

ATTACHMENT **SAMPLE BUSINESS PLAN**

Interfaith Ministries for Greater Houston Refugee and Immigration Services

Background

Interfaith Ministries has established itself as a leader in the provision of refugee services through responsible contract management, provision of top-quality services, and innovation. These same attributes allow it to develop a new, but related, area of service--immigration legal services.

With refugee arrivals decreasing, and other kinds of immigration increasing, there is a nationwide push for refugee service providers to diversify services and offer services to immigrants. This ensures long-term stability for the organization, allows the organization to serve a far greater number of clients, and responds to the great need in the community.

In 2000-2001, Interfaith Ministries first established an immigration program. At that time, the organization became "recognized" by the Bureau of Immigration Appeals (BIA), a permanent designation that the agency retains. At that time, however, the immigration program did not survive, due to a lack of funding, an expensive plan, and the departure of the Director and lead staff member.

Now, Interfaith Ministries is in a position to resume the immigration program. Refugee Services funding is stable and has a surplus that can be utilized as seed money for the immigration program, while greater funding is pursued. Also, a three-step phase-in plan will help make the program scale-able, and avoid any deficit spending. Further, an improved work environment has resulted in less staff attrition, assuring greater staffing of the program.

Market Analysis

Description, Scope and Trends

The Immigration Program will provide services to persons who are filing applications with the US Citizenship and Immigration Services (USCIS, formerly INS). This typically includes foreign-born immigrants or refugees wishing to become Permanent Residents or U.S.citizens. This also includes immigrants, refugees, or citizens who wish to file an application to bring family members to the United States.

The United States is encountering the largest wave of immigration in almost 100 years. In 2005, there were 35.2 million foreign-born people living in the United States--the highest number ever recorded, and two and a half times the 13.5 million recorded during the peak of the last great immigration wave in 1910. Between January 2000 and March 2005, 7.9 million new immigrants settled in the country, making it the highest five-year period of immigration in American history.

Major Client Profile & Market Research

In Harris County, there are 895,936 residents who were foreign-born, or, basically, immigrants. This represents 24.6% of the population. 285,358 of these individuals have become US citizens, while the other 610,578 have not (this would include refugees, permanent residents, students, and undocumented/illegal immigrants). (All above data, US Census)

There are three categories of clients that this program will seek to serve, following the three stages of the program development.

1. *Refugees*. In the last five years, more than 8,000 refugees have arrived to the Houston area. Many of them are immediately eligible to apply for their family members still outside the US. In addition, every refugee needs to apply for permanent residency after one year. Interfaith Ministries has an excellent reputation and existing outreach into this community.

2. *Family Petitioners*. There are hundreds of thousands of residents of Harris County who are eligible to file for their family members to come to the US. This includes those with permanent residency, those who have attained citizenship, and those who were born in the US as citizens.

3. *Future-Eligible Immigrants*. There are approximately 11 million undocumented/illegal immigrants in the United States. (US Department of Homeland Security). It can be surmised that there are approximately 300,000 in Harris County. Congress is expected to take up immigration reform in 2007, and there is considerable possibility that at least some of these immigrants will be allowed to become legal residents. If so, it would probably take a year to formulate the plan and regulations, and the plan would likely allow many years for immigrants to apply for their new status. This would create a staggering need for immigration legal services for many years to come.

BIA-recognized community organizations are permitted to conduct immigration legal work only if they provide low-cost services, and serve low-income families. Therefore, this program would serve these families. The poverty rate for immigrants in general is 18.4 percent, and even higher among refugees and undocumented immigrants (Center for Immigration Studies).

Problems, Obstacles, Opportunities

The greatest challenges will be funding, to secure grant or private funding to grow the program for years to come. At the same time, clients will pay small fees for services, which will provide the benefit of income, as well as the challenge of managing a fee-for-service program.

At the same time, there is a great opportunity at this time to develop the program slowly. The current staffing experience, and network of support are there to support the program. If (and many would say "when") Congress passes legislation that causes millions of people to seek immigration services, Interfaith Ministries will be ready to serve those needs.

Competition

Currently, there are many for-profit immigration attorneys in Houston, most of whom are quite expensive. Many low-income immigrants seek services from unqualified and unscrupulous "notarios" who, in violation of the law, do immigration legal work for immigrants. Both USCIS and the Texas State Bar Association are doing major campaigns against such notarios and educating the public to seek the services of an attorney or a qualified community agency.

There are ten agencies in Houston that have ever been approved by the Board of Immigration Appeals to provide immigration legal services. Only five of these are currently active: Catholic Charities, YMCA International Services, The Alliance, Central American Refugee Center (CARECEN), and Immigration Counseling Services. Catholic Charities has the largest program, followed by YMCA, CARECEN, Immigration Counseling Services, and The Alliance.

Discussions with the program directors of Catholic Charities and YMCA indicate that they are overloaded. Without conducting any outreach or advertising, they still have a two month waiting for a first appointment. They both encouraged Interfaith Ministries to resume its immigration program, and expressed that there would be no lack of clients for any agency.

The agencies, through the refugee services work, have established a sense of collaboration and, as necessary, friendly competitiveness. From the perspective of the customer/client, Catholic Charities is

viewed as the best for complex cases, but more expensive than the others. YMCA is viewed as the most accessible and affordable, and The Alliance is viewed as an expensive option. Interfaith Ministries has a reputation in the refugee community of provide quality, thorough, and compassionate services, a reputation which will draw clients.

Market Strategy

For the first 6-12 months of the Immigration Program, the agency will market its services to refugees and Cubans who need to apply for their family members or apply for their permanent residency ("Green Card"). This will be done by word-of-mouth, quarterly outreach meetings, and a systematic mailing system. The roughly 300 clients who arrive each year will be informed of the immigration services, and advised to return to the agency to apply for their Green Card after 10 months in the US.

After one year, when the agency staff has gained more experience and training, and when more funding has been secured, the agency will commence providing services to immigrants who wish to apply for family members. For this, the agency will advertise to the general immigrant community. This will be done through Spanish-language media, contact with ethnic churches, and other traditional outreach methods.

Clients will also be referred by other agencies. Both Catholic Charities and YMCA have already said that they would refer their waiting-list clients to Interfaith Ministries.

If new legislation is passed, it has already been discussed that all the agencies in Houston will work together to inform and advise the public about where they may attain low-cost legal services.

Services

Using a three-stage growth model, the agency will provided services appropriate to its experience level, expertise and funding

The following services will be provided:

Stage One

Refugee Immigrant Visa Petition (I-730) Fee: \$50/petition

This is filed by refugees who would like their spouse, child or parents to join them in the United States.

Potential Annual Eligible Clients: 30

Adjustment of Status for Refugees/Cubans Fee: \$100/person

After one year in the US, refugees and Cubans may and should file to become permanent residents, and get their Green Card.

Potential Annual Eligible Clients: 200

Employment Authorization (I-765) Fee: \$25/person

After one year in the US, Cubans must apply to renew their work authorization

Potential Annual Eligible Clients: 100

Naturalization Fee: \$175/person

After five years in the US, refugees and Cubans are eligible to apply for citizenship.

Potential Annual Eligible Clients: 100

Support Services

Consultation/Office Visit \$25/half hour

Translations of Documents	\$25
Obtaining Info Pass Appointment	\$5/each

All fees paid up front. No payment plan. Additional fees for non-typical work required, and to respond to requests for evidence. Does not include USCIS fees, which client pays directly to USCIS.

Stage Two

Family Visa Petition (I-130) Fee: \$300
 Citizens and permanent residents may apply for various family members to come to the US.
 Potential Annual Eligible Clients: 100

Stage Three

[Potential] Adjustment of Status for Previously Undocumented Fee: TBD
 Persons who were previously in the country illegally can apply to become legal. Fees to be determined by the work required for each application, and caseload to be determined by how the law is written and who is eligible.
 Potential Annual Eligible Clients: TBD

Operations

Personnel. The following agency staff will be involved in the program.

Aaron Tate, Director, will oversee the development of the program, and is personally and professionally connected with many immigration professionals (both private and non-profit) in Houston.

Gordana Dvorscak, will serve as Immigration Counselor to provide client services. She has assisted the immigration program while working at YMCA. She is a strong leader, has great attention to detail, is goal-oriented. She currently handles a program serving 150 clients/year, supervises three staff members, and oversees two smaller programs handled by these staff members. She is a strong advocate for immigrants, and is a member of the Mayor's Office for Immigrant and Refugee Affairs task force. She will be applying to become an "Accredited Representative"--a person authorized by USCIS and BIA to represent clients before USCIS like an attorney. She will continue her current job responsibilities, and will only work on the immigration program as dictated by the caseload and the financial resources.

Victoria Cantu, Program Clerk, will likely provide client services as the program grows. Is currently involved with assisting clients with applications for family members (a non-immigration service). She is experienced in basic financial management, speaks Spanish, and is connected with the Hispanic immigrant community.

Additional Refugee Services staff will be utilized to spread the word about the program, and to provide translation and interpretation services. Currently, Refugee Services has 16 staff members, speaking 19 languages, including 6 Spanish speakers.

Volunteers may also be used to assist with services, under the review of an accredited representative.

Networking. Interfaith Ministries has relationships with the following people and agencies:

Catholic Charities. Jenny Cross (Program Director)
 YMCA International Services: Lisa Guitguit (Program Director)
 Mayor's Office of Immigrant and Refugee Affairs. Benito Juarez (Director)

Immigration Attorneys:
 Jennifer Guillfoyle, attorney, Church World Service, New York
 Wafa Adin, lead attorney, Catholic Charities

Magali Chandler, partner, Tindall & Foster
 Angelique Mortano, attorney, Tindall & Foster
 Joe Vail, former immigration judge, University of Houston Law Center

Support:

Church World Service. CWS national headquarters has a full-time immigration attorney on staff. Her job is to help affiliates start and run immigration programs. She provides program advice and training to immigration staff. She would be the primary legal advisor to IM's Immigration Counselor.

Houston Consortium. Catholic Charities and YMCA have met with agency staff and offered considerable time, advice, and information about how their program works. They are supportive and interested in helping Interfaith Ministries to start an immigration program.

USCIS. The local office of USCIS offers support to community organizations. Every quarter, they convene a meeting of accredited agencies, along with senior USCIS administration. They ask for specific problem cases, and general issues, and work with the agencies to resolve them. This gives agencies a level of access to USCIS that even private attorneys do not have. At the last meeting, the USCIS staff expressed support of the possibility of Interfaith Ministries resuming its immigration program.

Charles Foster. Partner at Tindall & Foster, the top immigration firm in Houston, Mr. Foster is also joining the board of Interfaith Ministries. In addition to having legal expertise, he may be able to offer funding and other advice.

Advisory Board. The agency will establish an advisory board to oversee the program. The board will be composed of both attorneys and community members.

Timeline

2006

1. Meet with local immigration experts for research
 - Aaron and Gordana met with Lisa from YMCA (June)
 - Aaron and Gordana met with Jenny from Catholic Charities (June)
2. Train staff on immigration
 - Aaron attended "Immigration Program Management & Legalization Capacity Building Conference" Dallas, TX presented by Catholic Legal Immigration Network (September)
 - Gordana attended "Survey of Immigration Law Conference" Chicago, IL presented by Catholic Legal Immigration Network (September)
 - Gordana received 3 two-hour web-based trainings (September & October)
 - Gordana attended 6-hour citizenship training (October)
 - Gordana spent eight hours observing immigration staff at YMCA (October)
3. Next Step: Establish infrastructure
 - Gordana applies to become an accredited representative, which will allow her to begin providing immigration services. Application takes 4-6 months for response.
 - Agency purchases immigration library resources using surplus CWS R&P 2006 funds (must be spent by end of CY 2006).

2007

January-May

- Continue staff training for Gordana and Aaron

- Create financial systems to collect client fees
- Begin grant-writing for additional funding

June-December

- When Gordana gets her accreditation, begin phase one, providing immigration legal services to refugees
- Adapt systems and structures to the needs
- Continue grant-writing and plan accordingly

2008

- Begin phase two, to offer immigration services to broader clientele
- Begin marketing to the Hispanic immigrant community

Service Delivery

When clients are referred to the program, they will call or walk in to the office, and will be directed to the Immigration Counselor. She will briefly discuss their need, their eligibility, and whether the agency can assist them. She will make an appointment for them for the initial consultation, and advise them to bring \$25 for the initial consultation fee. This fee is non-refundable, but will be applied toward the client's overall fee for service, should they continue for the service.

When the client arrives at the office, the client will first pay the initial consultation fee to the front desk, then proceed to meet with the Immigration Counselor. At the initial consultation, she will conduct the intake, complete intake forms, and create a file. She will then discuss the client's case in depth to determine if the client is in fact eligible, and if there are any problems with the clients applying to the USCIS. Then, she will advise the client on what must be done next. She will give client a list of items that the client must bring for the application to be completed, and advise client what is the fee for the service. Once all the clients' questions are answered, the initial consultation will end. The client will be advised to call for an appointment once all the items are in hand, and the client is ready to continue. This initial consultation will last no more than one hour.

When the client is ready to complete the application, the client will call again for another appointment. At this appointment, the client will pay the fee for service, and then will meet with the Immigration Counselor. The Immigration Counselor will review the items that the client has brought, and assure that they are correct. Then, the client will sign the "G-28" form indicating that the Immigration Counselor is their authorized representative before USCIS, and that all correspondence regarding the case will come through the agency. After this appointment, the Immigration Counselor will spend time alone completing the file and preparing all the information. She will call the client for a final office visit, to sign the application. The application will be mailed to USCIS. The client will be advised that they will be notified of any information that comes from USCIS, and that if they have any questions, they are welcome to call the Immigration Counselor.

The Immigration Counselor will follow up on the case as needed. The USCIS will issue a receipt for the application, and may send a request for further evidence. All these items will be retained in the file, and the client will be notified of them. If USCIS requests additional information or evidence, then it will be collected from the client and sent. If there is an unusual amount of extra work involved in completing the case, an additional fee for service may be required.

A case will be closed once the immigration benefit has been attained, such as the client receiving a Green Card, or once the client has been denied by USCIS, or referred to another source of immigration counseling. The Immigration Counselor will utilize a referral list and a network of other immigration providers for information and referrals.

If the Immigration Counselor encounters an unfamiliar problem or question, she will contact her support at Church World Service, Houston-area colleagues and/or members of the advisory council. Clients with situations too complex for the agency to handle, such as those with criminal background, will be referred to private attorneys who can handle their case.

All fees will be collected up-front, and clients who do not pay their fees will not be able to access services.

Finances

Agencies that are recognized by the Board of Immigration Appeals (BIA) to provide legal services may charge "nominal fees," and can not support their program solely through fees. According to training from Catholic Legal Immigration Network, an agency should try to maintain 50% or less of their income from fees. They also suggested that most agencies across the country charge too little fees, and in almost all cases should raise their fees. The BIA has never given specific guidelines of what are "nominal fees" and has approved fee structures of all different levels.

The Immigration Program will be supported through 50% fees and 50% grants or private sources. Services will be provided only to the extent that resources are available, and there will be no deficit spending. Based on the funding, it will be calculated the number of clients that can be served in a year. Once this number is reached, the agency will refer clients elsewhere until new funding is secured.

Through direct inquiries, it has been found that some of the grants currently held by Refugee Services can be used to pay for immigration services and trainings. They are as follows:

Church World Service R&P Amount: \$XXXX (Services and Training)

\$50 of the per capita amount that CWS gives is derived from donations from their member denominations. It is private cash and may be used to provide immigration services and training.

RSS Employment Amount: \$XXXX (Training)

It has been established that this funding can be used to pay for immigration training. In previous years, YMCA charged up to 1 FTE for their Immigration staff to this contract, with the reasoning that the services help clients keep current on their immigration status, and thus employable. YMCA is currently drafting a letter to inquire whether that can still be done.

Possible Sources of Grant Funding

Interest On the Lawyers Trust (IOLTA)--state program that funds low-cost legal services. YMCA and Catholic Charities receive this funding for their immigration programs.

Texas Bar Foundation--state program that offers grants to low-cost legal services. YMCA, Catholic Charities, and Refugee Services of Texas receive this funding for their immigration program.

RSS Education (Citizenship)--An RSS refugee program that provides funding to help refugees apply for citizenship. YMCA and Catholic Charities receive this funding. This is part of the larger RSS Education grant through which IM receives Cultural Orientation funding.

Possible Sources of Private Funding

Individuals--The agency will work with new board member Charles Foster to locate individuals who know the need for additional low-cost immigration services in Houston, and who are interested in supporting such a program. The debate on immigration reform has galvanized some people's opinions in support of immigrants. If/when immigration reform passes, there should be people willing to "put their money where their mouth is" and make some contributions to the program.

Congregations--Congregations and other community groups are aware of people in need of becoming legal immigrants, and so they may be willing to support the program.

Businesses--Houston business has a huge stake in the immigration issue. An open letter from Texas businessmen was published in newspapers across the state in support of immigration reform. When/if such reform passes, they will have an interest in making sure that their employees, who will go through the legalization process, get quality, low-cost legal services--less trouble with their papers means less time off work. The first name on the open letter was Houston homebuilder David Perry, who is known for making enormous donations to causes he supports. At the CLINIC management training, it was stated that appealing to these businesses owners was "a no brainer."

Costs of Service

Basic formulas will be used to determine the cost of providing services, the cost of staff time, and how much of these expenses should be covered by grants and feeds. For example:

Cost of 1FTE, Gordana Dvorscak, Immigration Counselor
 Annual Salary: \$XXX
 Benefits \$XXX
 Space/Misc. \$3,000
 Supplies \$500
 MG \$7,000
 Total \$XXXX

Billable Hours 40 hours/week x 48 weeks/year = 1920

Staff cost per billable hour for Gordana: \$XXX (rounded to \$xx)

The current seed money, \$xxxx, can be utilized to provide xxx hours of service.

If this covers 50% of the expenses, and fees pay the other 50%, then total fees should equal \$xxxx and pay for an additional xxx hours of service.

Case Mix

The key to fiscal management of an immigration program is dictating the case mix that the agency will accept and work on. This is based on the time that the type of case typically requires, the cost of doing the case, the fees it generates, and the grants that can pay for the service. Below is an example of the kinds of cases that could be accepted assuming the cost of staff hour is \$xx, and assuming grant money of \$xxxx.

		EACH				TOTAL			
Case Type	Cases /Year	Hours	Staff Cost	Paid Grants	Paid Fees	Hours	Paid Grant	Paid Fees	Total Costs
<i>Family</i>	10	4	\$100	\$50	\$50	40	\$500	\$500	\$1,000
<i>Green Card</i>	22	8	\$200	\$100	\$100	176	\$2,200	\$2,200	\$4,400
<i>Citizenship</i>	10	14	\$350	\$175	\$175	140	\$1,750	\$1,750	\$3,500
<i>Work Authorization</i>	20	2	\$50	\$25	\$25	40	\$500	\$500	\$1,000
Total						396	\$4,950	\$4,950	\$9,900

As the program is developed further, greater research will be done to determine the exact cost of a staff hour, as well as the time required to do each type of case. With this information, the desired case mix will

be determined. At the same time, immigration programs typically change their case mix as needed based on community needs as well as agency finances.

Conclusion

Interfaith Ministries has the resources, support, and experience necessary to resume providing immigration legal services. With a careful, conservative approach, the agency can build a program that is sound and healthy. At the same time, the agency will have an opportunity to serve a greater number of clients from the Houston community, as well as create greater long-term stability for the agency.