



Immigrants and WIOA Services

Comparison of Sociodemographic Characteristics of Native- and Foreign-Born Adults in Colorado

By Margie McHugh and Madeleine Morawski

This fact sheet provides a profile of key characteristics of foreign-born and native-born residents of the state of Colorado that are relevant to understanding needs for adult education and workforce training services. It is part of a larger series of state and county fact sheets produced by the Migration Policy Institute's (MPI) National Center on Immigrant Integration Policy to support equitable implementation of the *Workforce Innovation and Opportunity Act* (WIOA), as well as consideration of other policy and funding initiatives to promote the successful linguistic, economic, and civic integration of immigrants and refugees who have settled in the United States.

The estimates provided are based on MPI analysis of U.S. Census Bureau American Community Survey (ACS) data pooled over the 2009-13 period in order to provide the most detailed sociodemographic portrait possible of residents' characteristics. Mirroring the design of federal adult education and workforce training program rules, data are provided for those ages 16 and over.

1) Nativity, Age, and Origin of Colorado Residents

As of 2009-13, Colorado was home to more than 4 million residents ages 16 and older; 464,000 of whom, or 12 percent, were foreign born. Relatively fewer of Colorado's foreign-born individuals are ages 16-18 or ages 19-24 as compared to its native-born residents; rather, they are more likely to be in their prime working years, with 73 percent falling in the 25-to-44 and 45-to-59 age bands (compared to 61 percent of those who are native born). Of particular note are the 49 percent of foreign-born individuals who are 25 to 44 years old, a group that will continue to play a key role in the state's labor force for several decades to come.

More than half (55 percent) of the state's immigrant residents ages 16 and over hail from Latin America; 21 percent are of Asian origin—lower than the 28 percent share nationally; and 15 percent are European, slightly higher than the national share of 13 percent.

Relevance for WIOA Implementation: Provisions of WIOA's Title I address the country's three primary workforce training programs (youth, adult, and dislocated worker), target sub-populations within them (e.g. out-of-school youth ages 16 to 24), and the nature of services to be provided through them. Title II of the law—Adult Education and Literacy (commonly referred to as the *Adult Education and Family Literacy Act*, or AEFLA)—provides the national framework for services designed to build the basic skills of adults who lack a high school diploma or equivalent or who are Limited English Proficient (LEP). States and localities must ensure that eligible populations are given equitable access to information and services provided under the law in order not to run afoul of federal civil-rights and antidiscrimination

Table 1. Age, Gender, and Origin of the Colorado Population (ages 16 and older), by Nativity, 2009-13

	Total		Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent	
Total population ages 16 and over	4,030,000	3,565,000	100%	464,000	100%	
Age Groups						
16 to 18	206,000	191,000	5%	15,000	3%	
19 to 24	428,000	387,000	11%	41,000	9%	
25 to 44	1,463,000	1,234,000	35%	229,000	49%	
45 to 59	1,066,000	954,000	27%	111,000	24%	
60 and over	867,000	798,000	22%	69,000	15%	
Gender						
Female	2,017,000	1,784,000	50%	233,000	50%	
Regions of Birth (excluding birth at sea and unspecified countries)						
Africa	X	X	X	25,000	5%	
Asia	X	X	X	97,000	21%	
Europe	X	X	X	68,000	15%	
Latin America	X	X	X	257,000	55%	
Northern America	X	X	X	14,000	3%	
Oceania	X	X	X	3,000	1%	

Notes: Latin America includes South America, Central America, Mexico, and the Caribbean; Northern America includes Canada, Bermuda, Greenland, and St. Pierre and Miquelon. All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: Migration Policy Institute (MPI) analysis of U.S. Census Bureau data from the pooled 2009-13 American Community Survey (ACS).

provisions. This includes, for example, ensuring that language barriers do not impede access to information and services provided by American Job Centers (formerly known as One-Stop Career Centers) through which states and localities organize local access to WIOA-funded services. Given the size of its foreign-born population (and their range of educational backgrounds and levels of English proficiency—as described below), those engaged in implementing WIOA in Colorado face complex challenges in ensuring that the state’s diverse immigrant and refugee populations have equitable access to services provided under the law.

2) Educational Attainment

Foreign-born young adults represent only

7 percent of the state’s 16-to-18-year-old population; however, they comprise 16 percent of the state’s out-of-school youth in this age range, and are more than twice as likely as their native-born peers to lack a high school diploma or equivalent (HSD/E) and not be enrolled in school. Similarly, immigrant young adults are 10 percent of the state’s 19-to-24-year-olds but are more than three times as likely as native-born peers to lack a high school diploma or equivalent (HSD/E), comprising more than a quarter of state residents in this age range who have not obtained a HSD/E. Further, foreign-born young adults who lack a HSD/E are less likely than their native-born peers to be enrolled in school (10 percent versus 17 percent). Finally, among those not enrolled in school, foreign-born young adults are far more likely than the native born to be working (53 percent versus 41 percent).

Foreign-born individuals account for 12 percent of Colorado residents ages 25 and older; they are nearly six times more likely than native-born peers to lack a HSD/E, accounting for 43 percent of adults in this age group who have not completed high school. At the other end of the education spectrum, a quarter of foreign-born individuals 25 and over hold a bachelor's degree or higher as compared to 39 percent of those who are native born.

Relevance for WIOA Implementation: Out-of-school youth are a primary focus of WIOA's Title I workforce services, and adults who lack a HSD/E are targets for both Title I and Title II services. Given that foreign-born individuals are significantly over-represented among those with no HSD/E in the three age bands, services created with these funds should be targeted in equitable measure to meet their needs. This

will represent a shift for local systems that heretofore have not prioritized those with basic skills needs (whether native- or foreign born) for workforce training services, and/or whose service design is largely sequential—i.e. expecting adults to complete basic skills requirements before gaining access to workforce training programs. At the same time, provisions in the law that promote the use of career pathway service designs for serving WIOA clients pose significant capacity-building challenges for the state, given the difficulties many such pathway programs face in equitably serving adults with basic skills needs.¹ Integrated education and training models must also comply with immigration status restrictions placed on Title I-funded programs.² However, while those who lack work authorization are not eligible for WIOA-funded workforce services, all refugees and the majority of Colorado immigrants legally reside in the

Table 2. Educational Attainment of Colorado Residents (ages 16 and older), by Nativity, 2009-13

Educational Attainment	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Population ages 16 to 18	206,000	191,000	100%	15,000	100%
Not enrolled and no high school diploma or equivalent	9,000	8,000	4%	2,000	10%
Population ages 19 to 24	428,000	387,000	100%	41,000	100%
With at least high school diploma or equivalent	381,000	352,000	91%	29,000	71%
Without high school diploma or equivalent	46,000	35,000	9%	12,000	29%
Enrolled in school	7,000	6,000	17%	1,000	10%
Not enrolled in school and not employed	19,000	15,000	42%	4,000	36%
Not enrolled in school and employed	20,000	14,000	41%	6,000	53%
Population ages 25 and older	3,396,000	2,987,000	100%	409,000	100%
Less than high school diploma or equivalent	337,000	194,000	6%	144,000	35%
High school diploma or equivalent	752,000	664,000	22%	88,000	22%
Some college or associate's degree	1,052,000	976,000	33%	76,000	19%
Bachelor's, graduate, or professional degree	1,254,000	1,153,000	39%	101,000	25%
Foreign college-educated	X	X	X	56,000	56%

Note: All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

United States and are therefore eligible for Title I as well as Title II services, which are not subject to immigration status restrictions.³

Finally, the analysis also shows that immigrants under age 25 who lack a HSD/E are far more likely than their native-born counterparts to be employed and not enrolled in school. This points to a need for education and training services designed for “nontraditional” students—i.e., in addition to using appropriate instructional designs, programs should anticipate the needs of part-time students, the demands of their work schedules, and transportation issues or other constraints they may face in attending and completing more traditionally structured programs.

3) Limited English Proficiency and Educational Attainment

Estimates of limited English proficiency among Colorado residents are provided below given the relevance of LEP status⁴ for access to WIOA-funded services—e.g., English Language Acquisition services (formerly known as English-as-a-Second-Language or ESL) are a key element of AEFLA services, while adult English learners meet the “priority” definition for adult workforce services.⁵ Table 3 also provides individuals’ LEP status crossed with levels of educational attainment, in order to inform the efforts of state and local planners to provide education and training services that equitably meet the needs of LEP individuals with different levels of formal education.

Foreign-born individuals account for 86 percent of LEP residents in Colorado, who number 283,000 total. Among all LEP individuals ages 19 to 24 and ages 25 and older, 139,000 lack a HSD/E, indicating that 36 percent of the state’s approximately 384,000 low-educated adults are also LEP. Significant numbers of LEP individuals also have high levels of underlying education, including 61,000 native- and foreign-born individuals ages 25 and older

who have earned a high school diploma or equivalent, and an additional 63,000 who have either completed some college or an associate’s degree or who have earned a bachelor’s degree or higher.

Relevance for WIOA Implementation:

Colorado’s large populations of LEP and low-educated individuals are eligible for AEFLA services, which in recent years met only about 4 percent of need nationally.⁶ The state faces complex challenges in equitably reflecting the significant and wide range of LEP learner needs and goals in its Combined State Plan that will govern WIOA service provision in Colorado and that the U.S. Secretaries of Labor and Education must ultimately approve. For one, the state’s LEP residents include those who need AEFLA services but may not seek to achieve the employment or postsecondary transition and completion goals that are the primary focus of the law’s narrow accountability measures. This group of individuals may include, for example, those seeking only citizenship preparation services and immigrant mothers of young children seeking literacy and other programming that will help them support their children’s kindergarten readiness.

In addition, the law’s significant new emphasis on postsecondary training is likely to pose major challenges for local systems that in the past provided ESL and workforce training services separately and/or served few low-skilled or LEP individuals in Title I programs. While new provisions in WIOA do target workforce services to these basic skills-deficient individuals, the record of career pathway models and other training programs in providing equitable access to individuals who are low-educated and/or LEP is very weak. This is an especially urgent concern in Colorado where, for example, only 0.9 percent of those exiting from Title I adult intensive or training services in the 2014-15 program year were LEP.⁷

Stakeholders in WIOA’s implementation therefore face challenges in ensuring that local service plans and the state’s Combined Plan provide both the range of AEFLA services envi-

sioned under the law and equitable access to Title I-funded services for low-educated and/or LEP individuals who are work authorized. Significant policy, planning, and capacity-building efforts will be needed as the state and its localities take steps to address their obligation to provide equitable access to Title I-funded programs for those who are LEP and lack a HSD/E, as well as the significant number of LEP individuals who already possess a high school diploma or higher and are therefore positioned to directly access postsecondary-level training programs.

4) Brain Waste

“Brain waste”—the phrase used to describe when individuals with four-year college degrees or higher work in low-skilled jobs or are unemployed—is a particular concern for foreign-educated immigrants given the unique barriers they often face in attempting to transfer their education, training, and work experience to the U.S. labor market.⁸ More than half (56 percent) of Colorado’s foreign-born individuals who possess a college degree or higher were educated abroad (see Table 2),

Table 3. Limited English Proficiency and Educational Attainment of Colorado Residents (ages 16 and older), by Nativity, 2009-13

LEP Population by Educational Attainment	Total	Native Born		Foreign Born	
	Number	Number	Percent Native Born	Number	Percent Foreign Born
Total LEP population	283,000	41,000	14%	242,000	86%
	Number	Number	Percent	Number	Percent
LEP population ages 16 to 18	6,000	3,000	100%	4,000	24%
Not enrolled and no high school diploma or equivalent	-	-	-	-	-
LEP population ages 19 to 24	22,000	4,000	100%	17,000	100%
With at least high school diploma or equivalent	13,000	3,000	74%	10,000	55%
Without high school diploma or equivalent	9,000	-	-	8,000	45%
Enrolled in school	-	-	-	-	-
Not enrolled in school and not employed	3,000	-	-	3,000	36%
Not enrolled in school and employed	5,000	-	-	4,000	58%
LEP population ages 25 and older	255,000	33,000	100%	221,000	100%
Less than high school diploma	130,000	11,000	33%	119,000	54%
High school diploma or equivalent	61,000	9,000	25%	53,000	24%
Some college or associate’s degree	34,000	7,000	21%	27,000	12%
Bachelor’s, graduate, or professional degree	29,000	7,000	21%	23,000	10%

Notes: Limited English Proficient (LEP) refers to any person age 5 and older who reported speaking English less than “very well” as classified by the U.S. Census Bureau. All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

Table 4. Brain Waste among Colorado Residents (ages 25 and older), by Nativity, 2009-13

Brain Waste	Native Born		Foreign Born	
	Number	Percent	Number	Percent
Total civilian, college-educated labor force	885,000	100%	77,000	100%
Underutilized (i.e., in low-skilled jobs or unemployed)	176,000	20%	20,000	25%

Note: All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

indicating a significant share of the state’s highly educated immigrants and refugees is at risk for brain waste.

Data provided in Table 3 point to one of the most significant factors responsible for brain waste—limited English proficiency. Among foreign-born LEP individuals ages 25 and older, 23,000 (10 percent) have completed a bachelor’s degree or higher. Few adult education programs currently provide instruction that can help these individuals acquire the academic or professional-level English that will allow them to fully apply their education and training in the U.S. labor market.

In addition to difficulties accessing professional-level English classes, other factors that can contribute to brain waste include lack of recognition by employers or licensing bodies of academic or professional qualifications obtained abroad, difficulties in filling gaps in education or gaining U.S. work experience, steep and expensive barriers to gaining professional licenses, and/or poor understanding of U.S. job search norms. Table 4 provides estimates of brain waste among native-born and foreign-born residents of Colorado, showing one-fifth of all highly educated workers in the state affected, with the high levels of education of the foreign born more likely to be underutilized (25 percent versus 20 percent).

Relevance for WIOA Implementation: Highly educated individuals who are LEP fall into the “basic-skills-deficient” service priority category for Title I adult workforce services and also qualify for Title II-funded services. Many of these individuals have degrees in the health-care, STEM, and education fields where their skills can be applied in high-demand occupations. Nimble workforce and adult education

programs can help address the particular needs of these individuals by braiding funds across titles—or using strictly Title I funds—to help them return to jobs in their profession or a related field that will leverage the significant investments they have already made in their education and training.

5) Parents of Young Children

Parents of young children have long been a population of special focus for adult education and training programs due to the powerful role education and skills play in helping them provide economic stability for their family, and the predictive role of parental education—particularly the mother’s—for the future educational success of their children. This focus is especially pertinent now, with policymakers at all levels of government engaged in intensive efforts to scale quality early childhood programs that will close gaps in school readiness that could otherwise threaten children’s lifelong education and career prospects. As their children’s first and most important teachers, parents are universally acknowledged as critical to the success of these efforts.

Though only 12 percent of the state’s overall population ages 16 and older, Colorado’s immigrants and refugees account for 18 percent of parents residing with at least one child under age 18, and 19 percent of those with at least one child ages 0 to 8. Among parents residing with at least one child under age 18, single-mother or single-father households are less common among the foreign born (17 percent versus 21 percent for native born). Most strikingly, immi-

Table 5. Family Structure and Young-Child Parental Status for Colorado Residents (ages 16 and older), by Nativity, 2009-13

Parental Status	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Reside with at least one child under age 18	1,060,000	874,000	100%	186,000	100%
Single mother	156,000	133,000	15%	23,000	12%
Single father	56,000	48,000	6%	8,000	4%
Two parents	848,000	693,000	79%	155,000	83%
Reside with at least one child ages 0-8	649,000	524,000	100%	125,000	100%
Limited English Proficient (LEP)	78,000	5,000	1%	73,000	58%
Low-educated	81,000	33,000	6%	48,000	39%
Low-income (below 200% of FPL)	220,000	145,000	28%	75,000	60%

FPL = Federal poverty level.

Notes: The FPL, calculated based on total family income before taxes (excluding capital gains and noncash benefits such as food stamps), was \$23,834 for a family of four in 2013. All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

grants and refugees comprise 59 percent of the state’s low-educated parents of young children, being more than six times more likely than their native-born counterparts to lack a high school diploma or equivalent. Foreign-born parents of young children are also significantly more likely to have low incomes—60 percent versus 28 percent of the native born. Not surprisingly, foreign-born parents account for the vast majority of the state’s LEP parents of young children (93 percent).

Relevance for WIOA Implementation: Though WIOA’s Title II provisions speak of services that “enable parents or family members to support their children’s learning needs” and provide “training for parents or family members regarding how to be ... full partners in the education of their children,” the law’s performance measures leave little room for states to serve parents who are arguably most in need of these services. Many low-educated and/or LEP parents who seek such programs do not have learning goals that align with the law’s primary performance measures—particularly those focused on employment, earnings, and secondary/postsecondary degree and credential attainment.⁹ With all WIOA-funded programs judged according to these measures and with states facing financial

penalties should they not meet performance targets, many states and localities may be reluctant to provide AEFLA services to low-educated and LEP parents whose primary concerns are basic literacy and supporting their children’s kindergarten readiness and future educational success. Should Colorado choose to maintain parent-focused programs for this population it would likely need to negotiate lower performance targets for these programs on the law’s six accountability measures, and presumably judge their performance against state measures that better reflect expected outcomes of parent-focused programs. Alternatively, the state or its localities may simply avoid serving many parents of its most at-risk young children with AEFLA funds—even though failing to address their needs could undermine the success of investments being made by all levels of government in early childhood education and care (ECEC) services.

6) Poverty and Health Insurance

WIOA’s investments are intended to help meet local needs for skilled workers while also reducing welfare dependency and supporting workers in attaining education and skills that will allow

Table 6. Poverty and Health Insurance for Colorado Residents (ages 16 and older), by Nativity, 2009-13

Poverty	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Population (for whom poverty status is determined)	3,930,000	3,472,000	100%	458,000	100%
Below 100% of FPL	462,000	372,000	11%	90,000	20%
100-199% of FPL	627,000	507,000	15%	120,000	26%
At or above 200% of FPL	2,840,000	2,593,000	75%	248,000	54%
Health Insurance Coverage					
Total population	4,030,000	3,565,000	100%	464,000	100%
No health insurance coverage	675,000	497,000	14%	178,000	38%

FPL = Federal poverty level.

Notes: The FPL, calculated based on total family income before taxes (excluding capital gains and noncash benefits such as food stamps), was \$23,834 for a family of four in 2013. All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Source: MPI analysis of pooled 2009-13 ACS.

them to earn a family-sustaining wage. While many of Colorado’s immigrants enjoy high levels of education and earnings, Table 6 data indicate that the state’s foreign-born residents are significantly more likely to earn below either 100 percent or 200 percent of the federal poverty level (FPL),¹⁰ with 46 percent falling below the 200 percent threshold as compared to 25 percent for those who are native born. Looking to an additional indicator of economic vulnerability, the state’s foreign-born adults are more than 2.5 times as likely to lack health insurance coverage as those who are native born.

Relevance for WIOA Implementation: WIOA’s broad architecture as well as many of its specific provisions place a tight focus on directing services to low-income individuals, with the goal of helping them attain the education, degrees, and credentials they need to ensure a lifetime of improved earnings and economic stability. The disproportionate representation of foreign-born individuals among Colorado residents living in or near poverty provide important measures against which the adequacy of state and local service designs and equity in distribution of services can be gauged.

7) U.S. Citizenship and Immigration Status

Publicly available data from the U.S. Census Bureau’s American Community Survey (ACS) are the basis for all figures provided in the preceding sections of this profile. However, immigration status affects eligibility for certain WIOA services, and the ACS does not collect detailed information on respondents’ immigration status. To better assist stakeholders in considering the interplay of immigration status with WIOA implementation efforts, Table 7 provides estimates of the shares of foreign-born Colorado residents in key immigration-status categories. The MPI estimates are based on a methodology that imputes immigration status from two Census Bureau surveys—the ACS and the Survey of Income and Program Participation (SIPP).¹¹ In part because this methodology involves inflating ACS figures in order to account for presumed undercounting of noncitizens, especially those who are unauthorized, the figures are not directly comparable to the estimates used in the earlier portions of this profile.

Using this methodology, MPI estimates that among Colorado immigrants ages 16 and older,

Table 7. U.S. Citizenship Status of Foreign-Born Residents (ages 16 and older) in Colorado, 2009-13

U.S. Citizenship Status	Number	Percent
Foreign born	507,000	100%
Naturalized citizens	176,000	35%
Noncitizens	331,000	65%
Legal permanent residents	163,000	49%
Legal nonimmigrants	19,000	6%
Unauthorized immigrants	149,000	45%
DACA immediately eligible (2012)	17,000	12%
DACA eligible but for education (2012)	6,000	4%

Note: All numbers are rounded to the nearest thousand; calculations in the text use absolute numbers.

Sources: MPI analysis of U.S. Census Bureau data from the pooled 2009-13 ACS, and the 2008 Survey of Income and Program Participation (SIPP) by James D. Bachmeier and Colin Hammar of Temple University and Jennifer Van Hook of The Pennsylvania State University, Population Research Institute.

35 percent were naturalized citizens. Of the 331,000 noncitizens, 49 percent were legal permanent residents (LPRs) and 45 percent were unauthorized.¹² Within the unauthorized population, 16 percent—approximately 24,000 individuals—were potentially eligible to apply for protection from deportation and work authorization under the Deferred Action for Childhood Arrivals (DACA) program when it first launched in 2012, with thousands more aging into eligibility since that time. Many have come forward to obtain these protections; according to U.S. Citizenship and Immigration Services (USCIS), 15,784 Colorado residents had received DACA status as of September 2015.¹³

Relevance for WIOA Implementation: Immigration status is relevant to a variety of WIOA programs beyond the broad provisions

described earlier that restrict unauthorized immigrants from accessing Title I services and the absence of status restrictions placed on Title II services. For example, under Title II a primary purpose of the Integrated English Literacy and Civics Education program is to support immigrants in preparing for citizenship and full participation in the civic life of their community.¹⁴ And while all immigrants—regardless of immigration status—are eligible for AEFLA services, states that choose to braid Title I and II funds to provide integrated education and training services may inadvertently place Title II funds beyond the reach of unauthorized immigrants and/or create the need to implement complex new administrative procedures to assess the immigration status of recipients of adult education services.

Endnotes

- 1 See, for example, John Wachen, Davis Jenkins, Clive Belfield, and Michelle Van Noy with Amanda Richards and Kristen Kulongoski, *Contextualized College Transition Strategies for Adult Basic Skills Students: Learning from Washington State's I-BEST Program Model* (New York: The Community College Research Center, Teacher's College, Columbia University, 2012), 21-22, <http://ccrc.tc.columbia.edu/publications/i-best-program-final-phase-report.html>.
- 2 See the final section of this fact sheet for additional data and information on immigration status issues.
- 3 In addition, many unauthorized young adults are eligible for protection under the Deferred Action for Childhood Arrivals (DACA) program; DACA approval would allow them to qualify for *Workforce Innovation and Opportunity Act* (WIOA) Title I services, as opposed to strictly *Adult Education and Family Literacy Act* (AEFLA)-funded services.
- 4 Limited English Proficient (LEP) refers to any person age 5 and older who reported speaking English less than "very well" as classified by the U.S. Census Bureau.
- 5 Individuals considered a priority for Title I adult employment and training services are "recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient." See *Workforce Investment and Opportunity Act*, Public Law 113-128, *U.S. Statutes at Large* 128 (2014) 1425, Title I Sec. 134 (c)(3)(E), www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf.
- 6 For example, in 2013 Title II adult education programs served about 1.6 million people while MPI estimates that among adults 19 and over, approximately 43 million were either low-educated or LEP. For adult education enrollment data, see U.S. Department of Education, Office of Career, Technical, and Adult Education, National Reporting System, "State Enrollment by Program Type (ABE, ASE, ESL): All States," program year 2013, <https://wdcrobcolp01.ed.gov/CFAPPS/OVAE/NRS/reports/>.
- 7 Social Policy Research Associates, *Program Year 2014 WIASRD Data Book Colorado* (Washington, DC: U.S. Department of Labor, Employment and Training Administration, Office of Performance and Technology, 2016), www.doleta.gov/performance/results/WIASRD/PY2014/PY2014%20WIASRD%20State%20Data%20Book-CO.pdf.
- 8 Jeanne Batalova and Michael Fix with Peter A. Creticos, *Uneven Progress: The Employment Pathways of Skilled Immigrants in the United States* (Washington, DC: Migration Policy Institute, 2008), www.migrationpolicy.org/research/uneven-progress-employment-pathways-skilled-immigrants-united-states.
- 9 See *Workforce Investment and Opportunity Act*, Title I Sec. 116(b)(2)(A)(i) for a description of the law's six accountability measures.
- 10 The federal poverty level (FPL), calculated based on total family income before taxes (excluding capital gains and noncash benefits such as food stamps), was \$23,834 for a family of four in 2013. For more information, see U.S. Census Bureau, "How the Bureau Measures Poverty," accessed November 23, 2015, www.census.gov/hhes/www/poverty/about/overview/measure.html.
- 11 For a detailed discussion of this methodology, see Randy Capps, Michael Fix, Jennifer Van Hook, and James D. Bachmeier, *A Demographic, Socioeconomic, and Health Coverage Profile of Unauthorized Immigrants in the United States* (Washington, DC: Migration Policy Institute, 2013), www.migrationpolicy.org/research/demographic-socioeconomic-and-health-coverage-profile-unauthorized-immigrants-united-states.
- 12 For more detailed estimates of the unauthorized population in Colorado prepared using this methodology at national, state, and top county levels, see MPI Data Hub, "Unauthorized Immigrant Population Profiles," www.migrationpolicy.org/programs/us-immigration-policy-program-data-hub/unauthorized-immigrant-population-profiles.

13 U.S. Citizenship and Immigration Services (USCIS), “Number of 1-821D, Consideration of Deferred Action for Childhood Arrivals by Fiscal Year, Quarter, Intake, Biometrics and Case Status: 2012-2015 (September 30),” accessed March 3, 2016, www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/I821_daca_performancedata_fy2015_qtr4.pdf.

14 *Workforce Innovation and Opportunity Act*, Title II Sec. 203 (12).

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Margie McHugh is Director of the Migration Policy Institute’s National Center on Immigrant Integration Policy. Her work focuses on education quality and access issues for immigrants and their children from early childhood through K-12 and adult, postsecondary and workforce skills programs. She also leads the Center’s work seeking a more coordinated federal response to immigrant integration needs and impacts, and more workable systems for recognition of the education and work experience immigrants bring with them to the United States.

Prior to joining MPI, Ms. McHugh served for 15 years as Executive Director of The New York Immigration Coalition, an umbrella organization for over 150 groups in New York that uses research, policy development, and community mobilization efforts to achieve landmark integration policy and program initiatives. Prior to joining NYIC, Ms. McHugh served as Deputy Director of New York City’s 1990 Census Project and as Executive Assistant to New York Mayor Ed Koch’s chief of staff.

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