The DACA Era and the Continuous Legalization Work of the US Immigrant-Serving Community

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Preface

In June 2016, the Center for Migration Studies of New York (CMS), with support from the Open Society Foundation's Emma Lazarus Fund II (OSF / ELF II), initiated a study on the work of non-governmental and community-based organizations (NGOs and CBOs) and their public and private partners to build capacity and to prepare to implement a large legalization program. Over a three-month period, the CMS team interviewed more than 40 agencies and 66 individuals, and intensively analyzed the work of five communities on the Deferred Action for Childhood Arrivals (DACA) program, expanded DACA (known as DACA-plus), and Deferred Action for Parents of Americans and Lawful Permanent Residents (DAPA). The study assessed the progress of the NGO/CBO community in building capacity to promote maximum participation in DACA, to enlist DACA beneficiaries in service, advocacy and community organizing work, and to prepare for a future large-scale legalization program. The study covers the period from DACA's inception in 2012 to the eve of the presidential election.

The prospects for any kind of legalization in the short term have darkened with the election of Donald J. Trump, and the prospects for widespread and potentially draconian enforcement actions have heightened. Although this project was commissioned, conceived, and executed with a legalization program in mind, its findings on the capacity of the immigrant-serving sector remain timely and relevant. This report presents a narrative of how the sector developed over the past four years and assesses its capabilities. As such, it presents a valuable catalogue of assets as the sector considers how it will respond to the challenges ahead. Building greater capacity to serve immigrant communities has become an even more urgent task since the presidential election. Recommendations formulated for a potential legalization program can serve as a starting point for the development of strategies to contend with the Trump administration's immigration and refugee policies.

Findings

Working within the existing statutory and administrative frameworks of federal policy, the immigrant-serving sector has achieved steady and significant gains in legal status for large numbers of immigrants over the past four years. These gains, which have been the result of an ongoing, intentional process of growth and professionalization in the immigrant-serving sector, have constituted a de facto legalization program. While most communities across the country lack sufficient capacity even to meet existing needs, substantial and varied capacity has been built over the last four years and well-tested models are available to expand capacity if the resources become available.

Strengthening and expanding existing capacities in the immigrant-serving sector would be: 1) the most efficient preparation for a large-scale legalization program; 2) an effective antidote to the ravages of draconian enforcement policies; and 3) an important step in promoting the full participation and integration of immigrants in our nation's life.

When the DACA program was launched on June 15, 2012, many participants in the immigrant-serving sector rose to the challenge by redirecting staff, physical assets, and networks of collaborators. After long work on naturalization campaigns, special programs for other discrete groups, and direct assistance to individuals, the sector had many of the necessary capacities in place although not at the scale required by a program of DACA's dimensions. Going forward, the best response to both challenges and opportunities would be a similar process of growth and evolution. These conclusions are derived from a study that assessed what has been accomplished in the four years since DACA's inception, the capacity of the immigrant-serving sector, and steps that might be taken to increase that capacity in advance of a hypothetical legalization program. A key finding relevant both to the original analysis and to an effective, coordinated response to the enforcement initiatives of the Trump administration is that there is already widespread engagement by the immigrant-serving sector with the large share of US undocumented residents (likely in the 15-20 percent range) who are eligible to pursue a permanent immigration benefit or relief. Our study found that existing screening and assistance mechanisms are helping many to achieve legal status and to graduate to lawful permanent resident (LPR) status and citizenship.

If properly supported and expanded, the immigrant-serving community could "legalize" and improve the lives of hundreds of thousands of undocumented immigrants, even without a change in the law. Such an initiative would steadily and significantly reduce the number of people who are vulnerable to detention and removal. Looking beyond the immediate future, it would also reduce the size of a future legalization pool, easing both the course of legislative enactment and implementation of a legalization program. In addition, it would expand standing capacity for a legalization program and afford program beneficiaries access to justice without waiting for Congress to pass immigration reform.

Taking this finding as a starting point yields a depiction of capacity as being drawn from many different kinds of initiatives by many different kinds of entities in response to the needs of diverse immigrant populations. The constellation of processes, immigrant-serving entities and constituencies varies significantly from place to place across the country as does the extent and quality of capacity. But the consistent impression is of work that is underway and yielding results. Whether the intent is to expand capacity for defensive reasons or to take advantage of a large-scale legalization program, our study demonstrates that much can be accomplished by building on what is already in place. Even in communities where current needs are great, infrastructure and effective models can grow with added resources.

From this perspective, preparation for either a legalization program or an enforcement crackdown is not viewed as the launch of a new endeavor, but instead is seen as the extension of efforts long underway. This perspective crystalizes around the realization that the immigrant-serving community has developed capacity and expertise to help hundreds of thousands of immigrants to gain or improve their legal status each year in the normal course of their work.

Many NGOs and CBOs, offer a variety of services to immigrants, including social, educational, and employment, which can segue into legal screening or lead to improved legal prospects. Likewise,

the immigrant-serving sector has repeatedly mobilized to provide specialized services based on immediate priorities, such as with naturalization campaigns, or because unexpected needs have arisen, as with the settlement of Central American minors, or because of new policy initiatives aimed at special populations like DACA beneficiaries. Over the years, these programs for special populations have served not only as laboratories to develop and test many of the sector's essential tools (e.g., group processing, public education, and extensive partnerships), but also as production sites for the creation of capacity that can be directly applied to future challenges. These initiatives have tended to be sporadic, leading to an ebb and flow in resources and capabilities, especially in trained personnel. But the inconsistency primarily reflects the nature of funding rather than the flagging commitment of the organizations and individuals involved or fluctuating demand for services. The essence of future capacity building thus lies in consistent bolstering of present capacity.

Over the first four years of DACA's implementation, the immigrant-serving community built capacity in many ways, but far more capacity would be needed to implement a large legalization program, to legalize all of those who may already qualify for an immigration benefit or relief, and to insulate and defend immigrants from President Trump's immigration policies.

Among other forms of capacity, the DACA era has seen:

- a substantial increase in nonprofit legal service capacity, including increases in immigration attorneys, Board of Immigration Appeals (BIA) recognized agencies and satellite offices, and accredited representatives;¹
- increased expertise on immigration law and process through rigorous training and mentoring;
- a “whole of community” approach to service delivery and advocacy, reflected in greater partnerships, new working relations, state and local leadership, a stronger division of labor among diverse institutions, and collaborative programs that can pivot to large legalization or to more defensive programs;
- greater engagement of DACA recipients and immigrant communities in program implementation and advocacy;
- the expansion of trusted and established community organizations, immigrant youth-led organizing agencies and other NGOs/CBOs that can serve as pillars of legalization planning and implementation;
- technology and other innovative tools and processes to expand and improve services and educate immigrant communities, self-filers, and NGOs/CBOs; and
- use of detailed, publically accessible demographic information on the undocumented, potential program beneficiaries, and naturalization-eligible.

Clear limitations and challenges also emerge from this assessment. The leading NGO and CBO networks on legalization readiness have not yet reached the “outward circle” of agencies to

1 Oversight of the process of Board of Immigration Appeals (BIA) “recognition” for charitable agencies and “accreditation” — which allows qualified non-attorneys at “recognized” agencies to represent immigrants before the Department of Homeland Security (DHS) and in immigration court — is expected to be transferred soon from the BIA to the Executive Office for Immigration Review's (EOIR) Office of Legal Access Programs (OLAP).

which many immigrants turn for support and guidance. If properly engaged and channeled, these entities would be a source of additional capacity.

The absence of a robust literature on immigrant-serving agencies and special immigration programs for particular groups contributes to a lack of institutional memory regarding this work and, as a result, undermines the immigrant-serving community's efforts to achieve its goals, to generate sustained increases in service, to build capacity, to institutionalize best practices, and to empower those it serves.

And, misconceptions and misinformation about the undocumented, in turn, impede an honest debate on the merits of immigration reform proposals and present an obstacle to the kind of integrated, "whole of society" approach necessary to maximize the success of a large-scale legalization program.

Recommendations

This analysis suggests that the immigrant-serving sector has opportunities to prepare for future challenges in a number of areas. Our recommendations fall into three categories: (1) investment in existing programs; (2) growth in capacity; and (3) improved education.

The immigrant-serving community should continue to pursue widespread screening of the undocumented and initiatives targeted at special populations in order to prepare for a large legalization program, as de facto legalization programs in their own right, and as an antidote to massive enforcement and removals.

- The NGO and CBO community should invest substantially in screening the undocumented for immigration benefits and relief. Rigorous screening, coupled with representation of those found to be potentially eligible for immigration status, should be seen as a legalization program in its own right, which will offer a modicum of protection from removal and benefit any future legalization program.
- The immigrant-serving community should work to sustain multi-agency, service-delivery initiatives for special populations of immigrants. This work represents an important legalization readiness strategy and a form of legalization that deserves broad support.

Immigrant-serving organizations need to bring to scale all the forms of capacity relied upon and expanded during DACA.

- All of the forms of capacity built and expanded during DACA need to be brought to scale in preparation for a large legalization program, including legal capacity, community-wide partnerships, municipal leadership, civic engagement of immigrants, new and improved technology, and publically accessible demographic data.
- The immigrant-serving community should map, engage, train, and properly channel the outer circle of trusted community institutions to which immigrants turn for guidance and support. These entities constitute another potential source of legalization capacity.
- Immigrant-serving agencies should expedite the development and use of technology to expand service-delivery capacity and public education. New technology should include

safeguards to protect against the unauthorized practice of law (UPL) and ensure that immigrants with complex cases are referred to qualified attorneys or experienced BIA-accredited representatives. There is an urgent need to expand the use of technology in rural communities and the use of case management software throughout the nation.

Immigrant serving communities should inform and educate immigrants, lawmakers, policy influencers, researchers, and the general public on the benefits and components of a successful legalization program.

- DACA, DACA-plus, and DAPA outreach and public education have covered not just program eligibility requirements and community resources, but underlying public fears about the undocumented, misconceptions about the legalization process, and opportunities for civic engagement by DACA recipients. Public education — not just of affected communities, but of the entire community — should be a central legalization readiness activity.
- The widespread victimization of immigrants by *notarios*, immigration consultants, and unscrupulous attorneys is more than a public education challenge. It merits a political and law enforcement response commensurate with the need.
- The federal government, states, localities, businesses, and foundations should fully fund legalization planning, outreach, and implementation work by the immigrant-serving community.
- The philanthropic community and federal, state, and local government agencies should fund and publicize research that documents the successes, challenges, and failures of large legalization programs and other service projects for special, more discrete populations. Longitudinal research on the socioeconomic attainment and political empowerment of legalization beneficiaries and their families also deserves support.

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I. Introduction

In June 2016, the Center for Migration Studies of New York (CMS), with support from the Open Society Foundation's Emma Lazarus Fund II (OSF / ELF II), initiated a study on the readiness of non-governmental and community-based organizations (NGOs and CBOs) and their public and private partners to implement a large-scale legalization program.² Over a three-month period, the CMS team interviewed more than 40 agencies and 66 individuals, including members of the Committee on Immigration Reform Implementation (CIRI) and a range of legalization stakeholders in five communities.³ The report refers to these entities as "study participants," "respondents" and "immigrant-serving agencies," although they engage in far more than "service" provision.⁴

The report comes at an important juncture in the public debate over immigration reform. Among other milestones in the legalization debate, it has been:

- more than a decade since Congress first considered a comprehensive immigration reform (CIR) bill, and since the NGO and CBO community held its first gatherings on CIR planning and implementation;
- four and one-half years since President Barack Obama on June 15, 2012, announced the Deferred Action for Childhood Arrivals (DACA) program;
- three and one-half years since the US Senate on June 27, 2013 passed the Border Security, Economic Opportunity, and Immigration Modernization Act of 2013, which the House of Representatives refused to consider;
- more than two years since President Obama on November 20, 2014, frustrated by Congress' failure to pass CIR, announced the creation of the Deferred Action for Parents of Americans

2 The team consists of Donald Kerwin, CMS's executive director; Roberto Suro, professor of journalism at the Annenberg School for Communication and Journalism and the School of Policy, Planning, and Development and director of the Tomás Rivera Policy Institute, University of Southern California (USC); Daniela Alulema, CMS's administrative coordinator and researcher; Tess Thorman, Master of Public Policy (MPP), 2016, USC Sol Price School of Public Policy; Robert Warren, a CMS senior fellow; Lynne Turner, doctoral student in sociology, City University of New York Graduate Center; Yadira Antonio, MPP candidate, 2017, USC Sol Price School of Public Policy; and Stephanie L. Canizales, doctoral student, Department of Sociology, USC David and Dana Dornsife College of Letters, Arts, and Sciences. Thanks as well to Tom Wong, assistant professor of political science and director of the International Migration Studies program minor, University of California, San Diego, who served as a consultant to this initiative, and Mackenzie Seaman, a CMS intern, for her research and analysis of BIA recognized agencies and accredited representatives. Appendix B describes the study's methodology in greater detail.

3 Study participants include nonprofit legal service providers, community organizers, communications and media experts, funders, advocacy groups, local government officials, faith-based entities, labor unions, and legal support agencies.

4 The report assumes a high level of familiarity with the relevant programs and issues and, thus, focuses primarily on lessons, findings, and recommendations.

and Lawful Permanent Residents (DAPA) program and the expansion of the DACA program (known as DACA-plus);

- nearly a year since the February 16, 2016 decision by US district court Judge Andrew Hanen to temporarily enjoin DAPA and DACA-plus;
- six months since the Supreme Court in *United States v. Texas* deadlocked in a four-four decision that left the injunction in place, halting or delaying DAPA and DACA-plus at least until the next president appoints a ninth Supreme Court justice; and
- one month since the election of Donald Trump as president of the United States.

While NGO/CBO planning for CIR began in the mid-2000s (Shea 2006), over the last five years an unprecedented coalition of local, national, and regional NGOs and CBOs have worked intensively to ensure high DACA application and approval rates and to prepare for a large-scale legalization program. During this time, these groups have expanded nonprofit legal immigration, public education, and organizing capacity. Through the creative use of technology, they have also leveraged the work of immigrant-serving agencies, assisted self-filers, and increased public education on DACA and DAPA. Many networks have also prioritized the civic engagement of program beneficiaries. Virtually all have sought to combat fraud by unscrupulous and unauthorized legal practitioners. Much of this work has been supported nationally by CIRI, a coalition of diverse networks and agencies devoted to legalization readiness work.

The CMS study has sought to assess the progress of the NGO/CBO community in building legal, public education, and organizing capacity in order to ensure maximum participation in DACA, to prepare for a future legalization program, and to enlist DACA beneficiaries and others in service, advocacy, and community organizing work. The study mostly covers the period from DACA's inception to the present. The DACA, DAPA, and DACA-plus programs serve as its frame of reference.

II. The Development of Legalization Capacity Since 2012

For decades an array of civil society institutions has been helping immigrants to gain legal status and to graduate to lawful permanent resident (LPR) status and US citizenship. This activity has come in many forms and from many different kinds of organizations. Millions of immigrants have benefitted. Legalization capacity is best understood as growing out of a rich ecology of services and advocacy, and, as in nature, this ecology has evolved with broad trends as well as multiple niches and variants.

Viewed from this perspective, DACA implementation, the settlement of Central American minors, naturalization, and planning for DAPA, DACA, and DACA-plus are seen as climaxes in a narrative of continuous engagement with immigrant communities. These episodes have not only added capacity but have also periodically reordered priorities and competencies. Between the surges, the ecology of service has continued to develop and grow. Seemingly unrelated tasks like assisting undocumented drivers to secure licenses, registering naturalized citizens to vote, or helping immigrants to apply for health coverage have contributed to latent capabilities that can be mustered and redirected when necessary.

Rather than see preparedness for a future large-scale legalization program as the ability to create specific service delivery operations in response to specific program requirements, we take a broader view. Our research has illuminated an array of social actors at the national, regional, and local level that operate with varying degrees of coordination and that are already undertaking many of the most important functions of a legalization campaign. The response to a new challenge of great magnitude, as it has been in the past, will be a surge in activity by an existing ecosystem rather than the creation of a radically new entity. And, while it is important to examine individual components, the capacity to implement a legalization program is not contained primarily in specific individuals or structures designed for that purpose. Instead, what will matter most is the sum of the parts and the ability to substantially expand the diverse networks that comprise the immigrant-serving community and to mobilize them to take coordinated action.

President Obama's announcement of DACA on June 15, 2012 initiated the first nationwide effort to help an entire category of undocumented immigrants gain a form of legal status since the implementation of IRCA. It therefore serves as an important benchmark. This analysis focuses on the story of capacity development since then. Seen through the conceptual framework described above, however, DACA punctuated the current era of capacity building but did not initiate it.

[DACA] has opened up so many opportunities for me and my family. Now I have the ability to go to school and study for something that I will actually want to do and I have passion for. I have a driver's license. I can take my parents to jobs. I can drive my little sister to her school. I have the ability to do [these things] without fear of deportation.

DACA recipient

Our analysis begins with a detailed assessment of two of the ongoing processes that have contributed to growth in capacity: widespread screening as a route to legal status for the undocumented and service to special populations as a means of building capabilities to serve potential legalization beneficiaries. We then examine capacity building in several key sectors of activity, as well as strategic approaches that have led to growth in capacity across an entire community.

1. Screening the undocumented for immigration benefits and relief represents a legalization program in its own right, an important legalization preparedness initiative, and an antidote to draconian enforcement policies.

Implementation of DACA over the past four years has underscored the degree to which being undocumented is a fluid condition. Individual noncitizens with legal status can easily become undocumented, and many undocumented can, in turn, develop eligibility for some form of legal status during their tenure in the United States. While this was already well-known to those providing legal representation to immigrants, the large-scale processing undertaken with DACA created a much broader awareness of the grey or transitional status that many immigrants inhabit. More importantly, the DACA era has produced a greater awareness of the opportunities that the relatively fluid and provisional nature of lacking immigration documents presents for moving large numbers of individuals into a form of legal status without having to wait for new relief by way of statutory reform or executive action. For this reason, legal screening and representation

should be considered a legalization program in its own right and, in fact, the most consequential legalization program currently available.

A national survey of immigrant-serving organizations found that 14.3 percent of DACA-eligible persons were potentially eligible for an immigration benefit or relief that would put them on a path to permanent legal status (Wong et al. 2014). With one exception, study participants thought that the 14.3 percent figure understated the percentage of undocumented persons potentially eligible for some form of status. Estimates typically ran in the 20 to 25 percent range. Respondents reported that a significant percentage of DACA applicants is potentially eligible for permanent relief like U visas, Special Immigrant Juvenile visas, family-based immigration, relief under the Violence Against Women's Act (VAWA), and even derivative citizenship.⁵ A multi-agency event sponsored by the Mayor's Office for Immigrant Affairs (MOIA) in New York — a city with substantial immigrant legal service capacity and, thus, greater opportunities to legalize than other communities — found that 38 percent of those screened were potentially eligible for a non-DACA immigration benefit.

We found that many study participants incorporated full screening for those filing initial DACA applications and renewals of DACA, and national legal support agencies trained and encouraged their networks to provide this service. In some cases, screening and representation have been extended beyond the DACA process to encompass broader swaths of the immigrant population. According to the respondents, the practice has consistently rendered unexpected benefits.

If someone is eligible for a permanent form of relief, it's critical that they know that so that they can weigh their options.

- Legal service provider

Long case backlogs, aging out of eligibility, biased immigration court judges, low income, and individual circumstances can prevent “potentially eligible” persons from securing a benefit or relief. However, it is also true that the percentage of an undocumented population that *becomes* eligible for an immigration benefit or relief over a span of time — like the four-year period since DACA's inception or the time it will take Congress to pass a large legalization bill — would be far higher than the percentage found to be eligible at a *particular* point in time. Between 1982 and 2012, 19.5 million foreign-born persons joined the US undocumented population, but by 2013 only 11 million of this group remained undocumented. The others had left the United States either voluntarily or through removal, died, or obtained legal status (Warren and Kerwin 2015, 98). The undocumented are also heavily represented in the estimated 4.4 million persons mired in visa backlogs, but with a confirmed family relationship that would qualify them for a visa (Bergeron 2013, 7). Moreover, a high percentage of new legal immigrants each year have previously been out of status (Jasso et al. 2008, 820-26). Nearly one-third of new legal immigrants in 1996, for example, had a previous “illegal experience” (ibid., 821).⁶

DACA expanded educational, employment, and civic engagement opportunities for recipients. Yet its benefits were not evenly shared. “Low-income, low-skilled youth” were less able to access

5 One Houston agency found that many clients who qualified for permanent immigration status or relief saw DACA as a faster, cheaper way to obtain work authorization and, thus, they first applied for DACA, with the intention of later seeking permanent status.

6 Removal is an unnecessary and particularly harsh option for persons who are already on a path to legal status.

the program than others (Gonzalez and Bautista-Chavez 2014, 8). Many potential DACA-eligible persons have not pursued legal status because of high application and attorney costs, insufficient nonprofit immigrant-serving capacities, lack of information, fear of the potential consequences, and confusion regarding the educational requirements. These same factors prevent those who may be eligible for a permanent immigration benefit or relief from pursuing it. In these circumstances, legalization should be viewed, at least in part, as an “access to justice” issue. Immigrant-serving agencies are particularly important to low-income immigrants at risk of losing status and to undocumented immigrants who should be on the path to legal status, but are not. And, of course, persons with immigration status are far less likely to be deported than the undocumented.

We are not screening as much as I would like, but that is because we just don't have the capacity. If we had more capacity, we could do a lot more in-depth screening.

- Attorney at community development agency

2. The work of immigrant-serving agencies in accommodating “special” immigrant populations has been an effective legalization preparedness strategy and deserves consistent support as a legalization program in its own right, which will put program beneficiaries beyond the reach of enforcement initiatives.

While IRCA was the nation's last “general” legalization program, many immigrant-serving organizations have long experience in helping to legalize large populations of immigrants through a variety of models (including group processing) and with diverse community partners. These programs legalize undocumented persons and assist legally present immigrants to advance toward citizenship. Through administrative advocacy and federal litigation, these organizations also seek to expand program eligibility, contest narrow interpretations of the law and onerous evidentiary requirements, and at times (as with DAPA and DACA-plus) preserve Executive action initiatives that benefit immigrants.

Collaborative naturalization initiatives have been a staple of immigrant-serving agencies, both legal agencies and community organizers, for at least a quarter century (Chenoweth and Burdick 2007, 101-18). During this period, these entities have naturalized millions of persons and contributed to broader social goals like preserving eligibility for public benefits, voter registration, and homeownership. Massive naturalization application surges in the mid-1990s and 2007 were spurred (respectively) by the large pool of naturalization-eligible persons who obtained legal status under the Immigration Reform and Control Act of 1986 (IRCA), the passage of immigration enforcement and welfare reform laws in 1996, and anticipated application fee increases in late 2007 (Krogstad 2016). Concerted naturalization campaigns also contributed to the high filing numbers. Since 2000, naturalization rates among foreign-born US residents have increased (NAS 2016, 164), which has been a longstanding goal of the NGO/CBO community. In addition, respondents reported a surge in applications as a result of Donald Trump's presidential campaign.

Most recently, the New Americans Campaign (NAC) program has streamlined access to and made naturalization a coordinated and sustained priority in select communities throughout the nation. Many study participants praised NAC as a particularly effective collaboration because many of the capabilities developed for naturalization — such as public education and outreach,

coalition building and conducting group processing events — are applicable to other immigrant-serving programs, including legalization. State-funded naturalization programs in California (One California), Illinois (Refugee and Immigrant Citizenship Initiative), Washington state (Naturalization Services Program and New American Program), and elsewhere have been particularly valuable in building this kind of capacity.

Meanwhile, there are numerous instances of special programs that allowed discrete groups of immigrants to gain or improve their legal status. Legalization eligibility, for example, effectively increased after Congress moved forward the visa petition filing date for eligibility for adjustment of status under Section 245(i) of the Immigration and Nationality Act (INA) from January 14, 1998 to April 30, 2001. As a result, tens of thousands of persons who did not want to travel abroad for visa processing for fear they would not be able to return to the United States were able to apply for LPR status in the United States. In addition, in 2015, the Congressional Research Service reported that more than 300,000 foreign nationals benefitted from temporary protected status (TPS) (Segehette et al. 2015). TPS populations can be densely concentrated, including Salvadorans in the Washington, DC area and Long Island, and Haitians in South Florida, Brooklyn, and Boston. Registration and renewal of TPS for these groups represent a recurrent challenge for immigrant service agencies in heavily impacted communities.

Over the years the immigrant-serving community has also accommodated a steady stream of legalization programs as the result of legislation that extended status to the undocumented or made discrete groups eligible for LPR status. More undocumented residents have legalized since 1986 through population-specific legalization programs, than through IRCA's "general legalization" provisions (Kerwin 2010, 12-13).⁷ Immigrant-serving agencies have successfully implemented these smaller legalization programs, with little fanfare or attention.

We had a fair amount of experience doing mass processing from TPS in 1991 and the ABC settlement agreement for Salvadorans and Guatemalans. We had a model for how to go about the legal screening, information sessions, and service delivery when DACA was announced.

- Legal service provider

DACA itself might be characterized as a legalization program, an immigration benefit, or simply an exercise of prosecutorial discretion that brings work authorization and other benefits. As such, it illustrates the often artificial line between "legalization" programs and programs for special populations that immigrant-serving agencies regularly accommodate. During DACA, for example, study participants worked with the naturalization-eligible Central American children, refugees, asylum seekers, survivors of crime, and TPS recipients. The CMS team also found several agencies in the midst of serving an unanticipated and largely unreported influx of Cuban immigrants to the United States. Since May 2016, thousands of Haitians have also reached the US-Mexico border and hundreds have crossed into the United States. They may be the next special population served by NGOs/CBOs in many communities.

The point is not to equate the level of work demanded by these programs, with what an immense legalization program would require. Instead, our study found that the capacity to undertake naturalization campaigns, register beneficiaries for TPS, and respond to any number of special

7 This analysis counts IRCA's Special Agricultural Worker (SAW) program as a population-specific legalization program.

populations has helped to build many of the skills, partnerships, and capabilities that would be necessary to implement a large legalization program. And, of course, these programs can provide either temporary or permanent protection from removal.

[T]he capacity to undertake naturalization campaigns, register beneficiaries for TPS, and respond to any number of special populations has helped to build many of the skills, partnerships and capabilities necessary to implement a large legalization program.

3. The capacity to provide competent legal assistance and representation to low-income immigrants has grown considerably, but not nearly enough.

The DACA era has seen an increase in the number of nonprofit immigration attorneys, BIA-recognized agencies and sub-offices, and BIA-accredited representatives. Respondents viewed BIA recognition and accreditation as an important metric of legalization readiness and capacity. Recognition and accreditation allows qualified non-attorneys from charitable agencies to practice immigration law before the US Department of Homeland Security (DHS) (first-level or partial accreditation) and in Immigration Court (second level or full accreditation). Expanding the number of recognized agencies and accredited individuals was not widely viewed as a priority for the broader immigrant rights community in the past, but that perception has been changing in recent years, particularly since DACA's inception. In some communities, NGOs and CBOs established concrete recognition and accreditation goals. National networks also prioritized the recognition of their local, affiliated agencies, and the accreditation of qualified staff.⁸

A CMS analysis of BIA rosters of recognized agencies and accredited representatives over the four-year period since DACA's inception (June 15, 2012 to August 29, 2016) reveals an *overall* increase of 389 BIA-recognized agencies and sub-offices, and 690 accredited representatives, including 621 partially accredited and 69 fully accredited representatives (see Figure 1).⁹ This represents substantial growth in legal capacity. Moreover, the number of agencies and sub-offices that became *newly recognized* (401) and individuals that become *newly accredited* during this same period (1,122) exceed the *overall* increases in recognition and accreditation.¹⁰ Appendix A provides a state-by-state breakdown of the numbers of agencies and sub-offices that secured BIA-recognition between June 15, 2012 and August 29, 2016, as well as the newly recognized agencies and accredited representatives from this period. The number of newly recognized agencies and offices since DACA's inception significantly exceeded the numbers of agencies that became recognized (226) in the four years preceding DACA (between June 15, 2008 and June 11, 2012). CMS does not have reliable data on non-attorneys who became accredited during this period.

The Immigration Advocates Network (IAN) maintains the nation's most exhaustive directory of

8 The number of BIA-recognized affiliates of the National Council of La Raza (NCLR), for example, grew from 27 to 41 between 2012 and 2016, with another eight or nine NCLR affiliates with pending "recognition" applications.

9 A number of accredited representatives work in more than one BIA-recognized agency or location. In addition, it is possible that some number of accredited representatives in these newly recognized agencies had formerly been accredited representatives at other BIA-recognized agencies.

10 Overall increases in recognition or accreditation understate the number of newly recognized agencies and accredited individuals because they include those that lost recognition and accreditation during this period.

nonprofit immigration legal service agencies, which includes attorneys on staff and BIA-accredited representatives. CMS's analysis of IAN's directory between December 2011 (pre-DACA) and July 2016 likewise revealed a dramatic increase in nonprofit immigration legal capacity.¹¹ During this period, IAN's directory shows an increase of 471 attorneys (from 1,684 to 2,155), 93 BIA-recognized agencies or sub-offices (from 562 to 655), 49 fully accredited representatives (from 277 to 321), and 255 partially accredited representatives (from 643 to 898).

Measuring Capacity

One possible metric of success in implementing DACA is the percentage of potentially eligible immigrants who applied for and obtained this benefit. Of course, estimates of program eligibility do not account for every eligibility criterion. Nonetheless, by this metric, DACA implementation has been a success, improving the life prospects of hundreds of thousands of persons. Of the estimated 1.26 million DACA-eligible persons, US Citizenship and Immigration Services (USCIS) had “accepted” 844,931 initial DACA applications through the first three quarters of FY 2016, and 606,264 DACA renewal applications (USCIS 2016). Study participants reported that, prior to the presidential election, initial DACA applications continued to be filed, particularly by persons aging into the program, but at relatively low levels that could be accommodated on a case-by-case basis. However, DACA renewal rates were robust (Hipsman, Gómez-Aguíñaga, and Capps 2016).

¹¹ Increases in the numbers of BIA-recognized agencies and accredited representatives in the IAN directory can only suggest growth in nonprofit immigration legal capacity. This metric does not account, for example, for agencies that simply withdrew from the IAN directory between 2012 and 2016, but that continued to provide legal services. In addition, IAN's directory may have gained agencies during this period that had been providing legal services prior to 2012. Finally, IAN may have become more thorough over the years in capturing a higher percentage of the legal staff of the groups in its directory.

Roughly 95 percent of adjudicated initial DACA applications have been approved, not counting pending cases or rejected applications, which are often incomplete or erroneously filed. At the same time, USCIS has issued requests for evidence (RFEs) in high percentages of cases, roughly 20 to 30 percent, according to some respondents. High rates of RFEs reflect DACA's demanding evidentiary requirements and the complexity of many cases.

Another possible metric is the number or percentage of applications filed by NGOs and CBOs or self-filed by applicants with assistance from nonprofit agencies. CMS lacked good data on these numbers. Moreover, this metric would need to account for the fact that distinct immigrant-serving agencies use different models, serve different populations, and handle cases of varying complexity. Self-filing models might, for example, generate higher numbers of applications than models in which agencies enter form G-28 notices of appearance as an attorney or accredited representative. All else being equal, group processing models that handle straightforward cases should generate higher numbers of applications than agencies that provide case-by-case representation and handle difficult cases. Similarly, agencies that serve hard-to-serve populations cannot be expected to generate as many applications as groups that target populations that legalize at high rates.

Differences in models and case complexity also need to be accounted for in funding determinations and in modeling coordinated community responses. The better metric for whole-of-community initiatives may be the overall numbers filed in the community, as opposed to applications generated by NGOs and CBOs.¹² One respondent favored the metric "100 percent" access to the program, whether through legal representation or access to resources and information that allowed for educated self-filing decisions. By this rigorous standard, DACA implementation would be considered less of a success.

While funders often view the number of applications filed by grantees as the central measure of their productivity, immigrant-serving networks and agencies argue for metrics that turn on capacity building and that encompass community partnerships, expertise through training and mentoring, a division of labor that builds on the strengths of each partner, the capacity of community partners to transition to other large-scale populations, and the ability to accommodate the full range of cases presented by potential program beneficiaries. Study participants argued that they had created capacity in the form of educated and committed volunteers, including DACA beneficiaries, and several stressed their ability to pivot quickly between priority services.

These different perspectives on metrics can reflect the phase of capacity building. An insistence on large filing numbers would not be appropriate in the early stages of a community's effort to build strong working relationships, divide labor, systematize coordinated services (like group processing), expand the capacity of immigrant-serving agencies, recruit volunteers, and hire and train sufficient qualified staff. However, at some point, applications filed would become a more fitting metric of capacity, among others. That said, applications filed by service providers should not be seen as a one-size-fits-all metric or even a fitting metric for many immigrant-serving agencies.

Beyond capacity and metrics, several principles and shared practices emerged from study interviews, which might be seen as minimal requirements for all application-assistance models.

¹² Of course, many participating agencies are not engaged in application assistance and, thus, are not in a position to report on applications filed.

First, there should be screening by a qualified attorney, accredited representative or paralegal acting under the supervision of an attorney at the outset of the application process to determine potential eligibility for all immigration benefits or relief. Second, potential applicants should receive a full explanation of the process, legal requirements, and benefits and risks of the different options available to them so that they can make informed choices. While many agencies, for example, hoped that the DAPA-eligible would apply for this benefit shortly after the program opened, many immigrants (not without cause) worried about the implications of applying in light of the presidential election. Third, effective programs enlist potential beneficiaries in securing documents, completing screening forms, and otherwise contributing to the success of their own cases. Fourth, partner agencies need to establish a clear and agreed upon division-of-labor which seeks to maximize their respective strengths. Fifth, each initiative should include a multi-faceted, culturally and linguistically appropriate plan for public education and outreach that covers program eligibility, community resources, public misconceptions, the concerns of targeted communities, and opportunities for program beneficiaries to engage in service-delivery and advocacy. Sixth, service delivery challenges should inform advocacy on program implementation, related benefits (like work authorization, advance parole, and driver's licenses) and legislative reform. Seventh, attorneys or experienced accredited representatives should conduct legal screening and final legal review of all applications prior to filing. Eighth, complex cases should be referred to attorneys or experienced BIA-accredited representatives for more intensive, one-on-one representation.

Similarly, respondents identified legal expertise — developed through training, work experience, and mentoring — as an essential form of capacity. As a corollary, they underscored the value of affordable, accessible legal training for attorneys, BIA-accredited representatives, and potential candidates for accreditation. To that end, study participants offered and attended training on DACA, immigration law, BIA recognition and accreditation, effective management of nonprofit immigration service offices, and “know-your-rights” presentations. Several participants expressed appreciation for the intensive Comprehensive Overview of Immigration Law: A Course for New Practitioners” (COIL) E-learning training offered by the Catholic Legal Immigration Network, Inc. (CLINIC). Others lauded the community navigator training developed by the National Partnership for New Americans (NPNA), which one respondent praised as “its own leadership development entry point.”

Training, technical support, and mentoring build and sustain expertise in a field in which the needs of low-income immigrants exceed nonprofit capacity and in which *notarios* far outnumber competent, low-cost immigration attorneys and BIA-accredited representatives. Participants argued for more training and mentoring, as a prerequisite to the growth of expert staff and qualified volunteers. They also viewed staff expertise and the ability to accommodate complex cases as an important form of capacity.

There were only 2-3 nonprofits in Fresno. Fast forward to present day, there has been a number of organizations that have gotten BIA recognized and accredited. They built the capacity because they realized that they have staff, capacity and power locally, [and want to] support the huge need.

- Resource and support center

Nonprofit legal immigration agencies and BIA-recognized organizations represent a kind of permanent capacity that can legalize low-income immigrants into perpetuity. The DACA era has seen substantial success in building sustainable capacity in this sense.¹³

4. The adoption of digital information technology has been uneven.

Given that DACA had a target population of young people and that it coincided with an explosion of access to digital information tools in the general population, it is no surprise that the program itself produced a profusion of new applications, platforms, and other digital tools designed to leverage legal expertise, expand the number of self-filers and facilitate screening and application submission online. We found that the use of information technology increased among immigrant-serving organizations seeking to automate tasks like public education, tracking members, and case management, but the pace of adoption was uneven and appeared to lag the broad trends in society as a whole. Uptake of technology among immigrants themselves, however, has been more promising, as have the results of new, self-help legal screening tools.

IAN, in partnership with other CIRI members, has played a leading role in using technology to support and expand DACA and other immigration services. Because of limited nonprofit and pro bono legal capacity and the high volume of self-filers, IAN has championed a “cultural shift” in the use of technology by immigrant-serving agencies and affected communities. We share this goal, consistent with protections against UPL and referral of immigrants with complicated or problematic cases to qualified attorneys or experienced BIA-accredited representatives. IAN has promoted new service-delivery models that allow DACA applicants to complete applications on computers in group settings, which then undergo legal review. IAN and other CIRI members have also made progress in partnering with community institutions like libraries and community colleges, which host platforms devoted to DACA implementation and can assist potential beneficiaries in using them.

Study participants praised IAN’s work and diverse technological tools from multiple sources, which they use for:

- immigration case management (Law Logix, Abacus, INSZoom);
- screening for DACA and non-DACA immigration benefits and relief (weownthedream.org, IMMI, Pocket DACA, Bridge.US, DACA Renewal Calculator);
- enrolling, tracking, and building community contacts and members (Salesforce, jAlcancel, and DREAM Connect);
- screening and application assistance for citizenship eligibility (Citizenshipworks);
- assisting immigrants and community agencies to identify nonprofit legal service providers and to obtain immigration news, updates, and basic information on the US immigration system (IAN, Immigo and adminrelief.org);
- providing know-your-rights information, community education, and screening on immigration benefits (immi.org);

¹³ It is a continuous struggle to sustain nonprofit immigration legal offices and to retain qualified staff.

- training staff and volunteers in cost-effective ways (web conferencing platforms); and
- remote legal case review (Skype and Google Hangouts).

Several participants identified the broader, more strategic use of technology in building service-delivery “infrastructure” as an attribute of the DACA program. Our study found that in 2016 a number of significant service organizations were not much better off than at DACA’s outset. Some were just beginning to adopt a modicum of information technology and had not fully integrated digital capabilities into their routine operations. A few were still fully anchored to the analog era.

Participants in the study raised a variety of concerns to explain what had held them back.¹⁴

Several experienced attorneys argued that new intake and screening tools would not add value to their work and, if imposed by funders, would lead to redundancies and inefficiencies. Many emphasized that technological tools needed to be adequately complemented with expanded low-cost or pro bono legal services. In other cases, study participants worried that *notarios* would abuse online tools designed to help immigrants manage their own applications for DACA or other programs. With predictable frequency, rural communities fell on the wrong side of the digital divide. Some expressed the broader concern that the digital divide inhibited the wide-scale use of new technology, both among service-providers and (to a lesser degree) among immigrants themselves. In addition, we found that the operational demands on service-providers leave them little time to research and test the many tools and services now available to them.

Respondents needed technological solutions to case management, member tracking, billing, and data collection for grant reporting. CMS found, as did IAN’s technology survey, that case management represents a central need for nonprofit immigrant-serving agencies (IAN and idealware 2016). According to the IAN study, most surveyed organizations tracked case data through spreadsheets, despite the availability of case management software for more than 20 years. CMS respondents that had adopted case management software stressed the significant improvements in their operations as a result.

5. Demographic information has become more widely available in the DACA era.

DACA was the first legalization program to benefit from detailed, publicly-accessible demographic data at the local level on potential beneficiaries. Study participants relied on this data for a variety of reasons, including to:

- identify communities in need of more BIA-recognized agencies or sub-offices, accredited representatives, and more service capacity of all kinds;
- guide resources to underserved communities;
- educate funders, local officials, and their own supervisors and boards on the importance of committing to DACA and legalization readiness in their communities; and
- target immigrant communities for outreach and education.

And, at the same time, the limitations of available data became more apparent. For example, estimates of the undocumented become less useful the smaller the geographic area or the

¹⁴ One study participant perceived a generational divide in the use of technology, with younger persons making greater use of mobile applications and established agencies more interested in on-site technology.

discrete group (national or other) for which information is sought. Also, the underlying data, most commonly originating with the US Census Bureau, typically does not capture disqualifying characteristics (like a criminal record). The most commonly available data must be used with particular care in calculating “implementation rates” (i.e., number of applications filed, divided by number of potentially eligible) as indicia of capacity or the success of implementation initiatives.

In any event, the use of demographic information by public and private entities to identify and meet the needs of immigrant communities has been institutionalized during the DACA era, and it now constitutes an important tool that would be available during a large-scale legalization program.

We have relied on the [demographic] data, for example, around both the unauthorized and naturalization eligible populations, in order to better target resources and outreach.

- Immigrants' rights organizations collaborative

6. Whole-of-community strategies gained ground during the DACA era.

Integrated, whole-of-community responses to large-scale immigrant service programs have historically been hampered by the distinct goals, missions, and operating styles of the diverse members of the immigrant rights community. While nonprofit immigrant legal services agencies indisputably provide an important service to individual immigrants, many have argued that they have limited social impact, weak community ties, and constitute an endless financial drain. They have also been accused of legitimizing an unacceptable status quo, by working within the system. Even in the context of DACA implementation, service agencies have been incorrectly characterized as mere “paper pushers.”

On the other hand, some attorneys have correctly pointed out that BIA-accredited representatives and attorneys who are new to the field need extensive training, work experience, and mentoring, particularly in handling complex cases. Accredited representatives also need training on legal ethics, legal research and writing, and courtroom skills and procedures. Others have expressed concern over an expanded role for community organizers in legalization implementation that may verge on the unauthorized practice of law. Tensions between diverse agencies may be particularly acute at the outset of a legalization program. Legal service providers will typically wish to err on the side of caution in submitting applications until they learn how these applications are being adjudicated and whether unsuccessful applicants are being referred for removal. For DACA, immigrant-serving agencies both wished to encourage participation in the program (to meet the early surge in demand) and to dissuade potential applicants from seeking representation from *notarios* and unscrupulous attorneys, which occurred due to delays in application submission. In short, there were good reasons for caution at the outset of the application period, but substantial pressure to expedite filings as well.

Despite understandable tensions between partners with different goals and operating styles, traditional concerns related to the work of different kinds of agencies have dissipated in the DACA era, as more partnerships and working relationships have formed among stakeholders. As

of March 2016, CIRI counted 14 regional coordination collaboratives whose members partnered “across organizations and sectors ...to enhance capacity and structure for effective implementation of administrative relief, immigration services and preparing for eventual immigration reform.” Appendix G includes a map and activity chart of regional coordination collaboratives, as well as a chart of regional funding collaboratives, taken from the Administrative Relief Resource Center’s website (<https://www.adminrelief.org/>). Ready California, for example, committed to using DACA and DAPA “to build a statewide infrastructure” and to create “structures that can respond to some large scale immigration benefit program that’s either DAPA or a legalization program.”

[N]o organization by itself would be able to meet the huge need. [If] we work by ourselves, the numbers we’re going to serve are going to be really minimal.

- Charitable social service agency

DACA has also seen a surge in community-wide responses to legalization preparation (Carson et al. 2014). One of the immigrant-serving community’s signature accomplishments during this period has been its emphasis on the need for a coordinated community response to legalization that builds on the strengths, relationships, and capacity of diverse civil society groups, and their public and private partners. In practice, this means that attorneys focus on legal screening and representation, community organizers on public education, outreach and referrals, government agencies and consulates on documentation, localities and schools on outreach and classes to satisfy educational requirements, and advocates on program implementation challenges. During DACA implementation, effective partnerships have formed not just between traditional immigrant service and rights agencies, but with non-traditional partners like health clinics, school systems, libraries, and social service organizations. In addition, multi-agency naturalization initiatives in many states and localities, including those coordinated through NAC, have built infrastructure and partnerships that can be mobilized and adapted in response to a large legalization program.

The DACA program also led to innovative partnerships between traditional nonprofit immigrant service agencies and youth-led advocacy and community organizing entities. Prior to DACA, for example, the American Immigration Lawyers Association (AILA), the National Immigration Project of the National Lawyers Guild, the National Immigration Law Center (NILC), DREAM Activist, United We Dream, the National Immigrant Youth Alliance, and Educators for Fair Consideration partnered on an initiative to match potential DREAM Act beneficiaries who were in deportation proceedings, with experienced attorneys.

After DACA, the Own the Dream Campaign and many of these same groups – as well as the National Association of Elected and Appointed Officials (NALEO) Educational Fund, CLINIC, the American Immigration Council, and the Immigration Advocates Network -- formed the National Legal Implementation Strategy Unit (NLIST). NLIST agencies produced an array of self-filing, screening, training, and public education tools. NLIST’s innovative use of technology, close partnerships between legal and organizing agencies, and rootedness in community need make it one of the most successful initiatives to emerge during the DACA era. One CIRI member reported that “pro bono attorneys stepped up to help with workshops, screening, individual cases, and cases in proceedings.” Unlike in the past, they did not see this work “as competition,” but as complementary to their legal practices.

Increased collaboration has provided a clearer picture of the actual capacity and potential of diverse agencies. For example, the Nebraska Immigration Legal Assistance Hotline (NILAH), a central intake and referral system, has made it apparent which agencies can accommodate which types of cases and in what numbers. This information might be seen as a prerequisite to effective capacity building and to targeted investments in legal services, organizing capacity, and technology.

[With the Collaborative], the providers are communicating more with each other to see what each other's capacity is and we're able to, outside of doing it for funding, expand on other types of projects.

- *Ethnic community organization*

Since IRCA, immigration service programs for special populations have relied upon volunteers, public and private partners, consular offices, and myriad public education and outreach strategies like *charlas*, the use of ethnic media, public service announcements, targeted advertising, and presentations at community gatherings and gathering places.

Most of the study participants indicated that they did not need to publicize DACA in the program's early weeks. In many communities, large crowds — often numbering in the hundreds — massed outside the offices of trusted community agencies following the announcement of the program, well before US Citizenship and Immigration Services (USCIS) began to accept DACA applications. NGOs and CBOs, in turn, channeled crowds into information sessions in which they conveyed the information available on the program, urged potential beneficiaries to begin collecting documentation on identity, presence, and immigration history, and warned against *notarios* and other unqualified or unscrupulous legal providers. The institutions in which undocumented immigrant youth met and worked also invariably became focal points for community education, services, and organizing.

As the application period opened in August 2012, many community agencies partnered on heavily subscribed group processing sessions, accommodated large numbers of potential applicants in their offices, or both. Trusted institutions — ranging from multi-service charitable organizations to youth-led organizing groups — served as a pillar of these initiatives, an antidote to *notarios*, and a continuous source of community education. The “social capital” built by these institutions proved an essential building block to DACA implementation and an element of legalization capacity that merits support and cultivation.

While the CMS team learned of new and valuable partnerships around DACA, it concurs with CIRI that “the immigrant rights community needs to devote more resources and attention to developing and replicating successful, horizontally integrated programs, which combine public education, community mobilization, and legal expertise” (Kamasaki, Timmons, and Tudi 2015, 290). This work requires substantial time and resources, but it is necessary. Immigrant-serving agencies, even those that productively engage groups outside their networks and sectors, often have relatively fixed partnerships and blind spots regarding the needs of immigrants in their communities. The CIRI networks have concededly not reached the “outward circle” or “next concentric circle” of entities to which immigrants turn for information and assistance. If correctly linked, trained, and channeled, these groups should be a source of additional capacity. However, they will first need to be identified and engaged locally.

One important lesson for us is to think creatively and broadly about who should be at the table and who we build partnerships with and start as early as you possibly can. Partnerships can be challenging to forge.

- *Government official*

7. The DACA era saw an increased emphasis on civic engagement by the populations most affected.

DACA was a byproduct of the first highly visible and sustained political initiative undertaken primarily by undocumented immigrants in the United States, the Dreamer movement. As such, it was natural for DACA implementation to produce a wave of civic engagement by the program's beneficiaries. Several organizations treated DACA as a vehicle for building capacity in the form of greater engagement by DACA applicants in service delivery, advocacy, and community organizing. As one participant put it, "We don't want to just process people ... We're really interested in how do we build a powerful people's movement and create change."

United We Dream (UWD), a national immigrant youth-led network of 55 affiliates and organizations, and other community organizing networks have sought to ensure that immigrants pursue DACA at high rates, and also contribute to DACA implementation and to the longer struggle for immigrant rights and social justice. In the words of one activist, these groups seek "to build a movement, not just to provide a service." UWD, the National Partnership for New Americans (NPNA), PICO, and others have worked to integrate immigrants into DACA outreach, public education, and provision of legal services.

In 2012, UWD and partners initiated the Own the Dream initiative, a national implementation campaign. Own the Dream attempts to educate potential DACA beneficiaries on how young undocumented immigrants successfully advocated for DACA and, thus, mobilizes them to "own" this victory by ensuring and building upon the program's success. It reports that its most effective outreach has come from veterans of the DACA process who directly engage their peers.

UWD's field office in Houston earned BIA recognition in 2015, which allows them to respond faster and more efficiently to constituent needs. Most UWD staff members are DACA recipients and many UWD members received assistance with their DACA applications and returned to the agency to help others. The peer-to-peer approach also leads to mentoring relationships which have inspired undocumented youth to continue their education and take new jobs. UWD also instructs community members on how to obtain their criminal and immigration records and, in the process, teaches them not to fear government agencies.

The most successful piece for us, when going out to talk to the community, has definitely been having people directly affected and people that have DACA being the ones that are giving out the information and telling people what the process is like.

- *Community organizing network*

NPNA also reports that immigrant participation has been central to ensuring effective program implementation. In order to serve immigrants at scale, the NPNA network seeks to "systematize

and professionalize the incorporation of community leaders and volunteers into the accepted and useful national system for immigration legal services.” Several study participants praised an innovative initiative spearheaded by NPNA to create a core of non-attorney community navigators that are trained to conduct public education on DACA eligibility and community concerns. Navigators also refer potential beneficiaries to community resources, particularly application assistance, legal representation, and educational programs. NPNA, UWD, and PICO have trained 700 community navigators on DACA eligibility, the ways in which non-attorneys can assist potential DACA beneficiaries, the unauthorized practice of law, and the basics of immigration law.

Navigators seek to surface community concerns regarding enforcement, application costs, and other potential barriers to applying. They also steer community members to trusted service providers and away from *notarios*, immigration consultants, and unqualified or unscrupulous attorneys. These services will be essential to the success of future legalization initiatives. In addition, navigators allow attorneys and BIA-accredited representatives to devote more of their time and resources to legal work. In short, they help to build capacity in the form of greater efficiencies and more effective division of labor. Finally, the role of navigators will differ in response to draconian enforcement policies, but it could be just as important in this context as it is in legalization planning and implementation.

Study participants explained that organizing networks and nonprofit legal service agencies continually struggle to retain members, leaders, and qualified staff. As a result, they must continually use (or lose) and renew capacity. To that end, one grassroots network seeks to keep members “working on a number of different issues” at any one time and “engaged around local and federal policies.”

Respondents also recounted advocacy successes, the growth in immigrant- and youth-led organizing networks, the interest of these entities in expanding the reach of their work by establishing BIA-recognized agencies, and an initiative to identify registered voters in the homes of DACA beneficiaries. Several respondents reported that advocacy successes, in turn, increased participation in DACA and enthusiasm for broader advocacy initiatives.¹⁵

The Undocumented Population: A Narrative Based on Facts

Study participants stressed the need for fact-based narratives and counter-narratives on the undocumented. The following points — drawn from a CMS presentation to community groups during one of its site visits — might inform public education and outreach efforts.

Contrary to pervasive mischaracterizations, the US undocumented population is deeply embedded in US society, with strong family, work, community and other equitable ties. Relatively few people cross the border without authorization, and as a result, massive government spending on border enforcement is a poor investment. The fact-based narrative of undocumented people in the United States indicates that the moment is ripe for a large-scale legalization program.

The narrative of an insecure, out-of-control US-Mexico border and an ever-growing undocumented population receives substantial play in the US immigration debate, spurred most recently by

¹⁵ Conversely, the study highlighted how environmental factors like raids or misinformation on DACA could diminish community participation.

President Trump's insistence on erecting some combination of a border wall and fencing along the entire US-Mexico border. According to this narrative, the undocumented population will grow dramatically once the economy fully recovers from the Great Recession. A legalization program, it is argued, will make this problem worse. Thus, the solution is more enforcement spending, more state and local self-deportation laws, more criminalization, and more of the status quo. In fact, between 2008 and 2014, the US undocumented population fell by one million persons, to 10.9 million, driven by a 510,000 decrease in the Mexican undocumented population between 2010 and 2013 (Warren and Kerwin 2015, 82-83, 89). The Great Recession did not cause this drop; the population had been trending in this direction since well before the recession (*ibid.*, 83-84).¹⁶

Regarding an unsecure US-Mexico border, the number of border apprehensions has fallen to less than one-fourth of the historical high (1.7 million) in 2000. Moreover, tens of thousands of border crossers over the last four years have been mischaracterized as undocumented immigrants when, in fact, they are refugees from Central America and Mexico who are legally entitled to seek protection.

The \$19 billion per year spent on the two US immigration enforcement agencies, Customs and Border Protection (CBP) and Immigration and Customs Enforcement (ICE), does not nearly capture US immigration enforcement spending. However, the amount still exceeds the *combined* budgets of the four main federal law enforcement agencies and the labor standards enforcement divisions of all federal and state agencies. US-Mexico border enforcement spending, in particular, has diminishing returns. Border Patrol agents in some sectors apprehend an average of fewer than five undocumented border crossers each year. Nor does the concentration of agents and technology on the US-Mexico border align with national security risks. Since before 9/11, there has not been a single documented case of a terrorist entering the United States by illegally crossing the US-Mexico border.

Finally, most new entrants into the US undocumented population are not border crossers, but visa over-stayers. In 2012, 58 percent of newly undocumented US residents overstayed or otherwise violated the terms of their admission (Warren and Kerwin 2015, 93), a figure likely to have increased in the interim. Border spending does nothing to address this phenomenon.

While often characterized as criminals and scofflaws, the US undocumented population, including potential DACA and DAPA beneficiaries, are deeply embedded and contributing members of US society. They are employed at high rates: 94 percent for the DAPA-eligible and 89 percent of the DACA-eligible (Kerwin, Warren 2016, 20, 23). They have strong family ties. Eighty-nine percent of the DAPA-eligible have a US citizen child, 7 percent have an LPR child, and 4 percent have both a US citizen and LPR child (*ibid.*, 19). Ninety-three percent of DACA recipients have at least a high school degree, and 46 percent are enrolled in school (*ibid.*, 24). They also have long tenure in the United States. Eighty-one percent of the DAPA-eligible have been US residents for 10 years or more and 27 percent for 20 years or more. Of the DACA-eligible, 85 percent have resided in the United States for 10 years or more, and 19 percent for 20 years or more. Of the DACA-plus, 72 percent have been in the United States for 10 year or more, and 65 percent for 20 years or more (*ibid.*, 19, 22). Except for their lack of status, DAPA beneficiaries resemble prototypical first-generation immigrants and the DACA-eligible prototypical children of immigrants.

16 Moreover, CMS has strongly rebutted the claim by the Center for Immigration Studies (CIS) that the number of undocumented immigrants increased in 2014 and 2015 (Warren 2016).

These factors — the deeply embedded US undocumented population, the relatively low numbers of undocumented crossers and the diminishing returns on enforcement spending — make it a good, if politically unlikely, time for a legalization program. Moreover, as report after report has documented, such a program would strengthen US families, communities, and the economy.

III. Lessons from Five Communities

The CMS team decided that it would not be able to identify five communities that would collectively capture the scope and diversity of US immigrant-serving agencies, much less the US immigrant population. However, it selected diverse communities for site visits, each with a distinct social landscape, history, and immigrant populations that shaped the community's network of immigrant-serving agencies. Each of these service delivery communities offers lessons that can inform future legalization readiness work.

Fresno

When President Obama announced the DACA program in the summer of 2012, California's Central Valley was still digging out from the Great Recession and just starting to contend with a devastating drought. Many of those eligible for DACA hailed from the long-suffering agricultural workforce.

Among immigrants who were not US citizens at the time, two-thirds of the foreign-born population in the Fresno metropolitan area, nearly 70 percent lacked a college education and more than 40 percent lived below the poverty level, according to census data. Across the Valley the population of undocumented migrants was estimated to exceed 300,000, with one of every five children living with an undocumented parent. Most of the adults worked in agriculture and poverty rates in their households exceeded 40 percent. Civil society in the community was similarly depleted and impoverished. Following the DACA announcement there was no group specifically focused on serving immigrants that had the resources for a DACA campaign. But that soon changed.

In September 2016, four years later, an umbrella coalition of community groups, public agencies, news organizations, elected officials, and philanthropies held its second annual immigrant integration conference and announced plans for a regional strategy that will feature an ongoing naturalization drive. The coalition is a direct descendent of improvised efforts to mount a DACA campaign. The contrast between the summer of 2012 and the summer of 2016 demonstrates how a registration process itself can be an occasion for building capacity that makes an enduring contribution to a community.

The launch of DACA immediately focused attention on the large number of immigrant young people in the Central Valley who failed to qualify for the program because they could not meet its educational requirements (current school enrollment, a high school diploma or its equivalent). The first response came from activists focused on adult education and especially a small community organization that specializes in tutoring, mentorship and other services for low-income students. The Education and Leadership Foundation (ELF) started holding DACA application clinics and soon found itself overwhelmed, setting off a scramble to develop capacity. By the end of 2012, DACA applications had already peaked in the large immigrant metropolises, but in Fresno DACA implementation was just getting started.

Key support came from two philanthropies that provided grants and technical assistance to several organizations undertaking DACA registration workshops. The Werner-Kohnstamm Family Fund, a small donor-advised giving fund focused on immigration issues, provided key seed money to boost the ELF's initial registration efforts and then made grants to several other organizations in the Central Valley to expand capacity. The Immigrant Legal Resource Center (ILRC), a national nonprofit legal support agency headquartered in San Francisco, worked with Werner-Kohnstamm and provided additional support for training and technical assistance.

"Once things got going, all kinds of different organizations got interested, even if legal services or even immigrant services, was not their thing," said Jesus Martinez, who was helping direct the ILRC initiative. In addition to a variety of advocacy, service and community-based groups, the DACA efforts attracted the Consulate of Mexico and local media organizations, including Radio Bilingue, long a focal point of activism in the Central Valley.

"Everybody pretty much agreed we'd benefit from coordination," said Martinez. Resources were concentrated in the few cities while the need was scattered around widely dispersed rural communities. In January 2013, ILRC helped organize the Central Valley DACA Project as a forum to share information, organize training, and marshal resources. Soon thereafter the US Senate began debating the Comprehensive Immigration Reform legislation, which it eventually passed that June, and interest mounted in preparing for the possible implementation of a broader legalization program.

By that summer, more than 30 organizations were involved to varying degrees with the project. Meetings held in a big conference room at the Mexican consulate in Fresno would routinely draw 15 or 20 people to conversations on topics like methods to speed intake or the coordination of outreach with local media and faith organizations. A virtuous cycle soon developed. Other philanthropies, like the Rosenberg Foundation, provided additional support even as Werner-Kohnstamm, then in the process of spending down funds, issued further grants. Government agencies, including the Fresno Unified School District and USCIS, as well as elected officials took note and offered assistance. CLINIC stepped up efforts to train volunteers for BIA accreditation. Procedures for volunteer training workshops and running registration events got routinized.

"About as soon as we started to get a handle on DACA, we realized that a full legalization would be much bigger and much more complicated and that we were in no way ready for it," said Martinez.

On October 25, 2013, the core group involved with DACA implementation and their allies gathered to begin development of a regional strategy for the implementation of comprehensive reform. Researchers at the University of Southern California were enlisted to develop a plan, and programs once aimed exclusively at developing capacity for DACA registration were broadened to include citizenship and a greater general awareness of immigrant rights. By February 2014 it had become apparent that no general legalization program would be coming from Washington, but the initiative born of DACA had already gained momentum and the Central Valley Immigrant Integration Collaborative was born.

The collaborative has continued to emphasize coordinated capacity building while branching out into issues beyond status such as access to education and health care. Sources of support have been expanded to a variety of national and California based philanthropies. A network of trained volunteers was in place to support registration drives when California driver's licenses

became available in January 2015 to those without legal immigration status, and now more than 30 BIA-accredited staff in community organizations across the valley are rendering assistance to immigrants. Having joined the New Americans Campaign, the collaborative is now increasingly focused on naturalization and the prevention of *notario* fraud.

The initial DACA project ran more 150 workshops across the valley, but the outcomes include much more than DACA application assistance. Four years later, the immigrant-serving community in California's Central Valley has not only greatly increased the scope and depth of its capacities, but also it has institutionalized consultation and coordination in a way that never existed before the initial DACA campaign.

Houston

The City of Houston covers an area of roughly 600 square miles and enjoys a large, diverse, and growing immigrant community. Of Houston's 1.5 million foreign born, 586,000 lack immigration status. Eighty-three percent of the undocumented are from Mexico and Central America and 63 percent have lived in the United States for 10 years or more. Twenty-eight percent earn an income that puts them below the poverty line and only 4 percent are unemployed. Most work in construction, restaurant and food service, wholesale and retail trade and other services.

Houston's immigrant-serving community operates in a challenging political environment. Public officials and NGOs report broad community support for would-be citizens and trafficking survivors, but strong opposition to the undocumented, to refugees (particularly Syrians), and to Muslim immigrants. As a result, traditional community pillars like the Greater Houston Partnership (the local chamber of commerce) and the United Way cannot be consistently relied upon to support pro-immigrant initiatives.

Houston benefits from established community agencies that provide extensive non-immigration services to immigrants, robust local foundations, and large private funders. Among its established nonprofit immigration programs, Catholic Charities handles a high volume of cases, including unaccompanied minors, asylum seekers, and complex deportation defense cases. At present, its immigration and refugee program employs 40 attorneys and 150 staff. As in other communities, Houston's immigrant-serving agencies have regularly accommodated "special," large-scale immigrant populations, including high numbers of Cuban parolees at present. In addition, these agencies have collaborated on a successful citizenship program through the New Americans Campaign.

After the announcement of DACA, potential beneficiaries turned out in large numbers to trusted and established agencies (roughly 500 persons lined up outside Catholic Charities). The Texas Access to Justice Foundation, a traditional immigrant legal service funder, supported the initial DACA work of nonprofit legal agencies. Immigrants also gravitated to wherever undocumented youth-led organizers met and worked. As stated, the community also hosts a UWD office. Before opening its own office, UWD operated in Neighborhood Centers, Inc., a well-established community-development network with five campuses and operations in 71 sites. Since DACA's inception, UWD has branched into service-provision as part of a larger strategy of immigrant engagement and empowerment.¹⁷

¹⁷ UWD has also created the DREAM Education Empowerment Program (DEEP) which focuses on helping undocumented youth to attend college, Deportation Defense Teams (DDT), and the Queer Undocumented Immigrant

Several lessons have emerged from the Houston community's work on DACA and DAPA. First, Houston has demonstrated the benefits of a unified, community-wide response to legalization planning and implementation. The clearest evidence of this response has been the work of the Houston Immigration Legal Services Collaborative (HILSC). HILSC had its roots in a meeting on legalization preparedness between Houston foundations, Grantmakers Concerned with Immigrants and Refugees (GCIR), and nonprofit agencies. The meeting represented the first time that many longstanding legal service providers had been invited to meet with funders to discuss their work, the immense needs of the immigrant community, and the challenges that would be posed by a large legalization program. The Houston Endowment, Inc. and Simmons Foundation subsequently supported a needs-focused planning process on how the community should respond to a legalization program.

The HILSC network developed a unified, community-focused, service-delivery plan which prioritizes:

- an honest assessment of expertise, capacity and community ties;
- new partnerships between immigrant-serving agencies;
- an intentional and creative approach to capacity building;
- partnerships between national funders like OSF and local funders; and
- expanded use of pro bono services.

HILSC has set concrete capacity building goals, which include:

- an increase in BIA-recognized agencies and offices and BIA-accredited representatives, particularly in under-served communities;
- attracting immigrant-serving agencies to Houston;
- funding for agencies that can expand their services to legalization beneficiaries;
- a division of labor that builds on the strengths of its members;
- coordinated communications and public education;¹⁸
- advocacy that prioritizes access by immigrants to public services;
- technical assistance, training, and mentoring to all participants in the service-delivery process;
- expansion of legal capacity to handle complex cases;
- provision of ancillary (to legal) services, including translation and support to persons with mental health needs; and
- a continuous learning cycle based on programmatic experience.

Project (QUIP) which supports members of the LGBTQ community who have “come out of two closets.” UWD's Own the Dream initiative offers community navigator training in Houston and around the country.

18 Political opposition to their work and communities has made it important for immigrant-serving agencies to present a united front.

These goals have largely been met. For example, nine agencies and offices became BIA-recognized and 23 non-attorneys accredited in Houston between June 15, 2012 and August 29, 2016. In addition, the Houston Endowment, Inc. provided funding to establish an immigration law clinic at the Houston College of Law to handle DACA and other immigration cases. And Justice for our Neighbors (JFON), a large nonprofit immigrant service and advocacy network, located an office in Houston.

Third, the Houston community — through HILSC — has established a continuous learning cycle that identifies best practices (from Houston and elsewhere). HILSC has found, for example, that effective collaboration benefits from: (1) momentum around targeted needs and issues (as has existed on DACA); (2) the participation of decision-makers from leading agencies; (3) professional facilitators with coalition- and capacity-building skills; (4) knowledge of best practices; and (5) support from myriad coalitions, think tanks, and service networks.

Among the community's successful service-delivery strategies has been outreach through local school districts to children who are aging into the DACA program. Partnerships with established institutions that work with immigrants (but do not provide immigration services), like chambers of commerce, churches, mosques, and social service agencies, have also been effective. HILSC has used pooled funding from the OSF and the Simmons Foundation to foster collaboration between community groups that had not previously partnered with each other.

Fourth, HILSC has been a forum for dialogue on new ideas for coordinated service delivery. While these discussions do not always lead to consensus, they are precisely the kinds of conversations that viable coalitions facilitate. For example, HILSC agencies have been weighing the merits of a central legal screening process and a standardized screening tool. Some members believe that such a system would better serve the immigrant community and create efficiencies for immigrant-serving agencies. Others argue that centralized intake — whether through a standalone agency or use of a common screening tool and a referral mechanism between agencies — would be time-consuming and would create redundant screening, record-keeping, and reporting requirements. HILSC members are also debating whether centralized screening models from other sectors (like homeless services or child aftercare programs) could be adapted by the immigrant services community.

Fifth, Houston offers a case study in the tensions that cities with mixed community and public support encounter in serving and advocating for immigrants. The city participates in the coalition of cities in support of DACA and DAPA. It also has a welcoming city initiative. City officials believe that they can serve as a clearinghouse for information, and a bridge between non-traditional partners like NGOs and corporations. The immigrant-serving community has partnered with the Houston city government on a website called Citizenship Corner, which includes information on DACA eligibility and services. In addition, they appreciated the mayor's endorsement of the DACA and DAPA programs after the Supreme Court decision in *United States v. Texas*, as well as the city's language access ordinance. However, they did not view local and state government as a full partner in DACA implementation.

City officials, in turn, expressed frustration at the lack of consultation from the federal government on decisions that heavily impact local communities, like large-scale deportations, the Cuban influx (caused in part by reestablishing diplomatic relations with Cuba and fear related to the continued viability of the Cuban Adjustment Act), and the establishment of the DACA and DAPA programs.

One official persuasively argued in favor of an institute to train and prepare state and local leaders to implement immigration programs, including a potential legalization program. This idea is well worth considering since many political appointees do not have expertise in either immigration issues or community mobilization.

Miami

The ecology of immigrant-serving organizations in South Florida has evolved in response to the region's unique history as a port of entry and place of settlement. Though extraordinary in origins and trajectories, the Miami-Dade experience offers broadly applicable lessons, particularly in regard to the value of including legal services as a component of legalization processes.

In a metropolitan area that stretches from the Florida Keys to Palm Beach, some 40 percent of the population is foreign born — 2.4 million people — and 87 percent of the total speaks a language other than English at home, making Miami the nation's most cosmopolitan metropolis. While Cubans are by far the largest national origin group, comprising nearly a third of the foreign born, the Miami metro also has sizable populations of Haitians (200,000), Columbians (165,000), Jamaicans (135,000), Nicaraguans (90,000), and many other nationalities.

Although the vast majority of the foreign born in Miami arrived to the United States via channels that offer ready access to legal status, more than a million are not US citizens. CMS estimates indicate that the foreign-born include some 365,000 undocumented immigrants. Miami's undocumented population is highly diverse. With more than 50,000 people out of status, Haitians make up the largest nationality, but there are also populations of more than 20,000 undocumented from seven other nations. Of the 46,800 DACA-eligible in the greater Miami area (52 percent of Florida's total), 83 percent have lived in United States 10 years or more; 94 percent speak English well, very well, or only English; 57 percent have some college or a degree (ages 18 and over); 84 percent of those in the labor force are employed (ages 16 and over); and 78 percent are at or above the poverty level.

This combination of factors has produced a large and varied immigrant-serving sector with a remarkable history. That history illuminates one form of capacity building of particular significance to this paper. Time and again, Miami has managed large-scale immigrant-service initiatives for discrete populations eligible for status or an improved status. Several programs have involved the filing of asylum claims. Others such as DACA or TPS after the Haitian earthquake have required extensive outreach to eligible populations and the capacity to handle large numbers of applicants. And the same networks of organizations and advocates have periodically conducted community-wide naturalization campaigns when funding has been available.

This history has generated a capacity to work both in the courtroom and on large programs involving administrative relief, to focus on individual cases and to handle crowds, to conduct publicity campaigns and to hatch appellate litigation strategies. And in a best practice with broad application, the Miami experience has shown that this is all of a piece.

DACA implementation launched not long after the immigrant-serving sector had undertaken enrollment for TPS for Haitians after the 2010 earthquake and as naturalization campaigns were underway. Senior staff at several different types of organizations involved in the DACA effort portrayed it as more of a repurposing of existing assets than the creation of an all new mechanism.

Personnel had to be trained on the specific requirements of DACA, of course, and a different set of community-based organizations had to be engaged for outreach to a different target population. But the core of the effort involved activating pre-existing networks of collaborators, such as volunteers experienced with running events, BIA-accredited volunteers, pro-bono attorneys and other allies, and applying familiar methodologies. So, for example, rather than undertaking events where large numbers of people get relatively little individual assistance, the Miami strategy involved more modest-sized DACA events with at least some screening and legal services on-site. Although DACA implementation proved less complicated and litigious than some other programs, the Miami strategy is not to take anything for granted.

“We’ve learned from long experience that you have to think in terms of a continuum of activities,” said Cheryl Little, executive director of Americans for Immigrant Justice, a Miami-based service and advocacy organization. In order to secure benefits for eligible immigrants, outreach and registration need to be matched with legal counsel, litigation, and policy advocacy. “It is never as simple as just getting people to sign up,” Little said, “you have to be prepared to fight over the rules and over what happens next.”

Little traces her involvement in immigrant services to the long difficult battles over the status of Haitian migrants in Miami, battles not just over immigration status but social and economic status as well. A veteran of the Haitian Refugee Center and an attorney by training, Little sees registration processes as occasions that require legal muscle power and policy-making capabilities. It is a view shared by others with a similar professional history.

“You need to be involved from the start in the development of the regs [regulations] and then you have to monitor their implementation meticulously and all along you have to be advocating and litigating for the most favorable application of those regs,” said Randolph McGrorty, chief executive officer of Catholic Legal Services for the Archdiocese of Miami.

Under this strategy the scope of the eligible population is not determined by the relevant statutory, regulatory or administrative language, but rather by the efforts of service providers and advocates who struggle to broaden the scope. “Sometimes the greatest impact comes after implementation is well underway,” McGrorty said. Several different tactics can be applied to this process. Best practices by public agencies can be identified and promoted. Inconsistent practices can be identified and corrected. Unfair practices and unintended consequences can be identified and litigated. And throughout, legal standards can be clarified to expand eligibility.

In order to maximize the population with access to a benefit, advocates argue that trained and experienced legal providers need to be involved in the planning and implementation of immigrant service campaigns during all phases. For example, monitoring how documentation requirements are being applied by a public agency requires establishing legal representation for a sample of applicants at the onset. Also, unusual cases that present either challenges or opportunities will go undetected unless the appropriate personnel see them developing. According to this model, litigation and advocacy are most effective when they grow out of service and registration activities.

This strategy had its greatest success on a national scale with the implementation of the Immigration Reform and Control Act of 1986 (IRCA). Over the course of several years that extended well beyond the original registration period, the number of immigrants who benefited from IRCA’s legalization programs increased due to class action lawsuits, advocacy with district

directors of the Immigration and Naturalization Service (INS) and major rule changes emanating from Washington, DC. In Miami, this strategy has been applied repeatedly enough to become standard operating procedure for the sector, or at least it is the preferred procedure when resources are available.

Over time this strategy has shaped the very structure of the immigrant-serving sector in Miami. For example, ongoing collaborations have developed between community-based organizations and immigration clinics at three law schools in the metropolitan region. And, securing BIA accreditation for personnel has become a priority for groups that are otherwise focused on community organizing and advocacy. And the strategy has also shaped the way organizations staff registration campaigns.

“We always prefer to have an attorney in the room, even for a naturalization event, and law students are great for helping with registrations,” said Rita Mendez, director of services for the Florida Immigrant Coalition. This has a benefit beyond the monitoring function described above. “You always get some people who are going to benefit from a closer look at their case than you can expect from the average volunteer.”

Given the complex diversity of the immigrant population in Miami, service providers report routinely encountering people who are eligible for benefits they did not even know existed, and conversely there are people who may be unaware that they are vulnerable to removal or other penalties. Helping such clients improve their immigration status is often just a matter of evaluating their equities and steering them in the right direction, allowing for significant gains without the need for extended legal representation. That kind of screening is most efficiently provided at medium- or small-sized events where a triage process can take place. The easier cases can go to volunteers for straightforward application assistance. Others might require BIA-accredited personnel. And, an attorney handles those who present complications, and oversees submission of applications.

“For the red flag cases, you really want to establish a trust relationship that very day so that they come away with something,” said McGrorty. “That won’t happen when you are only set up to handle the people who have all their documents in order and who clearly meet the requirements.”

Maintaining a supply of qualified personnel for these kinds of events presents significant capacity building challenges especially when immigrant service campaigns are sporadic. But, some of the most severe limitations arise from the ways that work with discrete populations is funded and evaluated.

“If you have to meet numeric goals, then you have to go for the low-hanging fruit,” said McGrorty. “If you are going for low-hanging fruit, then you are directing services to the population with the lowest needs and you are turning away the others.”

Nebraska

The State of Nebraska’s undocumented population is relatively small, 42,400 persons in a state with a foreign-born population of 120,000. The undocumented are concentrated in Omaha, particularly south Omaha, although they can also be found in Lincoln and in more rural areas. Community organizers from Nebraska Appleseed stressed the isolation of immigrants in rural

communities, which puts them beyond the reach of traditional outreach strategies and, in some cases, prevents their use of technologies requiring broadband services.

The undocumented represent only 2 percent of the state's population, with Mexicans (24,000) and Guatemalans (10,000) the leading populations. Fifty-five percent have lived in the United States for 10 years or more, 36 percent earn an income below the poverty line, and 10 percent are unemployed, including 17 percent in Omaha. This population works mostly in construction, manufacturing, services like building maintenance, restaurants and other food service, and travelers' accommodations. In rural areas, many immigrants work in meat packing plants and feed lots. Most immigrants in the meat packing industry enjoy legal status.

The Nebraska immigrant-serving community benefits from the support of several large, community-focused foundations. It does not receive similar support from state, county, and local officials which, as service providers put it, "oppose us on everything related to DACA" and "don't want to work with us because they're not on our side." However, at the same time, community organizers have identified allies in public and private institutions and across the political spectrum to address immigrant needs which many view more as local and state challenges than grist for partisan politics. This broader sense of community has been reflected in state legislation that benefits DACA recipients, philanthropic support for the education of DACA recipients, and an overall desire to keep young Nebraskans in the state.

[When] I graduated high school in 2013, I had my Social Security number and work permit. I went to my guidance counselor to ask for help to get into a college. Teachers were also learning about DACA and how it works with universities. They did a good job of talking to each other and collaborating with universities across the state and the philanthropic community in Omaha, Nebraska. It was really a sense of community where everybody was helping each other.

- *DACA recipient*

The pillars of the immigrant-serving community's response to DACA have been: (1) public education; (2) DACA service provision; (3) advocacy on DACA implementation; and (4) leadership development with the goal of building collective power.

The CMS team found a sophisticated and coordinated immigrant service collaboration that had developed without national funding and, with a few exceptions, without major support from national networks.¹⁹ Justice for our Neighbors, which was established in response to the 1996 immigration enforcement legislation, represents a key participant in this collaboration. In five years, JFON has grown from four to 18-full time employees, including 11 attorneys that represent survivors of violence, asylum seekers, and unaccompanied children. It also handles non-immigration legal work which affects immigration benefits, like guardianships and custody cases. Remarkably, it provides only free services, virtually all to persons below 150 percent of the poverty line. This unique model is possible due to: (1) a division-of-labor with other groups in the community, which handle more standard immigration applications and petitions; (2) substantial

¹⁹ Several agencies, however, reported that they had benefitted from legal and community navigator training and from technological support.

support from local foundations; and (3) effective partnerships with established community institutions.

The collaboration features a centralized case intake and referral mechanism called the Nebraska Immigration Legal Aid Hotline (NILAH), which is housed at Legal Aid and used by all the major immigrant-serving agencies. NILAH relieves immigrants of the need to visit multiple service providers in search of the one provider that might accept their case. In theory, it should also obviate the need for multiple screenings, although some groups indicated that they still need to screen NILAH-referred immigrants. NILAH's case-management and record-keeping system allows the groups to provide periodic updates and communications to the DAPA-eligible and to others in the community. NILAH has also helped to clarify which groups handle which types of cases and in what numbers.

NILAH referrals represent roughly 50 percent of the cases that are handled by participating agencies. Other cases come through partnerships with community organizations that serve significant immigrant populations, but do not provide legal immigration services. Some legal programs, like Catholic Charities, regularly see DAPA-eligible clients that participate in their parent agencies' other programs, like family enrichment and micro-business programs.

Since DACA's inception, the Nebraska immigrant-serving community has expanded capacity through the addition of BIA-recognized agencies and offices, and BIA-accredited representatives. Catholic Charities, for example, established a BIA-recognized office in Schulyer, received partial accreditation for two staff, and full accreditation for two more. The community has also built capacity through a division of labor, which has created efficiencies and allowed groups to focus on the work they do best.

The CMS team also met with the leaders of an active, youth-led organizing entity, which works out of the Omaha-based Heartland Worker's Center.²⁰ The Young Nebraskans in Action program, which arose out of the DACA program, draws heavily on local universities and high schools for membership and support. It has prioritized access to DACA and has partnered with JFON and other groups to pass state legislation making DACA recipients eligible for driver's licenses and to provide them with access to professional and commercial licenses. While immigration enforcement activities in rural Nebraska and neighboring Kansas initially dampened enthusiasm for the DACA program, the two state legislative victories reportedly prompted many to apply.

The Young Nebraskans in Action's overall goal is to build political power by increasing immigrant voters and candidates. This work entails "being part of the chamber of commerce, the school boards, the hospital boards . . . organizing people to vote." The group has not made it a direct priority to influence institutions like unions, schools, churches, and corporations. Rather, it seeks to empower the populations who will themselves influence these entities. "We're always trying to identify leaders," said one youth leader "and it's because what we're trying to do is change the culture of participation and not just at the workplace, but with everyday life." Its motto and ethic is not to do "for others what they can do for themselves." Young people "see the potential [for change] and see ourselves being part of a change."

The CMS team was also impressed with the intensive and long-term efforts by Nebraska Appleseed to organize and educate immigrants in the western part of the state, some of whom had not heard

20 The Heartland Worker's Center had its roots in organizing immigrant meat packing workers in the 1990s.

about the program. Outreach and public education to these rural communities occurred through state educational service units, which serve as back-up centers for schools, and public health programs. Community navigator training represented a centerpiece of leadership development and DACA implementation in these communities.

Prioritizing Participation by Underserved Communities

Among the unexpected challenges to arise from DACA implementation was the seemingly lower rate of applications from Asian American and Pacific Islander (AAPI) communities compared to Mexicans and other Spanish-speaking populations. Although “implementation” rates can be difficult to assess, particularly with smaller populations, study participants reported on their own experiences with lower than expected filings by certain communities.

Agencies that primarily serve AAPI communities reported that, despite targeted outreach, they continue to serve more Hispanic DACA applicants than Asians. A staff person at one agency recounted: “I had a South Korean DACA last month, and I was like ‘Unicorn!’” Another remarked: “I had an Indonesian guy come in the other week . . . an undocumented Indonesian guy, I couldn’t believe it.”

A 2014 analysis of AAPI participation in DACA attributed this phenomenon to:

- the modest number of national and local organizations (roughly 30) with programs to assist AAPIs who might qualify for DACA;
- the isolation of AAPI communities and their lack of connection (often) to support networks for potential DACA beneficiaries;
- the barriers to applying faced by all potentially eligible youth, including cost, documentation, failure to meet program educational requirements, insufficient support and information on how to apply for the program, and “fear of deportation or negative consequences to other family members”; and
- a sense of shame related to undocumented status in communities that do not discuss or acknowledge this challenge (Lee 2014).

Study participants offered multiple explanations, often couched as conjecture, on low AAPI participation in the DACA program. Some of these explanations reflected the diversity of the AAPI community. Many South Asian youth, one participant said, felt threatened and besieged by US authorities. As a result, they would not come forward to large-scale group processing sessions. Instead, NGOs and CBOs need to “find” the DACA-eligible in these communities through their schools, places of worship, and community events. Others argued that service-providers lacked the cultural competency, language skills, and community ties to AAPI populations. Groups that serve predominantly Asian-American populations affirmed that ethnic media had not extensively covered or been particularly interested in DACA. One group found that allowing members of AAPI communities to call a hotline anonymously for information and counsel reduced the public stigma and shame associated with admitting to lack of status.

Some speculated that certain Asian communities (particularly Koreans) turned to attorneys from their own communities. Others reported that there was a belief in some communities that free

or low-cost services were less valuable than those provided by private attorneys. One attorney said that because Asians mostly entered the United States legally, many believed that they could eventually adjust to lawful permanent residence and forego the DACA program entirely. Another explained that some Asian youth (like many Chinese nationals) came to the United States in time for high school, and thus did not meet DACA entry requirements. In addition, a few participants believed that demographic reports had simply overstated the number of potentially eligible persons from AAPI communities.

From these various explanations, it became clear that more research is needed on why discrete AAPI populations do not come forward at high rates and, conversely, on what they might value about a legalization program that would convince them to apply. The findings also point to the need to engage the press serving AAPIs on the relevance and value of a legalization program to their communities. Finally, the immigrant-serving communities need a better, more nuanced outreach and public education strategy for AAPI communities.

Queens, New York

By the numbers, Queens enjoys the highest percentage of foreign-born residents and the most diverse immigrant population in New York City. Of its foreign-born population of 1.1 million, 224,000 lack immigration status. Mexicans constitute the largest share of undocumented persons, followed by Chinese, Ecuadorians, and Koreans. Eighty-one percent earn at or above the poverty level, and only 4 percent are unemployed. The undocumented work in restaurants and other food services; as private household workers, personal care providers, and construction workers; and in health care and social assistance, retail trade, and other industries. Despite the size and diversity of Queens' immigrant community, its immigrant-serving agencies have attracted little attention from researchers or national agencies. Part of the reason may be that immigration service provision crosses boroughs in New York City. According to New York City service providers, immigrants come to them from throughout the city. CMS interviews and site visits elicited three important themes from Queens.

First, Queens illustrates the importance of local government leadership in legalization planning and readiness. The New York City Mayors' Office for Immigrant Affairs (MOIA) played a galvanizing role in organizing DACA services in Queens. MOIA's initial foray into DACA consisted of public education through transit ads and use of ethnic media, marketing on DACA's benefits (which included eligibility for public health insurance), and promotion of DACA through its 311 number. MOIA also took responsibility for educating other city agencies on the program, a particularly important function given the role of city agencies in allowing applicants to meet DACA's evidentiary requirements and to receive public benefits.

In February 2016, the ActionNYC initiative, a centerpiece of the city's DACA and DAPA work, went into effect. This program seeks to connect New Yorkers to free and safe immigration legal screening and services through a network of vetted CBOs and legal service providers. The program uses technology that tracks persons from first contact to case closure, allows for referrals, and includes a tickler system for appointments. A tool called Bridge.US permits uniform case screening by city-funded navigators working in nonprofit agencies. Navigators assist in DACA document preparation and other services. They also work toward BIA-accreditation, with the goal of increasing service-delivery capacity. In August 2016, MOIA launched the DACA Education

Initiative for potential beneficiaries that lack qualifying educational credentials.²¹ New York City has also assumed a leadership role in Cities for Action, a coalition of cities that seeks to help local residents apply for DACA, share best practices between communities, and defend DACA and DAPA as legitimate expressions of Executive authority. MOIA has also partnered with the New York Immigration Coalition to produce a guide on the documents needed for DACA applications. In addition, it provided extensive outreach on DACA and DAPA by experienced organizers that had earlier promoted New York's municipal ID and that could be activated for future legalization programs.

MOIA also committed substantially to comprehensive immigration screening for New York City residents by funding lawyers and navigators to work in community agencies. Immigrant-serving groups, in turn, have begun to identify unscrupulous and incompetent private attorneys, as well as *notarios*. Some work with the New York attorney general's office, MOIA, USCIS, and the Protecting Immigrant New Yorkers Task Force (PINY), with the goal of referring illegal and predatory service providers for prosecution and securing status for their victims.

Beyond an active municipal response to DACA and DAPA, Queens offers a range of replicable and sophisticated service models, which can benefit future legalization programs. These include:

- legal service programs located in community centers whose focus is community organizing;
- a unique immigrant service network embedded in the City University of New York (CUNY) system and that also operates in 32 New York City council member's offices;
- immigrant service agencies that take a holistic, immigrant-focused approach to services that encompasses worker's rights, housing and other needs; and
- a wide range of agencies focused on the rights of particular national and ethnic groups.

As in other communities, agencies composed of potential DACA beneficiaries have played a leading role in public education, outreach, and service to potential DACA recipients. Of particular note, Make the Road has 19,000 dues paying members and a robust Youth Power committee. It has educated a high volume of potential DACA beneficiaries on program eligibility, community services, and its advocacy priorities, with the goal of increasing participation in this work.

New York City also creatively funds legal services, including for citizenship, deportation defense, DACA, and unaccompanied minors. Its service-delivery and funding models should be adopted by communities throughout the nation.

IV. Recommendations

After four years of implementing DACA, what have immigrant-serving communities learned about how to prepare for future challenges? This analysis identifies many ways in which organizations already perform the basic functions of a future legalization program through screening, programs for special populations, capacity building, enlisting program beneficiaries in implementation

²¹ DACA requires graduation from high school or enrollment in a qualifying educational program. The Education Initiative funds nine community agencies that offer qualifying educational programs for the purposes of DACA eligibility.

activities, and inter-sectoral collaborations. The following section explores recommendations as to how the immigrant-serving community should build upon the groundwork laid and leveraged by DACA implementation. Our recommendations follow three overarching themes:

- Widespread screening and service provisions to special populations should continue to facilitate legalization.
- Immigrant-serving organizations need to bring to scale all the forms of capacity established and expanded during DACA and programs for other special populations, with particular attention to legal expertise, division of labor, public education, immigrant engagement, the strategic use of technology and data, and models that accommodate potential beneficiaries facing a range of challenges.
- The community should inform and educate immigrants, organizations, lawmakers, researchers, and the general public on the benefits and ingredients of a successful legalization program.

Continue to pursue widespread screening of the undocumented and initiatives targeted toward special populations, as legalization readiness activities, as legalization programs in their own right, and as a way to protect the undocumented and immigrant communities from draconian enforcement policies.

Screening. If Congress were to pass legislation that would potentially legalize two million undocumented persons, with additional beneficiaries joining this group each day, the immigrant-serving community would mobilize to educate, assist, and represent them. In fact, the potential for such widespread benefits currently exists, despite the absence of legislation or executive action. It derives from the number of undocumented persons who have the potential to acquire some measure of legal status due to their individual histories. Taking advantage of these circumstances requires broad screening of the undocumented and the capacity to secure legal assistance for those found to be potentially eligible for an immigration benefit or relief. As several study participants stressed, screening without sufficient legal capacity could be counterproductive and an exercise in futility.

Moreover, screening will contribute to the success of a future legalization program by putting many on a path to legal status, connecting undocumented immigrants to competent immigrant-serving agencies, and thus protecting them from unscrupulous legal practitioners.

This analysis argues for a substantial, continuous investment in screening the undocumented for immigration benefits and relief. The goal should be to put as many undocumented persons as possible, as soon as possible, on a path to permanent status and citizenship. This imperative reflects what some study participants refer to as a “no regrets” approach to legalization readiness; that is, it satisfies an important social goal (legalization of those potentially eligible for an immigration benefit or relief), whether or not Congress passes reform legislation in the foreseeable future. It creates possibilities for legal status for the undocumented family members of LPRs and naturalized citizens. It will also ultimately put many beyond the reach of the US immigration enforcement system.

Targeting special populations. Legal services organizations have, as explored here, been implementing special programs for specific immigrant groups for many years. Legislation that extends status to discrete populations (Kerwin 2010), or programs created (like DACA) or

extended to new populations (like TPS) via administrative action might be viewed as entirely distinct from a large legalization program. However, they are better understood as critical building blocks for a large legalization program, as legalization programs of a sort themselves, and as a way to protect individual immigrants and communities from the ravages of massive enforcement. The NAC naturalization program, for example, has pulled together a robust network of agencies and partnerships that are well placed and equipped to contribute to legalization efforts. These resources could be mobilized in support of a large legalization program, without losing NAC's commitment to naturalization. Moreover, naturalization services will ultimately be needed for legalization beneficiaries.

Legislation that extends status to discrete populations or programs created via administrative action should be understood as critical building blocks for a large legalization program, as legalization programs of a sort themselves, and as a way to protect individual immigrants and communities from massive enforcement.

Decades of service to special populations have laid valuable groundwork for a large legalization program, and this work must increase. The recommendation to repurpose existing infrastructure should not suggest that preparation for a legalization program should preclude work on more targeted, population-specific programs. Rather, it makes the case that support for smaller-scale special programs will help to build and sustain the capacity, enthusiasm, and partnerships that will be crucial to the success of a large legalization program. As such, the immigrant-serving community should invest in multi-agency, service-delivery initiatives for special populations of immigrants, as a crucial strategy for ensuring legalization readiness.

Bring to scale all forms of capacity built and expanded during DACA.

Implementation of DACA, and preparation for DACA-plus and DAPA, helped organizations build capacity in multiple areas: legal, whole-of-community, civic engagement, investment in trusted institutions, technology, and knowledge of community demographics. This study identified several areas in which immigrant-serving organizations have substantially more capacity-building work to do in order to bring their efforts to scale.

Legal capacity. Immigrant-serving organizations need to employ competent immigration attorneys and BIA-accredited representatives in order to ensure that each community member receives the status for which they are eligible. In many cases, however, initial training does not adequately prepare representatives to provide competent representation. In addition, newly accredited representatives and inexperienced attorneys require hands-on experience before they can be assured of providing competent representation on their own. "This is a learning process," one participant commented, "so there has to be monitoring of many steps and then also constant training of that step so that they're able to really grow in their capacity of experience." Respondents persuasively argued for more training and mentoring as a prerequisite to the growth of expert legal staff and non-legal staff and volunteers that play important roles in large, integrated, service-delivery initiatives.

Organizations also struggle to maintain capacity between major initiatives, because they have difficulty maintaining human and financial resources during these gaps. To some extent, this phenomenon reflects fluctuations and gaps in funding that are beyond each organization's control,

as occurred during DAPA and DACA-plus planning and that regularly occurs in on-again, off-again naturalization campaigns and initiatives for other discrete populations. One study participant lamented that chronically limited funding leads nonprofit agencies to lose experienced attorneys because they cannot offer competitive salaries. In order to maintain human resource capacities, one organization that opened an office in anticipation of DACA-plus and DAPA retrained its newly hired staff to process TPS re-registrations, DACA renewals, and U-visas. As a result, this organization has been able to keep nearly all of its DACA and DAPA new hires. Immigrant-serving organizations should work to use and renew capacity between major events as a means of retaining members, leaders, and qualified staff. In addition, funders should attempt to provide more steady, consistent and flexible funding for readiness work of this kind.

The philanthropic community and individual foundations should also make it a priority to communicate how they establish priorities, balance competing demands, make funding decisions, and relate to each other, particularly national and local funders. Community groups depend very heavily upon and often must meet extensive programmatic and organizational requirements to secure support. However, many groups do not operate with sufficient information or knowledge about funders that allow them to plan effectively or even to support their funding partners.

Trusted institutions. Many trusted immigrant-serving organizations successfully engaged groups outside their traditional networks and sectors to implement DACA. Study participants noted, however, that the institutions most trusted to provide immigration-specific services often lacked partnerships with the “outward circle” of entities to which immigrants turn for advice and assistance, including faith communities, community centers, and the workplace.

We found it was most effective when we worked with established community partners and people who had already established trust in their communities.

- *Legal service provider*

This reflects the challenges of building enough staff capacity to identify, engage, and work with diverse groups. Compounding these challenges, entities in the outward circle that have limited knowledge of legalization options often need significant training in order to educate their communities. Such organizations will nonetheless be important sources of additional capacity for implementing a large-scale legalization program. The immigrant-serving community should map, engage, train, and properly channel this outer circle of trusted community entities.

Technology. Study participants noted that communities with the fewest resources and most limited infrastructure often do not use available technology; some related this to their concerns about how *notarios* and other unqualified legal providers co-opt online tools. As explored earlier, however, technological tools can be capacity-building engines that provide important organizational infrastructure, and that direct users to qualified attorneys and experienced BIA-accredited representatives who can help with their cases. Immigrant-serving organizations should expedite the development and use of technology that can expand their service-delivery capacity and public education, including safeguards against UPL. In rural communities and other communities that underutilize technological tools, the strategic introduction of expanded technology should be accompanied by intensive training and mentoring.

[Technology] was crucial in rural areas where they wouldn't have otherwise been able to get support and an accurate, complete consultation with an immigration attorney.

- *Community organizing network*

Role of Local Government

This study has underscored the importance of leadership in DACA implementation, special initiatives for discrete populations, and legalization programs. In the five communities described in depth in this report, DACA leadership came from established and new immigrant-serving organizations; local and national funders; coalitions, support agencies, and collaborative processes; and government agencies.

Public institutions, particularly local and state government, can:

- provide necessary documentation to potential applications
- fund legal screening, representation and public education
- offer classes that allow immigrants to meet program eligibility requirements
- advocate for generous legal interpretations and evidentiary standards, and
- foster non-traditional partnerships, as between private corporations and nonprofit service providers
- provide space and volunteers

Conversely, government agencies can refuse to assist in program implementation and can create an atmosphere which discourages applicants from coming forward.

Cities for Action, a national coalition of mayors and other municipal leaders, has advocated for a broad legalization program and other pro-immigrant policies. It has also identified and disseminated best practices in this area. Consistent with this work, it should partner with state, county and city trade associations and with the NGO/CBO community to create an institute devoted to training state and local officials on implementation of immigrant service, protection, and legalization programs in their communities. This need is particularly acute given the regular turnover in administrations, the relative inexperience of many officials on immigration issues, the hostility in many communities towards immigrants, and the anticipated large-scale enforcement in the Trump era.

Inform and educate immigrants, organizations, lawmakers, researchers, and the general public on the benefits and components of a successful legalization program

Public opinion. This study identified many examples of broad community support for DACA implementation. However, study participants also recounted how members of their own boards of directors, chambers of commerce, municipal officials, judges, state legislators, and others in a position to promote DACA instead stymied or did nothing to support its implementation.

As several respondents pointed out, misconceptions and misinformation about the undocumented not only impede an honest debate on the merits of immigration reform proposals, but present an obstacle to the kind of integrated, “whole-of-society” approach necessary to maximize the success of a large-scale legalization program. For this reason, outreach and public education on DACA and DAPA must cover not just program eligibility requirements and community resources, but underlying public fears about the undocumented and misconceptions about the legalization process. Public education and opinion can influence not just the prospects for immigration reform, but the success of legalization planning and implementation. Community-wide public education should be a legalization readiness priority. Of course, public opinion will also be extremely important as communities struggle to respond to draconian enforcement initiatives.

Program eligibility. Study participants often spoke highly of the coordinated outreach efforts, ethnic media campaigns, and community navigator model that helped connect so many undocumented youth with DACA. Many respondents, however, believed that public education and outreach around DACA, DACA-plus, and DAPA did not effectively reach beyond the motivated applicants with relatively straightforward cases who came forward early in the program. By this view, some NGOs and CBOs were slow to adapt their outreach to persons less likely to come forward, like potential applicants who were ashamed to disclose their criminal records. Others struggled or declined to reach non-Spanish speaking communities where knowledge of DACA was not yet common. Ethnic press serving the AAPI communities, for example, produced little coverage of DACA, DACA-plus, and DAPA because it did not see those programs as relevant or of interest to its audience.

In order to implement a large-scale legalization program, the immigrant-serving community must develop a means of educating the undocumented about their eligibility that both transcends and adapts to differences in populations. This approach should prioritize more intensive and continuous public education, deeper engagement with non-Spanish language ethnic media, and better coordinated communication strategies.

Provider fraud. Virtually every study participant highlighted the need for public education and outreach on the dangers posed by *notarios*, immigration consultants, and others engaged in UPL. These entities charge exorbitant fees for programs that do not exist, for benefits for which immigrants do not qualify, and for case outcomes that they cannot guarantee. The CMS team heard repeatedly that *notarios* can set up shop overnight in response to announcements or press coverage regarding an immigration benefit, and seem to outnumber and outflank immigrant-serving agencies. One study participant recounted that “right after Obama announced his executive action, notaries that day . . . started dropping fliers at front doors, going into apartment buildings.” He concluded, “they’re much savvier . . . than I think a lot of us are.” Another reported that *notarios* tried to recruit potential clients from the waiting lines of trusted community agencies. Study participants were equally critical of incompetent and unscrupulous attorneys, who (they reported) often come from the same national and ethnic communities as their victims. DACA and potential DAPA beneficiaries who cannot secure timely service from a competent attorney or BIA-accredited representative often turn to *notarios*.

While public education on this problem is a valuable service, it does not address the underlying need for legal protection and proactive law enforcement strategies. Immigrants can file complaints regarding immigration fraud to the Federal Trade Commission, state consumer protection agencies, state bar associations (for attorneys), and the Executive Office for Immigration Review

(EOIR) (for attorneys and accredited representatives). Complaints, however, are filed after the fraud has occurred. NGO/CBO and law enforcement partnerships exist in some communities, and progress has been made over the years in developing legal tools and resources to combat *notario* fraud (AILA 2009). EOIR, in particular, has created a very active fraud prevention unit, which receives reports from multiple sources on immigration fraud (including UPL) and refers cases to appropriate federal, state and disciplinary bodies. Members of CIRI and other groups have engaged in training and litigation on these issues, but the underlying problem is not being effectively or systematically addressed nationwide.

An affiliate was giving out appointments for March of 2013, in September of 2012. That was what their capacity was at that point. People are going to go to notarios because they believe they know them, or because the notario has what sounds like an attractive advantage: “I can help you right now.”

- Community organizing and support network

More than a public education challenge, it demands stronger federal legislation and an aggressive, proactive federal, state, and local enforcement response. Political leaders and law enforcement must take measures to end the widespread victimization of immigrants by *notarios*, immigration consultants and unscrupulous attorneys. The benefits of a future large-scale legalization program will be denied to countless eligible people if these pervasive practices continue.

Full funding. Legalization stakeholders frequently mentioned their need for more staff, services, and infrastructure. They argued for federal, state, and local funding, greater support from foundations, and greater transparency from funders on their decision-making processes, partnerships, and limitations. As DACA illustrates, however, NGOs and CBOs cannot depend exclusively on public and foundation funding for their work in planning for and implementing a large-scale legalization program. They will need to continue pursuing corporate funding, individual giving, contributions by parent organizations, and fees for service. To generate sufficient resources, funders of all kinds must share an understanding of why, how much, and when financial support is required.

A core group of funders and municipalities have played vital roles during DACA implementation: they have gathered diverse community groups, promoted integrated responses, shared service-delivery models from other areas, and attracted additional support. GCIR, for example, used 14 funding collaboratives to create the Delivering on the Dream (DOTD) initiative, which “leverages local funding” with national matching funds in order to support outreach, public education, legal services, and capacity building in 11 states.²² Study participants appreciated these efforts, but believed that funder-driven collaborations could not be sustained absent financial support for the time required to collaborate and for the substantive work of diverse members.

Similarly, respondents did not sustain their budgets for DACA services entirely with fees for services, nor did all programs charge for those services. Some participants reported that application fees posed a significant financial burden for families, and led many to delay or stagger submission of applications. Most agencies nonetheless recognized the importance of modest fees for DACA

²² Local funders in Omaha, Nebraska supported the creation of an integrated, service-delivery program without financial support from national funders.

services as a source of unrestricted funding and a tool for building sustainable capacity. Indeed, this insight has been central to the growth of nonprofit immigrant legal service networks over the last 20 years (CLINIC 1996). As study participants affirmed, fee-paying immigrants often value the services they receive more than those who do not pay and tend to be more active participants in their own cases. One respondent pointed out that charging fees also weeded out potential applicants who simply wanted to check on representation that they were already receiving from other sources.

The federal government, states, localities, businesses, and foundations should fully fund screening of the undocumented and legalization preparedness work, including initiatives to serve special populations. Following the presidential election, select states and localities seem to be particularly promising sources of support for legal screening of the undocumented, direct service projects for special populations, and deportation defense work. The California Department of Social Services, for example, has funded 80 nonprofit entities to provide immigration services in 2016/2017, including for services to assist immigrants seeking DACA, naturalization and other immigration benefits and relief. These kinds of programs need to be extended and expanded throughout the country.

Without sufficient funding, organizations, networks, and agencies will be unable to maximize their participation in work to put eligible immigrants on a path to LPR status and citizenship. Consistent funding from these sources will be predicated on a common understanding of legalization needs and possibilities, best practices for program implementation, and the unique needs of individual immigrant-serving organizations.

Research. One of the most pressing challenges for the immigrant-serving community is its lack of institutional memory. IRCA constituted a historic piece of legislation and a seminal immigration program. Yet the literature on its implementation is sparse, consisting of fewer than a dozen studies and reports. Reports on large-scale immigration initiatives since IRCA have been rarer, and mostly confined to unpublished funder or project reports. There is a substantial literature on the positive difference legal counsel makes in individual case outcomes, particularly in political asylum cases. Aside from legal and management training manuals, however, there is little literature on how charitable legal immigration agencies actually operate (Kerwin 2004) or on the role of civil society overall in the immigration arena (Campos 2014).

As a result, a field that suffers from high attrition and turnover must rely on the imperfect memories of its long-term members or must “reinvent the wheel,” from one needless service delivery “crisis” to the next. Lack of institutional knowledge undermines the ability of the immigrant-serving community to generate sustained increases in service, to build capacity, to create efficiencies, to exploit the strengths of its diverse agencies, to institutionalize best practices, to empower those it serves, and to transition to other pressing needs. Partnerships suffer, in particular, due to the community’s collective ignorance regarding the strengths, goals, and capacity of its diverse members.

The philanthropic community and federal, state and local agencies should support research that documents the successes, challenges, and failures of large-scale immigrant service projects. Identifying legalization implementation successes and challenges is crucial to fostering a continuous learning cycle and building a robust and growing immigrant-serving community. Longitudinal research on the socioeconomic attainment and political empowerment of program beneficiaries and their families deserves particular support.

Immigrant-serving agencies post-legalization. Community organizing agencies are strongly committed to the inclusion of DACA and future legalization beneficiaries in service-delivery and the long-term work of immigrant rights and justice. However, this study did not delve extensively into the long-term socioeconomic or political goals of these groups following a large legalization program. One overarching goal may be to ensure the full participation, inclusion, and equal treatment of immigrants and their progeny in the life of their communities and nation. However, such a goal would require immigrant-serving agencies to offer a greater range of services, advocacy, and leadership opportunities than they now provide.

To take the example of nonprofit legal immigration programs, it has been more than 20 years since the last national legal needs survey of low-income immigrants (Bach 1996). This survey found that immigrants had immense needs related to immigration status. However, they also had substantial legal needs related to their family situations, places of employment, public benefit eligibility, and their financial situations. Our study has affirmed that these needs are intertwined. Yet very few immigrant-serving agencies have been designed to meet the full spectrum of needs that impede the equal treatment and full participation of immigrants and their children in their communities.

Funders and immigrant-serving institutions should commit and begin now to create agencies and networks that take as their reference point the myriad goals and needs of the communities they serve, including but not limited to the need for immigration status. As a step in that journey, we propose that the immigrant-serving community commission a national legal needs survey that can inform the design of immigrant-serving programs and help to meet the full range of immediate and long-term needs of immigrants.

In addition, funders, service providers, government agencies, and researchers would benefit from a standard methodology for making site-specific assessments of the strengths, challenges, and needs of local immigrant service communities. As this report has found, each immigrant-serving community has evolved differently, faces different environmental challenges, and has its own character, strengths, and weaknesses. For this reason, legalization readiness planning must invariably be site-specific. The immigrant-serving community should invest in creating the tools to train local communities on a “whole-of-community” approach to legalization planning and implementation, and to assess the legalization readiness of their communities.

Legalization Planning and Implementation: A Good Investment

Reviewing the positive impacts of DACA alongside calculations of the expenses associated with a realistic legalization program, it is evident that a large-scale legalization program would be an investment with significant returns. The costs of legalization readiness can be quantified, and they pale in comparison to its benefits.

In its short life, DACA has improved the educational opportunities, employment prospects, earnings, social inclusion, and sense of personal security of recipients (Gonzalez et al. 2016; Wong et al. 2016). As with IRCA (Smith, Kramer and Singer 1996, 44-46), DACA has led immigrants to invest in themselves, build human capital, and take concrete steps to succeed in the United States. DACA will also benefit the children of program beneficiaries.

Moreover, as evidenced by DACA and DAPA, the immigrant-serving community could “fully” implement a legalization program at a relatively modest cost. The CIRI Human Resources Working Group produced a detailed analysis of the costs of implementation of DAPA and DACA by immigrant-serving agencies. It estimated that 1.1 million cases would need extensive application assistance by NGOs and CBOs. To accommodate this work would require a three-fold staffing increase, leading to a “funding gap” (assuming collection of client fees) of \$83 million (Kamasaki, Timmons, and Tudi 2015, 295).

Similarly, in 2007 in the aftermath of an early legalization planning event, CLINIC estimated that the cost to fund new nonprofit legal immigration programs, expand the capacity of existing programs, and provide representation to underrepresented groups would be roughly \$150 million over a four-year period. CLINIC’s estimates covered capacity building to serve earned legalization beneficiaries, DREAM Act and Agricultural Job Acts applicants, and hard-to-serve earned legalization populations. Its analysis anticipated a legalization program that covered a population more than twice the size of the DAPA- and DACA-eligible, making its back-of-the-envelope estimates roughly consistent with the CIRI estimates.

In short, the cost of legalization readiness activities would be discrete, quantifiable, and worth the investment. Much of the funding would need to be available prior to the program’s inception so that already taxed agencies could hire and train staff and make other infrastructure investments. If NGOs and CBOs cannot fully accommodate the needs of immigrant communities, many will turn to *notarios*, immigration consultants, and other unqualified or predatory legal practitioners. The federal government, states, localities, businesses, and foundations should fully fund the legalization readiness and implementation work of the NGO and CBO community.

V. Is the Community Ready?

The CMS team concluded most of its interviews by asking whether the nonprofit immigrant-serving community was prepared to implement a large-scale legalization program. It also asked each agency about their main legalization readiness needs.

DACA has been the avenue for me to realize my full potential.

- DACA recipient

Virtually every respondent was daunted by the potential magnitude of a legalization program. Most argued that it would be impossible to be fully prepared for such a program. One participant bluntly replied: “[C]learly we’re not prepared. We just don’t have sufficient human resources to even make a very significant dent in the current demand on these programs for legal services.” Another said: “If we get comprehensive immigration reform . . . the amount of immigration attorneys or BIA representatives that are going to be needed is nowhere near the capacity that currently exists in the field.” Another argued: “I don’t think any state is ready” and “I don’t think honestly any organization will be ready.”

On the other hand, some expressed optimism regarding the ability of their communities to coalesce and successfully implement a program, building on their current resources and capabilities. One argued that her community was “ready” due to a robust collaborative around DACA, a community plan, and a commitment to “multi-agency, large-scale workshops.” Another

characterized the immigrant-serving community as “ready in mind but not in body.” Many took the opportunity to identify the building blocks of a larger program put into place during DACA, including new networks like CIRI, the expanded use of data and technology, and the plethora of committed “community-based organizations and people.”

Many agencies made the point that community readiness depended, in part, on the structure of the program itself, including the:

- eligibility and evidentiary requirements;²³
- size of the population covered;
- availability of federal, state, and local funding;
- lead time between passage of legislation and the application period and length of the application period;
- enforcement provisions in the bill and the level of enforcement during the application period;
- eligibility of family members of primary beneficiaries for derivative status; and
- cost of applying.

As these concerns suggest, immigration reform legislation must be crafted to encourage potential program beneficiaries to come forward in high numbers and must lead to high approval rates (Kerwin and Wheeler 2004, 20-23; CLINIC 2013, 15-16). Unfortunately, two pillars of an effective, legalization implementation response have been neglected in recent CIR bills: a massive, multi-lingual public education campaign and support for the work of NGO and CBO immigrant-serving networks.

Immigrant-serving agencies will also need time to hire and shift staff, educate the community, recruit and train volunteers, and otherwise build capacity between passage of legislation and the application period. In addition, advocates need to think strategically about the size and shape of the US immigration enforcement system *during* a legalization program when attempted undocumented migration may well increase and after the program’s completion when the need for the status quo enforcement system should diminish and new service delivery models will be needed.

VI. Conclusion

This report has examined the diverse community of immigrant-serving agencies, which has arisen in response to the needs of the historic number of foreign-born persons and their family members in the United States. This community has assisted countless individuals to secure the immigration benefits and relief available to them under the law. It has also served a steady stream of

23 Beyond cost, DACA’s education requirements, for example, served as the second most substantial barrier to accessing the program. Many participants also highlighted DACA’s demanding evidentiary requirements, and most believed that the DAPA requirements would be even more difficult to meet. Some speculated that DAPA beneficiaries would not be able to participate in program implementation to the extent of DACA recipients, who included a high percentage of English-speaking, long-term residents, many with extensive advocacy experience and the ability to contribute substantially to the program.

discrete, special populations of immigrants, including DACA recipients. The community has faced extraordinary operational challenges and suffered from chronic underfunding. Nonetheless, it has built remarkable capacity and capabilities, including during the DACA era, which will undergird the nation's response to the next large legalization program, as well as community responses to the threat of massive deportations. This report recommends significantly increased investment in the multi-faceted work of this community, in order to prepare for a legalization program, to legalize immigrants in the only way available to them at present, and to respond collectively to the Trump administration's immigration and refugee policies.

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Appendices

Appendix A: Growth in BIA-Recognition and Accreditation

Appendix B: Overview of Study Methodology

Appendix C: Project Timeline

Appendix D: Literature Review on DACA and Past Legalization Implementation Efforts

Appendix E: Interview Questions

Appendix F: Demographic Analysis of Site-Visited Communities

Appendix G: Regional Collaboration Map and Activity Chart

Appendix A: Growth in BIA-Recognition and Accreditation

Newly Recognized/Accredited BIA Agencies, Sub-Offices and Representatives during Four-Year Time Frame			
-	June 15, 2008 - June 11, 2012*	June 15, 2012 - August 29, 2016	
State	Number of Newly BIA-Recognized Offices and Sub-offices	Number of Newly BIA-Recognized Offices and Sub-offices	Number of New Unique Representatives Accredited ¹
AL	2	1	5
AK	0	0	0
AZ	5	9	30
AR	0	0	0
CA	28	71	232
CO	4	6	19
CT	4	4	22
DE	2	1	4
FL	4	27	48
GA	2	7	17
HI	0	0	1
ID	1	1	8
IL	15	21	76
IN	4	12	17
IA	4	0	4
KS	2	4	9
KY	1	3	7
LA	1	0	4
ME	1	0	1
MD	2	4	10
MA	4	24	44
MI	7	15	25
MN	7	0	10
MS	0	0	3
MO	5	0	4
MT	0	1	2
NE	1	4	16
NV	2	5	7
NH	3	0	1

NJ	10	10	21
NM	2	5	10
NY	28	47	127
NC	16	13	25
ND	0	2	1
OH	5	4	12
OK	0	1	5
OR	2	8	20
PA	5	9	19
RI	1	0	6
SC	1	4	4
SD	0	1	1
TN	2	5	11
TX	21	29	128
UT	0	1	4
VT	0	1	1
VA	6	11	25
WA	9	13	44
WV	0	1	1
WI	3	12	25
WY	2	1	1
DC	2	3	5
National Numbers	226	401	1122

* BIA rosters include the dates of BIA agency recognition, not the dates when individuals became accredited. However, they also list the individual names of BIA-accredited representatives. CMS received rosters for 2016 (August 29, 2016) and 2012 (June 11, 2012), but not for 2008. Thus, we could determine the overall and net increases in BIA-recognized agencies and accredited representatives during this period. For the period between June 15, 2008 and June 11, 2012, we calculated the increase in newly recognized agencies by adding all the agencies (as of 2012) that were reported to have received recognition after June 15, 2008. Given data limitations, we were not able to calculate the increase in or the number of newly accredited representatives between 2008 and 2012.

The methodological problem is that offices and sub-offices with recognition on June 15, 2008 or thereafter could have lost recognition by 2012 and thus would not be reported on the BIA roster for 2012. As a result, the 2008 BIA-recognition numbers (based on the 2012 roster) almost certainly undercount the number of BIA-recognized offices and sub-offices that operated between 2008 and 2012.

1. Accredited representatives may work at multiple BIA-recognized offices and sub-offices, which is why the actual number of individuals accredited is denoted by the term “unique” (“Number of Unique Representatives Accredited”). As a result, some accredited representatives are reported as working in multiple recognized offices and sub-offices, including in different states. For the state breakdown of “Number of Unique Representatives Accredited,” CMS distributed the accredited representatives working in more than one states equally amongst the states where they were reported working.

Appendix B: Overview of Study Methodology

The study had a tight timeline (Appendix C). CMS and OSF/ELF II hoped that its findings would benefit the anticipated DAPA and DACA-plus programs. The Supreme Court's decision in *United States v Texas* made the report less urgent, but it remains timely in light of the ongoing DACA program and the importance of legalizing eligible persons under existing laws.

CMS's methodology for the study was straightforward. First, it created two research teams, one in New York led by Donald Kerwin and one in California led by Roberto Suro at the University of Southern California (USC). It also enlisted Professor Tom Wong as a project advisor.

Second, the USC team produced a literature review on legalization implementation, which covered the period from the Immigration Reform and Control Act of 1986 (IRCA) through DACA (Appendix D). This review evaluated how effectively capacity met need in past legalization programs, identified implementation challenges and successful practices from these programs, and set forth methods of assessing capacity and addressing gaps in service.

Third, the CMS team conducted telephone interviews with 28 persons from 18 national and regional NGO/CBO networks (most of them CIRI members), local government agencies, and private funders (Appendix E). Counting site visits, the project included interviews with 66 persons from 40 agencies. Prior to the interviews, the CMS team surveyed participating agencies regarding their legalization-related services and use of demographic data and technology. The surveys and interviews sought to identify DACA program successes and challenges, the capacity built during DACA, and the readiness of the NGO/CBO community to accommodate a large-scale legalization program.

Fourth, based on a series of consultations, the CMS team identified 12 diverse communities for more intensive analysis and review. Ultimately, it selected the state of Nebraska; Houston, Texas; Queens, New York; Miami, Florida; and Fresno, California for site visits. CMS concluded that no set of five communities could collectively capture the diversity of the US immigrant population and the full spectrum NGO/CBO legalization readiness responses. However, intensive analysis of individual communities provided important insights into effective models, implementation challenges, and legalization readiness needs.

In anticipation of its site visits, CMS's Senior Fellow Robert Warren produced detailed demographic reports on the foreign-born, the undocumented, and the DAPA and DACA populations in these five communities (Appendix F). This work allowed CMS to compare potential need with capacity in the targeted communities. CMS teams shared these analyses with study participants and familiarized them with implementation resources.

The researchers conducted multiple interviews in the five communities. They also met with select funders and local government officials. To round out its study, CMS conducted a handful of interviews with DACA and potential DAPA beneficiaries. It also collected and reviewed select agency reports and data.

Appendix C: Project Timeline

Task	Assigned To:	Due Week Ending On															
		5/27	6/3	6/10	6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	Sep
Assemble research team	Roberto & Daniela																
Provide feedback on questionnaire for NGOs	All																
Schedule interviews with NGOs	CA and NY Research Teams																
Complete interviews with national and regional NGOs	CA and NY Research Teams																
Draft literature review on NGO capacity and immigrant needs	CA Research Team																
Complete demographic analysis of US unauthorized, DAPA- and DACA-eligible	Bob																
Develop a base-line description of immigrant needs	Bob & CA Research Team																
Provide feedback on draft literature review	All																
Complete demographic detailed analysis of the unauthorized in five communities	Bob																
Finalize literature review	CA Research Team																
Select five local communities for detailed analysis	All																
Prepare list of CBOs in five sites for focus groups and interviews and reach out to reserve possible meeting dates	CA and NY Research Teams																
Prepare questionnaire for CBOs	CA and NY Research Teams																
Provide feedback on questionnaire for CBOs	All																
Schedule focus groups with CBOs	CA and NY Research Teams																
Schedule interviews with individual CBOs	CA and NY Research Teams																
Complete focus groups with CBOs in selected communities	CA and NY Research Teams																
Complete interviews with CBOs in selected communities	CA and NY Research Teams																
Develop questionnaire for interviews with unauthorized immigrants	CA and NY Research Teams																
Provide feedback on questionnaire for unauthorized immigrants	All																
Conduct interviews with unauthorized immigrants and families in local communities (questionnaires will be modified to account for findings/info obtained in CBOs focus groups and interviews)	CA and NY Research Teams																
Draft full report	All																
Provide feedback on draft report with findings and recommendations	All																
Finalize report	All																
Roll-out report	All																

Appendix D: Literature Review on DACA and Past Legalization Implementation Efforts

In the past 50 years, two immigration policy shifts have occurred. The first was a mass legalization program through the Immigration Reform and Control Act (IRCA) of 1986. The second, a temporary exercise of administrative discretion, Deferred Action for Childhood Arrivals (DACA), was announced by President Barack Obama in 2012. This two-year program went through its first renewal in 2014. Drawing on an extensive body of literature, we examine DACA in order to understand how it has been functioning until now, and how well the capacity of permanent legislation and temporary programs has been able to meet need.

During IRCA's implementation process, Congress approved four billion dollars as part of a "State Legalization Impact Assistance Grant."¹ States and local governments were able to receive reimbursement for services provided to individuals applying for the legalization program. These services included "language and civic classes, educational, health and welfare services."² Additionally, community organizations had agreements with Immigration and Naturalization Service (INS) which placed them under Qualified Designated Entities (QDEs). In total, there were 980 QDEs which included "nonprofit organizations, church groups and unions."³ QDEs continuously coordinated with INS in order to better assist applicants through the legalization process and provided legal services when complex situations arose.

Despite the support provided, IRCA was widely criticized due to the lack of successful outreach, lack of uniform organization across the four INS regions, and delayed application processing. There was constant confusion as INS had different interpretations of the different provisions undocumented individuals needed to meet. It also became very difficult to gather documents in order to prove existence in the United States, it was unclear which documents were acceptable as proof, and once applications were submitted, it was difficult to track progress. These issues led immigrant advocates to engage INS in lawsuits in order to move towards less complex rules of eligibility and a less complicated application process. Under this mass legalization program, there were about three million undocumented immigrants that were permanently legalized and eventually pursued citizenship.⁴

Beyond the design of DACA as a policy, there was not much thought put into program implementation and what the long-term goals would be.⁵ DACA targeted a specific group of undocumented individuals. Those who did not meet age or schooling requirement, and had a criminal history were immediately ineligible to apply. Following the first year of DACA's implementation, only 32.5 percent of all possible applicants which included those eligible and not yet eligible had applied.⁶ Of the DACA-eligible population, 61.2 percent applied within the first year.⁷ The rate of approval for applications submitted was 98.3 percent, and only 1.7 percent was denied.⁸ Although DACA was successful at providing temporary deportation relief to a specific group of undocumented individuals, it did not provide a solution for all.

As DACA was implemented, differences across states, gender, and applicant's origin proved to be a barrier to a successful DACA implementation. Across the United States, levels of implementation varied as not all states have an equal number of DACAmented individuals. Research suggests that the rate of state-level implementation is lower than expected, and that states such as California, Texas, and Florida should have a higher number of DACA applications submitted than those

currently recorded.⁹ Across states, there are also differences in the number of female and male DACA applicants. Along the West Coast, the percentage of female applicants is higher while along the East Coast and Southern States there is a larger percentage of male applicants.¹⁰ Differences across the United States clearly impact the likelihood of becoming a DACA beneficiary. DACA's implementation has not been able to meet the need of all undocumented individuals across states.

Furthermore, there are also differences among applicant origin which affects the ability of DACA to meet their needs. Research suggests that 71.1 percent of all DACA eligible individuals are born in Mexico, which creates an issue of overrepresentation.¹¹ Although the Asian American community represents one of the top groups of origin for DACA applications, the number of Mexicans and Central Americans applying to DACA far outweighs Asian applicants.¹² As DACA reached its two-year mark, the number of Asian Americans and Pacific Islanders (AAPI) applying to the program continued to remain low.¹³ In an assessment of DACA-related services provided to AAPIs, almost 30 local and national organizations that offered DACA assistance were identified.¹⁴ However, only a few of these AAPI-serving organizations were capacitated to provide adequate support.¹⁵ Lack of collaboration with broader networks of organizations resulted in having a limited outreach capacity to undocumented communities. When reaching out to inform AAPI eligible youth, many of these organizations faced challenges due to the shame and fear associated with being undocumented. These organizations were unable to form strong connections, or shape and influence views associated with being an undocumented AAPI, which resulted in low success rates of AAPI youth applying for DACA.¹⁶

The burden of implementing DACA fell on community organizations and legal aid agencies. Immigrant-serving institutions were given no guidance, no funding, and only 60 days to prepare for the launch of DACA.¹⁷ For civic organizations such as the Coalition for Humane Immigrant Rights of Los Angeles (CHIRLA) there was a great deal of uncertainty as to the application process and the type of services that needed to be provided. Overall, no civic organization was prepared to provide the type of services this temporary program required. Despite having no preparation, these civic organizations proved to play a significant role in the success of DACA's implementation. A survey conducted for the National UnDACAmented Research Project (NURP) revealed that 93 percent of their DACA recipient sample had received assistance with the DACA process from "civic organizations, legal clinics, schools, religious institutions, and private attorneys within their communities."¹⁸ Whether individuals were directly assisted by these community organizations, or where directed to them, organizations continued to be important.

Unsurprisingly, evaluations of IRCA and DACA implementation processes have found that the first to apply for these programs are those who are "best prepared" for legalization efforts.¹⁹ These are typically the easiest cases, people who could all but guarantee that they were going to receive DACA. The next sections identify some of the challenges that organizations identified in implementing DACA and that can get in the way of applicants who are perhaps hesitant to shine a light on their immigration case. This literature also details the best practices we can identify to promote broader implementation of future policy.

IMPLEMENTATION CHALLENGES

In 1988 researchers found that IRCA applicants faced challenges such as "excessive documentation, high cost of processing, authorization, inadequate public education, and poor planning" in

completing their application.²⁰ Nearly 30 years later and similar observations are made among DACA-eligible youth. The National UnDACAmented Research Project (NURP) is the first national survey of DACA recipients and finds that DACA-eligible youth who did not apply reported lower levels of schooling, longer workdays, having lower levels institutional trust, and being more likely to have their own children relative to those who do apply.²¹ Lower levels of income, increased household financial responsibilities, and a shortage of time evidently decrease one's likelihood of applying for legalization. Indeed, NURP researchers report that 43 percent of those who did not apply refrained from doing so because of economic limitations. Other influencing factors include being less connected to academic and community-based institutions. Non-applicants in the NURP study reported missing paperwork (22%), fearing sending their personal information to the government (15%), and some reported not knowing how to apply (10%), which can be in part due to institutional disenfranchisement.²²

As a dress rehearsal for potential future legalization programs, the implementation of DACA illuminates the challenges communities and individuals face in their application and that organizations face in their outreach and service efforts, which can inform future relief and legalization programs. Data shows that the successful implementation of DACA is not uniform across states and that not all national origin groups are benefiting equally.²³ One of the primary concerns of DACA implementation research is explaining the gap between the estimates of the eligible population and actual applications received as a way to close it. Below we discuss the potential individual and structural level challenges for implementing DACA on the ground.

Individual challenges

Documentation and government mistrust

Immigrant integration researchers have long noted the challenges that obtaining and maintaining appropriate documentation for immigration reform (IRCA) and executive action (TPS) efforts.²⁴ This is especially true among undocumented women who are relegated into private and isolated occupations, like domestic work.²⁵ Undocumented youth who grow up without their biological parents and are financially independent might be unaware of the importance of keeping documentation that prove long-term residence such as school records or remittance receipts secure and thus are left out of temporary relief programs and ultimately, immigration reform.²⁶ Many have the appropriate documentation but fear sharing personal information with the government because of the fear of deportation or negative consequences on citizen and noncitizen family members if applications are declined.²⁷

Confusion on the ground

Many program eligible individuals also face challenges related to the meanings, parameters, and benefits of administrative relief programs. The fight for the rights of undocumented immigrants and undocumented young people dates several decades. Youth who now qualify for DACA are beneficiaries of a patchwork effort in response to a failed federal bill, the Development, Relief, and Education for Alien Minors (DREAM) Act that was first introduced in 2001.²⁸ In 2010, the DREAM Act made it through the House of Representatives but not through the Senate. State-level relief, such as the California Dream Act passed in 2011, adopts some provisions of the federal bill. The long history, fluctuating tides, and similar sounding titles of these proposals, bills, and programs can create confusion on the ground as undocumented immigrants attempt to make

sense of what has been implemented versus what remains in the proposal stages. The lack of access to information and high-quality services among low-income immigrants creates challenges that might keep people from applying for relief but also for program renewals. For example, the renewals for the second stage of DACA were affected by the lack of outreach, information, and uncertainty about how the renewal process might unfold.²⁹

Language barriers

Adding to the confusion is the inaccessibility of multilingual information, primarily for non-English and Spanish language speakers. Indeed, 74.9 percent of successful applicants are of Mexican origin, followed by 11.8 percent North and Central American, and 6.9 percent from South America, which are predominately Spanish-speaking countries.³⁰ However, misconceptions of the undocumented immigration population as solely Latino can disadvantage other ethnic groups in need of program information and legal aid materials. Asians are found to be underserved.³¹ One possible explanation is that Spanish language media is more effective at publicizing DACA and its requirements than other ethnic media outlets.

Language also poses a barrier for Latinos who navigate the legal aid landscape to avoid scammers. In their home countries, Spanish-speaking immigrants use *notarios* for professional legal services. In the United States, *notarios*, or notaries, are state-commissioned officials with a limited menu of public duties. Spanish-speaking notaries in the United States take advantage of this linguistic technicality to tap into the citizenship and relief program application market, charging high fees and making false promises as they submit applications. DACA and future programs are described as “fertile ground for scammers” looking to capitalize on trusting immigrants.³²

Structural

Costs of implementation

Eligibility for DACA requires providing multiple forms of documentation as well as a \$465 application fee. As noted, the implementation of DACA varies by state and socioeconomic conditions have much to do with this. The socioeconomic landscape of immigrant communities has proven to be a key predictor of DACA implementation. For example, Wong and Garcia find that as unemployment increases in any given state, DACA implementation experiences a significant decline.³³

The costs of DACA on applicants are also emotional and social, as the stigma against undocumented immigrants can be inhibiting. This has been particularly difficult within the Asian American and Pacific Islander community.³⁴ Interviews with AAPI community organizers, reporters, and self-identified DREAMers highlight the feelings of shame associated with coming out as DACA-eligible because Asians remain out of the spotlight in the undocumented immigrant movement and because ethnic media outlets remain silent on the issue.³⁵ Overcoming the emotional and social costs of applying for DACA is a prevalent challenge.

Community-based organizations also confront the challenges of meeting the costs of DACA implementation. Although DACA is a federal program, its implementation relies on local coordination by community intermediaries. Singer and colleagues write, “Nothing in the executive action gave an explicit role or funding to intermediaries, but they ramped up services quickly.”³⁶ The funding immigrant-serving organizations run on comes from county governments, foundation donors, and organization membership fees and donations. Without government and

state support, these organizations might be slow to develop community information forums, employee training, application clinics, and multilingual materials for distribution.

Limited consulate involvement

Researchers have reported an overrepresentation of Mexicans in DACA applications, which parallels the trends of IRCA. Immigration Policy Center estimates that undocumented youth born in Mexico comprise 71.1 percent of all DACA-eligible persons. A 2013 analysis found that those from Mexico were slightly overrepresented in the DACA applications received until then, as they comprise 74.9 percent of those who applied.³⁷ At the same time, reports find that the Mexican Consulate was among the most active in supporting immigrants in application process. A critical component of the application process is the establishment of foreign identity, which leads many to turn to consulates in order to obtain birth certificates or apply for passports and consular ID cards. After the announcement of DACA, Mexican consulates extended their hours to help DACA-eligible individuals gather the necessary documentation in order to apply.

Given the above-mentioned obstacles immigrants face in obtaining required documentation and information in their native language, this played a strong role in facilitating Mexican-national overrepresentation in applications. The involvement of the Mexican consulate also worked to enforce trust in the government as applicants received support from their home country's government in applying for relief. Just as the involvement of the Mexican consulate supported the application process for Mexican nationals, the lack of involvement of other consulates and institutions, such as school districts, and players, like employers, can impede potential beneficiaries from applying.

BEST PRACTICES

Studies on the impact of DACA find that beneficiaries experience a pronounced increase in economic opportunities through jobs, internships, and access to bank and credit accounts.³⁸ They also obtain driver's licenses, health care, social confidence, and brightened aspirations for the future.³⁹ Overcoming the challenges faced in implementing administrative or legislative programs is critical in not only contributing to the effective dissemination of a legalization program, however temporary, but promoting the well-being of immigrant communities. To combat some of the challenges immigrants face in accessing DACA and its benefits, funders, organizations, and community leaders have suggested a variety of "best practices" to reach first-time DACA applicants and build a robust infrastructure for eventual immigration reform. We now turn to discuss these.

National and Regional

Collaboratives and coalitions

The formation of collaboratives and coalitions serves to overcome challenges associated with the isolation of community organizations. The Administrative Relief Resource Center has identified regional coordination and funding collaboratives as an effective immigration service implementation strategy.⁴⁰ They describe "Regional Coordination Collaboratives" as "those that bring a broad range of partners together to form contingency and coordination plans for a full implementation launch." Funding collaboratives "bring funders together to learn about immigration issues, connect with other funders and partners, and collaborate with grantmaking colleagues

on strategies for immigrant-related funding locally, regionally, and nationally.” Organized in this way, immigrant rights advocates receive directives that can increase outreach by empowering some toward financing implementation efforts and others toward strategic planning and program management. These collaboratives have been initiated in regions throughout California, New York, Wisconsin, Illinois, and others.

With greater resources, the various social and emotional stages of legal application processes can be addressed. While meeting the needs of community education and application processes is important, so too is addressing the in-between where many immigrants might decide to abstain from application for fear of retaliation from the government. That is, institutions should work toward alleviating the doubt and fear that individuals have about sharing personal information with government officials. During IRCA implementation, “legalization offices” were established to overcome mistrust between immigrants and federal immigrant enforcement. Legalization offices were estimated to have processed 71 percent of applications.⁴¹

Recent evaluations of DACA find that during the first two years of implementation, the addition of one immigrant-serving organization led to an increase of 70 DACA applications.⁴² Building coalitions, delegating tasks, and releasing community organizations to implementing legalization programs will increase the reach of relief. These organizations should continue to share best practices to increase capacity.

Providing financial and documentation support

The barriers imposed by the cost of applying for legalization programs go beyond temporary relief programs like DACA to affect naturalization processes. During the implementation of IRCA, Congress provided \$4 billion in State Legalization Impact Assistance Grants to reimburse state and local governments for various services being produced to those applying for legalization. Funding was also allocated to 200 agencies and community organizations recognized as QDEs. With government funding to compensate workers and overhead costs, these 200 service providers collected a mere \$15 per completed application for legal status, which made applying for legalization more accessible to undocumented immigrant communities.

Earlier in 2016, the Department of Homeland Security proposed to reduce the fee for naturalization applicants with family incomes greater than 150 percent and not more than 200 percent of the Federal Poverty Guidelines. The reduction of the naturalization fee to \$320 dollars enables an approximate one million adults who would be eligible to apply but are financially constrained (out of a possible eight million) to apply for naturalization.⁴³ Similar DACA fee waivers or loan programs have been suggested by legalization advocates.⁴⁴

A lesson learned from the case of Mexican-origin youth contrary to AAPI youth who applied for DACA is the importance of consulate and school district involvement in providing applicants with their required documentation. Facilitating the collection of documentation necessary to apply for legalization programs promotes application and improves chances of success.

Employing ethnic media outlets

Ethnic media plays a critical role in disseminating information, particularly to those disenfranchised from civic associations. In the case of AAPI communities, EunSook Lee suggests targeting individuals from five countries: the Philippines, China, South Korea, India, and Pakistan.⁴⁵ Ethnic

media not only reaches diverse ethnic groups but also age groups, as ethnic media is often the primary source of information for older immigrants while younger immigrants are more digitally connected. Organizations that have worked with ethnic media outlets in crafting compelling images, frames, and dialogue have been most effective in reaching their intended audience.⁴⁶

Local

Community education and outreach

Given the finding that location matters, local outreach efforts can work to target resource-limited communities. These efforts include educating undocumented immigrants on the programs and processes for application, as well as the native-born population on the impact of immigrant legalization and incorporation to bolster community collaboration. One suggestion in doing so is to develop mobile legal clinics.⁴⁷ Others have suggested working with educators, parent associations, and school districts to broaden the number of people reached.⁴⁸ Churches and unions should continue to be focal points for reaching those who mistrust government institutions and work in the informal economy.

Community education should include clear outlines of the possible forms of relief immigrants are eligible for. In a national survey of 67 immigrant-serving organizations, researchers found that 14.3 percent of those eligible for DACA were also eligible for another form of immigrant relief, including lawful permanent residence.⁴⁹ Organizations should also educate potential applicants on the trusted sources of application assistance. Every nine out of 10 respondents of the NURP study reported receiving assistance with their DACA application from community organizations, professional attorneys, and individuals within their network.⁵⁰ Elaborating on credible sources of support can reduce fraud and scamming by *notarios*. Interested individuals, eligible or ineligible, can be informed on how to become leaders, activists, and supporters of the legalization of others to strengthen trust in the program.⁵¹

These efforts should not be initiated at the announcement of a new legalization program but also in the waiting period. NURP researchers found that those who were most engaged with civic organizations were most likely to apply for and successfully obtain DACA.⁵² Having already developed ties to immigrant communities, organizations can better cater outreach efforts in the wake of a new legalization program.

The power of social media

Low and high-tech outreach is necessary to reach the various segments of the undocumented immigrant population. Social media is used to bolster the outreach and activist efforts of community-based organizations and integration of immigrant communities.⁵³ Community education can be achieved through avenues such as Facebook, Twitter, Instagram, and various blog platforms. Noting the effectiveness of the undocumented youth movement in employing social media to engage community members and community-based organizations in disseminating information regarding forums, drives, and demonstrations, highlights the importance of social media in implementing future legalization programs.

During IRCA and DACA implementation, various conflicts have arisen in providing acceptable proof of consistent residence in the United States. Social media not only provides a space for sharing program information, but also matters in proving physical presence in the United States

for those who lack necessary documentation but who consistently participate in social media communities. Using social media check-ins, photos, and interactions can provide applicants with evidence regarding their locations, along with dates and times of notable events.

ASSESSING CAPACITY, IDENTIFYING GAPS

In order to answer our question of how to assess whether future NGOs have the capacity to take on these immigration programs, we have derived our recommendation from literature reviews. In the past, in order to evaluate whether capacity has been met, researchers have conducted interviews with community leaders, community organizations, and lawyers, and surveyed DACA beneficiaries. Researchers have found discrepancies among states, ethnic groups, and genders, as well as civic organizations. In order to better serve the needs of the undocumented population, successful implementation should be measured across states, gender, and ethnic groups, as well as the ability of civic organizations to provide services such as language-oriented orientations. Below we discuss what measures of preparedness should be taken in order to measure whether CBOs have the capacity of taking on these immigration programs.

When comparing the implementation process of IRCA with DACA, it is clear that community organizations received more support in implementing the mass legislation program of 1986. Under IRCA, civic organizations were provided with funding in order to assist individuals through the legislation process and were in continuous communication with INS. On the other hand, when DACA was implemented, civic organizations, which played a crucial role in the process, were the intermediaries but were given no funding to provide services. In order for NGOs to have the ability to take on immigration programs such as DACA, a measure of preparedness would be to establish coordination among federal, state, and local governments.

Along with coordination among different levels of government, a measure of preparedness would also include capital support. The implementation process of IRCA included funding in order to provide classes to better inform and prepare individuals who were applying for the legalization process. However, when analyzing DACA, this type of support was not available for CBO's. Organizations were left to finance their programs on their own. This created issues, as community organizations were working individually and did not belong to a larger network such as the QDE's established through IRCA. Through the literature we identified that, as a result, there were disadvantages between ethnic groups. Community organizations providing services to ethnic groups such as AAPIs were at a disadvantage. In order to better support the needs of the undocumented population, the ability of community organizations to provide services such as language-based orientations should be assessed.⁵⁴

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Appendix E: Interview Questions

INTERVIEW QUESTIONS FOR SITE VISITS

Interviewees: Local community organizations and service providers in targeted communities.

Project Description: A team of researchers, coordinated by the Center for Migration Studies (CMS), is evaluating the readiness of nongovernmental and community-based organizations (NGOs and CBOs) to implement a large-scale legalization program for undocumented immigrants. The study will assess the progress made by the NGO/CBO community in preparing for legalization since June 2012, when President Barack Obama announced the DACA program.

In site visits to five communities, the CMS team will attempt to assess the work of diverse groups (legal and non-legal) and the NGO/CBO community as a whole in preparing for a legalization program. The site visits will also seek to determine how this work is being coordinated on a local level and if it is leading to new capacity to serve and empower immigrants. We hope to keep this interview to an hour. We would also like to record this interview so that we can have it transcribed and fully capture your responses.

Instructions for Interviewer: Interviewers should use these questions to probe, not prompt those being interviewed. Get permission to record.

Organization:

Interviewee/Contact Information:

Legalization Readiness Work of Individual Organization

1. What work has your agency done on the DACA program and in preparing for legalization more broadly (which we'll call "legalization readiness" work) since the creation of DACA? (Screening for immigration benefits? Naturalization? Community organizing? Policy advocacy? Other?)
2. What populations do you work with? How do you identify potential unauthorized populations? Do you use demographic information?
3. What have been the most successful approaches to helping individuals apply for immigration programs like DACA? What have been the greatest challenges?
4. What was your organization doing to prepare for DAPA? Did you continue to do work related to the DAPA and DACA-plus programs following the injunction? If so, what were you doing?
5. What have been the primary obstacles faced by persons you serve face when it comes to applying for DACA? Are any of these obstacles specific to certain populations? How has your organization responded to them?
6. What populations are underserved in the community? What legalization readiness needs have not been met?
7. Has your organization built "capacity" to respond to the needs of potential beneficiaries of DACA and other persons without immigration status? What kind of capacity? Is the capacity sustainable in the long-term? If so, how will it be sustained?

8. Does your organization use technology and online support in providing legalization services? Does this technology help you to expand services and to build capacity? What sorts of technology and on-line support has been most useful? What, if any, have not been useful?
9. How has your organization done community outreach programs for DACA and other forms of immigration relief? What has been successful? What has not been successful?
10. What are your organization's top unmet or insufficiently met needs as you consider and prepare for a larger legalization programs?

Legalization Readiness Work of the Community and Division of Labor

11. With what other local organizations or coalitions have you partnered on DACA-related, , legalization readiness, or related programs? How is the work coordinated and divided between the groups in the community? Who does what? How do the groups come together?
12. What are the gaps in the community's response? Are there institutions that should become engaged to a greater degree in legalization activities?
13. What are the sources of funding for this work? What work does the funding support? What are the greatest funding needs?
14. Have any organizations in the community done group screening of unauthorized persons for immigration benefits or relief beyond DACA?
15. What national or regional partnerships or coalitions does your organization participate in? How have these partnerships benefitted the work on DACA and legalization readiness? What additional support from these partnerships would benefit your work?
16. Has your agency partnered with national, state, county, or local government agencies on DACA-related and legalization work? Has your organization benefited from these partnerships?
17. What are the most important lessons learned from the work that you have done on DACA and legalization readiness?
18. How successful has your community been in engaging actual or potential legalization beneficiaries in the long-term work of immigrant integration, empowerment and social justice?
19. Do you have any suggestions for reports, resources or models that we should review in order to assess and better understand the readiness of the community for legalization?
20. What have we forgotten to ask? Any final thoughts?

INTERVIEW QUESTIONS FOR NATIONAL AND REGIONAL NON-GOVERNMENTAL AGENCIES (NGOs)

Interviewees: National and regional NGO leaders

Project Description: A team of researchers, coordinated by the Center for Migration Studies (CMS), is evaluating the readiness of nongovernmental and community-based organization (NGOs and CBOs) to implement a large-scale legalization program for unauthorized immigrants, whether a legislative program or an administrative program like Deferred Action for Childhood Arrivals (DACA) or Deferred Action for Parents of Americans and Lawful Permanent Residents (DAPA). The study will assess the progress made by the NGO/CBO community in preparing for legalization since June 2012, when President Barack Obama announced the DACA program. Most of the groups we're interviewing are nonprofit entities that work with immigrants in different ways. However, in a few cases, we'll be interviewing government entities involved in legalization readiness work, as well as nonprofits that work with immigrants, but not on immigration issue per se.

We hope to keep this interview to an hour. Let us know as we go along when a question is not relevant to your work and we will skip it. If your agency leads or supports a network of entities, we'll generally want you to speak about the work of your network. However, there will be some questions in which it's more appropriate to speak on behalf of your individual agency. If you don't lead or support a network, please answer on behalf of your individual agency throughout.

Instructions for Interviewer: Interviewers should use these questions to probe, not prompt those being interviewed.

Organization/Network:

Interviewee/Contact Information:

Questions

1. Since the President announced the creation of the DACA program in June 2012, can you describe the work you've been doing on this program?
2. After the President announced the new executive actions on immigration in November 2014 -- DAPA and DACA-plus -- but before the injunction, can you describe what your network or organization was doing to prepare for DAPA?
3. After the injunction, has your network or organization continued to do work related to the DAPA and DACA-plus programs? If so, please explain.
4. During the injunction, what bucket or buckets of work has your network or organization focused more resources and attention on? For example, screening for forms of immigration relief other than DACA or DAPA? Naturalization? Community organizing? Policy advocacy? Or other work?
5. What has your network or organization done to identify or assess the potential obstacles that individuals in the communities you serve face when it comes to applying for legalization programs like DACA and DAPA?

6. Has your network or organization relied on demographic data in planning or structuring its work? If so, please explain.
7. We asked you at the outset about your work on DACA. We'd now like to ask specifically about work you've been doing to build legalization "capacity" in whatever area is relevant to you.

Since DACA was announced four years ago, has your network or organization built "capacity" to respond to the needs of potential DACA beneficiaries? Please explain. [probe for quantitative metrics]

8. During this same time period, has your network or organization built "capacity" when it comes to other forms of immigration relief? Please explain. [probe for quantitative metrics]
9. Is the capacity that you have built sustainable in the long-term? If so, how will it be sustained?
10. What would you say are the most important lessons learned from the work that you have done when it comes to implementation of the original DACA program? What do these lessons tell us about what we should be doing to prepare for a larger legalization program like DAPA or a future legislative program?
11. In general, what would you say are the top three unmet or insufficiently met needs that organizations have as they prepare for larger legalization programs?
12. In your opinion, how successful has the NGO/CBO community been in engaging actual or potential legalization beneficiaries (including for DACA and DAPA) in the long-term work of immigrant integration, empowerment, and social justice? Please explain.
13. Have you partnered with other organizations or coalitions when it comes to your DACA-related work?

If so, would you say that your network or organization has benefited from these partnerships? What additional support from these partnerships would benefit your DACA-related work? Please explain.

14. Have you partnered with national, state or local government agencies when it comes to your DACA-related work?

If so, would you say that your network or organization has benefited from these partnerships? What additional support from these partnerships would benefit your DACA-related work? Please explain.

15. When it comes to efforts to do outreach to the community about programs like DACA, what has your network or organization found to be successful? What has not been successful? Please explain.
16. When it comes to helping individuals apply for immigration programs like DACA, what has your organization found to be successful? What has not been successful? Please explain.
17. Do you have any suggestions on groups, models, or written resources that we should review in order to assess and better understand the readiness of the NGO community for legalization?

Appendix F: Demographic Analysis of Site-Visited Communities

I. Comparative Demographic Analysis of Five Site-Visited Communities

Table A-1. Estimated population in the study area, by type of population: 2014

Area	Undocumented population (1)	Foreign-born population (2)	Percent undocumented (3)=(1)/(2)	Eligible for DACA (4)
US total	10,912,500	42,235,700	24%	1,258,000
Houston	586,300	1,498,900	37%	65,600
Fresno	61,200	210,500	27%	7,100
Nebraska	42,400	120,100	33%	2,700
Miami metro area	360,700	2,317,500	15%	46,800
Queens	223,800	1,118,000	19%	17,100

Source: Center for Migration Studies and American Community Survey.

Table A-2. Selected characteristics of the undocumented population in the study area: 2014

Characteristic	US total (1)	Houston (2)	Fresno (3)	Nebraska (4)	Miami (5)	Queens (6)
Total population	10,912,500	586,300	61,200	42,400	360,700	223,800
<i>Percent:</i>						
From Mexico	55%	59%	87%	57%	9%	21%
In the US 15+ years	35%	35%	45%	29%	29%	31%
Speak English well, very well, or only English	55%	47%	35%	43%	61%	55%
Unemployed	7%	5%	13%	10%	9%	6%
In poverty	28%	28%	44%	36%	29%	19%
Without health insurance	61%	73%	66%	63%	63%	61%
Less than high school	46%	51%	68%	64%	29%	31%
Some college or a degree	28%	23%	11%	11%	40%	33%
Access to computer or the internet	66%	61%	57%	52%	69%	75%

Source: Center for Migration Studies, based on data from the 2014 ACS.

II. Demographic Analysis of Fresno, CA

Figure A-1. Undocumented residents in the Fresno area, by PUMA:* 2014

Map created by staff at the Minnesota Population Center

Source: Center for Migration Studies, based on data collected in the American Community Survey.

* PUMAs are Census Bureau-defined areas that have 100,000 or more total population.

Table A-3. Demographic characteristics of undocumented immigrants in Fresno
(Numbers in thousands; parts might not sum to totals because of rounding)

Characteristic	Undocumented pop.		Top	Undocumented pop.		Top
	CA (1)	Fresno (2)	PUMA (3)	CA (4)	Fresno (5)	PUMA (6)
Total population	2,598	61	21	100%	100%	100%
<i>Area of origin</i>						
North America	1,771	53	19	68%	87%	91%
Asia	417	5	1	16%	8%	4%
Central America	309	2	1	12%	4%	5%
All other	101	-	-	4%	-	-
<i>Country of origin</i>						
Mexico	1,763	53	19	68%	87%	91%
India	86	2	1	3%	4%	3%
El Salvador	150	2	1	6%	3%	5%
Philippines	100	1	-	4%	2%	-
All other	499	3	-	19%	5%	1%
<i>Age</i>						
Under 18	246	5	2	9%	9%	8%
18 to 24	272	8	2	10%	13%	12%
25 to 44	1,473	36	12	57%	59%	56%
45 and over	607	12	5	23%	20%	24%
<i>Sex</i>						
Male	1,412	35	12	54%	57%	57%
Female	1,185	27	9	46%	43%	43%
<i>Years in the US</i>						
Less than 10 years	819	18	7	32%	29%	33%
10 to 19 years	1,064	24	6	41%	40%	31%
20 years or more	715	19	7	28%	31%	36%
<i>Marital status (age 15 and over)</i>						
Married to U.S. citizen	61	1	-	3%	2%	-
Married to legal noncitizen	275	7	2	11%	11%	11%
Married to undoc. resident	682	17	7	28%	29%	36%
All other	1,421	34	10	58%	58%	52%
<i>Parents of US citizens</i>						
Under age 21	903	27	11	35%	43%	51%
21 years and over	99	2	1	4%	4%	5%

Source: Center for Migration Studies, based on data from the 2014 ACS.

Table A-4. Social and economic characteristics of undocumented immigrants in Fresno
(Numbers in thousands; parts might not sum to totals because of rounding)

Characteristic	Undocumented			Undocumented pop.		
	CA (1)	Fresno (2)	Top PUMA (3)	CA (4)	Fresno (5)	Top PUMA (6)
Total population	2,598	61	21	100%	100%	100%
Ability to speak English (5 years and over)						
Little or no English	1,243	39	15	48%	65%	73%
Well, very well, or only English	1,326	21	5	52%	35%	27%
Language spoken at home (ages 5 and over)						
Spanish	2,035	53	19	79%	89%	92%
English	92	2	1	4%	3%	3%
Hindi	59	2	1	2%	4%	4%
All other	382	3	-	15%	5%	-
Educational attainment (ages 18 and over)						
Less than high school	1,165	38	14	50%	68%	75%
High school	559	11	3	24%	20%	16%
Some college or a degree	628	6	2	27%	11%	9%
Health insurance coverage						
With health insurance	1,168	21	8	45%	34%	40%
No health insurance	1,429	40	12	55%	66%	60%
Employment status (ages 16 and over)						
In the labor force	1,817	41	13	75%	72%	69%
Employed	1,686	36	12	70%	63%	62%
Unemployed	131	5	1	7%	13%	10%
Poverty status						
At or above poverty level	1,919	34	11	74%	56%	54%
Below poverty threshold	679	27	9	26%	44%	46%
Other characteristics						
Access to the internet	1,818	35	12	70%	57%	59%
Enrolled in school (ages 5+)	380	9	2	15%	14%	12%

Source: Center for Migration Studies, based on data from the 2014 ACS.

III. Demographic Analysis of Houston, TX

Figure A-2. Undocumented residents in Houston, by PUMA:* 2014

Map created by staff at the Minnesota Population Center

Houston

About 586,000 undocumented residents live in Houston. They comprise 39 percent of the 1.5 million foreign-born living in Houston, and 9 percent of Houston's total population. Eighty-three percent are from North and Central America. Leading countries: Mexico (347,000), El Salvador (70,000), Honduras (42,000), and Guatemala (27,000).

Sixty-three percent have been in the US for 10 years or more, 53 percent speak little or no English, 51 percent have less than a high school education, 73 percent have no health insurance, 28 percent have incomes below the poverty level, and just 4 percent are unemployed.

Leading industries: construction (105,000), restaurants and other food services (66,000), wholesale and retail trade (47,000), other services, such as private household workers (47,000), landscaping and building maintenance (43,000), and manufacturing (40,000).

Source: Center for Migration Studies, based on data from the American Community Survey.

* PUMAs are Census Bureau-defined areas that have 100,000 or more total residents.

Table A-5. Demographic characteristics of undocumented immigrants in Houston
(Numbers in thousands; parts might not sum to totals because of rounding)

Characteristic	Undocumented pop.		Rest of		Undocumented pop.		Rest of	
	Texas	Houston	Texas		Texas	Houston	Texas	
	(1)	(2)	(3)		(4)	(5)	(6)	
Total population	1,737	586	1,151		100%	100%	100%	
<i>Area of origin</i>								
North America	1,299	347	951		75%	59%	83%	
Central America	229	143	86		13%	24%	7%	
Asia	131	56	75		8%	10%	7%	
South America	33	20	13		2%	3%	1%	
All other	45	20	25		3%	3%	2%	
<i>Country of origin</i>								
Mexico	1,296	347	950		75%	59%	83%	
El Salvador	109	70	39		6%	12%	3%	
Honduras	69	42	27		4%	7%	2%	
Guatemala	42	27	15		2%	5%	1%	
All other	263	128	135		15%	22%	12%	
<i>Age</i>								
Under 18	181	55	125		10%	9%	11%	
18 to 24	223	78	145		13%	13%	13%	
25 to 44	962	332	631		55%	57%	55%	
45 and over	371	121	250		21%	21%	22%	
<i>Sex</i>								
Male	930	324	606		54%	55%	53%	
Female	806	262	544		46%	45%	47%	
<i>Years in the US</i>								
Less than 10 years	634	217	417		37%	37%	36%	
10 to 19 years	775	253	522		45%	43%	45%	
20 years or more	328	116	212		19%	20%	18%	
<i>Marital status (15 and over)</i>								
Married to US citizen	66	17	49		4%	3%	5%	
Married to legal noncitizen	149	47	102		9%	9%	9%	
Married to undoc. resident	532	180	352		33%	33%	33%	
All other	875	306	570		54%	56%	53%	
<i>Parents of US citizens</i>								
Children under age 21	661	209	452		38%	36%	39%	
Children 21 years and over	52	14	38		3%	2%	3%	

Source: Center for Migration Studies, based on data from the 2014 ACS.

Table A-6. Social and economic characteristics of undocumented immigrants in Houston
(Numbers in thousands; parts might not sum to totals because of rounding)

Characteristic	Undocumented pop.		Rest of Texas	Undocumented pop.		Rest of Texas
	Texas (1)	Houston (2)		Texas (4)	Houston (5)	
Total population	1,737	586	1,151	100%	100%	100%
<i>Ability to speak English (5 years and over)</i>						
Little or no English	914	306	608	53%	53%	53%
Well, very well, or only English	808	275	534	47%	47%	47%
<i>Language spoken at home (ages 5 and over)</i>						
Spanish	1,508	492	1,016	88%	85%	89%
English	52	21	31	3%	4%	3%
Hindi	31	13	18	2%	2%	2%
Chinese	18	10	8	1%	2%	1%
All other	114	45	69	7%	8%	6%
<i>Educational attainment (ages 18 and over)</i>						
Less than high school	825	271	554	53%	51%	54%
High school	395	138	257	25%	26%	25%
Some college or a degree	337	122	215	22%	23%	21%
<i>Health insurance coverage</i>						
With health insurance	488	156	332	28%	27%	29%
No health insurance	1,249	431	819	72%	73%	71%
<i>Employment status (ages 16 and over)</i>						
In the labor force	1,155	403	753	72%	74%	71%
Employed	1,092	383	709	68%	70%	67%
Unemployed	63	20	44	4%	4%	4%
<i>Poverty status</i>						
At or above poverty level	1,179	424	754	68%	72%	66%
Below poverty threshold	558	162	396	32%	28%	34%
<i>Other characteristics</i>						
Access to the internet	970	355	615	56%	61%	53%
Enrolled in school (ages 3+)	244	79	166	14%	13%	14%

Source: Center for Migration Studies, based on data from the 2014 ACS.

IV. Demographic Analysis of Nebraska

Figure A-3. Undocumented residents in Nebraska, by PUMA:* 2014

Map created by staff at the Minnesota Population Center

Nebraska

About 42,400 undocumented residents live in Nebraska. The undocumented population comprises 35 percent of the 120,000 foreign-born residents, and about 2 percent of the 1.9 million people who live in Nebraska. Mexico and Guatemala are the leading countries of origin; 24,000 are from Mexico, and 10,000 from Guatemala. 50 percent of the undocumented residents from each of those countries live in Omaha. About 55 percent of all undocumented residents in Nebraska have been in the US for 10 years or more.

The darkest shaded PUMA in the map above is located in the southern section of Omaha. It has the largest concentration of undocumented residents in the state, about 13,200, or 31 percent of the total. Lincoln (located in the two square PUMAS just southwest of Omaha) has about 5,600 undocumented residents. About 7,000 live in the PUMA in the center of the state, and 5,300 live in the northeast PUMA.

About 57 percent of the undocumented residents in Nebraska speak little or no English, 64 percent have less than a high school education, 63 percent have no health insurance, and 36 percent have incomes below the poverty level. About 10 percent are unemployed in the state, but Omaha has an unemployment rate of 17 percent.

Leading industries: construction (10,700), manufacturing (7,900**), services such as building maintenance, restaurants, food service, and travelers accommodations (6,200).

Source: Center for Migration Studies, based on data from the American Community Survey.

* PUMAs are Census Bureau-defined areas that have 100,000 or more total residents.

** 7,100 of those classified as working in manufacturing work in animal processing plants.

Table A-7. Demographic characteristics of undocumented immigrants in Nebraska
(Numbers in thousands; parts might not sum to totals because of rounding)

Characteristic	Undocumented population		Percent of total population	
	Nebraska (1)	Omaha (2)	Nebraska (3)	Omaha (4)
Total population	42	20	100%	100%
<i>Area of origin</i>				
North America	24	12	57%	62%
Central America	12	6	29%	29%
All other	6	2	14%	9%
<i>Country of origin</i>				
Mexico	24	12	57%	62%
Guatemala	10	5	23%	23%
El Salvador	2	1	4%	4%
All other	7	2	16%	11%
<i>Age</i>				
Under 18	6	3	14%	16%
18 to 24	4	3	10%	13%
25 to 44	26	12	62%	60%
45 and over	6	2	14%	11%
<i>Sex</i>				
Male	23	12	53%	58%
Female	20	8	47%	42%
<i>Years in the US</i>				
Less than 10 years	19	8	45%	42%
10 to 19 years	15	8	36%	38%
20 years or more	8	4	19%	21%
<i>Marital status (age 15 and over)</i>				
Married to US citizen	1	1	3%	5%
Married to legal noncitizen	3	1	8%	6%
Married to undoc. resident	14	5	36%	26%
All other	21	12	54%	63%
<i>Parents of US citizens</i>				
Under age 21	17	7	40%	36%
21 years and over	1	1	2%	4%

Source: Center for Migration Studies, based on data from the 2014 ACS.

Table A-8. Social and economic characteristics of undocumented immigrants in Nebraska
(Numbers in thousands; parts might not sum to totals because of rounding)

Characteristic	Undocumented population		Percent of total population	
	Nebraska (1)	Omaha (2)	Nebraska (3)	Omaha (4)
Total population	42	20	100%	100%
<i>Ability to speak English (5 years and over)</i>				
Little or no English	24	12	57%	59%
Well, very well, or only English	18	8	43%	41%
<i>Language spoken at home (ages 5 and over)</i>				
Spanish	36	18	86%	90%
All other	6	2	14%	10%
<i>Educational attainment (ages 18 and over)</i>				
Less than high school	23	12	64%	69%
High school	9	4	25%	22%
Some college or a degree	4	2	11%	10%
<i>Health insurance coverage</i>				
With health insurance	16	5	37%	27%
No health insurance	27	15	63%	73%
<i>Employment status (ages 16 and over)</i>				
In the labor force	29	13	77%	75%
Employed	26	11	69%	62%
Unemployed	3	2	10%	17%
<i>Poverty status</i>				
At or above poverty level	27	13	64%	64%
Below poverty threshold	15	7	36%	36%
<i>Other characteristics</i>				
Access to computer/internet	22	8	52%	42%
Enrolled in school	7	4	16%	19%

Source: Center for Migration Studies, based on data from the 2014 ACS.

V. Demographic Analysis of Queens, NY

Figure A-4. Undocumented residents in Queens, by PUMA:* 2014

Map created by staff at the Minnesota Population Center

Queens

About 224,000 undocumented residents live in Queens. They constitute 10 percent of the total population of 2.3 million, and 20 percent of the 1.1 million total foreign-born. Slightly more than half (54 percent) have been in the US 10 years or more.

Leading countries: Mexico (48,000), China (34,000), Ecuador (28,000), and South Korea (10,000). Six other countries have 5,000 or more undocumented residents.

In Queens, 55 percent speak English well, very well, or only English, 33 percent have some college or a degree, 39 percent have health insurance, 75 percent have access to the internet, 81 percent have incomes at or above the poverty level, and only 4 percent are unemployed.

Leading industries: restaurants and other food services (38,000), services such as private household workers and personal care (24,000), construction (20,000), health care and social assistance (18,000), and retail trade (16,000).

Source: Center for Migration Studies, based on data from the American Community Survey.

* PUMAs are Census Bureau-defined areas that have 100,000 or more total residents.

Table A-9. Demographic characteristics of undocumented immigrants in Queens
(Numbers in thousands; parts might not sum to totals because of rounding)

Characteristic	Undocumented pop.		Rest of	Undocumented pop.		Rest of
	NYC	Queens	NYC	NYC	Queens	NYC
	(1)	(2)	(3)	(4)	(5)	(6)
Total population	575	224	351	100%	100%	100%
<i>Area of origin</i>						
North America	124	74	50	22%	33%	14%
Central America	83	52	31	14%	23%	9%
Asia	140	48	92	24%	21%	26%
South America	118	22	96	21%	10%	27%
All other	110	28	81	19%	13%	23%
<i>Country of origin</i>						
Mexico	140	48	92	24%	21%	26%
Ecuador	45	28	17	8%	13%	5%
China	55	34	21	10%	15%	6%
Korea	14	10	4	2%	5%	1%
All other	321	104	217	56%	46%	62%
<i>Age</i>						
Under 18	59	18	40	10%	8%	11%
18 to 24	66	21	44	11%	10%	13%
25 to 44	309	121	188	54%	54%	54%
45 and over	141	63	78	25%	28%	22%
<i>Sex</i>						
Male	308	123	185	54%	55%	53%
Female	267	101	166	46%	45%	47%
<i>Years in the US</i>						
Less than 10 years	270	102	168	47%	46%	48%
10 to 19 years	202	83	119	35%	37%	34%
20 years or more	102	39	64	18%	17%	18%
<i>Marital status (15 and over)</i>						
Married to US citizen	3	1	2	1%	1%	1%
Married to legal noncitizen	50	23	28	9%	11%	9%
Married to undoc. resident	105	46	59	20%	22%	19%
All other	373	141	232	70%	67%	72%
<i>Parents of US citizens</i>						
Children under age 21	127	46	81	22%	20%	23%
Children 21 years and over	10	4	6	2%	2%	2%

Source: Center for Migration Studies, based on data from the 2014 ACS.

Table A-10. Social and economic characteristics of undocumented immigrants in Queens
(Numbers in thousands; parts might not sum to totals because of rounding)

Characteristic	Undocumented pop.		Rest of NYC	Undocumented pop.		Rest of NYC
	NYC (1)	Queens (2)		NYC (4)	Queens (5)	
Total population	575	224	351	100%	100%	100%
<i>Ability to speak English (5 years and over)</i>						
Little or no English	252	100	152	45%	45%	44%
Well, very well, or only English	312	121	191	55%	55%	56%
<i>Language spoken at home (ages 5 and over)</i>						
Spanish	288	102	186	51%	46%	54%
Chinese	58	35	23	10%	16%	7%
English	84	29	55	15%	13%	16%
Hindi	29	17	12	5%	8%	3%
All other	105	37	68	19%	17%	20%
<i>Educational attainment (ages 18 and over)</i>						
Less than high school	177	64	113	34%	31%	36%
High school	166	74	92	32%	36%	30%
Some college or a degree	174	67	106	34%	33%	34%
<i>Health insurance coverage</i>						
With health insurance	255	87	168	44%	39%	48%
No health insurance	320	137	183	56%	61%	52%
<i>Employment status (ages 16 and over)</i>						
In the labor force	409	164	245	78%	78%	77%
Employed	380	155	225	72%	74%	71%
Unemployed	29	9	20	5%	4%	6%
<i>Poverty status</i>						
At or above poverty level	434	182	252	76%	81%	72%
Below poverty threshold	140	42	99	24%	19%	28%
<i>Other characteristics</i>						
Access to the internet	416	167	249	72%	75%	71%
Enrolled in school (ages 3+)	84	29	54	15%	13%	16%

Source: Center for Migration Studies, based on data from the 2014 ACS.

Appendix G: Regional Collaboration Map and Activity Chart

Regional Collaboration Efforts for Effective Implementation across the U.S. – Map and Activity Chart

Regional coordination exists when there is intentional partnership and engagement across organizations and sectors in effort to enhance capacity and structure for effective implementation of administrative relief, immigration services and preparing for eventual immigration reform. Organizations and funding collaborates across the country have been building regional coordination tables and partnerships which serve as models for organizations that are new to this effort. Below is a map of where the Regional Training Team of the Committee for Immigration Reform Implementation (CIRI) has identified regional collaboration efforts through conversation with organizations. **Black** stars are the “Regional Coordination Collaboratives” and **blue** stars are “Regional Funding Collaboratives” which are explained in the activity chart.

ADMINISTRATIVE
RELIEF
RESOURCE CENTER

If your collaborative is not currently on the map and you would like for it to be included, please email Sarah Mesick, NPNA, at sarah@partnershipfornewamericans.org
For more information visit: www.adminrelief.org

Below is the list of the Regional Collaboration efforts separated into “Regional Coordination Collaboratives” and “Regional Funding Collaboratives”. The Regional Coordination Collaboratives are those that bring a broad range of partners together to form a contingency and coordination plan for a full implementation launch; and, often times expand their focus into other immigration service and organizing areas. The Regional Funding Collaboratives listed below are pulled together by Grantmakers Concerned with Immigrants and Refugees (GCIR) which operates by bringing funders together to learn about current immigration issues, connect with other funders and partners, and collaborate with grant making colleagues on strategies for immigrant-related funding locally, regionally, and nationally.

Regional Coordination Collaboratives

State	Name of the Regional Coordination Collaborative	Demographics	Lead Partners	Structure and communication	Website and contact information
West Coast Region					
California	Ready California	<p>Total Admin Relief (DAPA / DACA+): 1,523,000</p> <p>DACA 2012: 343,000</p> <p>DACA 2012 + 2014 program rules (DACA +): 436,000</p> <p>DAPA: 1,087,000</p> <p>Total Undocumented population: 3,034,000</p>	<p>Program and Fiscal Lead: Immigrant Legal Resource Center</p>	<p>Ready California is a cross-sector collaborative working to ensure that the maximum number of eligible Californians benefit from DACA and DAPA while strengthening the statewide infrastructure to respond to future immigration reform. The state is divided up into regions, has state-level trainings, meetings and materials. There is a website and listserv for partners, works on state-level</p>	<p>Website: http://ready-california.org/for-service-providers/</p> <p>Sara Feldman, Ready California Project Director, sfeldman@ilrc.org</p>

Oregon	Portland Ready	<p>Total Admin Relief (DAPA / DACA+): 59,000</p> <p>DACA 2012: 13,000</p> <p>DACA 2012 + 2014 program rules (DACA +): 15,000</p> <p>DAPA: 44,000</p> <p>Total Undocumented population: 115,000</p>	CAUSA, along with Unions, local gov't, non-profit legal service providers and legal service providers	<p>This group began in January 2015 to have a more coordinated approach to outreach and workshops around admin relief. The group meets once per month, has collaborated to put together a website with information and listing of events, and have concrete projects to move together on. During the delay, they have worked together to respond to the raids, and collectively moved a petition against the raids to deliver to ICE. This group has an active email list and open to new partners.</p>	<p>advocacy, and re-grants to regions for education, outreach, application assistance and legal services.</p>	<p>Website: http://oregonimmigrationresource.org</p> <p>Yuri Hernandez, CAUSA Admin Relief and Volunteer Coordinator, yuri@causaoregon.org</p>
Midwest Region						
Illinois	Illinois is Ready!	<p>Total Admin Relief (DAPA / DACA+): 261,000</p> <p>DACA 2012: 64,000</p>	<p>Illinois Coalition for Immigrant and Refugee Rights (ICIRR) members, DePaul</p>	<p>IL is Ready meets monthly with partners to share the updates on admin relief, the work happening in the field, and identify points of collaboration for</p>	<p>Website: http://www.ilisready.org/</p> <p>Breadan Magee, Senior Director of Programs, ICIRR, bmagee@icirr.org</p> <p>Luis Huerta-Silva, Admin Relief Coordinator, ICIRR: lh-silva@icirr.org</p>	

		<p>DACA 2012 + 2014 program rules (DACA +): 78,000</p> <p>DAPA: 183,000</p> <p>Total Undocumented Population: 519,000</p>	<p>University, Attorney General Lisa Madigan's Office, Chicago Mayor's Office of New Americans, Mexican Consulate, Cong. Mike Quigley, Cong. Tammy Duckworth, and State Rep. Lisa Hernandez</p>	<p>implementation efforts and strategy. Through integration of immigrant services like citizenship, Know Your Rights, and DACA/DAPA, the group is better equipped to identify points of collaboration and continue community member engagement. The group has an email list to communicate upcoming meetings and admin relief updates.</p>		
Michigan	Ready Michigan	<p>Total Admin Relief (DAPA /DACA+): 44,000</p> <p>DACA 2012: 9,000</p> <p>DACA 2012 + 2014 program rules (DACA +): 11,000</p> <p>DAPA: 33,000</p> <p>Total Undocumented Population: 97,000</p>	<p>Michigan (MI) United, MI Immigrant Rights Center (MIRC)</p>	<p>The group has begun collaborating and performing outreach.</p>	<p>Partner websites: http://www.michiganimmigrant.org, http://www.miunited.org</p> <p>Diego Bonesatti, MI United - diego@miunited.org</p> <p>Ruby Robinson; MI Immigrant Rights Center, rubyr@michiganimmigrant.org</p> <p>Susan Reed, susanree@michiganimmigrant.org MIRC's managing attorney</p> <p>Ryan Bates, ryan@miunited.org, Michigan United's Executive Director</p>	

Indiana	Michiana Immigration Coalition	<p>Total Admin Relief (DAPA / DACA+): 43,000</p> <p>DACA 2012: 9,000</p> <p>DACA 2012 + 2014 program rules (DACA +): 11,000</p> <p>DAPA: 32,000</p> <p>Total Undocumented Population: 93,000</p>	<p>La Casa de Amistad, Center for Legal Justice, National Immigrant Justice Center (NIJC), Goshen College, Catholic Charities, Mennonite Central Committee, La Proteus, La Casa Inc, El Puente</p>	<p>The Michiana Immigration Coalition educates and empowers immigrants in the northern Indiana and southwestern Michigan region known as Michiana. It meets monthly and has an email list.</p>	<p>Website: https://immigrantjustice.org/michianaimmigrationcoalition Lisa Koop, NIJC Associate Director of Legal Services, LKoop@heartlandalliance.org </p>
Wisconsin	Not formally named	<p>Total Admin Relief (DAPA / DACA+): 76,000</p> <p>DACA 2012: 9,000</p> <p>DACA 2012 + 2014 program rules (DACA +): 11,000</p> <p>DAPA: 24,000</p> <p>Total Undocumented Population: 76,000</p>	<p>Catholic Charities of Diocese of La Crosse</p>	<p>Catholic Charities of the Diocese of La Crosse assists people with immigration legal consultations, and legally represent people filing immigration applications and petitions. This is an affiliate of the Catholic Legal Immigration Network, and has several relationships with area agencies, centers, and churches serving immigrants with or without status.</p>	<p>John David, Attorney for Catholic Charities of the Diocese of La Crosse, jdavid@cclse.org http://cclse.org/immigration/ </p>

Missouri	Kansas City Metro Immigration Alliance (includes KC, KS) The Immigrant Service Providers Network (ISP) - Missouri Immigrant & Refugee Advocates (MIRA) - St. Louis, MO	Missouri: Total Admin Relief (DAPA / DACA+): 25,000 DACA 2012: 6,000 DACA 2012 + 2014 program rules (DACA +): 7,000 DAPA: 18,000 Total Undocumented Population: 57,000	KC MIA is a roundtable comprised of members representing organizations in the non-profit, legal, medical and corporate ISP - MIRA- aims to support the foreign born and their families by coordinating efforts to increase the capacity of community resources, advocate for inclusive policy and services, and educate	They serve all 19 counties in the Diocese of La Crosse, as well as agreements to serve the counties in the Diocese of Winona in Minnesota, and the Diocese of Superior in Wisconsin.	KC MIA Resources shared via the Facebook page: http://bit.ly/KC-MIA KC MIA - Jessica Piedra, jessica@jpiedralaw.com ISP - MIRA - for more information: 314.669.1288 MIRA - www.mira-mo.org
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			residents and providers in the St Louis region	which are much more difficult to resolve. ISPN MIRA - Meetings are recurring, and are held the fourth Wednesday of each month from 9:00 am to 10:30 am. The meetings are held at 2725 Clifton Ave. 63139. Membership is informal, and is defined by attending the Networks Meetings. There are no membership dues, and the group is open to any organization that serves immigrants and refugees.	
East Coast					
New York	New York Ready4Relief New York City's Action NYC	New York Total Admin Relief (DAPA / DACA+): 330,000 DACA 2012: 76,000 DACA 2012 + 2014 program rules (DACA +): 99,000 DAPA: 231,000	New York Immigration Coalition, NYC Mayor's Office of Immigrant Affairs (MOIA), New York State Office for New Americans (ONA)	NYIC leads the readiness preparation for New York state working with different configurations of partners, including community-led and driven initiatives, regional tables or networks, and government funded programs.	Camille Mackler, NYIC's Director of Legal Initiatives, cmackler@nyic.org Karen Yau, NYIC's Director of Outreach and Capacity Building kyau@nyic.org Website: http://www.thenyic.org Maribel Hernández Rivera, Executive Director of Legal Initiatives, New York City Mayor's Office of Immigrant Affairs, mhernandezrivera@moia.nyc.gov Website: http://www.nyc.gov/html/imm/html/home/home.shtml

		Total Undocumented population: 867,000		<p>The New York State Office for New Americans has created a network of 27 Opportunity Centers housed in community based organizations throughout the state that will focus on outreach, information sessions, and application assistance, as well as capacity building through BIA R&A trainings</p> <p>Action NYC is the Nation's largest municipal investment to prepare for executive action and in response to the need for comprehensive immigration reform</p>	<p>Laura Gonzalez-Murphy, New York State Office for New Americans (ONA) Director, Laura.GonzalezMurphy@dos.ny.gov, Jorge Montalvo, Deputy Secretary of State for Economic Opportunity NY ONA, jorge.montalvo@dos.ny.gov Website: http://www.newamericans.ny.gov</p>	
Pennsylvania	Pennsylvania is Ready!	<p>Total Admin Relief (DAPA / DACA+): 51,000</p> <p>DACA 2012: 15,000</p> <p>DACA 2012 + 2014 program rules (DACA +): 19,000</p> <p>DAPA: 32,000</p>	<p>Pennsylvania Immigration and Citizenship Coalition (PICC), AFRICOM, Casa de la Cultura, Casa San Jose, CATA the Farmworkers' Support</p>	<p>PA is READY! is a coalition of organizations across Pennsylvania that is working to ensure that Pennsylvania immigrant community members get the information and assistance they need to apply for administrative relief.</p>	<p>Website: http://www.paimmigrant.org</p> <p>Judy Kim, PA Project Coordinator, judykim@paimmigrant.org</p>	

DC / Maryland / Virginia	DMV DAPA Collaborative (DMV=DC/MD/VA)	Total Undocumented population: 136,000	Committee, Community Justice Project, Church World Service, Esperanza Immigration Legal Services, partner members in Pittsburgh.	The service model is a three step approach around engagement 1) information sessions, 2) screening and 3) provide legal services. Goal is to reach underserved immigrant communities in PA.	Edgar Aranda-Yanoc, LLM Chair, Virginia Coalition of Latino Organizations (VACOLAO) Organizing Coordinator, Legal Aid Justice Center's Immigrant Advocacy Program edgar@justice4all.org Kathryn M. Doan Executive Director Capital Area Immigrants' Rights (CAIR) Coalition kathy.doan@caircoalition.org
		DC / MD / VA respectively: Total Admin Relief (DAPA / DACA+): 7,000 / 81,000 / 70,000 DACA 2012: 2,000 / 20,000 / 25,000 DACA 2012 + 2014 program rules (DACA +): 3,000 / 25,000 / 29,000 DAPA: 4,000 / 56,000 / 61,000 Total Undocumented population:	Catholic Charities of the Archdiocese of Washington, CARECEN, Capital Area Immigrants' Rights Coalition, VACOLAO (Virginia Coalition of Latino Organizations), Legal Aid Justice Center, Commission on Immigration of the	Monthly Steering Committee meetings, quarterly collaborative meetings, online calendar for sharing DAPA-related events	

		25,000 / 233,000 / 247,000	American Bar Association and the law firm Steptoe & Johnson		
Southern Region					
Nebraska	NILAH (Nebraska Immigration Legal Assistance Hotline) Collaborative (directors of all groups)	Total Admin Relief (DAPA / DACA+): 18,000 DACA 2012: 3,000 DACA 2012 + 2014 program rules (DACA +): 4,000 DAPA: 14,000 Total Undocumented population: 37,000	Catholic Charities of the Archdiocese of Omaha, Center for Legal Immigration Assistance, Justice For Our Neighbors of Nebraska, Legal Aid of Nebraska, Lutheran Family Services of Nebraska, Nebraska Appleseed, and Women's Center for Advancement	Hotline with 5 orgs - intake process, (2 people answering phones for state). There are multiple committees including the Implementation committee). Orgs use the same intake. Whoever has room/space will take case. Working on this for 5 years (but implementation for past 2 years).	Website - http://www.nilah.org All NILAH members are main contact for specific areas of work

Oklahoma	No formal collaborative more information needed	Oklahoma: Total Admin Relief (DAPA / DACA+): 37,000 DACA 2012: 8,000 DACA 2012 + 2014 program rules (DACA +): 9,000 DAPA: 28,000 Total Undocumented population: 80,000	Dream Act Oklahoma, Catholic Charities, Oklahoma City Public School, Aspiring Americans, Mexican Consulate	The groups share each other's events and meetings that take place. The group does not meet regularly and does not have a listserv.	More information being gathered
Southwest Region					
New Mexico	Listo Nuevo Mexico (Ready New Mexico)	Total Admin Relief (DAPA / DACA+): 36,000 DACA 2012: 8,000 DACA 2012 + 2014 program rules (DACA +): 10,000 DAPA: 26,000 Total Undocumented population: 70,000	ListoNM is comprised of: El CENTRO de Igualdad y Derechos, NM DREAM Team, NM Immigrant Law Center, Encuentro, Center for Civic Policy (CCP)	The Listo Nuevo México Campaign is a network of organizations and individuals dedicated to the full integration of immigrants in New Mexico by ensuring low-income immigrants access to social and legal services to obtain Administrative Relief, fostering leadership development in our communities and promoting economic and civic engagement.	Website: http://listonm.org Rachel Lazar, Executive Director , El Centro de Igualdad y Derechos, rlazar_elcentro@yahoo.com

				Main focus= Bernalillo County	
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Regional Funding Collaboratives

Below is the list of regional funding collaboratives from the Delivering on the Dream (DOTD) initiative pulled together by Grantmakers Concerned with Immigrants and Refugees (GCIR). Delivering on the Dream (DOTD) is a national initiative currently comprised of 14 funding collaboratives in 11 states. Each DOTD collaborative operates in a unique local context with different policy, service delivery, and partnership challenges and opportunities. Through streamlined efforts, DOTD leverages local funding with national match dollars and advances administrative relief implementation through outreach and education, legal services, and capacity building in the field. For more information, please contact Cresa Pugh, DOTD Project Coordinator at cresa@gcir.org, and visit GCIR's website [here](http://gcir.org).

State	Name of the Regional Funding Collaborative and Launch Date	Demographics	Coordinators and Fiscal Sponsors
Midwest Region			
Illinois	Illinois Immigrant Funders Collaborative (IFC) Launched 2012	Total Admin Relief (DAPA / DACA+): 261,000 DACA 2012: 64,000 DACA 2012 + 2014 program rules (DACA +): 78,000 DAPA: 183,000 Total Undocumented Population: 519,000	Chicago Community Trust
Missouri	Greater Kansas City Delivering on the Dream Collaborative (working title) Launched 2016	Missouri: Total Admin Relief (DAPA / DACA+): 25,000 DACA 2012: 6,000 DACA 2012 + 2014 program rules (DACA +): 7,000 DAPA: 18,000 Total Undocumented Population: 57,000	Greater Kansas City Community Foundation

Tennessee	Tennessee Delivering on the Dream Collaborative Launched 2013	Total Admin Relief (DAPA / DACA+): 49,000 DACA 2012: 11,000 DACA 2012 + 2014 program rules (DACA +): 13,000 DAPA: 36,000 Total Undocumented population: 119,000	Tennessee Immigrant and Refugee Rights Coalition
East Coast Region			
New York	The Fund for New Citizens in the New York Community Trust Launched 1987 (DACA related grant making began in 2013)	Total Admin Relief (DAPA / DACA+): 330,000 DACA 2012: 76,000 DACA 2012 + 2014 program rules (DACA +): 99,000 DAPA: 231,000 Total Undocumented population: 867,000	The New York Community Trust
Connecticut	The Immigrant Strategic Funders Collaborative for Connecticut Launched 2016	Total Admin Relief (DAPA / DACA+): 40,000 DACA 2012: 11,000 DACA 2012 + 2014 program rules (DACA +): 14,000 DAPA: 26,000 Total Undocumented population: 108,000	Community Foundation for Greater New Haven

North Carolina	North Carolina Funders' Collaborative for Strong Latino Communities Launched 2002 (DACA-related grant making began in 2013)	Total Admin Relief (DAPA / DACA+): 152,000 DACA 2012: 33,000 DACA 2012 + 2014 program rules (DACA +): 38,000 DAPA: 114,000 Total Undocumented population: 342,000	TBD
Pennsylvania	Pennsylvania Immigration and Citizenship Coalition	Total Admin Relief (DAPA/DACA+): 51,000 DACA 2012: 15,000 DACA 2012 + 2014 program rules (DACA +): 19,000 DAPA: 32,000 Total Undocumented population: 158,000	PA is Ready!
South / Southwest Region			
Houston, Texas	HILSC Houston Immigration Legal Services Collaborative Launched 2013	Greater Houston Total Admin Relief (DAPA / DACA+): 219,000	Houston Immigration Legal Services Collaborative (HILSC)
Texas (Statewide)	The Texas Access to Justice (TAJF) DOTD Collaborative Launched 2013	Total Admin Relief (DAPA / DACA+): 746,000 DACA 2012: 154,000 DACA 2012 + 2014 program rules (DACA +): 187,000 DAPA: 559,000 Total Undocumented population: 1,464,000	Texas Access to Justice Foundation

Arkansas	Delivering on the Dream Launched 2014	Total Admin Relief (DAPA / DACA+): 28,000 DACA 2012: 6,000 DACA 2012 + 2014 program rules (DACA +): 8,000 DAPA: 20,000 Total Undocumented population: 54,000	Winthrop Rockefeller Foundation, Arkansas Community Foundation
Colorado	Colorado Delivering on the Dream Collaborative (working on the title) Launched 2015	Total Admin Relief (DAPA / DACA+): 84,000 DACA 2012: 19,000 DACA 2012 + 2014 program rules (DACA +): 22,000 DAPA: 62,000 Total Undocumented population: 164,000	Latino Community Foundation of Colorado, an initiative of the Rose Community Foundation
West Coast Region			
Greater San Francisco Bay Area, California	Ready Bay Area Launched 2012	Total Admin Relief (DAPA / DACA+) in the 9 counties covered: 222,000	Ready Bay Area
Los Angeles, California	California Community Foundation (CCF) New Americans Opportunity Fund Launched 2012	Los Angeles County Total Admin Relief (DAPA / DACA+): 511,000	California Community Foundation (CCF)
Orange County, California	The Orange County Opportunity Fund: Delivering on the Dream for New Americans Launched 2015	Orange County Total Admin Relief (DAPA / DACA+): 141,000	The OC Opportunity Fund
Oregon	Oregon Funders Collaborative for Deferred Action Launched 2012	Total Admin Relief (DAPA / DACA+): 59,000 DACA 2012: 13,000	Oregon Community Foundation

		DACA 2012 + 2014 program rules (DACA +): 15,000 DAPA: 44,000 Total Undocumented population: 115,000	
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* - Regional Demographics for Admin Relief provided by [Migration Policy Institute's "Unauthorized Immigrant Population Profiles"](#) Report

This "Regional Collaboration Efforts for Effective Implementation across the U.S. Map and Activity Chart" was put together by the [Committee for Immigration Reform Implementation's \(CIRI\)](#) Regional Training Team to assist in supporting regional collaboration efforts across the country. For more information, please contact Sarah Mesick, Outreach and Training Coordinator at the National Partnership for New Americans (NPNA) and National Coordinator of the CIRI Regional Training Team, at sarah@partnershipfornewamericans.org.

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