February 9, 2015

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

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

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

The State Coordinators of Refugee Resettlement (SCORR) is the national association of state refugee coordinators, administrators and managers. For more than 35 years, we’ve worked with the Office of Refugee Resettlement and the U.S. State Department to help resettle over three million refugees from 72 countries in all 50 states. On an annual basis, we’ve also provided assistance to an average of 20,000 Cuban/Haitian entrants and 24,000 asylees. Additionally, we’ve assisted unaccompanied minors, victims of human trafficking, survivors of torture, and Special Immigrant Visa Holders from Iraq and Afghanistan.

We are proud of our record of achievements. Refugees must overcome many challenges to succeed in the U.S. Most are survivors of war and some may have spent long periods in refugee camps. Most come to the U.S. destitute and with few possessions. Some refugees come from rural areas and societies with cultural beliefs very different from what’s commonly practiced in the U.S. They may not speak any English, be illiterate in any language or lacking transferrable job skills. Due to the vast diversity among refugees in the US Refugee Resettlement Program, others may come from urban settings, have advanced degrees and yet suffered total loss of their business, career and home. These refugees, such as medical professionals, face an uphill battle to obtain the knowledge and certifications, etc. necessary to resume their career or even stay connected in some way with their chosen occupation.
The success of the refugees is a testament to two key factors: a) the refugees’ fortitude and drive to rebuild their lives in their new adopted home; and b) the investment from the federal government and local communities in the refugee resettlement process. Funding from the State Department and the Office of Refugee Resettlement/DHHS enable state governments, in collaboration with county governments and local non-profit agencies, to support English language training, vocational skills training, employment services, case management and mental health services. All efforts are conducted with the goal of ensuring that refugees become economically and socially self-sufficient as quickly as possible. Refugees receive orientation about their new community. Conversely, local organizations interacting with refugees are also provided with orientation about the newly arrived refugee populations. Every service is designed with clear intentions and measurable goals.

Private support and mainstream federal and state programs are also key components of the refugee resettlement program’s success. Non-profits, particularly the Voluntary Agencies, raise funds from private donors and refer refugees to programs available for other low-income residents, such as community colleges and workforce training programs.

Over the years, many state refugee offices (SRO) have also assumed work related to helping immigrants residing in our respective state. In those states, the SRO has become the clearinghouse of information on both immigrants and refugees. During the recent unaccompanied minor crisis at the U.S. border, our offices handled hundreds of phone calls from residents asking questions, offering help, or voicing their concerns about the situation.

Present in the pages following are: First—Recommendations for the Task Force and Secondly—Concerns. These comments are based on years of real work experiences and deep knowledge about the refugee and immigrant communities. The concerns address the current state of the refugee resettlement and changes that we feel would greatly improve the successful integration of refugees.

On behalf of SCORR members, I and the Executive Board officers look forward to discussing our recommendations and answering any questions you may have.

Sincerely,

Marlene S. Myers
Acting President
PART II. SCORR RECOMMENDATIONS

Recommendation 1 – Key principles that should drive the work of the Task Force on Immigrant Integration Policy include:

A. Effective federal, state and local partnership – As you know, immigration policies are responsibilities of the federal government, but immigrant integration happens at the local community level. While state and local governments have little say over how many or who should come to the U.S., immigrants and refugees attend local schools, use local public health, public safety and other human services. The refugee resettlement model creates a clear federal and state partnership with federal funding support to meet the anticipated impact on local services. The federal and state partnership also recognizes that different states are impacted differently by the number and demographics of the immigrants and may need different level of support. We believe it’s important for the federal government to provide adequate funding to state governments to create locally appropriate programs with a common set of mutually agreed upon set of outcome measures toward successful immigrant and refugee integration.

B. Clear immigrant integration goals, definition and pathways – We believe the goals for successful immigrant integration should be full economic and social self-sufficiency of the immigrants and refugees. We also support the integration definition and pathways established by the Grantmakers Concerned with Immigrants and Refugee summarized below:

Definition: Immigrant integration is a dynamic, two-way process in which newcomers and the receiving society work together to build secure, vibrant, and cohesive communities.

Pathways to Integration include:

i. **Language & Education**: Eliminating language barriers, promoting English proficiency, and providing educational opportunities are key to successful integration.

ii. **Health, Well-being, & Economic Mobility**: Programs that promote health, well-being and economic mobility are essential to helping immigrants establish a foothold and to strengthening the broader community.

iii. **Citizenship & Civic Participation**: Opportunities for newcomers to participate in civic life are vital to integration.

iv. **Equal Treatment & Opportunity**: Fair laws and policies are critical building blocks for successful integration.

v. **Social & Cultural Interaction**: Such interaction fosters understanding, creates a sense of belonging, and facilitates mutual engagement.

vi. **Communitywide Planning**: As much as possible, intentional and inclusive planning allows newcomers and longtime residents to work together to
facilitate immigrant integration and promote overall safety, health, and well-being of communities.

C. **Support innovation and scale** – There are great examples of successful integration programs led by local and state governments, nonprofits, private philanthropy, academic institutions and private corporations. The federal government should catalogue these programs to share them with all communities, fund replications and/or expansion of the programs, and encourage new innovative solutions to meet the scale of the challenge. We need to meet the needs of the 40 million immigrants already here and the continuing stream of immigrants coming each year.

D. **Set clear priorities and prevent unnecessary tradeoffs** – In time of limited resources, the federal government should work with state and local governments to set clear priorities. We must help the most vulnerable immigrants and refugees so that they can realize their potential. Early intervention is key to successful economic and social integration. Support for refugees and immigrants who share common profile should be adequately provided so that assistance for one group does not come at the expense of the other group.

**Recommendation 2 – Provide for Specialized services to meet the unique needs of refugees and immigrants**

Since newcomers to the US are each unique and bring their own special strengths and weaknesses, any approach must be multi-faceted. In other words, one size does not fit all newcomers. Due to the long engagement of state refugee coordinators in this field, many lessons have been learned about what works and what does not. Still, new populations may require re-tooling of services and the best method of delivery of those services. The program must adapt and adjust accordingly. For example, some are highly educated and skilled, but still unfamiliar with the world of work in the US, the English language and/or what it will take for them to become recertified to practice their profession. On the opposite end of the spectrum, refugees and migrants who are low-skilled, with little formal education and without English proficiency will need extra assistance to achieve economic self-sufficiency. Both groups will need assistance to be able to integrate successfully both economically and socially in the U.S.

The federal government should provide additional funding for services uniquely needed by refugees and immigrants, including:

1. **English language training** - Currently, neither refugee funding nor mainstream adult education funding has enough resources to meet the needs of limited-English refugees and immigrants. For those who are illiterate in their own native language, extra effort is needed to make sure that they can succeed.

2. **Vocational training and employment services** – Many existing vocational training
programs require eighth-grade education equivalent. Refugees and immigrants whose education is limited cannot compete for placements in these programs. Special vocational training programs are needed to meet the refugees and immigrants where they are, not where they should be. Low-skilled immigrants and refugees also need help to prepare them for job application, interview and work expectations. In many instances, they need job development support to link them to job openings and successful job retention.

3. **Recertification** – Highly-skilled refugees and immigrants should be provided with assistance to put their training and work experience to good use for the benefits of the local community as well as to allow for them to utilize their professional skills and reach their full potential.

4. **Supplemental educational support** – Refugee and immigrant children whose education was disrupted for a long period of time, especially those entering U.S. at middle and high school level cannot catch up with their peers without additional support. After school tutoring and summer school support are critical to help these children succeed in schools.

5. **Adjustment Counseling** – It is very challenging for many refugees and immigrants to understand and navigate the various complex systems we have in the U.S. Having knowledgeable social workers helping refugees and immigrants to understand their choices is critical to ensure that they make the right decisions, preventing costly mistakes that could have long-term negative consequences.

6. **Cultural orientation and citizenship training** – Refugees and immigrants who come from cultures very different than that of the U.S. need to understand cultural norms and practices in the U.S. Clear understanding can reduce social tension within refugee/immigrant families as well as between refugees/immigrants and the local community. In addition, helping refugees and immigrants prepare for US citizenship is one of the best ways to become fully integrated and Americans benefit from their civic engagement as well.

**Recommendation 3 – Make refugees and immigrants a key priority population for federal funded programs**

Often federally funded programs target low-income households and grant recipients must develop plans to show how funding will be best used to meet the intent of the federal programs. We recommend that, an additional requirement be made to federal grant recipients to articulate how refugees and immigrant needs are integrated and included in these mainstream programs. For example, such a requirement can be added to CSCB and CDBG block grants, HUD supported programs, Medicaid, HeadStart, K-12 funding, Workforce Investment Act, Small Business Loans, etc. If a population priority is established, it is critical that grant recipients articulate anticipated goals and outcomes achieved. It is also important
that support services such as interpretation and transportation be considered and budgeted for client access; otherwise, the intent may be there but never realized.

**Recommendation 4 – Engage and inform local communities**

Local communities receiving refugees and immigrants should be engaged constructively. Information about refugee admission, asylees, unaccompanied minors and flow of immigrants should be made available to state and local governments who need to plan for the newcomers. Information such as that provided by the Center for Applied Linguistics who educate about diverse cultures should be better disseminated. This is especially true for educators, law enforcement and mainstream organizations who will come into contact with refugee/immigrant parents and children.

**Recommendation 5 – Address language barriers and the need for translation and interpretation services and financial reimbursement**

The diversity of refugees and immigrants in the U.S. today requires that state, local governments and institutions delivering services have access to interpretation in multiple languages. The cost associated with multi-language service capacity can be expensive. The federal government should engage public and private entities who are at the forefront of translation and interpretation work to develop solutions that can serve the unique needs of different local communities all across America. A national response may be needed to keep the cost more reasonable. While significant advances have been made by technology companies in information translation, accuracy remains a concern. Perhaps, increased efforts could be applied to solve this issue.

**Recommendation 6 – Engage State Refugee Coordinators in the immigrant integration planning and development**

State Refugee Coordinators (SRC) are uniquely qualified to provide insight and knowledge to the Task Force. We recommend that SCORR members continue to be engaged in future consultations and deliberations of the Task Force on New Americans. SRC’s often serve as the bridge between the federal initiatives and successful implementation in local communities. Assuming that there will be additional federal resources to implement integration strategies, we will position ourselves to assume any additional responsibilities needed to help implement strategies and assist the immigrant and refugee residents of our states.
PART II. SPECIAL CONCERNS ABOUT THE CURRENT STATE OF REFUGEE RESSETTLEMENT PROGRAM AND RECOMMENDATIONS FOR IMPROVEMENT

SCORR has been working for more than 30 years to help shape the focus of federal refugee resettlement, including the need to address refugee integration. For example, in 2011, SCORR was actively involved in the National Security Council’s dialogues on refugee resettlement reform. A number of recommendations for structural reform came out of that dialogue. SCORR also endorsed H.R.1475 - Domestic Refugee Resettlement Reform and Modernization Act of 2011 and shared its recommendations for U.S. Refugee Resettlement restructure with Congress specifically Congressman Peters, MI-9th.

Concern 1- Inadequate funding
The U.S. Department of State, through the Bureau of Population, Refugees and Migration (PRM), establishes that the intent of the USRAP is to rescue those individuals who are most at risk of harm and the most vulnerable. However, the U.S. Department of Health and Human Services, through the Office of Refugee Resettlement (ORR), does not have adequate funding to support states to meet the high level of needs of these vulnerable individuals once they arrive in the U.S. State and local governments cannot be expected to fill in the funding gap created by lack of funding from ORR.

Concern 2- Expanded scope of responsibilities
Federal partners and state refugee programs need to more adequately address: a) the fact that the complexity of the refugee program has increased due to the diversity of the populations and the high level of trauma experienced by refugees coming from Africa and the Middle East; and b) its mandate has increased to serve a much broader population that includes refugees, asylees, Cuban and Haitian entrants, unaccompanied minors, and victims of trafficking and torture. Competitive needs among the populations served by ORR can cause additional unanticipated funding reduction and decreased state and local program support.

Concern 3- Successful integration of refugees and other vulnerable populations
Federal partners should recognize that successful integration of refugees and other vulnerable populations served by ORR goes beyond early economic self-sufficiency with a pre-determined time limit such as eight months from date of arrival. For many refugees, integration may require a two-year engagement with intensive case management support to ensure that the refugee has the health, cultural orientation and English language skills to take advantage of the opportunities that are provided. Job placements should match the right person in the right job which will not only achieve welfare avoidance, but also establish a follow-on career ladder to best support the assets and aspirations refugees bring to the U.S. Poor resettlement with ineffective integration leads to the creation of new impoverished and underemployed families with limited options for improvement that create more problems for refugees and their receiving communities in the long term.
Concern 4- Index self-sufficiency
The goal of refugee resettlement, as stated in the Refugee Act, is “to achieve economic self-sufficiency as quickly as possible after arrival in the United States.” However, neither the Refugee Act nor the implementing regulations at 45 CFR 400 define or provide metrics for “self-sufficiency”. As currently implemented and measured by ORR, self-sufficiency is simply the pursuit of welfare avoidance and the acceptance of poverty. True family economic self-sufficiency is measured as the income a household requires to meet the costs of basic needs (including healthcare, housing, child care, transportation, food and miscellaneous items which are no more than 10% of the overall budget). True economic self-sufficiency also considers family size, the ages of children in the family and the geographical location of the family within the state. Furthermore, true economic self-sufficiency includes costs unique to a refugee family. These factors include but are not limited to repayment of travel loans, cultural orientation, language acquisition, job re-certification, and fees associated with obtaining a variety of immigration documentation. If self-sufficiency is to remain the goal of resettlement, then reform is needed to clarify what the federal government and receiving communities agree upon as the meaning and metric for “self-sufficiency.”

Concern 5- Address the issue of movement of refugees via secondary migration
To adequately serve refugees, accurate data and a funding stream that follows the refugee is needed. The dynamic flow of refugees from initial resettlement areas to nontraditional areas and new receiving communities strains an already burdened system. Secondary migration should be seen in the context of a broader discussion about ORR systems for counting and tracking eligible clients and for formula allocations to ensure that both the base allocations as well as accommodations for migration are considered. The current system of verification does not adequately allocate funds to all eligible clients, or clients who are claimed by more than one state and are consequently discarded from funding formulas. Severe ongoing problems have been identified with ORR’s ability to accurately count, verify, and allocate funding for eligible clients who do not arrive through certain arrival processes, resulting in states providing required services and receiving no federal financial assistance.

Concern 6- Effective and frequent collaboration among federal granting agencies and the state refugee program as well as local service providers
When significant funding strategies and priorities are established with no discussion or input from states and service providers, the program suffers affecting outcomes. The refugee program is designed as a partnership; all involved parties should be included in the development of program goals and funding shifts. A lack of consultation with states about changes such as the methodology for calculating formula funding as happened in FFY 2010 Refugee Social Services and Targeted Assistance Grant funding, OR the parameters of allowable activities in grant funded programs such as the recent dramatic changes with the Refugee School Impact Grant and termination of Preventive
Health to Health Promotion exacerbates a state's ability to develop, contract for and deliver services. Since refugee resettlement is and should remain as a federal and state partnership, improved coordination with states through increased consultation and input is essential along with more timely release of adequate funds to states.