CHAPTER ONE
Building Agency Support for an Immigration Legal Program

Learning Objective: To learn how to create a comprehensive business plan for the immigration legal service program and how to garner leadership support for the program.

The decision to initiate or expand an immigration legal program is a serious one. There are different players at every agency and in every community who will need to work together to create or expand an immigration program. Every program, no matter its size or how long it has been in business, needs institutional support in order to survive and thrive. If your agency provides nothing but immigration legal services, you will need a board of directors that understands and supports your work. If you are part of a larger agency, you will need the support of the parent agency as well as its board. This chapter focuses on ways to build and maintain that support.

You will also need the support of individuals and organizations outside your agency: funders, community members, government officials, and the media. Later chapters on funding and external relations will focus more closely on building those relationships, although this chapter will suggest ways to use internal support to build external support for your immigration program.

Making the Decision to Provide Immigration Legal Services

The decision to provide immigration legal services can have profound implications for your organization. It is not a decision that should be made lightly, even if you are already providing social services to immigrants or refugees, or even if the need for such services in your community is compelling. You will need to consider a number of factors, such as:

- Whether the contemplated program and activities would fit within your organization’s existing mission;
- If you are adding a program to an existing organization, whether you have the support internally from your colleagues, board, and parent organization and externally from the key constituencies in your community for undertaking this work;
- If you are creating a new program, whether you have garnered sufficient support externally from your community partners and/or from a faith-based or secular network of nonprofit providers to raise the funds and obtain the technical guidance and training necessary to launch your program; and
- Whether you have a well-thought-out plan for launching or expanding an immigration legal services program.

How to Determine Whether or Not You Are Ready to Provide Immigration Services

Mission Fit

If you are an existing social service agency contemplating the addition of immigration legal services to your program offerings, the provision of such services must be consistent with your agency’s mission statement. The broader your organization’s mission, the more likely it will be that legal services will fit into it. If your agency’s mission is too narrow
Managing an Immigration Program: Steps for Creating & Increasing Legal Capacity

Why We Made the Decision to Provide Immigration Legal Services

“We resettle close to 300 refugees per year in the Archdiocese of Hartford and it was a natural fit to begin doing immigration work and to be prepared for the passing of Comprehensive Immigration Reform legislation. There are so many families in the Archdiocese where the Church is a haven for our immigrants. This has given us an opportunity to relate more to our parishes and to integrate all of what Catholic Charities does especially in meeting the needs of our parishioners and the people within our communities.”

- Rose Alma Senatore, Executive Director, Catholic Charities Archdiocese of Hartford, CT

Agency Resources

Before starting an immigration program, you will need to make sure that your agency has adequate physical space, the tools and equipment needed to offer immigration legal services, library materials, and staff with knowledge of immigration law. You will also need to ensure that you have adequate funding for your program. Chapters Two, Three, Four, Five, and Seven explore these areas in detail.

Making the Case for an Immigration Program

Once you are convinced that you need to add an immigration legal services program to your agency, or that you need to create a new agency, you will need to convince others. This section will explore some of the tools you may use to do that, as well as detailing the different players you may need to approach and how best to make your case to them.

Needs Assessment

An assessment that identifies the need for new or expanded legal services can be a useful tool to gain support from your upper management and/or board of directors. For an immigration program, a needs assessment will likely include demographic information indicating the local population(s) that need services; and information on existing services and whether they meet the immigration legal services needs of the population(s) to be served so unnecessary duplication of services can be avoided.

Demographics

Several resources are readily available to help assess the number of non-citizens, including the undocumented, living in a particular area. The U.S. Bureau of Census American Fact Finder, at www.factfinder2.census.gov, includes detailed census data tracked by city, state, and other criteria. The Center for Applied Research in the Apostolate (CARA) at Georgetown University has issued a study that breaks down U.S. Census data and interprets it in terms of individual Catholic dioceses within each state. Other census reports addressing where immigrants reside and the number of undocumented immigrants are available from the Pew Hispanic Center (www.pewhispanic.org) and the Migration Policy Institute (www.migrationpolicy.org). Grantmakers Concerned about Immigrants and Refugees (GCIR) also has useful demographic information (www.gcir.org). Should your agency have a focus on immigrant survivors of crime and domestic violence, state and local police and district attorneys will have useful crime statistics. The Department of Homeland Security (DHS) maintains a Statistical Yearbook that will also help you fit your community into the broader patterns of immigration into the United States (http://www.dhs.gov/files/statistics/immigration.shtm).

1 The Needs Assessment may be done by an outside consultant (more often the case for start-ups) or by program staff (generally the case for established programs looking to expand or meet new challenges).
Documenting the Need for Immigration Legal Services in Your Community

Along with demographics, you will probably want to show that there is not currently enough capacity to serve the immigration needs of low-income immigrants in your area. While there is no current guide listing all community-based organizations nationwide offering immigration legal services, the Office of Legal Access Programs’ roster of recognized agencies and accredited representatives is a good source for documenting where recognized agency programs are located—and by inference where they are not—and the number of accredited representatives on staff. This listing, organized by state and city, may be found at https://www.justice.gov/eoir/recognition-accreditation-roster-reports.

Use this resource to identify nearby agencies already providing immigration legal services. You may want to talk to these groups while preparing your needs assessment as they may be able to attest to the fact that they cannot handle the entire local need for services. Find out if they have a waiting list and what their limitations are for providing services. You may also use the roster to point out a lack of immigration legal services in your area. Other sources, such as United Way and the American Bar Association, may have demographic information reflecting a lack of services. Your local immigration court, U.S. Citizenship and Immigration Services (USCIS) district office, and American Immigration Lawyers Association (AILA) chapter may also be able to identify the shortage of immigration legal services in your area.

You might also decide to convene a focus group that includes local civil society leaders, such as mayors, members of the board of supervisors, the head of the school district, sheriffs, and police chiefs; public and private health service providers; leaders of faith-based programs and institutions; and program officers at local foundations that support immigrant integration. Such a group could also provide evidence of the need for immigration legal services in your community. Furthermore, convening community meetings made up of these individuals is also a way to develop local support for any new or expanded program and links to possible funding opportunities.

Business Plan

Every program should develop a business plan. Creating one can help you address specifically how you will start up or expand your program. You can also use a business plan as a tool to help motivate and persuade upper management and/or the board of directors of your parent agency to branch out into immigration legal services. A detailed business plan can demonstrate the viability of an immigration legal program. It will make your proposed program look professional, and it can give your upper management and/or board confidence in your ability to manage such a program. You can also use a business plan to demonstrate to funders that your nascent program is professionally run and likely to succeed—and thus worth funding.

Areas to address in a business plan include:

- **Scope of services**
  Lay out the kinds of services your program is planning to provide. Will your services be limited to a fairly narrow range, or will you accept a wide range of cases? Will you provide in-court representation or representation before USCIS only?

- **Staffing needs and structure**
  What kind of staff do you need for your immigration program? Do you plan to hire new staff or re-train current staff?

- **Space, tools and equipment**
  What space, tools, and equipment will you need, and how much will you need to spend on them? If you anticipate having items donated, which items will these be, and who will be donating them?

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**Assessing Local Need for Immigration Services**

“As we were considering adding immigration legal services to our agency’s work, we conducted a comprehensive survey in our diocese. We met with all Catholic Charities case management staff to find out what kinds of client needs they were seeing. We learned that there were two levels of need: significant number of folks had social service, medical, housing, and food needs. A significant number needed immigration information. They were very vulnerable to exploitation based on wrong immigration information. We also met with all 87 parishes in the Diocese and heard of the needs that are presented there. Again there were two levels of need: basic needs and assistance in navigating the immigration system. “

– Bill Hoey, Catholic Charities of Bridgeport, CT
• **Case load**
  What kind of case load do you envision for your program? How many cases will you aim to handle, and what kinds of cases do you plan to take on? What will you do if you hit your maximum caseload? What will you do for cases you are unable to take on?

• **Technical legal support**
  How will you ensure that your staff has access to legal technical assistance for complex cases or case questions?

• **Budget and funding**
  Given your immigration program’s budgetary needs, where will funding for the program come from? What is your plan for program sustainability?

• **Timeline of key events and benchmarks**
  Especially if your program is new, what goals do you plan to meet in the program’s first year?

Instead of creating a separate needs assessment, you may decide to include needs-assessment information within your business plan.

### Whom to Approach About Starting or Expanding Your Program

**Within Pre-Existing Agencies**

Many immigration programs are created within already-functioning social service or legal service agencies. To create, and in some cases to expand an immigration legal program, you will need the buy-in and support of those who run the agency. Nonprofit agencies are governed by boards of directors who serve as fiduciaries and stewards. Depending on the agency’s size and your position, you may need to convince upper management as well.

If you are not the agency’s executive director (ED), cultivating your ED is crucial to success. Demonstrate to your ED both how an immigration legal program would complement the other work being done at the agency; and how compelling the need is for such services in your community. If a legal services program already exists and you are trying to make the case for its expansion, make an effort to involve your ED in community outreach activities, client consultations, or a staff meeting to give her or him greater familiarity with the program.

You will also probably need the support of the agency’s board, especially to launch a new immigration program. If you are the agency’s ED, you will approach the board directly. If you are not the ED, you will need to make your case first to the ED. If the ED supports you, either the ED alone, or you and the ED together, will approach the board to propose adding immigration legal services to the agency’s work.

There are various tools you may use to garner this support. It is almost always a good idea to prepare a business plan for your program. You may also choose to do a needs assessment. If your board and/or ED are not already convinced of the need for immigration legal services in your community, a needs assessment can add weight to your recommendations.

Beyond the logistics of the needs and how you will address them, you may need to address less than welcoming attitudes about immigrants and immigration legal services. Remember that not all social service organizations view the provision of immigration legal services as an extension of the work they already do. Some are wary of the requirements, liability exposure and political risk associated with legal work. Others are unclear about how legal work differs from other social service work. Others are willing to work with immigrants they see as “good”—refugees and asylees—but not with others they see as “bad”—undocumented people.

You may need to address such attitudes directly to convince the ED and the board to support legal work for immigrants. Faith-based agencies have a wealth of scriptural and doctrinal resources to rely on in supporting newcomers regardless of their legal status. Other groups ground the equal treatment of immigrants and refugees in human rights law and practice. Common to faith-based and sectarian nonprofits is the recognition that immigration legal services benefits immigrants and communities by: defending rights; advancing people’s immigration status; unifying and strengthening foreign-born and
native-born families; increasing the number of young workers in the country; increasing the number of U.S. citizens eligible to vote and participate in the country’s democracy among many other important outcomes. Proponents of an immigration legal services program may have to work hard to explain to the board and/or upper management what is involved in immigration legal services, and why that work is relevant to the agency’s broader social service agenda. You may already have supporters for an immigration legal services program on the board, particularly an immigration attorney. It is important you reach out to those board members so they can help advocate for the immigration program to other board members.

A business plan and needs assessment are powerful tools to help convince your board of the need for immigration legal services, and of your agency’s ability to deliver such services. The board may want to know why the agency’s current work for immigrants is no longer sufficient. The board may want to know who else in the community is doing immigration work, and if there are other organizations, why they are not able to meet the need for services. Some of the factors that board members may be especially interested in hearing about might include:

- What increased liability will an immigration program bring, and how will the agency handle that?
- What kind of insurance will the agency need for an immigration program?
- What will the program cost, and where will the money come from?
- What are the hiring requirements for an immigration program?
- How will legal work intersect with the agency’s other program areas?
- What are the public relations consequences?

**At a Start-Up Agency**

If you are committed to starting a new nonprofit organization to deliver immigration legal services, you will face a somewhat different set of challenges. You will not need to make your case to management and a board; rather you will need to recruit a board that shares your vision and is willing to work toward it. At a new agency it is especially crucial to create a strong business plan. You may also find that a needs assessment helps in convincing potential board members to join your organization.

In addition to legal requirements, a start-up organization will need to assemble a board of directors. A diverse board comprising representatives from key community constituencies, individuals with professional backgrounds relevant to the organization’s operations (such as law, accounting or nonprofit management), and potential donors or citizens of stature in the community will be an asset to the organization.

**Board Involvement and Development**

To the extent that you can participate in the life of the agency beyond your program, it is important to do so. You can inform and educate the agency as a whole, including board members about immigration issues. It is important that board members are educated about their responsibilities. Ask your executive director if it is possible to give a presentation to the board members on the kind of work your program does and the clients it serves. Invite board members to events held by your program and allow them to meet and hear from clients. This will help you identify someone who can be an advocate for your program at board meetings. Once they see the work that you do and hear what the needs of the community are they can speak more effectively about your program on your behalf to other board members who might not be as supportive. This will also give them a personal connection to your program that they can share with friends and colleagues to garner additional support for your program. Getting a board member excited about what you do will enable him or her to fight for your program in the future.
Whom to Include on Your Board

If you are starting a new nonprofit, you will need a board of directors. If you work in an existing agency, your ED may want to work to add new members to the board who will be able to contribute to the work of the immigration program. You will want a mix of different talents and abilities on your board. Remember that a board should not be composed solely of your friends, but of a wide range of people who will make tangible contributions to the program. Some qualities to look for when recruiting board members include:

- Personal reputation as “pillars of the community”—people who will stand by the program are crucial where community support is especially important to your success;
- Financial means and/or connections to people with means, along with the willingness and ability to use those connections;
- Skills that will be of help;
- Willingness and ability to publicize your agency’s work and need for support;
- Absolute commitment to the mission—you need board members who believe strongly in your agency’s work and will be motivated to work hard to help the agency succeed;
- Affiliation with colleague organizations that do complementary work—consider including staff from organizations whose work complements your own, as this may lead to fruitful collaborations; and
- Membership within the dominant user group whose voice you want represented—i.e., an immigrant community leader/member.

It is generally a good idea to have on your board a mix of people with resources or access to resources, and people who know and understand your work. All board members should be strongly committed to the agency’s work.

There are many online resources available to nonprofits on board creation and development. These include:

- www.boardsource.org
- guidestar.org (see www.guidestar.org/news/features/question_may06.jsp#1 for an excellent article on finding effective board members)
- www.idealist.org

Advisory Boards

It may be useful for the immigration legal services program to set up a board of advisors, particularly if the board of the parent agency has little expertise in running such a program. Drawing a diverse group of advisors from your community (attorneys from law firms, academics, American Immigration Lawyers Association members, former clients, representatives of immigration advocacy groups) can provide added support and guidance. The advisory board can provide substantive expertise, marketing advice, and resource development assistance. If you do create an advisory board, clearly establish its role and how it will relate to the agency.

**Board Members with Vision**

“An immigration board member should ‘catch the vision’—someone who knows and cares about immigration issues. I’d include some outside people such as from Legal Aid organizations and advocacy organizations, as well as from American Immigration Lawyers Association (AILA).”

– Sue Colussy, Immigration Program, Catholic Social Services Inc., Atlanta, GA
How Our Advisory Committee Helped Us

“Our advisory committee consisted of a local Jesuit priest with a great deal of knowledge and experience with immigration, several private immigration attorneys, staff from the International Institute, some volunteers from the community, and our CLINIC Field Office Attorney. The committee was very helpful in convincing the board that this wasn’t just social work-do-gooders: it validated for the board and the diocese that this was the right thing to do. The advisory committee represented a world-view from outside the agency.”

– Bill Hoey, Catholic Charities of Bridgeport, CT

Securing and Maintaining Agency-Wide Support

Running a successful immigration legal services program within a larger agency requires working with the parent agency to ensure that the program receives the institutional support it needs. A smooth working relationship between the parent agency and the immigration program is critical.

Overhead and Allocated Costs

Establish what services the agency expects the immigration program to perform and what services the agency will perform in return. Agencies usually charge subsidiary legal immigration programs overhead and allocated costs—typically a percentage of the program’s budget—for services such as accounting, resource development, marketing, support, space, and case referrals.

Communication

Develop a regular mechanism to discuss important issues with the parent agency. This will avoid surprises on either side. Periodically share success stories and statistics with the parent agency to update them on the importance of your work.

Priorities

Ensure that the immigration program knows the agency’s priorities and vice versa. If immigration services are not one of the agency’s priorities, work to make it one. Some social service agencies view immigration services as ancillary rather than central to the agency’s mission. This puts immigration programs on precarious footing. Ensure that other agency components understand the many benefits of the immigration legal program to their own clients.

Buy-in from the Rest of the Agency

If you are not the Executive Director, work with the ED so that he or she will ensure that other divisions in the agency understand as much as possible about the immigration program. This is especially important where there are other programs that can complement the immigration program’s work, and vice versa. For example, one executive director prioritizes bringing together heads of the refugee resettlement program and the immigration program to ensure they work in tandem.

Questions to Answer in Building Agency Support

Program directors frequently fulfill many roles in a non-profit organization. They are often expected to serve on a senior management team to help the organization fulfill its mission and plan strategically. Program directors certainly have responsibilities for program design, supervision, evaluation and financial sustainability. In addition, some program directors provide direct services themselves. As such, persons fulfilling all of these roles may be at times in positions of confusion or conflict. It is helpful for program directors on a regular basis to pause and ask some deliberate questions.
• How can I educate the agency’s executive director and board about the legal needs of immigrants and the value of our program’s services?

• What client case studies will be most reflective and persuasive?

• What information does the agency’s leadership need to be more committed to legal immigration services?

• How can the program’s list of services be justified if ever questioned due to threat of budget cuts?

• How can the immigration program receive agency help in resource development?

• How can our legal services be better profiled in agency-wide publications and local media outlets?

• Does the agency have an emergency planning process in case of major changes in immigration laws?

• Is the staffing pattern per work load overwhelming and causing unnecessary strain. Can the program afford to add another staff person, possibly a supervisory staff attorney, for the first time?

• How should client fees be calculated given the program’s budget?

• Is a program sub-office needed to serve more clients effectively? If yes, how can it be supported?

• Is there an unmet need in the community that our agency should also be addressing?
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 Board of Immigration Appeals (BIA) within the Department of Justice (DOJ). 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 U.S. Citizenship and Immigration Services (USCIS). 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 (U.S. 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.

**DOJ-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.

**Community Providers of Legal Immigration Services**

Currently, there are many for-profit immigration attorneys in Houston, most of who 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 having highly qualified staff and best for complex cases, but more expensive than the others. YMCA is viewed as accessible and affordable, and The Alliance is viewed as another expensive option. Interfaith Ministries has a reputation in the refugee community of providing quality, thorough, and compassionate services - a reputation which will draw clients.
Market Strategy

A marketing plan needs to be devised to help the Immigration Program increase its visibility and desirability within the immigrant social service communities. The plan needs to help the program determine which steps are most effective and affordable to pursue. A marketing plan could be developed through the assistance of a marketing firm on a pro bono or sliding scale basis or a non-profit consulting group assisting other non-profits. Marketing will need to be invested in and evaluated on an on-going basis.

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 provide 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

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2 Fees listed are reflective of when the actual business plan was first written and are not intended to be recommendations for any program’s fee schedule.
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, and 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 DOJ 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 Guilfoyle, attorney, Church World Service, New York
Wafa Abdin, 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

Policies and Procedures Manuals

Prior to services being delivered, it is essential that the immigration program’s policies be documented in a manual for the agency leadership to endorse and staff to follow. The policies should include: agency’s mission statement; program’s service philosophy; program operations; services provided and locations; eligibility criteria; confidentiality and conflicts of interest; client rights and responsibilities; client grievance policy, supervision, staff qualifications and functions; and program evaluation. The manual should be read and updated at least once a year, and more often in the first year as the program unfolds.

To provide clients with quality legal immigration services, carefully planned and documented case management forms and procedures are needed. Forms will include: Consultation Form; Referral List; Intake; Client Agreement; Fee Schedule; Fee Waiver and Sliding Scale Agreements; Required Documents Checklist; Case File Construction Checklist; Quality Control Checklist; and Termination Letter template among others.

These two sets of documents will help ensure professionalism, quality services to clients and program sustainability. They will assist in training new staff as the program expands.

Finances

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 fees. For example:

Cost of 1FTE, Gordana Dvorscak, Immigration Counselor

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Salary</td>
<td>$XXX</td>
</tr>
<tr>
<td>Benefits</td>
<td>$XXX</td>
</tr>
<tr>
<td>Space/Misc.</td>
<td>$3,000</td>
</tr>
<tr>
<td>Supplies</td>
<td>$500</td>
</tr>
<tr>
<td>MG</td>
<td>$7,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>$XXXX</strong></td>
</tr>
</tbody>
</table>

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.

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

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.