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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
Washington, DC 20549

RE: National Integration Plan

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

On behalf of the National Council of La Raza (NCLR), the largest Hispanic civil rights and advocacy organization, we thank President Obama for his Presidential Memorandum on November 21, 2014 on Creating Welcoming Communities and Fully Integrating Immigrants and Refugees. While there was much to celebrate in last year's announcement, the directive to create a White House Task Force on New Americans is an important step as we look to develop a coordinated federal strategy that aligns civic, linguistic, and economic integration at all levels of government.

The recommendations below outline broad themes for the task force to consider as it undertakes a review of both existing and proposed federal policies to support immigrant integration across the country. This list is not meant to be exhaustive. NCLR fully endorses the recommendations submitted by the National Immigration Forum on behalf of the Naturalization Working Group and the Migration Policy Institute, and submits these additional recommendations for your consideration.

White House Office of New Americans

In the last Congress, NCLR played an integral role in the policy development and introduction of the New American Success Act, sponsored by Representatives Tony Cardenas (D-CA) and Ileana Ros-Lehtinen (R-FL). In addition to the creation of a task force to examine immigrant integration across the federal government, this important legislation called for the establishment of a National Office of New Americans within the executive office of the White House. It is worth noting, however, that congressional authorizing language is not required to create a new office like the one envisioned in the New American Success Act. While the work of the task force is a fundamental first step, the nation needs a permanent office with a strong mandate to continue the work of crafting and implementing a cohesive integration strategy. As you know too well, in the absence of a constant presence and clear mission, we risk maintaining our current patchwork of federal initiatives that lack both direction and achievable metrics for success.

One of the National Office of New Americans' primary roles should include overseeing a multiagency grant program as detailed in the New American Success Act. This grant, the

Integration Success Grant, would bring the Departments of Education, Health and Human Services, and Labor together to fund states and/or partnerships between municipalities and community-based organizations that create a comprehensive plan addressing civic, linguistic, and economic integration. Conceptually similar to the successful Promise Zone program, these grants are designed to encourage recipients to design systems that are scalable and replicable, but flexible enough to account for local considerations. Without being overly prescriptive, the purpose is to establish models of best practices that coordinate the three pillars of integration. Rather than maintaining existing siloes, immigrants and receiving communities alike will benefit if civic, linguistic, and economic integration are included in a cohesive policy.

To the extent that you may use your discretion to develop and implement even a modest version of such a program, as you did earlier in the administration with the Race to the Top program, we would strongly urge that you do so.

English-Language Acquisition

As the President's executive actions on immigration recognized, there are simply too many immigrants who are not actively pursuing citizenship. There has been considerable advocacy related to financial barriers to naturalization, as the high fee, rigid waiver, and other payment-related issues are demonstrably disincentivizing immigrants from taking this final step toward becoming U.S. citizens. We fully support efforts to make the process more affordable for aspiring Americans. Yet, language acquisition among Latino immigrants remains an equally powerful barrier to naturalization. In fact, according to the Pew Hispanic Center, 26% of Mexican lawful permanent residents cite language barriers or other personal factors as their primary reason for not completing naturalization. This is compared to the 18% of respondents citing financial and administrative barriers. Reinforced by the high fee, those who fear failing the English portion of the citizenship application opt to renew their lawful permanent residency status instead. The task force should encourage the United States Citizenship and Immigration Service (USCIS) to ensure access to citizenship resources in languages other than English. Even in an era of financial constraint, we believe that USCIS and the Department of Education should nonetheless make a considerable investment to strengthen the adult education system and English-language instruction for naturalization to better accommodate the actual demand. Moreover, we believe that affirmative steps in this direction, even modest ones, likely would encourage state-local governments, private foundations, and businesses to step up their investment in the citizenship process.

Economic Development

Access to credit and the accumulation of savings are both important ways all Americans, including immigrants and refugees, build their personal wealth for secure financial futures. Immigrant populations face particular challenges, however. Many come from countries with unregulated or even untrustworthy banking systems; others lack the English-language or financial literacy skills to effectively navigate the broad array of complex financial services and products offered in this country. Too often as a result, immigrants find themselves victims of predatory products and services with few protections available.

The federal government has a significant infrastructure of programs and enforcement systems designed to promote access to conventional financial services and protection against predatory schemes. However, with few exceptions, neither the program nor enforcement infrastructures are especially immigrant-friendly. Almost none are required to operate with even a modest degree of cultural competence to address the particular issues faced by immigrants and refugees. The Departments of the Treasury and Housing and Urban Development, together with the Consumer Financial Protection Bureau, should collaborate in developing a coherent, integrated strategy to ensure:

- Housing counseling and foreclosure prevention/mitigation programs are fully culturally competent.
- Volunteer Income Tax Assistance (VITA) and financial services programs reflect appropriate diversity.
- Enforcement programs include public education and appropriate social marketing targeted to immigrant and refugee groups and increase personnel diversity.

Health Promotion

Protection from contagious diseases, cardiovascular health, and management of chronic conditions are diverse health challenges. However, they share one common trait: in varying degrees all are influenced by certain life styles and behaviors. Immigrants and refugees, while generally no more likely than other residents to experience disease, may have other characteristics—low incomes and educational attainment and limited English proficiency—that limit their access to information on prevention and management of contagious and chronic diseases. Further exacerbating these traits, despite gains made through Affordable Care Act enrollment, many immigrants remain ineligible for health insurance coverage for a variety of immigration and employment-related reasons.

Federal, state, and local public health departments often devise social marketing and related campaigns to educate and instruct Americans, in an effort to minimize the spread of contagious diseases and encourage prevention and appropriate management of chronic conditions. However, few fully incorporate the messages, messengers, and media to reach newcomers. Typically, campaigns are tailored to the mainstream, with more diverse communities added as an afterthought, if at all.

The Department of Health and Human Services—especially the National Institutes of Health, the Centers for Disease Control and Prevention, and the Office of Minority Health—should develop a coordinated plan to ensure that all major social marketing campaigns designed to reduce the spread of contagious diseases, or to prevent and/or manage chronic diseases, target all affected populations, including immigrants and refugees. Such campaigns should include the transcreation, and not just translation, of social marketing materials targeted to specific subpopulations.

NCLR looks forward to working closely with the task force as it completes its important work on immigrant integration. Please do not hesitate to contact Victoria Benner in our office at vbenner@nclr.org / (202) 776-1760 if you have additional questions or wish to discuss further.

Sincerely,

A handwritten signature in black ink that reads "Chuck". The letters are cursive and stylized, with a long horizontal stroke extending from the end of the "k".

Charles Kamasaki
Senior Cabinet Advisor, NCLR