Investing in the Human Capital of Immigrants, Strengthening Regional Economies

Audrey Singer

“Metropolitan areas have an opportunity to build the capacity of their workforce from within by investing in the human capital of immigrant residents.”

Coming out of the Great Recession, slow economic recovery has plagued U.S. communities. Cities and regions are seeking strategies that will grow jobs in the short term and improve standards of living over the long term. This paper examines how geographic regions can invest in the human capital and economic advancement of immigrants who are already living in their jurisdictions, to help boost short- and long-term growth. It highlights programs and partnerships that work to unlock skills of immigrants with foreign credentials and to build skills of immigrants who could advance in the market with targeted programs.

Introduction

A mid the sluggish economic recovery, cities and regions are seeking strategies that will grow jobs in the short term and improve standards of living over the long term. They can achieve economic growth in one of two ways—expanding the availability of inputs (attracting more land, labor, and capital); or boosting productivity, the amount of output that the economy produces for a given level of input.

Increasing workers’ human capital—education and skills training—is a critical pathway toward improving productivity and economic growth. It also advances innovation and the use of technology, which in turn increases the demand for more educated workers. Many experts agree that the long-run competitiveness of the American economy will hinge on the ability of its workforce to make continued gains in education and skills.

The Great Recession and the subsequent slow recovery have put the demand for education into even greater relief. A recent analysis found that advertised job openings within major metro areas require more education than all existing jobs, and more education than the average adult has attained within those places. There are fewer openings for low-skilled workers, who continue to have much higher unemployment rates than those with post-secondary training or degrees, suggesting that “skilling up” more workers could increase employment.

Experts also foresee rising demand for education and skills over time. One estimate projects that by 2018 nearly two-thirds of all job openings will require workers with at least some post-secondary education. Much of this increase comes not from a shift in available occupations, but from “upskilling” in occupations that previously did not require those credentials. Shortages of skilled workers will be exacerbated by the retirement of the baby boomers over the next few decades.
Amid rising demand for skilled workers and the aging of the U.S. workforce, immigrants are an increasingly important source of labor. The share of the workforce that is foreign-born has more than tripled, from nearly 5 percent in 1970 to over 16 percent in 2010. If the children of immigrants are included, the share of the labor force that is either first or second-generation American climbs to 25 percent. Virtually all of the growth in the U.S. labor force over the next 40 years is projected to come from immigrants and their children, so it is essential for the health of the U.S. economy that they are well positioned to fill skilled jobs.

Many professional immigrants, especially those trained abroad, must overcome barriers to the U.S. labor market, including navigating the job search in a new market, having their foreign-earned credentials recognized, completing complex licensing or certification requirements, and improving their English skills. Other immigrants, with the benefit of targeted training programs, can build their skills and move into jobs in high demand for the benefit of local economies.

Metropolitan areas are on the front lines of the economic integration of immigrants. This paper examines how geographic regions can invest in the human capital and economic advancement of immigrants who are already living in their jurisdictions, to help boost short- and long-term growth, highlighting initiatives from communities across the country.

Background on Immigrant Human Capital
Nationally, immigrants and natives have different educational profiles. Immigrants are much more likely to lack a high school diploma than the native born, but they hold bachelor’s degrees at similar rates. A smaller share of immigrants than native-born individuals have a high school diploma or an associate’s degree or some post-secondary training, but they still comprise the largest skill group (Table 1).

English language proficiency, a fundamental skill for the U.S. labor market, is a major factor for workforce integration at all skill levels. English language ability is also tied to how long immigrants have been in the United States. As Table 1 shows, the vast majority of low-skilled immigrants have limited English proficiency; the share reaches 90 percent for those who arrived within the past 10 years. Even among mid- and high-skilled immigrants, the share not proficient in English is fairly high (51 percent and 32 percent respectively) and even higher for recent arrivals (67 percent for mid-skilled and 36 percent for high-skilled) than for those who have lived in the United States for more than ten years.

Immigrant workers are more likely to be underemployed than similarly educated native-born workers, especially those with post-secondary education. Recent estimates from just prior to the recession show that immigrant workers with at least a bachelor’s degree are one-third more likely to be overqualified for their jobs; 49 percent as compared with 36 percent of U.S.-born workers. Among immigrants who arrived in the past 10 years the rate is even higher: Nearly one-half are more likely to be overqualified than their native-born counterparts (Figure 1).

Table 1. Immigrant and Native Working Age Population (25-64) by Education Level and English Proficiency, 2010

<table>
<thead>
<tr>
<th></th>
<th>High-Skilled</th>
<th>Mid-Skilled</th>
<th>Low-Skilled</th>
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<tbody>
<tr>
<td></td>
<td>Bachelor’s Degree or Higher</td>
<td>High School Graduate, Some College or Associate’s Degree</td>
<td>Less than High School Graduate</td>
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<tr>
<td>Native Born</td>
<td>30%</td>
<td>61%</td>
<td>9%</td>
</tr>
<tr>
<td>Foreign Born</td>
<td>28%</td>
<td>42%</td>
<td>30%</td>
</tr>
<tr>
<td>Percent with Limited English Proficiency</td>
<td>26%</td>
<td>51%</td>
<td>84%</td>
</tr>
<tr>
<td>Recent Arrivals (2000 or after)</td>
<td>32%</td>
<td>38%</td>
<td>30%</td>
</tr>
<tr>
<td>Percent with Limited English Proficiency</td>
<td>36%</td>
<td>67%</td>
<td>90%</td>
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Note: Limited English Proficiency refers to those who indicated that they speak English “less than very well.”
Source: Brookings analysis of 2010 ACS 1-year estimates; microdata, accessed via IPUMS.org
Reasons for this disparity lie in the particular barriers to the job market that immigrants face, especially newcomers. On the high-skilled end, immigrants often lack social networks to connect them with job openings, are unfamiliar with the job application and interviewing processes in the United States, and have credentials which are often unrecognizable to U.S. employers. For those educated outside of the United States it is especially challenging to find fitting jobs, and many start in “survival jobs” like the engineer who drives a taxi or the human resources director who is a nanny. Many lower- or middle-skilled immigrants work in low-income jobs, lack strong English language skills, and may not be knowledgeable about the training needed to get on career paths that offer upward mobility. These conditions decrease the likelihood of achieving a post-secondary credential. The inability of immigrants to use skills they already have or gain skills they need limits their progress and hinders regional growth.

Moving some of these immigrants into jobs they were trained for or putting them on career tracks to fill regional shortages of workers, for example, in engineering, healthcare support, and information technology would accelerate job mobility, likely increasing earnings and boosting local revenue. An additional asset is that some of these immigrants provide connections to broader immigrant communities, specifically industries where linguistic and cultural linkages are important, such as healthcare provision and professional services.

While the underutilization of skills has not garnered much interest as compared with other issues high on the immigration agenda, such as illegal immigration and border security, there is new interest in adjusting immigration policy to better suit the needs of the changing U.S. economy toward high-skilled immigration. Less discussed is the opportunity to take advantage of the skills of incumbent immigrants, by investing in their potential.

The approaches to investing in the human capital of immigrants discussed in this paper share the characteristic that they are intentionally aimed at the resident immigrant workforce. They fall into two broad groupings, with some overlap in objectives. The first set of programs is exclusively geared toward high-skilled immigrant professionals who were trained abroad and who face a number of formal and cultural obstacles to getting jobs commensurate with their skills. The second set of programs target middle-skilled immigrants—but also reach native workers—who are in a good position to advance into better jobs after appropriate training.

If strategies to unlock or build skills of immigrants are explicit goals, how can localities achieve them? Following is an examination of approaches for regions and individual jurisdictions. It highlights programs and partnerships that work to unlock skills of immigrants with foreign credentials and to build skills of immigrants who could advance in the market with targeted programs. Investing in immigrants already here—this is not a suggestion to bring additional immigrants into the United States—can help local businesses and economies, as well as immigrants, their families, and the communities in which they live.

### Figure 1. Overqualified High-Skilled Workers in the United States, 2006-2008

![Figure 1. Overqualified High-Skilled Workers in the United States, 2006-2008](source: Brookings analysis of 2006-2008 estimates from the American Community Survey (ACS). Overqualification is measured by comparing workers’ level of education compared to national occupation-specific means using data from the ACS. A worker is considered overqualified if their educational attainment is one or more standard deviations above the mean education for their occupation. Newly arrived immigrants are those who came to live in the U.S. 10 or fewer years ago.)
Unlocking the Skills of Professionally Trained Immigrants with Foreign Credentials

Metropolitan areas are home to many immigrants who were educated and gained their experience abroad in medical professions, engineering, information technology, and other careers who could contribute to local economies. However, immigrants who acquired their education outside the United States often have difficulties finding jobs in their field of specialization in the first several years after arrival. Some are never able to overcome certain obstacles and instead find a pathway to employment in a different field, or they try self-employment. But many are unfamiliar with the job search process in the United States, including interviewing techniques and preparing American-style résumés. Some lack the networks that those educated in U.S. schools have that provide greater access to potential jobs, and others may face discrimination by employers regarding their foreign credentials and work experience. In certain professions, licensing requirements, which are set at the state level, are an additional hurdle. All of these obstacles can be even harder to overcome without proficiency in English.14

Several innovative programs exist or are coming on line in various communities across the country that have identified untapped immigrant professionals and are working to assist these workers in transferring their skills to the U.S. market. Upwardly Global, currently with offices in Chicago, San Francisco, and New York, works with immigrants to rebuild skills and provides mentoring and coaching to improve their chances of success in navigating the job search process. This nonprofit organization works directly with employers to open doors for foreign-trained immigrants. Upwardly Global approaches employers (both large and small) by educating them about the potential pool of employees, including information about the U.S. visa system and how to evaluate foreign credentials. Their employee engagement program uses volunteers from U.S. companies to serve as peer mentors to help participants with effective interviewing techniques and other experiential knowledge. They also have placement services, where they screen and present candidates for hire in partnership with businesses.15 Upwardly Global has trained more than 2,800 immigrant professionals from 127 countries since 2000.

With pending demographic changes of the U.S. workforce, and greater globalization of business practices, more companies are likely to be looking toward workers with international qualifications. A unique aspect of Upwardly Global’s agenda is to work with employers to show them the value of cultivating this group of immigrants as a distinctive resource, while at the same time increasing their capacity to hire such professionals.

Demand for healthcare professionals has been expanding and is projected to have large growth during the next decade. According to the Bureau of Labor Statistics, the fastest job growth through 2020 is expected in the healthcare, personal care, and community and social service occupations. The healthcare sector includes highly skilled health practitioners and technicians (doctors, nurses, medical records technicians, emergency medical technicians, to name a few), and also lower skilled healthcare support occupations (home health aides, nursing aides, physical therapy assistants and the like).

The Welcome Back Initiative (WBI), in 10 locations across the country, works exclusively with professionally-trained immigrants in the healthcare sector.16 One distinguishing goal is to connect these professionals with communities that are in need of healthcare workers with compatible language and cultural skills, many of which are underserved. WBI works with immigrants to help them retrain or obtain the necessary credentials and licenses to practice in the United States, and also to market their skills appropriately and effectively. The WBI has continuously tracked the progress of participants since its inception in 2001 and has served 11,000 immigrant health professionals with case management, help in obtaining the necessary credentials and licenses to practice in the United States, and in marketing their skills appropriately and effectively.

Some immigrants may not have proficiency in English, especially in the subject matter in their field, despite their years of formal education. The Welcome Back Initiative, through its vocational English as a Second Language (VESL) program, English Health Train, works to help professionally-trained immigrants improve their English while gaining the appropriate technical vocabulary, learning how to communicate with patients, and understanding healthcare workplace culture. This curriculum, which started in the San Francisco center, has since been adopted in several other places. The WBI has continuously tracked the progress of participants since its inception in 2001 and has served 11,000 immigrant health professionals with case management, help in obtaining the necessary credentials and licenses to practice in the United States, and in marketing their skills appropriately and effectively.

The majority of the Welcome Back Centers are housed in community colleges, and each is locally funded and managed. However, one WBI, the Suburban Maryland Welcome Back Center, is run by the Montgomery County Department of Health and Human Services. Each location serves a different pool
of workers but the clients share similar obstacles: lack of familiarity with the U.S. health care system, limited English language proficiency, modest financial resources and time, and unrecognized or discounted academic credit earned at foreign educational institutions. This kind of “franchise” model is flexible and independent, but with the same goals across each center.

In order to utilize their skills and incorporate into the economy, immigrants need to be familiar with several different aspects of the U.S. labor market. Immigrants must understand how their foreign-earned credentials stack up against U.S.-trained workers to ascertain the competition they face for different jobs. It is also crucial that immigrants understand what types of credentials are not only required but also desired by employers in their fields of interest.17

In regulated fields such as accounting, medicine, engineering, and pharmacy, state-issued licenses are required. Those entering these professions (both native and immigrant workers) must navigate through often complicated processes and expensive fees. Several organizations offer very detailed guides on re-licensing that are state- and occupation-specific.18 Immigrants with foreign training need to have their credentials accredited to make these applications.

In addition, employers may overlook candidates because they do not recognize their credentials. World Education Services (WES) is a non-profit organization that validates foreign credentials for job-seekers (and students) as well as for employers and licensing boards. Their Global Talent Bridge program works with community organizations and others to provide online resources, seminars, and guidance on licensing for information technology, engineering, accounting and other professionals.19 Both Upwardly Global and the Welcome Back Initiative, work with WES to get their credentials assessed and recognized by employers.

Together, Upwardly Global, the Welcome Back Initiative, World Education Services, along with two other organizations, the Welcoming Center for New Pennsylvanians and the Community College Consortium for Immigrant Education comprise the coalition known as IMPRINT. IMPRINT’s mission is to work with business, government, higher education, and other partners to raise awareness about the talents and contributions of immigrant professionals living in the United States and to streamline the complexities of professional licensing and re-credentialing of skilled workers to integrate them better into the U.S. workforce.20

New York City is a major immigrant gateway with a mayor who has been very focused on immigration issues, and so it is not surprising that an innovative approach to investing in the human capital of immigrants is happening there. The New York City Economic Development Corporation (NYCEDC) is set to launch its Immigrant Bridge Program, which has two major components designed to move immigrants into higher skilled positions. One program is designed to reduce barriers for underemployed internationally-trained immigrants by providing credential assessment, training in soft and hard skills, referrals to internships and job search support. The second program is more notable and pioneering. It will offer low-interest microloans to immigrants to fund tuition and training, exam fees and course materials, and other associated costs of educational training to retrain or upskill in their fields. These joint programs will enable immigrants to use the skills they already have, or support the retraining or re-credentialing they need. The NYCEDC expects to lend to approximately 150 people during the first 18 months with an average loan of $5,000.

Building the Skills of Immigrants for Occupational Advancement

In various metropolitan areas, regional assessments of employer needs have identified shortages in specific industries and occupations, and training programs have been formed around these shortages. Many immigrant adults are currently employed in low-skilled positions and are unable to advance due to their basic education and English language deficits. Various programs offer entry to desirable jobs with higher wages and clear career pathways, but which may otherwise be unattainable without building basic skills. Immigrants who join these programs are similar to other nontraditional students, in that they may be older and may hold several jobs, but in addition they may have limited English proficiency and lack job search skills, like their higher skilled counterparts do. Thus, programs that address students’ ESL or general education needs before or alongside their professional training, and provide sufficient support to ensure that students finish their degree or certificate programs hold particular promise.21
Forward-thinking metropolitan areas with large immigrant populations have created pipelines between technical schools and community colleges, employers, and students to align training and projected needs for local economies. Many also emphasize the benefits of providing general education and vocational training simultaneously. These programs not only enhance the learning environment for immigrants, but enable them to complete post-secondary credentials and enter stable careers by offering them at an accelerated pace.

Many of these programs are not exclusively for immigrants but have components designed for the particular needs of immigrants. For example, an assessment conducted by Northern Virginia Health Force, a partnership of stakeholders and industry leaders, revealed a shortage of healthcare administrators in the region. This finding prompted a job training program, Training Futures, to update its curriculum to focus on healthcare, in an effort to help meet this need.

Training Futures is operated through a partnership between Northern Virginia Family Service and Northern Virginia Community College (NOVA). It is an innovative program designed to prepare workers for entry-level administrative jobs in health care offices. Between 2007 and 2010, most participants in the program were recent immigrants, and 74 percent of them were non-native English speakers. The program placed 85 percent of students in a variety of entry-level administrative office positions.

The program provides a combination of coursework in general skills and college preparation as well as more targeted vocational training in healthcare and administration. In addition, Training Futures’ staff works with students extensively on interviewing and other professionalization skills to prepare them for the U.S. job market. The vast majority of students also earned college credits at NOVA through the program, and an increasing number of Training Futures graduates are continuing on to other programs at the community college.

Another example of a partnership between an educational institution and a local nonprofit is that of Shoreline Community College and the Workforce Development Council of Seattle-King County. This partnership identified a local job shortage of automobile service workers, as well as a training program these jobs required. Even during the recession, new automotive service technicians earned their certificates and landed jobs through the Automotive General Services Technician program, which trains mostly low-income, immigrant, and first-time college students for their first jobs in the automobile service industry.

Additional comprehensive services and financial support are available; a “Career Advancement Navigator” develops and maintains relationships with employers, arranges internships, assists with other educational opportunities, and helps students find positions. Perhaps most importantly, this certificate program is part of Washington state’s Integrated Basic Education Skills Training program (I-BEST), one of the most well-known programs that combines skills training with basic education and language training to accelerate student progress through the program.

In Washington state, across 34 community and technical colleges, the I-BEST Program was designed to advance low-skilled adults into careers at a faster pace than traditional programs. I-BEST pairs workforce training and ESL/Adult Basic Education (ABE) to address both at the same time. The instruction is designed as a co-teaching model whereby a professional or technical instructor and a basic skills instructor jointly organize the course and evaluate students. In this program too, the focus is on high-demand occupations to maximize job placement. Shoreline offers three I-BEST certificate programs in addition to the Automotive General Service Technician program: computer numerical control machinist, office technician, and certified nursing assistant.

Another effort to accelerate basic education deficits by combining language instruction with vocational skills is Alamo Colleges’ Exploratory and Skills Enhancement program (Career EASE) in San Antonio. A kind of pre-I-BEST course, Career EASE is industry-specific (either health services or green jobs), offering vocational training for students who may have been out of school for a long period of time to hone their academic skills, explore their vocational interests, and ultimately prepare to enter more rigorous vocational training. After the Career EASE program, students are more aware of their career interests and more prepared for focused training. They then embark on technical training of the I-BEST program, which has been adapted from Washington State to the Alamo Colleges system.

Montgomery College in Maryland also attempts to move immigrant and refugee students from basic education into vocational training at a faster pace than traditional ABE or ESL programs. The
Career Connections program, funded by the U.S. Department of Education, combines vocational training in two industries in high demand—healthcare and building trades—with English language training and general academic and professional preparation. Students exit the program with enhanced basic academic as well as career skills and targeted English language training, the beginning of a potential career path in a growing trade.

Some programs are highly tailored to the needs of immigrant populations that may face more complicated labor market barriers. Refugees, in particular, come to the United States with a wide variety of experiences and educational backgrounds. Miami Dade College has invested in its diverse refugee and asylee population by offering vocation-specific English language training through its Refugee/Entrant Vocational Educational Services Training (REVEST) program, which is funded by the Office of Refugee Resettlement, and the Florida Department of Children and Families.

Students who participate in REVEST become sufficiently prepared for state board certifications in a variety of allied health fields. They can earn state board certification in fields leading to positions such as medical assistant, medical billing coder, pharmacy technician, massage therapist, and practical nurse. REVEST supports this academic preparation with a variety of social services that help facilitate participants’ transition to the United States. Counselors advise students over the long-term about their academic and professional decisions, evaluate foreign credentials, cover some of the costs of childcare and transportation, and offer translation services.

Manufacturing employers may be particularly eager to hire immigrants, but may find that those workers lack English language and training supports that could promote better communication and higher productivity. Research conducted by the Manufacturing Institute of the National Association of Manufacturers and Jobs for the Future identified exemplary programs that both train workers in technical skills and provide English language training. Firms that have implemented these types of programs have experienced increased productivity, profitability and employee morale.

Portland Community College, in partnership with the Oregon Manufacturing Extension Partnership (OMEP) and the Northwest High Performance Enterprise Consortium, has helped make “lean” (high performance) manufacturing a statewide priority and, along with it, “lean” onsite ESL training at 60 manufacturing firms. The firms have reported increased productivity and savings as well as an improvement in company culture whereby employees more actively participate in company programs. A similar partnership between Truman College, a City College of Chicago, and the Admiral Tool and Manufacturing Company increased teamwork and worker motivation. Changes in Admiral Tool’s manufacturing processes have required new training and hiring practices and the company’s new approach has formalized what was an informal hiring and training process to one that includes skill assessment, job skills training, skill standards and certification, and lean manufacturing training.

Another partner is the Instituto Del Progreso Latino which runs a bilingual manufacturing bridge program for Spanish- and Polish-speaking workers. Eighty-five percent of workers at Admiral Tools were Spanish speaking, so an investment in this population’s English skills had an immediate impact on the company’s operations.

These programs achieve high rates of participation by offering these innovative basic skills and ESL programs on-site during shift hours, and by offering tangible benefits to workers for participating in them. Workers integrate this training into their daily routine, skills classes are applied to a context they are familiar with, and the skills they gain enable workers to take on more responsibility and be promoted within the company.

These programs also directly benefit employers: They are designed to give workers the skills demanded by the business and facilitate communication and cooperation among workers. Although many of these programs enhance basic skills, they do so in an applied context and teach company-specific skills. As with vocational ESL, many of the skills workers acquire are unique to their industry and company—they simply hone their basic language and math skills during this training. Due to the proprietary nature of this skills training, companies not only create a more educated workforce but also groom workers who are more likely to stay with the company over the long term.
Conclusion

Metropolitan areas have an opportunity to build the capacity of their workforce from within by investing in the human capital of immigrant residents. Employers in partnership with educational institutions can invest in the training of workers—both immigrant and native—by targeting sectors with shortages of trained workers. They can also help to unlock the potential of highly skilled professional immigrants, through supporting programs that lift barriers these immigrants face.

Many of the programs highlighted in this paper are run by non-profits or partnerships between non-profits and educational institutions. Community colleges play a prominent role. Not only are these colleges affordable access points for training, but also many have proactive agendas to provide education for immigrants and their children. Although some of the programs receive funding from states or municipalities (either direct or indirect), the benefits ultimately accrue to regional economies through increased worker productivity and earnings.

It is not a coincidence that many of these programs are relatively small-scale and were developed in places with well-established immigrant populations, like New York, San Francisco and Chicago, or in immigrant-rich communities along the Southwestern border. How easily replicated they are across localities depends on the mix of key leaders and institutions as well as funding sources. However, the expansion of some of the programs outlined in this paper bode well if not for scaling up, for replication across communities on a modest scale.

Many of the programs that help workers build skills and that create career pathways are reaching both native and immigrant workers, expanding the supply of skilled labor. Organizations that are trying to unlock skills of professionally trained immigrants are working in fields with high demands, even shortages, of qualified workers. Regional economies matter, but state and local governments, educational institutions, nonprofits, and civic and community leaders all play a role in how immigrants integrate into regional labor markets. Ultimately, human capital is the most important ingredient for long-run regional economic prosperity, and efforts to augment human capital must include immigrants and take account of their particular assets and challenges.
Endnotes


4. The Georgetown University Center on Education and the Workforce projects that by 2018, there will be nearly 47 million job openings in the United States—either new positions or replacements for those retiring. Of these jobs, 62 percent will require workers with at least some post-secondary education. The remaining 38 percent would require a high school degree or less. In addition, these researchers estimate that the United States will need an additional 3 million workers with associate’s degrees or higher and 5 million workers with technical certificates and credentials, a rate that we currently are not matching. See Anthony P. Carnevale, Nicole Smith and Jeff Strohl, Help Wanted: Projections of Jobs and Education Requirements through 2018, (Washington: Georgetown University Center on Education and the Workforce, 2010).


11. Brookings analysis of 2006-2008 estimates from the American Community Survey (ACS). Overqualification is measured by comparing workers’ level of education compared to national occupation-specific means using data from the ACS. A worker is considered overqualified if their educational attainment is one or more standard deviations above the mean education for their occupation. In addition, Batalova and Fix (2008) estimated that in pre-recession 2006, one out of every five college-educated immigrants is either underemployed in low-skilled jobs or unemployed. See Jeanne Batalova and Michael Fix, “Uneven Progress: The Employment Pathways of Skilled Immigrants in the United States,” (Washington: Migration Policy Institute, 2008).


13. Recent proposals such as STAPLE Act, the INVEST Act, and more recently the STAR Act, SMART Jobs Act, and the Start-up Act 2.0, all slightly different, are attempts to open the door for permanent residency to high-skilled immigrants.


26. http://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/adultbe.html#mc

27. http://www.mdc.edu/wolfson/administration/revest/default.asp


Acknowledgments

The author is grateful to a number of people who helped shape this paper through helpful comments and criticisms of earlier drafts, including Alan Berube, Mark Muro, Martha Ross and Suzette Brooks Masters. Others who provided much appreciated comments and assistance include Camille Fisher, Ellen Campbell, Jill Wilson, Nicole Svajlenka, Courtney Pitman, Michael Fix, Matt Hall, and Flavia Jimenez. Thanks to David Jackson for editing the report.

The Metropolitan Policy Program at Brookings thanks the John D. and Catherine T. MacArthur Foundation, the George Gund Foundation, the F.B. Heron Foundation, and the Heinz Endowments for their general support of the program, as well as the members of the Metropolitan Leadership Council.

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