



NATIONAL CENTER ON IMMIGRANT INTEGRATION POLICY

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 Ave, NW
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RE: Issue, Action and Data Inputs to Assist Creation of National Integration Plan

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

The Migration Policy Institute's (MPI) National Center on Immigrant Integration Policy commends President Obama for creating a White House Task Force on New Americans and setting into motion efforts seeking to develop "a coordinated Federal strategy to better integrate new Americans into communities and support State and local efforts to do the same." The President's charge to the Task Force to create the U.S. government's first Integration Plan after reviewing "policies and programs of all relevant executive departments and agencies to ensure they are responsive to the needs of new Americans and the receiving communities in which they reside" is truly groundbreaking.

At both the European Union level and in countries including Australia, Canada, Germany, the Netherlands, Portugal and Sweden MPI has successfully argued for and helped to guide implementation of similar "whole of government" efforts that seek to improve responses to local integration needs and opportunities created by federal immigration policies. We remain hopeful that the U.S. Congress will enact legislation soon to create a more permanent office within the Executive Office of the President for these purposes. In the meantime, however, we are confident that the President's and your critically important efforts will demonstrate the great value that results from better coordination of integration policy and program efforts across different agencies and levels of government, and from better alignment of national interests across the immigration and domestic policy arenas.

Outlined below is a series of issues and recommendations for the Task Force's consideration that is rooted in findings from our Center's broad-ranging integration research, data and policy analysis work. They touch on the mandates and concerns of a wide range of federal agencies and the domestic policy priorities of the Obama administration more generally in areas such as early childhood education and care, elementary and secondary education, health care, adult education and training, as well as housing, financial literacy and local economic development. In addition to issues and recommendations in important subfields such as these, we urge your consideration and adoption of two additional proposals in the Integration Plan you will submit to the President. These are:

1) Create an Integration Success Fund.

Federal Social Security taxes paid on earnings that cannot be connected with a valid Social Security number are placed in a “suspended earnings” file and simply sit on SSA’s balance sheet from decade to decade. These payments, reported to be largely attributable to payments made to fake social security numbers on behalf of unauthorized workers, were estimated by our Center to amount to close to \$60 billion as of November 2011. Given the net fiscal loss most state and local governments incur as a result of costs for services they provide to immigrants and refugees—particularly education and health services—we have suggested that the federal government should return some or all of the funds it has amassed from these Social Security payments to states and localities through the creation of an Integration Success Fund. Monies for the Integration Success Fund need not (perhaps could not) be directly withdrawn from the SSA and placed into the ISF; rather, the existence of the unused/unusable funds at SSA would be the justification for other federal funds to be assigned for ISF purposes.

The benefits of such a Fund are immediately apparent: in addition to helping right some of the fiscal inequities states and localities suffer in paying for integration services, it could provide much needed funding for strategic integration service or coordination initiatives—leveraging the strengths of a multitude of sectors and levels of government to accelerate the creation and adoption of more effective approaches to the linguistic, economic and civic integration of immigrants and refugees. However, a primary drawback to using suspended earnings as the “basis” for the ISF would be if doing so somehow led to unauthorized workers being unable to claim benefits sometime in the future based on prior contributions made on their behalf (they are currently unable to claim such benefits and many expect future immigration reform measures to continue to block their ability to do so). Nevertheless, even if in the future some immigrants were to be permitted to seek Social Security benefits for periods of unauthorized work, it is likely that a portion of the significant amount of suspense file contributions could never be matched with a legitimate recipient.

We urge the President to begin laying the groundwork for creation of such a Fund by forming a cross-agency working group charged with exploring options and providing recommendations for its creation and implementation by the end of this June. As part of this effort the SSA should be directed to estimate both the amount of contributions paid on behalf of unauthorized immigrant workers and the amount they estimate could realistically be connected to such claimants in the future. The working group should consider and make recommendations on the feasibility of other financing options for the Fund, such as a modest surcharge on USCIS service processing fees.

2) Develop an Integration Goals and Indicators Framework to Guide Ongoing Efforts.

MPI and our Center have often spoken about the necessity of creating “brain circuitry” for the federal government to understand and respond to the impacts of immigration policy via a White House Office on Immigrant Integration Policy (or, for New Americans). The workings of this Office as proposed in our prior writingsⁱ and for example in HR4949ⁱⁱ, are intended to allow the federal government to consult, coordinate and respond to integration challenges and opportunities both horizontally (across federal agencies) and vertically—in consultation with government, business and NGO stakeholders at the state and local levels.

Such “whole of government” approaches have been pioneered over the past several decades in countries including Canada, the U.K. and Australia to address inefficiencies and costs associated with the siloed nature of government policies and services. Generally speaking, they seek to improve outcomes of complex policy challenges by linking policy development and implementation across key issue areas, levels of government, and sectors.ⁱⁱⁱ Perhaps not surprisingly, research on these efforts has found that processes which allow for alignment of goals, targets, outcomes, and accountability are key elements in their success.^{iv}

Therefore, while the Task Force acts in the short term to compile the Integration Plan and meet other requirements contained in the Presidential Memorandum, we urge that it simultaneously work to develop a set of integration goals and indicators for each agency. These will provide both a critically needed framework for intra- and inter-agency efforts to close gaps in access, relevance and quality of services for newcomers, as well as an invaluable long-term investment in future White House Office or Task Force efforts to improve integration policy and program coordination. Inevitably, creation of this framework will raise questions regarding data capacity and relevance within and across agencies—for example, the funding and strategies of many federal programs are driven by indicators of poverty, which overlap with but do not fully describe indicators of integration needs or success. As the Task Force considers and takes steps to resolve these issues it should make recommendations and seek to advance priorities for federal research and data collection more generally—a starting point for which would be inclusion of parental place of birth in aggregate data sets such as the American Community Survey.

3) Expand Federal Leadership and Support for Language Access Services

Upholding central tenets of the Civil Rights Act of 1964, the federal government requires its state and local agency partners to ensure that meaningful access to federally-conducted and federally-funded programs and activities is not limited due to language barriers; many state and local governments have invested significant resources to meet the needs of their LEP clients and comply with both the letter and spirit of federal language access requirements. The Federal Coordination and Compliance Section within the Civil Rights Division of the Department of Justice provides guidance and informational resources for agencies related to their obligation to appropriately plan for and provide language access services. Since its founding our Center has provided a range of additional supports for state and local governments addressing cost-effective ways to develop and maintain high-quality language access services in a wide range of fields, including elementary and secondary education, workforce services, health and human services and law enforcement.

However, as the diversity of languages spoken by immigrant and particularly refugee populations has grown, the administrative complexity and expense of providing language access services, especially in the case of low incidence languages, have posed a significant challenge for many states and localities. The federal government should play an expanded leadership role in supporting state and local government partners as they seek to address language access needs created by federal immigration and refugee policies. The Task Force should create a cross-agency working group that interfaces with state and local governments and agency program leads to consider ways in which the federal government can begin to better support provision of language access services—for example, by helping to accelerate development and adoption of cost-saving technologies or leading efforts to aggregate service demand within or across service systems in order to obtain more favorable unit pricing.

In addition to the recommendations that follow, attached is a set of data sheets our Center compiled for key U.S. cities to help their leaders and the Task Force identify areas where a coordinated federal approach to immigrant and refugee integration has the opportunity to “close gaps” in linguistic and economic integration for immigrants, refugees and their children.

Lastly, we have sought to limit our recommendations to actions that are within the current powers of the President and federal agencies to act upon. However, as the new Congress begins its work no doubt there will be pieces of legislation proposed that have a bearing on prospects for effective integration of immigrants and refugees. Should the Task Force decide to evaluate and provide recommendations to the President on such measures we would be happy to provide data analysis, relevant findings from research, or other assistance the Task Force may find useful in this regard.

Thank you for taking the time to consider these materials; we would be happy to answer any questions you may have related to them.

Sincerely,



Margie McHugh, Director
MPI National Center on Immigrant Integration Policy

I. Adult Education and Training

Needs and Capacity Challenges

Adult education programs play a vital role in supporting the linguistic, economic, and civic integration of immigrants and refugees who are Limited English Proficient (LEP) or have low levels of education. Without building their English proficiency and basic skills, many immigrant and refugee adults remain trapped in jobs that do not pay a family sustaining wage and fail to exploit their talents and prior experience. Immigrants and refugees also need to build English language skills in order to successfully complete the U.S. naturalization process.

Largely as a result of federal immigration policies, the number of LEP adults in the United States has risen dramatically in recent decades, from 6.5 million in 1980 to 18.7 million in 2012.^v While LEP adults comprised 10 percent of the entire working-age population in 2012, they represented 35 percent of low-educated workers (those lacking a high school diploma or equivalent). Over 8 million adults were LEP and low-educated, indicating a significant need for programs that address both English language acquisition and basic educational attainment.^{vi}

Despite the substantial need for adult education programs for immigrants and refugees, these programs have reported precipitous declines in capacity in recent years due to budget cuts and closures. National enrollment in ESL programs funded via WIA Title II's federal-state partnership fell from 2.3 million in 2008-09 to 1.7 million in 2012-13 (a 35 percent decline).^{vii} Levels of overall funding for Title II programs has long been well below need, with annual funding sufficient to serve less than 5 percent of those who require services.^{viii} While LEP adults are over-represented among the low-skilled labor force, they represented just 3 percent of those receiving WIA Title I Intensive or Training Services in Program Year (PY) 2012.^{ix}

Given the vital importance of adult education and training services to the successful integration of immigrants and refugees, our Center has undertaken numerous research initiatives seeking to better understand the effectiveness and availability of these services in different parts of the U.S. and for newcomers with different education and skill profiles. Most recently our work has focused on the ability of DACA-DREAM youth to progress along education and career training pathways,^x as well as on the broader range of service quality, relevance and access challenges currently facing immigrant and refugee subgroups and diverse system service

providers.^{xi} The latter initiative included community consultation sessions in seven states at which data describing the education and training needs of local immigrant and refugee populations were studied and needed reforms to federal adult education and training policies and investments for immigrants and refugees were debated and compiled. Our issue analysis and recommendations to the Task Force draw from these recent efforts as well as our larger body of work in this arena.

Program and System Design Issues

Adult education programs are often disconnected from postsecondary education and workforce training, due to the “siloes” nature of system designs and funding streams. LEP adults are often required to progress through multiple levels of ESL instruction before attempting ABE or ASE courses, which are themselves pre-requisites for career training courses. While strong examples of integrated basic education and skills training models and bridge programs have emerged in recent years, these program options remain limited in scope. Lower-educated, LEP immigrants and refugees may have difficulty accessing these programs, as they are generally designed for adult learners with at least intermediate levels of English proficiency and basic skills.

In addition, over the past several years, federal and state adult education policies have increasingly emphasized the goal of transitioning adult learners into postsecondary education and training through a career pathways approach. While this orientation toward postsecondary degrees and certificates has the potential to substantially improve the academic and workforce outcomes of students at the higher levels of the adult education spectrum, these reform efforts may inadvertently place program services beyond the reach of immigrant and refugee adults with low levels of education and English proficiency. Without accountability designs that ensure equitable inclusion of these populations through research-supported instructional models, measures that privilege the completion of high school equivalency (HSE) diplomas, postsecondary transition, and employment could create a disincentive for serving those most in need of education and training services. This type of “creaming effect” was a common criticism of the design of WIA Title I’s performance measures, which may have contributed to the low numbers of LEP workers served through occupational training programs.^{xii}

In an attempt to address this issue, WIOA allows state and local performance levels to be adjusted based on participants’ underlying education, work experience and language proficiency. It remains to be seen whether regulations for the implementation of WIOA will ensure these adjustments effectively address the needs of adults with the lowest levels of English proficiency and underlying education.

Turning to the needs of individuals eligible for protections under the Deferred Action for Childhood Arrivals (DACA) program, occupational training programs need guidance on the rights of and opportunities available to individuals who have been granted deferred action and temporary work authorization. A lack of understanding of federal regulations on the part of providers appears to have prevented eligible individuals from accessing workforce training services. Training programs may be unaware of the Department of Labor’s July 2014 Training and Employment Guidance Letter (TEGL)^{xiii} clarifying that DACA grantees are eligible for WIOA Title I and Wagner-Peyser Act Programs.

In addition, Basic Education in the Native Language (BENL) and Spanish-language high school equivalency programs can provide a faster and more cost-effective pathway to a diploma, postsecondary education, and career advancement for potentially-eligible DACA youth who are LEP and have low underlying levels of education. However, federal adult education funds reportedly cannot be used to support such instruction.

At the other end of the basic skills spectrum, current service delivery systems are often poorly designed to meet the needs of upper-level ESL students, as well as highly-educated immigrants and refugees who are LEP and may have gaps in their professional education or training. Higher-level ESL classes are generally not available, with the result that many of these individuals are placed in costly developmental education classes that don't meet their needs and/or they may be expected to unnecessarily repeat years of professional training. The lack of better tailored education and training options, as well as a lack of guidance in navigating professional licensing and credential recognition processes, causes many highly-skilled immigrants and refugees to languish in low-skill, low-wage jobs.^{xiv} Their wasted talent represents an untapped resource that could fuel local and regional economic growth.

Unique Issues Facing Refugees

Refugees, in particular, may have pronounced gaps in their underlying education and skills, but refugee resettlement policies prioritize a quick transition into employment—most often in low-wage jobs—rather than supporting the education and training needed for long-term integration and economic advancement. Taking advantage of WIOA Title I and II programs can be especially challenging for refugees, due to the tight timeframe required for refugees to obtain full-time jobs and become financially self-sufficient as well as the lack of available program slots in most cities.

Recommendations: Adult Education and Training

- 1) The Departments of Labor and Education should ensure that the unique needs of low-skilled and/or LEP immigrant and refugee adults are holistically addressed in regulations for the implementation of WIOA. All stakeholder outreach regarding the development of these regulations should include providers that have substantial experience serving immigrant and refugee populations and all state and local program planning and design efforts should be required to include population data containing cross tabulations of English proficiency and level of educational attainment. In addition, the Departments of Labor and Education should ensure that the design of WIOA performance and accountability measures does not have the effect of penalizing programs for serving adults with low levels of English proficiency and underlying levels of education, but rather provides incentives for implementing research-supported models for building the skills of this population.
- 2) The Department of Justice should review the design of the WIOA Title I occupational training system to determine if the barriers to enrollment facing individuals who are LEP and/or lower educated constitute a violation of their civil rights. The impact of the new WIOA legislation on the ability of low-educated and LEP immigrants and refugees to access training services should also be explicitly monitored. States and localities should be expected to provide equitable access to training programs for lower-skilled adults. Building on the work experience that many immigrants and refugees already have (e.g. in construction, automotive, child care), models that could be supported and expanded include ELA contextualized to growing career sectors, bilingual vocational programs, and integrated training using competency-based models of varying lengths.
- 3) As part of the national leadership activities funded under WIOA, the Department of Education should create a grant program to assist states and local/regional systems that are using evidence-based plans and/or innovative models to accelerate learning outcomes for individuals with the lowest skill levels. Grants should provide incentives for programs that target harder-to-serve populations, including lower-skilled immigrants and refugees as well as adults with the lowest levels of English proficiency, and develop on-ramps to career pathways for these groups.

- 4) The Departments of Labor and Education should provide technical assistance and heighten visibility of the TEGL clarifying DACA grantees' eligibility for WIOA-funded occupational training programs so that eligible individuals are not improperly denied services.
- 5) Concurrent with the implementation of DAPA, a new TEGL should be issued regarding the eligibility of DAPA grantees for WIOA-funded occupational training programs.
- 6) National and state WIOA leadership funds should also support investments to better meet the needs of upper-level ESL students and high-skilled immigrants and refugees, including through alignment between adult education and postsecondary education systems, along with career transition and credential recognition services for foreign-trained individuals. As part of these efforts the Departments of Education, Health and Human Services and Labor should undertake coordinated pilot and demonstration projects focused on approaches that effectively support foreign-educated immigrants and refugees in re-entering the field (or a related field) for which they have trained. These efforts should include development of distance learning models for acquisition of professional-level English language and literacy skills contextualized for a variety of occupations.
- 7) The Departments of Education, Health and Human Services and Labor—along with their counterparts in state and local government—should create a mechanism within the Interagency Working Group on Career Pathways to study and devise solutions for meeting the needs of key subgroups of immigrants and refugees for adult education and training services. This effort should address, in particular, inequities in access by low-educated and/or LEP immigrants and refugees to accelerated basic education, workforce training and career pathway programs. Among other initiatives, the group should consider ways to maximize the use of CTE program facilities for evening and weekend classes for adults, and harness the potential of experimental design sites to meet the needs of key immigrant subgroups such as highly-educated immigrants who are LEP or who have gaps in their education or training.
- 8) The Departments of Education and Labor should provide explicit support and guidance for workforce development boards, governors, and state agencies responsible for developing state plans on balancing WIOA's demands for postsecondary transitions and employment outcomes with the requirement to expand access to employment, training, education and support services for individuals with barriers to employment, including low levels of literacy and English proficiency.
- 9) The President should double the amount of funds available under AEFLA in order to begin to address the severe lack of capacity in adult education and training services for immigrants and refugees and to accelerate the adoption of effective integrated education and training program models. These new funds should be distributed via competitive processes, with all or a significant portion dedicated for purposes of braiding resources with programs operated by the Departments of Labor, Health and Human Services, and Housing and Urban Development to support the economic and linguistic integration of immigrants and refugees.
- 10) Given the several billion hours of unmet ESOL instruction need for immigrants and refugees^{xv}, all relevant federal agencies must help programs to harness the power of technology to better meet newcomers' language and training needs. The Departments of Education and Labor should lead these efforts by creating frameworks for the effective use of technology for education and training. These efforts should include support for blended learning models that integrate face-to-face instruction with independent learning for lower-skilled immigrants and refugees who are relatively new to technology. Such models should integrate the use of multi-media, including video, to illustrate job training concepts and procedures appropriate for adults who are not yet proficient in English. A competitive priority could be provided for such efforts under the additional AEFLA funding discussed above; incentives and/or a focus on such approaches could also be woven into most other recommendations in this section.
- 11) The State Department, in consultation with the Departments of Education, Labor and Homeland Security, should create processes to assess refugees' levels of education, native and English language and literacy skills, and advanced training and/or work experience prior to resettlement. This assessment

should be shared with resettlement agencies and relevant state and local government entities prior to refugees' arrival in the U.S., and used to estimate and plan for provision of adult language, basic education, secondary education, workforce skills and/or postsecondary education services needed for refugee adults to reach the "tipping point" (one year of post-secondary education) in skills required to gain employment that pays a family-sustaining wage. In the case of highly-educated refugees, it should be used to estimate and plan for provision of education and training services that will allow them to re-enter their profession (or a related field) in the U.S.

- 12) The State Department and/or Health and Human Services should provide reimbursement or direct funding for integrated adult basic education, workforce training and career navigation and pathway supports required to assist refugees in reaching the "tipping point" of basic skills and training required for employment that pays a family-sustaining wage or career re-entry for those who are highly educated. Training and support for refugee caseworkers should be included in this approach to allow them to assist in stabilizing families in crisis and promote persistence and success of those enrolled in education and training programs.

II. Early Childhood Education and Care (ECEC)

Approximately 5.8 million children ages 5 and under have at least one immigrant parent, accounting for 25 percent of all young children in the U.S.^{xvi} Young children of immigrants now make up a significant share of the population across all 50 states, comprising more than 20 percent of the young child population in 19 states.^{xvii} Exhaustive research documents the importance of high-quality early childhood programming to future academic, economic, and social outcomes, and children of immigrants, particularly those who speak a language other than English in their homes, especially stand to benefit from high-quality early learning experiences. However, immigrant children are enrolling in pre-kindergarten programs at lower rates than their native peers, and research suggests that an achievement gap between children of immigrants and native children often begins even prior to kindergarten entry. Data systems and collection at the state and federal levels for children in the birth to 5 years remain largely unaligned across programs and do not include important information regarding young children's Dual Language Learner (DLL) status and home language, obscuring these critical issues from view for many programs and administrators.

Parent Engagement

The foreign-born parents of young children, who make up 21 percent of parents of young children overall in the U.S., face many challenges that may impede their access to and meaningful participation in family engagement activities in their children's early years. Yet research clearly supports the positive impact of strong partnerships between families and early childhood programs, which lead to future academic success and increased socio-emotional skills for young children. Forty-five percent of these parents are low-income, and 47 percent are Limited English Proficient. Moreover, immigrant and refugee parents are more than twice as likely as native-born parents to be low-educated, comprising 45 percent of all U.S. parents of young children who lack a high school credential. This represents a significant risk factor for many young children of immigrants.

Many ECEC programs face difficulties engaging with immigrant and refugee parents who often require support building U.S. cultural and systems knowledge and in overcoming English language and literacy barriers. These difficulties have been exacerbated in recent years as adult basic education and English instruction programs have been significantly reduced and services that remain are increasingly focused on high school dropout recovery and post-secondary transition. The evolution of the adult education system in this direction, along with loss of enrollment capacity, has left Head Start and other early childhood programs without partners in

addressing the language and literacy development needs of parents who need these skills in order to navigate information and programs on their children’s behalf.^{xviii} Meanwhile, a dearth of cultural and linguistic competence within the ECEC workforce contributes to barriers in meaningful communication with parents that would allow them to act as full partners in their young children’s development and education.

Building a Linguistically and Culturally Competent Workforce

The ECEC field in the U.S. currently employs 5.8 million immigrant workers—this number doubled in the last 20 years and comprises 18 percent of the total ECEC workforce.^{xix} While on the surface, the ethnic, racial and linguistic diversity of the workforce mirrors that of the young children it serves, this diversity and the majority of immigrant staff are concentrated in sectors of the workforce that require lower levels of education and formal qualifications. This, coupled with the fact that native ECEC workers are almost twice as likely as immigrant workers to be in leadership positions as preschool teachers and program directors^{xx}, indicates that immigrant workers appear to face high barriers to advancement in the field. Furthermore, 22 percent of immigrant ECEC workers live under the poverty line.^{xxi}

The linguistic and cultural competence that this large and growing group of immigrant and refugee workers brings to the ECEC field will become increasingly important to delivery of high-quality early childhood services as the number and share of young children of immigrants continues to grow across the country. Meanwhile, an increasing number of states, as well as the Head Start Bureau at the federal level, have been calling for higher professional standards for ECEC workers, including stricter education requirements. As licensing and credentialing standards continue to rise, the needs of low-educated and LEP workers will need to be carefully considered in the planning and design of career lattices and professional development systems in order to retain the critical skills and competencies that they bring to the field and the children they serve.

Recommendations: Early Childhood Education and Care

- 1) Require and support data collection regarding young children’s Dual Language Learner (DLL) status and home language information, which can inform federal, state and city level ECEC policies to integrate the needs of diverse learners in their program provision. As part of this effort, promote language screening of first and second languages and culturally and linguistically appropriate developmental and behavioral screenings as part of an aligned birth to 5 system through collaboration and integration with key partners across programs within HHS and the Department of Education. Collection and sharing of DLL status and home language information by 0-3 programs would provide data critical to allowing ECEC and Kindergarten-3rd programs to know they are serving young DLLs and in turn enable policymakers and program administrators to support more rigorous, aligned and effective approaches to serving them.
- 2) Launch a new technical assistance initiative for Head Start programs aimed at enhancing the collection and use of demographic data for local needs assessments and creating comprehensive program plans to serve the needs of DLLs. The program plans should include: tracking impact, improving outreach and developing selection criteria that ensures new populations are enrolled in Head Start programs, recruitment of culturally and linguistically diverse staff, implementation of English language development models, and development of culturally responsive family engagement strategies.
- 3) As additional federal investments in early childhood move forward, a compliance review of current policies, practices, and gaps in data collection by the Department of Health and Human Services’ Office for Civil Rights should be conducted to ensure that children of immigrants and DLLs are being equitably served across available public ECEC programming, particularly the child care subsidy program. Few if any states have taken specific action under the Early Learning Challenge, for instance, to address the needs

of DLLs. Future federal funding opportunities such as the upcoming Pre-K Development Grants should require specific accountability for serving DLLs beyond inclusion as a competitive priority to ensure improved outcomes.

- 4) Establish a large-scale pilot program jointly funded and administered by the Departments of Health and Human Services and Education to serve low-literate and LEP parents of young children and address unique needs at the convergence of the early childhood and adult education fields. The program should allow a variety of promising approaches at the state and local levels to expand and be studied, building knowledge and momentum for effective and scalable approaches. Measures and outcomes for such a program could include (a) increases in parent skill, (b) support for young children's healthy cognitive, dual language, and socio-emotional development, (c) knowledge on how to navigate the U.S. education system, (d) English language and digital literacy, and (e) creation of a personal education/training plan.
- 5) As the President's 2016 Budget calls for increased investment in ESEA's Title I, strengthen incentives and accountability for program funds allotted under parent engagement provisions by requiring schools and districts to take into account key demographic characteristics of parents and use strategies that address parents' cultural and functional literacy needs.
- 6) Create an interagency working group to address gaps in training and linguistic and cultural competence in the ECEC workforce, aimed at meeting the recruitment and retention demands created by program expansion while considering demographic data on the changing young child population and their learning and development needs. This initiative, jointly undertaken by the Departments of Labor, Education, and Health and Human Services, should address in particular the lack of adult education and training career pathway programs that address the needs of lower-educated and LEP ECEC workers as well as the need for a "Welcome Back" model for ECEC workers who obtained college degrees abroad and require accelerated, contextualized ESOL opportunities and processes to recognize their prior education and training. The working group would make concrete recommendations for the development of new career ladder and alternative pathways programs and the resource needs to meet the new demands for bilingual and bicultural, highly qualified ECEC professionals.

III. Financial Literacy

The degree of economic integration among U.S. immigrants and refugees varies widely, with some groups faring better than the U.S. born and others faring much worse.^{xxii} For many new Americans, financial literacy is an essential foundation for making one's way to financial security and employment that pays a family-sustaining wage. While financial literacy products and programs targeted to immigrants and refugees exist, their reach is limited and multiple barriers remain that make it difficult for immigrants and refugees to navigate services and resources that could assist their economic integration and advancement.

Federal efforts relevant to general needs in this area are undertaken by the Financial Literacy and Education Commission which was created by Congress in 2003 through the Financial Literacy and Education Improvement Act (Title V of the Fair and Accurate Credit Transactions Act). Congress designated the Treasury Department's Office of Financial Education to lend its expertise and provide primary support to the Commission, which is chaired by the Secretary of the Treasury. In 2011 the Commission released its National Strategy for Financial Education, a framework that continues to shape federal efforts and partnerships in the financial literacy arena

Other relevant federal efforts include the Money Smart program, a financial education curriculum created by the Federal Deposit Insurance Corporation (FDIC) to help low- and moderate-income individuals outside the financial mainstream enhance their financial skills and create positive banking relationships. Money Smart has several components within its programming: Money Smart for Adults; Money Smart for Youth; Money Smart for

Older Adults; and Money Smart for Small Businesses. According to the FDIC, Money Smart has reached over 2.75 million consumers since 2001 and is available in seven languages.

In addition to the Financial Literacy and Education Commission and Money Smart, President Obama created the President's Advisory Council on Financial Capability on January 29, 2010 through an executive order. The goal of the executive order is to assist Americans in understanding financial matters and making informed financial decisions in order to build a more vibrant, informed citizenry.

Despite these efforts, many immigrants and refugees remain "unbanked." According to recent findings by the Alliance for Stabilizing Our Communities (ASOC), 21 percent of Hispanics and 7 percent of Asian Americans and Pacific Islanders (AAPIs) do not have a bank account and lack resources to help them acquire financial knowledge, thereby increasing the likelihood of financial exploitation in the form of predatory products.

Other barriers to financial literacy include a lack of affordable and accessible financial services as well as evidentiary issues, e.g., questions about the documentation necessary to open an account with a financial institution.

Recommendations: Financial Literacy

- 1) The Treasury and FDIC should evaluate the extent to which federal financial programs are successful in reaching and addressing the needs of immigrants and refugees and determine ways to better meet the needs of newcomer populations whether through new approaches or more effective promotion of existing resources to immigrant and refugee communities.
- 2) FDIC should partner with community-based financial education programs in order to further leverage its Money Smart program and provide information to new Americans on reputable financial education programs available to address their needs.
- 3) The Office of Public Engagement/Intergovernmental Affairs Office and the Treasury Department should jointly examine financial education needs in top states with the highest number, share and growth of foreign-born individuals, and create and implement an action plan to support financial literacy among these newcomers. As part of these efforts, the Office of Public Engagement/Intergovernmental Affairs Office and Treasury could partner with the DollarWise Campaign, which works with mayors and cities to support the goals and objectives of the National Strategy for Financial Education.

IV. Health Care

Many non-citizen immigrants struggle to access affordable, quality health care services due to rules that bar them from federally-funded healthcare, recent reductions in funding for safety net programs, and a frequent lack of linguistic and cultural competency among providers. Furthermore, provisions in the Affordable Care Act (ACA) that divert funding from safety net programs while barring unauthorized immigrants and those granted relief under the new executive action programs from participation in healthcare marketplaces force states and municipalities to bear the financial burden of providing healthcare for millions of immigrants and their children.

Immigrants are far more likely than native-born individuals to lack health insurance. A 2013 MPI report found that 44 percent of all noncitizen immigrants do not have health insurance, compared with just 13 percent of native-born citizens.^{xxiii} Immigrants are less likely to receive coverage through their employers, with a large percentage working in construction, service industries, agriculture and small business, where employers are less

likely to offer health insurance.^{xxiv} In many cases, immigrants are also explicitly barred from accessing other affordable health care options due to federal laws and policies—neither undocumented immigrants nor DACA recipients are eligible for coverage under the ACA or federal Medicaid and CHIP, and often even immigrants who are eligible for Medicaid and CHIP must wait years before they are able to access these benefits.

As a result, many immigrant families rely on safety net providers such as public hospitals and community health clinics that serve low-income and uninsured patients. However, financing of the ACA depends on increasingly diverting funds from key safety net programs under the assumption that patients will be able to access federally-subsidized health care through the ACA insurance marketplace. This leaves states and localities without critically-needed reimbursements for the safety net clinics and hospitals that continue to serve the millions of unauthorized immigrants and recipients of deferred action who are excluded from ACA coverage.

In addition, accessing culturally and linguistically competent care can prove challenging for immigrants regardless of their health care coverage and legal status. While health care providers are required by law to offer language assistance for LEP patients, health insurance does not always cover these services, making it less likely that clinics and hospitals will pay for high-quality interpreters, language lines, or translation services. Finally, there is no unified system for training and certifying medical interpreters and/or translators, creating confusion among providers seeking to hire qualified personnel.

Recommendations: Health Care

- 1) HHS and the White House should engage in a regular dialogue with cities and states that are abiding by the strictures of the ACA but nevertheless seek to expand health coverage for more of their residents, primarily through use of state and local funds. Such a venue would allow for review of unclear or unnecessary federal regulations that impede innovative local approaches to expand health coverage for needy populations.
- 2) With regard to language access in health care settings: at the same time that federal requirements for language access have resulted in creation of a wide array of approaches and certifications, lack of federal leadership in this arena has left many providers uncertain as to which approaches are most effective or acceptable in meeting federal requirements and therefore worthy of adoption or scaling. HHS should provide national leadership on issues related to effective modalities for providing translation and interpretation services and/or for training and credentialing of individuals providing such services in health care settings.

V. Housing

The ability to obtain safe, decent, and affordable housing has been found to influence many important aspects of an individual's life, including access to employment and educational opportunities, familial and cultural networks, and commercial and government services. Many immigrants and refugees face significant hurdles in obtaining safe, decent, affordable housing despite federal protections that prohibit discrimination in the sale, rental, and financing of dwellings.

Since the late 1960s, the Department of Housing and Urban Development has sought to expand affordable housing, make home ownership more affordable, and take steps to strengthen urban communities more generally through a range of housing and community development strategies. HUD's policies and programs in the areas of publicly supported housing, enforcement of fair housing laws, and funding of community development efforts often intersect with the integration needs of immigrant and refugee communities. Through

the Community Development Block Grant (CDBG) program for example, HUD provides federal funds for community development activities that are intended to meet the needs of low- and moderate-income groups.

Most recently, HUD has published a proposed rule that is intended to renew focus on the longstanding obligation to affirmatively further fair housing (AFFH); it also seeks to provide each program participant with nationally uniform local and regional data on a variety of fair housing factors (e.g., patterns of integration and segregation) in addition to a Fair Housing Assessment Tool.

Recommendations: Housing

- 1) Issue a finalized AFFH rule as soon as practicable.
- 2) As HUD implements its AFFH regulations, it should monitor and enforce grantees' jurisdiction-wide affirmative fair housing obligations through the new Assessment of Fair Housing (AFH) process that includes: (1) clearly stated metrics (e.g., language barriers and cultural differences) for the assessment of fair housing impediments and actions to overcome them; (2) explicit guidelines for data collection and analysis by HUD and its grantees; (3) a modernized mechanism for public input (e.g., online complaint process); and (4) a meaningful system of pre- and post-award review.
- 3) Given the vital role that community input will play in the implementation of the AFFH rule, HUD must ensure that the community participation process is accessible to persons with LEP. A commitment to meaningful language access in this process includes, but is not limited to, providing translations of important documents related to the AFH process—as well as ensuring interpretation assistance is provided at public meetings regarding this process—in accordance with Title VI and HUD's 2007 LEP Guidance, 72 Fed. Reg. 2,732 (Jan. 22, 2007). Furthermore, HUD funding recipients must ensure that information regarding regional and local data is disseminated in multiple languages to a diverse set of stakeholders. Outreach about the AFH process should be conducted in multiple languages in various media platforms (particularly non-English media) to ensure LEP community members have a meaningful opportunity to engage.
- 4) Moreover, in addition to the AFH process, the Department should require funding recipients to conduct and submit periodic assessments of the fair housing and other federally-protected equal opportunity impacts of specific programs and activities undertaken with federal funds.
- 5) HUD should complement its submission requirements (see previous recommendation) and technical assistance to funding recipients with a rigorous system of periodic, unannounced audits of a subset of applicants and recipients chosen through random selection and random factors.

VI. Issues at the Intersection of Education, Training and Immigration Policy

Immigrant youth who are potentially eligible for DACA—as well as immigrant parents who are potentially eligible for DAPA—need access to trustworthy sources of information on these programs. Educational institutions are well-positioned to reach a broad segment of this population, yet educators and school/district administrators may be unaware of the relevant components and eligibility requirements of DACA and DAPA and lack the technical knowledge to inform immigrant students and families about these opportunities. Some K-12 school administrators are reluctant to engage in activities or information dissemination related to DACA or DAPA, citing concerns regarding the legal restriction on asking for students' immigration status or otherwise engaging in practices that could have a chilling effect on the enrollment of unauthorized immigrant students.^{xxv}

DACA applicants also need the assistance of K-12 schools and adult education programs to obtain the evidentiary documents (e.g. transcripts, diplomas, "letters of attendance") needed to demonstrate that they

meet DACA's education requirements. However, school districts' transcript request processes can be confusing or inaccessible for immigrant students and families and adult education providers may be unfamiliar with the Letters of Attendance needed for DACA applicants to demonstrate that they are attending a qualified program. Recent MPI field research found that some adult education providers implemented their own requirements for students seeking Letters of Attendance—including a minimum number of hours of attendance or a minimum score on a high school equivalency pre-test—while such metrics were never required by USCIS.^{xxvi} Our research also found evidence of remaining confusion in the adult education field on whether ESL courses meet DACA's requirements—despite USCIS guidelines issued on June 5, 2014 that aimed to clarify this issue. Additionally, legal service and outreach providers often lack the capacity to assess the education and training needs of their clients and provide referrals to appropriate programs that satisfy DACA's requirements and allow applicants to further their education and career goals. There is a critical lack of navigation assistance for individuals who would be eligible for DACA but lack the requisite educational attainment or enrollment.

In a few states with large DACA populations—Arizona and Georgia—unauthorized immigrants are barred from enrolling in publicly-funded adult education courses. This prohibition creates an additional challenge for potentially DACA-eligible individuals who live in these states and would need to enroll in a program of “demonstrated effectiveness” in order to qualify for deferred action. Interviewees in these states reported long waiting lists for enrollment in the few nonprofit adult education programs that do not require students to have legal status, as well as high tuition fees in some GED programs.^{xxvii} After receiving deferred action, many individuals continue to face substantial barriers to completing the level of education needed to secure jobs paying a family-sustaining wage. Chief among these challenges is the cost of postsecondary education and DACA recipients' ineligibility for federal financial aid or loans.

Little federal guidance exists for postsecondary education institutions or occupational training providers regarding the rights of and opportunities available to individuals who have been granted deferred action. In the occupational training system, a lack of understanding of federal regulations can prevent eligible individuals from accessing services. Providers may be unaware of the Department of Labor's July 2014 Training and Employment Guidance Letter (TEGL)^{xxviii} clarifying that DACA grantees are eligible for WIOA Title I and Wagner-Peyser Act Programs.

Recommendations: Issues at the Intersection of Education, Training and Immigration Policy

- 1) Establish an interagency working group on Issues at the Intersection of Education, Training, and Immigration Policy, to be co-led by the Departments of Education, Labor, and Homeland Security. The goals of this group would be to: (a) heighten educational institutions' awareness of the education requirements included in current immigration policies (including the DACA program); (b) build the capacity of educational institutions to assist immigrant students and parents in obtaining the evidentiary documents needed to apply for deferred action; (c) expand opportunities and improve education and training outcomes for deferred action recipients; and (d) maintain an interagency dialogue on the implications of current and future immigration policies for educational institutions at all levels.

To fulfill these goals, this group should:

- Issue joint guidance from the Departments of Justice and Education on the ways in which K-12 schools can play a role in DACA/DAPA outreach without running afoul of *Plyler* restrictions.
- Engage state education agencies, state higher education systems, state adult education directors, and state and local workforce investment boards in high-level training and technical assistance on issues related to the DACA/DAPA application process and the rights of deferred action recipients.

- Provide technical assistance and heighten visibility of the TEGL clarifying DACA grantees’ eligibility for WIOA-funded occupational training programs so that eligible individuals are not improperly denied services.
 - Following the implementation of DAPA, issue a new TEGL regarding the eligibility of DAPA grantees for WIOA-funded occupational training programs.
 - Provide additional guidance on the types of documents necessary for proof of enrollment in qualifying adult education programs; provide technical assistance and further clarification for networks of adult education providers on their role in providing Letters of Attendance for DACA applicants.
 - Use the existing structures of the WHIEEH and WHIAAPI to build visibility of issues at the intersection of education, training, and immigration policy, and provide technical assistance using materials already available on the Department of Education website.
 - Review the legality of restrictions on adult education classes in certain states and take action to address the disenfranchisement of potentially DACA-eligible individuals in states that bar access to adult education courses based on immigration status (i.e. Arizona and Georgia).
- 2) Many adult education policymakers and providers have reported to us that the federal government prohibits states from using federal adult education funds for native language basic education and HSE instruction; however, there does not appear to be language in the AEFLA or official federal guidance that bars the use of funds for these purposes. Given that such programs can accelerate the progress of many immigrants towards an HSE and onwards to post-secondary training and upward economic mobility, the Department of Education should review the basis and clarity of regulations regarding allowable uses of federal adult education funds for native language basic education and HSE instruction, and seek means to expand effective programming using this instructional approach.
 - 3) Establish a demonstration program focused on developing effective and scalable models for using technology to support adult instruction that meets a full range of new Americans’ linguistic, economic and civic integration needs. Such models will be especially critical in the event of future immigration reform legislation that may require a minimum level of English proficiency as a condition for permanent legal status. Under current conditions the default approach for most systems would be to provide traditional, leveled ESL classes that would generally fail to leverage the promise and imperative of helping immigrants cross the digital divide and access learning opportunities to advance their linguistic, economic and civic integration beyond the 100-200 hours they are likely to attend classes. Creating more of a marketplace for blended models that address a wide range of immigrant learners’ needs and goals will both help to boost a range of important integration indicators and help to reduce longer-term demands on already-overburdened adult education programs. Integration Success Fund resources could be used for a major investment of this nature.

VII. K-12 Education

The educational attainment of immigrant and refugee youth lags behind their U.S.-born peers. Twenty-six percent of first generation (foreign-born) young adults ages 21-26—and 40 percent of first generation Hispanics in this age bracket—lack a high school diploma or equivalent, compared to 10 percent of all young adults.^{xxix} While recent MPI research has examined the distinct educational barriers facing diverse subgroups of first and second generation youth^{xxx}—including long-term ELLs, who are often U.S.-born—our discussion in this section focuses primarily on the integration needs of first generation students, as they are particularly relevant to the efforts of the Task Force on New Americans.

Immigrant and refugee students often arrive in the secondary grades; they therefore may face challenges in filling gaps in their underlying education and developing sufficient academic literacy in English to meet high school graduation requirements. Some are students with interrupted formal education (SIFE). As a result, newcomers often require specially-designed instructional programs during their transition to U.S. schools, as well as academic enrichment, language acquisition assistance, expanded learning opportunities, and other support services to assist them in successfully completing high school and/or transitioning to postsecondary education.

Many immigrant and refugee newcomers have also experienced trauma and violence in their home country and in the migration process. They often may have a variety of urgent mental and physical health and safety needs that must be met to support their educational persistence and success. Schools are also often called on to meet a wide range of nonacademic needs for recently arrived students and their families, with insufficient federal funding to support these services.

Accountability and Funding

NCLB's passage represented a watershed moment for ELL education, as it brought the achievement gaps between ELLs and their English proficient peers into the spotlight. Recent MPI fieldwork interviews with educators and administrators in several states have affirmed the role of NCLB's subgroup accountability provisions in driving stronger state and district commitments to ELL outcomes.^{xxxii} Department of Justice investigations related to civil rights issues for ELL students in several major districts have underscored the importance of providing high-quality instructional programs for this group and ensuring equitable access to college- and career-ready content. Interviewees reported that, in some districts, judicial oversight has also elevated the prominence of ELL-related reforms and professional development initiatives.^{xxxiii} Most recently, the Dear Colleague Letter (DCL) issued by the Departments of Justice and Education on English Learner Students and Limited English Proficient Parents (January 7, 2015)^{xxxiii} provides joint guidance to assist states, school districts, and public schools in meeting their obligations to EL students and LEP parents and guardians under civil rights laws and discusses common compliance issues that frequently arise in OCR and DOJ investigations.

Under NCLB, states receive Title III allocations based on their total enrollment of ELLs (80 percent) and immigrant students who have first enrolled in U.S. schools in the last three years (20 percent). However, the reporting and accountability framework of NCLB is based on the performance of ELLs, rather than immigrants per se. NCLB also requires states to set aside a portion of their Title III funds for local education agencies with a significant increase in immigrant children and youth over the past two years—but there is wide variation across states in the portion of funds that are reserved for this purpose, as well as the way in which states define a “significant increase.” There is a need for greater research and information dissemination on the ways in which states and districts are using federal funds intended to support the specific needs of new immigrants—who may or may not be ELLs. Apart from NCLB, federal funds for the education of immigrant and refugee youth are extremely limited. The Office of Refugee Resettlement's Refugee discretionary School Impact Grant program is funded at only \$15 million annually and there is not a specific federal funding stream or grant program for states or districts serving Unaccompanied Child Migrants.

Schools are held accountable for the graduation rates of all students, but little support is available to meet the more intensive needs of immigrant and refugee students who arrive in the secondary grades and may not be on track to graduate with peers of the same age. As a result, some schools are reluctant to enroll these youth and may attempt to refer them to adult education or community college programs.^{xxxiv} Little federal guidance exists on how schools and districts can address the practical challenge of addressing significant gaps in prior schooling

while also building students' English proficiency and teaching grade-level academic content in four years, especially given limited state and local resources for summer and afterschool programs.

Immigrant and Refugee Parents

Immigrant and refugee parents who are LEP—and may have limited literacy in their native language—need access to interpretation and translation services to be able to understand and meaningfully support their child's education. In the absence of translated materials or trained interpreters, some schools and districts continue to rely on children, family members, or untrained bilingual staff members to facilitate communication with LEP parents. The DCL also provides guidance for states and school districts on their legal obligations to provide language access services to LEP parents and guardians, but there is a remaining need for technical assistance and oversight to ensure that districts establish an adequate language access infrastructure, especially for parents speaking lower-incidence languages.

Recommendations: K-12 Education

- 1) The Administration should ensure that states' ESEA flexibility waivers include a robust focus on ELL subgroup accountability, which has proven essential to understanding and addressing the gaps facing this group of students. As Congress weighs various proposals for the reauthorization of ESEA, the White House should maintain a focus on subgroup accountability based on frequent and meaningful assessments of ELLs' academic performance and language proficiency. The White House should also engage with state and local education agency administrators and national experts to evaluate the effectiveness of federal funding for new immigrant students under current legislation and solicit feedback from the field on proposed changes to Title III Immigrant funding.
- 2) Given the federal government's direct responsibility for immigration and refugee policy, it logically bears greater responsibility for supporting the costs and assuring the quality of education services provided to first-generation immigrant and refugee students. Accordingly, the White House and Departments of Education and HHS should engage with local mayors and school district leaders to: a) create goals and benchmarks for the effective integration of immigrant and refugee students, particularly those who arrive in the middle and high school years; b) establish cost ranges associated with effective practices that support desired educational and socio-emotional outcomes; and c) build consensus on approaches to ensuring that districts have sufficient funding to provide necessary academic and non-academic supports for late-arriving immigrant and refugee students, as well as language access services for LEP parents.
- 3) The Departments of Justice and Education should implement a large-scale capacity-building initiative focused on language access services for LEP parents and guardians, using the guidelines in the January 7, 2015 Dear Colleague Letter as a resource. This initiative should be accompanied by heightened federal oversight of districts' compliance with their obligations to ensure meaningful communication with all LEP parents, as established in civil rights laws as well as Titles I and III of ESEA and the IDEA.

VIII. Postsecondary Education

Postsecondary education is now widely regarded as requisite preparation for a career paying a family sustaining wage. Immigrants and refugees continue to lag behind their U.S.-born peers in terms of college enrollment and degree completion, however. Nineteen percent of first-generation (foreign-born) young adults (ages 21-26)—

and only 11 percent of first-generation Hispanics—have completed at least a two-year college degree, compared to a national average of 30 percent.^{xxxv}

Immigrant and refugee families often struggle to navigate the college admissions and financial aid processes, particularly if they are unfamiliar with the U.S. education system and/or are LEP.^{xxxvi} Even when first-generation immigrant students are able to overcome the barriers to college admission, they often face a number of risk factors that are associated with lower rates of retention and degree completion. Compared to the average U.S. college student, immigrant students are more likely to be low-income; attend college at older ages; and enroll in college part time.^{xxxvii} They are also more likely to require remediation at the college level: 52 percent of first-generation Hispanic college students and 40-percent of first-generation Asian students have taken at least one developmental education course, compared to 35 percent of all undergraduates.^{xxxviii} In many cases, these remedial needs stem from gaps in immigrant students' academic English proficiency. Students risk spending semesters or years in costly developmental education courses—which can deplete their financial aid resources—before beginning to earn credit toward their intended degree or certificate.

While the past several years have seen a heightened focus on college retention and completion rates, immigrant and refugee students and English Learners are often invisible in higher education data systems. At the national level, Integrated Postsecondary Data Systems (IPEDS) does not regularly collect or track information on immigrant/refugee students^{xxxix} or English Learners, and most states do not disaggregate these populations in their postsecondary education data systems.^{xl} Without such data, postsecondary education institutions lack a full picture of the educational and linguistic needs of their students, and policymakers at all levels are unable to determine whether investments targeting high-need students^{xli} are effectively serving immigrants and refugees.

Recommendations: Postsecondary Education

- 1) The White House and the Department of Education should support data collection regarding immigrant, refugee, and English Learner students at the postsecondary level, and dedicate new funding to build the field of research on effective approaches to increasing college retention and completion for these groups. As part of this effort they should: establish pilot programs to develop, evaluate, and expand promising practices, including efforts to accelerate and contextualize developmental ESL instruction as part of a pathway to a degree or certificate; use the existing structures of the WHIEEH and WHIAPPI to build visibility of postsecondary education reform efforts targeting immigrant and refugee students; and engage state higher education systems in a learning network focused on promising practices.
- 2) All federal investments in discretionary grant programs for postsecondary education should require applicants to demonstrate equitable access and participation by immigrant, refugee, and English Learner students.

IV. Small Business

According to a recent report by Partnership for a New American Economy, from 2007-2011, immigrants founded a large share of new businesses in health care and social assistance (28.7 percent); professional and business services (25.4 percent); construction (31.8 percent); retail trade (29.1 percent); leisure and hospitality (23.9 percent); educational services (28.7 percent); other services (28.2 percent); and transportation and utilities (29.4 percent). Notably, these immigrant-owned businesses contribute to employment creation not only for other immigrants, but also for the native born.

Immigrant entrepreneurs play a pivotal role in improving labor market integration for immigrants and refugees and may promote more even distribution of benefits of immigration within a country.^{xliii} While immigrants are more likely to set up businesses than their native born peers, they typically encounter greater obstacles to starting up, maintaining, and expanding their business.^{xliii}

The Small Business Administration's (SBA) Small Business Development Center (SBDC) provides technical assistance to small business and entrepreneurs through its 900 service sites.^{xliv} SBDC's goal is to provide entrepreneurs and other stakeholders with access to services and technical assistance during the different stages of business development and growth. Despite these goals, some have argued that SBDC programming does not address the needs of immigrant-owned businesses, in part because of a lack of linguistic and cultural resources.^{xlv}

Recommendations: Small Business

- 1) SBA should evaluate the relevance and effectiveness of its SBDC programming in meeting the needs of immigrants and refugees and take steps to address gaps in access, relevance and effectiveness of services. The Office of Intergovernmental Affairs/Office of Public Engagement and SBA should host a series of stakeholder engagement events to obtain feedback on how to improve delivery of multilingual services and grow immigrant and community-oriented programming. Particular program areas that should be covered include: (a) how to start and run a business; (b) connecting businesses with services, professional networks, and chambers of commerce; and (c) navigating state and local government bureaucracies.

ⁱ Donald M. Kerwin, Doris Meissner and Margie McHugh, Executive Action on Immigration: Six Ways to Make the System Work Better (Washington, DC: Migration Policy Institute, 2011) <http://www.migrationpolicy.org/research/executive-action-immigration-six-ways-make-system-work-better>.

ⁱⁱ *New Americans Success Act of 2014*, HR 4949, 113th Cong., 2nd sess., (June 24, 2014).

ⁱⁱⁱ Anne Colgan, Lisa Ann Kennedy and Nuala Doherty, *A Primer on Implementing Whole of Government Approaches* (Dublin: Center for Effective Services, 2014)

^{iv} Ibid.

^v Migration Policy Institute tabulation of data from The U.S. Census Bureau's 1980, 1990 and 2000 decennial censuses and pooled 2010-2012 American Community Surveys as cited in Margie McHugh, *Adult Education Needs of U.S. Immigrants and Refugees and Recommendations to Improve the Federal Government's Response in Meeting Them* (Washington, DC: Migration Policy Institute, paper submitted to OCTAE and is available from MPI on request).

^{vi} Ibid.

^{vii} U.S. Department of Education, Office of Career, Technical and Adult Education, National Reporting System: "State Enrollment by Program Type (ABE, ESL, ASE): All States," program years 2007-12.

^{viii} 23,834,400 U.S. adults lack a high school equivalent and 18,714,900 are limited English proficient—yet WIA Title II programs enrolled just 1,690,211 individuals in PY 2012-13; see McHugh, *Adult Education Needs of U.S. Immigrants and Refugees and Recommendations to Improve the Federal Government's Response in Meeting Them*.

^{ix} Social Policy Research Associates, *WIASRD Data Book* (PY 2012), prepared for the Office of Performance and Technology Employment and Training Administration, U.S. Department of Labor.

^x Margie McHugh, *Diploma, Please: Promoting Educational Attainment for DACA- and Potential DREAM Act-Eligible Youth* (Washington, DC: Migration Policy Institute, 2013) <http://www.migrationpolicy.org/research/diploma-please-promoting-educational-attainment-daca-and-potential-dream-act-eligible-youth>; Sarah Hooker, Margie McHugh and Angelo Mathay, *Lessons from the Local Level: DACA's Implementation and Impact on Education and Training Success* (Washington, DC: Migration Policy Institute, 2015), <http://www.migrationpolicy.org/research/lessons-local-level-dacas-implementation-and-impact-education-and-training-success>.

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- ^{xi} Margie McHugh, *Adult Education Needs of U.S. Immigrants and Refugees and Recommendations to Improve the Federal Government's Response in Meeting Them*; submitted electronically to the U.S. Department of Education's Office of Career, Technical and Adult Education in April 2014 to inform creation of the National Action Plan to Improve the Foundation Skills of U.S. Adults. Available from author upon request.
- ^{xii} Chhandasi Pandya, "Limited English Proficient Workers and Workforce Investment Act Challenges and Opportunities," *Migration Information Source*, July 2012, www.migrationpolicy.org/article/limited-english-proficient-workers-and-workforce-investment-act-challenges-and-opportunities.
- ^{xiii} U.S. Department of Labor, Employment and Training Administration, "Training and Employment Guidance Letter No. 02-14," updated July 14, 2014, http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7233.
- ^{xiv} See Jeanne Batalova and Michael Fix with Peter A. Creticos, *Uneven Progress: The Employment Pathways of Skilled Immigrants in the United States* (Washington, DC: Migration Policy Institute, 2008) <http://www.migrationpolicy.org/research/uneven-progress-employment-pathways-skilled-immigrants-united-states>; Madeleine Sumption, *Tackling Brain Waste: Strategies to Improve the Recognition of Immigrants' Foreign Qualifications* (Washington, DC: Migration Policy Institute, 2013) <http://www.migrationpolicy.org/research/tackling-brain-waste-strategies-improve-recognition-immigrants-foreign-qualifications>.
- ^{xv} A 2007 MPI report estimated that it would require about 277 million hours of English language instruction a year for six years to bring all current adult LPRs to a level of English proficiency needed to begin postsecondary education (for youth ages 17-24) or pass the naturalization test (for those ages 25 and over): see Margie McHugh, Julia Gelatt, and Michael Fix, *Adult English Language Instruction in the United States: Determining Need and Investing Wisely* (Washington, DC: Migration Policy Institute, 2007) <http://www.migrationpolicy.org/research/adult-english-language-instruction-united-states-determining-need-and-investing-wisely>.
- ^{xvi} MPI analysis of data from the U.S. Census Bureau's pooled 2011-2013 American Community Surveys.
- ^{xvii} Ibid.
- ^{xviii} Maki Park and Margie McHugh, *Immigrant Parents and Early Childhood Programs: Addressing Barriers of Literacy, Culture and Systems Knowledge*, (Washington DC: Migration Policy Institute, 2014).
- ^{xix} MPI analysis of the U.S. Census Bureau's pooled 2011-2013 American Community Survey data.
- ^{xx} Ibid.
- ^{xxi} Ibid.
- ^{xxii} Aaron Terrazas, *The Economic Integration of Immigrants in the United States: Long- and Short-Term Perspectives*, (Washington, DC: Migration Policy Institute), 2011.
- ^{xxiii} Leighton Ku and Mariellen Jewers, *Health Care for Immigrant Families: Current Policies and Issues* (Washington, DC: Migration Policy Institute, 2013).
- ^{xxiv} Ibid.
- ^{xxv} Hooker, et al., *Lessons from the Local Level*.
- ^{xxvi} Ibid.
- ^{xxvii} Ibid.; Sarah Hooker, Michael Fix, and Margie McHugh, *Education Reform in a Changing Georgia: Promoting High School and College Success for Immigrant Youth* (Washington, DC: Migration Policy Institute, 2014), www.migrationpolicy.org/research/education-reform-changing-georgia-promoting-high-school-and-college-success-immigrant-youth.
- ^{xxviii} U.S. Department of Labor, Employment and Training Administration, "Training and Employment Guidance Letter No. 02-14," updated July 14, 2014, http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7233.
- ^{xxix} MPI analysis of pooled 2009-2013 CPS-ASEC data.
- ^{xxx} Jeanne Batalova and Michael Fix, *Up for Grabs: The Gains and Prospects of First- and Second-Generation Young Adults* (Washington, DC: Migration Policy Institute, 2011), www.migrationpolicy.org/research/prospects-first-second-generation-young-adults-up-for-grabs; Sarah Hooker, Margie McHugh, and Michael Fix, *Critical Choices in Post-Recession California: Investing in the Educational and Career Success of Immigrant Youth* (Washington, DC: MPI, 2014), www.migrationpolicy.org/research/critical-choices-post-recession-california-educational-career-success-immigrant-youth; Sarah Hooker, Margie McHugh, Michael Fix, and Randy Capps, *Shaping Our Futures: The Educational and Career Success of Washington State's Immigrant Youth* (Washington, DC: Migration Policy Institute, 2013), www.migrationpolicy.org/pubs/immigrantstudents-Washington.pdf; Hooker, et al., *Education Reform in a Changing Georgia*;

^{xxxii} Ibid.

^{xxxiii} Hooker, et al., *Critical Choices in Post-Recession California*.

^{xxxiv} U.S. Department of Justice, Civil Rights Division and U.S. Department of Education, Office of Civil Rights, "Dear Colleague Letter: English Learner Students and Limited English Proficient Parents," January 7, 2015, <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-el-201501.pdf>.

^{xxxv} Hooker, et al., *Education Reform in a Changing Georgia*; Hooker, et al., *Lessons from the Local Level*.

^{xxxvi} MPI analysis of pooled 2009-2013 CPS-ASEC data.

^{xxxvii} Hooker, et al., *Critical Choices in Post-Recession California*.; Hooker, et al., *Education Reform in a Changing Georgia*; Hooker, et al., *Shaping Our Futures*.

^{xxxviii} Sandra Staklis and Laura Horn, *New Americans in Postsecondary Education: A Profile of Immigrant and Second-Generation American Undergraduates* (Washington, DC: U.S. Department of Education National Center for Education Statistics, 2012), <nces.ed.gov/pubs2012/2012213.pdf>.

^{xxxix} Ibid.

^{xl} The "nonresident alien" demographic group in IPEDS refers only to those noncitizens who are in the United States on a visa or temporary basis, such as international students.

^{xli} Hooker, et al., *Education Reform in a Changing Georgia*; Hooker, et al., *Critical Choices in Post-Recession California*.

^{xlii} The U.S. Department of Education explicitly includes English Learners and "new immigrants" in its definition of "high-need children" and "high-need students" in its Supplemental Priorities for Discretionary Grant Programs (76 FR 78486 (May 12, 2011)).

^{xliii} Ron Hayduk, "Immigration, Race, and Community Revitalization," *Aspen Institute*, <https://www.aspeninstitute.org/sites/default/files/content/upload/Hayduk.pdf>.

^{xliiii} Maria Vincenza Desiderio, *Policies to Support Immigrant Entrepreneurship* (Washington, DC: Migration Policy Institute, 2014), <http://www.migrationpolicy.org/research/policies-support-immigrant-entrepreneurship>.

^{xliiii} Small Business Development Centers, "900 service sites to serve your local business needs," accessed February 2, 2015, <https://www.sba.gov/offices/headquarters/osbdc/resources/11409>.

^{xliiii} Alison Moronta, *Immigrants as Small Business Owners: Challenges and Recommendations*, accessed February 2, 2014, http://www.ilctr.org/wp-content/uploads/2010/11/SymPP_Alison_Moronotaweb.pdf