

February 4, 2015

President's Task Force on New Americans
White House
Washington, D.C.

Submitted via email: NewAmericans@who.eop.gov

Dear Task Force members,

The Catholic Legal Immigration Network, Inc. (CLINIC) supports a national network of community-based legal immigration service programs. This network includes over 260 programs operating out of 397 offices in 46 states, as well as Puerto Rico and the District of Columbia. CLINIC's network employs roughly 1,400 staff, including attorneys and accredited representatives who, in turn, serve over 300,000 low income immigrants each year.

Through its daily interactions with such programs and other faith-based organizations around the country, CLINIC has identified a great need for a coordinated and focused approach to increase the number of immigrant integration programs that exist nationwide. The message of welcoming the stranger is never more needed than right now, as legislative debate continues around measures impacting immigrant communities; charitable legal service programs are experiencing more demand than they can serve; and demographics of cities, large and small, are changing to include our nation's newcomers.

CLINIC is pleased to submit the following suggestions and ideas for consideration into the Task Force's plan for increasing and improving immigrant integration within the United States.

- Create a federal Office of Immigrant Integration. This office would provide training and resources on integration programming options, technical support, and funding opportunities.
- Develop a federal definition of integration and promote it nation-wide. A common definition of integration would allow the language surrounding this topic to become standardized and therefore more meaningful.
- Create a federal standard of performance measures and outcomes that can guide immigrant integration programming and decision-making by cities, states, and other entities working towards this goal.
- Offer federal funding opportunities for integration-related initiatives. This funding could be used for a wide variety of projects, such as increased financial literacy opportunities, English language classes, professional training opportunities, and small business micro-loans.
- Provide support and resources for the creation of new Mayors' Offices of New Americans and other local and state level government initiatives.
- Ensure that faith-based groups are consulted and engaged in the Task Force's work, as religious institutions are often the first responders to immigrants and refugees across the nation.

- Ensure that immigrants are included on this Task Force and provided opportunities to engage in the work of the Task Force in a meaningful way.
- Create state-wide recognition programs that highlight immigrants in each state who have made significant contributions to their communities. This could be modeled after the State Teacher of the Year recognition programs currently in place and include a federal recognition component.
- Create a web-based portal for all available government resources and funding for economic integration initiatives, such as VITA clinics, financial literacy classes, and low-interest loans for home ownership and business ownership.
- Solicit assistance from established groups such as [IMPRINT](#) on ways to assist immigrants and refugees who were professionals in their native countries to re-enter those professions in the United States. IMPRINT is a coalition of organizations that works closely with business, government, higher education, and other partners to raise awareness about the talents and contributions of immigrant professionals. In particular, IMPRINT works to streamline complex professional licensing and re-credentialing processes, and advocate for the adoption of policies and best practices that facilitate the rapid integration of these skilled workers.
- Increase free and low-cost professional development opportunities for ESL teachers by expanding the course offerings in programs such as [ELL-U](#). ELL-U, a free professional development network for ESOL practitioners, was developed through a federally-funded initiative and designed to broaden, deepen, and strengthen the knowledge and skills of educators working with adult English Language Learners.
- Create programs that recognize on a national level the contributions and successes of immigrant members of our community. [The New American Leader Initiative](#) (NALI), a non-partisan organization aiming to increase the number of first-, second-, and third- generation New Americans serving in elective office, is currently working to achieve this goal.
- Work to increase ESL class availability nation-wide by highlighting successful local volunteer-based models, such as [Intercambio: Uniting Communities](#) in Boulder, Colorado. Intercambio: Uniting Communities works towards building understanding, respect, and friendship across cultures through educational and intercultural opportunities. They accomplish this mission through volunteer-taught English classes for adult immigrants, classes and workshops on life skills and citizenship, and cultural trainings and events for all community members.

In addition, the Task Force should engage USCIS in order to continue to support and strengthen its naturalization policies and programs.

- USCIS should continue to fund naturalization assistance and prioritize its naturalization capacity-building grants to organizations that develop programs in underserved areas. The Office of Citizenship grant program should be expanded to again offer capacity building grants for integration.
- USCIS should make a small change to the regulations (8 CFR § 312.2 (b) (2)) to allow licensed nurse practitioners to complete Form N-648 when applying for a disability-based waiver of the naturalization testing requirements. Many of the low income immigrants that we serve receive their primary care from a nurse practitioner, since nurse practitioners are often more accessible

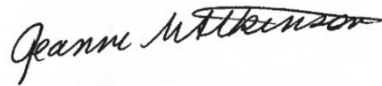
than medical doctors, especially in low income communities. Additionally, due to the acute shortage of primary care doctors, a large and increasing number of states permit licensed nurse practitioners to work independently from medical doctors.

- USCIS field offices should collaborate with courts on ways to improve the dignity and solemnity of naturalization oath ceremonies held at the field offices. USCIS headquarters should provide additional guidance to the field offices in this regard, perhaps a script that could be used for planning the ceremonies.
- USCIS should utilize mobile units and temporary office space in other government buildings to bring services, including application support services and naturalization interviews, to communities with significant numbers of immigrants that are located far away from USCIS field offices. Naturalization applicants in Knoxville, TN, for example, must travel three hours one way to Nashville for fingerprints and eight hours one way to Memphis for their naturalization interviews.
- USCIS must expand oversight of its fee waiver application process to ensure that eligible low income applicants are granted waivers and that denial notices are as specific as possible, so that applicants understand what additional information is required of them.

Thank you for your consideration of these comments. CLINIC supports President Obama's efforts to increase, promote, and expand immigrant integration opportunities in communities across the country. We appreciate the opportunity to contribute ways in which this might be accomplished.

Please do not hesitate to contact CLINIC's Director of Advocacy, Allison Posner, at 301-565-4831 or aposner@cliniclegal.org, with any questions or concerns about these recommendations.

Sincerely,



Jeanne M. Atkinson
Executive Director