

LEAVING TOO MUCH
TO CHANCE:
A Roundtable on Immigrant
Integration Policy

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TABLE OF CONTENTS

Overview	1
Immigrant Education: Pre-K through 12th Grade	3
Work and Work Supports	11
Civic Integration: Naturalization and the Redesign of the Citizenship Test	16
Integration Policies on the Ground: Lessons from the Building the New American Community Project	19
Integration Policy: Looking to the Future	23
Appendix A: Agenda	28
Appendix B: Participants List	30
Appendix C: Additional Resources	34

IMMIGRANT INTEGRATION ROUNDTABLE: OVERVIEW

On March 25, 2005 the Migration Policy Institute (MPI) convened 50 senior experts drawn from the policy research, advocacy, government, and philanthropic communities to explore the current policy agenda on immigrant integration. The meeting was held as the President and Congress began new terms, and debate over comprehensive immigration reform was getting underway. Although major changes in *immigration* policy were the subject of substantial discussion in the media and political arena, as usual, the integration of the United States' many newcomers received far less consideration.

Policy flux. Beyond the new Presidential and Congressional terms, other developments set the context for the meeting. Of prime importance, a set of major national policies that bear on immigrant integration were — and still are — in flux. The federal government's principal welfare law (i.e., the Temporary Assistance for Needy Families program) and job training and adult basic education legislation (Titles I and II of the Workforce Investment Act) are under review by congressional committees. Further, some states continue to reexamine and challenge key provisions of the 2002 No Child Left Behind Act (NCLB) — a law that promises to have particularly far-reaching impacts on immigrant children and the children of immigrants. At the same time, the nation's citizenship policies — specifically the design of the naturalization test — are also being fundamentally rethought and contested, and are poised for potentially broad changes.

In addition to legislative change, new Administration budget proposals for Fiscal Year (FY) 2006, if accepted by Congress, would force deep cuts in some of the new federal programs that target immigrant integration. Spending would be halved, for example, for English as a Second Language (ESL) training offered under the Adult Basic Education program.

The Roundtable’s Topic Areas. The meeting’s participants focused on the opportunities and risks to immigrant integration presented by changes in three broad policy domains: *Pre K-12 education; work and work supports; and civic integration, including naturalization and the redesign of the citizenship test.* A central purpose of the meeting was to approach these three areas — areas that are typically taken up independently — through the unifying lens of immigrant integration, bringing together key thinkers and leaders within each field, many for the first time.

Goals and Underlying Questions. The session had three goals:

1. To develop a shared understanding of recent and pending policy developments and proposals;
2. To assess the opportunities and risks they present; and
3. To *begin* to frame a policy and research agenda for an affirmative and more comprehensive immigrant integration program.

While these broad questions set the general agenda of the meeting, other issues arose:

- What implications do current budget constraints have for developing an integration agenda?
- What high-yield investments might attract a political consensus?
- What institutional adjustments will reform require?
- What governmental and nongovernmental institutions need to be involved? Strengthened? Linked?
- Are there alternatives to publicly financed services and benefits? When are they realistic? Fair?

Meaning of Immigrant Integration. There are many definitions of immigrant integration. For the purposes of this report, we will view

immigrant integration through the lens of policies intended to promote social mobility and inclusion. In that view, the process engages both the immigrant and the receiving community, and involves an ongoing renegotiation of social, economic, and political relations and power.

A Caveat. This report is intended to place the March 25 meeting in context, to capture some of the main points, and to set out some of its implications for future work. It is not intended to be an exhaustive discussion of the policies and issues addressed or a detailed account of the meeting.

IMMIGRANT EDUCATION (PRE-K THROUGH 12TH GRADE)

The Policy Context: The No Child Left Behind Act

Schools have served as critical engines of integration, enabling children to master the core curriculum and both parents and children to acquire language and civics skills. Since 2002 the nation's schools have operated within an altered policy framework established by the controversial No Child Left Behind Act (NCLB), which is due to be reauthorized in 2007. The law has had particularly far-reaching implications for immigrant and limited English proficient (LEP) students. Specifically, it:

- Requires that English language learner (ELL) students, with few exceptions, be included in state academic assessments just like their English-speaking counterparts;
- Compels schools to disaggregate and report ELL student scores on standardized tests;
- Imposes tough sanctions on schools if ELL students do not make progress;

Fast Facts:**High, Steady Flows**

- One in five children in the United States is the child of an immigrant.
- More than one in four low-income children in the United States is the child of an immigrant.
- Half of all children in New York City and in California are the children of immigrants.

Most Children of Immigrants Are Citizens

- Seventy-five percent of children of immigrants are born in the United States and are US citizens.
- Of the 4.6 million children who have unauthorized parents, three million, or 66 percent, are citizens.

The Size and Character of the English Language Learner (ELL) Population

- Roughly 8 percent of all children enrolled in K-12 are English language learners (ELLs); 25 percent of California students are ELLs.
- The number of ELL students in K-12 has roughly doubled since 1994/95.
- Seventy-five percent of ELL students speak Spanish; no other language group accounts for more than 3 percent of all ELL students.
- Half of ELL students attend schools where 30 percent or more of their fellow students are also ELLs — a share that rose between 1995 and 2000.
- Over half of both ELL elementary and secondary students were born in the United States.

Significant Share of Immigrant Students Are Low Income

- One half of children of immigrants and two-thirds of ELL children are low income.

Large Number of Districts, Devolved Character of Education

- There are approximately 14,500 school districts in the United States.

See, generally, R. Capps, M. Fix, J. Murray et. al. The New Demography of America's Schools: Immigration and the No Child Left Behind Act, Urban Institute, September 2005.

- Imposes a first-time federal requirement that ELLs make progress in English;
- Requires that every bilingual and ESL classroom have a qualified teacher; and
- Requires parent involvement efforts targeted to ELL and low literate parents.

Status. While major legislative changes in the law were not anticipated at the time of the Roundtable, state restiveness with what are often viewed as unfunded federal mandates was leading to litigation and to threatened state defections. In fact twenty-one states recently have proposed legislation to withdraw from the law and give up the federal funding that it provides.¹

Funding. Funding issues also served as a backdrop to the discussion. President George W. Bush's FY 2006 Department of Education budget calls for a modest decrease in overall federal funding for K-12 education (\$530 million in a \$56 billion education budget). However, the drop comes as the President has proposed significantly expanding NCLB's testing and accountability reach to high schools and as student proficiency standards are ratcheted up in accordance with the NCLB. Moreover, the President's proposed budget eliminates some programs that serve ELL students and parents (e.g., the Even Start Program). In addition, overall annual spending for the NCLB is well below Congressional appropriations. In FY 2004, Congress authorized \$18.5 billion for Title I, but only \$12.3 billion was spent.²

1 For more information, see the National Education Association, "21 States Seek Changes to No Child Left Behind Act," April 2005, <http://www.nea.org/lawsuit/stateres.html>.

2 National Education Association, "Education Funding: By The Numbers," May 2004, <http://www.nea.org/esea/eseafunding.html?mode=print>.

Early Impacts of NCLB on ELL and Immigrant Students

What impact has the NCLB had on ELLs and immigrant students? The Center for Education Policy (CEP)³ surveyed state and district school officials regarding their perceptions of NCLB impacts and implementation. Survey respondents reported that the law's effects included:

Increased Attention to ELLs. The law has drawn new, increased attention to the academic achievement of ELLs. Most school officials report that ELLs are either closing the gap or staying even with other students. However, 56 percent of districts in the United States reported that the ELL subgroup was too small to track, frustrating efforts for a more comprehensive analysis of nationwide data.

Inflexibility. Despite this progress, the CEP report found that ELL academic assessment and reporting policies are too inflexible and the law does not provide enough time for ELL students to acquire adequate English language proficiency. While the Department of Education made efforts to make ELL-related policies more flexible in February 2004,⁴ districts and states want still more flexibility for testing ELLs.

Decline in Native Language Teaching. The CEP survey respondents found a decline in the teaching of ELLs in their native languages as greater emphasis is placed on helping ELLs acquire English.

Capacity Issues. Tough challenges remain for developing the institutional capacity needed to realize the intent of the NCLB. These challenges include the hiring and training of a sufficient number of qualified bilingual education teachers, as well as the hiring of content area teachers (e.g., science) with training in teaching ELLs; accurate

3 Center for Education Policy, "Report on the No Child Left Behind Act, Year 3," March 2005, <http://www.ctredpol.org/pubs/nclb3/>.

4 On February 19, 2004, the Department of Education stated that English proficiency and math assessment scores of first year ELLs do not have to be counted toward measures of adequate yearly progress, and that states may include Redesignated Fluent English Proficient students (former ELL students who have attained English proficiency) for up to two years when calculating adequate yearly progress. See Department of Education, "Secretary Paige Announces New Policies to Help English Language Learners," February 19, 2004, <http://www.ed.gov/news/pressreleases/2004/02/02192004.html>.

assessment of ELLs' English language and content area knowledge; high levels of student mobility; and difficulties in providing notification to the parents of ELL students.

Local immigrant advocates echoed some of these concerns and raised additional ones:

Push Outs, Drop Outs, and Limited Language Capacity. It was reported that while it is illegal to prevent students from enrolling in the K-12 system, access continues to be a problem for ELL students, at least in New York City. Incentives to reduce dropout rates have led perversely to secondary schools' refusing admission to ELL students or to their being effectively "pushed out" before they reach their junior or senior years. Although ELLs have the highest dropout rates of any subgroup in New York City schools, former ELLs who exit (or "graduate") from language programs have very high graduation rates. Parents' own limited language abilities mean that they cannot serve as effective advocates. Further, even in New York City, where there is strong backing for policies that support ELLs, interpretation and translation services that meet the needs of non-English-speaking parents are limited.

Instruction. New, increased emphasis on English language instruction has meant that ELLs — including those who entered school when they were older (late entrants) — are offered little instruction in their native languages and are frequently taught in English-only classrooms where the content is inaccessible. Further, for many ELLs, there are few tests that can accurately gauge their content knowledge in their native language.

SELECTED REFORM OPPORTUNITIES

Despite concerns about implementation of the NCLB, a number of opportunities were identified that might improve schools for ELL and immigrant children.

Expanding Pre-K Instruction. The importance of Pre-K instruction for school readiness among ELL students and families was strongly emphasized. Children of immigrants are underrepresented in center-

based childcare generally,⁵ and those whose parents have the least amount of education are the least likely to participate. Yet parents with limited education stand to gain the most from enrollment. Pre-K programs are also typically only part-day, often limiting their value to working parents. New York City and the New York Immigration Coalition have been considering ways to extend the care offered to better suit the needs of working immigrant parents. A recent evaluation of Oklahoma's universal pre-K program found that language and cognitive test scores improved among those enrolled, with Hispanic students making the greatest gains.⁶

Restructuring Schools. Education reformers have proposed a number of structural changes to accommodate ELLs and immigrant students. These reforms include a longer school day, block scheduling, summer school, and more encouragement for students to continue their school careers after age 18. Other institutional changes advocated include removing barriers between ESL and content (e.g., social studies) teachers when it comes to planning, curriculum and professional development.⁷ Participants urged that the "small schools" reform movement be evaluated to determine whether ELL and immigrant students are being served and how successful small schools are in meeting these students' language needs.

More broadly, participants raised questions about the suitability of the mainstream school system in general for immigrant students arriving in middle and high school who do not speak English and whose education in their home countries may have been interrupted. The tension between including ELLs in mainstream classrooms or in separate

5 See Peter Brandon, "The Child Care Arrangements of Preschool-Age Children in Immigrant Families in the United States." *International Migration* 42:1 (2004); and Randy Capps, Michael Fix, et. al., "The Health and Well-Being of Young Children of Immigrants." Urban Institute, 2004, http://www.urban.org/UploadedPDF/311139_ChildrenImmigrants.pdf.

6 William Gormley and Deborah Phillips, "The Effects of Universal Pre-K in Oklahoma: Research Highlights and Policy Implications," Public Policy Institute, Georgetown University, October 2003, <http://www.fcd-us.org/uploadDocs/Georgetown%20Gormley%20Phillips.pdf>.

7 Jorge Ruiz-de-Velasco and Michael Fix with Beatriz Chu Clewell, *Overlooked and Underserved: Immigrant Children in U.S. Secondary Schools* (Washington, DC: Urban Institute, January 1998).

settings that might better meet their language needs in turn raises other issues. Have the number of newcomer schools changed following the NCLB's enactment? Where do these schools fit in state accountability systems? And how successful are they in meeting state standards?

Addressing Drop outs and Push outs. Concerns about possible high levels of push-outs and drop-outs are partially addressed within the context of the pending Workforce Investment Act (WIA) reauthorization. One Senate proposal would require special data collection and reporting on 16- to 18-year-olds enrolling in adult ESL programs,⁸ thereby offering one gauge of changes in drop and push out rates.

Pursuing Lawsuits on Funding and Fiscal Equity. What may be one of the most effective, long-term vehicles for reform for immigrant and ELL students is the set of fiscal equity lawsuits that are proceeding in New York and other major school districts.⁹ These school funding lawsuits address such issues as the state's role in assuring equitable spending among districts and providing suitable school facilities and adequate funding for ELLs and other at-risk students.¹⁰ One challenge is ensuring that immigrant organizations are included among the coalition of plaintiffs that shape the litigation and the remedies that flow from it. Here again, there appeared to be lessons to be learned from the New York City experience.

Passing the DREAM Act. The DREAM Act's implications for improving immigrant students' high school completion rates and their pursuit of post-secondary education were also discussed. The Act — a bi-partisan proposal that has now been before the Congress for several years — would offer a path to legal status for unauthorized students graduating from high school after attending US schools for at least five years. The Urban Institute has estimated that there are 1.6 million unauthorized children

8 United States Senate, "Lifetime of Education Opportunities Act of 2005," S. 9, 109th Cong. 2nd Sess (2005).

9 *Campaign for Fiscal Equity v. State of New York*, (S.Ct., NY Co., DeGrasse, J), February 14, 2005.

10 A new national partnership has been established to tackle the issues of teaching in at-risk schools. See Education Commission of the States, "Teaching in At-Risk Schools Focus of a New National Partnership," February 2005, <http://www.ecs.org/clearinghouse/58/24/5824.htm>.

in the United States and that 65,000 of these children graduate from high school each year.¹¹ One impact of the law would be to qualify these unauthorized students for in-state tuition in state community and four-year colleges. It was asserted that the law would improve unauthorized students' incentives to graduate from high school, thereby increasing the probability that their schools will meet NCLB accountability standards.

Bridging Immigration and Education Policy Advocacy. K-12 education issues are among the most devolved set of policies that immigration advocates tackle. There are approximately 14,500 school districts in the United States, and key policy matters are handled differently not only across states and districts, but also schools and even classrooms. While education is among the most important policy issues for immigrants, education policy — like public benefits policy — is complex and abstruse. These characteristics create high barriers to advocates' ability to enter the policy arena.

The devolved character of education issues, coupled with their significance, suggests the value of connecting grassroots immigration organizations with each other and with national education and immigration experts. One model might be the nascent Kellogg Foundation-sponsored immigrant education network that involves the New York Immigration Coalition, the Urban Institute, and the Migration Policy Institute. The goal of the network is to build a knowledge base on education reform's state and local level impacts that is comparable to the one developed over the past decade on welfare reform. The potential value of networks was reinforced by the group's discussion of education's power as a political organizing focus within newcomer communities.

Undertaking Comparative Studies. Conference participants noted that the global challenges of educating newcomer students underscored the value of careful comparative studies of successful practices and policies. One possible study candidate would be English and French immersion programs in Canada.

11 Jeffrey Passel, Randy Capps, and Michael Fix, "Undocumented Immigrants: Facts and Figures," Urban Institute, January 2004, <http://www.urban.org/Template.cfm?Section=ByAuthor&NavMenuID=63&template=/TaggedContent/ViewPublication.cfm&PublicationID=8685>.

WORK AND WORK SUPPORTS

The second session of the conference initially focused on three issues: training and work supports delivered to low-wage immigrant families; the conditions of work among low-wage immigrants; and the states' ambivalent attitude toward the new labor-driven migration.

The Policy Context: Reauthorization of the Temporary Assistance for Needy Families and the Workforce Investment Acts

There are two major legislative proposals pending reauthorization that could have a significant impact on training and other supports for low-income immigrant workers: the Temporary Assistance for Needy Families (TANF) Act and the Workforce Investment Act (WIA).

TANF Reauthorization. The 1996 welfare reform law made most legal immigrants arriving after 1996 ineligible for TANF and other programs deemed to be “federal means-tested public benefits.” These include Food Stamps, Supplemental Security Income, Medicaid, and the State Child Health Insurance Program (unauthorized immigrants were already excluded from these benefits). Exclusion from TANF not only restricts legal immigrants' eligibility for cash benefits, but their eligibility for job training delivered through the TANF system.¹² Bars on TANF receipt also make legal immigrants less likely to receive childcare subsidies.

Both the current House and Senate versions of the long overdue TANF reauthorization leave restrictions on immigrant benefits in place.¹³ The House version of the bill would limit education and training for noncitizens as well as other welfare recipients.

12 House Ways and Means Committee, “Section 7 — Temporary Assistance for Needy Families,” in *Greenbook* 2003, <http://waysandmeans.house.gov/media/pdf/greenbook2003/Section7.pdf>. As it turns out, though, this exclusion from training has only a modest impact, as the law's strong emphasis on “work first” has meant that only 7 percent of all adults participating in TANF receive education or training and only 2 percent of total TANF program funds are spent on education and training.

13 To date the TANF bill has been reauthorized without significant changes to the text itself.

Fast Facts:

Immigrants' Representation in the Workforce and Low-Wage Workforce

- One in two new entrants to the US labor market in the 1990s was an immigrant.
- While one in nine US residents is foreign-born, one in seven US workers, and one in five low-wage workers, is foreign-born.

Immigrant Labor Force's Hourglass Shape

- The immigrant workforce resembles an hourglass: immigrant workers are as likely as natives to hold a BA or more (28 percent).
- One in five doctors in the United States is foreign-born.
- Nearly half of immigrant workers earn low wages (i.e., less than 200 percent of the minimum wage).
- Sixty-two percent of low wage immigrant workers are LEP.
- Forty-five percent of low wage immigrant workers have less than a high school education.

Poverty within Working Immigrant Families

- Of working immigrant families with children, 41 percent are low-income versus 21 percent of working native families.
- Children of immigrants in low-income working families are twice as likely to be uninsured as children of natives.

Persistence of Low-Skilled Jobs

- Two-thirds of all jobs expected to be produced over the next ten years can be considered low-skilled jobs.

**See, generally,* R. Capps, M. Fix and J. Passel, "A Profile of the Low Wage Immigrant Labor Force," Urban Institute, 2003.

WIA Reauthorization. WIA's Title I is the principal federal funding vehicle for job-training programs. Historically, LEP adults made up a small share of those receiving training (6 percent in 2001). And indeed, following the law's enactment in 1998 there were overall declines in the number of persons enrolled in federal job-training programs. While the House reauthorization bill (HR 27)¹⁴ contains fewer

14 United States House of Representatives, "Job Training Improvement Act of 2005," HR. 27, 109th Cong. 2nd Sess (2005).

significant changes that affect the LEP population, the Senate bill (S 9)¹⁵ appears much more responsive to the needs of immigrant workers. It encourages services for “hard to serve groups” (including LEPs); provides new incentives to serve LEP adults; modifies performance measures so that the difficulty of serving non-English-speaking adults is taken into account; authorizes training programs that integrate skills and English language learning; and authorizes \$10 million for demonstration projects involving LEP workers.

ESL and Adult Education. Title II of WIA focuses on adult education and family literacy. Nearly 1.2 million adults attended ESL classes in 2002-2003, representing 43 percent of all enrollees in adult education.¹⁶ Currently nearly 7.4 million working-age adults are limited English proficient. The pending reauthorization bills in the House and Senate would make LEP assistance an explicit goal and encourage the federal and state governments to promote relevant activities. At the same time, though, the Administration has proposed cutting funding for adult education (and by extension ESL) from \$569 to \$207 million, resulting in the possible loss of Title II services to an estimated 470 million individuals a year.

Conditions of Work and Health Care. Looking beyond the policy concerns raised by TANF and WIA authorization, there is a deep, underlying economic challenge to increasing the mobility of low-skilled immigrants. Two-thirds of all jobs for the next ten years will require few skills.¹⁷ Given the fact that benefits add 38 percent to worker compensation packages, it is not surprising that many low-wage workers are uninsured.

The problem of limited health coverage in immigrant populations is compounded by the presence of conditions that create poor health. For example, low wages and benefits have been associated with the overcrowded living conditions of immigrant families, which in turn have been linked to poorer health among immigrant children. Limited enforcement

15 See n. 8.

16 Department of Education, “State Administered Adult Education Program: Program Year 2002-2003 Enrollment,” July 2004, <http://www.ed.gov/about/offices/list/ovae/pi/AdultEd/datatables/2002-2003enroll.xls>.

17 Demetra Smith Nightingale and Michael Fix, “Economic and Labor Market Trends,” *Children of Immigrant Families, The Future of Children*, Vol. 14, Issue 2, Princeton-Brookings: 49-52.

of safety standards may also reduce workers' health. Anecdotal evidence suggests that many unauthorized workers are earning less than the minimum wage and that safety standards are frequently violated. At the same time, the number of federal inspectors examining health, occupational, safety, and wage and hour violations has declined.

Ambivalence. Across states, responses to the largely labor-led migrations of newcomers through the 1990s have been extremely uneven. They range from legislative extensions of in-state tuition for undocumented students to new punitive laws in Arizona that bar unauthorized immigrants from selected benefits, and, perhaps more importantly, threaten to prosecute state workers who provide them. Similarly, while there has been a patchwork of state responses to welfare reform's withdrawal of federal spending on benefits to recent legal immigrants, on balance, states have been surprisingly generous in filling the gap left by federal exclusions.

State ambivalence toward immigration has been deepened by wavering federal fiscal support to offset immigration's impacts — most notably the elimination of federal funding of the Criminal Alien Program that helped states defray unauthorized criminal aliens' detention costs. It was suggested that legalization and other immigration reform proposals that do not anticipate increased state and local spending may deepen some states' ambivalence about, and resistance to, immigration.

SELECTED REFORM OPPORTUNITIES

In a wide ranging discussion, a number of reform opportunities were identified.

Authorizing States to Use TANF for Post-1996 Immigrants. One no-cost strategy for the federal government would be to authorize states to use their TANF block grant funds to extend TANF benefits and services to legal immigrants arriving after 1996. (Roughly half of the 10.5 million legal permanent resident population received their "green cards" after 1996.) Currently, federal funds cannot be used for these purposes.

Improving Asset Management. The ability of immigrant workers to manage their finances, including banking, investments, and tax filings, can also have an impact on their quality of life. Economic literacy training and enforcement of consumer protection laws against those who prey on newcomer communities can help immigrants avoid debt and the impacts of tough new federal bankruptcy laws.

Leveraging Employers' Interest. The focus of policy discourse on public workforce training programs has discounted the critical role and interests of employers. Those who are concerned with integrating the immigrant workforce need to examine more closely the role of employers in developing workers' hard and soft skills and assess their efforts to increase workers' language and job skills and credentials. (One example is cross training agricultural workers in multiple crops so that they can find employment year-round.) After all, it was noted, businesses' share of GDP is eight times larger than that of the public sector (\$9.0 trillion versus \$1.3 trillion).¹⁸

Efforts to more deeply involve employers in the training of low-wage workers need to take into account, though, the fact that training programs have historically targeted better educated and higher paid workers.

Exploring Other Possibilities. Participants raised other opportunities for improving the well-being of workers and their families. These include:

- Building on state minimum wage campaigns, focusing in particular on enforcement;
- Examining the proposed Agricultural JOBS Act, which may serve as a model for future employer-government-immigrant cooperation on workforce and integration issues. Key pro-worker provisions include minimum work guarantees, transportation reimbursement, and granting workers a private right of action for enforcing benefit payments;
- Developing creative funding mechanisms, such as using fines from labor and immigration law violators to support ESL and expanded enforcement efforts; and
- Exploring the mechanics and equities of privately financed health benefits paid for by pools of newcomers.

18 See Council of Economic Advisors, "Economic Report of the President: 2005 Report," 2005, <http://a257.g.akamaitech.net/7/257/2422/17feb20051700/www.gpoaccess.gov/eop/2005/B10.xls>.

CIVIC INTEGRATION: NATURALIZATION AND THE REDESIGN OF THE CITIZENSHIP TEST

The Policy Context: Changes in the Naturalization Test

Naturalization has historically been a key integration indicator, signaling both the society's acceptance of the immigrant as "its own," and the immigrant's commitment to membership. In the wake of the 1996 welfare reform law and the September 11 terrorist attacks, the meaning of citizenship has arguably changed, and its importance has been elevated. Citizenship is increasingly a prerequisite for participation in the social welfare state and for residential security.

To obtain citizenship, the law requires that legal immigrants demonstrate the ability to use "ordinary" English (simple words and phrases)

Fast Facts:

Rapid Rise in the Number of Naturalized Citizens

- The number of naturalized citizens almost doubled from 6.5 to 11 million between the mid-1990s and 2002.

Large Number of Eligible Immigrants Who Have Not Naturalized

- Although the numbers and rates of naturalization have improved, a large pool of immigrants — eight million — are eligible to naturalize but have not done so.

Many Eligible Immigrants are LEP and Have Low Levels of Education

- Sixty percent of immigrants eligible to naturalize are limited English proficient.
- Twenty-five percent of these "eligibles" have less than a ninth grade education.
- Forty-one percent of "eligibles" are low income.

See, generally, M. Fix and J. Passel, "Trends in Naturalization," Urban Institute, 2003.

and a knowledge and understanding of US history and government. However, the law does not specify how such knowledge should be tested, or in what language the history requirements should be demonstrated. Applicants for citizenship have traditionally taken an oral exam with an adjudicator. However, that process has not been sufficiently standardized and has come under criticism.

At the time of the Integration Roundtable, the two-year-old administrative process to redesign the citizenship test overseen by the US Citizenship and Immigration Services (USCIS) Office of Citizenship (within the Department of Homeland Security) had reached a critical stage. The process and its early results had been the subject of a critical report by a panel of the Board on Testing and Assessment of the National Academies. Among other things the Board had urged that USCIS adopt a rigorous *test development process* akin to that used to develop other high stakes tests administered by schools or licensing agencies (e.g., the SAT).

With several important decisions about to be announced, the session on civic integration examined the advantages and disadvantages of the citizenship test now in use, the risks of a new proposed test (i.e., the one that had been reviewed by the National Academies), and alternatives to both tests.

It was revealed soon after the Roundtable that the introduction of a new citizenship test was slated for January 2007 (delayed from 2006) and that USCIS' contract with the National Academies to examine the reliability, validity, and fairness of the redesigned test would be cancelled.

Benefits and Costs of the Old Model. The “old” citizenship test, which is still in use, includes an oral interview, questions about history and government selected from a pre-distributed list, and a simple dictation test of the English language. It provides an opportunity for one-on-one interaction with the test administrator, and allows the examiner to exercise “due consideration” that can take into account such characteristics as age, education level, and refugee status.

The test has a number of advantages and disadvantages. Applicants who know ordinary English (i.e., simple words and phrases) have a good chance of passing the test. Nonetheless, the test is also open to criticism. The conversation-based test (which can include a discussion of eligibility problems raised by the petitioners' application) is hard to standardize and can go beyond the bounds of ordinary English. Few quality control standards were in place during the development of the history and government questions (it is claimed that they were developed by two INS officers over a weekend), and the answers can be memorized without meaningful engagement with the ideas.

The goals of the redesign process were to:

- Standardize the process for demonstrating the statutory competencies; and
- Make the test more meaningful, particularly the understanding of history and government.

The English component was not addressed, although it indirectly comes to bear in the test redesign process.

Risks of the Recently Developed Test. The National Academies and a number of other stakeholders see value in the test redesign, but they have misgivings about elements of the proposed redesign model. One clear policy concern is the comparatively large share of the eligible population with low education levels and limited English skills who could be effectively barred from citizenship by a more difficult test.

Some participants contended that a new redesign process would adequately protect vulnerable subgroups, noting that the government was preparing additional education materials to help train and instruct on the new test. They also noted that the government intends to use a multi-agency federal taskforce to expand outreach to new Americans.

SELECTED REFORM OPPORTUNITIES

One alternative to current practices would be a naturalization process that emphasizes civic involvement as a criterion for becoming a citizen. Civic involvement could be demonstrated by a range of possible initiatives, such as working with community leaders on local problems.

Even if the standardized test moves forward, there are a number of alternative ways for applicants for citizenship to demonstrate knowledge of history and government, including their own civic involvement or by testing in the individual's native language. Roundtable participants also suggested creating an independent task force to serve as a liaison between USCIS, communities, advocacy groups, and educational providers.

Whatever direction the redesigned test might take, several reforms should be considered:

- Funding the development of high quality multimedia materials to engage students in history, government, and English language learning;
- Enlisting bilingual speakers to help as tutors (college students in service learning programs or Americorps, for example); and
- Conducting meaningful and thorough research on vulnerable subgroups and on citizenship denials.

INTEGRATION POLICIES ON THE GROUND: LESSONS FROM THE BUILDING THE NEW AMERICAN COMMUNITY PROJECT

The Policy Context: Building Local Capacity

The Building the New American Community (BNAC) Project¹⁹ represented an experiment in jump-starting integration policies in three mid-sized cities with growing and diverse immigrant populations. The experiment, which was funded by the US Office of Refugee

Fast Facts:

Rise in Immigrant Population in Nontraditional Immigrant Gateway Cities

- The foreign-born make up 5 percent of the population in Nashville, Tennessee; 12 percent in Portland, Oregon; and 22 percent in Lowell, Massachusetts. Eleven percent of the US population is foreign-born.
- Growth rates varied, though: between 1990 and 2000, the foreign-born in Nashville and Portland grew by more than 100 percent; in Lowell the rate was 37 percent, almost all of it at the end of the 1990s. Nationwide, the immigrant population grew 57 percent during this period.

Selected Integration Indicators

- Language Isolation. Some communities are more linguistically isolated than others. Two percent of Nashville's population is linguistically isolated, versus 11 percent in Lowell and 4 percent in Portland. Four percent of the US population is LEP.
- Naturalization Rates. All three cities had comparatively low naturalization rates. In Nashville and Lowell, about 30 percent of the foreign-born are naturalized; in Portland, 34 percent. Forty percent of the immigrant population nationwide is naturalized.

See, generally, B. Ray, Building the New American Community, Migration Policy Institute, 2004.

Resettlement (ORR), centered on new and existing immigrant and refugee coalitions in Nashville, Tennessee; Portland, Oregon; and Lowell, Massachusetts. It involved five national partners: The National Conference of State Legislatures, the Southeast Asia Resource Action Center, the National Immigration Forum, the Urban Institute, and the Migration Policy Institute. The presentation and discussion focused on the daunting challenges faced by the projects, and by extension, the capacity of policy itself to accelerate affirmative integration progress.

The guiding principle behind the BNAC project was integration as a two-way process between communities and immigrant populations. Implicit in this definition is that integration involves the whole population, not just the most recent arrivals; integration cannot be achieved overnight; and significant regional variation in integration processes exists, particularly in new versus established immigrant communities. Thus, the project attempted to look at “new gateway communities,” through an experiment in how different levels of government and civil society organizations (at an institutional level) could cooperate to obtain positive integration outcomes. BNAC was not an effort to directly provide services, but to provide integration-focused community interventions for independent action in three communities over a three-year period.

Lessons Learned From BNAC

There were a number of particular challenges at each BNAC site that impeded integration. These included:

- The lack of strong leadership;
- An inability to penetrate established practices and traditional ways of doing things;
- Legal and program distinctions between groups of immigrants — including refugees, immigrants, temporary migrants, and the unauthorized — that complicated the search for good integration options; and
- The failure to obtain sustained funding sources.

As a result, particular areas of integration, including employment and social measures, suffered.

Despite these obstacles and the mixed on-site results that followed, a number of lessons for future policymakers can be drawn from the experience:

- **Integration Must Extend Beyond the “Usual Suspects” to Engage Mainstream Policymakers and Institutions.** From public transit authorities to the police, every community organization is substantially affected by integration. Because stakeholders in the broadest sense have the ability to leverage additional resources, support, and capacity for integration, each potential member organization and pre-existing relationships between them should be assessed.
- **The Immigrant Community Must Lead the Way.** Not only must the local community support integration, but it must encourage leadership training for immigrants and refugees, as well, to give them the capacity to express their own interests. Receiving communities must also acquire the resources to better understand refugee and immigrant settlement and cultural practices — beyond the perfunctory cultural sensitivity training.
- **Civic Engagement Is Not Just Voting.** While voting initiatives and education are possible ways to encourage immigrant participation, other methods of civic engagement — including participation in crafting policies and legislation, interaction with policymakers, and expansion of policymaker understanding of the community — can also be effective methods to give immigrants a stake in the community.

SELECTED REFORM OPPORTUNITIES

Framework. A number of policy areas must be addressed in a national integration policy, including:

- Employment, skills, and credentials recognition;
- English language training;
- Youth development and education; and
- Relationship building between organizations.

These issues are all complex, multidisciplinary, and suited to coalition-building. If they are successfully leveraged, they can lead to economic self-sufficiency, social mobility, and meaningful civic participation for all involved communities.

Policy Decisions. In addition, there are a number of decisions to make for a successful integration policy, including:

- What model should be used? BNAC-like structures? The existing structure of government and private agencies? A hybrid of the two?
- How can strong intergovernmental relationships be established? Partnerships between public, non-profit, and private entities?
- How can finite resources such as time and finances be successfully balanced?
- To what extent should integration policy be lodged at federal, state, and local levels?

INTEGRATION POLICY: LOOKING TO THE FUTURE

The conference explored a number of future directions for policymakers, government, and the field.

Institutional Infrastructure

Population change, dispersal, and policy ferment at all levels of government — all underscore the need for something more than skeletal integration policies. Nowhere is this mismatch more concretely illustrated than by the absence of an agency to oversee or even monitor integration at the federal level and within most states. At the threshold level, then, there is an institution-building challenge.

Developing Expertise within State and Local Governments

As the population has grown larger and more diverse, and as policies have grown more complex, there is a need to deepen the expertise of the public servants who administer the myriad programs that will drive the pace of integration. Expertise needs to be expanded in areas such as demographic forecasts; the costs and financing of programs that affect integration; the legal and rights frameworks within which state and local governments operate; and the practices that hold the most promise.

Deepening the Knowledge Base

While the expertise of policymakers and administrators needs deepening, the knowledge base on integration should also develop further:

- Our understanding of generational progress — perhaps the best way to measure integration — is only now evolving.
- We have few good empirical studies of programs that teach language and job skills to newcomers or language and academic subjects to their children. (The ongoing assessment of the Oklahoma Universal Pre-School Program's effects on ELL children and families may offer a particularly promising model.)
- We are only at the beginning of efforts to define, identify, and disseminate good practices and to understand their total and incremental costs.
- In this era of intensifying global migration, the potentially powerful results of comparative studies have only begun to be tapped and disseminated.
- We need to evaluate both the potential and the quality of new data sources that could shed light on the integration of immigrants and their children. Examples include the Census' American Community Survey and the expanded use of the National Assessment of Education Progress to gauge the progress of ELL students.

Building Institutional Bridges

As the numbers of immigrants grow, it has become increasingly apparent that integration will be driven more by mainstream than immigrant-targeted policies. For both political and technical reasons, support is needed to help connect organizations with expertise in immigrant communities with those with expertise and constituencies in fields like education, testing, health, and the like.

Education Reform

Participants acknowledged that immigrant advocates have generally shied away from addressing education policy. Education policies are highly devolved and the laws are so complex that the barriers to entry for immigrant organizations have often been prohibitively high.

Nonetheless, recent education reforms offer levers that have not been available before. The controversial NCLB not only requires that schools identify and test immigrants and ELL students, but it holds them accountable for making fairly fast progress *and* imposes strong sanctions if they fail. Further, population change, combined with the prospect of sanctions, may be opening schools and states to progressive changes in immigrant education that will need to be carefully documented. Fiscal equity lawsuits may also offer additional levers for change.

Immigrants and Work Supports

The nation is approaching the tenth anniversary of the 1996 welfare reform law that barred many *legal* immigrants in working families from benefits. Most immigrants arriving after 1996 are not eligible for federal benefits until they naturalize. As more than half of today's legal immigrants arrived after 1996, the restoration of public benefits to legal immigrants remains an abiding policy issue. Sustained research efforts will be needed to update trends in benefit use within newcomer populations and consider their implications for intergovernmental fiscal equity.

Public and Employer-Based Workforce Training

Serious concerns were expressed regarding steep proposed cuts in federal support for adult basic education and adult ESL. What would they mean if implemented? Are immigrants underserved by WIA? Beyond the role of the public sector, a strong message came through that the interests of employers need to be more effectively leveraged and a deeper understanding developed of good practices that may be evolving in the private sector regarding skills training, language development, and credentialing.

Immigrant Access to Naturalization

A crucial and related issue is the access of immigrants to citizenship and the ongoing effort to rewrite the nation's citizenship test. Will the revision result in a harder test that will serve both immigrants and the country as a whole less well? Will it require higher English language skills? Will innovative test alternatives — such as giving applicants credit for civic participation — be considered? There may be a need for a rigorous ongoing review process to ensure that future tests meet the standards for reliability, validity, and fairness expected of high stakes tests. At a minimum, a systematic mapping of the supply of language services available to prospective test takers is needed.

Language and Integration

Half of immigrant workers in the United States are LEP, and LEP status is more highly correlated with multiple measures of hardship (e.g., hunger) than being unauthorized. One conclusion to be drawn is that the United States may not only need an *integration* policy, but also a *language* policy — one less subject to the vicissitudes of the ever present culture wars and much more instrumental, comprehensive, and technology-based. Research can also lead the way. One step might be to better understand the lessons from implementing the far-reaching Clinton/Bush Executive Order calling for federal agencies to make their programs and communications linguistically accessible.

Integration and Comprehensive Immigration Reform

Finally, while it was not an express topic of the Roundtable, discussion of state responses and ambivalence to immigration made clear that future debates over comprehensive immigration reform would open up a number of integration issues. They include:

- The implications of legalization proposals for aid to state and local governments, perhaps along the lines of the 1986 State Legalization Impact Assistance Grants;
- The implementation challenges raised by possible requirements that legalizing immigrants will need to display some level of English and civics knowledge. Who will pay? Is the infrastructure in place to provide it at the needed scale?
- The equity and design challenges of developing a privately financed system for providing health insurance to the legalizing population; and
- The need for, and cost of, a major longitudinal survey that tracks the integration of legalizing immigrants and their families. Is there a role here for philanthropy?

APPENDIX A: IMMIGRANT INTEGRATION ROUNDTABLE AGENDA

Agenda Immigrant Integration Roundtable

March 25, 2005

10:00 a.m. – 2:30 p.m.

- Goals:**
1. Develop a shared understanding of recent and pending policy developments and proposals
 2. Assess the opportunities and the risks they present
 3. Begin to frame a policy and research agenda

10:00 a.m. Introduction

Michael Fix – Vice President and Director of Studies, Migration Policy Institute

10:10 a.m. Session One: Immigrant Education (Pre-K through 12th Grade)

Moderator: Ruby Takanishi – President and CEO,
Foundation for Child Development

Speakers: Margaret McHugh – Executive Director,
New York Immigration Coalition
Patricia Sullivan – Director, Center on Education Policy

11:20 a.m. Session Two: Work and Work Supports

Moderator: Olivia Golden – Senior Fellow, Urban Institute

Speakers: Mark Greenberg – Director of Policy,
Center for Law and Social Policy
Susan Drake – Former Director,
National Immigration Law Center
Sheri Steisel – Director of Human Services,
National Conference of State Legislatures

12:45 p.m. – 1:15 p.m. Lunch

1:15 p.m. Session Three: Civic Integration and Naturalization

Opening: Kathleen Newland – Director, Migration Policy Institute

Moderator: Frank Sharry – Executive Director,
National Immigration Forum

Speakers: Brian Ray – Professor, University of Ottawa
Heide Spruck Wrigley – Senior Researcher,
Literacy Work International
Nguyen Van Hanh – Director,
US Office of Refugee Resettlement

2:20 p.m. Conclusion

Demetrios Papademetriou – President, Migration Policy Institute

APPENDIX B: PARTICIPANTS LIST

Alfonso Aguilar	Director, Office of Citizenship, US Citizenship and Immigration Services
Josh Bernstein	Director of Federal Policy National Immigration Law Center
Jonathan Blazer	Public Benefits Policy Attorney National Immigration Law Center
Diana Bui	Independent Consultant, Building the New American Community Initiative
Randy Capps	Senior Research Associate Urban Institute
Betsy Cooper	Research Assistant Migration Policy Institute
David Dixon	Associate Policy Analyst Migration Policy Institute
Susan Drake	Former Director, National Immigration Law Center
Howard Duncan	Executive Head, Metropolis International Secretariat
Michael Fix	Vice President and Director of Studies Migration Policy Institute
Shawn Fremstad	Deputy Director, Welfare Reform and Income Support Division, Center on Budget and Policy Priorities
Olivia Golden	Senior Fellow Urban Institute
Raul Gonzales	Legislative Director National Council of La Raza
Mark Greenberg	Director of Policy Center for Law and Social Policy (CLASP)

Kimberly Hamilton	Managing Editor Migration Information Source
Nguyen Van Hanh	Director US Office of Refugee Resettlement
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Chung-Wha Hong	Deputy Director New York Immigration Coalition
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Ruby Takanishi	President and CEO Foundation for Child Development
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Martin Wera	Program Assistant Annie E. Casey Foundation
Heide Spruck Wrigley	Senior Researcher Literacy Work International

APPENDIX C: ADDITIONAL RESOURCES

SESSION ONE: PRE-K THROUGH 12TH GRADE EDUCATION

ESEA AND LEP Students: New Requirements, New Challenges

The National Education Association ESEA Action Guide, Aug. 2002

Challenges in the NCLB for English Language Learners

CRESST, Winter 2004

DREAM Act Basic Information

National Immigration Forum, Feb. 2005

The Health and Well-Being of Young Children of Immigrants

Urban Institute, Feb. 2005

The New Demography of America's Schools: Immigration and the No Child Left Behind Act

Urban Institute, Sept. 2005

SESSION TWO: WORK AND WORK SUPPORTS

Immigrants and Welfare Use

Migration Policy Institute, Aug. 2002

Immigrants, Persons with Limited Proficiency in English and the TANF Program: What Do We Know?

Center for Budget and Policy Priorities, Mar. 2003

The Language of Opportunity: Expanding Employment Prospects for Adults with Limited English Skills

Center for Law and Social Policy, Aug. 2003

Children of Immigrants Show Slight Reductions in Poverty, Hardship

Urban Institute, Nov. 2003

Health Insurance Coverage of Children in Mixed-Status Immigrant Families

Urban Institute, Nov. 2003

Profile of the Low Wage Immigrant Labor Force

Urban Institute, Nov. 2003

The Foreign-born in the U.S. Labor Force: Numbers and Trends

Migration Policy Institute, Jan. 2004

What Kind of Work Do Immigrants Do? Occupation and Industry of Foreign-Born Workers in the United States

Migration Policy Institute, Jan. 2004

Why Funding for Job Training Matters

Center for Law and Social Policy, May 2004

Food Stamp Actions for Immigrants: How States Have Implemented the 2002 Farm Bill Restorations

National Conference of State Legislatures, Aug. 2004

Children of Immigrant Families: Analysis

Children of Immigrant Families, Future of Children, Princeton-Brookings, Summer 2004

Federal Policy for Immigrant Children: Room for Common Ground

Woodrow Wilson School of Public and International Affairs, Princeton University, 2004

Immigrant Priorities for WIA Reauthorization*National Immigration Law Center, 2004***Workforce Investment Act Reauthorization Materials and Immigrants Rights Update***National Immigration Law Center, 2004***SESSION THREE: CIVIC INTEGRATION AND NATURALIZATION****Trends in Naturalization***Urban Institute, Sept. 2003***Migration Information Source Special Issue on Integration and Immigrants***Migration Policy Institute, Oct. 2003***Election 2004: The Latino and Asian Vote***Urban Institute, July 2004***Immigrants to Citizens: A Role for State Legislatures***National Conference of State Legislatures, July 2004***Power and Potential: The Growing Electoral Clout of New Citizens***Immigration Policy Center, Oct. 2004***Building the New American Community***MPI, NCSL, National Immigration Forum, SEARAC, Urban Institute, Dec. 2004***Redesign of the U.S. Naturalization Test: Interim Report***National Research Council of the National Academies, Dec. 2004*