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Office of Inspector General  
United States Department of State

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ESP-23-01

Office of Evaluations and Special Projects

March 2023

# **Review of Challenges in the Afghan Placement and Assistance Program**

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# HIGHLIGHTS

Office of Inspector General  
United States Department of State

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## What OIG Reviewed

In 2021, the Department of State (Department) implemented the Afghan Placement and Assistance (APA) Program to facilitate the resettlement of Afghan nationals in communities around the United States in conjunction with nine resettlement agencies. The domestic resettlement framework implemented by the APA Program was influenced largely by the Reception and Placement (R&P) Program, a component of the U.S. Refugee Admissions Program (USRAP). The Afghans admitted through the APA are sponsored by the same nine resettlement agencies that participate in the R&P Program.

OIG initiated this review to examine the challenges faced by the nine agencies in implementing the APA Program and to identify any lessons learned for future resettlement efforts.

March 2023

OFFICE OF EVALUATIONS AND SPECIAL PROJECTS

## Review of Challenges in the Afghan Placement and Assistance Program

### What OIG Found

Resettlement agencies reported that the APA Program involved some of the most significant challenges that they had ever faced. Many of these challenges were external, such as the fast pace and large number of Afghan arrivals and the effects of the COVID-19 pandemic. Following the decrease in refugee admissions under the prior administration, many of the agencies and their affiliates did not have adequate staffing for the number of arrivals they were receiving and had to hire staff quickly to implement the APA Program. In addition, the fast pace of arrivals, the lack of available housing, difficulty obtaining necessary documentation for the APA participants, and minimal pre-arrival cultural orientation also presented challenges for resettlement agencies.

The resettlement agencies did report that the Department provided sufficient funding for the APA Program. The agencies also reported positive impressions of the coordination between the Department and other government agencies in implementing the APA Program.

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## OBJECTIVE

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On April 14, 2021, President Biden announced plans to complete the U.S. military withdrawal from Afghanistan by September 11, 2021. As the Taliban entered Kabul on August 15, 2021, Afghan President Ashraf Ghani fled the country, and the country's security forces collapsed. In response, the Department of State (Department) and Department of Defense (DoD) evacuated U.S. citizens, lawful permanent residents, allies including Afghan Special Immigrant Visa (SIV) applicants, and their eligible family members from Afghanistan.

On August 29, 2021, President Biden designated the Department of Homeland Security (DHS) as the leader of the coordinated efforts across the U.S. Government to resettle Afghan evacuees under Operation Allies Refuge (OAR) and Operation Allies Welcome (OAW).<sup>1</sup> The President also directed the Secretary of Homeland Security to establish a Unified Coordination Group (UCG), of which the Department, DoD, and the U.S. Departments of Health and Human Services (HHS), Justice, and Education are part.<sup>2</sup> DHS led the effort to process, screen, and vet Afghan nationals who had been evacuated from Afghanistan prior to arrival in the United States.<sup>3</sup> Once the Afghan nationals were permitted entry into the United States, the Department and HHS were chiefly responsible for their final resettlement.

In September 2021, the Department, as part of its OAW responsibilities, implemented the Afghan Placement and Assistance (APA) Program to facilitate the resettlement of Afghan nationals in communities around the United States. Following a similar resettlement model used by the Reception and Placement (R&P) Program (a component of the U.S. Refugee Admissions Program), the Department worked with nine resettlement agencies (RAs)<sup>4</sup> and their networks of 385 local agencies and partners across the country to resettle Afghans relocated to the United States. Through individual cooperative agreements, RAs were responsible for providing initial relocation support services and assisting relocated Afghans in their transition to the United States. RAs were responsible for providing material needs support and services for 30 to 90 days after the arrival of Afghans granted parole at their final destination (*i.e.*, resettlement location). Parole is a discretionary mechanism that grants foreign nationals entry into the U.S. and permission to remain for a designated period of time during which they may apply for lawful status.<sup>5</sup>

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<sup>1</sup> Memorandum on the Designation of the Department of Homeland Security as the Lead Federal Department for Facilitating the Entry of Vulnerable Afghans into the United States, 2021 DAILY COMP. PRES. DOC. 2 (Aug. 29, 2021) (*hereinafter* UCG Memo). OAR was the U.S.-led effort to airlift eligible, at-risk Afghans out of Afghanistan in July and August 2021. OAW was initiated by the UCG Memo and is the ongoing effort by the U.S. Government to resettle and integrate relocated Afghans in the United States.

<sup>2</sup> UCG Memo; Joint Strategy on Afghan Resettlement (2021).

<sup>3</sup> *Operation Allies Welcome*, DHS, <https://www.dhs.gov/allieswelcome>.

<sup>4</sup> The nine resettlement agencies are: Church World Service; Ethiopian Community Development Council; Episcopal Migration Ministries; HIAS; International Rescue Committee; Lutheran Immigration and Refugee Service; United States Conference of Catholic Bishops; U.S. Committee for Refugees and Immigrants; and World Relief.

<sup>5</sup> Parole is an extraordinary measure, sparingly utilized to permit an otherwise ineligible noncitizen to enter the United States for a temporary period due to an urgent humanitarian reason or for significant public benefit. 9 FAM

The large number of eligible Afghans and their simultaneous arrival raised substantial implementing challenges for the APA Program. The Office of Inspector General (OIG) undertook this review to examine the challenges faced by the RAs in resettling Afghans under the APA Program and how the Department was able to assist with these challenges. Because the APA Program was a limited term program that ended in 2022 and was created to deal with unique circumstances, this information report provides a summary of lessons learned but no recommendations for corrective action. Nonetheless, OIG believes that these lessons could be applied to future situations involving a surge of refugees or evacuees in the United States.

## **BACKGROUND**

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Most Afghans who were evacuated from Afghanistan initially were brought to other nations in the Middle East and Europe. DHS led the effort to conduct the screening and vetting of these Afghans prior to their arrival in the United States as part of its August 23, 2021, decision to grant parole into the U.S. for a period of two years to Afghan nationals who were at various stages of SIV processing, as well as those who were eligible to apply for an SIV but had not yet applied at the time of evacuation.<sup>6</sup> The vast majority of Afghans resettled in the United States following the evacuation were parolees, many of whom had SIV applications in progress.<sup>7</sup>

Once the Afghans arrived in the U.S., they were initially housed at military installations—referred to as “safe havens”—at which they completed processing requirements, including medical screenings, obtained work authorization approval, and were connected to RAs for initial resettlement assistance under the APA Program, a new program formed in 2021 and modeled after the existing R&P Program framework.<sup>8</sup> The Department oversaw this portion of the resettlement process and worked with the RAs to assign each Afghan to one of the nine RAs.

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202.3-2(A). Once paroled, Afghan nationals must apply for and receive lawful status in the United States through obtaining an SIV, being granted asylum, obtaining a Green Card, or another visa process. 9 FAM 202.3-2(B)(a).

<sup>6</sup> 8 U.S.C. § 1182(d)(5). This authority was delegated to the Secretary of DHS by section 402 of the Homeland Security Act of 2002. Pub. L. No. 107-296.

<sup>7</sup> Between July 30, 2021, and November 15, 2021, 70,192 Afghan nationals were paroled into the United States while only 3,290 Afghans were admitted under the SIV program. DHS, Department of Homeland Security Operation Allies Welcome Afghan Evacuee Report, December 2021 4, 6-7 (2021).

<sup>8</sup> Unlike the APA Program, which serves Afghans granted humanitarian parole into the United States, the R&P Program was set up to serve individuals granted refugee status (and SIV holders, who were later granted access to the program). Managed by the Department’s Bureau of Population, Refugees, and Migration, the R&P Program provides initial support over a period of 30 to 90 days to help refugees and SIV holders begin their new lives in the United States. A refugee is a person outside their country of nationality who is unable or unwilling to return to his/her country for fear of persecution or persecution based on race, religion, nationality, membership in a particular social group, or political opinion. 8 U.S.C. § 1101(a)(42). Once granted refugee status, an individual may begin the process of obtaining lawful permanent residence in the U.S. and is eligible for resettlement assistance from an RA. In contrast, a parolee has only temporary authority to reside in the U.S. and is not eligible for resettlement assistance under the R&P Program, but Afghan parolees are eligible for resettlement benefits under the APA Program.

The Bureau of Population, Refugees, and Migration (PRM) signed new cooperative agreements with the 9 RAs in order to implement the APA Program.<sup>9</sup> Under these agreements, RAs receive a per capita grant of \$2275 per eligible individual resettled, of which \$1225 is for direct assistance, such as the procurement of housing, essential furnishings, food, and clothing.<sup>10</sup> Additionally, RAs provide cultural orientation and referrals to social, medical, and employment services, as needed. RAs also help parolees enroll their children in school, obtain required documents needed for employment, and apply for government assistance programs like the Supplemental Nutrition Assistance Program. The Office of Refugee Resettlement within HHS (HHS/ORR) works through the states and non-governmental organizations to provide longer-term funds and medical assistance, as well as English language training, employment, and social services.

While the cooperative agreements under the APA Program are similar to those under the R&P Program, there are some significant differences. For example, the cooperative agreements for the APA Program required RAs to provide assistance with accessing immigration legal services to apply for asylum or another legal status to remain in the U.S. following the period of parole. PRM also incorporated many flexibilities into the APA Program that are not available to RAs under the R&P Program. For example, the APA Program allowed RAs to use temporary housing options, such as hotels or other short-term rentals. PRM also extended timelines for some initial relocation support services, such as health screenings, school registration for children, and enrollment in employment services and English language programs. Additionally, PRM opted to reduce required monitoring, through which it ensures that RAs are providing the required services to clients,<sup>11</sup> so that RAs and affiliates could focus on the resettlement efforts, while still ensuring sound services and financial stewardship.

As of August 2022, approximately 72,000 Afghans have been resettled under the APA Program. A comparison between annual refugee admissions and APA resettlements is shown in Table 1.

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<sup>9</sup> Unlike the R&P Program—which is budgeted and requested for annually by the Department—the APA Program was funded through several disbursements of refugee-related discretionary funds by the President following appropriations by Congress.

<sup>10</sup> The remaining \$1,050 of the grant is for administrative funding to cover the expenses of the affiliates, including affiliate staff salaries and benefits, support positions to coordinate volunteers and develop resources for the APA Program, delivering cultural orientation, and/or otherwise improving the quality of the APA services provided to clients.

<sup>11</sup> In the R&P Program, RAs must perform a regular onsite monitoring visit of each of its affiliates to ensure compliance with R&P requirements.

**Table 1: Annual Refugee Admissions from FY2014 to FY2021 and APA Resettlements from August 2021 to August 2022**

<b>Refugee Admissions</b>	<b>Number of Resettlements</b>
Refugee Admissions FY14	69,987
Refugee Admissions FY15	69,933
Refugee Admissions FY16	84,994
Refugee Admissions FY17	53,716
Refugee Admissions FY18	22,616
Refugee Admissions FY19	30,000
Refugee Admissions FY20	11,814
Refugee Admissions FY21	11,411
APA Resettlements 08/21-08/22	72,627

**Source:** OIG analysis of PRM documentation.

## FINDINGS

### Resettlement Agencies Faced a Multitude of Challenges in Resettling Afghans

RA officials told OIG that the APA Program involved some of the most significant challenges that they had ever faced. Many of these challenges were external, such as the fast pace and large number of arrivals and the effects of the COVID-19 pandemic. In addition, many of the RAs—which also support refugees under the R&P Program—had decreased in size, given the decrease in refugee admissions in the prior administration, and the RAs had to hire staff quickly to implement the APA Program. Although each RA faced a unique set of challenges, the issues described in the sections below were identified by a substantial number of RAs. They include issues related to arrivals, housing, documentation, cultural orientation, staffing, program guidance, tracking systems, and medical care. The following table summarizes the challenges OIG identified, and the subsequent text provides additional information on each of the 8 challenge areas.

**Table 2: Challenges Faced by Resettlement Agencies in the Afghan Placement and Assistance Program**

<b>Challenge</b>	<b>Description</b>	<b>Suggestions from RAs</b>
Arrivals	The pace and volume of arriving Afghans stretched the capacity of RAs.	<ul style="list-style-type: none"> <li>Greater use of planned departure reports</li> </ul>
Housing	The pandemic, the fast pace of arrivals, the larger size of Afghan families, and the demand among Afghans to live in certain geographical areas made finding permanent housing difficult.	<ul style="list-style-type: none"> <li>Greater flexibility in placing Afghans</li> <li>Adjustment of per capita housing grant to account for regional differences in housing costs</li> <li>Greater engagement with other federal agencies (HUD, FEMA, etc.)</li> <li>Informational campaign to educate landlords about housing refugees and parolees</li> </ul>

<b>Challenge</b>	<b>Description</b>	<b>Suggestions from RAs</b>
Documentation	RAs experienced great difficulty in timely receiving employment authorization documents for Afghans.	<ul style="list-style-type: none"> <li>• Better coordination between PRM and other federal agencies</li> </ul>
Cultural Orientation	Inconsistencies in the cultural orientation provided to Afghans led to unrealistic expectations by APA participants.	<ul style="list-style-type: none"> <li>• Standardized minimum requirements for cultural orientation</li> <li>• Emphasis on self-sufficiency and societal expectations for behavior regarding gender, race, and sexual issues</li> <li>• Use of town halls at safe havens</li> </ul>
Staffing	RAs had difficulty in quickly hiring staff to handle the APA program, especially after the decrease in admissions in the prior administration.	<ul style="list-style-type: none"> <li>• Mental health resources for RA staff</li> </ul>
Program Guidance	The lack of timely and consistent guidance from PRM caused compliance challenges for RAs.	<ul style="list-style-type: none"> <li>• Greater use of the Unified Coordination Group</li> </ul>
Tracking Systems	Hummingbird, the system used by PRM to track APA participants, lacked necessary information and documents.	<ul style="list-style-type: none"> <li>• Greater input of RAs in designing systems</li> </ul>
Medical Care	Many parolees arrived with mental and physical health issues, including many suffering from critical health issues that required immediate and extensive treatment, which was often difficult to arrange.	<ul style="list-style-type: none"> <li>• Greater access to medical data by RAs</li> <li>• Consistent and reliable health screening prior to placement</li> </ul>

### **Arrivals**

Every RA told OIG that the pace and volume of arrivals presented a substantial challenge. Under the R&P program, RAs typically received significantly longer advance notice of a refugee's arrival. RAs told OIG they were typically notified of a refugee's arrival at least seven days prior to actual arrival in the United States. The RA (via its affiliate) would use this time to locate housing, prepare it for the refugee's arrival, and arrange for pick-up at the airport. In comparison, RAs told OIG that they sometimes received as little as 72 hours' notice of an APA parolee's arrival. This was simply not enough time to arrange for housing, stock the house with food and clothing and other necessities, and schedule a medical screening. In addition, one RA told OIG that arrivals would often occur on religious holidays, which the RA felt was insensitive because many RAs are faith-based organizations.

The RAs told OIG that the volume of parolees was also substantially higher than under the R&P Program. As shown in Table 1 above, the nine RAs resettled 11,840 refugees in fiscal year 2020, compared to approximately 72,000 Afghans that they were responsible for resettling in the first 12 months of the APA Program. RAs stated that they were usually assigned a single refugee or

family at a time, whereas it was not uncommon for 70 Afghans to arrive in a single day; RAs had not seen such high levels of resettlements in years, if ever.

Eventually, PRM came up with a strategy to give the RAs planned departure plans (PDP), which allowed them to see when parolees were scheduled to fly. Once they received the PDPs, the RAs and their affiliates were better equipped to plan for each arrival. The parolees were also grateful for the planned departures because it informed them when they would leave and where they would be resettled. Nonetheless, nearly every RA described the rapid pace as unsustainable, which led to employee burnout and attrition, which is described in greater detail in the staffing section.

### ***Housing***

All of the RAs described the lack of permanent housing as a major challenge in resettling Afghan parolees. From the beginning of the APA Program to November 2021, RAs were responsible for using Hummingbird, the system that PRM used to track parolees, to select parolees to be resettled. After November, PRM assigned parolees to RAs based on their location preference and the locations in which the RAs had affiliates who could resettle them. After a parolee was assigned to an RA, its affiliate in the relevant location would be responsible for locating housing. The cooperative agreements between the Department and the RAs require them to ensure that the parolees assigned to it are “upon arrival and for a period of not less than thirty (30) days after arrival, [provided] decent, safe, and sanitary housing based on federal housing quality standards or local or state standards if local or state standards are higher than federal standards.” The Department provides a per capita grant to the RA for the material needs of each APA participant, which includes housing.

The RAs told OIG that housing availability has always been a challenge, but it was exacerbated by the pandemic, the fast pace of arrivals, the larger size of Afghan families, and the demand among Afghans to live in certain geographical areas.

According to several RAs, the pandemic decreased the supply of available housing at nearly the exact time that the surge of arrivals began.<sup>12</sup> As noted earlier, the APA participants arrived in larger numbers and in a more compressed time period than did refugees that the RAs typically serviced, which further decreased the supply of available rental housing. RAs also reported that several areas were particularly in-demand for APA participants, such as Northern Virginia and California, largely because of the location of Afghan immigrant communities. However, the housing supply in these communities was quickly exhausted and RAs were unable to honor requests to settle in these communities unless the participants had immediate family members

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<sup>12</sup> Fewer new homes were built from 2008 to 2018 than in any decade since the 1960s. By 2019, the shortage of housing units for sale or rent was estimated to be 3.8 million. The pandemic-induced materials and labor shortage exacerbated the trend, as evidenced by the surge in rents and home prices in 2021. *U.S. Housing Shortage: Everything, Everywhere, All at Once*, Jeffrey Hayward, Executive Vice President and Chief Administrative Office, Fannie Mae Corporation, October 31, 2022. <https://www.fanniemae.com/research-and-insights/perspectives/us-housing-shortage>.

already living there. RAs reported that in many cases, the only areas with available housing were those in which participants were not interested in settling.<sup>13</sup>

The increasing corporate ownership of rental property added to the housing challenge. Most RAs have established relationships with some landlords, and those landlords understand the unique challenges of housing refugees, such as lack of documentation, salary history, and credit scores. However, much of the housing owned by these landlords was exhausted early in the APA program, and RAs had difficulty getting corporate owners to be flexible with their rules. DHS performed outreach and provided information to landlords explaining the APA program to landlords which was helpful, although some of the information was inaccurate. According to one RA, DHS wrongly told landlords that APA clients had guaranteed housing funds for a year. Some states and localities helped with this challenge. Oklahoma offered one-year of free housing by using federal COVID-19 relief funding. Iowa, Colorado, and other states found ways to use state-level funding to assist arriving Afghans with housing. Some localities sent a letter to landlords guaranteeing rent for 6 months to a year, using local funds.

Because of limited supply, all of the RAs had to use temporary housing, such as hotels, vacation rental properties, and long term stay rentals, to initially house APA participants. However, temporary housing created its own set of challenges. It limited the ability of students to register for school, because school registration is tied to residency. The lack of a permanent address also complicated the search for employment or the ability of participants to be mailed documentation allowing them to seek employment. Also, some temporary housing did not have kitchens which required more funds to ensure participants had adequate meals. Finally, some of the temporary housing was nicer than the permanent housing, which created unrealistic expectations on the part of some participants.

In order to alleviate pressure on RAs, PRM implemented several flexibilities through the course of the APA Program. For example, PRM instituted the Housing on Demand program, which utilized a contractor to locate short-term housing for APA participants for up to 90 days and provided additional funds for RAs to pay for temporary housing for Afghan parolees for up to 90 days. These funds were in addition to the direct assistance made available through the per capita grant, much of which is generally used to pay housing costs. RAs told OIG that these flexibilities were very helpful in dealing with the permanent housing shortages.

To utilize potential housing options outside of the normal service area of RAs or their affiliates, PRM eliminated the affiliate placement radius: a requirement that affiliates may only place and serve APA participants within a 100-mile, same-state radius.<sup>14</sup> Through the APA Flexible

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<sup>13</sup> In such cases, the parolees would often decline resettlement assistance, a term known as “out-migration.” One RA told OIG that it had a significant number of out-migrations even before parolees got to the RA because the parolees were not assigned to relocate to places that they desired.

<sup>14</sup> RAs could also use community partners to settle participants outside of the radius. The cooperative agreement defines a community partner as “an established organization, community sponsor, or co-sponsor ... which has

Placement Service Plan, an RA wishing to serve a case outside of the 100-mile, same-state radius must demonstrate sufficient oversight by the affiliate and ensure the larger placement area will not impair the quality of the services provided to APA program beneficiaries. At least one RA, however, described this flexibility as of limited utility, because the RA or affiliate staff had difficulty in servicing APA participants if they were housed at such distances.

RAs told OIG that by the time of this review, most of their clients had found permanent housing and some of the supply issues had eased. Several states had provided agencies with additional funds to extend housing support for several months, which they found very helpful.<sup>15</sup>

RAs did suggest several other ways that the Department could help to mitigate the housing challenges. For example, they suggested that PRM grant them flexibility to move parolees to areas outside the Flexible Placement Service Plan that were less in demand. Another suggestion was to adjust the per capita grant based on location to account for the differences in housing costs in certain areas. RAs also recommended that the Department engage with other agencies such as the Department of Housing and Urban Development (HUD) and the Federal Emergency Management Agency (FEMA) to expand housing options. For example, FEMA has a large supply of trailers that it uses as temporary housing for victims of natural disasters. Finally, an RA suggested that the Department could conduct a grassroots campaign to educate landlords about resettling refugees, which would assist with some of the uncertainty that they faced in dealing with corporate landlords.

### ***Documentation***

RAs told OIG that another challenge faced in resettling Afghan parolees was documentation delays or inaccuracies. RAs experienced issues in helping Afghan parolees get Employment Authorization Documents (EADs) and Social Security numbers (SSN), both of which are used for employment eligibility and to apply for certain government services.<sup>16</sup> The International Organization for Migration (IOM) helped to distribute EADs and SSN cards to parolees after departure from safe havens.<sup>17</sup> According to RAs, parolees faced delays in IOM's distribution of EADs due to IOM staffing shortages and the large number of resettlements. IOM sent some employment documents to the wrong location because of incorrect resettlement addresses. Also, some Afghans were issued EADs with errors that required returning the documents and requesting a correction. Without EADs and SSN cards, parolees were not able to obtain employment, secure permanent housing, or enroll in government services, such as the

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accepted in a written agreement with the national Resettlement Agency responsibility to provide, or ensure provision of, APA Program services to certain beneficiaries sponsored by the national resettlement agency."

<sup>15</sup> These funds were primarily provided by support to the states from HHS/ORR.

<sup>16</sup> Admitted refugees also require these documents, so the difficulty faced by RAs in obtaining them likely affects that population as well.

<sup>17</sup> IOM provides a variety of overseas processing services under a Memorandum of Understanding with PRM. 9 FAM 203.3-3(c)(1). PRM issued an additional voluntary contribution award to IOM on October 1, 2021, to, in part, "fund certain activities in providing support to urgent and unexpected refugee and migration needs of refugees, victims of conflict, and other persons at risk as a result of the situation in Afghanistan."

Supplemental Nutrition Assistance Program. RAs reported that getting and correcting documentation was very time consuming for affiliate staff and used up valuable resources for both affiliates and RAs. One RA told OIG its local affiliate staff had to deliver food to its clients because they lacked proper documentation to enroll in state or federal nutrition assistance programs. RAs highlighted that the resettlement program is based on clients becoming economically self-sufficient, which clients cannot do if they lack documents required for employment. RAs pointed out that parolees could not simply walk into local Social Security offices to get needed SSN cards because local offices had not been informed as to what documentation was acceptable to issue these cards and many offices have had limited hours and staff due to the pandemic or did not accept walk-ins.

Some RAs also described problems with parolees obtaining their I-94 forms required by the U.S. Customs and Border Protection (CBP) upon arrival to the United States.<sup>18</sup> RAs also said that many parolees had to visit a CBP office to replace an I-94 form or submit to a required CBP inspection but traveling to an inspection site proved to be insurmountable for many parolees. For example, an RA affiliate in Austin, Texas received approximately 900 clients, all of whom had to get to the CBP inspection location in Houston, Texas (over 160 miles away) to get their I-94 forms. The RA said that resolving this issue required an inordinate amount of coordination with PRM and CBP.

Some RAs said that PRM was helpful in connecting them with points of contact to work on resolving documentation issues. However, most RAs believed that better coordination between PRM and other agencies, particularly the Social Security Administration (SSA), could be beneficial. The UCG initiated weekly meetings with the RAs to assist with common challenges, but RAs told OIG that SSA did not consistently have a representative attend the meetings, so they were of limited assistance in resolving SSA documentation challenges.

### ***Cultural Orientation***

Individuals entering the United States with refugee status under the R&P Program receive cultural orientation training to provide them with the vital knowledge, skills, and attitudes they need to adapt to their new lives in this country and to achieve self-sufficiency.<sup>19</sup> This is a mandatory component of the R&P Program.<sup>20</sup> Cultural orientation is provided to refugees both prior to their departure for the United States and after their arrival.<sup>21</sup>

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<sup>18</sup> The I-94 form is the DHS Arrival/Departure Record issued to aliens who are admitted to the United States, who are adjusting status while in the United States, or extending their stay, among other things.

<sup>19</sup> U.S. Department of State, U.S. Department of Homeland Security, and U.S. Department of Health and Human Services, *Report to the U.S. Congress, Proposed Refugee Admissions for Fiscal Year 2022*, September 20, 2021.

<sup>20</sup> Government Accountability Office, *Afghan and Iraqi Special Immigrants, More Information on Their Resettlement Outcomes Would Be Beneficial* (GAO-18-107, February 2018).

<sup>21</sup> U.S. Department of State, U.S. Department of Homeland Security, and U.S. Department of Health and Human Services, *Report to the U.S. Congress, Proposed Refugee Admissions for Fiscal Year 2022*, September 20, 2021.

Pre-departure cultural orientation is offered by overseas Refugee Support Centers (RSCs) and usually takes place one week to three months before departure and is tailored to the local context of their place of origin. Pre-departure training emphasizes the need for early employment and self-sufficiency and includes topics such as the American health and education systems, typical housing situations, rights and responsibilities in relation to their resettlement process, and legal issues regarding obtaining lawful permanent resident status and U.S. citizenship.<sup>22</sup> Post-arrival cultural orientation is provided by RA staff. Post-arrival cultural orientation focuses on specifics relevant to a refugee's resettlement location, and focuses on the following topics:

- Role of the RA
- Community Services and Public Assistance
- Housing
- Transportation
- Employment
- Education
- Health and Hygiene
- Budgeting and Personal Finance
- Cultural Adjustment
- U.S. Laws and Refugee Status<sup>23</sup>

Unlike the R&P Program, where cultural orientation is provided before and after arrival in the United States, cultural orientation under the APA program was far less structured. The safe havens did not have standardized cultural orientation, nor did PRM mandate it for parolees at the safe havens. Thus, RAs were generally responsible for providing all cultural orientation to parolees. The cooperative agreements required the RAs and their affiliates to provide "basic cultural orientation" upon arrival. Delivering effective cultural orientation to the Afghan arrivals was difficult, especially when no precursor orientation had been given and unrealistic expectations had already developed. One RA stated that the agency's affiliates were aware cultural orientation was necessary, but there was no standard for what was to be covered, so each affiliate provided different levels of cultural orientation. Several RAs told OIG that this lack of effective cultural orientation was a significant challenge and led to further challenges in the resettlement process.

One challenge created by the lack of cultural orientation was many parolees arrived holding unrealistic expectations regarding the resettlement process. For example, several RAs stated that Afghans who had worked with the American military in Afghanistan were reportedly told by their U.S. military colleagues that the U.S. government would give them "welcome money" when they arrived. Parolees often did receive cash from their per capita funding allotment, however, this amount differed depending on the location of the parolee and the associated

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<sup>22</sup> U.S. Department of State, U.S. Department of Homeland Security, and U.S. Department of Health and Human Services, *Report to the U.S. Congress, Proposed Refugee Admissions for Fiscal Year 2022*, September 20, 2021.

<sup>23</sup> Cultural Orientation Research Exchange, *Making Your Way: A Reception and Placement Orientation Curriculum*.

costs of living, among other factors. Also, many parolees had unrealistic expectations regarding housing and consequently rejected the housing provided to them as being insufficient to meet their needs or of an inferior quality.

RAs also reported that parolees held unreasonable expectations regarding employment prospects. Afghans who had worked as professionals or held advanced degrees in Afghanistan often believed that they would be set up in positions within their chosen field upon arrival. However, RAs reported that common initial jobs for Afghan parolees included drivers for ride-sharing services like Uber and Lyft, airport workers such as luggage handling and food service, security guards, low-level information technology workers such as cell phone assembly or temporary technicians, or warehouse workers such as inventory or stocking. For example, a parolee who had worked as a civil engineer for 6 years in Afghanistan was unable to obtain a job commensurate with his education. Instead, he took a job assembling cell phones, which was disappointing for him given his years of experience and education.

Some parolees also held unrealistic expectations as to what their respective case managers could do for them on a day-to-day basis. For example, some asked their case managers to perform everyday tasks, such as small home repairs or providing tours of their neighborhood, which are not tasks provided for by the APA Program.

The unrealistic expectations among the parolees unmitigated by effective pre-departure or post-arrival cultural orientation training placed further burden on already-pressed local affiliate staff and case managers who had to provide ad-hoc cultural orientation. One RA assessed that the lack of cultural orientation led to an increase in complaints from parolees about case managers, which mostly concerned the case manager not providing something that the parolee wanted but was not included in the APA program.

RAs also attributed some inappropriate behavior on the part of parolees to the lack of cultural orientation. For example, some RA staff reported experiencing racism and sexism from Afghan clients unaccustomed to the norms of U.S. society. Another RA reported that some parolees refused to work with female case managers or case managers from minority groups. One RA reported that a few local offices had issues of verbal abuse from Afghans, mostly those who were upset or frustrated by the process. Many parolees had very high expectations and did not understand the role of local affiliates and would become frustrated with services and housing.

The RAs provided several suggestions as to how PRM could address this challenge, even in emergency situations such as those that preceded the APA Program. These included standardized minimum requirements for cultural orientation that emphasize self-sufficiency, manage expectations, and convey U.S. societal expectations for behavior regarding gender, race, and sexual issues. Although some safe havens provided voluntary cultural orientation, one RA noted that the military bases that housed the Afghans could have offered a mandatory “town hall” or designated a community area to disseminate information on the resettlement process and U.S. society and to promote settlement locations with available space.

**Staffing**

RAs rely heavily on government funding for their operations – principally the per capita grant that they are paid per refugee that they resettle. Because of the decrease in refugee admissions during the previous administration, the RAs received decreased funding, which had required them to decrease their staffing levels prior to the APA Program. The funding allocated for USRAP is presented in Table 3.

**Table 3: Funding Allocated to PRM for USRAP, FY16 to FY21**

<b>Fiscal Year</b>	<b>Funding Allocated (\$ in thousands)</b>
2016	462,700
2017	445,000
2018	203,800
2019	306,000
2020	251,000
2021	232,900

**Source:** OIG analysis of Congressional Budget Justifications FY 2017 to FY 2022

After the initiation of the APA Program, RAs had to quickly pivot to increase their staff to meet the demands of the program. One RA told OIG that the APA could not have come “at a worse time” because the drawdown in refugees had left most agencies with limited capacity. Many RAs operated with significant deficits because their staff could not keep up with the accelerated pace of the resettlement arrivals.

Although PRM provided sufficient funding to RAs to hire staff to meet the APA Program demands, it was difficult to hire and retain staff. Resettlement personnel require specific experience and skills which are developed over time. For example, a case manager position requires a bachelor’s degree in human services, social work, or a related field and fluency in Dari, Farsi, and Pashto. A case manager has significant responsibility, including arranging pre-arrival and post-arrival services, housing, and governmental benefits, and often requires availability 24 hours a day, 7 days a week. The RAs either got few applicants or applicants with no experience, requiring their already-overworked employees to provide training to the new employees. RAs had to compete with one another to meet staffing needs during a period of time when there was a general labor shortage. As the APA Program was a limited-term program, one RA told OIG that it (as well as its affiliates) could only offer six-month positions, which made attracting applicants difficult.

Many RAs used their staff working in their R&P Program for the APA Program and divided their new employees between the APA and R&P Programs so that the new staff could be moved to the R&P Program after the APA Program ended. Some RAs reported that they now have sufficient staff, while others were still struggling with hiring. For example, one RA reported it is operating with a 20 percent deficit in staff.

Attrition was also a huge concern. Nearly every RA told OIG that during the first several months of the APA Program, their staff and their affiliate staff were overwhelmed with the pace of the arrivals. Staff reported working 14 hours a day, 7 days a week to keep up with the pace of arrivals, which was both mentally and physically difficult and often culminated in burnout and attrition. For example, one RA told OIG that its affiliates experienced an unprecedented 20 percent attrition rate in less than a year.

To assist with this challenge, RAs suggested that PRM could offer mental health resources for RA and affiliate staff. For example, one RA hired a resiliency coordinator to assist their staff with these types of issues.

### ***Program Guidance***

Several RAs told OIG that the guidance they received from PRM has been a continuing challenge. The primary source of guidance for RAs is the cooperative agreement. One RA told OIG that PRM amended the cooperative agreements multiple times between September 2021 and February 2022. Sometimes the RA received a cooperative agreement that was contrary to the one it had just signed. Each time a change was made, it had to be communicated to all affiliates, and ensuring that all guidance in the field was up to date was a challenge.

For example, in one such amendment, PRM modified the definitions associated with community sponsorship and community partner, which changed the requirements for local organizations who could assist with providing services to parolees. These changes affected affiliates' ability to rely on local organizations that were interested in volunteering to help the Afghan resettlement effort.

PRM also provided guidance to RAs in memoranda and in the weekly teleconference of the UCG. While RAs expressed some frustration in how long it took PRM to provide some of this informal guidance, they did universally praise the weekly UCG calls as critical in facilitating communication between multiple agencies in order to resolve issues. However, as noted above in the discussion of Social Security documentation, the effectiveness of the weekly teleconferences was hindered when agencies did not consistently participate.

### ***Tracking Systems***

In July 2021, PRM worked with the Bureau of Information Resource Management to expand the use of a case tracking system called Hummingbird to track the resettlement efforts of SIV holders and other Afghans evacuated from Afghanistan. Hummingbird is a cloud-based system that tracked Afghans from initial processing to eventual assignment to a RA under the APA Program. Hummingbird contains limited biographical data, case tracking information, and information regarding where the individual or family unit want to be resettled. According to PRM officials, Hummingbird does not collect documents generated by various agencies that had responsibility for steps in the admission and resettlement process, but instead is meant to provide a check-the-box tracker to ensure steps are completed. DHS took over ownership of the

Hummingbird system in March 2022 after all Afghans who had been brought to safe havens within the United States had been assigned to an RA.

RAs all discussed challenges with using Hummingbird at the initiation of the APA Program, specifically that the system lacked information necessary for them to apply their typical methodology to place families. For example, many RAs said that Hummingbird did not provide medical information so that affiliates could find adequate housing to accommodate a disability or place clients near needed medical services. Additionally, RAs said that missing or incorrect information in Hummingbird meant that some Afghans who were ineligible for APA benefits mistakenly received them. For example, RAs explained that a family unit could consist of those who are eligible for APA benefits and those who are not because they are legal permanent residents. Many RAs had a difficult time figuring out the relationship of adults and minor children in some family units because Hummingbird did not provide sufficient data on family connections. RAs spent substantial time determining various relationships and confirming the immigration status so they could advise affiliates on allowable benefits.

RAs also faced difficulty with Hummingbird's usability in the first six months of the APA Program. RAs said that while they could access case information, they could not share the information with the affiliate responsible for resettlement. RA staff had to spend time manually extracting information from Hummingbird and then sending it to affiliates. Additionally, the RAs said that the assurance process, which is the process by which an RA and its affiliates commit to providing initial reception and placement services for an individual or family, was at first ad hoc and arduous. RAs said that they had to go into the Hummingbird system and choose the cases they could assure, but starting in November 2021, PRM began batching assignment of cases to RAs.

The RAs did commend PRM for listening to their concerns about Hummingbird and making improvements to make it more user-friendly and providing more useful data to RAs. Some RAs specifically noted that the addition of a new data field for the planned departure period in Hummingbird, providing the date the parolees would depart from the safe havens, gave their agencies much more time to plan and prepare for resettlement. Most of the RAs said they would like to be considered a stakeholder in the development process for the Department's data systems that track parolee and refugee resettlement moving forward. For example, while many said that PRM took their concerns seriously and made improvements, soliciting feedback at the outset could have ensured that needed information was available earlier in the process. RAs told OIG it would be helpful to provide input on what data is made available to them and how that data is shared with affiliates and community partners.

### ***Medical Care***

Due to the pace and volume of arrivals, RAs stated that providing sufficient medical care to all parolees was a significant challenge. At the beginning of the APA Program, parolees were eligible only for an initial medical screening at the military bases. The cooperative agreements between PRM and the RAs do not provide designated funding for medical screening; they

require only that the agencies and their affiliates ensure parolees receive assistance in accessing the health screening and services to which the participants are eligible.

Many parolees arrived with mental and physical health issues, including many suffering from critical health issues that required immediate and extensive treatment. Some parolees arrived with COVID-19 or were pregnant or had given birth very recently. Besides moving into an unfamiliar environment with cultural differences, many participants also had experienced trauma in Afghanistan, separation from their families, and were suffering from depression when they arrived. RAs were not always aware of these issues because of the lack of medical information about arriving Afghans.

The RAs had difficulty meeting the health care needs of parolees. Many of the clinics performing refugee medical screening had closed because of the decrease in number of refugee admissions in the prior administration. Mental health care capacity was also limited in many resettlement locations, and it was particularly difficult to find providers with the appropriate language skills and cultural background to provide effective mental health care. Even when such care was available to parolees, many did not believe that they were necessary or effective in treating mental health issues.

In September 2021, Congress extended to parolees eligibility for Refugee Medical Assistance health benefits, which provides the same medical coverage as does Medicaid.<sup>24</sup> One RA described this coverage it as a “game changer.” Another RA took advantage of an ORR-funded Preferred Communities program that provides supplemental assistance to individuals with special needs, including mental health care needs.

The RAs also offered some additional recommendations for how PRM could mitigate challenges to providing appropriate medical care in future emergency relocation scenarios. Ensuring RA access to medical data for every refugee or parolee was an almost universal suggestion. In addition, RAs believed that consistent and reliable health screening, to include mental health screening, for all arrivals from the beginning of program inception is critical.

## **Resettlement Agencies Reported That the Department Provided Sufficient Funding for the APA Program and Engaged in Effective Coordination**

While the RAs faced many challenges in implementing the APA Program, they also recognized that many of the challenges were beyond the control of PRM and were complimentary of PRM’s partnership, particularly funding and interagency coordination.

### ***Funding***

Unlike the R&P Program—which is budgeted and requested for annually by the Department—the APA Program was funded through several disbursements of refugee-related discretionary funds by the President following appropriations by Congress. Presidential Determinations 2021-

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<sup>24</sup> Extending Government Funding and Delivering Emergency Assistance Act, P.L. 117-43 § 2502 (Sept. 30, 2021).

09 and 2021-11 authorized the use of up to \$600 million in Emergency Refugee and Migration Assistance (ERMA) funding to assist those evacuated from Afghanistan.<sup>25</sup> Another Presidential Determination, 2022-03, issued on October 22, 2021, authorized the release of up to an additional \$976.1 million from ERMA for the purpose of meeting urgent refugee and migration needs to support OAW and related efforts by the Department.<sup>26</sup> A fourth Presidential Determination, 2022-09, authorized up to \$1.2 billion from ERMA in February 2022.<sup>27</sup>

The RAs generally agreed that overall funding for the APA Program was sufficient. From the beginning of the APA Program, the expectation was that PRM would fund full resettlement capacity, which has not always been the case for the R&P Program in years where arrivals were lower than the refugee admissions target. This was particularly helpful as it provided greater clarity as to exactly what resources would be available and eliminated some of the funding uncertainty present in the R&P Program.<sup>28</sup> However, one RA did report that additional flexibility in the deadlines for submitting reimbursement requests would have been helpful. Many RAs were challenged to submit such requests on time given the demands of the APA Program.

RAs also received assistance from additional private and public sources, including several state governments that provided supplemental funding. For example, Oklahoma utilized COVID-19 relief funding to assist parolees. Private donations were a significant source of funding for the APA Program. RAs reported significant assistance from large corporate donors. One RA reported that support for all of its walk-in APA participants was funded exclusively by private donors. Other RAs reportedly received significant support from religious organizations associated with the agency or with their local affiliates. One RA reported that private donations were crucial at the beginning of the APA program when participants did not immediately have access to federal benefits. However, RAs noted that while helpful, significant private donations cannot be assumed for every crisis.

### ***Coordination***

In general, the coordination between federal agencies was beneficial in dealing with urgent situations, especially compared to the R&P Program. One RA official described the coordination between PRM, HHS/ORR, and the RAs as the most creative and communicative collaboration she had experienced in her time with the agency. The RAs found the weekly coordination calls of the UCG particularly helpful. Although as noted above, there were instances in which certain federal agencies, such as SSA, did not consistently participate in the UCG, the RAs found it very helpful to have most agencies involved in the APA Program available at a certain time every week. Prior to the UCG calls, RAs would typically raise questions with PRM and then PRM would

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<sup>25</sup> Presidential Determination No. 2021-09 of July 23, 2021, 86 Fed. Reg. 40,915 (July 29, 2021); Presidential Determination No. 2021-11 of August 16, 2021, 86 Fed. Reg. 46,757 (Aug. 20, 2021).

<sup>26</sup> Presidential Determination No. 2022-03 of October 22, 2021, 86 Fed. Reg. 60,749 (Nov. 4, 2021).

<sup>27</sup> Presidential Determination No. 2022-09 of February 1, 2022, 87 Fed. Reg. 6,759 (Feb. 7, 2022).

<sup>28</sup> Payment of the direct assistance per capita (\$1,225) is based on actual arrivals, whereas payment of the administrative per capita (\$1,050) may be made in advance of actual arrivals for actual expenses.

have to forward their questions to the relevant agency, but the weekly call allowed the RAs to go directly to a point of contact who could address their concern.

For example, the issue of unaccompanied minors arose as a pressing issue during the APA Program and RAs were unsure how they should be handled. However, this issue was quickly addressed by PRM and HHS/ORR during UCG calls. As another example, RAs first raised the delays that parolees faced in receiving documentation on the UCG calls. In doing so, the RAs immediately realized the problems were universal, were able to easily identify points of contact at other agencies, and were able to promptly work on solutions. The RAs were hopeful that this collaboration in the UCG will continue, and HUD recently joined the UCG calls to help with housing issues.

## CONCLUSION

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The APA Program was an unprecedented and demanding effort that presented substantial challenges for the nine RAs that implemented the program. Many of these challenges were structural and outside of the control of PRM, such as the volume and pace of arrivals and the shortages in available housing and were exacerbated by the ongoing COVID-19 pandemic. However, the RAs identified several of these issues that could be addressed to strengthen the ongoing R&P Program and prepare for any future situation in which a large number of humanitarian parolees need to be resettled, such as innovation in tracking systems and the more timely issuance of guidance. Nonetheless, the RAs universally praised the funding provided by the APA program and the unparalleled coordination between federal agencies in assisting with resettlement.

## APPENDIX: OBJECTIVES, SCOPE, AND METHODOLOGY

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OIG began this review in October 2021 to examine the challenges faced by the RAs in resettling Afghans under the APA Program and how the Department was able to assist with these challenges.

OIG gathered information from PRM officials as to the APA Program, as well as the differences between the APA Program and the R&P Program. OIG met with each of the resettlement agencies between April 2022 and July 2022. OIG also reviewed relevant documentation, such as the cooperative agreements and the APA quarterly reports. To ensure candor, OIG did not attribute any specific statements to an individual RA, but rather reported on themes consistent throughout its interviews with the nine RAs.

We also coordinated this review with other OIG offices conducting Afghanistan work and participated in a monthly coordination meeting with other Offices of Inspector General conducting related work.

Because the APA Program was a limited term program that ended in 2022 and was created to deal with unique circumstances, this information report provides a summary of lessons learned but no recommendations for corrective action.

OIG provided a draft of this report to PRM, as well as the RAs. PRM provided technical comments that OIG incorporated as appropriate. One RA provided technical comments, which we incorporated.

This review was conducted in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency.

## ABBREVIATIONS

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APA	Afghan Placement and Assistance
CBP	Customs and Border Protection
Department	Department of State
DHS	Department of Homeland Security
DoD	Department of Defense
EAD	Employment Authorization Document
ERMA	Emergency Refugee and Migration Assistance
FEMA	Federal Emergency Management Agency
HHS	Department of Health and Human Services
HHS/ORR	HHS Office of Refugee Resettlement
HUD	Department of Housing and Urban Development
IOM	International Organization for Migration
OAR	Operation Allies Refuge
OAW	Operation Allies Welcome
OIG	Office of Inspector General
PDP	Planned Departure Plan
PRM	Bureau of Population, Refugees, and Migration
R&P	Reception and Placement
RA	Resettlement Agency
RSC	Resettlement Support Center
SIV	Special Immigrant Visa
SSA	Social Security Administration
SSN	Social Security Number
UCG	Unified Coordination Group
USRAP	U.S. Refugee Admissions Program

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