



February 9, 2015

Ms. Cecilia Muñoz  
Assistant Secretary to the President and  
Director of the Domestic Policy Council  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

The Honorable Leon Rodriguez  
Director  
U.S. Citizenship and Immigration Services  
U.S. Department of Homeland Security  
20 Massachusetts Avenue NW, Suite 5110  
Washington, DC 20529

Dear Director Muñoz and Director Rodriguez:

CLASP is a national non-profit organization that works to improve the lives of low-income people through developing and advocating for federal, state and local policies that strengthen families and create pathways to education and work. CLASP has expertise in a wide range of anti-poverty federal programs, from child care to workforce development and safety net access, and we understand the impact these programs have on immigrant and refugee families. We recognize the importance of helping immigrants and refugees participate fully in their communities and our economy. Thank you for the opportunity to provide comments for the White House Task Force on New Americans' immigrant integration strategy.

U.S. policies have traditionally prioritized civic integration as the key strategy to help new immigrants and refugees. While civic integration is important and should continue to be a priority, multiple strategies including economic and linguistic integration efforts are necessary to realize the full potential and contributions of new Americans.

### **Promoting Immigrant Integration: Early Childhood Education (ECE)**

Children born to immigrant parents are a large segment of our nation's child population. The nearly 6 million young children of immigrants in the United States comprise approximately 25 percent of all children under the age of six. Virtually all of these children (95 percent) are U.S. citizens (See CLASP [data on children living in immigrant families](#)). Children of immigrants are more likely than children of U.S.- born citizens to

face economic hardships and significant barriers to healthy development, making them less ready to succeed in school and beyond. In recent years, a body of research has emerged showing that, overall, children of immigrants are less likely to participate in early education programs, such as pre-kindergarten, or formal child care arrangements, including center-based and family child care (See CLASP resource on [immigrant barriers to child care](#)).

Children of immigrants stand to gain significantly from high-quality early education experiences, receiving both the developmental benefits shown to exist for other at-risk groups and help immigrant children with school readiness and English language acquisition. For children of immigrants, early education has the potential to address issues of school readiness and English language acquisition, enabling them to enter elementary school with more advanced English skills and thus better preparing them to learn and to succeed. Early education may also ease integration for them and their families into American society and its education system. High-quality child care and early education opportunities will be critical to immigrant children's success in school and in life. Early education experiences may very well be the first link that immigrant families have into their communities and, if done well, provide a substantial opportunity for families to build on that experience to connect to other resources in the community (See resource on [policy opportunities](#)).

As a result of President Obama's recent executive action, many families with young children will be in the newly authorized immigrant population. It's important to think about the implications for child care and early education programs. Moreover, broad immigration integration efforts should bring together fields that are often disconnected from one another. For instance, immigrant and refugee-serving organizations often have limited contact with early childhood organizations at the state and local levels, despite the reality that many families with young children are using services provided by immigrant legal and social service providers. Partnerships and opportunities for shared learning could help bridge the information divide and encourage a broader group of actors to connect immigrant families with child care and early education opportunities.

### **Recommendations:**

- *Encourage increased investments in child care and early education to improve and expand access to high-quality services for young children. Increased investments would greatly benefit immigrant families who may not currently access publicly funded early childhood programs. When resources are insufficient, outreach is hard to reach populations rarely happens, and many immigrant families lack access to good information about available child care and early education options.*
- *Affordable, quality child care helps parents go to work and succeed on the job. Eligibility for federal child care assistance depends on the immigrant status of the child; yet, in practice many undocumented parents are fearful of accessing public*

*benefits. While recent executive action on work authorization does not necessarily expand the pool of children eligible for child care assistance (because most children are themselves legal immigrants or citizens), it may result in more parents of eligible children feeling comfortable coming forward to access child care assistance and other early childhood programs.*

- *The U.S. Department of Health and Human Services should provide guidance to state child care agencies and others on immigrant eligibility for child care to ensure that those administering state programs understand the eligibility rules and how they apply to children. HHS should use opportunities such as the new CCDBG reauthorization to encourage states to examine how their programs are working for immigrant families and to establish new partnerships with immigrant-serving agencies to expand the reach of child care services.*
- *The U.S. Department of Education should ensure that current guidance on immigrant eligibility for public schools is disseminated to state early childhood contacts, including administrators of pre-kindergarten programs, Race to the Top Early Learning Challenge grantees, State Early Childhood Advisory Councils, and others.*
- *Federal agencies should encourage dissemination of information about child care and early education programs—including child care assistance and Head Start—through other federal channels that reach immigrant-serving organizations. CLASP’s research finds that community-based immigrant- and refugee-serving organizations often lack information about child care and early education programs, which becomes a missed opportunity for connecting immigrant families to available services.*
- *The federal government—including the U.S. Department of Education and the U.S. Department of Health and Human Services— should provide guidance, technical assistance, oversight, and information on best practices in outreach to immigrant families and best practices in serving children of immigrants and dual language learners. This includes disseminating existing resources and research on dual language acquisition and ensuring that the early childhood field understands federal immigrant eligibility criteria.*
  - *Multiple federal technical assistance efforts (under Race to the Top Early Learning Challenge, Preschool Development Grants, Head Start, Child Care and Development Block Grant, and the Maternal and Infant Early Childhood Home Visitation (MIECHV) program) offer opportunities to disseminate research and best practices on outreach to immigrant families and on serving dual language learners.*
  - *Home visiting and Head Start in particular can be effective programs for connecting immigrant families with broader community resources. The*

*federal government could support local Head Start programs and home visiting models with enhanced guidance and technical assistance on meeting the needs of all immigrant communities.*

- *The Head Start Center on Cultural and Linguistic Responsiveness has an array of resources relevant to immigrant integration efforts that are not widely distributed or accessed outside of Head Start. The federal government should seek broader distribution of these resources to both the early childhood field and immigrant-serving agencies.*
- *Federal integration efforts should promote coordination and collaboration between the child care and early education community and the immigrant- and refugee-serving community at the federal, state, and local levels. The federal government can encourage State Early Childhood Advisory Councils and other coordinating bodies at the state level to ensure that the needs of immigrant families are embedded in statewide early childhood systems planning. Participation on advisory and coordinating bodies should include representatives of community-based organizations serving immigrant families as well as experts on second language acquisition.*

## **Promoting Immigrant Integration: Employment and Training**

A strong economic integration strategy is critical to the long-term success and contributions of immigrant and refugee families. Immigrant integration policies must include investments in employment and training opportunities that support individuals as they progress toward economic security.

The recent reauthorization of the nation's core workforce development program, the Workforce Innovation and Opportunities Act (WIOA), and the President's budget proposal to invest substantial resources in training through this program and others, coupled with the President's Executive Action, offer crucial opportunities to achieve these goals. In particular, the WIOA reauthorization redirects resources to low-income workers and those with barriers to employment, making clear that they are a priority for services (see CLASP's resources, [WIOA Game Plan for Low-Income People](#)). As explained more fully below, both lawfully present immigrants and others with work authorization (including through the President's Executive Actions) are eligible to be served under WIOA.

Furthermore, while many immigrant- and refugee-serving community based organizations (CBOs) and workforce development agencies share the goal of helping individuals enter the workforce, their efforts are not often connected to each other. Many immigrant- and refugee-serving organizations work to provide job search, education and training for job seekers. Immigrant and refugee CBOs may be better connected to the communities they serve, while workforce development agencies may have access to resources that CBOs may not. Collaborations between the two entities could contribute

to a better understanding of the needs of individuals and access to resources that will help secure employment and training.

**Recommendations:**

- *The Task Force should highlight programs and best practices across the country to inform policy and local efforts to help immigrant and refugees attain economic stability. One example of this is Washington State’s Basic Food Employment and Training (BFET) program that works with the state’s Office of Refugee and Immigrant Assistance to partner with CBOs serving immigrants and refugees who are receiving Basic Food Assistance to increase community integration and economic stability through employment and training programs.*
- *The Department of Labor, along with the Department of Health and Human Services, the Department of Education, and other agencies with a stake in implementing the employment and training provisions of WIOA, should develop and widely disseminate strong guidance explaining immigrant eligibility for WIOA services. This is especially important after the recent announcement of executive actions on immigration that expands the Deferred Action for Childhood Arrivals (DACA) and creates the new Deferred Action for Parents of Americans (DAPA), providing work authorization for potentially 5 million undocumented immigrants. Under the WIOA statute, work-authorized immigrants are eligible for all WIOA services (See section 188(a)(5) of WIOA providing that “participation in programs and activities or receiving funds under this title shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States.” See also, the Department of Labor’s, July 2014 TEGL 02-14, clarifying DACA for WIA and Wagner-Peyser Act Programs.), but many local and state programs and service providers, as well as immigrant-serving organizations, may not know that.*
  - *WIOA Title II – Adult Education and Family Literacy Act providers should be given guidance and resources to fully engage immigrants and refugees, including those who are participants in the DACA and DAPA programs.*
  - *Additionally, WIOA Title I providers should receive guidance on how to work collaboratively with their WIOA Title II providers and CBOs to share information about the DACA and DAPA programs and how this may have an impact on those they serve.*
  - *Several references throughout the law already direct states and local areas to focus more attention on the needs of immigrant communities and services impacting English language learners. For example, individuals*

*who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers are included in the new definition of “Individuals with Barriers to Employment.”*

*Additionally, low-income English language learners are specified in the eligibility for WIOA youth services, including out-of-school youth age 16 to 24 who have a secondary credential.*

- *Federal integration efforts should promote coordination and collaboration between the workforce development agencies and immigrant- and refugee-serving CBOs at the federal, state, and local levels. The federal government can encourage state workforce boards to ensure that the needs of immigrant workers are embedded in statewide workforce development planning. Participation on advisory and coordinating bodies should include representatives of CBOs serving immigrant workers.*

### **Promoting Immigrant Integration: Accurate Information About Access to Federal Programs**

Clarifying eligibility criteria is important even for programs that do not offer broad opportunities for immigrants, especially since stigma and misinformation can restrict access even more than the actual policy limits on the programs – notably in situations where some family members are eligible and some are not (See resources on [Web-Based Access to Benefits for Immigrants and Mixed Status Families](#)). These issues of stigma and misinformation are particularly associated with accessing governmental safety net and work support programs that help to support and lift families out of poverty. In mixed-status families, when some family members aren’t eligible for services and others are, the risk is that even eligible members will fail to gain access to resources available.

These issues are particularly important for children’s access to health insurance, food assistance, and child care assistance. For example, some immigrant parents may not be eligible for the Supplemental Nutrition Assistance Program (SNAP), but their U.S. citizen or lawful permanent resident children (LPR) may be. In many instances, families will forgo vital resources simply because they don’t understand their eligibility, they are fearful of misinformation around immigration consequences even if their children are eligible for services, or because of other barriers (See Urban Institute’s report on [Low-Income Immigrant Families’ Access to SNAP and TANF](#)). Access to safety net resources in the short term can provide the support families need to make ends meet while pursuing long term economic success and it is important that providers and families have accurate information on access and eligibility.

**Recommendation:**

- *The White House Task Force on New Americans should work with the relevant agencies (DHHS and USDA, at least) to develop and disseminate plain-language resources addressing eligibility and myths of key programs such as SNAP, Medicaid, child care assistance and Temporary Assistance for Needy Families (TANF). Technical assistance and outreach strategies to address barriers to access should include CBOs serving immigrant and refugee communities, as well as state agencies.*

We appreciate the opportunity to comment on strategies to better support and integrate new immigrants and refugees. We would be delighted to respond to any questions that you might have and hope the White House Task Force on New Americans will provide ongoing engagement opportunities for feedback on your efforts and share your integration plan once it is completed.

Sincerely,



Helly Lee  
Senior Policy Analyst