February 9, 2015

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

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

Dear Directors Munoz, Rodriguez and Members of the Task Force on New Americans:

The Community College Consortium for Immigrant Education welcomes this opportunity to highlight several of its members’ promising practices and offer recommendations to the White House Task Force on New Americans as it develops a federal immigrant integration strategy.

CCCIE (www.cccie.org) is a national network of over 30 community colleges and other leading professional and research organizations committed to strengthening and expanding programs and services for immigrant students and leveraging the special role community colleges play in the immigrant integration and education ecosystem. The members of CCCIE believe that the effective education and training of immigrants is a key component—indeed, a necessity—for successful immigrant integration.

The programs and services CCCIE is interested in advancing span the skills continuum and mirror the varied needs that immigrant students have. These include English as a Second Language (ESL) instruction at all skill levels, college readiness, college completion, career readiness, and employment and advancement.

CCCIE, which is led and supported by Westchester Community College in Valhalla, NY, sees both challenges and opportunities associated with the successful integration of immigrants into American society. Challenges exist at both ends of the skills spectrum. While almost two-thirds of all jobs by 2020 will require at least some post-secondary education, many Limited English Proficient (LEP) adults will be ill equipped to fill those jobs. According to the Migration Policy Institute, over 8 million adults in 2012 were LEP and low-educated (lacking a high school diploma or equivalent). Among college-educated immigrants, about 1.6 million who earned their credentials abroad are either unemployed or working in low-
wage, low skill jobs. Many of them are scientists, engineers, and doctors unable to re-enter their careers or find alternative career pathways when they arrive in the U.S.

America’s community colleges play an integral role in the linguistic, civic, and economic integration of our nation’s immigrants and refugees with varying educational backgrounds. Community colleges offer a vast array of certificate and two-year degrees, career training and employer recognized credentials, ESL instruction, and civics education and citizenship preparation.

**Examples of CCCIE Members’ Success and Innovation**

Community colleges assist thousands of newly arrived refugees each year with intensive job related English language instruction, vocational training and employability skills. Some exemplary programs: Miami Dade College’s REVEST program (Refugee/Entrant Vocational Educational Services Training), FL, Pima Community College’s Refugee Education Project, AZ, Northern Virginia Community College’s Adult Career Pathways program, VA; and the Montgomery County Refugee Training Program at Montgomery College, MD.

Since 2005, Wilbur Wright College, IL and its partners have operated Carreras en Salud (Careers in Health). This career pathway program has helped low skilled, limited English proficient immigrants become bilingual and bicultural Certified Nurse Assistants and Licensed Practical Nurses, filling a much-needed health care services gap in Chicago.

As part of City Colleges of Chicago system-wide Reinvention initiative, the number of ABE/GED/ESL students who advance to college-level courses has increased by 200 percent. Each City College offers general education programs, including certificates and associate’s degrees, but each college also specializes in a College to Careers area that focuses on careers with the highest predicted growth over the next decade.

South Texas College offers 16 integrated career pathways with contextualized language and basic skills support leading to clearly defined stackable credentials, employment, and advanced learning opportunities for low-skill, low-literacy adults lacking English language skills and a high school diploma.

Alamo Community College District, TX, Bunker Hill Community College, MA; and LaGuardia Community College, NY are among several community colleges across the country that partner with the Welcome Back Initiative, a national program that helps internationally trained health care professionals rebuild their health care careers in the US.

Since the implementation of Deferred Action for Childhood Arrivals (DACA) in the summer of 2012, community colleges such as Palm Beach State College, FL; Bluegrass Community and Technical College, KY; Johnson County Community College, KS; Rio Hondo College, CA; and Westchester Community College, NY have played a pivotal role in ensuring access to higher education for these eligible youth and have served as resource and referral hubs, partnering with community organizations and agencies.
The Washington State Board for Community and Technical Colleges’ I-BEST model has been replicated throughout all 34 community colleges in Washington state and has greatly accelerated college completion and career readiness of community college students—immigrants and non-immigrants alike. WSBCTC has launched two major initiatives—High School 21+ and Integrated Digital English Acceleration (I-DEA) that serve as “on-ramps” to the I-BEST program and have significantly increased educational and workforce opportunities for immigrant students.

In San Mateo and Santa Clara counties (CA) ALLIES, a partnership of community colleges, adult education providers, community organizations, labor, business and public agencies works to increase the skills and credential attainment of the region’s limited English proficient jobseekers and to meet the skill needs of employers.

Five Key Drivers of Success

Based on interviews with representatives of our Blue Ribbon Panel, we have identified the following five key drivers of success at colleges that achieve exceptional outcomes for immigrant students:

1. Strong leadership and vision to build a culture of accountability and high performance.
2. Meeting the students where they are in their journey by setting clear pathways to credentials and other intentional structures to support them.
3. Intentionality and focus on continuous improvement processes for teaching and learning.
4. Integrated structures that link the college to the broader community for the benefit of students.
5. Consistent, systematic, and strategic use of data to improve practice.

CCCIE’s Promising Practices in 2015

CCCIE is delighted to share its most recent report Bridging the Gap for Foreign-Educated Immigrants: A Guide for Community Colleges, developed in partnership with World Education Services’ Global Talent Bridge. This is a “hands-on” tool that provides resources and best practices for counselors, administrators, and community partners to help them advise foreign-educated immigrants in navigating college programs.

With support from the Kresge Foundation, CCCIE’s work in 2015 will focus on firmly embedding our expertise in immigrant education issues into broader national college completion and workforce development initiatives. We are developing several new initiatives that will equip various stakeholders in their efforts to advance opportunities for immigrants, including a Data Metrics Working Group comprised of several CCCIE member colleges that have pushed forward in their own data collection and tracking activities. This group will help identify critical outcomes and related indicators for immigrant student success, determine benchmarks for student and program performance, and establish and share data collection and reporting best practices with a broad audience.
We are pleased to announce that CCCIE is partnering with the National Council for Workforce Education (NCWE) in organizing its annual 2015 conference, **Workforce Education for All!** in Portland, OR in October 2015, which will explore best practices to better integrate various underserved populations into the labor force, including immigrants, veterans, older adults, and others. CCCIE is developing a conference strand focused on immigrant students and workers and looks forward to exposing new audiences to immigrant education and workforce development issues. We are also providing technical expertise in a new pilot project, led by NCWE and funded by the Ford Foundation, designed to replicate and expand effective community college/worker center/CBO partnerships to address the workforce development needs of immigrants and immigrant workers.

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With immigration reform and labor force needs in the policy forefront, CCCIE and its members are poised to assist in immigrant integration and education efforts. In that spirit, we are happy to share the attached federal policy recommendations to advance educational and career opportunities for immigrants. Also attached is a list of our Blue Ribbon Panel colleges.

We look forward to further engaging with federal partners and members of the Task Force in helping to shape our nation’s federal immigrant integration strategy. Thank you for your efforts and national leadership on this critical initiative.

Sincerely,

Teresita B. Wisell
CCCIE Executive Director
VP, Continuing Education & Workforce Development,
Westchester Community College

Jill Casner-Lotto
CCCIE Director
CCCIE Blue Ribbon Panel Members:

Alamo Community College District, TX (includes 5 community colleges)
ALLIES (Alliance for Language Learners’ Integration, Education and Success), CA (includes 10 community colleges and over 40 adult education providers, employers, labor unions, public agencies, community groups, and economic development agencies)
American Association of Community Colleges, D.C
Bluegrass Community and Technical College, KY
Bunker Hill Community College, MA
City Colleges of Chicago, IL (includes 7 community colleges)
City College of San Francisco, CA
Johnson County Community College, KS
LaGuardia Community College, NY
Literacywork International, NM
Miami Dade College, FL
Migration Policy Institute, D.C.
Montgomery College, MD
National Community College Hispanic Council, CA
Northern Virginia Community College, VA
Palm Beach State College, FL
Pima Community College, AZ
Rio Hondo College, CA
South Texas College, TX
Washington State Board for Community and Technical Colleges, WA (includes 34 community colleges)
Westchester Community College, NY
World Education Services, NY
Recommendations to the White House Task Force on New Americans
February 2015

1. Immigrants, both low and high skilled, are not always explicitly referenced as eligible populations that could be served in federal grants, including discretionary grants.

   **Recommendation:**
   Explicitly include limited English proficient and immigrants—citing both high- and low-skilled— as discrete populations eligible for service under federal (DOE, DOL, HHS) discretionary grant programs. Require applicants to demonstrate equitable access and participation by immigrant, refugee, and English learner students.

2. Community colleges alone cannot adequately provide the comprehensive menu of services that immigrants require to enter and advance in the workforce. Partnerships with multiple entities are essential for advancing immigrants in the workplace. However, sustaining these partnerships through braided funding strategies requires knowledge of various public and private funding sources and assistance in navigating and leveraging multiple funding streams, including those at the federal level.

   **Recommendations:**
   Incentivize federal funding to promote and strengthen community college partnerships and networks supporting immigrants’ successful transitions across educational and training systems.
   Provide technical assistance at the federal level to help community colleges and local partners develop collaborative funding strategies that support both high and lower skilled immigrants.
   Use policy guidance, regulatory authority, and/or discretionary funding to support exemplary models.

3. The new Workforce Innovation and Opportunity Act (WIOA) provides opportunities for community colleges, adult education providers, CBOs, and employers to adopt or expand such best practices as career pathways; contextualized ABE, ESL, and occupational training; industry or sector partnerships; and attainment of employer-recognized credentials.

   **Recommendations:**
   Elevate and replicate existing best practices through federal avenues for dissemination and technical assistance, including webinars, conferences, and site visits.
   Ensure adequate funding is provided to support integrated career pathway programs for English language learners, particularly those at lower literacy levels.
Community College Consortium for Immigrant Education Recommendations

4. High skilled immigrants are often part of the low-wage population but are not recognized as such. There are models within the community college sector that serve these immigrants with accelerated English language instruction and “soft career skills”, providing quick re-entry into professional careers.

**Recommendation:**
Provide funding and technical assistance to community colleges and partners to develop approaches to address professional level English language learning needs of LEP individuals who possess high levels of education and training for high-demand professions.

5. A major factor in the implementation of effective ESL career pathway programs is access to financial aid for immigrant students, including those without a high school diploma. We strongly support the provisions enacted in the December 2014 federal spending bill that partially restore the Ability to Benefit option to students enrolled in college-level career pathway programs.

**Recommendation:**
While we appreciate the inclusion of the ATB provision recently enacted in the December 2014 spending bill given the increase in ESL integrated career pathways, we would recommend that ATB eligibility for Pell Grants be restored for all qualified students originally eligible under ATB and not limited to those enrolled in career pathway programs. In addition, we urge policymakers to provide additional clarification of what constitutes an eligible college-level career pathway and provide guidance to assist students and financial aid officers in demonstrating what programs would qualify under the new rules.

6. The President’s latest executive actions—including expansion of Deferred Action for Childhood Arrivals (DACA) and introduction of Deferred Action for Parental Accountability (DAPA)—present unique opportunities for community colleges, K-12 schools, and adult educators to partner by building a network of resources that inform undocumented students and their families of the educational and training opportunities available at their institutions and offering assistance in accessing systems at various entry and transfer points.

**Recommendations:**
Provide technical assistance to clarify how educators, school districts, and adult education providers can support immigrant youth and parents eligible for DACA and DAPA students given certain legal or policy restrictions.

Showcase best practices that utilize bridge programs or “on-ramps” as a way to transition DACA- and DAPA-eligible individuals into college career pathway programs.