THE ROADMAP FOR RACIAL EQUITY

An imperative for workforce development advocates

Special Edition: Immigrants and English Learners

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This fact sheet features excerpts from The Roadmap for Racial Equity report. Read the full Roadmap at National Skills Coalition’s website.

NOTE: This fact sheet recognizes that the challenges faced by people of color with deep generational roots in the United States and the challenges faced by immigrants sometimes differ. The policies highlighted here focus on addressing inequities for people of color who are immigrants and English learners. Other policies included in the larger Roadmap report focus on US-born individuals. View the full report at nationalskillscoalition.org/Roadmap.

This fact sheet also acknowledges that education and workforce development is a crucial component, but not the sole answer, to addressing the vast employment, income, and wealth inequities between people of color and White Americans in the US. It is our hope that the agenda included here for advancing racial equity within state and federal workforce policies aligns with and supplements broader efforts in both the public and private sectors to achieve racial and economic justice.
Definitions

**Racial equity:**
Racial equity is achieved when race or immigration status is no longer correlated with one’s outcomes; when everyone has what they need to thrive, no matter where they live. An example of achieving racial equity in workforce development is when race or immigration status no longer determines the likelihood of a participant’s completion of a training program or their educational attainment.¹

**Structural racism:**
A system in which public policies, institutional practices, cultural representations, and other norms work in various, often reinforcing ways to perpetuate racial group inequity. It identifies dimensions of our history and culture that have allowed privileges associated with ‘whiteness’ and disadvantages associated with ‘color’ to endure and adapt over time. Structural racism is not something that a few people or institutions choose to practice. Instead it has been a feature of the social, economic, and political systems in which we all exist.²
Racial disparities and the need for policy solutions

The ethnic and racial diversity of the residents of the United States of America is one of our country’s unique strengths. However, Black, Latinx, Pacific Islander, Native, and certain Asian American workers face wide racial inequities in educational attainment, employment, and income. Immigrants and English learners, the majority of whom are people of color, face similar inequities.

While the Covid-19 pandemic has drawn renewed attention to these inequities, they existed long before the pandemic. The US has fueled these disparities through decades of intentional, structurally racist policies, including those that have shaped postsecondary education and training. These disparities carry huge implications for people, businesses, and our economy. As long as these inequities exist, our country is undercutting its own economic competitiveness:

Racial workforce diversity is a key driver of America’s economic growth, as it is one of the most important predictors of business sales revenue, customer numbers, and profitability.

Today, US businesses find themselves as a crucial inflection point in their search for talent. Jobs that require skills training beyond high school, but not a four-year degree, make up the largest part of the labor market in the United States and in each of the fifty states.

Yet too few workers can access the training and education needed for these jobs. As the charts on the next page indicate, racial disparities in educational attainment exist for both US-born and immigrant adults. For example, Latinx immigrants are the least likely to have attained an associate degree or higher, with just 15 percent of adults reaching that threshold. There are also very wide differences in attainment among the many different ethnicities categorized as Asian. For example, just 11 percent of Bhutanese Americans have an associate degree or higher, and 23 percent of Pacific Islander, Laotian, and Cambodian Americans have reached that level of educational attainment. In contrast, higher percentages of South Asian (78 percent) and East Asian Americans (66 percent) have reached at least the associate degree level in their education.

All of these disparities are the result of historical and current policies and practices that have systemically limited educational and economic opportunities for people of color. These inequities are especially urgent from a racial equity perspective because within ten years, people of color will make up more than half of the US workforce.

Already, immigrants comprise one in six American workers, and English learners make up one in ten workers. Most immigrants are non-White, and this trend is expected to continue well into the future, with Asian and Latinx immigrants making up the largest shares of new Americans. English learners are similarly likely to be people of color. And as the recent pandemic has once again demonstrated, workers of color are disproportionately vulnerable to layoffs and pay cuts.

If American education and training programs produced more equitable results for workers of color, the country could close the gap between the number of jobs that require skills training...
Current educational attainment and projected state/national-level job education requirements by race/ethnicity and nativity: United States, AA degree or higher, 2015

and the number of workers who have such training. Expanding career pathways for people of color and supporting their advancement along these pathways are necessary precursors to achieving positive economic outcomes. This includes ensuring that workers recently displaced because of the pandemic have equitable opportunities to build their skills and prepare for in-demand jobs as the US labor market continues to adjust to a post-pandemic reality.

Because public policy decisions have played a key role in forming racial inequities, policies must also be an integral part of the solution. Now is the time to adjust workforce policies and craft new ones to ensure that every person in our country has a fair shot at achieving economic stability and success. This is the right aspiration, especially for a country that professes the ideals of liberty and justice for all.

**Getting specific: Policy solutions to improve racial equity**

Policymakers and advocates can use a variety of tools to help improve racial equity and prepare more workers of color for in-demand jobs. As communities implement new and expanded education and workforce development policies to address the unprecedented wave of job losses associated with the Covid-19 pandemic, it will be vital to ensure those policies are intentionally targeting racial disparities. The solutions outlined below include recommendations for state and federal action, both of which will be critical components as communities begin the task of adapting to a post-pandemic world.

Chief among these policies should be an investment in data systems and data analysis. It is important to start with data because without accurate information, there is no way for policymakers to set appropriate goals for narrowing equity gaps. Data is also essential for policymakers to gauge the success of their initiatives in addressing inequities. With data, advocates and policymakers can make informed judgments about how effectively workforce and education policies are serving workers of color, and whether policies are mitigating the disproportionate negative impacts experienced by workers of color due to both the pandemic and longstanding structural inequities in American society.

**RECOMMENDATION:** Develop education and workforce data systems capable of tracking program access and outcomes-focused data by race and ethnicity, disaggregated by major subgroup.

In order to measure progress towards closing equity gaps in adult and postsecondary education, workforce training, and employment, states must collect and use information about outcomes and credential attainment, disaggregated by demographic characteristics. Minnesota, for example, has disaggregated performance data on workforce programs by race and ethnicity through a public dashboard located on its Department of Employment and Economic Development website. The dashboard not only tracks data by race, but also by specific immigrant subgroups prevalent within the state, including Hmong and Somali immigrants.
Systems should not only track degree attainment disaggregated by race and gender, but also non-degree credential attainment, including industry certifications, badges, and certificates resulting from for-credit and non-credit programs, licenses, and registered and non-registered apprenticeship certificates. States should convene a diverse array of relevant stakeholders to discuss which types of non-degree credentials are credentials of value so that racial inequities in the attainment of those credentials can be addressed.17

**RECOMMENDATION:** Make educational outcomes data transparent, and use data to address inequities.

States should go beyond simply collecting data to creating a data-driven decision-making culture. In particular, states should use data disaggregated by race to assess education, training, and apprenticeship program completion rates. Where racial differences exist, more data may need to be collected to understand the root cause of these differences. Advocates in Minnesota, for instance, have used the state’s disaggregated data to successfully advocate for specific programs proven to produce exceptionally positive results for people of color.18

On the federal level, Congress should pass the College Transparency Act to allow the Department of Education to collect data on all postsecondary students disaggregated by race, ethnicity, and income level. The College Transparency Act would also mandate the accurate reporting of student outcomes—including enrollment, completion, and post-college success—and would require the development of a user-friendly website to ensure that data are transparent and accessible for students, policymakers, and employers.19 States should similarly make their data transparent through publicly accessible dashboards to help stakeholders to make informed decisions.

**A NOTE ABOUT DATA PRIVACY AND PROTECTION**

Trustworthy, transparent data is a cornerstone of good policymaking and individual decision making, but it is equally imperative that privacy rights are protected. This issue may be especially salient for immigrants and other marginalized communities.

Congress and state policymakers should support data policies that include up-to-date security standards and penalties for illegally obtaining information, prohibitions on collection of sensitive information, and strong limitations on disclosing any information about individuals.

**RECOMMENDATION:** Adopt racial equity goals and develop plans and systems to track progress.

Adopting racial equity goals as part of postsecondary attainment, workforce development, and career and technical education plans helps to focus collective efforts on achieving racial equity instead of perpetuating disparities. States have opportunities to embed such goals within each
of these three types of plans. In each case, goals can be designed to specifically address equity gaps facing immigrants and English language learners of color, in addition to their US-born counterparts.

To date, over forty states have adopted postsecondary attainment goals that define the share of the state population that will need to hold a quality credential beyond high school in the near future. On a national level, achieving these attainment goals is extremely unlikely without increasing the attainment levels of people of color. It is downright impossible in many individual states.

To address these disparities and reach overall attainment goals, states must have good data on credential attainment by race and ethnicity and a goal for closing these gaps. Of the forty-three states with postsecondary attainment goals, thirty states have set goals to close racial equity gaps or improve outcomes for students of color, and twenty-nine states use data to illustrate the extent of racial gaps in college enrollment, persistence, completion, and/or attainment.

States should consider establishing or strengthening their postsecondary attainment goals to specifically target attainment gaps for individuals of color, including immigrants and English learners. Establishing racially-specific goals helps galvanize stakeholders to make specific changes to close these gaps. States like Texas have awarded grants to institutions serving Latinx and Black male students to directly impact their success in securing a certificate or degree.

Some localities have included racial equity goals in their local workforce development plans as a way of motivating action in their communities. For example, Portland, Oregon’s Strategic Plan to Advance Racial Equity, Diversity, and Inclusion aims to advance equity through policy and practice in all aspects of life in the Portland metro, including city workforce training and hiring as well as expanding workforce development to create strong employment pipelines for people of color. Using this plan, Portland enhanced apprenticeships and convened a Workforce Diversity Summit to increase the number of skilled construction tradespeople needed for large projects.

States should also include racial equity goals in their workforce development plans, which are required to be submitted to the federal government under the Workforce Innovation and Opportunity Act (WIOA). For example, Minnesota’s Workforce Development Strategic Plan 2016-2020 has two such goals: reducing “educational, skills training, and employment disparities based on race, disability, disconnected youth or gender”; and building “employer-led industry sector partnerships that expand the talent pipeline to be inclusive of gender, race, and disability to meet industry demands for a skilled workforce.”

Finally, states should also consider incorporating racial equity goals as part of their planning around career and technical education (CTE). The federal Strengthening Career and Technical Education for the 21st Century Act, commonly known as Perkins V, requires states to submit implementation plans to the federal government. States face a host of requirements related to “special populations” in their Perkins planning process.
While the Perkins definition of special populations does not include race, many of the subgroups within the special populations category are disproportionately comprised of people of color, such as English learners. In addition, when states submit their Perkins performance data, they are required to disaggregate it by race and to identify and quantify any achievement gaps between any subgroup and CTE students as a whole. States can build on these federal requirements by adding specific goals for achieving greater racial equity in participant access and outcomes as part of their CTE plans, including accountability measures to ensure that such goals are tracked and evaluated.

**RECOMMENDATION:** Invest in infrastructure, technical assistance, and guidance to support local practice that helps meet equity goals.

Simply implementing race-blind skills training is insufficient to address racial disparities. Instead, policymakers should establish racially specific workforce development goals and plans, and provide training to the frontline workers charged with implementing those plans. Some states and localities have already recognized this issue, and invested in training and technical assistance for workforce development professionals to ensure that their efforts consciously address racial disparities. Going forward, having dedicated funding to advance racial equity efforts is crucial to ensuring that these efforts are prioritized and not abandoned because they compete with other funding obligations.

**RECOMMENDATION:** Issue guidance for local workforce providers and career counselors on serving immigrant jobseekers and workers.

Local workforce development centers are sometimes unclear about the rules for serving immigrants and how best to serve residents born outside the US, especially given the array of immigration statuses and potential language barriers. States such as New York, Michigan, and California have funded navigator positions and provided professional development for staff to improve immigrant access to public workforce services.28 Michigan and California have also provided technical guidance to frontline staff on determining immigrant eligibility for Workforce Innovation and Opportunity Act (WIOA) Title I services.29

An example of career counseling comes from the Office of Global Michigan (OGM), housed within that state’s Department of Labor and Economic Opportunity. OGM offers the Michigan International Talent Solutions (MITS) program for immigrant jobseekers who have credentials from abroad.30 The MITS program uses specially trained workforce staff to provide career coaching and job-placement assistance and offers eligible candidates access to an online English language learning tool and short-term “reskilling” vouchers.

“Having dedicated funding to advance racial equity efforts is crucial to ensuring that these efforts are prioritized and not abandoned because they compete with other funding obligations.”
**RECOMMENDATION:** Invest in upskilling policies, including digital literacy, for adults with foundational skills gaps

Black and Latinx adults are disproportionately likely to lack foundational literacy, numeracy, and digital skills. In particular, 2017 U.S. data from the Organization for Economic Cooperation and Development (OECD) Survey of Adult Skills\(^1\) show that one in three Black adults and nearly one in three Latinx adults score below Level 2 in literacy, compared to just over one in ten White adults. One-third of immigrants score below Level 2 in literacy, compared to just under one-fifth of US-born adults. Similar disparities exist for numeracy: Slightly more than half of Black adults and just under half of Latinx adults score below Level 2 in numeracy, compared to one-fifth of White adults.\(^2\) Roughly 40 percent of immigrants score below Level 2 in numeracy, compared to slightly more than a quarter of US-born adults.

Americans of color face similar gaps in their digital literacy skills, an especially concerning problem given the rapid growth of digital demands in occupations of all kinds and the increased adoption of online learning approaches due to the Covid-19 pandemic.\(^3\) These gaps are particularly acute among immigrant workers and adult English learners.\(^4\)

Foundational skill gaps among American adults reflect in part the longstanding history of under-investment in communities of color through the K-12 education system.\(^5\) A legacy of exclusionary housing policies and lack of neighborhood investment not only disconnects low-income families and people of color from job opportunities,\(^6\) but also contributes to the underfunding of neighborhood K-12 schools, which undermines students’ ability to complete

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**A CASE STUDY IN UPSKILLING INVESTMENT: NEW YORK’S LAGUARDIA COMMUNITY COLLEGE**

New York’s LaGuardia Community College is home to an innovative healthcare career pathways program for English learners. LaGuardia’s Center for Immigrant Education and Training and its Welcome Back Center\(^1\) help immigrants who came to the US with healthcare experience and credentials to build their English and professional skills simultaneously, through an integrated program known as NY-BEST. Intensive eight-month, 16 hour-a-week courses help participants prepare for complex licensing exams in phlebotomy, EKG, or nursing. The program’s success is reflected in its metrics: a 98 percent participant retention rate and 93 percent licensing exam pass rate for Licensed Practical Nurses. In addition, more than 70 percent of NYBEST NCLEX graduates have found permanent employment with family-sustaining wages.\(^2\)

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high school and attend college. In addition, K-12 students of color are more likely to experience disproportionate exclusionary discipline, due in part to subjective teacher referrals and implicit bias. This can interrupt their path to high school completion, putting them at risk of not receiving a high school diploma — the gateway to postsecondary education or, in many cases, an apprenticeship or other form of work-based learning.

Policymakers should address the disproportionate foundational skill needs of people of color by investing in proven models that equip adults with the skills and supports they need to achieve their career goals. For example, states can ensure that there are a variety of on-ramps to postsecondary and workforce training programs, so that people with foundational skills needs are not unnecessarily turned away from such opportunities. The Texas Workforce Commission has tackled this challenge through a multi-pronged initiative led by its Adult Education and Literacy (AEL) program to create career pathways for adults with foundational skills gaps.

Policymakers should also use data to analyze existing upskilling investments for adults with foundational skill needs to help assess program and service gaps. Understanding the current landscape of investments in foundational skills — for both US-born and immigrant workers — is vital to analyzing where gaps in these investments may be disproportionately burdening workers of color. Where gaps in upskilling investments create inequities, policymakers should develop plans to remedy them.

Finally, as state and federal policymakers address the evolving challenges presented by the Covid-19 pandemic, it is important to make targeted investments in digital skill-building for workers of color. These investments should include technical assistance to build capacity among education and workforce training providers to provide digital literacy programs and services, as well as support for workers themselves to achieve equity in access to broadband internet, digital devices, and digital literacy learning opportunities.

**RECOMMENDATION:** Increase investment in vocational and technical English language classes and Integrated Education and Training (IET) programs

Public investment in English language programs for adults meets only a small fraction of the need. Funding for the federal Adult Education and Family Literacy Act, now known as Title II of the Workforce Innovation and Opportunity Act, has fallen by 17 percent in the last two decades, and now reaches fewer than 1.5 million of the 19 million English learners in the US.

Moreover, classes that provide basic or “survival” English skills or English for academic purposes receive more public funding than classes that are focused on technical or vocational English. While basic skills and academic English are very important, the lack of proportionate investment in technical and vocational English skills can prevent workers who already have a survival job and basic language ability from acquiring the skills and credentials they need to advance into higher-wage, middle-skill jobs.

IET programs are a proven model that provides instruction in foundational skills alongside occupational or industry-specific technical skills. At the federal level, policymakers should
increase investment in key legislation that supports English language acquisition and IET programs, such as Title II of the Workforce Innovation and Opportunity Act. Congress should also consider how the upcoming reauthorization of the Higher Education Act can ensure adult learners with foundational skills needs can have access to the supports they need to succeed in upskilling opportunities, such as through the proposed Gateway to Careers Act.

State policymakers should also increase investment in adult education programs, including vocational and technical English classes as well as IET. States should also consider how they can use state investments and/or federal WIOA Title II state leadership funds to provide technical assistance and professional development to assist local providers in designing and implementing effective vocational ESL and IET models.

**RECOMMENDATION:** Provide tuition equity and financial aid for immigrants not covered by existing financial aid programs.

Paying for postsecondary education is a challenge for workers of all backgrounds. For people who were not born in the United States, the challenge is magnified due to restrictive policies at both the federal and state levels.

To be eligible for federal student financial aid (either grants or loans), people born outside the US must either have become naturalized US citizens, or be “eligible noncitizens” — typically legal permanent residents, also known as green-card holders. The remainder of immigrants are not eligible for federal financial aid. This includes millions of people who have Deferred Action for Childhood Arrivals (DACA) or Temporary Protected Status (TPS) or are undocumented, among others. Immigrants who are not eligible for federal student financial aid are overwhelmingly people of color.

The federal government should enact legislation that would provide a pathway for individuals with DACA, TPS, and undocumented status to achieve permanent legal status and citizenship, and thus access to federal financial aid. In the short term, the US Department of Education should reverse its earlier guidance on emergency aid to students as part of the CARES Act pandemic response legislation, and allow institutes of higher education to provide emergency aid to individuals who are not eligible for traditional federal student aid.

In addition to federal restrictions, most states forbid people with DACA, TPS, or undocumented status from accessing state-funded financial aid. A handful of states have also implemented legislation or other policies that forbid undocumented students from accessing state public higher education at all.

Eleven states do allow undocumented students who meet certain criteria to access state financial aid. To advance racial equity, states outside of these eleven should replicate their policies.
PERMANENT PROTECTIONS AND A SKILLS-BASED PATH TO CITIZENSHIP FOR DREAMERS

Congress should pass legislation to provide permanent protections and a skills-based path to citizenship for Dreamers. There are roughly 2 million young undocumented immigrants who came to the US as children, including 700,000 who have temporary protection via the Deferred Action for Childhood Arrivals (DACA) program. Congress should pass legislation that provides these young people with a path to citizenship and recognize the role they can play in meeting the demand for workers who have postsecondary credentials, including those that require skills training short of a bachelor’s degree.

Legislation such as the Dream and Promise Act (HR 6) would address these issues by allowing young people to obtain citizenship after earning one of several eligible types of postsecondary credentials, including many at the middle-skill level. To facilitate Dreamers’ ability to earn such credentials, Congress should also remove outdated restrictions on states’ ability to offer in-state tuition to undocumented immigrants and should allow Dreamers to become eligible for federal student financial aid earlier in their path to citizenship.

In addition, states should establish tuition equity policies that ensure that undocumented residents of their state are not burdened by paying out-of-state tuition rates at state colleges and universities. More than twenty states have already enacted such policies, guaranteeing that undocumented students can pay the same in-state tuition rates as their documented peers. (These policies often require the student to have lived in the state for a period of time, to have graduated from high school in that state, and to promise to apply for permanent immigration legal status as soon as they are eligible.)

Both types of policies — tuition equity and access to state financial aid — should also be responsive to the issues facing mixed-status families. In such families, individuals may have different immigration statuses from each other, such as when a teenager is a US citizen and a parent is undocumented. States should be cognizant of how being part of a mixed status family can complicate students’ attempts to apply for financial aid and should design policies that are inclusive of such families.


For details, see NSC’s fact sheets for the U.S. and each of the 50 states plus D.C. and Puerto Rico: https://www.nationalskillscoalition.org/state-policy/fact-sheets.


This fact sheet follows standard practice in defining English learners as those who speak English less than “very well.”

Migration Policy Institute, Immigration Data Hub (United States). MPI Migration Policy Institute tabulations of the U.S. Census Bureau American Community Survey (ACS) 2017 data, https://www.migrationpolicy.org/data/state-profiles/state/workforce/US.


The overwhelming majority of English learners in the U.S. are immigrants and most immigrants are people of color. Jie Zong, Jeanne Batalova, and Jeffrey Hallock, “Frequently Requested Statistics on Immigrants and Immigration,” Migration Policy Institute, February 8, 2018, https://www.migrationpolicy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states-7. However, it is important to note that not all immigrants are English learners; people who come from West African countries such as Liberia, Nigeria, Ghana, and across the English-speaking Caribbean, among other countries, often speak English as their primary or even only language. Similarly, not all English learners are people of color; the U.S. is also home to English learners who are immigrants from Eastern and Western European countries (or other nations) and identify as White.


Municipal-level action will also be crucial; many of the policies recommended here could also be adapted for implementation at the local level.

In addition to the policy recommendations outlined below, states can also analyze existing data in new ways, such as by examining Unemployment Insurance claims to better understand the demographics and previous occupations of newly unemployed individuals in order to better target programs and services.


Minneapolis Saint Paul Regional Workforce Innovation Network, The Path to Success: Career Pathways are an innovative approach to job training that show great promise for addressing both racial disparities and the looming shortages of skilled labor in Minnesota, MSPWin, May 2016, http://mspwin.org/wp-content/uploads/2016/05/MSPWin-Story2.pdf.


Ibid.


The Workforce Innovation and Opportunity Act is our nation's primary workforce legislation. To receive funding through the legislation, governors are required to designate local workforce development areas and elected officials within those areas are required to appoint members to local workforce development boards. The local boards are required to establish plans with specific components, including a description of the local board’s strategic vision and goals for preparing and educating a skilled workforce. (Workforce Innovation and Opportunity Act, H.R. 803, 2014.)


30 Learn more about the MITS program on the OGM website: https://www.michigan.org/

31 This dataset is also known as the Program for the International Assessment of Adult Competencies, or PIAAC. Learn more at www.piaacgateway.com, and access US data at: https://nces.ed.gov/surveys/piaac/current_results.asp


34 Ibid.

35 While some immigrants grew up abroad and came to the United States as adults, other immigrants arrived in the US as children and have grown up under the US educational system.


40 For further detail on these and other digital literacy policy recommendations, please see Digital Skills for an Inclusive Economic Recovery.

41 Budget numbers are in inflation-adjusted terms. Of the 1.5 million adults in WIOA Title II-funded classes, approximately 600,000 are in English language classes, while others are in Adult Basic Education or Adult Secondary Education (high school equivalency) classes. Katie Spiker, “Senate Advances FY 2019 Labor-HHS Spending Bill,” September 19, 2018, https://www.nationalskillscoalition.org/news/blog/senate-advances-fy-2019-spending-bill-and-americas-workforce-we-cant-compete-if-we-cut-1.pdf.

42 Passage of the Workforce Innovation and Opportunity Act in 2014 began to address this issue in a limited way, with states now required to spend at least a small portion of their adult education funding on Integrated Education and Training approaches that blend basic skills with technical instruction. However, IET programs serve a broad range of learners with basic skill gaps (English language, reading, or math) and the overall number of participants in IET programs remains comparatively tiny, representing less than 4 percent of all WIOA Title II participants in Program Year 2018-19, according to data from the US Department of Education’s National Reporting System.


45 The eligible noncitizen category also includes a small handful of other types of immigrants, primarily those in humanitarian categories such as refugees or domestic violence victims. U.S. Department of Education, Non-U.S. Citizens, Federal Student Aid, https://studentaid.ed.gov/sa/eligibility/non-us-citizens.


47 See: https://www2.ed.gov/about/offices/list/ope/heerfstudentfaqs.pdf

48 "Basic Facts about In-State Tuition for Undocumented Immigrant Students," National Immigration Law Center, June 1, 2018, https://www.nilc.org/issues/education/basic-facts-instate/. Since this publication was issued, New York has passed legislation to open up state financial aid for Dreamers.


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