Improving Federal ECEC Policies and Programs for Immigrant-Background Children and Their Families

Recommendations for the Task Force on New Americans

MARCH 2023

BY MAKI PARK AND MARGIE MCHUGH

In late 2022, the Task Force on New Americans (TFNA) was launched pursuant to President Joe Biden's Executive Order 14012.[1] Led by the White House's Domestic Policy Council (DPC), the task force's mission is to strengthen and coordinate federal, state, and local efforts to support the integration and inclusion of immigrants and refugees. The Migration Policy Institute's National Center on Immigrant Integration Policy (NCIIP) has long argued for the need to create an office within the White House to analyze immigrant integration challenges and opportunities and identify ways the federal government can address them. The creation of the TFNA is a welcome development in this regard, and its efforts will hopefully model new and effective ways the federal government can build its capacities to understand and address integration issues that flow from the country's immigration policies.

Drawing from NCIIP's extensive record of research, policy analysis, and technical assistance for government entities, this document describes pressing issues related to federal early childhood education and care (ECEC) policies and programs and offers recommendations for how the task force can organize its work to address them. It is part of a broader set of recommendations for the TFNA that also covers topics such as K-12 education and can be found at **www.migrationpolicy.org/research/task-force-new-americans**.

Nearly one in four young children ages 0–5 in the United States lives in an immigrant family, and nearly one in three young children are Dual Language Learners (DLLs), meaning they live in households where a language other than English is spoken.[2] Immigrant and DLL families have long been underserved by early childhood systems, which continue to be slow in building capacities and skills to effectively serve their needs. With the crisis of unaffordable and unavailable child care across the country now a pervasive issue, these longstanding inequities are likely to become further entrenched in the absence of targeted action.

---

1   White House, "Executive Order on Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans" (executive order, February 2, 2021).

2   Migration Policy Institute (MPI), National Center on Immigrant Integration Policy (NCIIP), "U.S. Young Children (ages 0 to 5) by Dual Language Learner Status: National and State Sociodemographic and Family Profiles" (data tables, MPI, Washington, DC, 2021).

The following recommendations describe five key areas for action by the TFNA to improve equitable, high-quality early childhood services for young children of immigrants and DLLs:

▶ **Ensure that DLLs are systematically identified in early childhood programs.** Research shows that DLLs are less likely than their peers to be enrolled in early childhood programs, raising concerns about barriers to access. State and local early childhood systems, however, do not systematically identify DLLs and their language abilities, experiences, and needs. Without proper identification processes, early childhood systems cannot adapt to effectively and equitably support this large and growing segment of the U.S. young child population, which experiences significantly higher rates of poverty, linguistic isolation, and lower levels of parental formal education than non-DLL children. Major federal early childhood capacity-building initiatives, such as the Race to the Top Early Learning Challenge and the Preschool Development Grants program, also have not required or meaningfully included equity or quality measures for DLLs. The task force should engage with the Department of Health and Human Services (HHS) and the Department of Education to ensure that new and existing federal policies and funding measures involving early childhood services include a DLL identification requirement, appropriate assessment processes, and relevant metrics in program reporting. TFNA efforts should also engage agency teams in these departments that are involved in implementation of Biden's Executive Order 13985 on Advancing Racial Equity[3] and collaborate in exploring and making recommendations to address critical ECEC program equity, quality, and access issues these young children and their families face, via both the TFNA and Executive Order 13985 initiatives.

▶ **Promote equitable access to early childhood programs and child-care subsidies and resources provided by the Child Care and Development Fund (CCDF) and other programs by improving language access for families and providers.** With nearly half of all DLLs having at least one Limited English Proficient (LEP) parent,[4] language plays a critical role in facilitating or impeding access to early childhood programs. Similarly, for LEP early childhood workers who are well placed to effectively serve families who speak languages other than English, adequate language services are also important to support their entry and advancement in the field. However, many early childhood programs, and in particular the CCDF, lack the necessary data and accountability measures to advance and assure equitable access to services for LEP beneficiaries. The TFNA and HHS staff implementing Executive Order 13985 should explore and recommend approaches that will build language access considerations into regular reporting and evaluation mechanisms for CCDF and other early childhood programs such that they are required to provide evidence of compliance with language access requirements.

▶ **Provide support for family, friend, and neighbor (FFN) care to ensure that early childhood systems are inclusive of immigrant families' true needs and preferences.** The definition and indicators of "quality" in child care and other early learning programs are often culturally normative, which means that many program options may not reflect or meet the needs of DLL, immigrant, and other families from culturally and linguistically diverse backgrounds. Many existing child-care options are also unable to meet the specific care needs created by the nontraditional and inflexible

---

3   White House, "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government" (executive order, January 20, 2021).

4   MPI, NCIIP, "U.S. Young Children (ages 0 to 5) by Dual Language Learner Status."

working hours of many immigrant and LEP parents. As a result, a large proportion of immigrant and DLL families choose to opt out of formal child-care systems and programs that are not reflective of their lived reality or their cultural values and identities, and/or are unable to effectively communicate with families with a diverse range of backgrounds to build trust. Many instead rely on FFN care, which remains largely unsupported and is not sufficiently resourced, despite providing critically important culturally and linguistically appropriate care and other valuable benefits to this community. The TFNA should examine and provide recommendations for how federal supports for child care and early learning could include mechanisms to provide financial and other resources to FFN care providers and thereby advance equity and effectiveness in federal early childhood systems.

► **Develop realistic pathways to entry and advancement in the early childhood field for immigrant workers who bring valuable skills.** A culturally and linguistically competent workforce is foundational to providing equitable, high-quality services in early childhood programs. However, the existing cultural and linguistic skills in the formal early childhood workforce, most of which are provided by immigrant workers, risk being lost as efforts to professionalize and further credential the profession move forward. In comparison to K-12 teaching, the early childhood workforce is fairly racially and ethnically diverse, and this profession has historically been accessible to immigrant workers and benefitted from their skills. Yet many of those who work in early childhood systems also have lower levels of English proficiency and educational attainment, making traditional degrees and credentials challenging to obtain. As a result, foreign-born and LEP workers in the field are concentrated in lower-paid and lower-qualified tiers of the workforce. Amid a severe workforce shortage, efforts to create effective training and career ladders must take into account the existing workforce—both the value these workers bring as well as the substantial barriers they face to moving up traditional career ladders. In partnership with HHS, the TFNA should explore and provide recommendations for how accessible community-based pathways, apprenticeships, competency recognition, instruction in languages other than English, and other alternative opportunities for advancement can be meaningfully incorporated into career ladders for the early childhood workforce. Recognizing and rewarding the valuable skills and experience that these workers have long brought to the field is a critical issue on its own, and is doubly important given the urgent need to build the linguistic and cultural competencies of the ECEC workforce.

► **Make immigrant and DLL families visible in program data and ensure that Maternal, Infant, and Early Childhood Home Visiting (MIECHV) funds and programs equitably serve these populations.** Home visiting programs are an important vehicle to promote improved outcomes for DLLs and children of immigrants for several reasons. They can be especially effective in reaching hard-to-reach families who may otherwise be isolated, and can encourage parents who speak languages other than English to support their children's home-language development, maximizing their important role as their children's first teachers. However, research shows that DLLs and parents who speak languages other than English are underserved by the MIECHV program. Moreover, due to the scarcity of data collected by home visiting programs on immigrant or DLL specific indicators, administrators have no way to determine the extent to which immigrant families are being served by MIECHV funds. The HHS Home Visiting Evidence of Effectiveness (HomVEE) initiative also largely relies on studies that do not specifically address program models' efficacy for DLL or immigrant families (or

other minority populations). As a result, the extent to which these models are successfully reaching or supporting these populations cannot be determined. The TFNA should develop strategies for the equitable inclusion of immigrant- and DLL-relevant indicators in MIECHV statewide needs assessments to ensure equitable access for families of all backgrounds. The TFNA should also prioritize HomVEE efforts and calls for research that examine the efficacy and relevance of home visiting models for specific DLL and immigrant populations to promote culturally relevant services. To the extent that HHS officials may have identified and developed solutions for these needs as part of efforts to implement Executive Order 13985, a collaborative exploration of these issues and joined-up approaches for addressing them should take place.

Immigrant and DLL families have long been underserved by early childhood systems, which continue to be slow in building capacities and skills to effectively serve their needs. With the crisis of unaffordable and unavailable child care across the country now a pervasive issue, these longstanding inequities are likely to become further entrenched in the absence of targeted action.

Related Resources

The Migration Policy Institute's *Dual Language Learners: Key Characteristics and Considerations for Early Childhood Programs***.** This series of state-level fact sheets shares important characteristics of DLLs' families that should be considered in ECEC program and policy design and implementation, and particularly in efforts to address barriers that have led DLLs to enroll in such programs at lower rates than non-DLL children. Among other things, the fact sheets look at languages spoken, household income, parental education, and access to the internet and computers.

The Migration Policy Institute's *Overlooked but Essential: Language Access in Early Childhood Programs***.** This policy brief explores federal and state efforts to implement language access policies in major ECEC programs: the Child Care and Development Block Grant (CCDBG), the MIECHV program, Head Start, and state pre-kindergarten programs. It also discusses evidence of disparities in access to these programs and highlights opportunities to improve language access across early childhood services.

The Migration Policy Institute's *The Invisible Work of Family, Friend, and Neighbor Caregivers and Its Importance for Immigrant and Dual Language Learner Families***.** This policy brief discusses the importance of FFN care for immigrant and DLL families and the barriers FFN caregivers face in accessing public subsidies and other resources. It also highlights promising practices that can be expanded and replicated to effectively support immigrant FFN caregivers and the many families they serve.

The Migration Policy Institute's *Ending the Invisibility of Dual Language Learners in Early Childhood Systems: A Framework for DLL Identification***.** This issue brief sets out a framework of the most critical elements that should ideally be included in standardized, comprehensive DLL identification and tracking processes for early childhood systems. It also identifies foundational system components that would need to be in place to support the development and implementation of the framework.

U.S. Department of Health and Human Services and U.S. Department of Education's Joint Policy Statement on Supporting the Development of Children who are Dual Language Learners in Early Childhood Programs**.** This statement provides an overview of federal laws that apply to serving DLLs in early childhood programs as well as a review of the research on strategies that are effective in supporting their learning and development.

Supporting Immigrant Students in Federal K-12 Education Policies and Programs

Recommendations for the Task Force on New Americans

MARCH 2023

BY JULIE SUGARMAN, DELIA POMPA, AND MARGIE MCHUGH

In late 2022, the Task Force on New Americans (TFNA) was launched pursuant to President Joe Biden's Executive Order 14012.[1] Led by the White House's Domestic Policy Council (DPC), the task force's mission is to strengthen and coordinate federal, state, and local efforts to support the integration and inclusion of immigrants and refugees. The Migration Policy Institute's National Center on Immigrant Integration Policy (NCIIP) has long argued for the need to create an office within the White House to analyze immigrant integration challenges and opportunities, and identify ways the federal government can address them. The creation of the TFNA is a welcome development in this regard, and its efforts will hopefully model new and effective ways the federal government can build its capacities to understand and address integration issues that flow from the country's immigration policies.

Drawing from NCIIP's extensive record of research, policy analysis, and technical assistance for government entities, this document describes pressing issues related to the education of immigrant children and offers recommendations for how the task force can organize its work to address them. It is part of a broader set of recommendations for the TFNA that also covers topics such as early childhood and language access and can be found at **www.migrationpolicy.org/research/task-force-new-americans**.

Two realities drive federal policy supporting these students in the K-12 education system. First is the reality that most young immigrant children enter school with limited English proficiency. Indeed, the term English Learner (EL) is often a proxy for immigrant students in research, policy, and everyday practice. A second reality is that schools are a de facto integration center for immigrant families, ideally introducing them to U.S. culture and norms and bringing them into contact with integration resources such as adult education.

While U.S. schools function mainly under local and state jurisdiction, key protections for immigrant children are enshrined at the federal level[2] and, unfortunately, not always supported by local and state efforts. The

---

1   White House, "Executive Order on Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans" (executive order, February 2, 2021).

2   Julie Sugarman, *Legal Protections for K-12 English Learner and Immigrant-Background Students* (Washington, DC: Migration Policy Institute, 2019).

following recommendations for the task force would help strengthen schools' ability to equitably and effectively serve immigrant children and their families:

► **Fund federal programs to meet urgent needs.**

→ The president's next budget should reflect the growing population of ELs and immigrant students by funding grants authorized through Title III of the *Every Student Succeeds Act* (ESSA) at $2 billion. This reflects the need to make up for years of flat funding as well as to support pandemic recovery measures, such as extended learning time, that have been partially—and temporarily—covered under emergency recovery funds.

→ Schools should also be using federal programs outside Title III to support the specific needs of ELs and immigrant students. The Department of Education should issue guidance to states and local education agencies to prioritize use of ESSA Title I funds for English language development and ensure that Title I services are provided to ELs and their families on an equitable basis and are appropriate for and targeted to their needs.

→ The Department of Education should uplift the needs of ELs—including needs related to immigrant integration other than language learning—as competitive priorities, especially in grants related to teacher training. It should also ensure that new grants to expand digital access and digital learning meet the specific needs of immigrant families. As new research emerges, the department can disseminate best practices and resources from these federal efforts.

► **Target investments in whole-child supports and family engagement to immigrant student needs.**

→ Schools are increasingly implementing whole-child supports, including the community school model that brings together a variety of health and social service resources. Federal guidance for programs that fund such efforts and priorities for competitive grants should reflect the specific needs of immigrant families. These needs may include recovery from trauma that some experience due to war, violence, or during the immigration journey, and the challenges of reunification for families that have lived in different countries for years.

→ Additionally, the federal government must continue to monitor compliance with language access requirements for parents and families set out in civil rights law. As was highlighted when schools struggled to communicate with families during the COVID-19 pandemic, for parents to be partners in their children's education, they need information in a language and format that is accessible to them.

→ The TFNA is well placed to investigate the coordination of support provided by the Office of Refugee Resettlement (ORR) and schools, and to provide guidance and best practices on coordinating refugee and asylee services and school services. Specifically, school personnel are eager to better understand what services ORR provides during and after custody to the students who are placed in their communities, so that services can be coordinated rather than duplicated.

→ Federal efforts to invest in family engagement programs must ensure that they address the unique needs of ELs' families. Programs should emphasize a wide range of services such as helping immigrant families increase their digital literacy as well as gain systems knowledge to help them navigate the myriad services available to them and their children.

▶ **Expand support for bilingualism and biliteracy.**

→ Advocates have in recent years made a compelling case to strengthen the Office of English Language Acquisition (OELA) by returning to that office the administration of Title III state grants and technical assistance and giving it the broader mission to serve all multilingual learners, not just those identified as ELs. As this process moves forward, the reconstituted OELA should be resourced to support the broad range of needs felt by students and families under this umbrella, including cultural orientation and helping families understand their rights and responsibilities.

→ The most direct way for the Department of Education to support bilingualism and biliteracy would be to develop competitive grants to create and expand dual language programs from pre-kindergarten through grade 12. While these programs hold great promise for improving multilingual learners' achievement, the administration can also continue to support programs that serve speakers of less commonly spoken languages (for example, through programs supporting teaching and learning of languages critical to national interests).

→ The federal accountability system requires states to consider the use of native language assessments,[3] but few states have a robust set of such assessments in multiple languages and academic subjects. The Department of Education should make development of native language assessments a priority in Competitive Grants for State Assessments. In addition, OELA should make efforts to understand how native language assessments can be included in accountability systems by convening a group of experts to raise up issues and solutions.

▶ **Address the unique needs of newcomer students.**

→ Pending reauthorization of ESSA, the department should consider alternative supplemental funding to support the steady arrival of new immigrant students. The nature of immigration to the United States ensures the presence of newcomer students in every grade every year. These students require more intensive and often different attention than other ELs. Unfortunately, the timing and calculation of Title III immigrant funding is neither timely enough to truly support what are often sudden increases in the population nor consistent enough to support long-term services and planning for newcomer needs.

→ OELA should provide guidance and best practice examples for serving immigrant students who enter U.S. schools at the high school level, as these students face the extra challenges of meeting graduation requirements while learning a new language, and often while engaging in full- or part-time employment.

---

3   Julie Sugarman and Leslie Villegas, *Native Language Assessments for K-12 English Learners: Policy Considerations and State Practices* (Washington, DC: Migration Policy Institute, 2020).

▶ **Improve inclusion of immigrant students in data and knowledge management systems.**

→ Information about EL and immigrant students is not easily accessed by parents, educators, or policymakers. As the Equitable Data Working Group convened by the Biden administration reported, the ability to ensure equity in educational opportunity relies on the use of data to identify and remove barriers.[4] As that committee's recommendations focused on the use of disaggregated data, the Department of Education should monitor state report cards and data dashboards for compliance with requirements to publish information on EL students. To improve the utility of EL data, the department should also provide guidance on how to contextualize data on dashboards.[5] For example, graduation rates for EL students can provide different kinds of information depending on whether they reflect the rates for students who were ELs any time in high school or only those labeled ELs in their last year of enrollment.

→ Practitioners and advocates are increasingly interested in analyzing data for recent immigrant students separately from all ELs. OELA can provide leadership in this arena by encouraging states to publish the count of recent immigrant students, a data point they collect for Title III federal reporting, and convening an expert panel to make recommendations on how to improve and expand efforts to collect, report, and use data on subsets of students, including recent immigrants and students with limited or interrupted formal education.

→ States also collect information on ELs for biennial reporting to the federal government that is not required to be reported on state report cards or data dashboards. The Department of Education should encourage states to include information such as the progress of ELs with disabilities and the number of long-term ELs along with other public data reporting.

→ School-age children with at least one parent born in Mexico account for 40 percent of all immigrant-background children, and 92 percent of these children are U.S. born and thus citizens.[6] These families often migrate back and forth between the two countries. OELA should sponsor research addressing strategies to support the effective reintegration of these children into schools in both countries.

→ Every year, states and other agencies expend duplicative energy gathering information about education in other countries to help U.S. teachers support their newcomer students. The Department of Education should collaborate with counterparts in other countries to centralize this work and help U.S. schools understand other education systems, including such broad factors as curriculum, assessment, and teacher training as well as specific practices such as evaluating transcripts.

---

4   The White House, "The Release of the Equitable Data Working Group Report" (press release, April 22, 2022).

5   Julie Sugarman, *Which English Learners Count When? Understanding State EL Subgroup Definitions in ESSA Reporting* (Washington, DC: Migration Policy Institute, 2020).

6   Julie Sugarman, "From *Plyler* to Sanctuary: U.S. Policy on Public School Access and Implications for Educators of Transnational Students," in *The Students We Share: Preparing US and Mexican Educators for Our Transnational Future*, eds. Patricia Gándara and Bryant Jensen (Albany, NY: SUNY Press, 2021), 223–48.

Related Resources

The Migration Policy Institute's *Legal Protections for K-12 English Learner and Immigrant-Background Students*. This issue brief lays out seven key ways the U.S. government protects the educational rights of EL and immigrant-background students, including those with Limited English Proficient and unauthorized-immigrant family members. It also explains the legal framework behind these rules, who enforces them, and how they can be seen in action in schools across the country.

The U.S. Department of Education's *Educational Resources for Immigrants, Refugees, Asylees and other New Americans*. This collection includes fact sheets, legal guidance, and information for families as well as links to department resources for ELs, the Migrant Education Program, and the Office of Civil Rights.

The Migration Policy Institute's *Funding English Learner Education: Making the Most of Policy and Budget Levers*. This issue brief provides an overview of policy and budget mechanisms relevant to EL education and how they can be applied to increase the adequacy and equity of funding for EL and immigrant students.

Supporting Immigrant Integration via Adult Education and Workforce Development Programs
Recommendations for the Task Force on New Americans

BY JACOB HOFSTETTER AND MARGIE MCHUGH

In late 2022, the Task Force on New Americans (TFNA) was launched pursuant to President Joe Biden's Executive Order 14012.[1] Led by the White House's Domestic Policy Council (DPC), the task force's mission is to strengthen and coordinate federal, state, and local efforts to support the integration and inclusion of immigrants and refugees. The Migration Policy Institute's National Center on Immigrant Integration Policy (NCIIP) has long argued for the need to create an office within the White House to analyze immigrant integration challenges and opportunities and identify ways the federal government can address them. The creation of the TFNA is a welcome development in this regard, and its efforts will hopefully model new and effective ways the federal government can build its capacities to understand and address integration issues that flow from the country's immigration policies.

> *Adult skills programs, which encompass programs managed primarily by the adult education and workforce development systems, provide many critical services that directly aid the integration of immigrants, including English courses, civic classes, and workforce preparation and training activities.*

Drawing from NCIIP's extensive record of research, policy analysis, and technical assistance for government entities, this document describes pressing issues related to adult skills programs and offers recommendations for how the task force can address them. It is part of a broader set of recommendations for the TFNA that also covers topics such as K-12 education and language access and can be found at **www.migrationpolicy.org/research/task-force-new-americans**.

Adult skills programs, which encompass programs managed primarily by the adult education and workforce development systems, provide many critical services that directly aid the integration of immigrants, including English courses, civic classes, and workforce preparation and training activities. Despite their crucial role, persistent challenges limit the potential of these systems at the federal, state, and local levels to effectively support immigrants' integration and economic mobility. Addressing these challenges requires federal policymakers and agency leaders to both recognize the demographic transformation that has occurred in the

---

1   White House, "Executive Order on Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans" (executive order, February 2, 2021).

country's adult learner and worker populations in recent decades due to high rates of immigration and to strategically reorient policies governing these systems and their program designs to better reflect the needs of their intended users, a disproportionate share of whom are now immigrant adults.

The following recommendations are offered to support the task force's deliberations on how to address challenges in this critically important arena:

► **The TFNA should model improved federal governance approaches for adult skills and economic integration via its own structure, consultation processes, and record of deliberations and recommendations on these issues.** With knowledge and responsibility for adult skills and economic integration issues residing in multiple federal agencies, the TFNA's exploration of these issues should be organized to tap system experts in the Departments of Education (ED), Labor (DOL), and Health and Human Services (HHS)—and beyond, as feasible—and their key state and local partners. Given the lack of research regarding the effectiveness and relevance of federal program designs in meeting the skill development and broader economic integration needs of key subpopulations of immigrants, agency teams should systematically survey their state and local agency partners and other experts to collect information on challenges and opportunities experienced in meeting community needs and recommendations for building necessary system capacities. Compilation of a public report that provides results from these surveys and recommendations for federal agency efforts in response to issues raised should be a key task force deliverable by the end of 2023. In light of the overlapping goals and mission of agency efforts to implement Executive Order 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, agency leads for those efforts should be consulted or directly participate in these TFNA efforts.[2]

► **The TFNA should produce policy and program recommendations reflecting concrete strategies to expand access to adult skills programs that support successful integration trajectories and address the needs of key subpopulations of adult learners and workers.** While modeling and conducting the type of inter- and intra-agency review processes necessary to fulfill the TFNA's charge, the task force should also consider a range of measures to strengthen federal policy and program designs in this arena, along with service access and reach. These include:

→ **Expanding resources for adult education programs that promote immigrant integration.** English language acquisition programs funded by Title II of the *Workforce Innovation and Opportunity Act* (WIOA) and managed by adult education providers meet less than 5 percent of the need for adult English language learning in the country.[3] With 95 percent of those with a learning need not served by existing programs, the TFNA—in collaboration with the Department of Education and the Office of Career, Technical, and Adult Education (OCTAE)—should analyze and make recommendations on new approaches to meet the learning needs

---

2   White House, "Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government" (executive order, January 20, 2021).

3   Margie McHugh and Catrina Doxsee, *English Plus Integration: An Instructional Paradigm for Immigrant Adult Learners to Support Integration* (Washington, DC: Migration Policy Institute, 2018).

of a far larger share of the target service population. This should include proposals to increase investments in existing service models, including those that respond to specific integration or employment-focused needs. The president's annual budget, congressional appropriations, and any future reauthorization of WIOA should all be targets for such TFNA recommendations. Other approaches should also be considered: for example, programs that provide integration information, service planning, and system navigation support can provide an on-ramp into existing services and better prepare adult learners for successful skill-building trajectories. Expanding programs that support independent or semi-independent learning should also be considered—including zone models that can provide conversation groups, coaching sessions, and/or support in addressing integration challenges on a flexible basis to adults with diverse learning needs and interests.

→ **Improving immigrants' access to workforce development system services.** Governed under WIOA Title I, local workforce development boards manage the delivery of workforce preparation and training activities across the country via one-stop American Job Centers and other programs. Immigrants and refugees often struggle to access these services due to a lack of awareness of their availability, prerequisites for participation (such as advanced proficiency in English), and a lack of language access to system services. These challenges persist despite WIOA designating individuals who have limited proficiency in English as a "priority of service" population. The TFNA should engage with the Labor Department to develop approaches that significantly reduce the barriers to workforce services that LEP individuals face and ensure fidelity in implementation of the law's service priority for basic skills deficient individuals. As part of such efforts, the Labor Department should develop and issue guidance and policies to support serving greater numbers of immigrants via WIOA Title I, including foreign-trained professionals affected by skill underutilization.

→ **Leveraging demographic data reflecting key relevant characteristics of immigrant adult learners and workers to improve the design of adult skills programs.** Educational and workforce development programs aiming to support the integration of immigrant adults cannot employ a one-size-fits-all approach. For example, significant shares of immigrants have low levels of formal education and little to no proficiency in English, while others have graduate degrees or professional certifications from their countries of origin but can lack professional level English, specific coursework, or experience other barriers to obtaining professional licenses in the United States. Properly orienting and resourcing adult skills programs will require the use of publicly available data, such as Census data, to better understand the size of immigrant populations in different regions as well as their levels of formal education, English proficiency, and other relevant characteristics. To support this work, the task force and the Departments of Education and Labor should analyze and make recommendations for how available data can be better leveraged to estimate needs for educational and training services among local subpopulations, including those with basic skill deficiencies as defined under WIOA. The task force should also make recommendations for how these data can be better utilized in WIOA planning and review processes at the

federal and state levels to promote more equitable access to existing educational and training programs for key subpopulations of adult learners and workers.

→ **Examining how education and training programs can better measure integration and how communities can build more effective integration-service ecosystems.** The primary outcomes the federal government uses to measure successful immigrant integration are gains in English proficiency (measured by standardized testing), employment, and naturalization. Strictly focusing on such measures overlooks many critical markers of social and economic integration and limits the government's ability to understand other interventions that promote successful integration. As part of TFNA's efforts, the Education Department should provide thought leadership and consult with field leaders, experts, and service providers to better understand policy and program interventions—such as the use of navigators or short-term integration programs—that may be particularly successful in promoting integration. Building off the Network for Integrating New Americans initiative sponsored by OCTAE several years ago, the task force should also examine how the federal government can encourage the development of state and local networks or "integration zones" among local systems and community organizations to better support immigrants' integration.[4]

→ **Drawing lessons from existing integration programs to guide the development of expanded or future efforts.** The Integrated English Literacy and Civics Education (IELCE) program, which was established under WIOA and is overseen by OCTAE, is the primary educational and training program funded by the federal government that is intended to directly support the combined economic, linguistic, and civic integration of immigrant adults. Due to its design and requirements under WIOA, the program has faced implementation and accessibility challenges, but it has also led to the development of many innovative models for integration programs. The lessons from IELCE have not been widely considered or diffused at a national level, despite their relevance to any efforts to develop new integration programs—and especially those intending to pair workforce development services with English and integration instruction. The task force should also seek to learn from IELCE's successes by engaging with OCTAE's Enhancing Access for Refugee and New Americans (EARN) project and innovative IELCE programs on the local level as models for how federal funds can support integration.

→ **Examining weaknesses in data used to measure performance of adult education and skills programs and provide recommendations for improvement.** WIOA's performance measures can provide a disincentive for adult education and workforce development programs to serve adults with multiple challenges—many of whom are immigrants who may have low levels of English proficiency or low or very low levels of formal education. Creating a fair basis for comparison of the performance of WIOA programs across states is intended to be supported via a Statistical Adjustment Model (SAM), which states should be able to use to renegotiate their performance targets based on the characteristics of who they are serving.

---

4   For more information on the Network for Integrating New Americans initiative, see the announcement of the Network from the White House, the project's theoretical framework, and this repository of resources from the project from World Education.

In theory, the SAM should allow WIOA programs to receive credit and relaxed performance measures for serving those most in need. However, the implementation of the SAM has been largely ineffective at even capturing—much less serving as a tool to ameliorate—the inequities that WIOA's performance measures can trigger. The TFNA, perhaps consulting with those tasked with implementing Executive Order 13985 at the Departments of Labor and Education, should place a special focus on examining the SAM's shortcomings and provide recommendations that would allow it to be more effective in promoting equity in WIOA programming. Concurrently, the TFNA and relevant leaders at the Departments of Education and Labor should explore new tools and mechanisms that can leverage population- and program-level data to improve the delivery of adult skill services to immigrants facing the greatest challenges to their economic mobility.

→ **Ensuring equitable and effective adult education program designs for immigrant parents with young or elementary-school-age children.** WIOA's workforce-centered performance measures for adult education programs have led to a decline in parent-focused programs that previously played a major role in supporting the integration of immigrant parents and helped them prepare their children for kindergarten entry and future school success. Custodial parents not seeking to work outside the home can be extremely risky for federally funded programs to serve since four of the six performance measures mandated under WIOA measure program participants' employment-related outcomes, which parents who are fulltime caregivers and not employed cannot meet. Yet WIOA specifically includes parents as a key target for adult education services, making this an urgent disconnect for the task force to explore and develop solutions to correct. As the pandemic-induced shift to remote education demonstrated, the unmet learning needs of parents can have serious impacts on the academic success of their children. Immigrant parents are more likely to face these barriers than U.S.-born parents, making this an important equity issue that should be considered in collaboration with agency teams making recommendations under Executive Order 13985.[5] The TFNA should explore and advance new program models to meet these needs as well as reforms to WIOA's design. With regard to the former, HHS should identify ways to expand two-generation program models that address the child development and kindergarten readiness concerns of immigrant parents through services for young children while also introducing the parents to local service ecosystems that can support their own education and skill attainment goals. Among other efforts, the Education Department's Office of Elementary and Secondary Education can better resource and consider expanding existing requirements for provision of parent-focused programming for parents who are LEP and/or have low levels of formal education. Regarding constraints imposed by WIOA's accountability measures, the TFNA should work with the Education Department's senior leadership, including at OCTAE, to promote reforms to WIOA's Title II, such as exempting custodial parents of young and elementary-school-age children enrolled in adult education programs from the law's employment-focused measures. The department should also require state WIOA plans to adopt stronger data-driven approaches to ensure parents who are LEP and/or have lower levels of formal education experience equitable access to adult education services. Federal

---

5   Jacob Hofstetter and Margie McHugh, *Immigrant and U.S.-Born Parents of Young and Elementary-School-Age Children: Key Sociodemographic Characteristics* (Washington, DC: Migration Policy Institute, 2021).

approaches that make individuals with less than nine or five years of formal education, or with none at all, visible in program data and accountability measures should also be considered to improve equity in parent-focused programming.

→ **Expanding assistance for immigrant and refugee youth to support their educational and career trajectories.** Young immigrants such as Dreamers and recently arrived youth often require educational and workforce development support to ensure they can integrate into American society and achieve economic mobility over the course of their careers. However, high schools, postsecondary institutions, workforce development providers, and adult education programs too often lack the capacities to address the specific needs of this population, particularly youth who have recently arrived in the United States and are of working age. The TFNA should analyze weaknesses across these system elements and provide recommendations to address them, while also considering strategies to build networks and support service ecosystems that can address the unique needs of this population.

→ **Strengthening research and policies to assist foreign-trained professionals affected by skill underutilization.** Despite having advanced levels of education or professional skills obtained abroad, millions of immigrants continue to be underemployed in low-skilled jobs. This phenomenon, also known as brain waste, imposes significant economic costs on both foreign-trained professionals (in terms of forgone income) as well as the communities and states in which they live (in terms of both their economies' not benefitting from those immigrants' skills and lost tax revenues). The TFNA should examine research-informed policies and practices that can assist these immigrant professionals in moving into higher-skilled employment. As part of this work, the TFNA should engage with those at the Labor Department who are implementing the *Bridging the Gap for New Americans Act* and consider how to also make career pathways accessible to all immigrants.

Related Migration Policy Institute Resources

English Plus Integration: An Instructional Paradigm for Immigrant Adult Learners to Support Integration.
This policy brief outlines the negative impacts the implementation of WIOA has had on the ability of adult education programs to promote the integration of immigrants. The brief includes recommendations for a new programmatic approach—English Plus Integration—that the federal government along with states and localities could leverage to better support the integration trajectories of immigrants and their families.

The IELCE Program: Understanding Its Design and Challenges in Meeting Immigrant Learners' Needs.
This report describes the purpose and design of the IELCE program—the primary educational and training program supported by the federal government whose stated intention is to promote the civic, linguistic, and economic integration of immigrant adults. Although the IELCE program offers important models for promoting the economic integration of immigrants, its implementation also demonstrates the challenges related to accessibility, practicality, and relevance that can result from not ensuring flexibility and equity in integration programs' design.

Improving Language Access in Federal Programs

Recommendations for the Task Force on New Americans

BY JACOB HOFSTETTER AND MARGIE MCHUGH

In late 2022, the Task Force on New Americans (TFNA) was launched pursuant to President Biden's Executive Order 14012.[1] Led by the White House's Domestic Policy Council (DPC), the task force's mission is to strengthen and coordinate federal, state, and local efforts to support the integration and inclusion of immigrants and refugees. The Migration Policy Institute's National Center on Immigrant Integration Policy (NCIIP) has long argued for the need to create an office within the White House to analyze immigrant integration challenges and opportunities and identify ways the federal government can address them. The creation of the TFNA is a welcome development in this regard, and its efforts will hopefully model new and effective ways the federal government can build its capacities to understand and address integration issues that flow from the country's immigration policies.

Drawing from NCIIP's extensive record of research, policy analysis, and technical assistance for government entities, this document describes pressing issues related to language access in federal programs and offers recommendations for how the task force can organize its work to address them. It is part of a broader set of recommendations for the TFNA that also covers topics such as workforce and adult education and can be found at **www.migrationpolicy.org/research/task-force-new-americans**.

Federal civil rights regulations guarantee all individuals in the United States the right to meaningful access federally funded services, regardless of their level of English proficiency. This right to language access applies both to programs managed directly by the federal government as well as services such as education, health care, and social services that receive federal funds but are delivered by state and local governments or nongovernmental organizations. Hindering access to these services for those who do not speak English fluently undermines the effectiveness of public programs, limits the government's ability to communicate with the public, and can create public health and safety risks for immigrant communities and the general public.

> *Despite decades of work at the federal, state, and local levels, the removal of language barriers ... is still a distant goal, rather than a reality.*

Despite decades of work at the federal, state, and local levels, the removal of language barriers—that is, achieving "language access" for those interacting with federal agencies and programs they fund—is still a distant goal, rather than a reality. Given the outsized importance of this issue in improving the efficacy and

---

accessibility of all federally funded services, TFNA efforts to examine and improve federal policies and management approaches in this arena must—and hopefully will—provide a solid foundation for the success of other agency-level task force efforts.

The following recommendations are offered to support the task force's deliberations on how to address challenges in this critically important arena:

► **The TFNA should organize itself in a way that allows a multidimensional review of factors that have thwarted efforts to ensure language access in federal programming—both programs delivered through state and local governments and nongovernmental organizations, and those provided at the federal agency level.** This review should lead to the compilation of recommendations for new approaches designed to both overcome these challenges and ensure their effective implementation and ongoing evaluation. The review's multiple dimensions should include: 1) the responsibilities, system design, and capacity-building needs of individual federal agencies; 2) corresponding needs for federal cross-agency coordination, accountability, and technical support; and 3) processes and structures for ongoing consultation and collaboration with the executive branches of state and local governments.

Diligent efforts on the part of the U.S. Department of Justice (DOJ)'s Federal Coordination and Compliance Section (FCS) and several agency-level Offices of Civil Rights (OCRs) notwithstanding, federal agency responses to the challenges of ensuring language access in federal programming have proven too weak and poorly designed to be effective. The TFNA should organize its efforts to analyze and address these shortcomings, including through new cross-agency coordination and oversight efforts that can be undertaken by entities such as the DPC, Office of Management and Budget (OMB), and the DOJ. This work by the TFNA should place an especially sharp focus on strategies to improve language access in federally funded services administered by state and local recipients given their impact, reach, and the complexity of ensuring compliance across so many types of systems, programs, and providers. To do so, the TFNA should:

  → Direct federal agencies covered by Executive Order 14012 to analyze and report to the DPC on the successes and failures that they and their state/local counterparts experience in eliminating language barriers to the programs and services they administer. Well-targeted strategies and tactics to address challenges would ideally be put forward by agency teams working on TFNA efforts as well as a team within TFNA examining these issues from a cross-agency perspective.

  → Consult with governors, mayors, and county executives implementing language access programs to identify opportunities for collaboration and capacity-building supports that can extend the value and effectiveness of existing language access measures while also planning for implementation of more coherent and effective system designs emerging from TFNA efforts.

▶ **The TFNA should produce policy and programmatic recommendations that lay out concrete strategies to improve access to federal programs for Limited English Proficient (LEP) individuals via improved coordination across the federal government and expanded efforts to ensure compliance by recipients of federal funding.** While modeling and conducting the type of multidimensional review necessary to take account of the range of challenges that thwart meaningful compliance with federal language access requirements, the task force should also consider a range of efforts that may be useful within the more coherent system design it proposes, including:

→ **Issuance of specific, standardized guidance on how to provide language access to services by major public-facing federal programs**. Currently, all federal agencies have issued their own "LEP guidance" based on DOJ's original guidance from 2002. Though an important tool, LEP guidance documents are intended for entire agency and not tailored to reflect the design and service sector of each major federal program, such as individual public assistance programs. Major public-facing federal programs should be required to issue their own LEP guidance and/or technical assistance documents that detail how providers can comply with language access obligations. Once the TFNA's analysis and recommendations for broader improvements in design and governance of language access are completed, the task force should ensure that agency OCRs, agency leadership, and offices administering major public-facing programs work to initiate and coordinate the issuance of such guidance and other tools to model compliance for state and local recipients of federal funding.

→ **Incorporation of language access into agency funding, reporting, and review processes.** Language access is a civil rights obligation, yet recipients of federal funding are generally not required to provide evidence of compliance or plans for how they will serve LEP individuals. Embedding language access planning and evaluation into programs' regular processes and reviews would spur greater transparency regarding compliance with federal requirements. Thus, the TFNA's multidimensional review should specifically explore how language access can be incorporated in a more robust way into key aspects of major program operations, such as creation and review of state plans, grant application processes, program reporting requirements, and evaluation measures. The TFNA's multidimensional deliberations should also specifically engage with OMB to examine the extent to which federal funding and grantmaking processes could better embed budgeting and planning for language access needs.

→ **Expanded reach and scale of accountability mechanisms.** Given that there is no private right-of-action for language-access-related civil rights violations, the most common avenue of redress for LEP individuals is filing an administrative complaint with an agency OCR. These complaints can lead to investigations and resolutions that aim to bring recipients of federal funding into compliance, but OCRs lack resources to conduct such investigations in anything remotely commensurate with the scale of need for them. The TFNA's deliberations should include work with the DPC, DOJ, agency OCRs, and other experts to consider additional or expanded accountability measures that are sustainable and can advance language access in all federal programs, especially those delivered primarily by state and local recipients.

→ **Direct support for state and local language access services.** Over the past two decades, many state and local governments have undertaken efforts to expand access to their services for LEP individuals. This work often suffers from a lack of resources to cover costs of language assistance services such as interpreting and translation of written materials—particularly those for low-incidence languages spoken by smaller populations of refugees. The TFNA should provide recommendations for how the federal government can better support such services, especially those for recently arrived refugees and other populations admitted under federal parole and humanitarian guidelines. In addition, the TFNA should explore the possibility of the federal government negotiating language services contracts that would aggregate demand for them across federally funded programs in a state or region and obtain lower unit pricing; this would allow federal programs to then purchase language services they need at lower prices than they could negotiate on their own.

→ **Improved provision of data on English proficiency and languages spoken in states and localities.** The superdiverse nature of local populations across the United States means that all agencies and nongovernmental organizations involved in delivering federally funded information and services require accurate and timely data in order to understand and address language access needs in the communities they serve. While some useful data related to existing and emerging language groups are available via the U.S. Census Bureau's American Community Survey, its specificity is limited on the crucial questions of languages spoken and how close to the local level data can be provided. The TFNA should consult with experts to explore data sources that can be leveraged by the federal government to create and share more accurate data on language diversity and LEP communities, including the needs of recently admitted immigrants and refugees. The TFNA should also explore promising data practices from the state level, such as those in Washington State,[2] as it considers federal solutions.

▶ **Finally, the TFNA should create and make publicly available a detailed record of its consultations and deliberations on these issues.** In order for the thousands of state and local stakeholders working in this arena to benefit from information gathered in the course of TFNA efforts, the task force should create and make available a detailed record of all of the challenges and opportunities articulated to it during its multidimensional review, its deliberations and data or other resources that informed them, and recommendations put forth by state and local government partners as well as agency and cross-agency teams.

---

2   Christy Hoff and Erica Gardner, "An Innovative Model for Generating Limited English Proficient Population Estimates," Migration Policy Institute, accessed February 3, 2023.

Related Resources

The Migration Policy Institute's Language Access: Translation and Interpretation Policies and Practices. This webpage offers practical resources for government administrators, policymakers, and others looking for ways to provide high-quality and cost-effective translation and interpretation services, as well as research on a variety of language access issues at the federal, state, and local levels.

The U.S. Department of Justice's Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons. This 2002 guidance established the model for agencies' versions of their own LEP guidance and lays out recommendations on how recipients of federal funding from the DOJ can ensure compliance with Title VI requirements to provide language access. Similar versions of this guidance exist for all major federal agencies.

The Migration Policy Institute's *A Framework for Language Access: Key Features of U.S. State and Local Language Access Laws and Policies*. This report provides a novel framework detailing the most common features of state and local language access laws and policies. In addition to providing an overview of how many states and localities seek to ensure language access in their services, this report also contains an important repository of states, counties, cities, and towns with dedicated programs and policies related to language access.

The federal government's LEP.gov. This webpage, which is managed by the Federal Coordination and Compliance Section (FCS) of the DOJ, contains an array of resources related to language access, including federal laws and regulations, agencies' language access plans and LEP guidance, along with links to relevant items for specific policy areas such as education, housing, and law enforcement.

Improving Data Collection and Research Related to Immigrant Integration

Recommendations for the Task Force on New Americans

MARCH 2023

BY MARGIE MCHUGH, MICHAEL FIX, JEANNE BATALOVA, AND VALERIE LACARTE

In late 2022, the Task Force on New Americans (TFNA) was launched pursuant to President Joe Biden's Executive Order 14012.[1] Led by the White House's Domestic Policy Council (DPC), the task force's mission is to strengthen and coordinate federal, state, and local efforts to support the integration and inclusion of immigrants and refugees. The Migration Policy Institute's National Center on Immigrant Integration Policy (NCIIP) has long argued for the need to create an office within the White House to analyze immigrant integration challenges and opportunities and identify ways the federal government can address them. The creation of the TFNA is a welcome development in this regard, and its efforts will hopefully model new and effective ways the federal government can build its capacities to understand and address integration issues that flow from the country's immigration policies.

Drawing from NCIIP's extensive record of research, policy analysis, and technical assistance for government entities, this document describes pressing issues related to data collection and research on immigrant integration that exist across the federal government. It is part of a broader set of recommendations for the TFNA that also covers topics such as language access and can be found at **www.migrationpolicy.org/research/task-force-new-americans**.

Government programs at the national, state, and local level rely on data collected by the federal government. These data are used to inform the strategies and priorities of policymakers and government agencies and are regularly incorporated into myriad processes connected to the delivery of public services at all levels of government. The demographic transformation that high levels of immigration has brought about in the country's population over the previous 50 years, however, also requires the federal government to review and update its practices related to the collection of data in federal programs and via the Census. For the topic of immigrant integration, more effective data are particularly essential to help government agencies, institutions, systems, and programs understand the share that immigrants comprise of populations targeted for service and how to best serve those communities. In addition, more high-quality population- and program-level data are also necessary to support agencies' efforts to ensure that immigrants are equitably served in the programs for which they are eligible.

---

1   White House, "Executive Order on Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans" (executive order, February 2, 2021).

The following recommendations are offered to support the task force's deliberations on how to address challenges in this critically important arena:

▶ **The TFNA should systematically tap into the knowledge stores and recommendations of other DPC and agency-level teams working to implement executive orders promulgated by Biden that seek to improve equity, relevance, and/or quality of federal agency programs for underserved communities, including through better collection and dissemination of data.** With DPC and agency experts already working for well over a year to implement several executive orders whose efforts directly overlap or are adjacent to those of the TFNA, consolidating inputs, research, deliberations, and recommendations across the TFNA and these executive orders will more efficiently use federal resources and maximize the impact of efforts associated with each. In particular, TFNA efforts should be integrated with those related to:

→ **Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.**[2] This executive order aims to address inequities in executive departments and agencies that present barriers to opportunities for underserved communities. TFNA should consult with the Office of Management and Budget (OMB) assessment of equitable policies across agencies to deepen the task force's understandings of how agency policies may be affecting the integration trajectories of racially and ethnically diverse immigrant populations. The task force should also tap into agency-level teams tasked with implementing this executive order to collaborate in mapping significant areas of mission and population overlap and produce recommendations that fully reflect issues and concerns related to immigrant-background populations.

→ **The Equitable Data Working Group.**[3] Pursuant to provisions in Executive Order 13985 and chaired by executive branch officials from the Office of Science and Technology Policy and OMB, the Equitable Data Working Group is conducting rigorous assessments on how data collection methods can be improved to better capture demographic data on underserved communities, which in turn can be used for evidence-building equity efforts. The TFNA should coordinate with the Equitable Data Working Group to both share and acquire insight into best practices, strategies, and methodologies for improving the collection and dissemination of high-quality data, and to collaborate in strengthening and harmonizing recommendations emanating from the TFNA and this working group.

→ **White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders (WHIAANHPI).**[4] Pursuant to Executive Order 14031, this initiative has developed a robust plan to advance equity, justice, and opportunity for Asian American, Native Hawaiian, and Pacific Islander communities that highlights the need for improved data collection and usage. In collaboration with the Equitable Data Working Group, WHIAANHPI is assessing how disaggregated data can be better collected and utilized at federal, state, and local levels

---

2   White House, "Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government" (executive order, January 20, 2021).
3   White House, "The Release of the Equitable Data Working Group Report" (press release, April 22, 2022).
4   White House, *National Strategy to Advance Equity, Justice, and Opportunity for Asian American, Native Hawaiian, and Pacific Islander Communities* (Washington, DC: White House, 2023).

to inform policy and program design and strengthen outcomes for these communities. Senior White House officials and agency experts coordinating WHIAANHPI's work should be incorporated in TFNA issue exploration and decision-making processes.

▶ **The TFNA should explore and provide recommendations for improvements in Census Bureau data collection, dissemination of existing data, and expanded use of Census data in federal program designs in order to better understand and improve equity and responsiveness of programs for immigrants and their children.** This exploration should utilize the following approach:

→ **TFNA efforts should focus on actions the Census Bureau can take to significantly expand public provision of disaggregated and cross-tabulated data that are pertinent to advancing access and equity in key federal programs.** The Census Bureau has a great deal of data on key socioeconomic characteristics of individuals that should be shared in an appropriately disaggregated manner with government and community stakeholders in order to support improvements in the responsiveness of federal programs to those they are intended to serve, including immigrants and their children. Actions the Census Bureau should take include:

o *Expanding public provision of data related to attainment of a high school diploma or equivalent to include educational attainment of: less than nine years, less than five years, and zero (no formal education).* With many federal antipoverty, education, and economic advancement programs using the lack of high school completion as an indicator for service eligibility, and immigrants disproportionately likely to have very low or no formal education as compared to native-born individuals, providing easy access to data that disaggregate lower levels of formal educational attainment would allow federally funded programs to better understand and incorporate into program designs the needs of individuals with lower levels of formal education.

o *Expanding public provision of data related to Limited English Proficient (LEP) adults to include measures for those answering that they speak English "well," "not well," and "not at all."* Migration Policy Institute (MPI) research indicates that the service and programming needs of respondents saying they speak English "not well" or "not at all" often differ from those who report speaking English "well," even though all are considered to be LEP.[5] Yet when English proficiency data are leveraged in federal programs, they generally only refer to the larger LEP population. The English proficiency of potential service populations is an important factor in nearly all federal program designs and in calculating certain federal funding streams. Providing easy access to Census data indicating the levels of proficiency for those who report speaking English less than very well would greatly aid efforts by federal agencies and their state/local partners to both comply with federal requirements to remove language barriers to federal programming and to ensure equitable access to language

---

5   Jeanne Batalova and Michael Fix, *Through an Immigrant Lens: PIAAC Assessment of the Competencies of Adults in the United States* (Washington, DC: MPI, 2015).

learning supports for those with different levels of proficiency. Such provision of data could include annual publications by the Census Bureau in coordination with other agencies or the Justice Department detailing this data proactively for the state and county level.

    o   *Increasing public provision of data tables that cross-tabulate poverty with other key characteristics such as LEP status, educational attainment, linguistic isolation, health insurance coverage, and digital access challenges, including by race/ethnicity subgroups.* Cross-tabulations of Census data should be coordinated with agencies and major public facing programs to determine what characteristics would be most powerful in ensuring more equitable access to the services these entities deliver.

→ **Agency-level TFNA efforts should analyze and provide recommendations on actions to incorporate disaggregated data in their federal program operations, including via state plans submitted as a condition for receiving federal program funds, federal and state grant programs, and program reporting requirements.** Many federal antipoverty, education, and economic advancement programs rely on legacy designs rooted in the 1960s war on poverty era that have not been updated to reflect the demographic transformation of the country's population in recent decades. This has left key federal programs with blind spots that can result in inequities in service access and quality for individuals as well as inequities for service providers who attempt to serve those with higher needs. These, in turn, can significantly erode the overall impact and success of federal program designs. To address these issues, TFNA efforts at the DPC and agency levels should weave the use of the following data into agency program design and operations:

    o   Disaggregated educational attainment data (high school diploma or equivalent, less than nine years, less than five years, zero formal education) in place of high school completion data points;

    o   Disaggregated LEP data (speaks English well, not well, not at all); and

    o   Cross-tabulated data pertinent to program goals and populations intended to be served.

→ **To track integration outcomes of new immigrants and the barriers they face, the Census Bureau should reinstate a version of the New Immigrant Survey (NIS).**[6] NIS was a nationally representative, multicohort longitudinal study of new legal immigrants and their children admitted for U.S. permanent residence. The survey sample was based on nationally representative samples of the administrative records, compiled by the Immigration and Naturalization Service (INS). The questionnaires covered a wide range of indicators of integration and inclusion, including employment, health, income and assets, housing, and intention to naturalize. It also included information about immigrants' pathways to the United States and pre-migration experiences (e.g., prior occupation, place of education, place of

6   Data Sharing for Demographic Research (DSDR) Project, "New Immigrant Survey Series," accessed February 28, 2022.

residence, work experience). The new NIS could focus on a cohort of new arrivals (and their children) regardless of their legal status. This approach would bring two benefits. First, the survey's results would provide up-to-date, comprehensive information about current arrivals to the United States. Second, expanding data collection to new immigrants regardless of their status would reflect the complexity and variety of legal and permanent or temporary statuses of today's immigrants, which have a significant impact on their future integration prospects. Importantly, the survey should also track the outcomes of the same individuals over time, given that integration is not a one-time experience. From the start, the Census Bureau could design this survey so it can be linked to the agency's existing surveys and thus focus only on the questions not covered by those other surveys.

→ **The TFNA should review and consider the recommendations proposed in the National Academy of Sciences report *The Integration of Immigrants into American Society*.**[7] Undertaken by a committee of experts appointed by the National Research Committee and sponsored by the Carnegie Corporation of New York, Department of Homeland Security (DHS), National Science Foundation, and the Russell Sage Foundation, this study sought to facilitate a fact-based discussion around U.S. immigration issues, including by highlighting gaps in existing knowledge and data collection. The TFNA should particularly consider the following recommendations from the report[8] related to data and research:

   o The Census Bureau should add a question on the birthplace of parents to the American Community Survey (ACS).

   o The National Institutes of Health should offer continuing support for population health surveys. It should ensure that these surveys contain questions on date and age of arrival, time spent in the United States, and whenever possible and practical, legal status.

   o U.S. Immigration and Citizenship Services (USCIS) and the DHS Office of Immigration Statistics should make more administrative data available to researchers and the public. Sensitive data should be made available to Secure Data Centers.

   o The Census Bureau and USCIS should create a system that links administrative data to Census Bureau-administered surveys, including the Decennial Census, the ACS, and the Survey of Income and Program Participation, following protocols that have recently been used to link Internal Revenue Service data to Census Bureau data and/or following protocols developed for the American Opportunity Study.

▶ **The TFNA should embed data and research considerations into all of the topic and policy areas its work focuses on.** In particular, the task force should incorporate the following research and data recommendations into its work connected to language access, early childhood education and care, K-12 education, and adult skills and workforce development services for immigrants:

7   National Academies of Sciences, Engineering, and Medicine, *The Integration of Immigrants into American Society* (Washington, DC: National Academies Press, 2015).

8   National Academies, *The Integration of Immigrants into American Society*, 429–33.

→ **Improve provision of data on English proficiency and languages spoken in states and localities to better promote language access in government services.** The TFNA should consult with experts to explore data sources that can be leveraged by the federal government to create and share more accurate data on language diversity and LEP communities, including newly arriving immigrants and refugees, to assist efforts by federal agencies as well as state and local governments to provide these communities with better access to services.

→ **Ensure that Dual Language Learners (DLLs) are systematically identified in early childhood programs.** Major federal early childhood capacity-building initiatives such as the Race to the Top Early Learning Challenge and the Preschool Development Grants program have not required or meaningfully included equity or quality measures for DLLs (young children who live in households where a language other than English is spoken). The task force should engage with the Department of Health and Human Services (HHS) and the Department of Education (ED) to ensure that new and existing federal policies and funding measures involving early childhood services include a DLL identification requirement and relevant metrics in program reporting.

→ **Make immigrant and DLL families visible in program data and ensure that Maternal, Infant, and Early Childhood Home Visiting (MIECHV) funds and programs equitably serve these populations.** The TFNA should develop strategies for the equitable inclusion of immigrant- and DLL-relevant indicators in MIECHV statewide needs assessments to ensure equitable access for families of diverse backgrounds. The TFNA should also prioritize Home Visiting Evidence of Effectiveness (HomVEE) efforts and calls for research that examine the efficacy and relevance of home visiting models for specific DLL and immigrant populations to promote culturally relevant services. To the extent that HHS officials may have identified and developed solutions for these needs as part of efforts to implement Executive Order 13985, a collaborative exploration of these issues and joined-up approaches for addressing them should take place.

→ **Improve inclusion of immigrant-background students in data and knowledge management systems used in K-12 education.** Parents, educators, and policymakers need accessible and actionable data in order to improve equity for immigrant-background children, many of whom are English Learners (ELs). ED should monitor state report cards and data dashboards for compliance with requirements to publish information on ELs. To improve the utility of EL data, the department should also provide guidance on how to contextualize data on dashboards. Additionally, practitioners and advocates are increasingly interested in analyzing data for recent immigrant students separately from all ELs in order to ensure schools are meeting their unique educational needs. The Office of English Language Acquisition (OELA) can provide leadership in this arena by encouraging states to publish the count of recent immigrant students, a data point it collects for federal reporting, and convening an expert panel to make recommendations on how to improve and expand efforts to collect, report, and use data on subsets of students, including recent immigrants and students with limited or interrupted formal education. States should also publish information on ELs they already collect for biennial reporting to the federal government that is not required to be

reported on state report cards or data dashboards. ED should encourage states to include information such as the progress of ELs with disabilities and the number of long-term ELs along with other data reporting.

→ **Engage with federal agencies to design evidence-based adult skills programming and policies that are inclusive of immigrant populations and promote their integration.** There is a lack of research and evidence regarding the effectiveness and relevance of federal program designs in meeting immigrants' skill development and broader economic integration needs. With knowledge and responsibility for adult skills and economic integration issues residing in multiple federal agencies, the TFNA's exploration of how to build an evidence base for improving existing policies and programming should be organized to tap system experts in ED, HHS, the Department of Labor (DOL), and their key partners in state adult skills systems.

→ **Take immigrants into account in research and evidence-building efforts in adult skills systems.** One in every six adults and workers in the United States is an immigrant,[9] yet evaluations of adult educational and workforce development programs frequently do not account for the success of programmatic models in serving native-born versus immigrant individuals. In shaping future research in the adult skills space, the TFNA should engage with ED and DOL to push federal research activities—including those directed by outside contractors—and those conducted by states to consider nativity as a key factor in evaluating the success and relevance of new and existing service approaches and programs.

→ **Leverage data to measure the performance of adult skills programs and provide more equitable access to services for immigrants.** The *Workforce Innovation and Opportunity Act* (WIOA), which governs workforce development and adult education systems, uses performance measures that often disincentive serving at-need individuals with lower levels of formal education and English proficiency, who are disproportionately immigrants. This impact should be lessened by a Statistical Adjustment Model (SAM), which states should be able to use to adjust performance targets based on the characteristics of who their programs are serving. However, the implementation of the SAM has been largely ineffective at even capturing—much less serving as a tool to ameliorate—the inequities that WIOA's performance measures can trigger. The TFNA should provide recommendations that would allow the SAM to be more effective in promoting equity in WIOA programming while also engaging with relevant leaders at ED and DOL to explore new tools and mechanisms that can leverage population- and program-level data to improve the delivery of adult skill services to immigrants facing the greatest economic mobility challenges.

---

9   Migration Policy Institute (MPI) tabulation of 2015–19 pooled data from the U.S. Census Bureau's annual American Community Survey (ACS).

Related Resources
The National Academy of Sciences' *The Integration of Immigrants into American Society*. This 2015 report was developed by a committee of experts appointed by the National Research Committee and sponsored by the Carnegie Corporation of New York, Department of Homeland Security, National Science Foundation, and the Russell Sage Foundation. The study sought to facilitate a fact-based discussion around U.S. immigration issues, including by highlighting gaps in existing knowledge and data collection.
The Census Bureau's *New Immigrant Survey* *(NIS)*. NIS was a nationally representative, multi-cohort longitudinal study of new legal immigrants and their children admitted for U.S. permanent residence. The survey sample was based on nationally representative samples of the administrative records, compiled by the Immigration and Naturalization Service (INS). The questionnaires covered a wide range of indicators of integration and inclusion, including employment, health, income and assets, housing, and intention to naturalize, but it also included information about immigrants' pathways to the United States and pre-migration experiences (e.g., prior occupation, place of education, place of residence, work experience).

This set of recommendations was prepared by Margie McHugh, Director of the Migration Policy Institute (MPI) National Center on Immigrant Integration Policy (NCIIP); Michael Fix, MPI Senior Fellow; Jeanne Batalova, MPI Senior Policy Analyst and Manager of the Migration Data Hub; and Valerie Lacarte, Senior Policy Analyst.

For more information on NCIIP's work, visit the MPI website at www.migrationpolicy.org/integration or contact MPI at info@migrationpolicy.org.