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Memo

To

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Leon Rodriguez
White House Task Force
on New Americans

From

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Re

New American Integration
Needs, Opportunities &
Actions
Recommendations

It is with great pleasure that we submit the attached summary of immigrant integration issues and recommendations to the White House Task Force on New Americans. This is a historic opportunity for the City of Seattle to inform President Obama's new American integration plan. The recommendations are provided on behalf of the Mayor's Office and the Office of Immigrant and Refugee Affairs, an executive-level office within the Mayor's Cabinet.

While the attached summary captures most of the core issues that we are working on across the City to make Seattle a leading city on immigrant integration, we would like to highlight a few priorities that we consider to be the three rails of immigrant integration:

- Providing ESL programs to help unemployed and underemployed immigrants get jobs and gain economic self-sufficiency
- Increasing citizenship rates
- Improving language access policies and protocols

Based on unanimous feedback from key stakeholders (The Gates Foundation, immigrant and refugee organizations, community colleges, and workforce development organizations), we recognize the need for programs that support low English proficient adult ESL students (CASAS Levels 1-3) who want and need ESL to get a job, find a better job or start their own business. The life skills focus at community organizations and academic focus of community colleges do not meet the needs of this population and, as a result, they drop out of ESL, making it difficult to break the persistence of unemployment and underemployment.

Our new and innovative *Ready to Work* program will bring together community-based development organizations, community-based service organizations and community colleges to deliver jobs-focused ESL instruction supported by wrap-around services (housing, childcare, transportation, mental health), job training, and digital literacy. We will also identify technology partners to help us design the digital literacy components of the program and employers to create employment pathways.

As the eighth largest refugee receiving state in the country and the 10th largest state impacted by the President's DACA/DAP program, citizenship and civic engagement is another pillar of our immigrant integration work. With USCIS, we will implement Citizenship Corners this year and evaluate our current New Citizens Program to achieve our goal of increasing citizenship rates among eligible LPRs. We want to create an ethos of citizenship throughout the City by leveraging all city assets – public libraries, Seattle Channel TV programming, community centers, parks – and partnering with business and community organizations – faith, labor, ethnic media and more. Immigrants and refugees

will hear about citizenship where they worship, eat, shop, live and work. Because naturalized citizens earn 11 percent more than their non-naturalized counterparts, we hope that citizenship is also one of the pillars for the White House Office on New Americans and supported with significant resources.

Besides a job and citizenship, English proficiency is the third rail of immigrant integration. Being able to participate in the linguistic life of our country and advocating for yourself – at work and in healthcare settings in particular – were some of the top reasons that adult ESL students said were important to learn English, according to focus groups of adult ESL students we conducted in December 2014. What's more, research shows that unemployment rates are lower and job mobility is higher among English fluent immigrants and refugees. While our Ready to Work program will provide ESL programs to address the importance of linguistic integration to get a job, we also recognize that the City needs to do a much better job of serving our LEP residents. Through our Language Access program, we will implement a five-year plan to help the City be able to serve all of our residents, regardless of the language that they speak, and provide high-quality interpretation, translation and community engagement services. With 129 languages spoken in our public schools and one-third of our immigrant and refugee households being linguistically isolated, a rate that exceeds larger cities like San Francisco and New York City, our ability to succeed in our Language Access work will be bolstered by support by the White House Office on New Americans.

Seattle is proud to partner with our peer offices in New York, San Francisco, Los Angeles and more. We strongly recommend quarterly calls for the mayor's offices to interact with the Taskforce around priority issues and actions that can be taken to promote these three rails of immigrant integration. The quarterly calls would not only be a good opportunity to share success stories and best practices for these vital services, but also to strategically "connect the dots" across the range of policies and programs between local, state and federal efforts.

Thank you for your incredible leadership to get us to where we are today – better than where we were yesterday and filled with hope for continued positive change in the midst of incredibly challenging circumstances. We stand ready to work with you and take the next steps to make the President's integration plan a reality across the country.

NEW AMERICAN INTEGRATION NEEDS, OPPORTUNITIES + ACTIONS TABLE

Input Form for the Federal Plan to Improve Integration of New Americans

Completed by:

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<p><i>Top integration needs of immigrants, refugees, and their young children (ages 0-8) served by the City of Seattle OIRA</i></p>	<p><i>Federal policies or approaches that constrain or could better support positive integration outcomes</i></p>	<p><i>Recommended Federal government actions to improve integration and/or support City efforts to do so</i></p>
<p>Education:</p> <ol style="list-style-type: none"> 1. Early Childhood Education – Seattle is just launching its pre-school program in its first year, with limited eligibility due to its size and scale. Many immigrants and refugees will want to partake in an expanded program. There are a number of immigrant and refugee childcare providers who do not have the level of education necessary to participate in this new program. 2. General K-12 – Many immigrant and refugee families do not understand all of the rules in the K-12 system – i.e. around attendance policies or suspension. Also, many parents of young children face barriers of cultural systems and child development knowledge, as well as literacy and basic English skills, which 	<p>Education:</p> <ol style="list-style-type: none"> 1. The specific needs of low literate and LEP parents of young children cannot be met by existing federal early childhood or adult education schemes. 2. Federal policy holds states and districts accountable for the academic performance and graduation rates of students who are English Language Learners, but little support is available to meet the more intensive needs of these students. In addition, there is insufficient federal funding for the wide range of nonacademic needs presented – such as mental health, physical health, nutrition, etc. 3. Many factors limit success of adult education learners, including insufficient support for basic as well as integrated education and training 	<p>Education:</p> <ol style="list-style-type: none"> 1. Creation of federal pilot program, jointly administered by HHS ACF and Ed’s OCTAE, to test large-scale approaches to meeting the needs of low-literate and LEP immigrant and refugee parents of young children. 2. White House and Departments of Education and HHS should engage with local mayors and school district leaders to create goals and benchmarks for effective integration of immigrant and refugee students. They should also build consensus on approaches to ensure that districts have sufficient funding to provide support for late arriving immigrants and refugees. 3. Innovation funds could be created to assist cities and states using evidence-based plans to more effectively assist

<p>limit their ability to access services for their young children and ensure their readiness for kindergarten and further education success.</p> <ol style="list-style-type: none"> 3. Adult Education – Many adult refugees lack continuance in their education or have never been formally educated. They therefore may face challenges in filling gaps in their underlying education and developing sufficient academic literacy in English to meet high school graduation standards. They may require extra time, as well as a range of instructional and other support services to assist them in successfully graduating from high school or transitioning to post-secondary education. 4. ESL for Work – According to focus groups we conducted in December 2014 with adult ESL students, many said that they want ESL for the workplace, not ESL in academic settings that are geared towards a GED or college degree. These adults are usually in the very early stages of ESL (CASAS Levels 1-3), and most job skills programs are limited to more advanced levels of ESL (Levels 4-6), leaving the least English proficient with few options and, as a result, greater challenges in attaining job mobility and economic self-sufficiency. 5. Brain Waste – Many highly educated immigrants come to the U.S. without a 	<p>programs. If new federal accountability requirements support HSE completion or post-secondary transition, disparity will increase with lower educated immigrant and refugee adults.</p> <ol style="list-style-type: none"> 4. The jobs readiness and digital literacy needs of the least proficient adult ELLs are not met by federal policies. Education dollars to community colleges do not require retention data. 5. Because of the U.S.’s decentralized federal system, no single structure governs professional certification in regulated occupations. 	<p>adult learners in education and skill outcomes.</p> <ol style="list-style-type: none"> 4. Support innovative programming at the local level like Seattle’s Ready to Work Model, which will launch this year. This model pairs job skills and digital literacy with ESL 1-3 in a partnership between community colleges and CBOs. In addition, fund an assessment of ESL programs – Levels 1-3, particularly in the most underserved communities and professions. Evaluate existing or new federal and state money that can be used to incentivize community partnerships (community colleges, CBOs) and new curricula to address the unmet needs for Level 1-3 adult ELLs. 5. Investigate the creation of a federal body that would govern professional certification in regulated occupations. Do an assessment of the occupations that are not addressed, and support innovative and widespread programming for foreign professionals. Support the President’s initiative to states to analyze the costs and benefits of their licensing rules, identify best practices and explore making licenses portable across state lines.
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job lined up. Few programs exist to recognize foreign qualifications, which creates “brain waste” and adds to the high rates of underemployment and unemployment among immigrant workers. Current occupational licensing criteria are an impediment and vary across jurisdictions.

Law enforcement:

1. Identification – The Real ID will increase fear and distrust in immigrant and refugee communities.
2. Many immigrants are the victims of fraud and wage theft but do not report the crimes because of fear of employer retaliation and mistrust of police. Undocumented immigrants are the most vulnerable to these crimes and the most hesitant to report crimes.
3. Police bodies do not necessarily talk to each other – some jurisdictions have accepted policies to not ask for status, and some have not. When different police are in one single jurisdiction, it is confusing for immigrants.
4. Diversity – Seattle is under a DOJ consent decree after investigations found evidence of police misconduct. In a Safe Communities initiative in 2012 when OIRA conducted 30 kitchen table conversations in immigrant/refugee communities, fear and mistrust of was cited as the top issue. Seattle’s police force is heavily

Law enforcement:

1. Real ID Act of 2005.
2. DOL and DOJ are working collaboratively to host six listening sessions across the country to hear and to be responsive to Asian American workers’ labor concerns.
3. The transition from Secure Communities to the new “Priority Enforcement Program” requires training and monitoring of relevant local and national law enforcement actors.
4. No federal laws or programs exist to address the significant diversity gaps that exist in law enforcement.

Law enforcement:

1. The White House Office of Intergovernmental Affairs should create a regular mechanism by which local mayors and police chiefs can communicate with the White House and ICE regarding challenges in implementation of new policies. There should also be a centralized strategy on collecting data for disparate impacts and financial implications for various policies and laws being passed through law enforcement. The Department of Justice should provide technical assistance and guidance to help law enforcement agencies compare demographic data with data on departments’ use of language lines, bilingual staff, and interpretation and translation services to regularly assess their own compliance with agency language access plans as well as relevant federal and state language access laws.
2. Support innovative public safety programming like Seattle’s Refugee Women’s Institute, which brings officers and refugees together to discuss public

<p>native-born and white.</p>		<p>safety challenges in their communities and develop local refugee leaders. The Department of Justice should create grants for law enforcement agencies to provide training in languages commonly spoken by local LEP residents. The Office of Community Oriented Policing Services (COPS) should collect and make available existing curricula and resources used by law enforcement agencies that have already created such language training initiatives.</p> <p>3. The White House Office of Intergovernmental Affairs should create a regular mechanism by which local mayors and police chiefs can communicate with the White House and ICE regarding challenges in implementation of new policies. This would allow local law enforcement to speak across jurisdictional lines. Leadership should be demonstrated in outlining expectations around implementation of new immigration enforcement priorities.</p> <p>4. The Department of Justice should provide technical assistance and grants for local law enforcement agencies to develop outreach and marketing campaigns to recruit new officers from immigrant communities. Such efforts should be carried out in partnership with community based organizations and ethnic media outlets that have regular contact with immigrants, refugees and LEP individuals.</p>
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<p><u>Citizenship</u></p> <ol style="list-style-type: none"> 1. Citizenship Application Costs have risen dramatically and has become a barrier for the working poor and low-income seniors. <p><u>Language access</u></p> <ol style="list-style-type: none"> 1. Cities have inconsistent language access standards, leading to confusion for immigrants and refugees as to their linguistic rights. Few cities have strong language access policies that truly make government services and information available to meet the needs of LEPs. In Seattle, 189 languages are spoken in our public schools and more than one-third of immigrant refugee households in the City are linguistically isolated (no English is spoken), a rate higher than larger cities like San Francisco and New York. <p><u>Jobs and Business:</u></p> <ol style="list-style-type: none"> 1. Immigrant and refugee communities start businesses at twice the rate of their native-born counterparts, but they also fail at a higher rate. Immigrants start 28% of all new US 	<p><u>Citizenship</u></p> <ol style="list-style-type: none"> 1. USCIS sets a blanket cost for citizenship fees. <p><u>Language access</u></p> <ol style="list-style-type: none"> 1. Title VI’s Prohibition on National Origin Discrimination and Department of Health and Human Services regulations, 45 C.F.R. Section 80.3 (B) (2), require recipients of Federal financial assistance from HHS to take reasonable steps to provide meaningful access to Limited English Proficient (LEP) persons. <p><u>Jobs and Business:</u></p> <ol style="list-style-type: none"> 1. ETA recently awarded grants to enable six states to expand partnerships with community organizations to help foreign-trained 	<p><u>Citizenship</u></p> <ol style="list-style-type: none"> 1. The administration should consider a fee waiver or a partial fee reduction for low-income applicants and seniors. In addition, the creation of an “Integration Success Fund”, which would provide resources for grants on a competitive basis to improve the economic, linguistic and civic integration of immigrants and their children, would be helpful to leverage assistance in these endeavors. <p><u>Language access</u></p> <ol style="list-style-type: none"> 1. Quarterly calls for the mayor’s offices to interact with the Taskforce around priority issues and actions that can be taken to promote linguistic, economic and civic integration of immigrants and refugees in each city. This would be a good opportunity to share success stories and best practices for this vital service. <p><u>Jobs and Business:</u></p> <ol style="list-style-type: none"> 1. DOL has been expanding employer partnerships through work-based learning approaches, such as Registered Apprenticeship and On-
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<p>businesses. Newcomers and new business owners may lack knowledge of local business regulations and access to credit and banking services that could help ensure the success of their business enterprises. Many immigrants and refugees lack the appropriate credentialing for the training they have had in their home countries.</p> <p>2. There is a lack of family-wage jobs for immigrant and refugee job seekers – particularly for those who speak little English or with limited status.</p>	<p>immigrants and others acquire the necessary certifications, licenses, and English language skills to pursue their professions in the U.S. DOL has also been working collaboratively with agencies to support partnerships to increase entrepreneurship.</p> <p>2. Current federal policies do not adequately address the need to increase family wage jobs for immigrant and refugee job seekers. The federal minimum wage is not currently sufficient to raise a family of four.</p>	<p>the-Job Training (OJT). Programs allow English Learners to acquire skills and training that can lead to more career opportunities. This program should be expanded and promoted in every city. Work groups should be created to identify incentives through this program. A similar recommendation would go to the ORR’s Microenterprise Development Program – which helps refugees develop, expand or maintain their own businesses and the Home-Based Child Care Program. Finally, the listening sessions should be expanded across ethnic backgrounds, targeting refugee populations and people who are new to the country. Priority should be given to industries that predominantly employ immigrants and refugees such as</p> <p>2. <u>Short-term</u>: A specialized taskforce should be created to target strategies across service areas to better support immigrant families into family wage jobs. Nearly 40% of immigrant workers in low-wage jobs are undocumented and undocumented workers have difficulty obtaining justice in cases of mistreatment and wage theft. Regulations exist, but the lack of formal documentation disempowers the victims. The taskforce should strategize to support these families to have equal access to employment opportunities.</p> <p><u>Long-term</u>: Raise the federal minimum</p>
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<p><u>Housing:</u></p> <ol style="list-style-type: none"> 1. Undocumented immigrants are unable to obtain subsidized housing built with federal dollars. 2. Seattle has a shortage of housing for low-income refugees with large families. Many of the refugees in Seattle come with large families – often 5 to 7 children. Subsidized housing in the United States is often built to support 2-4 children. In most situations, this leads to an overcrowding of persons-per-room in a dwelling unit. There is additional research that shows Hispanic families are likely to live in overcrowded units as well. This leads to emotional and physical instability in the families, higher rates of drop outs for youth, and increased participation in youth violence. <p><u>Utilities:</u></p> <ol style="list-style-type: none"> 1. Utility Bills - Seattle has a utility assistance program that supports low-income immigrants and refugees in paying for all or part their utility bills. Those who live in §8 housing are ineligible for this program because they are considered to be “double dipping.” Many immigrants and refugees are incapable of paying for both housing and utilities and have 	<p><u>Housing:</u></p> <ol style="list-style-type: none"> 1. Section 214 of the Housing and Community Development Act of 1980 states that only certain categories of noncitizens are eligible for benefits under the housing programs covered by Section 214. Unauthorized aliens are not eligible for benefits under Section 214. In addition – in order to be eligible for Section 8 tenant-based vouchers (via the Housing Choice Voucher Program), at least one member of your family/household must be a US Citizen or eligible noncitizen. Section 8 of the Housing Act of 1937 authorizes the payment of rental housing assistance to private landlords. The Housing Choice Voucher Program provides tenant-based rental assistance. 2. The specific needs of large refugee and immigrant families cannot be met by existing HUD regulations. <p><u>Utilities:</u></p> <ol style="list-style-type: none"> 1. Section 8 of the Housing Act of 1937 authorizes the payment of rental housing assistance to private landlords. The Housing Choice Voucher Program provides tenant-based rental assistance. 	<p>wage.</p> <p><u>Housing:</u></p> <ol style="list-style-type: none"> 1. Develop an interagency team with HUD to analyze the disproportionate impacts of these federal policies on the undocumented population. Particular emphasis should be placed on the new DACA/DAP families and analysis should be done to identify opportunities to support low income ineligible noncitizens into housing. 2. Create a pilot program encouraging building larger housing units, to support successful transition of large refugee/immigrant families. The impacts of these housing units should track the family’s general social and emotional well-being, as well as likelihood of youth participation in violence, high school dropout rates, and child <p><u>Utilities:</u></p> <ol style="list-style-type: none"> 1. Rental Housing regulations should be reviewed with housing partners to identify gaps in coverage so that owners can adjust rent appropriately to support an immigrant or refugee with their utility bills. Financial planning support services should be provided.
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exorbitantly high utility bills – often ranging from \$500-\$1,000.

Human Services:

1. There is little consistency across shelters for access to interpretation and translation. Many shelters are woefully underfunded and can provide just the minimum in language access. Investment in language access would allow more immigrants and refugees to successfully transition out of shelters and into stable housing.
2. Childcare assistance – many immigrants and refugees need assistance in supporting their families while they are working. Seattle provides a childcare assistance subsidy for low income residents, which could be expanded so that everyone eligible could receive the assistance.

Health care and environment:

Human Services:

1. Language care in human services are typically governed by federal requirements through Title VI (noted below under “Language Access.”)
2. The federal Child Care and Development Fund (CCDF) helps low- and moderate-income families with the cost of child care and increases the availability and quality of that care. States contribute matching resources for a portion of the CCDF funding they receive. But currently, federal and state funding for child care assistance falls well short of the need, and only a small share of young children receive federally-funded child care subsidies.

Human Services:

1. Lack of federal leadership in the language access arena leaves agencies unclear on protocols, best practices, or effective modalities for these services. HHS should be proactive and provide leadership on this issue.
2. With the Obama Administration’s expansion of this program, an additional 1 million additional young children will be supported and states are required to develop plans to build care for infants and toddlers. MOIAs and State governments should participate in quarterly calls to ensure that immigrant and refugee childcare providers are supported in transitioning through this process and receiving the credentialing they need to maintain the standards required by the State. In addition, the calls should discuss how to ensure immigrants and refugees will be supported in accessing this support. Finally, \$100 million in new competitive grants that will be released to develop models of childcare. These grants should include review by representatives from MOIAs across the country.

Health care and environment:

<ol style="list-style-type: none"> 1. Environmental issues impact immigrant and refugee communities disproportionately. 2. Immigrants are also far more likely than native-born individuals to lack health insurance. It is difficult for them to access affordable high quality health care services due to rules that bar many immigrants from Federally-funded healthcare programs, and a frequent lack of linguistic and cultural competency among providers. 3. Mourning rituals differ across jurisdictions, but many medical examiners are unaware of these customs. 	<p><u>Health care and environment:</u></p> <ol style="list-style-type: none"> 1. Executive Order 12898 provides direction for EPA’s environmental justice activities, environmental justice is already imbedded in EPA’s own mission statement and the language of existing environmental laws and their implementing regulations. 2. In many cases, immigrants are explicitly barred from accessing affordable health care due to Federal laws and policies. Neither undocumented immigrants nor DACA are eligible for coverage under ACA and lawfully present immigrants are subject to a five-year waiting period before they are eligible to access Medicaid benefits. Federal Safety nets like Disproportionate Share and Community Health Clinic funding have been reduced. 3. The specific needs of immigrants and refugees in mourning cannot be met with current federal policies. 	<ol style="list-style-type: none"> 1. Require use of racial impact tools or the EPA’s environmental justice toolkit on every policy with financial implications. 2. Reinvest in federal safety nets for ineligible residents trying to apply for federal health benefits. Support advocacy to lessen restrictions on the ineligible population to access. 3. Medical Examiners are required to be a medical doctor with a certification in forensic pathology from the American Board of Pathology. Working with the Board to create cultural competency trainings, particularly focusing on new and incoming refugee populations with various religious beliefs. Also assessing current regulations and identifying a work group to address some of the possible areas for change to support the mourning rituals of these new populations.
<p><u>Equitable development</u></p> <ol style="list-style-type: none"> 1. Significant increases in cost of living and shortage of affordable housing is gentrifying neighborhoods and pushing out the City’s immigrant and refugee families to neighboring cities and towns. 2. Transit- As more immigrant and refugee families are pushed out of cities, the strains on public transportation infrastructure to the cities has become overwhelming. The 	<p><u>Equitable development</u></p> <ol style="list-style-type: none"> 1. Federal policies do not currently address the needs of families being gentrified out of their homes in localities. 2. Financing the construction, operation and maintenance of public transportation systems involves many different types of funding sources, including Federal and non-Federal grants, cooperative agreements, 	<p><u>Equitable development</u></p> <ol style="list-style-type: none"> 1. Federal investment in HUD and low income housing programs should increase, cutbacks have placed upward pressure on the affordability of existing private unions. An interagency team and inter-jurisdictional team should align to examine land development and exclusionary zoning practices that make it difficult to produce housing that low-income housing people can

<p>lack of transit alternatives and the possibility of an integrated life have greatly disparate outcomes, particularly for low-income immigrant and refugees.</p> <p><u>Contracting</u></p> <ol style="list-style-type: none"> 1. Bids for large contracting projects through the EPA and Department of Transportation require either legal permanent resident status or citizenship. <p><u>Refugees</u></p> <ol style="list-style-type: none"> 1. Many refugees in particular suffer a range of hardships before resettlement that has pronounced gaps in underlying education and skills that make it difficult for them to find jobs in which they can earn a family sustaining wage or be on path to economic advancement. <p><u>Money Transfers</u></p>	<p>loans, and revenue sources.</p> <p><u>Contracting</u></p> <ol style="list-style-type: none"> 1. EPA and DOT guidance for utilization of Small, Minority and Women’s Business Enterprises in Procurement Agreements. <p><u>Refugees</u></p> <ol style="list-style-type: none"> 1. Little information that could help to ensure more effective integration of refugees is provided to city governments in advance of their arrival. Existing services are often insufficient to meet needs. <p><u>Money Transfers</u></p>	<p>afford. Particular emphasis should be placed on urban renewal programs in local jurisdictions.</p> <ol style="list-style-type: none"> 2. Facilitate interagency conversations between DOT and HUD to collaborate on recommendations to support integrated housing and transit options for immigrant and refugee families being pushed out of cities. <p><u>Contracting</u></p> <ol style="list-style-type: none"> 1. An interagency team should be brought together to identify the disproportionate impact to immigrant and refugee businesses, and to identify mitigating opportunities to support these businesses that are excluded from the bidding process. <p><u>Refugees</u></p> <ol style="list-style-type: none"> 1. Classification system should be implemented to assess levels of education, native and English language and literacy skills, and work experience. Federal government should also provide reimbursement or direct funding for integrated adult basic education, workforce training and career navigation and pathway supports required to assist refugees in obtaining basic skills and training sufficient to earn a family-sustaining wage. <p><u>Money Transfers</u></p>
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<p>1. Many immigrant and refugee families send money to their home countries to support their families. For example, 60% of Somalia's population gets money from outside the country through money transfers. With the tightening of federal regulations like antiterrorism financing laws, many banks are refusing to transfer money to Somalia from Washington State.</p>	<p>1. Complex anti-terrorism federal laws have left US banks to refuse to work with Somali money transfer operators to avoid the risk of fines from improper transfers.</p>	<p>1. The Treasury, Federal Reserve, and State Department should reevaluate the regulations and identify opportunities for families to send money to their families with sufficient clarity to reassure banks.</p>
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