MIGRATION POLICY INSTITUTE
NATIONAL CENTER ON IMMIGRANT INTEGRATION POLICY

Fact Sheet

December 2015

Immigrants and WIOA Services

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

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Immigration Facts

This fact sheet provides a profile of key characteristics of foreign-born and native-born residents of Massachusetts that are relevant to understanding needs within the state for adult education and workforce training services. It is part of a larger series of state and county data 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.

I) Nativity, Age, and Origin of Massachusetts Residents

As of 2009-13, Massachusetts was home to 5.4 million residents ages 16 and older; 944,000 of whom, or 18 percent, were foreign born. Relatively fewer of the state'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 nearly 70 percent falling in the 25-to-44 and 45-to-59 age bands. They are also less likely to be over 60 than the native born (21 percent versus 25 percent).

Only 36 percent of the state's foreign born hail from Latin America, as compared to 53 percent nationwide; 28 percent are of Asian origin—the same as the national share; and 25 percent are of European origin, nearly double 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 subpopulations 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 provisions. This includes, for example, ensuring that language barriers do not impede access to information and services provided by the American Job Centers (formerly known as One-

Table 1. Age, Gender, and Origin of the Massachusetts 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	5,379,000	4,435,000	100%	944,000	100%
Age Groups					
16 to 18	277,000	254,000	6%	23,000	2%
19 to 24	579,000	505,000	11%	74,000	8%
25 to 44	1,749,000	1,346,000	30%	403,000	43%
45 to 59	1,457,000	1,209,000	27%	248,000	26%
60 and over	1,317,000	1,121,000	25%	196,000	21%
Gender					
Female	2,806,000	2,316,000	52%	490,000	52%
Regions of Birth (excluding birth at sea and unspecified countries)					
Africa	X	X	X	54,000	6%
Asia	X	X	X	267,000	28%
Europe	X	X	X	233,000	25%
Latin America	X	X	X	336,000	36%
Northern America	X	X	X	50,000	5%
Oceania	X	X	X	3,000	0%

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).

Stop Career Centers) through which states and localities organize local access to WIOA-funded services. Given the highly diverse nature of the foreign-born population (and range of educational backgrounds and levels of English proficiency—as described below), all levels of government engaged in implementing WIOA face complex challenges in ensuring that the nation's large and diverse immigrant population has equitable access to services provided under the law.

2) Educational Attainment

Foreign-born young adults represent 13 percent of the state's 19-to-24-year-old population but are nearly twice as likely to lack a high school diploma or equivalent (HSD/E) as their native-born peers, comprising almost one-quarter of state residents in this age range who have not obtained a HSD/E. While foreign-born young adults who lack a HSD/E are as likely as their native-born peers to be enrolled in school, they are significantly more likely than the native born to be working (46 percent versus 30 percent).

Foreign-born individuals account for 19 percent of Massachusetts residents ages 25 and older; they are nearly three times more likely than the native born to lack a HSD/E, accounting for 41 percent of adults who have not completed high school. At the other end of the education spectrum, foreign-born individuals are also less likely than the native born to hold a bachelor's degree or higher (35 percent versus 40 percent).

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 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 Massachusetts immigrants legally reside in the 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 ages 19 to 24 who lack a HSD/E and are not enrolled are far more likely than their native-born counterparts to be employed. This points to a need for education and training services designed for "nontraditional" students—i.e., in addition to using appropriate instructional

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

	Total	Native Born		Foreign Born	
Educational Attainment	Number	Number	Percent	Number	Percent
Population ages 16 to 18	277,000	254,000	100%	23,000	100%
Not enrolled and no high school diploma or equivalent	8,000	7,000	3%	-	-
Population ages 19 to 24	579,000	505,000	100%	74,000	100%
With at least high school diploma or equivalent	536,000	472,000	93%	64,000	87%
Without high school diploma or equivalent	43,000	33,000	7%	10,000	13%
Enrolled in school	11,000	9,000	27%	3,000	27%
Not enrolled in school and not employed	17,000	14,000	44%	3,000	28%
Not enrolled in school and employed	14,000	10,000	30%	4,000	46%
Population ages 25 and older	4,523,000	3,676,000	100%	847,000	100%
Less than high school diploma or equivalent	480,000	283,000	8%	197,000	23%
High school diploma or equivalent	1,180,000	973,000	26%	207,000	24%
Some college or associate's degree	1,089,000	941,000	26%	149,000	18%
Bachelor's, graduate, or professional degree	1,774,000	1,479,000	40%	295,000	35%
Foreign college-educated	X	X	X	164,000	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.

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 Massachusetts residents are provided below given the relevance of LEP status[4] 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.

Not surprisingly, foreign-born individuals account for 83 percent of the state's LEP residents, with the 17 percent of native-born LEP residents comprised largely of Spanish speakers.[6] The total number of LEP individuals (515,000) is nearly as large as the total number of low-educated individuals ages 19 and older in the state (523,000). However, only adults with less than a high school education are counted in the formula used by the federal government to provide adult education funds to states.[7]

Among all LEP individuals ages 19 to 24 and ages 25 and over, nearly 193,000 lack a HSD/E, indicating that 37 percent of the state's low-educated adults are also LEP. Significant numbers of LEP individuals also have high levels of underlying education, including 136,000 of those ages 25 and older who have earned a high school diploma or equivalent, and an additional 149,000 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:
Massachusetts' large number of LEP individuals closely rivals its number of those who are low educated; each group is eligible for AEFLA services, which in recent years meet only about 4 percent of need nationally.[8] 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 Massachusetts 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 the employment or postsecondary transition and completion goals that are the primary focus of the law's narrow accountability measures—for example, immigrant mothers of young children seeking literacy and other programming that will help them support their children's kindergarten readiness, or those seeking citizenship preparation services.

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 skill-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 weak. For example, nationally in the past five years LEP individuals have consistently comprised less than 2 percent of individuals receiving Title I-funded intensive or training services.[9]

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 envisioned 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.[10] Fifty-six percent of the state's foreign-born residents who possess a college degree or higher were educated abroad (see Table 2), indicating that a significant share of highly educated immi-

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

	Total	Native Born		Foreign Born	
LEP Population by Educational Attainment	Number	Number	Percent Native Born	Number	Percent Foreign Born
Total LEP population	515,000	88,000	17%	427,000	83%
	Number	Number	Percent	Number	Percent
LEP population ages 16 to 18	11,000	5,000	100%	6,000	26%
Not enrolled and no high school diploma or equivalent	-	-	-	-	-
LEP population ages 19 to 24	35,000	10,000	100%	26,000	100%
With at least high school diploma or equivalent	27,000	8,000	79%	19,000	74%
Without high school diploma or equivalent	9,000	2,000	21%	7,000	26%
Enrolled in school	2,000	-	-	-	-
Not enrolled in school and not employed	3,000	-	-	2,000	32%
Not enrolled in school and employed	4,000	-	-	3,000	49%
LEP population ages 25 and older	468,000	73,000	100%	395,000	100%
Less than high school diploma or equivalent	184,000	32,000	44%	152,000	39%
High school diploma or equivalent	136,000	21,000	29%	115,000	29%
Some college or associate's degree	67,000	12,000	16%	55,000	14%
Bachelor's, graduate, or professional degree	82,000	8,000	12%	73,000	19%

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 Massachusetts Residents (ages 25 and older), by Nativity, 2009-13

	Native Born		Foreign Born	
Brain Waste	Number	Percent	Number	Percent
Total civilian, college-educated labor force	1,182,000	100%	232,000	100%
Underutilized (i.e., in low-skilled jobs or unemployed)	211,000	18%	49,000	21%

Note: 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 in Massachusetts 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, 73,000 (19 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 Massachusetts, showing almost one-fifth of all highly educated workers in the state affected, with the high levels of education of the foreign born slightly more likely to be underuti-lized (21 percent versus 18 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 AEFLA-funded services. Many of these individuals have degrees in the healthcare, 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—in the future education 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 18 percent of the state's overall population ages 16 and older, immigrants and refugees account for 23 percent of parents residing with at least one child under age 18, and 26 percent of those with at least one child ages 0 to 8. Among parents residing with a child under age 18, single-mother or single-father households are slightly less common among the foreign born (20 percent versus 22 percent

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

	Total	Native Born		Foreign Born	
Parental Status	Number	Number	Percent	Number	Percent
Reside with at least one child under age 18	1,276,000	979,000	100%	297,000	100%
Single mother	214,000	168,000	17%	46,000	15%
Single father	55,000	42,000	4%	13,000	4%
Two parents	1,007,000	768,000	78%	239,000	80%
Reside with at least one child ages 0-8	726,000	537,000	100%	189,000	100%
Limited English Proficient (LEP)	89,000	11,000	2%	78,000	41%
Low-educated	52,000	24,000	5%	28,000	15%
Low-income (below 200% of FPL)	177,000	111,000	21%	67,000	35%

FPL = Federal poverty level.

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

Source: MPI analysis of pooled 2009-13 ACS.

for native born). Most strikingly, immigrants and refugees comprise 53 percent of the state's low-educated parents of young children, being three 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—35 percent versus 21 percent for those who are native born. Not surprisingly, foreign-born parents account for the vast majority of the state's LEP parents of young children (88 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.[11] 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 Massachusetts chose to maintain parent-focused services 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 services.

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

	Total	Native Born		Foreign Born	
Poverty	Number	Number	Percent	Number	Percent
Population (for whom poverty status is determined)	5,165,000	4,245,000	100%	920,000	100%
Below 100% of FPL	546,000	415,000	10%	131,000	14%
100-199% of FPL	671,000	503,000	12%	168,000	18%
At or above 200% of FPL	3,948,000	3,327,000	78%	622,000	68%
Health Insurance Coverage					
Total population	5,379,000	4,435,000	100%	944,000	100%
No health insurance coverage	259,000	169,000	4%	90,000	10%

FPL = Federal poverty level.

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

Source: MPI analysis of pooled 2009-13 ACS.

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 them to earn a family-sustaining wage. While many immigrants in Massachusetts 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),[12] with 32 percent falling below the 200 percent threshold as compared to 22 percent for those who are native born. Looking to an additional indicator of economic vulnerability, the state's foreign-born adults are more than twice as likely to lack health insurance coverage compared to 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 state 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 MPI estimates of the shares of foreign-born U.S. residents in key immigration-status categories. The 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).[13] 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

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

U.S. Citizenship Status	Number	Percent
Foreign born	1,027,000	100%
Naturalized citizens	486,000	47%
Noncitizens	542,000	53%
Legal permanent residents	302,000	56%
Legal nonimmigrants	67,000	12%
Unauthorized immigrants	173,000	32%
DACA immediately eligible (2012)	19,000	11%
DACA eligible but for education (2012)	2,000	1%

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

the estimates used in the earlier portions of this profile.

Using this methodology, MPI estimates that among Massachusetts immigrants ages 16 and older, 47 percent were naturalized citizens. Of the 542,000 noncitizens, slightly over half were lawful permanent residents (LPRs) and nearly one-third were unauthorized.[14] Within the unauthorized population, 12 percent—about 21,000 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), 6,614 Massachusetts residents had received DACA status as of June 2015.[15]

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 AEFLA services. For example, under Title II a primary goal 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.[16] 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, www.sbctc.ctc.edu/college/abepds/ibest_ccrc_report_december2012.pdf.

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 WIOA Title I services, as opposed to strictly Adult Education and Family Literacy Act-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 American Fact Finder, "Nativity by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" 2011-2013 American Community Survey 3-Year Estimates, accessed November 23, 2015, www.factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_3YR_B16005&prodType=table.

7 See, for example, Randy Capps, Michael Fix, Margie McHugh, and Serena Yi-Ying Lin, *Taking Limited English Proficient Adults into Account in the Federal Adult Education Funding Formula* (Washington, DC: Migration Policy Institute, 2009), www.migrationpolicy.org/research/taking-limited-english-proficient-adults-account-federal-adult-education-funding-formula.

8 For example, in 2013 Title II adult education programs served about 1.6 million people while the Migration Policy Institute (MPI) estimates that among adults ages 19 and older, 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, www.wdcrobcolp01.ed.gov/CFAPPS/OVAE/NRS/reports/.

9 Social Policy Research Associates, *Program Year 2013 WIASRD Data Book* (Washington, DC: U.S. Department of Labor, Employment and Training Administration, Office of Performance and Technology, 2015), www.doleta.gov/performance/results/pdf/PY_2013_WIASRD_Data_Book.pdf.

10 Jeanne Batalova, Michael Fix, and 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.

11 See *Workforce Investment and Opportunity Act*, Title I Sec. 116(b)(2)(A)(i) for a description of the law's six accountability measures.

12 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.

13 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.

14 For more detailed MPI estimates of the unauthorized population in Massachusetts prepared using this methodology at national, state, and top county levels, see MPI Data Hub, "Unauthorized Immigrant Population Profiles," accessed November 23, 2015, www.migrationpolicy.org/programs/us-immigration-policy-program-data-hub/unauthorized-immigrant-population-profiles.

15 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 (June 30)" accessed November 20, 2015, www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/I821d_performancedata_fy2015_qtr3.pdf.

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

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Acknowledgments

The authors are grateful to MPI colleagues Jie Zong and Jeanne Batalova for their compilation of U.S. Census Bureau data used throughout this fact sheet.

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Cover Design: April Siruno, MPI
Layout: Liz Heimann, MPI

Suggested citation: McHugh, Margie and Madeleine Morawski. 2015. *Immigrants and WIOA Services: Comparison of Sociodemographic Characteristics of Native- and Foreign-Born Adults in Massachusetts*. Washington, DC: Migration Policy Institute.

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