



Office of  
Immigrant Affairs

Nisha Agarwal  
Commissioner

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Cecilia Muñoz, Director  
White House Domestic Policy Council  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

León Rodríguez, Director  
U.S. Citizenship and Immigration Services  
20 Massachusetts Ave, NW  
Washington, DC 20549

Dear Directors Muñoz, Rodríguez and Members of the White House Task Force on New Americans:

The New York City Mayor's Office of Immigrant Affairs (MOIA) applauds President Barack Obama and his administration for creating the White House Task Force on New Americans. We are pleased to offer input on best practices for immigrant integration and suggest ways that our federal colleagues may "ensure they are responsive to the needs of new Americans and the receiving communities in which they reside."

Facilitating the well-being and integration of New York City's immigrant population is MOIA's chartered mandate and a key priority for Mayor de Blasio and the City of New York. Nearly 40 percent of New York City residents – approximately three million people – are foreign born; nearly 60 percent are immigrants or the children of immigrants. Immigrant integration strategies make our city safer, more welcoming, and economically competitive.

New York City's leadership and diversity make the City uniquely qualified to share practices that can be replicated in other jurisdictions, as well as to suggest how federal departments and agencies can better partner with localities to successfully integrate new Americans. In the absence of comprehensive immigration reform, cities like New York City will continue to be hubs of innovation and inclusion when it comes to integration issues. With reform, successful implementation led by cities in partnership with the federal government will become ever more critical.

Below please find examples of what we feel are best practices as tested by the City, as well as recommendations for the Task Force's consideration that are rooted in our experience as an immigrant gateway city. These were developed in consultation with our agency partners, including the Department of Youth and Community Development, the Department of Health and Mental Hygiene, the Mayor's Office to Combat Domestic Violence, the Mayor's Office of Criminal Justice, the New York Police Department, the Department of Consumer Affairs, the New York City Economic Development Corporation, the Human Resources Administration, and Small Business Services.

We welcome the opportunity to discuss these and other practices and recommendations further with the Task Force.

## **New York City's Local Strategies for Immigrant Integration**

New York City's successful strategies to support immigrant integration were developed in response to the primary integration needs of immigrants, which include:

- English language training;
- Basic skills training, including native-language literacy;
- Job readiness and employment assistance;
- Financial empowerment services;
- Business and entrepreneurial support;
- Immigration legal assistance;
- Access and assistance navigating City services and programs, including language access; and
- Education and awareness about individual rights and responsibilities.

These needs are acute. Not only are there approximately three million foreign-born New Yorkers, but 25 percent of New Yorkers over age 5 are limited English proficient, and immigrants have lower income levels and higher poverty rates despite similar or higher participation rates in the labor force. At the same time, immigrants are the backbone of New York City's economy. Immigrants represent 44 percent of the City's workforce, nearly half of New York City's businesses are immigrant-owned, and immigrants are more than twice as likely as their native-born counterparts to start a business.

### ***a. Office of Immigrant Affairs***

New York City's Mayor's Office of Immigrant Affairs is the first office of its kind in the country and the only charter-mandated such office. MOIA serves as a key bridge between immigrant communities and City government. Charged with promoting policies and programs that facilitate immigrant well-being, MOIA engages in community outreach while at the same time functioning as a partner to City Hall and MOIA's sister agencies on immigrants' integration needs. In Mayor de Blasio's administration, we are charged with major initiatives – a municipal identification card program, local and national work on the President's executive action – that helps situate immigrant integration squarely within the key priorities of the administration. Several other cities across the country have similar, dedicated offices that support the well-being and integration of immigrants, including Atlanta, Boston, Baltimore, Chicago, Philadelphia, Houston, Los Angeles, Nashville, San Francisco, and Seattle. In order to institutionalize the gains made by these and other cities—and encourage more human and financial resources to be dedicated to this issue—the White House Task Force could encourage the creation of more such offices in city charters or via mayoral executive orders that give the offices clear and broad authority and resources, especially in new immigrant gateway cities. Interested municipalities can borrow relevant best practices from successful, longstanding models. The Task Force could also provide financial support and human resources to assist in the creation of new offices as well as continued growth and development of preexisting ones.

### ***b. Language Access***

New York City has been a leader in ensuring that limited English proficiency is not a barrier for City residents. Local Law 73 strengthens language access services for limited English proficient New Yorkers seeking vital health and human services. Executive Order 120 creates a centralized, city-wide language access policy that mandates that all public-facing City agencies create a language access implementation plan that will ensure meaningful language access to their services, designate a language access coordinator, and provide services in languages based on at least the top six languages.

New York City's local laws and implementation strategies can serve as models for our local, state, and federal partners. Under the de Blasio administration, agency language access coordinators are senior-level officials who lead teams within their agencies to facilitate language access. The City maintains a volunteer language bank of certified interpreters and translators and is in the midst of recruiting community volunteers for the language bank. Major outreach campaigns are multilingual, and the administration is reviewing its community and ethnic media investments to ensure that the City is reaching immigrant communities in their language. In addition, agencies such as the NYC Human Resources Administration have a centralized unit that manages contracts with language service vendors, provides trainings for staff, works across the agency to ensure that policies, procedures, and new initiatives are rolled out in a way that complies with relevant laws; and tracks relevant data to monitor compliance. Entities such as the Mayor's Office to Combat Domestic Violence conduct cultural competency trainings for all front-line staff to further facilitate access by diverse immigrants. The Department of Youth and Community Development also includes linguistically appropriate and cultural competence requirements in its requests for proposals and evaluates service providers who receive funding from the agency on language access and cultural competence.

***c. Municipal Identification Card Program***

In January 2015, New York City launched the country's largest municipal identification card program, to resounding demand among the community, particularly among immigrants. Given that roughly half of adult New Yorkers do not have a state driver's license, the initiative was developed to respond to a widespread need for government-issued ID among city residents. Learning from successful models in San Francisco, Oakland and New Haven, the New York municipal identification card – which is available to all New Yorkers, regardless of immigration status—facilitates immigrant integration in myriad ways. As a form of identification recognized by the New York Police Department, the program facilitates public safety and builds community trust. It also provides access to City services, including such fundamental access as entry to schools for parents, entry into City buildings, public library privileges, and access to mainstream financial services through participating banks and credit unions. New York City has already consulted with several cities and counties interested in developing their own municipal identification programs. The Task Force could provide further support and encouragement to interested localities, and encourage recognition of such cards by federal agencies and regulatory bodies and by private businesses.

***d. Support for Immigrant Business Owners and Jobseekers***

New York City recognizes the important role that immigrants play in the City's economy and the contributions immigrants provide to economic growth and opportunity, and agencies such as the New York City Economic Development Corporation (EDC) and Small Business Services (SBS) have developed innovative programs and practices to support immigrant job-seekers and business owners. EDC serves high-skilled immigrants through Immigrant Bridge, a pioneering program that assists internationally trained immigrants who are un-employed or under-employed transition into higher paying jobs in their areas of expertise. It also serves entrepreneurial immigrants through Competition THRIVE, a program designed to support community-based organizations in addressing obstacles faced by immigrant business owners. SBS has developed targeted strategies to help immigrants overcome barriers to running a business or seeking employment through the Immigrant Business Initiative and the Craft Entrepreneurship program. SBS has also expanded existing programming into new languages, creating an immigrant resource toolkit, furthering the cultural and linguistic capacity of front-line staff at its Business Solutions Centers and Workforce1 Centers, and institutionalizing agency-wide data standards and procedures for capturing demographic information to better understand immigrant needs and to inform provision of services.

***e. Support for Immigration Legal Services***

New York City has a strong interest in supporting immigrants on the path to citizenship, given that accessing lawful immigration status and/or citizenship yields substantial benefits in terms of family unity, increased earning power and financial empowerment, and increased civic and economic contributions. Models abound throughout City government. MOIA provides information and outreach on citizenship to immigrants throughout the city, has assisted thousands of New York City residents apply for citizenship, and is working with the cities of Chicago and Los Angeles to lead an effort to share models for citizenship promotion by cities throughout the nation. The Mayor’s Office to Combat Domestic Violence connects immigrant domestic violence survivors with immigration legal consultation and representation. The Mayor’s Office of Criminal Justice funds, via a partnership with the state, immigration attorneys to provide legal assistance and *Padilla* support to attorneys representing non-citizen defendants in criminal proceedings and appeals regarding the potential immigration consequences of criminal convictions. The Department of Youth and Community Development has developed a DACA Network that connects organizations providing outreach, literacy, and legal services within an interdependent structure, and also funds English and civics instruction and general literacy. And the Human Resources Administration administers the Immigrant Opportunities Initiative, which funds civil immigration legal services, and the New York Immigrant Family Unity Program, which funds the nation’s first universal, public defender program for immigrants in federal immigration detention.

***f. Partnership with Community-Based Organizations and Libraries***

In order to maximize the impact of immigrant integration efforts, agencies across the City government leverage their partnerships with immigrant-serving community-based organizations, faith leaders, other civic leaders, and the New York, Queens and Brooklyn Public Library systems. These are the partners that are often the most trusted by immigrants as sources of information and help, and are best positioned to help the City identify community needs and concerns. Thus, community-based organizations and New York’s three public library systems have been key partners in the design and implementation of various City programs targeting immigrants, including the rollout of the City’s municipal identification card program, among other services and benefits. In one example, the Department of Health and Mental Hygiene (DOHMH) has recognized that when public health issues arise—as was the case with Ebola in New York City last year—individuals are more likely to adhere to messages delivered by people who are part of their community and have developed their outreach and engagement plans accordingly. DOHMH created the Center for Health Equity, an office tasked with creating partnerships with communities in order to better deliver critical public health services and messages.

**How the Federal Government Can Better Support Immigrant Integration**

We recommend dedicated federal funding to support successful integration programs and initiatives across all the areas of need specified above: English, civics, literacy, other skills training; job readiness training; small business support; language access strategies, including translation services and interpreter training and certification; cultural competence training; access to health care services and benefits; immigration legal services, including immigration advice for criminal defense attorneys; financial literacy and empowerment services; and funding to support grants to community-based organizations that are key partners in immigrant integration and engagement.

Federal funding in support of local and state efforts to aggregate and maintain centralized information, in multiple languages, about benefits and resources would also help ensure that immigrants are able to access and navigate the array of services that are available to them.

In addition, on behalf of our agency partners, we recommend the following federal strategies to the Task Force:

- Creation of more user-friendly interfaces for public-facing federal agencies;
- Better access to interpretation and translation services for community members interacting with federal agencies;
- Translation of federal agency materials and forms into a wider variety of languages, including tax materials and forms and USCIS materials and forms;
- Creation of public education campaigns on topics relevant to immigrant communities in diverse languages, targeting immigrant communities via local points of community contact, in collaboration with local and state partners;
- Updated guidance on immigration and public charge issues for social service agencies such as the Human Resources Administration;
- Clarification on public benefits eligibility for immigrants for social service agencies such as the Human Resources Administration;
- Additional outreach on immigration service provider fraud and increased support and coordination for referrals to free/low-cost services;
- Designation of domestic violence organizations, such as the Mayor’s Office to Combat Domestic Violence, to certify U/T visa applications;
- Increased funding for refugee and immigrant resettlement services that incorporates workforce development services as well as access to entrepreneurship and small business services;
- Streamlining of visa processes for foreign entrepreneurs who wish to create new businesses and opportunities in the U.S.

Last, but certainly not least, we urge the Task Force to convene cities such as New York with significant immigrant populations for quarterly meetings to further discuss the Task Force’s priorities and these recommendations with respect to the linguistic, economic, and civic integration of immigrants.

We again thank the Task Force for this opportunity and look forward to further engagement.

Sincerely,



Nisha Agarwal

Commissioner