



Immigrants and WIOA Services

Comparison of Sociodemographic Characteristics of Native- and Foreign-Born Adults in the United States

By Margie McHugh and Madeleine Morawski

Since 1990, roughly 1 million foreign-born individuals have settled in the United States per year, many with needs for adult education and workforce training services. Implementation of the *Workforce Innovation and Opportunity Act* (WIOA)—federal legislation that provides the framework for provision of adult education and workforce services across the United States via a federal-state partnership—stands to play a critical role in supporting the upward mobility of these immigrants and refugees in the workforce and their successful integration into the civic life of the cities and states where they have settled.

This fact sheet provides a profile of key characteristics of foreign-born and native-born residents of the United States that are relevant to understanding needs for adult education and workforce training services. It is part of a larger series of state and county fact sheets produced by the Migration Policy Institute's (MPI) National Center on Immigrant Integration Policy to support equitable implementation of WIOA, as well as consideration of other policy and funding initiatives to promote the successful linguistic, economic, and civic integration of immigrants and refugees in the United States.

The estimates provided are based on MPI analysis of U.S. Census Bureau American Community Survey (ACS) data pooled over the 2009-13 period in order to provide the most detailed sociodemographic portrait possible of residents' characteristics. Mirroring the design of federal adult education and workforce training program rules, data are provided for those ages 16 and over.

1) Nativity, Age, and Origin of U.S. Residents

As of 2009-13, the United States was home to more than 246 million residents ages 16 and older; 38 million of whom, or 15 percent, were foreign born. Relatively fewer of the country's foreign-born individuals are ages 16-18 or ages 19-24 as compared to native-born residents; rather, immigrants and refugees are more likely to be in their prime working years, with 70 percent falling in the 25-to-44 and 45-to-59 age bands (compared to 58 percent of those who are native born).

More than half (53 percent) of U.S. immigrants ages 16 and over hail from Latin America; 28 percent are of Asian origin, 13 percent are European, and 4 percent are from Africa.

Table 1. Age, Gender, and Origin of the U.S. Population (ages 16 and older), by Nativity, 2009-13

	Total		Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent	
Total population ages 16 and over	246,129,000	208,055,000	100%	38,074,000	100%	
Age Groups						
16 to 18	13,092,000	12,167,000	6%	925,000	2%	
19 to 24	26,495,000	23,576,000	11%	2,919,000	8%	
25 to 44	82,818,000	66,194,000	32%	16,624,000	44%	
45 to 59	64,454,000	54,354,000	26%	10,100,000	27%	
60 and over	59,270,000	51,765,000	25%	7,506,000	20%	
Gender						
Female	126,289,000	106,851,000	51%	19,437,000	51%	
Regions of Birth (excluding birth at sea and unspecified countries)						
Africa	X	X	X	1,483,000	4%	
Asia	X	X	X	10,703,000	28%	
Europe	X	X	X	4,821,000	13%	
Latin America	X	X	X	20,058,000	53%	
Northern America	X	X	X	806,000	2%	
Oceania	X	X	X	175,000	0%	

Notes: Latin America includes South America, Central America, Mexico, and the Caribbean; Northern America includes Canada, Bermuda, Greenland, and St. Pierre and Miquelon. All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: Migration Policy Institute (MPI) analysis of U.S. Census Bureau data from the pooled 2009-13 American Community Survey (ACS).

Relevance for WIOA Implementation:

Provisions of WIOA’s Title I address the country’s three primary workforce training programs (youth, adult, and dislocated worker), target subpopulations within them (e.g. out-of-school youth ages 16 to 24), and the nature of services to be provided. Title II of the law—Adult Education and Literacy (commonly referred to as the *Adult Education and Family Literacy Act* or AEFLA)—provides the national framework for services designed to build the basic skills of adults who lack a high school diploma or equivalent or who are Limited English Proficient (LEP). States and localities must ensure that eligible populations are given equitable access to information and services provided under the law in order not to run afoul of federal civil-rights and antidiscrimination provisions. This includes, for example, ensuring that language

barriers do not impede access to information and services provided by the American Job Centers (formerly known as One-Stop Career Centers) through which states and localities organize local access to WIOA-funded services. Given the highly diverse nature of the foreign-born population (and the range of educational backgrounds and levels of English proficiency—as described below), all levels of government engaged in implementing WIOA face complex challenges in ensuring that the nation’s large and diverse immigrant population has equitable access to services provided under the law.

2) Educational Attainment

Foreign-born young adults represent only

about 7 percent of the country's 16-to-18-year-old population; however, they comprise almost 14 percent of out-of-school youth in this age range, and are twice as likely to lack a high school diploma or equivalent (HSD/E) and not be enrolled in school as their native-born peers. Similarly, immigrant young adults are 11 percent of 19-to-24-year-olds but are more than twice as likely as native-born peers to lack a HSD/E, comprising 23 percent of residents in this age range who have not obtained a HSD/E. Further, foreign-born young adults who lack a HSD/E are significantly less likely than their native-born peers to be enrolled in school (12 percent versus 20 percent). Finally, among those not enrolled in school, foreign-born young adults are far more likely than the native born to be working (55 percent versus 31 percent).

Foreign-born individuals account for roughly 17 percent of U.S. residents ages 25 and older;

they are almost three times more likely than the native born to lack a HSD/E, accounting for 37 percent of adults in this age group who have not completed high school. At the other end of the education spectrum, foreign-born individuals are roughly as likely as the native born to hold a bachelor's degree or higher (28 percent versus 29 percent).

Relevance for WIOA Implementation: Out-of-school youth are a primary focus of WIOA's Title I workforce services, and adults who lack a HSD/E are targets for both Title I and Title II services. Given that foreign-born individuals are significantly over-represented among those with no HSD/E in the three age bands, services created with these funds should be targeted in equitable measure to meet their needs. This will represent a shift for many systems that heretofore have not prioritized those with basic skill needs (whether native- or foreign born) for

Table 2. Educational Attainment of U.S. Residents (ages 16 and older), by Nativity, 2009-13

Educational Attainment	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Population ages 16 to 18	13,092,000	12,167,000	100%	925,000	100%
Not enrolled and no high school diploma or equivalent	543,000	469,000	4%	74,000	8%
Population ages 19 to 24	26,495,000	23,576,000	100%	2,919,000	100%
With at least high school diploma or equivalent	23,437,000	21,217,000	90%	2,220,000	76%
Without high school diploma or equivalent	3,058,000	2,359,000	10%	699,000	24%
Enrolled in school	559,000	472,000	20%	87,000	12%
Not enrolled in school and not employed	1,381,000	1,155,000	49%	226,000	32%
Not enrolled in school and employed	1,118,000	732,000	31%	386,000	55%
Population ages 25 and older	206,542,000	172,312,000	100%	34,230,000	100%
Less than high school diploma or equivalent	28,997,000	18,294,000	11%	10,702,000	31%
High school diploma or equivalent	58,303,000	50,668,000	29%	7,635,000	22%
Some college or associate's degree	59,954,000	53,494,000	31%	6,460,000	19%
Bachelor's, graduate, or professional degree	59,289,000	49,856,000	29%	9,432,000	28%
Foreign college-educated	X	X	X	5,203,000	55%

Note: All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

workforce training services, and/or whose service design is largely sequential—i.e. expecting adults to complete basic skills requirements before gaining access to workforce training programs. At the same time, provisions in the law that promote the use of career pathway service designs for serving WIOA clients pose especially steep capacity-building challenges for nearly all states, given the difficulties many such pathway programs face in equitably serving adults with basic skills needs.¹ Integrated education and training models must also comply with immigration status restrictions placed on Title I-funded programs.² However, while those who lack work authorization are not eligible for WIOA-funded workforce services, all refugees and the majority of immigrants legally reside in the United States and are therefore eligible for Title I as well as Title II services, which are not subject to immigration status restrictions.³

Finally, the analysis also shows that immigrants under age 25 who lack a HSD/E are far more likely than their native-born counterparts to be employed and not enrolled in school. This points to a need for education and training services designed for “nontraditional” students—i.e., in addition to using appropriate instructional designs, programs should anticipate the needs of part-time students, the demands of their work schedules, and transportation issues or other constraints they may face in attending and completing more traditionally structured programs.

3) Limited English Proficiency and Educational Attainment

Estimates of limited English proficiency among U.S. residents are provided below given the relevance of LEP status⁴ for access to WIOA-funded services—e.g., English Language Acquisition services (formerly known as English-as-a-Second-Language or ESL) are a key element of AEFLA services, while adult English learners

meet the “priority” definition for adult workforce services.⁵ Table 3 also provides individuals’ LEP status crossed with levels of educational attainment, in order to inform the efforts of policymakers and agency administrators seeking to ensure that federally funded education and training services equitably meet the needs of LEP individuals with different levels of formal education.

Foreign-born individuals account for 87 percent of the country’s LEP residents, who number nearly 22.8 million. Among all LEP individuals ages 19 to 24 and ages 25 and over, 10.2 million lack a HSD/E, indicating that 32 percent of the country’s low-educated adults are also LEP. Significant numbers of LEP individuals also have high levels of underlying education, including more than 5 million of those ages 25 and older who have earned a high school diploma or equivalent, and an additional nearly 6 million who have either completed some college or an associate’s degree or who have earned a bachelor’s degree or higher.

Relevance for WIOA Implementation: Implementers of WIOA will face complex challenges in equitably reflecting the significant and wide range of LEP learner needs and goals in the unified state service plans that will govern state service provision and which the U.S. Secretaries of Labor and Education must ultimately approve. For one, the country’s LEP residents include those who need AEFLA services but may not seek the employment or postsecondary transition and completion goals that are the primary focus of the law’s narrow accountability measures—for example, immigrant mothers of young children seeking literacy and other programming that will help them support their children’s kindergarten readiness, or those seeking citizenship preparation services.

In addition, the law’s significant new emphasis on postsecondary training is likely to pose major challenges for state and local systems that in the past have generally provided ESL and workforce training services separately and/or served few low-skilled or LEP individu-

als in Title I programs. While new provisions in WIOA do target workforce services to these basic skills-deficient individuals, the record of career pathway models and other training programs in providing equitable access to individuals who are low-educated and/or LEP is very weak. For example, over the past five years LEP individuals have consistently comprised less than 2 percent of individuals receiving Title I-funded intensive or training services.⁶ Significant policy changes and capacity-building will be needed in many parts of the United States as states and localities take steps to address their obligation to

provide equitable access to Title I-funded programs for low-educated LEP individuals, as well as the millions of LEP adults who already possess a high school diploma or higher and are positioned to directly access postsecondary level training programs.

4) Brain Waste

“Brain waste”—the phrase used to describe when individuals with four-year college degrees or higher work in low-skilled jobs or

Table 3. Limited English Proficiency and Educational Attainment of U.S. Residents (ages 16 and older), by Nativity, 2009-13

LEP Population by Educational Attainment	Total	Native Born		Foreign Born	
	Number	Number	Percent Native Born	Number	Percent Foreign Born
Total LEP population	22,762,000	3,009,000	13%	19,753,000	87%
	Number	Number	Percent	Number	Percent
LEP population ages 16 to 18	519,000	259,000	100%	261,000	100%
Not enrolled and no high school diploma or equivalent	66,000	18,000	7%	47,000	18%
LEP population ages 19 to 24	1,623,000	392,000	100%	1,231,000	100%
With at least high school diploma or equivalent	1,030,000	308,000	78%	722,000	59%
Without high school diploma or equivalent	593,000	85,000	22%	509,000	41%
Enrolled in school	54,000	15,000	18%	39,000	8%
Not enrolled in school and not employed	202,000	37,000	44%	165,000	32%
Not enrolled in school and employed	337,000	33,000	39%	304,000	60%
LEP population ages 25 and older	20,619,000	2,358,000	100%	18,261,000	100%
Less than high school diploma or equivalent	9,647,000	909,000	39%	8,738,000	48%
High school diploma or equivalent	5,091,000	624,000	26%	4,467,000	24%
Some college or associate's degree	2,949,000	473,000	20%	2,477,000	14%
Bachelor's, graduate, or professional degree	2,932,000	352,000	15%	2,579,000	14%

Notes: Limited English Proficient (LEP) refers to any person age 5 and older who reported speaking English less than "very well" as classified by the U.S. Census Bureau. All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

Table 4. Brain Waste among U.S. Residents (ages 25 and older), by Nativity, 2009-13

Brain Waste	Native Born		Foreign Born	
	Number	Percent	Number	Percent
Total civilian, college-educated labor force	37,837,000	100%	7,139,000	100%
Underutilized (i.e., in low-skilled jobs or unemployed)	6,876,000	18%	1,712,000	24%

Note: All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

are unemployed—is a particular concern for foreign-educated immigrants given the unique barriers they often face in attempting to transfer their education, training, and work experience to the U.S. labor market.⁷ Fifty-five percent of U.S. foreign-born residents who possess a college degree or higher were educated abroad (see Table 2), indicating that a significant share of the nation’s highly educated immigrants and refugees is at risk for brain waste.

Data provided in Table 3 point to one of the most significant factors responsible for brain waste—limited English proficiency. Among foreign-born LEP individuals ages 25 and older, 2.6 million (14 percent) have completed a bachelor’s degree or higher. Few adult education programs currently provide instruction that can help these individuals acquire the academic or professional-level English that will allow them to fully apply their education and training in the U.S. labor market.

In addition to difficulties accessing professional-level English classes, other factors that can contribute to brain waste include lack of recognition by employers or licensing bodies of academic or professional qualifications obtained abroad, difficulties in filling gaps in education or gaining U.S. work experience, steep and expensive barriers to gaining professional licenses, and/or poor understanding of U.S. job search norms. Table 4 provides estimates of brain waste among native- and foreign-born U.S. residents, showing that almost one-fifth of all highly educated workers in the country are affected, with the high levels of education earned by those who are foreign born more likely to be underutilized (24 percent versus 18 percent).

Relevance for WIOA Implementation: Highly educated individuals who are LEP fall into the “basic skills deficient” service priority category for Title I adult workforce services and also qualify for AEFLA-funded services. Many of these individuals have degrees in the health-care, STEM, and education fields where their skills can be applied in high-demand occupations. Nimble workforce and adult education programs can help address the particular needs of these individuals by braiding funds across titles—or using strictly Title I funds—to help them return to jobs in their profession or a related field that will leverage the significant investments they have already made in their education and training.

5) Parents of Young Children

Parents of young children have long been a population of special focus for adult education and training programs due to the powerful role education and skills play in helping them provide economic stability for their family, and the predictive role of parental education – particularly the mother’s—for the future education success of their children. This focus is especially pertinent now, with policymakers at all levels of government engaged in intensive efforts to scale quality early childhood programs that will close gaps in school readiness that could otherwise threaten children’s lifelong education and career prospects. As their children’s first and most important teachers, parents are universally acknowledged as critical to the success of these efforts.

Though only 15 percent of the U.S. population

Table 5. Family Structure and Young-Child Parental Status for U.S. Residents (ages 16 and older), by Nativity, 2009-13

Parental Status	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Reside with at least one child under age 18	61,455,000	48,200,000	100%	13,255,000	100%
Single mother	11,199,000	9,453,000	20%	1,746,000	13%
Single father	3,410,000	2,778,000	6%	632,000	5%
Two parents	46,846,000	35,970,000	75%	10,877,000	82%
Reside with at least one child ages 0-8	36,407,000	28,110,000	100%	8,296,000	100%
Limited English Proficient (LEP)	4,817,000	427,000	2%	4,390,000	53%
Low-educated	4,720,000	2,176,000	8%	2,544,000	31%
Low-income (below 200% of FPL)	13,852,000	9,554,000	34%	4,298,000	52%

FPL = Federal poverty level.

Notes: Limited English Proficient (LEP) refers to any person age 5 and older who reported speaking English less than "very well" as classified by the U.S. Census Bureau. The federal poverty level (FPL), calculated based on total family income before taxes (excluding capital gains and noncash benefits such as food stamps), was \$23,834 for a family of four in 2013. All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

ages 16 and older, immigrants and refugees account for 22 percent of parents residing with at least one child under age 18, and 23 percent of those with at least one child ages 0-8. Among parents residing with a child under age 18, single-mother or single-father households are less common among the foreign born (18 percent versus 25 percent for native born). Most strikingly, immigrants and refugees comprise 54 percent of the country's low-educated parents of young children, being almost four times more likely than their native-born counterparts to lack a high school diploma or equivalent. Foreign-born parents of young children are also significantly more likely to have low incomes—52 percent versus 34 percent of the native born. Not surprisingly, foreign-born parents account for the vast majority of U.S. LEP parents of young children (91 percent).

Relevance for WIOA Implementation: Though WIOA's Title II provisions speak of services that "enable parents or family members to support their children's learning needs" and provide "training for parents or family members regarding how to be ... full partners in the education of their children," the law's performance measures leave little room for states and localities to

serve parents who are arguably most in need of these services. Many low-educated and/or LEP parents who seek such programs do not have learning goals that align with the law's primary performance measures—particularly those focused on employment, earnings, and secondary/postsecondary degree and credential attainment.⁸ With all WIOA-funded programs judged according to these measures, and with states facing financial penalties should they not meet performance targets, many states and localities may be reluctant to provide AEFLA services to low-educated and LEP parents whose primary concerns are basic literacy and supporting their children's kindergarten readiness and future educational success. Should states choose to maintain parent-focused services for this population they would likely need to negotiate lower performance targets for these programs on the law's six accountability measures, and presumably judge their performance against state measures that better reflect expected outcomes of parent-focused programs. Alternatively, states and localities may simply avoid serving many parents of their most at-risk young children with

Table 6. Poverty and Health Insurance for U.S. Residents (ages 16 and older), by Nativity, 2009-13

Poverty	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Population (for whom poverty status is determined)	239,285,000	201,737,000	100%	37,548,000	100%
Below 100% of FPL	32,528,000	25,764,000	13%	6,764,000	18%
100-199% of FPL	43,014,000	33,858,000	17%	9,156,000	24%
At or above 200% of FPL	163,743,000	142,114,000	70%	21,629,000	58%
Health Insurance Coverage					
Total population	246,129,000	208,055,000	100%	38,074,000	100%
No health insurance coverage	42,807,000	30,034,000	14%	12,773,000	34%

FPL = Federal poverty level.

Notes: The federal poverty level (FPL), calculated based on total family income before taxes (excluding capital gains and noncash benefits such as food stamps), was \$23,834 for a family of four in 2013. All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

AEFLA funds—even though failing to address their needs could undermine the success of state and federal investments in early childhood education and care services.

6) Poverty and Health Insurance

WIOA's investments are intended to help meet local needs for skilled workers while also reducing welfare dependency and supporting workers in attaining education and skills that will allow them to earn a family-sustaining wage. While many U.S. immigrants and refugees have high levels of education and earnings, Table 6 data indicate that foreign-born residents are significantly more likely to earn below either 100 percent or 200 percent of the federal poverty level (FPL),⁹ with 42 percent falling below the 200 percent threshold as compared to 30 percent of those who are native born. Looking to an additional indicator of economic vulnerability, U.S. foreign-born adults are almost 2.5 times more likely to lack health insurance coverage compared to those who are native born.

Relevance for WIOA Implementation: WIOA's broad architecture as well as many of its specific provisions place a tight focus on directing services to low-income individuals, with the goal of helping them attain the education, degrees, and credentials they need to ensure a lifetime

of improved earnings and economic stability. The disproportionate representation of foreign-born individuals among U.S. residents living in or near poverty provide important measures against which the adequacy of state and local service designs and equity in distribution of services can be gauged.

7) U.S. Citizenship and Immigration Status

Publicly available data from the U.S. Census Bureau's American Community Survey (ACS) are the basis for all figures provided in the preceding sections of this profile. However, immigration status affects eligibility for certain WIOA services, and the ACS does not collect detailed information on respondents' immigration status. To better assist stakeholders in considering the interplay of immigration status with WIOA implementation efforts, Table 7 provides MPI estimates of the shares of foreign-born U.S. residents in key immigration-status categories. The estimates are based on a methodology that imputes immigration status from two Census Bureau surveys—the ACS and the Survey of Income and Program Participation (SIPP).¹⁰ In part because this methodology involves inflating ACS figures in order to account for presumed undercounting of noncitizens, especially

Table 7. U.S. Citizenship Status of Foreign-Born Residents (ages 16 and older) in the United States, 2009-13

U.S. Citizenship Status	Number	Percent
Foreign born	41,534,000	100%
Naturalized citizens	17,601,000	42%
Noncitizens	23,933,000	58%
Legal permanent residents	11,981,000	50%
Legal nonimmigrants	1,791,000	7%
Unauthorized immigrants	10,161,000	42%
DACA immediately eligible (2012)	1,074,000	11%
DACA eligible but for education (2012)	398,000	4%

Note: All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Sources: MPI analysis of pooled 2009-13 ACS, and the 2008 Survey of Income and Program Participation (SIPP) by James D. Bachmeier and Colin Hammar of Temple University and Jennifer Van Hook of The Pennsylvania State University, Population Research Institute.

those who are unauthorized, the figures are not directly comparable to the estimates used in the earlier portions of this profile.

Using this methodology, MPI estimates that among U.S. immigrants ages 16 and older, 42 percent were naturalized citizens. Of the approximately 24 million noncitizens, half were lawful permanent residents (LPRs) and 42 percent were unauthorized.¹¹ Within the unauthorized population, 14 percent—almost 1.5 million individuals—were potentially eligible to apply for protection from deportation and work authorization under the Deferred Action for Childhood Arrivals (DACA) program when it first launched in 2012, with tens of thousands more aging into eligibility since that time. Many have come forward to obtain these protections; according to U.S. Citizenship and Immigration Services (USCIS), more than 680,000 individuals had received DACA status as of June 2015.¹²

Relevance for WIOA Implementation: Immigration status is relevant to a variety of WIOA programs beyond the broad provisions described earlier that restrict unauthorized immigrants from accessing Title I services and the absence of status restrictions placed on Title II services. For example, under Title II a primary goal of the Integrated English Literacy and Civics Education program is to support immigrants in preparing for citizenship and full participation in the civic life of their community.¹³ And while all immigrants—regardless of immigration status—are eligible for AEFLA services, states that choose to braid Title I and II funds to provide integrated education and training services may inadvertently place Title II funds beyond the reach of unauthorized immigrants and/or create the need to implement complex new administrative procedures to assess the immigration status of recipients of adult education services.

Endnotes

- 1 See, for example, John Wachen, Davis Jenkins, Clive Belfield, and Michelle Van Noy with Amanda Richards and Kristen Kulongoski, *Contextualized College Transition Strategies for Adult Basic Skills Students: Learning from Washington State's I-BEST Program Model* (New York: The Community College Research Center, Teacher's College, Columbia University, 2012), 21-22, www.sbctc.ctc.edu/college/abepds/ibest_ccrc_report_december2012.pdf.
- 2 See the final section of this fact sheet for additional data and information on immigration status issues.
- 3 In addition, many unauthorized young adults are eligible for protection under the Deferred Action for Childhood Arrivals (DACA) program; DACA approval would allow them to qualify for WIOA Title I services, as opposed to strictly *Adult Education and Family Literacy Act*-funded services.
- 4 Limited English Proficient (LEP) refers to any person age 5 and older who reported speaking English less than "very well" as classified by the U.S. Census Bureau.
- 5 Individuals considered a priority for Title I adult employment and training services are "recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient." See *Workforce Investment and Opportunity Act*, Public Law 113-128, *U.S. Statutes at Large* 128 (2014) 1425, Title I Sec. 134 (c)(3)(E), www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf.
- 6 Social Policy Research Associates, *Program Year 2013 WIASRD Data Book* (Washington, DC: U.S. Department of Labor, Employment and Training Administration, Office of Performance and Technology, 2015), www.doleta.gov/performance/results/pdf/PY_2013_WIASRD_Data_Book.pdf.
- 7 Jeanne Batalova, Michael Fix, and Peter A. Creticos, *Uneven Progress: The Employment Pathways of Skilled Immigrants in the United States* (Washington, DC: Migration Policy Institute, 2008), www.migrationpolicy.org/research/uneven-progress-employment-pathways-skilled-immigrants-united-states.
- 8 See *Workforce Investment and Opportunity Act*, Title I Sec. 116(b)(2)(A)(i) for a description of the law's six accountability measures.
- 9 The federal poverty level (FPL), calculated based on total family income before taxes (excluding capital gains and noncash benefits such as food stamps), was \$23,834 for a family of four in 2013. For more information, see U.S. Census Bureau, "How the Bureau Measures Poverty," accessed November 23, 2015, www.census.gov/hhes/www/poverty/about/overview/measure.html.
- 10 For a detailed discussion of this methodology, see Randy Capps, Michael Fix, Jennifer Van Hook, and James D. Bachmeier, *A Demographic, Socioeconomic, and Health Coverage Profile of Unauthorized Immigrants in the United States* (Washington, DC: Migration Policy Institute, 2013), www.migrationpolicy.org/research/demographic-socioeconomic-and-health-coverage-profile-unauthorized-immigrants-united-states.
- 11 For more detailed MPI estimates of the unauthorized population in the United States prepared using this methodology at national, state, and top county levels, see MPI Data Hub, "Unauthorized Immigrant Population Profiles," accessed November 20, 2015, www.migrationpolicy.org/programs/us-immigration-policy-program-data-hub/unauthorized-immigrant-population-profiles.
- 12 U.S. Citizenship and Immigration Services (USCIS), "Number of 1-821D, Consideration of Deferred Action for Childhood Arrivals by Fiscal Year, Quarter, Intake, Biometrics and Case Status: 2012-2015 (June 30)," accessed November 20, 2015, www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/I821d-performancedata_fy2015_qtr3.pdf.
- 13 *Workforce Innovation and Opportunity Act*, Title II Sec. 203. (12).

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Margie McHugh is Director of the Migration Policy Institute's National Center on Immigrant Integration Policy. Her work focuses on education quality and access issues for immigrants and their children from early childhood through K-12 and adult, postsecondary and workforce skills programs. She also leads the Center's work seeking a more coordinated federal response to immigrant integration needs and impacts, and more workable systems for recognition of the education and work experience immigrants bring with them to the United States.

Prior to joining MPI, Ms. McHugh served for 15 years as Executive Director of The New York Immigration Coalition, an umbrella organization for over 150 groups in New York that uses research, policy development, and community mobilization efforts to achieve landmark integration policy and program initiatives. Prior to joining NYIC, Ms. McHugh served as Deputy Director of New York City's 1990 Census Project and as Executive Assistant to New York Mayor Ed Koch's chief of staff.

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Acknowledgments

The authors are grateful to MPI colleagues Jie Zong and Jeanne Batalova for their compilation of U.S. Census Bureau data used throughout this fact sheet.

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Cover Design: April Siruno, MPI
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Suggested citation: McHugh, Margie and Madeleine Morawski. 2015. *Immigrants and WIOA Services: Comparison of Sociodemographic Characteristics of Native- and Foreign-Born Adults in the United States*. Washington, DC: Migration Policy Institute.

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