on the recruitment, training, and organization of sponsors, supporting both the expansion of co-sponsorship and the introduction of private sponsorship. More specifically, this infrastructure would cover the following key elements:

- **Establish national standards for sponsor eligibility and responsibility.** Consistency and quality control across different sponsorship programs at the local level requires standards on who is eligible to become a sponsor and the scope of a sponsor's responsibilities and contributions. This process of standard setting would involve both the standardization of existing and differing standards for co-sponsorship across local RAs and the development of new standards for private sponsorship. While the initial focus should be on identifying and establishing the core elements of sponsor eligibility and responsibility at a national level, these standards could allow for a multi-tiered system of commitment where individuals are able to commit to the tier that is most appropriate for them. This could include providing only financial contributions, only non-financial contributions (e.g., volunteering their time and skills), or a combination of both. Individuals would subsequently seek to organize their own, or be matched to, a sponsor group that works collectively to provide the required baseline of financial and non-financial types of support to sponsored refugees. A tiered system would maximize the number of Americans who become involved in sponsorship, building on lessons learned from sponsorship programs in other parts of the world where offering a system based on a "ladder of engagement" has incentivized a greater number of individuals to participate and facilitated interested individuals taking on higher levels of sponsor commitment over time.
- **Build new operational and technological infrastructure for the recruitment and organization of sponsors, such as a dynamic online portal.** Current co-sponsorship programs typically rely on a resource-intensive and paper-based administrative process for recruiting and managing sponsors, including the review of forms submitted by interested co-sponsors and the intake of detailed co-sponsor applications. A national non-profit organization could play a key role in creating new infrastructure that would alleviate this administrative burden for RAs while supporting a massive scale-up of efforts to recruit new sponsors, both for co-sponsorship and private sponsorship. This could include the creation of an online portal that would serve as a

“one-stop shop” and standardized point of entry for any individual interested in becoming a sponsor (as opposed to the current system where individuals must navigate different local RA offices in their area to find a sponsorship opportunity). The portal would build on existing informational resources (such as Refugee Council USA’s Community Sponsorship Volunteer Map) but go further by serving as a tool where interested individuals could directly submit their information and be matched with an appropriate local RA office that has sponsorship opportunities. The portal could collect digital applications that would be maintained in a database and transferred to the appropriate local RA office when a match is made. The portal could also include standardized digital versions of the various forms that RAs currently use to manage sponsors (e.g., checklists that sponsors are required to complete to ensure they are fulfilling their obligations). This portal could be a critical resource to help RAs manage a surge in sponsor interest once the national sponsorship program launches, given that RAs already have limited bandwidth to organize community volunteers and co-sponsors.

- **Train and support the RAs to manage sponsorship programs on the ground.** The national non-profit organization should have a dedicated team that designs, organizes, and runs regular trainings for local RA staff who are responsible for overseeing sponsorship programs and working with sponsors. Having a centralized team to facilitate trainings would enable the sharing of resources and best practices as the program is launched.
- **Facilitate a co-design process with organizations and stakeholders that have expertise in designing and launching sponsorship programs.** The national non-profit organization should draw on the expertise of organizations focused on sponsorship, such as the Global Refugee Sponsorship Initiative, and the experience of governments that have recently launched their own sponsorship programs. This co-design process should be initiated in advance of the initial launch of the sponsorship program in the U.S. and maintained as the program evolves after its launch, to enable the U.S. to learn from the emerging best practices and models of sponsorship that are being piloted and institutionalized in other parts of the world.
- **Facilitate research partnerships to rigorously evaluate the national sponsorship program once it is launched.** Despite the growing prevalence of sponsorship programs worldwide, there is no definitive causal evidence on the impacts of sponsorship. To better understand how different sponsorship models shape refugee outcomes, a new administration should use the launch of a national sponsorship program to build the evidence base on the effectiveness of sponsorship on key refugee outcomes. The national non-profit organization could facilitate collaborations between research organizations and RAs to design rigorous evaluations of sponsorship. These evaluations should be based on the gold standard of program evaluation – randomized control trials – to understand the impacts of sponsorship, which models of sponsorship work best, and for which refugee groups in particular. This landmark research would generate much needed evidence on how and when sponsorship improves refugee outcomes (e.g., economic, social, and linguistic integration). These results should be used to re-evaluate best practices around co-sponsorship and private sponsorship models on a regular basis.

## Months 6–12

- **Launch the national sponsorship program when the program’s architecture is ready, linked to a high-profile announcement and a nationwide marketing campaign.** To spotlight the official roll-out of a national sponsorship program, the next president or vice president could announce the program, commit to a target for resettled sponsored refugees in FY22, and issue a national call for volunteers to become sponsors. Since sponsorship will be a new concept for most Americans, the selected national non-profit organization should also lead a marketing campaign to raise awareness of sponsorship across the country. The campaign could feature targeted and tailored outreach to key states, municipalities, and cities in addition to corporations, civic organizations, and universities. The campaign could leverage high-profile figures with refugee backgrounds and explore creative means of incentivizing Americans to get involved, such as a mechanism that would match individual financial donations with funding from private philanthropy.

## Years 2–4

- **Adapt the national sponsorship program based on evaluations of the program after its first year of operation.** Drawing on a dynamic evaluation process, research partners should regularly share their findings with PRM, RAs, refugees and other stakeholders, and use the evaluation results to propose improvements to the design of the sponsorship program. For instance, research partners could explore how to use the evidence generated by evaluations to inform the refugee-sponsor matching process and adjust the process to optimize for refugee outcomes.

## Annex

# Strategies for the Rapid Hiring & Retention of Refugee Officers

A significant limiting factor to increasing the capacity of the U.S. Refugee Admissions Program (USRAP) is the availability of U.S. Citizenship and Immigration Services (USCIS) Refugee Officers to adjudicate cases. At its peak, the Refugee Corps comprised fewer than 200 Refugee Officers (ROs) and other supervisory staff.<sup>41</sup> In order to jumpstart the processing of refugees currently in the pipeline, USCIS will have to expeditiously hire and onboard a significant number of new officers at the beginning of a new administration. The USCIS Refugee, Asylum and International Operations Directorate (RAIO), which directs the International and Refugee Affairs Division (IRAD) and their ROs, should draw on the lessons learned and key findings on innovative talent identification, hiring, and retention practices from the learnings of the United States Digital Service<sup>42</sup> (USDS), the Partnership for Public Service's Call to Serve,<sup>43</sup> and proposals on how to creatively rebuild the diplomatic corps at the U.S. Department of State.<sup>44</sup>

## Profile of a Refugee Officer

Refugee Officers are permanent General Schedule federal appointments with highly specialized knowledge of the immigration law and regional conflicts. To adjudicate refugee cases, ROs are deployed on overseas circuit rides to conduct in-depth interviews with refugees and perform country conditions research to help determine eligibility for refugee resettlement. The candidates who join IRAD are early to mid-level professionals with diverse backgrounds, often with educational and professional experiences in law international relations.

## Improve Hiring

Like much of the hiring for U.S. government positions, the current USCIS hiring process is lengthy and inefficient, often deterring qualified candidates from applying and staying through the recruitment process. It currently takes ten months from identifying a staffing need to having a productive hire, a lag-time that presents an insurmountable barrier to building a Refugee Corps that can serve an increased caseload at scale.<sup>p</sup> Additionally, there is a constant need to hire new ROs. On average, ROs will serve in their role for two to three years before leaving federal service or

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<sup>p</sup> To become a RO, candidates are evaluated by IRAD after applying to the position through USAJobs and being determined minimally qualified by USCIS HR, a process that can take upwards of four months, according to several former IRAD officials. Once a candidate is offered the position, security screening and onboarding processes can take another two months before the new RO is able to join IRAD.

transitioning to a new position within USCIS due to RO burn-out (discussed further below). With the continuous need to identify and onboard ROs, it is inefficient to restart the hiring process every time an RO transitions off the team.

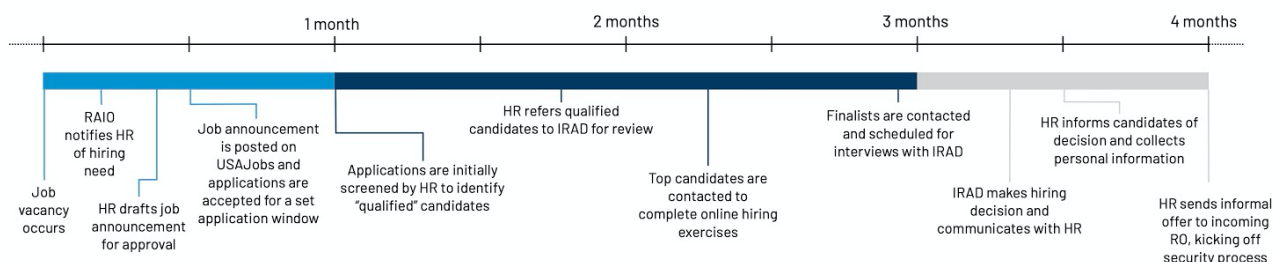
To improve hiring by decreasing overall process time and using innovative approaches to evaluate and support candidates throughout the process, it is recommended for USCIS and RAIO to take the following actions:

- 1. Utilize available Federal hiring flexibilities and authorities.** Based on the critical hiring need, RAIO should immediately utilize Direct Hiring Authority, which allows federal agencies to seek candidates outside of the typical process and expedite hiring by eliminating the need to comply with requirements on competitive rating and ranking, veterans' preference, and "rule of three" procedures.<sup>45</sup> This would allow for RAIO to advertise and collect simplified applications outside of USAJobs, and have their internal team review and progress candidates immediately. With this approach, USDS was able to decrease the average number of business days between application to initial offer from 152 days in Q1 of 2015 to 33 days in Q3 of 2016 for candidates joining its headquarters team within the Office of Management and Budget.<sup>46</sup> Other flexibilities, such as creating pathways for qualified individuals with noncompetitive eligibility hiring status, including former Peace Corps volunteers and others, should also be explored.
- 2. Establish a dedicated team within RAIO focused on partnering with USCIS HR on hiring, onboarding, and people management.** In the current process, once HR professionals refer candidates to IRAD for further evaluation, the interviewers have to balance interviews and candidate evaluations in addition to their other core responsibilities.<sup>47</sup> The Asylum Division and IRAD already have dedicated teams focused on areas critical to carrying out the mission of RAIO, such as innovation and IT teams. With the rapid growth required, it will be critical to allocate a dedicated team within RAIO with the specific focus of continuously recruiting, interviewing, and onboarding ROs, independent of a specific job vacancy announcement.
- 3. Shift hiring approach from filing vacancies to continuous recruitment.** The current approach to filling an open RO position is to post the position online when a vacancy occurs and wait for candidates to apply. However, with the great need to increase the number of ROs and the continuous turnover that occurs within IRAD, it is inefficient to seek new candidates only when a vacancy occurs. Instead, a simplified application should continuously accept new applicants outside of USAJobs. While this approach is not typically taken for the recruitment of federal service positions, it is necessary to fill the specialized role of a Refugee Officer. This will build an active pipeline of qualified candidates and facilitate ongoing recruitment and training of incoming ROs.
- 4. Involve current ROs in candidate evaluation.** RO candidates who apply through USAJobs and are considered minimally qualified by USCIS HR are asked to complete a series of online assessments before having an interview with IRAD. Though the online assessments are a strong evaluation tool, one way to improve this process is by involving active ROs. ROs are not involved in the evaluation of candidates currently; however, they have the unique perspective

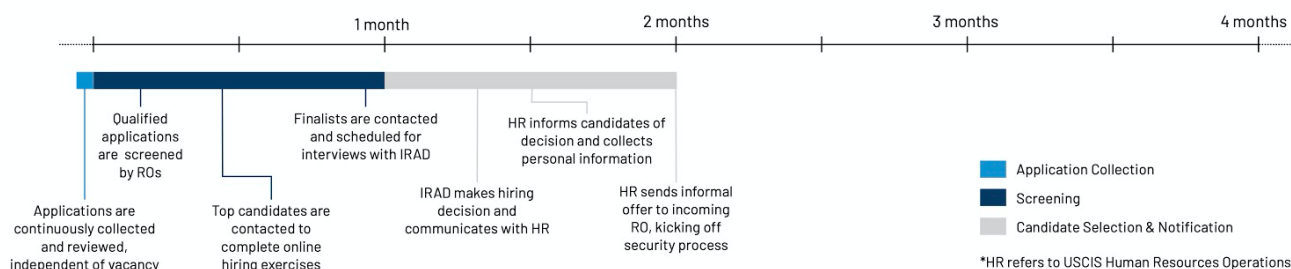
of having served in the field and have the best understanding of the emotional and technical skills required for the position. Through the Direct Hiring Authority, when candidates apply directly to the IRAD program, their application would initially be screened by the RAIO hiring team to ensure the candidate meets minimum qualification standards. ROs would then be invited to review qualified candidates' resumes, skills, and online assessment results to identify the most qualified individuals with skills sets that could contribute to IRAD. The applicants would then be invited to a final interview. This could be a task for ROs who are stateside and between circuit rides who are traditionally tasked with management and administrative tasks, in addition to completing regional trainings.

If USCIS was able to utilize direct hiring authority, establish a dedicated team within RAIO focused on hiring, onboarding, and people management, implement continuous recruitment, and involve current ROs in the candidate evaluation, the streamlined application collection and screening process could reduce the time between application to offer by half, as shown in the figure below.

### Current Refugee Officer Hiring Process



### Rapid Refugee Officer Hiring Process



## Improve Retention

ROs undergo intense training, deploy overseas for extended assignments, and work long hours to adjudicate refugee cases. The roles are physically and emotionally demanding, leading to early burn-out after two or three years and low morale.<sup>48</sup> Small adjustments would re-invest in professional development and improve the support of officers.



- 5. Hire ROs for tours of duty.** At the USDS, technical talent joins the federal government for a one to four year “tours of duty” with the expectation that they will likely return to their former field after their service.<sup>49</sup> Former ROs have shared that it was typical to join IRAD under the premise that it would not be a permanent career transition.<sup>50</sup> The RO position should not be a term-limited role, as ROs moving into other positions at USCIS and DHS is important. However, by advertising the role as a “tour of duty,” candidates would have a better understanding of the intensity and workload of the role.
- 6. Explore allowing ROs to function as a geographically distributed team when stateside.** Before COVID-19, ROs spent approximately six weeks of each quarter overseas on circuit rides. When they are stateside, ROs are stationed in Washington, D.C. where they complete cultural and security training along with completing other smaller tasks. As the entire workforce has been transitioned to remote work since March, it has shown USCIS that the stateside work can be accomplished remotely. Allowing for locational flexibility can be used as a tool for recruitment, decrease functional costs, and increase staff retention.
- 7. Create opportunities for long-term international deployments.** ROs are asked to constantly travel from Washington, D.C. to overseas Resettlement Support Centers, making it difficult to find week-to-week stability. There is both great need overseas and interest from current and former ROs to have the opportunity to be stationed overseas for one-year terms or longer, allowing them to conduct interviews and adjudicate cases outside of circuit rides. This would allow ROs an opportunity for professional development, provide a level of stability with reduced travel, and increase the capacity to adjudicate USRAP cases.
- 8. Strengthen paths for professional advancement.** Former ROs report a common frustration that there is the lack of a clear ladder of professional advancement within IRAD. In comparison to the Asylum Corps, which has Senior Officer positions that come with increased compensation, IRAD is viewed as having limited opportunities for professional growth in title only. Having a transparent path for professional progression would entice more ROs to remain in IRAD for longer while allowing for Senior Officers to be differentiated from others who could be specialized in adjudicating the most complex cases.
- 9. Promote regional specialization.** When an RO joins IRAD, some individuals come with deep expertise in a specific region but are not able to utilize those skills for several months because circuit rides are often allocated based on length of experience rather than area of expertise. This would not apply to every RO, but having the option to specialize on specific refugee populations and/or regions could improve job satisfaction, provide an opportunity for professional development, and minimize the number of repetitive trainings staff have to complete between circuit rides.

## Active Recruitment

A strong RO candidate with the specialized skills and experience is often found outside of federal service. However, many qualified candidates may not know the position even exists, requiring RAIO to identify and recruit top-qualified candidates to apply through long-term recruitment strategies utilizing other federal agencies.

**10. Actively recruit ROs.** As mentioned above, staff from RAIO should work to actively identify and source external high-quality candidates, educate them about the Refugee Corps, and encourage them to apply. Additionally, contracting with an external team to utilize long-term recruitment strategies seen in the recruitment of Foreign Service Officers, Peace Corps volunteers, and others, including pathway development and university recruitment, would allow IRAD to cultivate relationships with a wide pool of potential candidates while educating them about the mission and work of IRAD, rather than working to fill individual position openings.

**11. Publicize career opportunities to a wider audience.** A portion of ROs join IRAD from other USCIS offices; however, for a majority of ROs, this is their first position in federal service. Serving as an RO to support the USRAP and adjudicate refugee cases should be an opportunity as widely known as the Peace Corps or Foreign Service. The rebranding of IRAD would help with this effort, as would a public marketing campaign to raise awareness about the opportunity and encourage candidates to apply who would not have previously considered a tour in federal service. Because of the limited bandwidth within RAIO, creating a partnership with an external organization to support rebranding efforts and public engagement would be ideal. Additionally, at the beginning of a new administration, other federal departments, including the U.S. Department of State, will be taking on similar public engagement and recruitment approaches. Tapping into this momentum would allow for a greater impact.

# Endnotes

<sup>1</sup> Refugee Processing Center, “Admissions & Arrivals,” last modified September 30, 2020, <https://www.wrapsnet.org/admissions-and-arrivals/>.

<sup>2</sup> Biden for President, “The Biden Plan for Securing Our Values as a Nation of Immigrants,” December 11, 2019, <https://joebiden.com/immigration/>.

<sup>3</sup> Migration Policy Institute, “U.S. Annual Refugee Resettlement Ceilings and Number of Refugees Admitted, 1980–Present,” October 1, 2020, <https://www.migrationpolicy.org/programs/data-hub/charts/us-annual-refugee-resettlement-ceilings-and-number-refugees-admitted-united>.

<sup>4</sup> See, for example, Innovative Finance for Resettlement Working Group, *Using Innovative Finance to Increase Refugee Resettlement* (Washington, DC: Center for Global Development, 2020), <https://www.cgdev.org/publication/using-innovative-finance-increase-refugee-resettlement>.

<sup>5</sup> Kristie De Peña and Matthew La Corte, “The Devil is in the Details: Digging Deeper into 2020 Refugee Resettlement Changes,” Niskanen Center, November 18, 2019, <https://www.niskanencenter.org/the-devil-is-in-the-details-digging-deeper-into-2020-refugee-resettlement-changes/>.

<sup>6</sup> Andorra Bruno, *Refugee Admissions and Resettlement Policy* (Washington, DC: Congressional Research Service, 2018) <https://fas.org/sqp/crs/misc/RL31269.pdf>.

<sup>7</sup> House Judiciary Committee, “Statement of Barbara L. Strack, Hearing on The Current State of the U.S. Refugee Program, House Judiciary Committee Subcommittee on Immigration & Citizenship,” February 27, 2020, <https://www.congress.gov/116/meeting/house/110569/witnesses/HHRG-116-JU01-Wstate-StrackB-20200227.pdf>.

<sup>8</sup> National Archives and Record Administration, “Refugee Officer Scheduling System Request for Records Disposition Authority,” October 12, 2017, [https://www.archives.gov/files/records-mgmt/rcs/schedules/departments/departments-of-homeland-security/rg-0566/daa-0566-2017-0025\\_sf115.pdf](https://www.archives.gov/files/records-mgmt/rcs/schedules/departments/departments-of-homeland-security/rg-0566/daa-0566-2017-0025_sf115.pdf).

<sup>9</sup> Lara Jakes, “Under Trump, Iraqis Who Helped U.S. In War Are Stalled in Refugee System,” *The New York Times*, November 2, 2019, <https://www.nytimes.com/2019/11/02/world/middleeast/trump-refugees-iraq.html>.

<sup>10</sup> American Immigration Lawyers Association, “Tracking USCIS International Field Office Closures,” August 20, 2020, <https://www.aila.org/infonet/uscis-to-close-all-international-offices-by-2020#:~:text=USCIS%20announced%20that%20it%20will,public%20is%20June%2012%2C%202020>.

<sup>11</sup> U.S. Citizenship and Immigration Services, “International Operations,” last modified September 11, 2019, <https://www.uscis.gov/archive/international-operations>.

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