

MISSING IN ACTION

JOB-DRIVEN EDUCATIONAL
PATHWAYS FOR UNAUTHORIZED
YOUTH AND ADULTS

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FEBRUARY 2015



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ACKNOWLEDGMENTS

This research was funded by the Ford Foundation and WKF Family Fund.

We thank them for their support but acknowledge that the findings and conclusions presented in this report are those of the authors alone, and do not necessarily reflect the opinions of the foundations.

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INTRODUCTION

There are an estimated 11.4 million unauthorized immigrants in the United States, representing more than 1 out of every 4 immigrants overall. Immigration policies aimed at deferring action on deportations – and even more so, those aimed at creating a path to citizenship – have tremendous economic potential for individuals and the nation as a whole. Without immigrants, the United States workforce will not be sufficient to replace the workers expected to retire from the labor force between 2010 and 2030.¹ The absence of immigrants in the workforce could impede the nation's ability to maintain current productivity, let alone to foster economic growth and opportunity.

Policymakers in Washington, DC, and in the states have put forward proposals to make it easier for immigrants to fully contribute to the economy. Most federal immigration policy proposals – whether administrative or congressional – require immigrant applicants to attain credentials, thus facilitating their full economic integration. These educational requirements – if supported by adequate policy infrastructure and investments – increase the likelihood of positive economic outcomes for individual immigrants and our economy as a whole. It is well-documented that higher levels of education are associated with higher earnings and economic productivity. But some of these credential requirements have not lined up with what the labor market actually demands, and to date, no policy has included the investments or infrastructure needed to support job-driven educational pathways for unauthorized youth and adults:

- The DREAM Act, which would provide an avenue to citizenship for certain youth and young adults, does not include middle-skill occupational training as an educational pathway. Industry recognized middle-skill certificates are an important pathway into the labor market for many immigrant youth, and are in great demand by employers.
- Twenty percent (426,000) of those who were otherwise potentially eligible for work authorization under President Obama's original Deferred Action for Childhood Arrivals (DACA) program, enacted in 2012, did not meet the educational requirements because they lacked a high school diploma and were not enrolled in school.² Without the work authorization granted by DACA, these young people are ineligible for the primary federally

Federal immigration policy has tremendous economic potential. But to realize that potential, these policies must support job-driven training leading to middle-skill credentials, and policymakers must address the infrastructure and investments necessary for the policies to succeed.

funded occupational training program, the Workforce Innovation and Opportunity Act (WIOA) Title I, which, when blended with Title II (Adult Education and Family Literacy Act) funds, can help out-of-school youth and adults improve their basic skills and English in the context of occupational training.

- For those who *do* qualify for WIOA Title I services, including those adults impacted by the President's recent Deferred Action for Parents of Americans and Lawful Permanent Residents (DAPA), significant underfunding of these programs constrains the potential economic impact of DACA and DAPA for individuals and the nation as a whole.

In short, federal immigration policy has tremendous economic potential. But to realize that potential, these policies must support job-driven training leading to middle-skill credentials, and policymakers must address the infrastructure and investments necessary for the policies to succeed.

Over the longer term, the same capacity and infrastructure issues that make it challenging for DACA and DAPA participants to pursue job-driven educational pathways could also become barriers to these participants' ability to attain U.S. citizenship if comprehensive immigration reform legislation passes. The Border Security, Economic Opportunity, and Immigration Modernization Act (S.744) passed by the Senate in 2013 will likely serve as a model for any eventual comprehensive legislation. That bill established a thirteen-year pathway to earned citizenship, which included a number of benchmarks related to employment, earnings, education, and English language acquisition.

Reflecting on the DREAM Act, DAPA, and DACA today creates an opportunity to ensure that the current lack of access to job-driven educational pathways does not become a barrier to citizenship in

the future when comprehensive immigration reform comes to pass. What's more, with the impending implementation of the newly reauthorized WIOA, now is a particularly important time for the workforce development and immigrant integration communities to proactively engage in conversations with each other and with local, state, and federal policymakers about creating job-driven educational pathways for a significant and essential segment of America's current and future workforce: unauthorized youth and adults.

THE DREAM ACT: A JOURNEY TO CITIZENSHIP WITHOUT JOB-DRIVEN EDUCATIONAL PATHWAYS

With a legislative history going back more than a decade, the Development, Relief, and Education for Alien Minors Act (DREAM Act), would create an avenue to citizenship for a certain set of unauthorized youth and young adults. While provisions of that pathway have changed in iterations of the bill over the last 13 years, the legislation has generally required young people to have a high school diploma or equivalent, and be enrolled in or have completed a two- or four-year degree or military service. Versions of the DREAM Act, which have generally garnered bi-partisan support, have been incorporated into comprehensive immigration reform bills including most recently in the 2013 Senate-passed S. 744.

Under the 2010 version of the DREAM Act, 1.9 million unauthorized youth and young adults would be eligible under the non-educational requirements: age, time in the U.S., and age at arrival. But only 38 percent (755,000) of these 1.9 million individuals had achieved the additional higher education or military service requirements that would be necessary to access the DREAM Act's path to citizenship. Only 4 percent (78,000) of the 1.9 million had completed an associate's degree or higher (Table 1).³ This means that in 2010, based on the pending DREAM Act, fully 1.1 million youth and young adults would have needed to pursue a two-year or four-year degree or military service to meet the bill's requirements.

Unfortunately, the DREAM Act does not include middle-skill occupational training as an allowable educational pathway. There are a number of industry recognized middle-skill certificates obtained through occupational training programs that can lead to good employment. Many of these certificates allow people to obtain jobs with good wages – jobs that are crucial to all of our lives (Table 2).

As such, the DREAM Act's provisions are not job-driven – that is, they do not reflect the educational outcomes demanded by the labor market. Eighty percent of job openings over the next decade will require a postsecondary credential, and the largest portion (nearly half) will require a middle-skill credential (Table 3). Key industries are unable to find enough sufficiently trained workers to fill these jobs, which require more than a high school diploma but not a four-year degree. In 2012, middle-skill jobs accounted for 54 percent of

TABLE 1. THE DREAM ACT UNIVERSE

Under the 2010 version of the DREAM Act, over one million youth and young adults would have needed to pursue postsecondary education or military service to meet the bill's requirements.

- 1.9 million meet baseline age, time in the U.S., and age of arrival requirements
- 755,000 also meet higher education or military requirements
- 78,000 have completed an associate's degree or higher

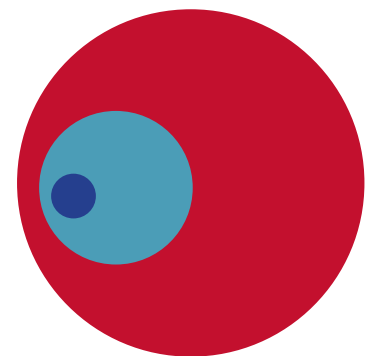


TABLE 2. MIDDLE-SKILL CERTIFICATES: CAN'T LIVE WITHOUT THEM

There are a number of industry recognized certificates obtained through occupational training programs that can lead to good employment. Many of these certificates allow people to obtain jobs with good wages – jobs that are crucial to all of our lives.

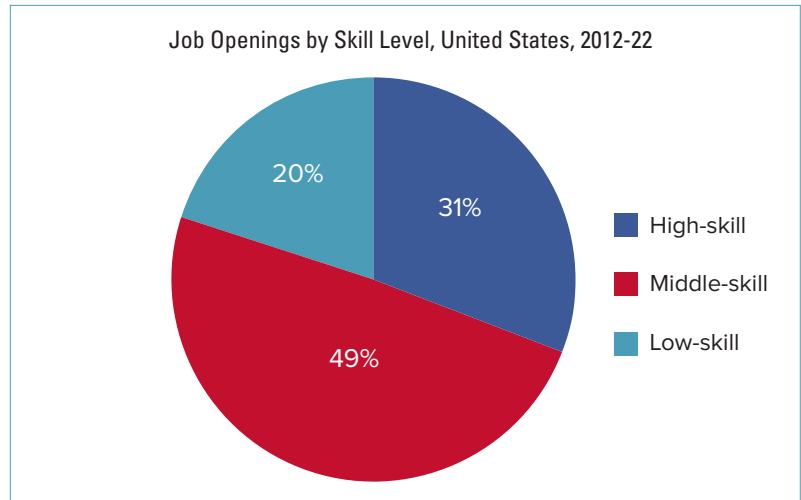
Source: Bureau of Labor Statistics Employment Projections. Typical entry needed for example occupations is postsecondary non-degree credential.

OCCUPATION	JOB OPENINGS 2012-22 (in thousands)	MEDIAN ANNUAL WAGE
Licensed practical nurses	363.1	\$41,540
Heating, air conditioning, and refrigeration mechanics and installers	123.7	\$43,640
Aircraft mechanics and service technicians	35.6	\$55,210
Heavy and tractor-trailer truck drivers	464.7	\$38,200

TABLE 3. DEMAND FOR MIDDLE-SKILL JOBS WILL REMAIN STRONG

Between 2012-2022, 49 percent of job openings nationwide will be middle-skill.

Source: NSC analysis of long-term occupational projections from Bureau of Labor Statistics.



the U.S. labor market, but only 44 percent of the country’s workers were trained to the middle-skill level (Table 4).⁴

The absence of middle-skill occupational training as an allowable educational pathway limits the DREAM Act’s potential to help address the middle-skill gap in the labor market, and it also limits the Act’s economic payoff for individuals. Middle-skill certificates offer a pathway to gainful employment and further postsecondary education for many individuals. Those with a middle-skill certificate earn 20 percent more than those with a high school diploma.

Individuals who work in the field of their credential often earn more than the median holder of an associate’s degree and can earn as much or more as the median bachelor’s degree holder. The wage premium for a middle-skill certificate is particularly high for Hispanic workers (Table 5).⁵

The inclusion of educational requirements in the DREAM Act increases the likelihood of positive economic outcomes for individuals and the economy. But these positive outcomes are constrained because middle-skill occupational training is not an allowable

TABLE 4. A MIDDLE-SKILL GAP

Middle-skill jobs account for 54 percent of United States' labor market, but only 44 percent of the country's workers are trained to the middle-skill level.

Source: NSC analysis of BLS Occupational Employment Statistics by State, May 2012 and ACS data, 2012

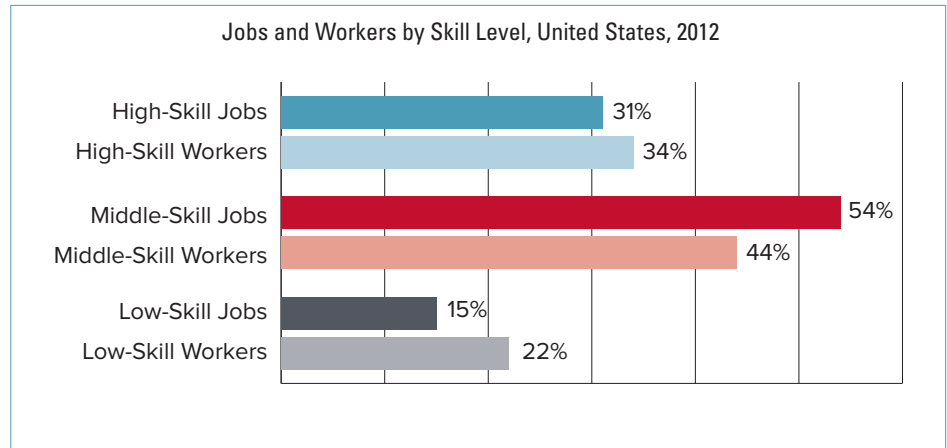
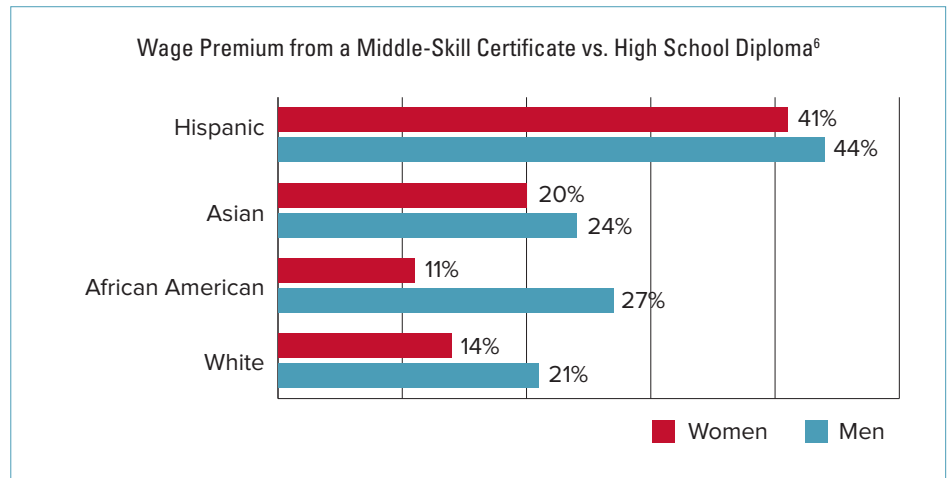


TABLE 5. MIDDLE-SKILL CERTIFICATES PAY

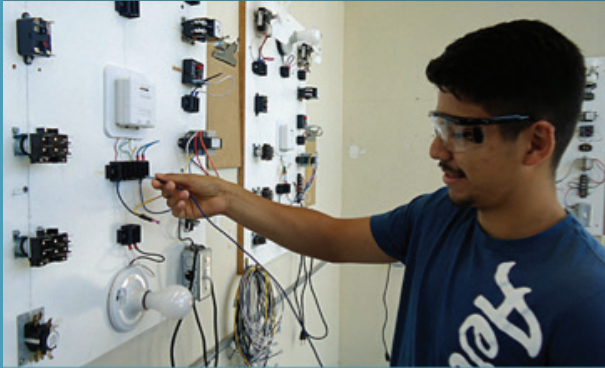
The wage premium from a middle-skill certificate compared to a high school diploma is particularly significant for Hispanic workers.

Source: Anthony P. Carnevale, Stephen J. Rose and Andrew R. Hanson. Certificates: Gateway to Gainful Employment and College Degrees.



educational pathway. While the specific examples vary by region, local economies are being held back because of a shortage of individuals with relevant middle-skill credentials in certain key industries. For example, a recent analysis found that there is a high demand for individuals with middle-skill credentials in Houston's petrochemical and commercial/industrial construction industries. In New York City, the healthcare and technology industries are being held back by a shortage of individuals with industry recognized middle-skill credentials.⁷

The lack of a middle-skill occupational training pathway in the DREAM Act is not only out of step with economic trends, it is also out of step with the direction of recent federal policy – both congressional and administrative – which is increasingly recognizing the need to focus on closing the middle-skill gap and to support the types of learning models that make it easier for individuals to stack credentials and build competencies over time.



DREAMS OF A MIDDLE PATHWAY: SAMUEL

Samuel came to the U.S. from Mexico as a young boy in 1999. Family economic hardships prevented him from finishing high school, but he seized other opportunities. Samuel earned his GED and enrolled in a nationally accredited HVAC technician training program at the Center for Employment Training in Sacramento. He will soon be prepared for a high-growth family-sustaining job that is essential to his community. While Samuel's middle-skill credential will have economic payoff for him and his employer, it is not recognized as a valid educational outcome within the DREAM Act.

DEFERRED ACTION FOR CHILDHOOD ARRIVALS (DACA) AND DEFERRED ACTION FOR PARENTS (DAPA): JOB-DRIVEN EDUCATIONAL PATHWAYS WITHOUT CAPACITY, INVESTMENTS

In 2012, following a breakdown in negotiations over the DREAM Act, President Obama took administrative steps to defer action on deportation for the population of youth and young adults targeted by the DREAM Act. The Deferred Action for Childhood Arrivals (DACA) program allows youth and young adults who meet its requirements

to obtain temporary reprieve from deportation, work authorization, and lawful presence under federal immigration law. DACA is a temporary administrative program and does not provide a pathway to legal permanent residency or citizenship, both of which require congressional action. As of July 2014, more than 580,000 individuals had received deportation relief and work authorization under DACA.⁸

In November 2014, the President took further administrative action, expanding the pool of individuals eligible for deferred action on deportation and work authorization to nearly half of the 11.4 million individuals in the unauthorized population – an estimated 5.2 million people. The President's action brought an additional 290,000 young people into the pool of immediately eligible DACA youth by eliminating the age cutoff (previously applicants had to be under age 31) and adjusting the U.S. residency requirement from 2007 to 2010. This action expands the number of immediately eligible youth to approximately 1.5 million. The President also announced a new program, Deferred Action for Parents of Americans and Lawful Permanent Residents (DAPA), which would allow approximately 3.7 million parents of United States citizens or legal permanent residents to apply for deferred action on deportation and work authorization for a three-year period.⁹

Both the DACA and DAPA programs have elements in common with the DREAM Act proposal, and elements that are different. DACA mirrors the non-educational criteria in the DREAM Act, but its educational criteria are significantly broader. An individual must have served in the military or have a high school diploma or GED or must be currently in school. The in-school requirement is notably broad and includes "an education, literacy, or career training program (including vocational training) that is designed to lead to placement in postsecondary education, job training, or employment" or "an education program assisting students either in obtaining a regular high school diploma or its recognized equivalent." In contrast, the newer DAPA program does not include any educational criteria.

The DACA Catch-22: Out of School Youth and Young Adults without a Diploma or GED

DACA's broad education requirements allow more individuals to qualify for DACA than would have qualified for the DREAM Act.

In particular, DACA has the potential to reach those who do not have a high school diploma or GED, as long as they are enrolled in an adult education or occupational training program leading to a GED or high school diploma, or leading to placement in postsecondary education/training or employment. By recognizing middle-skill occupational training as a valid educational pathway, DACA is more job-driven and has the potential for greater economic payoff than the DREAM Act.

However, the intersection between DACA's programmatic structure and the structure of the primary federal program that supports these expanded educational pathways creates a barrier for close to half a million youth and young adults who do not currently meet DACA's educational requirements.

According to the Migration Policy Institute, approximately 1.2 million young people met all of DACA's criteria at the time of launch in 2012. A majority of these individuals, 856,000, had secured a high school diploma or GED. An additional 426,000 individuals met DACA's age-at-arrival and length of residency criteria but did not meet educational criteria – they did not have a high school diploma and were not enrolled in school. Over two-thirds of these individuals had limited English proficiency.¹⁰ The President's 2014 expansion of DACA has increased the pool of immediately eligible individuals to 1.5 million.

How best to move potentially eligible DACA youth who do not have a diploma and are not in school onto a job-driven educational pathway? Recent practice and research suggest that the most effective way to move individuals without a GED or with low reading, math or English language skills toward a credential with labor market value is through integrated training models that combine instruction in basic reading and math skills and/or English with occupational training.

One such integrated model is Washington State's I-BEST program. A Columbia University evaluation found that I-BEST students are 56 percent more likely than standard adult basic education and ESL students to earn college credit, and 26 percent more likely to earn a certificate or degree.¹¹ An earlier evaluation by Public/Private Ventures found that a set of sector-focused community-based training programs showed significant positive outcomes for workers, including earnings gains, steadier employment, and increased access to health care and other benefits compared to programs that

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did not use a sector-focused model. One commonality of all the programs evaluated was the provision of integrated training, including technical job-specific training and support to strengthen English and basic math skills.¹²

These types of integrated programs typically require a blending of federal funding streams, particularly those under the Workforce Innovation and Opportunity Act (WIOA). As described above, WIOA is the primary federal program that supports the types of job-driven educational pathways that would allow individuals without a high school diploma or GED to meet DACA's in-school requirements and work toward gainful employment. WIOA Title I supports occupational training and WIOA Title II (the Adult Education and Family Literacy Act) supports GED preparation, basic skills education, and ESL. In recognition of the evidence of effectiveness of integrated learning models, the recently reauthorized WIOA includes an even greater emphasis on blending these services.

Enrolling in a basic WIOA Title II ABE/ESL program would allow otherwise DACA-eligible youth without a diploma or GED to meet their in-school requirement and become work authorized. Unlike other WIOA titles, Title II is available to individuals without work authorization. But research suggests that positive employment outcomes are more likely if these individuals enroll in integrated programs that provide basic education or ESL (WIOA Title II) in the context of occupational training (WIOA Title I).

However, to access integrated programs that are partially funded by WIOA Title I, individuals must *first* be work authorized. The intersection of DACA's in-school requirement and WIOA Title I's work-authorization requirement creates a Catch-22 that makes it challenging for over 400,000 youth and young adults to benefit from DACA and contribute more fully to the economy.

Inadequate Capacity: Limited Pathways for Work Authorized Individuals under DACA and DAPA

For the 1.5 million youth and young adults who meet all of the expanded DACA's requirements, and for the 3.7 million potentially eligible DAPA individuals, work authorization creates an opportunity to advance on job-driven pathways through WIOA Title I-funded occupational training programs, including those integrated with WIOA Title II-funded ABE/ESL. At the time of DACA's initial launch in 2012, forty-one percent (510,000) of the immediately eligible population had a high school diploma or GED but were not enrolled in a postsecondary education or training program. And 28 percent of the immediately eligible were Limited English Proficient.¹³ However, after DACA was announced in 2012, there was some confusion at the local level as to whether DACA youth are eligible for services under WIOA and its predecessor, the Workforce Investment Act (WIA).

In an effort to eliminate this confusion, in July 2014, the United States Department of Labor issued guidance clarifying that under WIA's non-discrimination provisions, work-authorized DACA participants are eligible for all WIA and Wagner-Peyser programs. This was an important step in ensuring that DACA could realize its full economic impact as it created greater access to job-driven educational pathways for DACA youth and young adults.

With the recent reauthorization of WIA (now WIOA), the expansion of DACA, and the implementation of DAPA, it will be important for the administration to clarify once again that work-authorized individuals are eligible for WIOA-funded services.

Even with new guidance, however, the ongoing underfunding of WIOA creates a barrier to realizing DACA and DAPA's full economic potential. Adjusted for inflation, funding for WIOA Title II services has declined by nearly 24 percent since 2003, and the number of individuals served nationwide has declined by one million (30 percent) since 2000. Currently, the program reaches only 1.7 million adults and out-of-school youth each year, which is alarming in the context of the overall need for ABE/ESL services: In the U.S., 36 million individuals between the ages of 16 and 65 have low literacy skills, 62 million have low numeracy skills, and 12.4 million do not speak English well or at all.¹⁴

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Funding for WIOA Title I services has likewise declined. Federal and state policymakers as well as the private sector must make significant new investment in these programs.

LEARNING FROM DREAM, DACA AND DAPA: ARE WE READY FOR COMPREHENSIVE REFORM?

While the nation waits for comprehensive immigration reform, it is important to reflect on what we can learn from the DREAM Act as well as DACA and DAPA to inform future legislation. The DREAM Act will likely be included in any comprehensive package. The immigration and workforce development fields can't wait until legislation is on the floor to make the case to policymakers that the DREAM Act needs to recognize middle-skill occupational certificates as valid and economically essential. The time to make that case is now.

Likewise, the capacity and infrastructure issues that already make it challenging for DACA and DAPA participants to pursue job-driven educational pathways could become barriers to citizenship for these and other unauthorized immigrants if comprehensive legislation eventually passes. As described above, the Border Security, Economic Opportunity, and Immigration Modernization Act (S.744) passed by the Senate in 2013 will likely serve as a model for any eventual comprehensive legislation.

The bill establishes a minimum 13-year pathway to earned citizenship for formerly unauthorized immigrants, a population which would include many (but not all) of the 11.4 million unauthorized individuals in the U.S. today. The pathway requires immigrants to meet a series of benchmarks related to employment, earnings, education, and English proficiency as they progress through temporary to permanent immigrant status and then eventual citizenship.¹⁵ Key benchmarks include:

Year 6: To Renew Registered Provisional Immigrant (RPI) Status

- Continuous employment (unemployed no more than 60 consecutive days at a time)
- *Or* can prove income or resources at or above 100 percent of the federal poverty level
- *Or* enrolled in “full-time” education and training

Year 10: To Adjust to Lawful Permanent Resident (LPR) Status

- Continuous employment (unemployed no more than 60 consecutive days at a time)
- *Or* can prove income or resources at or above 125 percent of the federal poverty level
- *Or* enrolled in “full-time” education and training
- *And* demonstrate the level of English proficiency and knowledge of U.S. history/civics that is required for citizenship or be pursuing a course of study that is designed to lead to such proficiency/knowledge.¹⁶

Significantly, S. 744 establishes a broad definition of education and training that acknowledges the range of programs that are essential to building a skilled workforce. These include institutions of higher education and secondary education as well as nonprofit and community-based education, literacy, or career training programs (including vocational training) that are designed to lead to placement in postsecondary education, job training, or employment, as well as programs assisting students in obtaining a high school diploma, its recognized equivalent, or in passing a GED/equivalent.

Data on the current employment, income, and English proficiency of the 11.4 million undocumented individuals who could be affected by immigration reform (as well as other immigrants currently awaiting green cards or other adjustments of status) suggests that significant resources will be necessary to help people not only meet the mandates under the legislation, but also to meet the skill needs of employers and to start on a career pathway to family sustaining employment.

About 90 percent of the 7.6 million undocumented individuals over the age of 16 in the U.S. labor force are employed. However, many

unauthorized immigrants in the workforce – just like many U.S. citizens in the workforce – lack the skills they need to obtain high-demand jobs that pay a family-supporting wage. Fifty percent of unauthorized adults do not have a high school diploma or GED, and over half of the unauthorized population has limited English proficiency. There are 3.5 million unauthorized individuals (31 percent) living below the poverty line.¹⁷ Substantial resources and infrastructure will be necessary to address the adult education, English language, occupational training, and employment needs of immigrant workers and citizens alike, as well as the needs of employers who need skilled workers.

Unfortunately, within immigration policy debates, the process of *immigrant integration* often gets less attention compared to issues such as enforcement and border security. Commonly defined as having three pillars – linguistic, civic, and economic – immigrant integration is the process by which newcomers become incorporated into American society. Yet although high-quality integration is a powerful engine driving economic inclusion and family success, its importance is often overlooked.

Even within the smaller world of immigrant integration policy debates, workforce skills are sometimes seen as something that can be addressed once more immediate concerns like application fees and paperwork are resolved. But in truth, an intentional, pro-active skills strategy within immigrant integration policy will amplify the effects of other integration activities, and increase the likelihood of overall individual and community success.

Policymakers and advocates within the immigration, adult education, and workforce development fields simply can't wait until the day when comprehensive reform passes to address these issues. The field must start now to build momentum and political will for a comprehensive skills strategy. That strategy will require local and state policy efforts and investments. But it will also require some creative thinking within the context of federal policy and that thinking has to happen now. If we wait to tackle these issues after comprehensive reform happens, millions of individuals will be cut off from the pathway to citizenship and to fully contributing to the economy.

DREAM, DACA, AND DAPA AS SCAFFOLDING FOR COMPREHENSIVE REFORM: RECOMMENDATIONS TOWARD A SKILLS STRATEGY NOW

Immigration policy has the potential to bring about tremendous economic benefit for individuals and the economy as a whole. But to realize this potential, both existing and new policies must support job-driven educational pathways, and policymakers must invest in the capacity needed to support those pathways. Below, we outline specific recommendations for improving current policy proposals and programs.

DREAM Act

Make educational pathways job-driven: Expand the educational requirements in the DREAM Act to include industry recognized middle-skill credentials obtained through occupational training so that the policy can achieve its full potential economic impact for individuals and the nation as a whole. Allowable programs of study should include those that help individuals obtain a high school diploma or raise basic literacy or English language skills in the context of occupational training, as well as stand-alone middle-skill occupational training programs that lead to an industry recognized credential.

DACA and DAPA

Break the WIOA Title I/Work Authorization Catch-22: Under DACA, enrolling in WIOA-funded programs would allow the 423,000 individuals without a diploma or GED to obtain work authorization. However, to enroll in integrated programs that build basic skills in the context of training for an occupation (specifically programs that draw on WIOA Title I funds), they must first be work authorized. The administration should explore options to break through this barrier through administrative action.

Re-issue guidance affirming access to WIOA for work-authorized individuals: In July 2014, the U.S. Department of Labor issued guidance clarifying that under WIA's non-discrimination provisions, work-authorized DACA participants are eligible for WIA and Wagner-Peyser programs. With the reauthorization of WIA (now WIOA), the expansion of DACA, and the announcement of DAPA, it is important for the administration to clarify once again,

that work-authorized DACA and DAPA participants are eligible for services under WIOA.

Interagency Taskforce on Immigrant Integration

When the President announced his executive actions on DACA and DAPA in November 2014, he also called for the creation of the Interagency Taskforce on Immigrant Integration, which is required to issue an integration plan within 120 days. The United States Departments of Labor and Education are mandated partners on this taskforce and should play an active and vocal role to ensure that issues related to positive employment outcomes and advancement opportunities for those with work authorization receive equal attention to other integration issues.

WIOA Implementation

The newly reauthorized WIOA creates some important opportunities for immigrant workers. At a programmatic level, it explicitly calls for ABE/ESL programs under Title II to work toward employment outcomes, and encourages (and tries to eliminate the barriers to) blending of ABE/ESL (Title II) and occupational training (Title I) funding – a program model that is proven to increase the likelihood of positive employment outcomes. In addition, in codifying the integrated English Literacy and Civics education (IEL/CE) program, it explicitly calls for a connection to employment outcomes. Programs are supposed to prepare English language learners for, and place them in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

At a systems level, WIOA promotes alignment between Title I (training) and Title II (ABE/ESL) by mandating unified plans that are jointly developed by the state entities administering the four titles under WIOA. This increases the likelihood of career pathways for individuals with low basic skills and/or limited English proficiency. It also explicitly calls for the newly codified/employment focused integrated English Literacy and Civics education (IEL/CE) program to integrate with the local workforce development system and its functions to carry out the program. This increases the likelihood that immigrants will have access to career pathways that support employment advancement.

Of course, there can be a great distance between legislative intent and implementation. Realizing the potential of WIOA for immigrant workers will require the following support from states:

Pursue authentic stakeholder engagement, including immigration and adult basic education/ESL stakeholders. States need to authentically engage stakeholders in the WIOA planning process. In particular, WIOA establishes common performance metrics that include employment outcomes as well as learning gains. Immigration advocates and providers of adult basic education and ESL need to weigh in on how those new standards are implemented so as to encourage positive employment outcomes without discentivizing service to those with the lowest literacy, numeracy, and English language skills.

Engage in authentic unified planning. States need to bring all the necessary entities to the table in developing their unified plan. State administrators of all WIOA titles should be a part of planning discussions at the very beginning and throughout the process.

Consider the potential of combined plans to better support upskilling immigrant workers. States have the choice of either submitting a unified plan that includes WIOA's four titles *or* a combined plan that also includes operational components required by federal agencies for other programs, such as Career and Technical Education (CTE), Community Development Block Grants (CDBG), Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), and Temporary Assistance for Needy Families (TANF). Having a combined plan will help coordinate the efforts of agencies and programs and align programs that are better able to serve individuals with low basic skills and limited English proficiency. This alignment can increase the likelihood of successful outcomes for this population in ABE/ESL and workforce training programs.

While individuals under DACA and DAPA are notably not eligible to receive assistance from federally funded programs like TANF and SNAP E&T, some states have separate state resources for these purposes that *are* available to DACA participants. For example, in New York, DACA participants are eligible for state-funded benefits, including cash assistance through the Safety Net program.¹⁸ A combined state planning process can help ensure that these state resources are aligned with federal resources to support successful

A combined state planning process can help ensure that these state funded resources that supplement federal resources are aligned to support successful outcomes for DACA and DAPA individuals enrolled in ABE/ESL or workforce training programs.

outcomes for DACA and DAPA individuals enrolled in ABE/ESL or workforce training programs. What's more, should comprehensive immigration reform come to pass, combined plans will help ensure that states are better positioned to engage in a skills strategy that allows those on a path to citizenship to fully contribute to the economy.

Funding and Capacity

Fund WIOA at authorized levels: Unlike its predecessor WIA, which simply specified that the program would be funded by Congress using "such sums as necessary," WIOA includes specific funding levels for each fiscal year from 2015 through 2020. Congress must take steps to ensure that programs will be fully funded at authorized levels.

Leverage Comprehensive Immigration Reform (CIR) to support a national skills strategy: Ultimately, to ensure our economic future, the nation needs a congressionally authorized comprehensive approach to immigration reform. To ensure this legislation realizes its potential to foster economic growth and opportunity, it must be accompanied by an equally ambitious investment in skills, far greater than what has previously been proposed. National Skills Coalition has put forth a proposal for three new grant programs that could be implemented within the most recent Senate-passed comprehensive immigration reform bill that would dramatically increase the resources available for skills training for those working toward citizenship, as well as current United States citizens, without increasing the cost of the bill.¹⁹

CONCLUSION

Immigration policy has the potential to make it easier for millions to fully contribute to growing the economy. Including educational requirements in immigration proposals can help increase the likelihood of positive outcomes for individuals and the economy but only if these requirements are in line with labor market demand and only if they are supported by adequate policy infrastructure and investments. In the short-term, WIOA implementation creates an opportunity to ensure that job-driven pathways are more available to those impacted by DACA and DAPA. Longer-term, policymakers need to consider ways to make the DREAM Act more responsive to labor market demand for middle-skill credentials

and develop a comprehensive skills strategy within eventual comprehensive immigration reform – a strategy that can help those on a pathway to citizenship as well as current citizens pursue the skills needed to help their families and America prosper. While comprehensive reform may be a longer-term proposition, we can't wait to develop a comprehensive skills strategy. If we wait to develop that strategy and if we don't immediately work to ensure WIOA implementation is informed by immigration and adult basic education communities, the positive economic impact of immigration policy will be missing in action.

APPENDIX: EMPLOYMENT AND EDUCATION-RELATED REQUIREMENTS IN CONGRESSIONAL PROPOSALS AND ADMINISTRATIVE ACTIONS

While DACA has minimal education requirements and DAPA has no education requirements, for these policies to realize their economic potential, there need to be opportunities for impacted individuals to build skills that are in demand in the labor market. What’s more, immigration, adult education, and workforce development stakeholders as well as policymakers need to be developing a skills strategy now that will make it possible for immigrants to meet the employment, earnings, education, and English requirements under eventual comprehensive reform so that it can realize its economic potential.

	EMPLOYMENT	EARNINGS	EDUCATION	ENGLISH
Congressional Action (Pathway to Citizenship)				
DREAM Act			AA/BA	
S. 744 (Senate-passed CIR bill)				
Year 6: To Renew Registered Provisional Immigrant (RPI) Status	Continuous employment (unemployed no more than 60 consecutive days at a time)	<i>Or</i> can prove income or resources at or above 100 percent of the federal poverty level	<i>Or</i> enrolled in “full-time” education and training	
Year 10: To Adjust to Lawful Permanent Resident (LPR) Status	Continuous employment (unemployed no more than 60 consecutive days at a time)	<i>Or</i> can prove income or resources at or above 125 percent of the federal poverty level	<i>Or</i> enrolled in “full-time” education and training	<i>And</i> demonstrate the level of English proficiency and knowledge of U.S. history/civics that is required for citizenship <i>or</i> be pursuing a course of study that is designed to lead to such proficiency/knowledge
Executive Action (No Pathway to Citizenship)				
DACA	None	None	Diploma/GED or in school	None
DAPA	None	None	None	None

NOTES

- ¹ Dowell Myers, Stephen Levy, and John Pitkin. *The Contributions of Immigrants and Their Children to the American Workforce and Jobs of the Future*. Center for American Progress. June 19, 2013. <https://www.americanprogress.org/issues/immigration/report/2013/06/19/66891/the-contributions-of-immigrants-and-their-children-to-the-american-workforce-and-jobs-of-the-future/>
- ² Jeanne Batalova, Sarah Hooker, Randy Capps and James D. Bachmeier. *DACA at the Two-Year Mark: A National and State Profile of Youth Eligible and Applying for Deferred Action*. Migration Policy Institute. August 2014. <http://www.migrationpolicy.org/research/daca-two-year-mark-national-and-state-profile-youth-eligible-and-applying-deferred-action>
- ³ Jeanne Batalova and Margie McHugh. *MPI Updates National and State-Level Estimates of Potential DREAM Act Beneficiaries*. Migration Policy Institute. December 2010.
- ⁴ For national and state data on middle-skill jobs and the middle-skill gap, see *Forgotten Middle-Skill Jobs: State by State Snapshots*. National Skills Coalition. August 2014. <http://www.nationalskillscoalition.org/state-policy/fact-sheets>
- ⁵ Anthony P. Carnevale, Stephen J. Rose and Andrew. R. Hanson. *Certificates: Gateway to Gainful Employment and College Degrees*. Georgetown University Center on Education and the Workforce. June 2012. <http://cew.georgetown.edu/certificates>
- ⁶ Anthony P. Carnevale, Stephen J. Rose and Andrew. R. Hanson. *Certificates: Gateway to Gainful Employment and College Degrees*. Georgetown University Center on Education and the Workforce. June 2012. <http://cew.georgetown.edu/certificates>
- ⁷ JPMorgan Chase, New Skills at Work Initiative. *Closing The Skills Gap: Preparing New Yorkers For High-Growth, High-Demand, Middle-Skill Jobs*. October 2014.

JPMorgan Chase, New Skills at Work Initiative. *Preparing Houston To Skill Up: Addressing The Skills Mismatch To Meet Employer Demand In High-Growth Industries*. November 2014.
- ⁸ Batalova et al. *DACA at the Two-Year Mark*.
- ⁹ *National and State Estimates of Populations Eligible for Anticipated Deferred Action and DACA Programs*. Migration Policy Institute. November 2014. <http://my.migrationpolicy.org/salsa/track.jsp?v=2&c=QnYf6BNkRTBzqG1DcKpVJpPAGjrTx3qc>
- ¹⁰ Batalova et al. *DACA at the Two-Year Mark*.
- ¹¹ Matthew Zeidenberg, Sung-Woo Cho, and Davis Jenkins. *Washington State's Integrated Basic Education and Skills Training Program (I-BEST): New Evidence of Effectiveness*. Community College Research Center. 2010.
- ¹² Sheila Maguire, Joshua Freely, Carol Clymer and Maureen Conway. *Job Training that Works: Findings from the Sectoral Employment Impact Study*. P/PV. 2009. http://www.issuelab.org/resource/job_training_that_works_findings_from_the_sectoral_employment_impact_study
- ¹³ Batalova et al. *DACA at the Two-Year Mark*.
- ¹⁴ OECD's 2013 Program for the International Assessment of Adult Competencies.
- ¹⁵ The Senate bill allows for waivers to these requirements for individuals who can show extreme hardship
- ¹⁶ The Senate bill includes a mandatory exception to the English/civics requirement for individuals with disabilities and discretionary exception for those who are age 70 and older.
- ¹⁷ Profile of the Unauthorized Population: United States. Migration Policy Institute. 2014. <http://www.migrationpolicy.org/data/unauthorized-immigrant-population/state/US>
- ¹⁸ Empire Justice Center. *Public Benefit Eligibility of Deferred Action Dreamers*. September 2012. <http://www.empirejustice.org/issue-areas/immigrant-rights/access-to-public-benefits/public-benefit-eligibility-of.html>
- ¹⁹ *Comprehensive Immigration Reform: A Proposal for a Skills Strategy that Supports Economic Growth and Opportunity*. National Skills Coalition. June 2013. http://www.nationalskillscoalition.org/resources/publications/file/2013-6-24_NSC-CIR-Recommendations-Final.pdf

ABOUT NATIONAL SKILLS COALITION

National Skills Coalition is a non-partisan, broad-based coalition of employers, unions, education and training providers, and public officials working toward a vision of an America that grows its economy by investing in its people so that every worker and every industry has the skills to compete and prosper. We engage in organizing, advocacy, and communications to advance state and federal policies that support these goals — policies that are based on the on-the-ground expertise of our members.

National Skills Coalition was founded in 1998 as The Workforce Alliance in response to a series of federal policies that signaled the end of national investments in the skills of America's workers at a time when skill gaps were growing in key U.S. industries. Since then, we've demonstrated that investments in skills work. We've shown that diverse stakeholders can find agreement around specific reforms that will improve a variety of workforce education and training policies. And we have documented that the American public is strongly supportive of a deeper investment in the skills of America's workers. We continue to mobilize support for a new national skills agenda that cuts across public policies, and simultaneously serves a wide range of U.S. workers and industries.

National Skills Coalition is governed by a Board of Directors and advised by a national Leadership Council drawn from the ranks of business, labor, community colleges, community-based organizations, and the public workforce system.

More than 8,000 members, representing more than 3,000 organizations in all 50 states, comprise the broad-based membership of National Skills Coalition.

Learn more at www.nationalskillscoalition.org.



NATIONAL SKILLS COALITION
Every worker. Every industry. **A strong economy.**

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