



## Immigrants and WIOA Services

### Comparison of Sociodemographic Characteristics of Native- and Foreign-Born Adults in Santa Clara County, California

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This fact sheet provides a profile of key characteristics of foreign-born and native-born residents of Santa Clara County 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 2010-14 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 Santa Clara County Residents

As of 2010-14, Santa Clara County was home to more than 1.4 million residents ages 16 and older; 656,000 of whom, or 45 percent, were foreign born. Relatively fewer of the county'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 74 percent falling in the 25-to-44 and 45-to-59 age bands (compared to 57 percent of those who are native born). Of particular note are the 46 percent of foreign-born individuals who are 25 to 44 years old, a group that will continue to play a key role in the county's labor force for several decades to come.

The majority (63 percent) of the county's immigrant residents ages 16 and over hail from Asia, significantly higher than the 28 percent share nationally; 25 percent are of Latin American origin, far lower than the national share of 53 percent; and 8 percent are European, again lower than the national share, which is 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 pro-

**Table 1. Age, Gender, and Origin of the Santa Clara County Population (ages 16 and older), by Nativity, 2010-14**

	Total		Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent	
Total population ages 16 and over	1,449,000	793,000	100%	656,000	100%	
<b>Age Groups</b>						
16 to 18	68,000	58,000	7%	11,000	2%	
19 to 24	138,000	105,000	13%	33,000	5%	
25 to 44	560,000	259,000	33%	301,000	46%	
45 to 59	378,000	194,000	24%	184,000	28%	
60 and over	305,000	177,000	22%	128,000	19%	
<b>Gender</b>						
Female	725,000	389,000	49%	336,000	51%	
<b>Regions of Birth (excluding birth at sea and unspecified countries)</b>						
Africa	X	X	X	10,000	2%	
Asia	X	X	X	414,000	63%	
Europe	X	X	X	53,000	8%	
Latin America	X	X	X	167,000	25%	
Northern America	X	X	X	8,000	1%	
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 2010-14 American Community Survey (ACS).

vided 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 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 Santa Clara County face complex challenges in ensuring that the county’s diverse immigrant and refugee populations have equitable access to services provided under the law.

## 2) Educational Attainment

Foreign-born young adults represent 24 percent of the county’s 19- to 24-year-olds but are more than twice as likely as native-born peers to lack a high school diploma or equivalent (HSD/E), comprising 42 percent of residents in this age range who have not obtained a HSD/E. Further, among those who lack a HSD/E and are not enrolled in school, foreign-born young adults are far more likely than the native born to be working (56 percent versus 37 percent).

Foreign-born individuals account for nearly half of Santa Clara County residents ages 25 and older; they are more than three times as likely as native-born peers to lack a HSD/E, accounting for 76 percent of adults in this age group who have not completed high school. At the other end of the education spectrum, 48 percent of foreign-born individuals ages

25 and over hold a bachelor's degree or higher as compared to 46 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, 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 local workforce boards, given the difficulties many such pathway programs face in equitably serving adults with basic skills needs.<sup>1</sup> Integrated education and training models must also comply with immigration status restrictions placed on Title I-funded programs.<sup>2</sup> However, while those who lack work authorization are not eligible for WIOA-funded workforce services, all refugees and the majority of Santa Clara County 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.<sup>3</sup>

**Table 2. Educational Attainment of Santa Clara County Residents (ages 16 and older), by Nativity, 2010-14**

Educational Attainment	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Population ages 16 to 18	68,000	58,000	100%	11,000	100%
Not enrolled and no high school diploma or equivalent	2,000	1,000	2%	-	-
Population ages 19 to 24	138,000	105,000	100%	33,000	100%
With at least high school diploma or equivalent	127,000	99,000	94%	28,000	85%
Without high school diploma or equivalent	11,000	7,000	6%	5,000	15%
Enrolled in school	2,000	2,000	23%	-	-
Not enrolled in school and not employed	4,000	3,000	39%	1,000	31%
Not enrolled in school and employed	5,000	2,000	37%	3,000	56%
Population ages 25 and older	1,242,000	630,000	100%	612,000	100%
Less than high school diploma or equivalent	163,000	39,000	6%	124,000	20%
High school diploma or equivalent	194,000	103,000	16%	91,000	15%
Some college or associate's degree	303,000	198,000	31%	105,000	17%
Bachelor's, graduate, or professional degree	583,000	290,000	46%	293,000	48%
Foreign college-educated	X	X	X	161,000	55%

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

Source: MPI analysis of pooled 2010-14 ACS.

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 Santa Clara County residents are provided below given the relevance of LEP status<sup>4</sup> 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.<sup>5</sup> 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 95 percent of Santa Clara County’s LEP residents. The total number of LEP residents (339,000) is higher than the total number of low-educated individuals ages 19 and older in the county (174,000). 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.<sup>6</sup>

Among all LEP individuals ages 19 to 24 and ages 25 and older, 115,000 lack a HSD/E, indicating that 66 percent of the county’s low-

educated adults are also LEP. Significant numbers of LEP individuals also have high levels of underlying education, including 67,000 native- and foreign-born LEP individuals ages 25 and older who have earned a high school diploma or equivalent, and an additional 141,000 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:** Santa Clara County’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.<sup>7</sup> Local workforce development boards face complex challenges in equitably reflecting the significant and wide range of LEP learner needs and goals in the local plans that will govern WIOA service provision and that the governor must ultimately approve. For one, the county’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 California where, for example, only 3.7 percent of those exiting from Title I adult intensive or training services in the 2014-15 program year were LEP.<sup>8</sup>

Stakeholders in WIOA’s implementation therefore face challenges in ensuring that local service plans and the state’s Unified 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

**Table 3. Limited English Proficiency and Educational Attainment of Santa Clara County Residents (ages 16 and older), by Nativity, 2010-14**

LEP Population by Educational Attainment	Total	Native Born		Foreign Born	
	Number	Number	Percent Native Born	Number	Percent Foreign Born
Total LEP population	339,000	17,000	5%	322,000	95%
	Number	Number	Percent	Number	Percent
LEP population ages 16 to 18	5,000	2,000	100%	3,000	30%
Not enrolled and no high school diploma or equivalent	-	-	-	-	-
LEP population ages 19 to 24	16,000	3,000	100%	14,000	100%
With at least high school diploma or equivalent	13,000	3,000	90%	10,000	73%
Without high school diploma or equivalent	4,000	-	-	4,000	27%
Enrolled in school	-	-	-	-	-
Not enrolled in school and not employed	-	-	-	-	-
Not enrolled in school and employed	2,000	-	-	2,000	58%
LEP population ages 25 and older	318,000	13,000	100%	305,000	100%
Less than high school diploma	111,000	4,000	31%	107,000	35%
High school diploma or equivalent	67,000	3,000	23%	64,000	21%
Some college or associate’s degree	55,000	3,000	20%	52,000	17%
Bachelor’s, graduate, or professional degree	86,000	3,000	25%	82,000	27%

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 2010-14 ACS.

**Table 4. Brain Waste among Santa Clara County Residents (ages 25 and older), by Nativity, 2010-14**

Brain Waste	Native Born		Foreign Born	
	Number	Percent	Number	Percent
Total civilian, college-educated labor force	219,000	100%	223,000	100%
Underutilized (i.e., in low-skilled jobs or unemployed)	36,000	16%	34,000	15%

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

Source: MPI analysis of pooled 2010-14 ACS.

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.<sup>9</sup> More than half (55 percent) of Santa Clara County’s foreign-born individuals who possess a college degree or higher were educated abroad (see Table 2), indicating a significant share of the county’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, 82,000 (27 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 Santa Clara County, showing almost 16 percent of all highly educated workers in the county affected.

**Relevance for WIOA Implementation:** Highly educated individuals who are LEP fall into the “basic-skills-deficient” service priority cat-

egory 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 they account for 45 percent of the county’s overall population ages 16 and older, Santa Clara County’s immigrants and refugees



**Table 5. Family Structure and Young-Child Parental Status for Santa Clara County Residents (ages 16 and older), by Nativity, 2010-14**

Parental Status	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Reside with at least one child under age 18	416,000	165,000	100%	251,000	100%
Single mother	44,000	25,000	15%	19,000	8%
Single father	17,000	9,000	5%	8,000	3%
Two parents	355,000	131,000	79%	224,000	89%
Reside with at least one child ages 0-8	257,000	100,000	100%	157,000	100%
Limited English Proficient (LEP)	68,000	2,000	2%	66,000	42%
Low-educated	29,000	5,000	5%	24,000	15%
Low-income (below 200% of FPL)	54,000	16,000	16%	38,000	24%

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 FPL, calculated based on total family income before taxes (excluding capital gains and noncash benefits such as food stamps), was \$24,230 for a family of four in 2014. All numbers are rounded to the nearest thousand; calculations throughout the text use absolute numbers.

Source: MPI analysis of pooled 2010-14 ACS.

account for 60 percent of parents residing with at least one child under age 18, and 61 percent of those residing with a young child ages 0 to 8. Among parents residing with at least one child under age 18, single-mother or single-father households are significantly less common among the foreign born (11 percent versus 21 percent for native born). Most strikingly, immigrants and refugees comprise 82 percent of the county'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 more likely to have low incomes—24 percent versus 16 percent of the native born. Not surprisingly, foreign-born parents account for the vast majority of the county's LEP parents of young children (97 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 and localities to serve parents who are arguably most in need of these services. Many low-educated and/or LEP par-

ents 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/post-secondary degree and credential attainment.<sup>10</sup> With all WIOA-funded programs judged according to these measures, and with local areas facing corrective actions should they not meet performance targets, many 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 Santa Clara County choose to maintain parent-focused programs for this population it would likely need the state of California to negotiate lower performance targets for these programs on the law's six accountability measures, and presumably judge their performance against measures that better reflect expected outcomes of parent-focused programs. Alternatively, the state and 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.

**Table 6. Poverty and Health Insurance for Santa Clara County Residents (ages 16 and older), by Nativity, 2010-14**

Poverty	Total	Native Born		Foreign Born	
	Number	Number	Percent	Number	Percent
Population (for whom poverty status is determined)	1,427,000	775,000	100%	653,000	100%
Below 100% of FPL	135,000	67,000	9%	68,000	10%
100-199% of FPL	182,000	82,000	11%	100,000	15%
At or above 200% of FPL	1,110,000	625,000	81%	485,000	74%
<b>Health Insurance Coverage</b>					
Total population	1,449,000	793,000	100%	656,000	100%
No health insurance coverage	180,000	76,000	10%	104,000	16%

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 \$24,230 for a family of four in 2014. All numbers are rounded to the nearest thousand; calculations throughout the text use absolute numbers.

Source: MPI analysis of pooled 2010-14 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 of Santa Clara County’s immigrants enjoy high levels of education and earnings, Table 6 data indicate that the county’s foreign-born residents are more likely to earn below either 100 percent or 200 percent of the federal poverty level (FPL),<sup>11</sup> with 26 percent falling below the 200 percent threshold as compared to 19 percent for those who are native born. Looking to an additional indicator of economic vulnerability, the county’s foreign-born adults are more than 1.5 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 Santa Clara County 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 Santa Clara County residents in key immigration-status categories.<sup>12</sup> 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).<sup>13</sup> 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



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

U.S. Citizenship Status	Number	Percent
Foreign born	689,000	100%
Naturalized citizens	347,000	50%
Noncitizens	342,000	50%
Legal permanent residents	162,000	47%
Legal nonimmigrants	49,000	14%
Unauthorized immigrants	132,000	39%
DACA immediately eligible (2012)	13,000	10%
DACA eligible but for education (2012)	5,000	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.

are not directly comparable to the estimates used in the earlier portions of this profile.

Using this methodology, MPI estimates that among Santa Clara County immigrants ages 16 and older, 50 percent were naturalized citizens. Of the 342,000 noncitizens, 47 percent were legal permanent residents (LPRs) and 39 percent were unauthorized.<sup>14</sup> Within the unauthorized population, 14 percent—more than 18,000 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.

**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.<sup>15</sup> And while all immigrants—regardless of immigration status—are eligible for AEFLA services, states and localities 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/media/k2/attachments/i-best-program-final-phase-report.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 *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](http://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf).
- 6 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](http://www.migrationpolicy.org/research/taking-limited-english-proficient-adults-account-federal-adult-education-funding-formula).
- 7 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 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://wdcrocolp01.ed.gov/CFAPPS/OVAE/NRS/reports/>.
- 8 Social Policy Research Associates, *Program Year 2014 WIASRD Data Book California* (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-CA.pdf](http://www.doleta.gov/performance/results/WIASRD/PY2014/PY2014%20WIASRD%20State%20Data%20Book-CA.pdf).
- 9 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](http://www.migrationpolicy.org/research/uneven-progress-employment-pathways-skilled-immigrants-united-states).
- 10 See *Workforce Investment and Opportunity Act*, Title I Sec. 116(b)(2)(A)(i) for a description of the law's six accountability measures.
- 11 The federal poverty level (FPL), calculated based on total family income before taxes (excluding capital gains and noncash benefits such as food stamps), was \$24,230 for a family of four in 2014. For more information, see U.S. Census Bureau, "How the Bureau Measures Poverty," accessed March 3, 2016, [www.census.gov/hhes/www/poverty/about/overview/measure.html](http://www.census.gov/hhes/www/poverty/about/overview/measure.html).
- 12 While estimates in Tables 1-6 use U.S. Census Bureau data from the pooled 2010-14 American Community Surveys (ACS), estimates in Table 7 are based on the pooled 2009-13 ACS and the 2008 Survey of Income and Program Participation (SIPP).

- 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](http://www.migrationpolicy.org/research/demographic-socioeconomic-and-health-coverage-profile-unauthorized-immigrants-united-states).
- 14 For more detailed estimates of the unauthorized population in Santa Clara County prepared using this methodology at national, state, and top county levels, see MPI Data Hub, "Profile of the Unauthorized Population: Santa Clara County, CA," <http://www.migrationpolicy.org/data/unauthorized-immigrant-population/county/6085>.
- 15 *Workforce Innovation and Opportunity Act*, Title II Sec. 203 (12).

## About the Authors



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