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To Whom It May Concern:

The Center for Law and Social Policy (CLASP) is pleased to submit these recommendations to inform the goals of the White House Task Force on New Americans. CLASP is a national, non-partisan, non-profit, anti-poverty organization that advances policy solutions for people with low incomes and communities of color. Our recommendations draw upon our cross-sector expertise in immigration and anti-poverty policies.

We are pleased that the Biden Administration is re-launching this critical interagency task force to ensure that immigrants—including those newly arrived and those who have long-established roots in the United States—are supported in becoming thriving members of their communities. As the task force takes on its work, we want to stress the importance of advancing comprehensive and inclusive solutions that reflect the diversity of the immigrant community. Such an approach requires addressing the needs of immigrants with low incomes, as well as adopting a whole-family, multi-generational strategy that recognizes the reality of mixed-status families. With more than 1 in 4 U.S. children living in an immigrant family and more than 5 million children living with at least one undocumented parent, any effort to connect immigrant families to government programs must be welcoming and inclusive of immigrants of all statuses.

Overarching recommendations

There are several gaps in ensuring New Americans can successfully integrate and resettle into the U.S. community. Below are recommended [programs and practices](#) that can assist with improved immigrant integration and would benefit from increased funding.

- Ensure English classes are offered at schools, libraries, and other publicly accessible locations (e.g., community centers), and also support English language learners' school success.
- Guarantee that culturally competent and multilingual social workers, counselors, staff, public benefit providers, and services providers are present in schools, health care centers, and the police force.
- Support *Know your Rights* trainings and workshops for the immigrant community to spread awareness about protected areas and public charge rules.
- Share coordinated and consistent messaging about available resources and services.
- Provide ongoing training for public benefit program administrators on the limited benefits that are counted in a public charge determination, with emphasis that all others are not.

- Ensure immigrant children have access to education, from child care and early education services through K-12, higher education, and beyond.
- Provide the ability for immigrants to obtain a free or affordable ID card for help with accessing services like opening a bank account or enrolling a child in school.
- Support connections between employers looking for workers and immigrants looking for work.
- Assist immigrants in accessing ongoing, high-quality, and affordable mental health supports.
- Remove barriers to public benefits, like the 5-year bar to food stamps and health care.
- Offer free or affordable legal assistance for immigration cases.
- Increase opportunities for intentional dialogue between immigrants and nonimmigrant communities.
- Include immigrant communities into the data collection and interpretation of any federally funded research proposals involving immigrant communities.
- Safeguard data to ensure that data is not shared or used for purposes other than what it was provided for and ensure that sensitive or identifying information provided by immigrants is stored only for a pre-specified period and then disposed of securely.

Language Learning & Access

Under Title VI of the Civil Rights Act of 1964 (Title VI) and the Equal Educational Opportunities Act of 1974 (EEOA), public schools must ensure that English Learner (EL) students can participate meaningfully and equally in educational programs, regardless of language. This includes providing language-accessible information for students' multilingual parents. However, there are many concerns that students and their families are not receiving these benefits.

The Department of Justice and Department of Education issued [joint guidance](#) to local education agencies on their obligations related to ELs, as well as [a new fact sheet](#) for parents and educators related to these rights. The federal government should recirculate the joint guidance referenced to ensure that local education agencies are supporting ELs and their families. This includes making sure that parent resources are translated into multiple languages and shared through a variety of mediums to ensure that students and parents can better advocate for their own rights and so that educators are aware of their obligations.

There are several federal programs that have shown success at helping families overcome barriers to integration and inclusion as it relates to language access.

- New America has put together a [list of instructional models](#) for ELs and highlighted promising success of these models in various states.
 - [In California](#), nearly [60 percent](#) of children ages zero to five live in a home where a language other than English is spoken. The [Sobrato Early Academic Language \(SEAL\)](#) model has been working to address these gaps by providing a research-based approach to meeting English learners' (ELs) linguistic and academic needs by capitalizing on their assets.

- [In Florida](#), Miami's School Readiness Project (a large-scale project that collected longitudinal data on five cohorts of low-income Miami-Dade preschoolers) analyzed outcomes for ELs in two-way immersion programs, which are designed to prepare bilingual, biliterate, and bicultural students. Researchers found that ELs who attended schools with two-way immersion programs had faster English language acquisition than students enrolled in other types of teaching models, such as those that maintain English-only instruction, as well as higher achievement on academic measures, including math and reading scores on statewide assessments and grade point average (GPA).
- Similarly, as the country's demographics begin to shift, more of our younger children are growing up learning two or more languages. Efforts to ensure meaningful accommodations for [Dual Language Learners \(DLLs\)](#) in early education programs such as [Head Start \(HS\) and Early Head Start](#) are also important given that DLLs belong to the country's fastest-growing population, represented in almost [87 percent of 3- and 4-year-old children in Head Start classrooms](#). As evident by successful HS programs, improvement in both English and Spanish oral proficiency for DLLs occurs when both languages are used for instruction in preschool classrooms. Moreover, [Migrant and Seasonal Head Start programs](#) offer additional support to the whole family. These supports are designed to meet the unique needs of these families, including learning about the educational system in the US and connecting families with mental health services, all in their primary language.

Moreover, many other critical programs that serve people with low incomes are federally funded, but state or locally administered. States and localities vary greatly in the resources that they devote to language access and in the number of languages in which they translate materials. Federal agencies should provide more translated materials that can be adapted by state and local agencies (e.g., to add specific program names, websites, phone numbers, etc.). Federal agencies should enforce legal requirements to provide qualified translation and interpretation services, and in particular, should remind agencies that depending on family members for interpretation does not fulfill the requirements.

Health and Wellbeing

Health Care and Mental Health

Immigrants need support in navigating the healthcare system and finding appropriate and culturally responsive care. Immigrant communities also encounter many challenges such as discrimination, isolation, stigma, and a sense of separation. These challenges often compound the trauma that they faced before and after migrating. New Americans face many barriers to improve their mental health because of language barriers, limited access to healthcare due to low-wage jobs and jobs without benefits, distrust of the government, and stigma that affects many communities. Providing resources and information about available services, as well as information about insurance coverage and no and low-cost support are vital to ensuring that

they access the services they need. Additionally, it's essential that the White House speaks with community leaders to help create appropriate language resources.

Some of the most significant health and well-being service gaps are often language barriers, stigma, and lack of diversity amongst service providers. While noting people's identities and their intersections, including race, ethnicity, immigration status, language concordance, lived experience, disability, sexual orientation, gender identity, and age, services providers must be allowed the flexibility to provide responsive services, and be reimbursed for those services. Additionally, funding must be allocated to bolster the behavioral health workforce, including but not exclusive to psychiatrists, psychologists, general practitioners, peer support providers, community health workers, social workers, cultural healers, or community leaders. This includes reimbursement mechanisms and building pipelines within communities.

- We support listening sessions with diverse immigrant communities across the country to learn more about specific physical and emotional health and well-being needs. The government could learn from providers that have been filling the gaps to provide needed services to immigrant populations. For example, to bridge the gap to address mental health needs of recent immigrants, [Austin Child Guidance Center](#) has expanded their services to provide trauma-informed and healing-centered care. Lawmakers could learn from them and other similar groups about best practices and challenges and share them across the country.
 - *Listening session questions could include:* What are the barriers to mental health access, and what are some best practices that can address those barriers? How can behavioral health payment structures be reevaluated and reconstructed to benefit immigrant populations?

Access Critical Benefits

Immigrant status is a [social determinant of health](#) as it determines immigrants' health trajectories in several ways. One is immigrants' access to public benefits, the use of which are tied to [improved health outcomes](#). There are several barriers facing immigrants and their families in accessing benefits they are eligible for, including language and cultural barriers, confusing immigrant eligibility rules, as well as immigration-related concerns such as whether using a certain benefit may have make them a "public charge," if their information will be shared with immigration enforcement officials, or even encountering immigration agents at a location where they access healthcare, education or other services. For even lawfully present immigrants, eligibility rules are restrictive (such as the federal law requiring most lawfully present immigrants to wait five years to access federal means-tested programs like SSI, TANF, SNAP, and Medicaid), and there is also often confusion due to differences in eligibility based on age, immigration status, and state-based factors. [Research](#) has also found that children of immigrants, the majority of whom are U.S. citizens and therefore eligible for benefits, have lower rates of participation in health care and nutrition programs that are critical for their healthy development, as well as early education programs such as child care. Once again, any effort to ensure immigrants and their families are accessing the benefits and supports for which

they are eligible should include outreach to the broad immigrant community, including undocumented and other ineligible immigrants who may be parents and family members responsible for enrolling others.

Despite the Trump-era public charge rule being retracted and the new Biden rule going into effect late last year, immigrant communities continue to be reluctant to use critical benefits for themselves or their family members due to concerns of being considered a public charge. As shared in previous recommendations from CLASP and other partners, we encourage the Administration to engage in an inter-agency outreach and engagement campaign on the public charge rule that includes the following components:

- DHS, in partnership with benefits granting agencies, should launch an interagency campaign to clearly communicate the new public charge rule in multiple languages. For children, it is important that agencies like the Departments of Education, Health and Human Services, Agriculture, and Housing and Urban Development partner to ensure that the campaign reaches families with children in trusted spaces where they receive services like schools, federally qualified health centers and look-alikes, child care centers, and early education centers.
 - Agencies administering benefits should support states and service providers in creating materials and supportive services, such as hotlines, specifically for families in multiple languages. States and community groups who work directly with families must be given accessible, multilingual outreach materials suited to their populations and their ways of interacting with their clients.
 - Funding should be provided to trusted community organizations that can provide outreach and education to immigrants and their families. Research also shows that [community organizations are trusted sources of information for immigrant families](#).
- Outreach efforts should reach all families, including families with non-citizen children. Non-citizen children are eligible for some federal and state public benefits programs and their family members must also understand that a child's use of those benefits will not have immigration consequences for the family member.

Fears of immigration enforcement agents being present at critical locations continue to create barriers for immigrants in freely accessing places of learning, health care facilities, places of worship, places that provide disaster and emergency relief, and other supports. The recent 2021 protected areas policy greatly restricts immigration enforcement actions in places critical for families, yet in order for the policy to be effective, it's essential that providers and community partners on the ground know about the policy, how to enforce it, and how to report violations.

- Our work in providing [technical assistance and outreach](#) about the previous sensitive locations policy has found that often locations that fall under the policy are completely unaware of it or unclear on what it means for them—such as whether immigration agents are permitted to sit outside their center or their parking lots. There is even less awareness about how to report possible violations. Thus, we believe it is critical for DHS

to partner with other relevant agencies (such as the Departments of Education, Health and Human Services, etc.) to develop joint fact sheets and guidance for their local agencies so that they are aware of the policy.

Access to Education

Education, from early childhood through the postsecondary level and beyond, is critical for the successful integration of children and young people into their new communities, as well as to their ability to achieve their full potential and contribute to the country's workforce. All U.S. children, regardless of their or their parents' immigration status, are entitled to a public K-12 education, which has long been recognized as a critical right in ensuring equitable opportunity for children growing up in the United States. Integration efforts must ensure that schools, colleges, and other places of learning are provided guidance that clarify their obligations to ensure their enrollment practices are not deterring immigrant students or immigrant families from accessing educational programs as well as best practices on how to make their programs welcoming and inclusive.

- **Child Care and Pre-k:** Children need a safe place to grow and learn while their parents are working. Child care, pre-K and other early childhood programs are vital to supporting families as they integrate and become established members of their communities. New Americans are eligible for these programs and deserve to get assistance to access these programs.
 - The federal government should support states in providing streamlined eligibility for these programs, as well as provide funding and resources to support families accessing these services. Additionally, the federal government should create guidance that emphasizes the importance of utilizing trusted community partners, trusted leaders, or organizations who speak the languages of the community to share and provide information to potentially eligible families, as well as encourage states to only ask for information that is needed to make an eligibility determination for the child or children who need care by eliminating duplication and only collecting documentation that is essential for determining eligibility.
- **K-12:** To ensure that all children in the United States have access to a public primary and secondary education, we recommend that the Department of Education and Department of Justice recirculate the [2014 Dear Colleague](#) letter among Local Education Agencies (LEAs) which highlights the legal obligations of LEAs under the 1982 *Plyler v. Doe* ruling and other civil rights laws. We also recommend that the agency update the supporting materials that accompany the letter, such as the [FAQs](#), and make it easier for local education agencies to find additional guidance related to specific populations of immigrants, such as unaccompanied children, children of migrant farmworkers, ELs, and immigrant children with disabilities.
 - We also recommend that the Department of Education create a resource for LEAs specific to immigrant children with disabilities. For a state to be eligible for

federal assistance under IDEA Part B, it must provide assurance that “a free appropriate public education is available to all children with disabilities *residing*” in the state. All publicly funded schools in the U.S must also meet IDEA “Child Find” requirements, which means that schools and districts must actively look for ways to identify and refer children with disabilities for evaluation and support, including undocumented children.

- LEAs should also ensure that any developmental and disability screening is done in children’s primary language. When programs do not screen in the home language, they get an incomplete picture of students’ linguistic abilities, setting in a motion a “[deficit perspective](#)” that focuses on what children cannot do versus what they can. Screening bilingually/multilingually can also help educators differentiate between typical development and language delays to other learning disabilities.

Data & Research

Decades of harmful immigration policies have eroded trust between immigrant communities and the government. As a result, data collection by the government on immigrants may be flawed. A 2018 [analysis](#) found high nonresponse rates on the citizenship question on the Census Bureau’s American Community Survey. Sensitive data collection and storage must be entrusted to a non-governmental entity for accuracy and trust-building, and data sharing agreements with the government should be limited to only what is necessary. In other words, any data requests from the government to researchers with immigrant data should be as narrow as possible and have the discrete purpose to benefit the immigrant community, not to surveil or harm them. Data security measures should be implemented to ensure that data is not shared or used for purposes other than what it was provided for. Data retention policies should also be adopted by all federal agencies to ensure that sensitive or identifying information provided by immigrants is stored only for a pre-specified period and then disposed of securely. Trust is the foundation of humane, inclusive, and reliable research among any community.

Furthermore, while existing measures of immigration integration should be included when evaluating immigrant integration (e.g., employment, income, measures of social cohesion), other immigrant-related local and state policies should also be included in any evaluation (e.g., sanctuary cities and access to driver’s licenses). There may be a need to fund research on and update existing measures of social cohesion or immigrant integration to obtain a nuanced picture of immigrant integration in the country. Immigrant integration could include both quantitative and qualitative indicators such as the number of immigrants in positions of influence (e.g., school board), immigrant representation in movies, TV, and the media (see the [ground-breaking research of Define American](#)), crime reporting among immigrant communities (this is a measure of trust between immigrant communities and law enforcement), and school attendance levels of children of immigrants. Immigrants and New Americans should play a central role in the data collection and interpretation processes of any research conducted on immigrant populations. Survey data alone is insufficient to fully understand why the needs of immigrant communities are not being met. The federal government should make sure

immigrants are included into the data collection and interpretation of any federally funded research proposals involving immigrant communities.

Gaps in research include:

- Longitudinal research on long-standing immigrant communities in the U.S.
- Data that allows for the comparison between integration outcomes based on admissions groups (e.g., refugees versus Temporary Protected Status).
- De-identified household income data by admissions groups, which is an especially critical factor for researchers and advocates to understand immigrant communities' eligibility and access to safety net programs.

Conclusion

Support for New Americans is fundamental to their ability to resettle, integrate, and thrive in their new communities. We are hopeful that this critical interagency task force ensures those newly arrived and those who have long-established roots in the U.S. are supported in becoming thriving members of our country. As evident from many of our recommendations above and recommendations made by our partners, the issues that are facing New Americans are intersectional and must be considered as such. We look forward to continuing to support the Administration and the Task Force in this important work.