

GAO

Report to the Ranking Member,
Committee on Homeland Security,
House of Representatives

December 2011

IMMIGRANT INTEGRATION

U.S. Citizenship and Immigration Services Could Better Assess Its Grant Program

U.S. Government Accountability Office

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Highlights of [GAO-12-274](#), a report to the Ranking Member, Committee on Homeland Security, House of Representatives

Why GAO Did This Study

In 2009, about 39 million foreign-born people lived in the United States. Immigrant integration is generally described as a process that helps immigrants achieve self-sufficiency, political and civic involvement, and social inclusion. The Department of Homeland Security's (DHS) U.S. Citizenship and Immigration Services (USCIS) is responsible for a key activity that fosters political and civic involvement—the naturalization and citizenship process. USCIS's Office of Citizenship (OoC) supports this process mainly through grants to immigrant-serving entities, but also with outreach activities and education materials. Other governmental and nongovernmental entities play a role in immigrant integration as well. GAO was asked to determine (1) the steps USCIS has taken to implement its integration programs and the extent to which it has assessed its grant program in particular, and (2) what federal mechanism exists to coordinate integration efforts. Among other things, GAO examined documentation on mission objectives and performance measures on immigrant integration and conducted interviews with officials in a nongeneralizable sample of cities and community-based organizations as well as senior USCIS officials about their immigrant integration efforts.

What GAO Recommends

GAO recommends that USCIS set interim milestones for an internal and external evaluation of its immigrant integration grant program, to the extent that it receives fiscal years 2012 and 2013 appropriations for the program. DHS concurred with our recommendation.

View [GAO-12-274](#). For more information, contact Richard M. Stana at (202) 512-8777 or stana@gao.gov.

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What GAO Found

USCIS has implemented immigrant integration efforts through outreach activities, educational materials, and a grant program, and established various measures for assessing its grant program, but has not yet set interim milestones for planned evaluations of the program. From 2008 to 2011, OoC reported conducting more than 300 significant outreach events to promote citizenship awareness and civic integration. Further, nearly half of OoC's funding over the past 3 fiscal years—about \$19.8 million—was spent on grants aimed at preparing immigrants for the naturalization process. The grants were made to a myriad of governmental and nongovernmental organizations, including public school systems and community and faith-based organizations. OoC has established various measures for assessing grantees' performance under its grant program. These measures include, for example, the number of participants enrolled in grantees' citizenship instruction and naturalization preparation programs, the number of participants who passed their naturalization examinations, and the proportion of participants who received grantees' services and self-reported that they naturalized during the year of the grant program. However, USCIS has identified inherent limitations with these measures, such as that its data were incomplete in part because data were self-reported by program participants, and not all program participants reported to grantees whether they passed the naturalization examination and naturalized. In January 2011, USCIS drafted a statement of work for a contractor to develop an evaluation plan that would allow USCIS to measure the grant program's performance and long-term impact, and this may help address these limitations. According to USCIS, it did not complete this statement of work or award a contract for an evaluation plan because, at that time, the agency was uncertain whether it would receive appropriations in fiscal year 2011 to continue the grant program, and the program has no authorizing statute. The final fiscal year 2011 law, enacted in April 2011, did allow the use of appropriations to fund the grant program, but USCIS did not proceed with developing an evaluation plan. In November 2011, USCIS reported that it plans to conduct an internal and external evaluation of the program in fiscal years 2012 and 2013, respectively, contingent on appropriations for the grant program. However, USCIS has not yet set interim milestones for these evaluations. Setting such milestones, contingent on the receipt of funding, could help USCIS strengthen its planning for conducting those evaluations, consistent with program management standards.

No federal agency has been tasked with coordinating immigrant integration efforts, but actions are under way to provide strategic direction and guidance for immigrant integration. Local government and nongovernmental officials told GAO that federal direction was lacking, which created challenges in program coordination. In response to a 2010 OoC report to the Office of Management and Budget, which called for developing a federal strategy on immigrant integration, in June 2010 the White House Domestic Policy Council formed the Interagency Working Group on the Federal Role of Immigrant Integration to assess the roles and equities of the federal government in promoting immigrant integration and to better coordinate integration efforts across agencies. Because the work of this group has not yet been completed, it is too early to know if, and to what extent, it will provide leadership for a national immigrant integration capability.

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Abbreviations

DHS	Department of Homeland Security
OoC	Office of Citizenship
USCIS	U.S. Citizenship and Immigration Services

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United States Government Accountability Office
Washington, DC 20548

December 16, 2011

The Honorable Bennie G. Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

Dear Mr. Thompson:

Immigration is a major force affecting this country's social and economic development, and welcoming lawful immigrants reflects one of the nation's distinctive characteristics. In 2009, it was estimated that about 39 million foreign-born individuals lived in the United States, making up more than 12 percent of the U.S. population—the largest share since 1920.¹ Of these, approximately 17 million were naturalized citizens;² 11 million were temporary or permanent residents with lawful status;³ and 11 million were noncitizens without lawful immigration status. Integrating about 11 million noncitizens with lawful immigration status into American society, with the possibility of integrating potentially millions more if Congress passed comprehensive immigration reform, would be a challenging task and raises questions about how this would be accomplished and by whom. Immigrant integration is generally described as a process that helps immigrants achieve self-sufficiency, political and civic involvement, and social inclusion in American communities. Numerous governmental and

¹ Congressional Budget Office, *A Description of the Immigrant Population: An Update* (Washington, D.C.: June 2011).

² A naturalized citizen is a foreign-born individual who has become a U.S. citizen through the naturalization process, by fulfilling requirements set forth in the Immigration and Nationality Act, including, in most cases, having resided in the United States as a lawful permanent resident for at least 5 years. As part of the naturalization process, applicants must first be eligible for naturalization. They must complete an application for naturalization (N-400), appear for an interview, pass an English and civics test (in most cases), and take an oath of allegiance at a naturalization ceremony.

³ Lawful permanent residents may be eligible to naturalize, while temporary residents are authorized to live and work in the United States for a limited period of time and are not eligible to naturalize. Temporary residents do not include visitors, such as those with valid tourist visas, and they are not included in the total estimate of 39 million foreign-born individuals living in the United States. Noncitizens without lawful immigration status are those individuals who are in the country without legal authorization either because they entered illegally or entered legally with a valid visa but overstayed their authorized time in the country.

nongovernmental organizations provide some form of immigrant integration support. The Department of Homeland Security's (DHS) U.S. Citizenship and Immigration Services (USCIS) has responsibility for a key immigrant integration-related area—the naturalization and citizenship process.⁴ The Office of Citizenship (OoC) within USCIS is responsible for implementing immigrant integration activities that fall within the naturalization and citizenship process. The primary focus of these activities is to prepare lawful permanent residents for citizenship by, among other things, helping them attain the English language skills and civics knowledge required for naturalization.⁵ OoC aims to accomplish this by awarding grants to help immigrant-serving organizations with citizenship preparation programs, conducting outreach and public education activities to promote integration and citizenship, and developing educational materials on the naturalization process. The largest single activity that accounted for nearly half of OoC's budget over the past 3 years was its Citizenship and Integration Grant Program, which provides competitive grants to public and private nonprofit organizations to facilitate their ability to assist lawful permanent residents in becoming naturalized U.S. citizens. In addition to USCIS, other federal agencies provide some assistance for immigrant integration. For example, the Department of Health and Human Services provides economic integration assistance as part of its Refugee Resettlement program and the Department of Education provides funding to states to support linguistic integration in connection with its English language acquisition grants. In addition, various state and local governments and nongovernmental organizations provide an array of services that assist with the integration process.

You asked us to review the extent to which the federal government has programs in place to support and coordinate immigrant integration activities. In response to your request, this report discusses the programs and activities at USCIS. Specifically, it examines (1) what steps USCIS

⁴ The term nongovernmental organization includes, among other things, educational institutions, for-profit firms, and nonprofit firms, such as voluntary organizations.

⁵ As part of the citizenship and naturalization process, with limited exceptions, immigrants must show that they can read, write, and speak English; and have a basic knowledge of U.S. history and government (i.e., civics). A lawful permanent resident is any person who is not a citizen of the United States who has been lawfully accorded the privilege of residing permanently in the United States as an immigrant in accordance with the immigration laws, such status not having changed. See 8 U.S.C. § 1101(a)(20).

has taken to implement immigrant integration programs and the extent to which it has assessed the effectiveness of its grant program, and (2) what federal mechanism exists to coordinate governmental and nongovernmental immigrant integration efforts.

To determine the steps USCIS has taken to implement immigrant integration programs and the extent to which it has assessed its grant program, we reviewed the Homeland Security Act of 2002,⁶ and examined documentation on mission objectives and performance measures identified by DHS and USCIS on immigrant integration. These included DHS's strategic plan for fiscal years 2008 through 2013, 2010 *Quadrennial Homeland Security Review Report*,⁷ Budget in Brief reports for fiscal years 2011 and 2012,⁸ and annual performance reports;⁹ USCIS's strategic plan, strategic goals, and initiatives; and USCIS's Citizenship and Integration Grant Program requirements and guidance.¹⁰ We interviewed senior officials from DHS's Office of Policy Development and USCIS offices, including OoC, the Office of Public Engagement, the Office of Policy and Strategy, and the Field Operations Directorate to discuss their roles and responsibilities related to immigrant integration. Further, we selected a nongeneralizable sample of 10 locations for site visits and telephone interviews. Using estimates from the U.S. Census Bureau's 2010 American Community Survey and data from DHS's Office of Immigration Statistics, we selected these 10 locations based on various factors, including the total number of foreign-born residents, whether the region had a mixture of nationalities, the number with limited English proficiency, the number of lawful permanent residents eligible for naturalization, and recognition accorded to locations' immigrant integration programs. We made site visits to Baltimore, Maryland;

⁶ Pub. L. No. 107-296, 116 Stat. 2135.

⁷ DHS, *Quadrennial Homeland Security Review Report: A Strategic Framework for a Secure Homeland* (Washington, D.C.: February 2010).

⁸ DHS, *DHS Budget in Brief Fiscal Year 2011* (Washington, D.C.: 2010), and *DHS Budget in Brief Fiscal Year 2012* (Washington, D.C.: 2011).

⁹ The Quadrennial Homeland Security Review replaced the DHS strategic plan on February 1, 2010.

¹⁰ DHS, USCIS Office of Citizenship, *Grant Reviewer Manual: A Guide to Reviewing the FY2010 Citizenship and Integration Grant Program Proposals and Objective Review Plan for the Fiscal Year 2010 Citizenship and Integration Grant Programs* (Washington, D.C.: 2010).

Chicago, Illinois; Los Angeles, California; and Washington, D.C., and conducted in-person interviews with USCIS officials from four district and field offices; representatives from 10 nongovernmental organizations, including grantees and subgrantees; and officials in government immigrant integration offices about their efforts to foster immigrant integration. We also conducted semistructured telephone interviews with city government officials in New York, New York; Boston, Massachusetts; Richmond, Virginia; Seattle, Washington; Houston, Texas; and Miami, Florida; and discussed their initiatives and efforts to foster immigrant integration. Our site visit and telephone interview results cannot be generalized to other locations, but they provided us with valuable insights about actions USCIS has taken to support immigrants' integration, how USCIS grant recipients are using award funds to support integration, and actions taken by city governments to address integration needs. We reviewed documentation on USCIS's outreach efforts, educational resources, fiscal year 2009 grant program results, and grantees' fiscal year 2010 quarterly performance reports to USCIS.¹¹ We compared USCIS's mechanisms for assessing the results of its grant program against Standards for Internal Control in the Federal Government, which states, among other things, that managers should assess the quality of performance over time and determine proper actions in response to findings. We also compared them against GAO guidance on performance measurement and evaluation.¹² We reviewed all of OoC's immigrant integration programs and focused on the grant program because it was OoC's single largest budget activity and the program for which it collected some data on outcomes; that is, the extent to which lawful permanent residents who were served by OoC grantees passed the naturalization examination and naturalized.

To determine what federal mechanism exists to coordinate governmental and nongovernmental immigrant integration efforts, we reviewed the 2008 report of the presidentially commissioned Task Force on New Americans, which included recommendations on providing leadership in immigrant integration and the extent to which the recommendations have been implemented. We also reviewed DHS reports, such as OoC's 2010 report,

¹¹ USCIS uses data on performance measures that grantees collect to track their progress in meeting performance goals outlined in their grant proposals.

¹² GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

Improving Federal Coordination on Immigrant Integration, and its 2004 report, *Helping Immigrants Become New Americans: Communities Discuss the Issues*, to identify DHS's findings on the extent to which federal leadership is needed, and in what areas. We reviewed DHS's *Quadrennial Homeland Security Review Report* and the annual reports and strategic plans of DHS, USCIS, and OoC to identify DHS's goals for providing federal leadership. Further, we interviewed key officials from DHS's Office of Policy Development and USCIS offices, including OoC, the Office of Public Engagement, the Office of Policy and Strategy, and the Field Operations Directorate, to identify existing federal leadership and coordination activities for immigrant integration throughout the department. We interviewed officials in the four USCIS field offices mentioned above to identify the federal leadership role played by USCIS field offices on a local level. We met with city officials and community-based organization representatives in each of the cities where the four USCIS field offices are located and conducted semistructured telephone interviews with city government officials in the six additional cities mentioned above to obtain their perspectives on the role of the federal government in supporting immigrant integration. The information from the interviews is not generalizable to all cities or community-based organizations, but provided valuable insights into how such organizations view the federal government's support of immigrant integration.

We conducted this performance audit from September 2010 through November 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Appendix I contains additional details about our scope and methodology.

Background

U.S. Citizenship and Immigration Services' Role in the Civic Integration of Immigrants

Through OoC, USCIS manages the programs and activities within DHS that are most directly associated with the civic integration of immigrants.¹³ Created by the Homeland Security Act of 2002, OoC's mandate is to promote instruction and training on citizenship responsibilities for immigrants interested in becoming naturalized citizens of the United States.¹⁴ To accomplish this, OoC competitively awards grants to help immigrant-serving organizations implement citizenship preparation programs aimed at promoting civic integration through naturalization; conducts outreach and public education activities to promote and raise awareness of citizenship and immigrant integration; and develops educational resources on the naturalization process for lawful permanent residents and organizations that help prepare immigrants for citizenship. Outreach activities may include providing technical assistance to providers of citizenship education services; conducting training workshops for adult educators and volunteers on how to prepare immigrants for citizenship; making presentations to educate and inform immigrants about the process of becoming a U.S. citizen; and attending conferences, organizing special naturalization ceremonies, and participating in public events to help promote an awareness of citizenship and immigrant integration. Table 1 summarizes USCIS's programs and activities that aim to support the citizenship aspect of immigrant integration and the goals for those programs and activities.

¹³ According to USCIS officials, in order to help achieve its overall goal of supporting immigrants' integration and participation in American civic culture, USCIS aims to foster a deeper understanding of United States history and the basic civic values that unite Americans when preparing immigrants to pass the U.S. citizenship test.

¹⁴ Section 451(f) of the Homeland Security Act created the Chief of the Office of Citizenship position within USCIS and made the Chief responsible for promoting instruction and training on citizenship responsibilities for immigrants interested in becoming naturalized citizens of the United States, including the development of educational materials. See Pub. L. No. 107-296, § 451(f), 116 Stat. at 2197 (codified at 6 U.S.C. § 271(f)).

Table 1: USCIS Programs and Activities That Aim to Support Civic Integration of Immigrants

Programs and activities	Immigrant integration goals
<p>Citizenship and Integration Grant Program^a Provide competitive grants to public and private nonprofit organizations to facilitate their ability to assist lawful permanent residents in becoming naturalized U.S. citizens.</p>	<p>To expand the availability of quality citizenship preparation programs that can have an effect on an immigrant's integration experience through (1) civics-focused English as a second language instruction, (2) U.S. history and government (i.e. civics), instruction and (3) naturalization application preparation assistance.</p>
<p>Citizenship Outreach – Participate in national, regional, and local events for immigrants and immigrant-serving organizations to engage stakeholders on citizenship and civic integration issues.</p>	<p>To provide information and support to a broad range of stakeholders on topics such as immigrant integration and its linkage to the citizenship and naturalization process. To serve as an opportunity to disseminate information on naturalization eligibility and on USCIS's citizenship education programs and activities.</p>
<p>Citizenship Public Education and Awareness Initiative – Raise awareness about the rights, responsibilities, and importance of U.S. citizenship and the free educational tools and resources available to help eligible lawful permanent residents prepare for citizenship through outreach, organizational partnerships, and paid media through print, radio, and digital advertisements and a public service announcement video.</p>	<p>To provide information and support to a broad range of stakeholders on topics such as immigrant integration and its linkage to the citizenship and naturalization process. To serve as an opportunity to disseminate information on naturalization eligibility and on USCIS's citizenship education programs and activities.</p>
<p>Teacher training workshops – Provide professional development and educational assistance to adult educators and community and faith-based organizations that teach and prepare immigrants for the naturalization process.</p>	
<p>Naturalization information sessions – Provide free public information sessions, including videos and mock interview demonstrations, to help immigrants learn about naturalization eligibility, testing, and citizenship rights and responsibilities.^b</p>	
<p>Naturalization ceremonies – Celebrate the meaning and value of citizenship to immigrants.^c</p>	
<p>Educational Resources on the Naturalization Process</p>	
<p>The Citizenship Resource Center – Provide information (1) to learners on educational materials available to prepare for the naturalization interview and English and civics portions of the naturalization test, (2) to adult educators and volunteers on basic strategies for teaching citizenship and the free materials for use in the classroom, and (3) on building organizational capacity to provide citizenship preparation services in communities.</p>	<p>To assist lawful permanent residents with acquiring the knowledge and necessary skills to become a U.S. citizen by, among other things, making resources available to immigrants that will provide a deeper understanding of U.S. history and government, the naturalization process, U.S. citizenship benefits, and settlement and participation in the community. To assist adult educators and volunteers to improve their content knowledge on citizenship and teach them strategies for enhancing their citizenship instruction programs.</p>
<p>Pamphlets and printed educational materials – Provide information on the naturalization process and the rights, responsibilities, and benefits of citizenship.</p>	

Sources: GAO analysis of agency documentation and interviews with agency officials.

^aAlthough the Citizenship and Integration Grant Program has no authorizing statute, the grant program was established in fiscal year 2009 pursuant to the Consolidated Security, Disaster Assistance and Continuing Appropriations Act, 2009 (Pub. L. No. 110-329, 122 Stat. 3574), which included \$1.2 million for competitively awarded grants to organizations promoting the rights and responsibilities of citizenship. In fiscal year 2010, USCIS changed the name of its grant program from "Citizenship" to "Citizenship and Integration."

^bNaturalization information sessions are carried out primarily by community relations officers and other field office personnel within district and field offices.

^cUSCIS conducts naturalization ceremonies as part of its efforts to achieve its objective on ensuring that the naturalization process is a meaningful experience.

To implement its immigrant integration programs and activities, OoC uses funds from two sources—funds that are provided through the appropriations process and funds that are allocated from USCIS's Immigration Examinations Fee Account. This account consists of fees that USCIS collects from persons filing for immigration benefits (for example, the fees charged to persons who file for naturalization) and deposits into the fee account. As shown in table 2, OoC uses (1) appropriated funds to support its grant program, including the grant awards, grant program staff salaries and other grant administration expenses, as well as citizenship public education and awareness activities and (2) fee account funds for non-grant program staff salaries and expenses, and activities including citizenship educational materials development and dissemination, teacher training, naturalization test implementation, and other operational expenses. Importantly, nearly half of OoC's budget over the past 3 years—\$19.8 million of \$42.6 million (46 percent)—was allocated to its grant program, which includes the funds awarded and program administration and operational expenses for the grant program.

Table 2: Sources and Uses of OoC Budget Funds for Fiscal Years 2009 through 2011

Dollars in millions

	Fiscal year 2009	Fiscal year 2010	Fiscal year 2011	Three-year total budget
OoC's total budget	\$7.6	\$17.0	\$18.0	\$42.6
Sources and uses of funds				
Appropriated funds	\$1.2	\$11.0	\$11.0	\$23.2
Citizenship and Integration Grant Program funds awarded	\$1.2	\$8.1	\$9.0	\$18.2
Grant program staff salaries-(full-time equivalents (FTE))	\$0 (0 FTE)	\$0.3 (6 FTE)	\$0.7 (6 FTE)	\$1.0
Grant program administration and operational expenses	\$0	\$0.3	\$.3	\$0.6
Citizenship Public Education and Awareness Activities	\$0	\$2.4	\$1.0	\$3.4
USCIS fee account funds	\$6.4	\$6.0	\$7.0	\$19.4
Salaries	\$2.2 (17 FTE)	\$2.2 (16 FTE)	\$2.3 (19 FTE)	\$6.7
Citizenship educational resources (development, design, translation, printing, dissemination)	\$2.8	\$2.9	\$3.8	\$9.5
Teacher training workshops	\$0.1	\$0.1	\$0.1	\$0.3
Other operation expenses (travel, training, supplies, equipment)	\$0.8	\$0.6	\$0.6	\$2.0
Naturalization test implementation	\$0.5	\$0.2	\$0.1	\$0.8

Source: USCIS.

Note: Numbers may not add to totals because of rounding.

In addition to OoC's immigrant integration activities, USCIS's Office of Public Engagement and community relations officers within USCIS's district and field offices devote a portion of their time to conducting citizenship-related outreach activities. Specifically, the Office of Public Engagement assists OoC with carrying out its citizenship outreach initiatives on a national level and, at the local level, USCIS districts are required each quarter to conduct at least one citizenship-related outreach activity in the form of a naturalization information session.

Immigrant Integration Efforts Are Multifaceted and Carried Out by Governmental and Nongovernmental Organizations

Providing immigrant integration support to immigrants is a multifaceted effort that is dispersed across governmental and nongovernmental sectors. At the federal level, a wide array of federal programs provide assistance to immigrants and support various aspects of immigrant integration, but those programs are not specifically categorized as directly supporting integration. Based on data that the Office of Management and Budget collected in September 2010, 13 federal agencies across the federal government reported offering a total of 79 programs that either directly or indirectly supported immigrant integration.¹⁵ These federal agencies self-identified programs they perceived as supporting immigrant integration because, according to OoC, there is no standard programmatic definition for immigrant integration. As part of OoC's review of these data, it placed these 79 programs into four categories it identified as broad areas of immigrant integration, as shown in table 3.

¹⁵ In September 2010, the Office of Management and Budget tasked OoC with analyzing budget and programmatic information that the Office of Management and Budget collected from federal agencies on federal programs that directly and indirectly supported immigrant integration.

Table 3: Federal Programs by Immigrant Integration Area Category

Immigrant integration category	Category definition and general description	Total number of programs
Civic	Occurs when all community members belong, are secure in their rights, can exercise their liberties, and share ownership for the community's future.	12
Economic	Occurs when all workers are prepared to meet the challenges of the 21st century workplace, understand their rights as part of the labor force, are empowered with the tools to excel up career ladders and obtain economic self-sufficiency, and are employed in workplaces that are fair—fostering a level playing field for all workers—and diverse, healthy, and safe environments where every worker's contribution is respected.	25
Linguistic	Occurs when all non-English-proficient individuals have acquired the necessary English language skills and related cultural knowledge in order to meaningfully participate and fully contribute to their community.	8
Health and social services, nutrition, administrative, and legal	Occurs when immigrants' integration is focused on other aspects of integration that are not related to civic, economic, or linguistic integration.	34

Source: GAO analysis of agency documents.

The federal programs reported providing immigrant integration support by, among other things, making grants, establishing partnerships, and providing direct services. Civic integration included OoC's citizenship programs; economic integration included refugee resettlement assistance provided by the Department of Health and Human Services; and linguistic integration included English language acquisition grants provided to states by the Department of Education.¹⁶ The data do not represent all federal programs that support immigrant integration and do not provide a complete estimate of federal funding because a number of programs did not report a funding amount. Additionally, agency officials self-identified the programs they perceived as supporting integration.¹⁷ Further, the information collected by the Office of Management and Budget included some programs that served the general population but included immigrant populations as a subset. For example, the Department of Agriculture's National School Lunch Program offers low-cost or free lunches to children from low-income families, which includes immigrants and nonimmigrants.

¹⁶ These programs represent examples of the 79 federal programs that agencies self-reported as supporting immigrant integration to the Office of Management and Budget.

¹⁷ OoC identified other agencies with programs supporting immigrant integration that did not respond to the data request.

Additional examples of federal, state, and local immigrant integration programs and efforts are described in appendix II.

USCIS Has Developed and Implemented Programs to Support Immigrant Integration but Could Strengthen Assessment of Its Grant Program

USCIS Conducts Outreach and Develops Resources for Citizenship and Naturalization

From 2008 to 2011, OoC reported conducting more than 300 significant outreach events to promote citizenship awareness and civic integration and establish partnerships with governmental and nongovernmental organizations to help encourage immigrants' civic integration. Significant outreach efforts could include conferences, special naturalization ceremonies organized by OoC, meetings and training events, and presentations to encourage immigrants to become more integrated into American civic culture. Based on OoC's fiscal year 2011 quarterly reports, examples of its significant outreach activities included meetings with representatives from the Colorado Immigrant Rights Coalition to discuss state and local immigrant integration initiatives and discussions with the Colorado African Organization on OoC's tools and how they could be used to promote citizenship and immigrant integration. OoC also met with the National League of Cities' to discuss how OoC can provide support in their efforts to promote citizenship and immigrant integration.

OoC reported that since fiscal year 2008, it has held 86 citizenship education training workshops for nearly 6,000 adult educators and volunteers working with immigrants across the country. OoC training workshops are designed to enhance the skills needed to teach U.S. history, civics, and the naturalization process to immigrant students. For the 36 requests for training workshops that OoC reported receiving in

fiscal year 2011, it conducted 32 training workshops across 22 states.¹⁸ In fiscal year 2011, as part of its Citizenship Public Education and Awareness Initiative, OoC launched public service announcements to raise awareness about the rights, responsibilities, and importance of U.S. citizenship and the free educational tools and resources available to help eligible permanent residents prepare for citizenship.

In addition to OoC, the community relations officers in USCIS district and field offices conduct citizenship outreach. USCIS field offices reported that during fiscal year 2011, they held 444 naturalization information sessions for more than 22,600 attendees. All representatives we interviewed from 18 governmental and nongovernmental organizations, including grantees and subgrantees, told us that USCIS's naturalization information sessions have helped reach lawful permanent residents eligible to naturalize and influenced their preparation for and decision to become citizens. USCIS has also sponsored special naturalization ceremonies across the country, and since 2006, it has partnered with the National Park Service to hold ceremonies at 22 national park sites.¹⁹

OoC offers a variety of free publications and web-based resources to educate immigrants on the citizenship and naturalization process; help adult educators and organizations prepare immigrants for acquiring citizenship; and help facilitate a smoother transition for immigrants into their communities. Some examples of the publications and web-based resources offered by OoC and agencies with which OoC has formed partnerships to develop and enhance these resources are provided in table 4.

¹⁸ States where OoC offered training workshops in fiscal year 2011 were Arizona, Arkansas, California, Colorado, Florida, Georgia, Indianapolis, Iowa, Kentucky, Maine, Minnesota, Mississippi, New Hampshire, New Mexico, New York, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, and Washington.

¹⁹ USCIS conducts naturalization ceremonies to help achieve its objective of ensuring that the naturalization process is a meaningful experience and its overall goal of supporting immigrants' integration and participation in American civic culture.

Table 4: Examples of OoC Publications and Web-Based Resources to Help Immigrants Prepare for Citizenship

Resource	Description	Partnering agencies
U.S. Citizenship Welcome Packet	For all new citizens, the welcome packet includes the U.S. passport application from the Department of State and A Voter's Guide to Federal Elections from the U.S. Election Assistance Commission. The packet also includes information on updating Social Security records following naturalization and understanding employment practices.	Department of State, U.S. Election Assistance Commission, Social Security Administration, and Department of Justice
<i>Preparing for the Oath: U.S. History and Civics for Citizenship</i>	This is an interactive web-based learning tool intended to support aspiring citizens' efforts to prepare for the civics portion of the naturalization test. It presents videos and activities that showcase artifacts from the Smithsonian Institution's collections and exhibitions. ^a	Smithsonian Institution's National Museum of American History
U.S.A. Learns - www.USALearns.org	This is an online tool for individuals who want to learn or improve their English skills. It offers practice activities in listening, reading, writing, speaking, and life skills necessary for success at work and in the community.	Department of Education, Office of Vocational and Adult Education
WelcometoUSA.gov, Civics and Citizenship Toolkit	WelcometoUSA.gov is a comprehensive web portal intended to provide new immigrants and immigrant-receiving communities with information on settling in the United States and preparing for citizenship. The Civics and Citizenship Toolkit contains educational materials intended to help immigrants learn about the United States.	Partnerships under the Task Force on New Americans ^b
<i>Welcome to the United States: A Guide for New Immigrants</i>	This is a guide is intended to provide comprehensive information to help lawful permanent residents learn about the U.S. system of government and settle into everyday life in the United States.	Department of Education, Office of Vocational and Adult Education

Sources: GAO review of agency documentation and interviews with agency officials.

^aAccording to USCIS, this effort will be launched in February 2012.

^bUnder the Task Force on New Americans, USCIS partnered with the Departments of Agriculture, Commerce, Defense, Education, Health and Human Services, Housing and Urban Development, the Interior, Justice, Labor, State, and the Treasury.

As of August 2011, OoC reported distributing over 29,000 copies of its Civics and Citizenship Toolkit.²⁰ In March 2010, OoC distributed the Toolkit to all public libraries in the City of Los Angeles to help librarians

²⁰ The Civics and Citizenship Toolkit contains a comprehensive guide on settling in the United States; civics flash cards and a video on U.S. history and government; civics lessons based on questions and answers on the naturalization test; the *Citizen's Almanac*, a booklet on the declaration of Independence and Constitution of the United States; and a start-up guide on ideas for programs and services to help immigrants in their communities adjust to life in the United States and prepare for citizenship.

assist eligible immigrants who are seeking naturalization. This effort was part of the partnership between OoC and the City of Los Angeles to promote citizenship and civic integration.

All representatives we interviewed from 18 governmental and nongovernmental organizations, including grantees and subgrantees serving immigrants, told us that they have used OoC's publications to provide immigrants with information on becoming U.S. citizens and getting settled in the United States. Some also told us that they rely on OoC's educational resources to provide consistent information to immigrants on the naturalization process, and some grant recipients include them in their English and citizenship classes. Some also stated that USCIS's redesign of the naturalization test and OoC's naturalization test study materials have helped immigrants prepare for naturalization and relate to basic concepts about the structure of government and American history. Additionally, several of the local government officials we spoke to indicated that because their offices often serve as clearinghouses for immigrant communities and refer individuals to local services or community-based organizations to assist them with various aspects of immigrant integration, including citizenship, they often access USCIS's Citizenship Resource Center website for information when responding to immigrant requests for assistance on the naturalization process.

USCIS Awards Grants for Citizenship and Naturalization but Could Strengthen Its Planning for Conducting Evaluations of Its Grant Program

USCIS Administers a Grant Program to Support Citizenship Education and Naturalization Preparation

Through OoC's Citizenship and Integration Grant Program, which provides support for citizenship education and naturalization preparation, USCIS aims to help immigrants become civically integrated members of their communities. USCIS officials told us that the agency's role in immigrant integration is limited to involvement in civic integration, with programs and initiatives designed to support immigrants on the path to citizenship, because USCIS has no legislative directive mandating it to support other aspects of integration. Further, OoC officials told us that the agency faces uncertainty from year to year as to whether the program will continue to exist, as the grant program has no authorizing statute and

operates under annual DHS appropriations. With funding in fiscal years 2009 through 2011, OoC provided grants to a myriad of governmental and nongovernmental organizations, including public school systems, community colleges, community and faith-based organizations, adult education organizations, public libraries, and literacy organizations, under the following grant categories:

- Direct Services Grant – Citizenship Instruction Only. This grant provides funding to help grantees prepare lawful permanent residents for the civics and English (reading, writing, and speaking) components of the naturalization test. Grantees are required to provide U.S. history and government instruction and civics-focused English as a second language instruction.
- Direct Services Grant – Citizenship Instruction and Naturalization Application Services. This grant funds activities aimed at providing the citizenship instruction discussed above, as well as assisting lawful permanent residents with completing their naturalization applications and preparing them for the naturalization interview.
- National Capacity Building Grant. This grant is intended to provide federal funding to eligible national, regional, or statewide organizations with multiple sites to build capacity among their local affiliates/members to promote immigrant integration through direct citizenship services to lawful permanent residents. The funds are intended to provide support for organizations' program management, organizational capacity building, and technical assistance, as well as for affiliates/members to develop and implement sustainable local citizenship preparation programs.²¹

During the first year of the grant program in fiscal year 2009, OoC received 293 applications for citizenship grant funds and made competitive 1-year grant awards totaling \$1.2 million to 13 organizations to help them improve and enhance their existing citizenship assistance programs. For this first year of the grant program, OoC reported that

²¹ The national, regional, or statewide organization that submits the application is referred to as the principal applicant. The local affiliates/members included under the national capacity building grant are referred to as subapplicants. For fiscal year 2009, USCIS provided funding for the Direct Services grant. In fiscal year 2010, USCIS provided funding for (1) the Direct Services grant, and those funds could be used for citizenship instruction and naturalization application activities, and (2) the National Capacity Building grant. In fiscal year 2011, USCIS provides funding opportunities in three ways: (1) Direct Services – Citizenship Instruction Only, (2) Direct Services – Citizenship Instruction and Naturalization Application Services, and (3) National Capacity Building.

nearly 55,000 immigrants were provided outreach, received direct citizenship services, or both. Of the approximately 55,000 immigrants who received services from grantees, OoC reported that about 50,000 received information on citizenship preparation and the rights and responsibilities of citizenship provided through outreach activities and it was estimated that at least 5,000 participated in a citizenship education class or received assistance with the naturalization application. Specifically, grantees used funds to provide services to a range of immigrants defined by USCIS as priority immigrant groups,²² including elderly immigrants in retirement communities in San Diego, California; low-income immigrants in New York; and refugees with low literacy levels in St. Louis, Missouri. Grantees also built community partnerships to strategically increase their impact. For example, one grantee in Providence, Rhode Island, used grant funds to strengthen a consortium of five immigrant-serving organizations. This consortium accounted for 28 percent of all fiscal year 2009 naturalizations reported under the grant program.

For fiscal year 2010, the second year of the grant program, OoC received 365 applications and made competitive 1-year grant awards totaling \$8 million to 56 organizations. Of these, 48 grants were awarded to help organizations provide direct services to lawful permanent residents, and 8 grants were awarded to help national immigrant-serving organizations with member/affiliate structures provide technical assistance to increase the long-term capacity of the subapplicants to provide direct services to lawful permanent residents. As of the fourth quarter, which ended on September 30, 2011, these organizations reported that, for fiscal year 2010, more than 21,480 immigrants were provided services and about 12,747 immigrants had enrolled in a citizenship education instruction course. Based on quarterly reports submitted by grantees to OoC, grantees reported providing naturalization application services to about 15,094 program participants of whom about 7,277 submitted an application for naturalization and 3,122 had naturalized. Fiscal year 2010 was the first year that OoC awarded national capacity building grants specifically designed to allow organizations to establish or enhance local

²² Fiscal year 2009 grantees served one or more priority immigrant groups, such as soon to be eligible lawful permanent residents 65 years or older; refugees or those granted asylum; lawful permanent residents under the Violence Against Women Act (VAWA); U or T-Visa, or Special Immigrant Juvenile Visa holders, and other disadvantaged groups as defined in the grant proposal.

citizenship preparation programs through eligible service providers. Examples of local capacity building activities proposed by grantees included addressing the unmet educational needs of low-income adults with limited English proficiency and literacy in Atlanta, Georgia, and Nashville, Tennessee; Vietnamese immigrant communities in Houston, Texas; and refugees and immigrants in Erie, Pennsylvania, and Raleigh, North Carolina, among others.

For fiscal year 2011, the third year of the grant program, OoC received 324 applications and, in September 2011, made competitive 2-year grant awards totaling \$9 million to 42 organizations. Specifically, of the 106 applicants for Citizenship Instruction only grants, USCIS awarded approximately \$1.6 million to 11 organizations. Of the 195 applications for Citizenship Instruction and Naturalization Application services grants, USCIS awarded approximately \$5.6 million to 28 organizations, and of the 23 applicants for the National Capacity Building grant, USCIS awarded approximately \$1.8 million to 3 organizations.

Several of the grantees and subgrantees we spoke with told us that OoC's grant program has helped them to, among other things, address their clients' need to improve their English language skills so they can pass the naturalization test. In Chicago, Illinois, where we met with two organizations that received direct service grants, representatives from one organization told us it was using funds to establish two additional citizenship instruction courses aimed at low- and preliterate Latinos with less than a first grade reading level. They also told us that the curriculum for these courses was developed to achieve a seventh grade reading level, which the organization identified as the level needed to pass the naturalization test. An additional organization had developed and disseminated information specifically for lawful permanent residents who have suffered from domestic violence, persecution, and other abuses, which can interfere with their ability to seek assistance for acquiring citizenship. Another grantee in Los Angeles, California, had directed funds to serve lawful permanent residents who had suffered persecution, working with local faith-based groups to reach out to these individuals. A direct services grantee in Baltimore, Maryland, told us it used funds to sustain its ability to provide tuition-free English language and citizenship instruction because its previous funding sources had been cut. The participants who we spoke with at this site said that their reasons for participating in the program were to learn English so they could communicate better and be self-sufficient and to obtain citizenship so they could gain better employment and higher education opportunities. One participant told us that the free instruction she was receiving helped

OoC Has Measures for
Assessing Its Grant Program
but Could Benefit by
Establishing Milestones for
Planned Evaluations of the
Program

increase her English proficiency and motivated her to seek other opportunities to continue learning. She also indicated that she had submitted an application for naturalization and continues to prepare for the citizenship test as a result of the citizenship instruction that she received.

Of the three organizations we contacted that had received funding under the National Capacity Building grant, representatives from one national capacity building organization told us they are expanding services to Haitians and Cubans in Greensboro, North Carolina. Representatives from a subgrantee told us that the grant has allowed them to access updated and innovative materials, curricula, and teaching methods and helped them to develop the capability for expanding the grantee's program from providing only legal and court services to Iranians, Iraqis, and Armenians to also establishing the ability to provide additional services to clients on the path to citizenship. Representative from another organization told us that they planned to provide services to over 1,700 immigrants through four subgrantees establishing citizenship services under the grant.

Grantees can use their Citizenship and Integration Program grant funds on a variety of activities. For reporting purposes, OoC classifies these eligible activities into (1) citizenship instruction (e.g., instruction in English as a second language and U.S. history and government); (2) outreach and training (e.g., staff and volunteer training); and (3) naturalization application services (e.g., assistance with preparing and completing naturalization applications), as shown in table 5. For each of these categories of activities, OoC has required grantees to collect and report data on program outputs, which measure the quantity of program activities and other deliverables, such as the number of participants enrolled in grantees' citizenship instruction and naturalization preparation programs.²³ In addition to these outputs, OoC has collected some information on outcome measures to demonstrate the extent to which grantees' programs are helping program participants complete the naturalization process, such as collecting data on participants' naturalization examination results and the proportion of participants who

²³ Office of Management and Budget Circular A-11 states that output measures describe the level of activity that will be provided over a period of time, including a description of the characteristics (e.g., timeliness) established as standards for the activity. Outputs refer to the internal activities of a program (i.e., the products and services delivered).

received grantees' services and self-reported that they naturalized during the year of the grant program.²⁴

Table 5: OoC's Reporting Requirements for the Citizenship and Integration Grant Program's Grantee Activities, Fiscal Years 2009 through 2011

Fiscal year	Grantee activities and reporting requirements		
	Citizenship instruction	Outreach and training	Naturalization application services
2009	Activities <ul style="list-style-type: none"> English as a second language English literacy and civics education (EL/Civics), or Citizenship Instruction Reporting requirement <ul style="list-style-type: none"> Number of enrolled citizenship education students 	Activities <ul style="list-style-type: none"> Citizenship-focused outreach Staff and volunteer training Reporting requirement <ul style="list-style-type: none"> None^{a,b} 	Activity <ul style="list-style-type: none"> Assistance with preparing and completing the naturalization process, including case management Reporting requirements <ul style="list-style-type: none"> Number of naturalization applications submitted Number of lawful permanent residents served who passed the naturalization test Number of lawful permanent residents who naturalized

²⁴ According to Office of Management and Circular A-11, outcomes describe the intended result of carrying out a program or activity. They define an event or condition that is external to the program or activity and that is of direct importance to the intended beneficiaries, the public, or both.

Grantee activities and reporting requirements			
Fiscal year	Citizenship instruction	Outreach and training	Naturalization application services
2010	<p>Activities</p> <ul style="list-style-type: none"> • Civics-focused English as a second language instruction • Citizenship instruction (U.S. history and government) to prepare lawful permanent residents for the civics and English reading, writing, and speaking components of the naturalization test <p>Reporting requirements</p> <ul style="list-style-type: none"> • Number of newly enrolled citizenship education students (lawful permanent residents only) • Number of lawful permanent residents served who passed the naturalization test and who failed the test • Countries of origin of the lawful permanent residents served 	<p>Activities</p> <ul style="list-style-type: none"> • Citizenship-focused outreach • Staff and volunteer training <p>Reporting requirements</p> <ul style="list-style-type: none"> • Description of outreach efforts in narrative section of performance report • Number of new volunteers recruited and trained 	<p>Activity</p> <ul style="list-style-type: none"> • Services including legal and case management services to support the naturalization application and interview process <p>Reporting requirements</p> <ul style="list-style-type: none"> • Number of naturalization applications submitted • Number of lawful permanent residents provided with naturalization eligibility screening and legal advice • Number of lawful permanent residents served who passed the naturalization test and who failed the test • Countries of origin of the lawful permanent residents served • Number of lawful permanent residents who became naturalized U.S. citizens who met the following criteria: (1) received naturalization eligibility screening and advice or (2) received assistance preparing the naturalization application

Grantee activities and reporting requirements			
Fiscal year	Citizenship instruction	Outreach and training	Naturalization application services
2011	<p>Activities</p> <ul style="list-style-type: none"> Civics-focused English as a second language instruction Citizenship instruction (U.S. history and government) to prepare lawful permanent residents for the civics and English reading, writing, and speaking components of the naturalization test <p>Reporting requirements</p> <ul style="list-style-type: none"> Number of newly enrolled citizenship students Number of students who completed pre- and post assessment tests Number of assessed students who demonstrated improvement on the post assessment test Countries of origin of the lawful permanent residents served Number of students who submitted a naturalization application with no legal services from the organization Number of lawful permanent residents served who passed the naturalization test and who failed the test Percentage of students demonstrating progress Number of classes offered Number of students who naturalized 	<p>Activities</p> <ul style="list-style-type: none"> Citizenship-focused outreach Staff and volunteer training <p>Reporting requirements</p> <ul style="list-style-type: none"> Description of outreach efforts in narrative section of performance report Number of new volunteers recruited and trained 	<p>Activity</p> <ul style="list-style-type: none"> Services including legal and case management services to support the naturalization application and interview process <p>Reporting requirements</p> <ul style="list-style-type: none"> Number of students for whom the organization prepared and submitted a naturalization application and met the following criteria: (1) currently enrolled or were previously enrolled citizenship students who submitted a naturalization application with the assistance of the organization's legal representative or attorney or (2) those who were not enrolled in one of the organization's citizenship classes and have submitted a naturalization application with the organization's assistance Number of G-28 forms submitted (Notice of Entry of Appearance as Attorney or Accredited Representative) submitted as required when representing immigration matters before DHS, whether in person or through the preparation or filing of an application for naturalization by the organization's legal representative or attorney Number of lawful permanent residents provided with eligibility screening and legal advice Countries of origins of the lawful permanent residents served Number of lawful permanent residents who naturalized who met the following criteria: (1) enrolled in one of the organization's citizenship classes and received naturalization legal services from an accredited representative or attorney prior to naturalizing or (2) received only naturalization application and legal services and naturalized during the grant period

Source: GAO analysis of USCIS information.

^aAccording to OoC, for fiscal year 2009 it did not require grantees to report on outreach and training. However some grantees collected this data and submitted it as part of their performance report to OoC.

^bAccording to OoC, the reporting requirement applied only to those grantees that provided information on outreach and training activities in their grant proposals.

In January 2011, USCIS reported on the results of its measures for the fiscal year 2009 grant program based on data submitted by grantees. However, USCIS identified limitations on the reported results. Specifically, USCIS reported that its data on the number of participants who received naturalization application services and passed the naturalization examination, and who ultimately became naturalized, were incomplete in part because grantees relied on data that were self-reported by program participants, and not all program participants reported to grantees whether they passed the naturalization examination and naturalized. Further, there was a time lag between when program participants received naturalization application services and when they passed their naturalization examinations and became naturalized. For example, USCIS reported that for fiscal year 2009, about 1,804 participants received naturalization application services and submitted a naturalization application during the 1-year grant performance period. Of the 1,804 participants, OoC estimated that about 46 percent submitted the application during the third and fourth quarters of the year. USCIS reported that because its average time for completing the processing of naturalization applications was 4.7 months, it was possible that those program participants who applied for naturalization toward the end of the year naturalized after the grant performance period ended. USCIS did not ask grantees to collect information on naturalization examination results and the number of naturalizations of program participants that occurred after the grant period ended.

To help address this issue, for the fiscal year 2010 and 2011 grant programs, OoC provided additional guidance and technical assistance to grantees on how to collect and report program data. These included holding training sessions on grant program reporting guidelines, the types of reports to use in collecting and reporting data on a quarterly basis, and strategies for compiling data and activities from the grant performance period to prepare and submit final reports to OoC. Additionally, OoC provided grantees with 3 additional months beyond the end of the grant performance period to collect and report information on the number of participants who passed the naturalization examination and naturalized.

However, USCIS continues to face two inherent challenges in collecting complete data on grantees' performance. First, grantees may require program participants to provide them with information on their naturalization examination results and naturalization status. However, according to USCIS, it is not feasible for grantees to obtain data on the naturalization examination results and naturalization status for all participants served through grant-funded programs because, among

other things, participants may choose not to report their results to grantees or may decide not to naturalize. USCIS has instructed grantees to develop a plan for working to obtain self-reported data for all program participants, but it acknowledges that grantees may not be able to obtain complete data from all program participants. Second, while USCIS has extended the time period for grantees to report program data, USCIS may not complete the processing of naturalization applications submitted by program participants near the end of the performance period, given the average reported application processing time of 4.7 months.

To further strengthen its measurement of the performance of its grant programs, USCIS announced its plan to conduct an evaluation of the Citizenship and Integration Grant Program in the fiscal year 2011 grant solicitations. However, USCIS has not yet conducted such an evaluation. In January 2011, USCIS drafted a statement of work for a contractor to refine the strategic plan for the grant program and develop an evaluation plan that would allow USCIS to measure the grant program's performance and long-term impact, and which may provide options to help address these limitations. According to USCIS, it did not complete this statement of work or award a contract for an evaluation plan because, at that time, the agency was uncertain whether it would receive appropriations in fiscal year 2011 to continue the grant program. DHS's fiscal year 2011 appropriations act, enacted in April 2011, allowed the use of appropriated funds for the grant program.²⁵ However, USCIS did not proceed with finalizing its statement of work or contracting for development of an evaluation plan because it was unsure of whether it would receive funding in fiscal year 2012 for the grant program. USCIS requested about \$19.7 million for fiscal year 2012 to fund through appropriations all OoC's programs and activities, including the grant program.

In November 2011, USCIS reported that it plans to conduct an internal evaluation of the grant program in fiscal year 2012 by, among other things, assessing grantee data against stated program goals, program assumptions, inputs, program activities, output targets, and outcomes. According to USCIS, these data will be used to determine how resources,

²⁵ See Department of Defense and Full-Year Continuing Appropriations Act, 2011, Pub. L. No. 112-10, div. B, §§ 1101(a)(3), 1102, 1639, 125 Stat. 38, 102, 103, 145. See also Department of Homeland Security Appropriations Act, 2010, Pub. L. No. 111-83, 123 Stat. 2142, 2164-65 (2009); H.R. Rep. No. 111-298, at 117 (2009) (Conf. Rep.).

activities, and outputs link together to meet short-term performance metrics and longer-term outcomes (program goals) of the grant program. Further, contingent on the availability of funds, USCIS reported that in fiscal year 2013 it plans to contract for an external evaluation of the overall grant program. USCIS intends for the contractor to examine how well the current evaluation methodology measures the program's success in meeting its goals, identify what aspects of the program contributed to those achievements, and discover what barriers exist to the program achieving its ideal results. Additionally, USCIS intends for the contractor to make recommendations for improving evaluation methods for the grant program and the effectiveness of program administration.

Internal and external evaluations, such as those that USCIS has announced its intention to implement, could help the agency reassess the goals, objectives, and measures of its grant program, including helping to address inherent challenges with USCIS's current measures, and better evaluate the extent to which the program is achieving those goals and objectives. Based on its uncertainty about whether the grant program will continue to receive funding, USCIS has not yet established interim milestones for its internal and external evaluations of the grant program, such as milestones for initiating and completing the evaluations. Although USCIS has stated its intention to conduct grant program evaluations in fiscal years 2012 and 2013, USCIS also announced plans for an external evaluation in fiscal year 2011, but as indicated, did not initiate or complete that evaluation. Program management standards state that successful execution of any program includes developing plans that include a timeline for program deliverables.²⁶ Standards for Internal Control in the Federal Government and the Office of Management and Budget also call for agencies to have performance measures and indicators that are linked to mission, goals, and objectives to allow for comparisons to be made among different sets of data so that corrective actions can be taken if necessary.²⁷ Further, according to USCIS, a program-specific evaluation of the grant program is a good way to objectively determine whether the current program framework is achieving stated program goals, whether grantees meet desired performance outcomes, how various program implementation characteristics might correlate to other indicators of program success, and whether the grant program should continue. To the

²⁶ The Project Management Institute, *The Standard for Program Management* (2006).

²⁷ See [GAO/AIMD-00-21.3.1](#).

extent that USCIS receives funding in fiscal years 2012 and 2013 for the grant program, initiating the planned internal and external evaluations could provide USCIS with a mechanism for better evaluating its grant program. By setting interim milestones for these evaluations, USCIS could strengthen its planning efforts to develop and implement the evaluations.

No Single Federal Agency Has Been Tasked with Coordinating Immigrant Integration Efforts, but Actions Are Under Way to Provide a Strategy and Guidelines

To date, no single federal entity has been designated to lead the creation, implementation, and coordination of a national immigrant integration capability. Immigrant integration efforts are dispersed across federal, state, and local governments, as well as nongovernmental organizations. In the absence of federal coordination, officials in city governments and representatives from nongovernmental organizations told us that they faced challenges in carrying out their immigrant integration efforts. For example, one representative of a community-based nongovernmental organization said that immigrant integration efforts vary in different regions in the country, and that it would be helpful if the federal government had better guidelines on what constitutes immigrant integration and what is expected of organizations providing immigrant integration services. Another nongovernmental organization representative noted that a lack of coordination in immigrant integration has resulted in a number of nonprofit organizations competing for funds, such as for language classes serving noncitizens with different levels of English proficiency. Additionally, government officials for three cities noted that in the absence of federal guidance for immigrant integration, state and local governments have been setting immigration policies independently, some of which set a negative tone toward immigrants, making it difficult to successfully integrate immigrants. Officials in one of the three cities added that this may adversely affect the attitudes of immigrant populations toward government, even when the immigrants do not reside in those places.

Our previous work has highlighted the benefits of actions that selected federal agencies have taken to enhance and sustain collaborative efforts, including the ability to leverage resources, improve quality, and expand services.²⁸ All representatives we interviewed from 15 governmental and

²⁸ GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

nongovernmental offices indicated a need for a national immigrant integration strategy, federal coordination for immigrant integration efforts, or both. For example, some representatives said that the federal government could help stakeholders forge nationwide partnerships and learn about best practices, and that a national strategy would help develop a more consistent approach to immigrant integration. Also, organizations such as the Migration Policy Institute, the National League of Cities, and the Massachusetts Immigrant and Refugee Advocacy Coalition have called for a federal immigrant integration strategy.

There has been recognition that improved coordination of immigrant integration efforts would be beneficial, and there have been calls at the federal level to develop a national immigrant integration capability. For example, in 2006, a presidential executive order established a task force, chaired by the Secretary of Homeland Security and comprising representatives from 11 federal departments, including DHS, to provide direction to the federal government and make recommendations to the President on immigrant integration. The task force was also to provide direction to executive departments and agencies on integration, particularly through instruction in English, civics, and history. The task force's 2008 report called for a national integration effort and stated that federal institutionalization of immigrant integration would lend credibility and support to federal, state, and local governments and other sectors of society. DHS officials said that DHS facilitated the task force's activities and led the effort to produce a final report, but no agency was designated as the leader for a national immigrant integration effort. The task force, while still technically active, has not met since the issuance of the report in December 2008, according to DHS officials. Additionally, DHS's 2010 *Quadrennial Homeland Security Review Report* states that one of DHS's goals is to strengthen and effectively administer the immigration system by promoting the integration of lawful immigrants. This is to be carried out by providing leadership, support, and opportunities to immigrants to facilitate their integration into American society. The *Quadrennial Homeland Security Review Report* notes that immigrant integration requires leadership, but it does not delineate a framework for accomplishing this. Instead, the *Quadrennial Homeland Security Review Report* notes that homeland security-related functions are dispersed and decentralized and DHS is just one of several components involved in carrying out the Quadrennial Homeland Security Review's strategic framework. OoC officials told us that coordinating immigrant integration activities nationwide could help immigrants navigate federal programs, contribute to the development of a federal strategy and policy guidance, help set measurable goals for immigrant integration, create opportunities

for the federal government to liaise with state governments and nongovernmental organizations, and facilitate sharing best practices and leveraging public-private partnerships.

We previously reported that achieving meaningful national results in many policy and program areas requires a combination of coordinated efforts among various actors across federal agencies and among state, local, and nongovernmental organizations.²⁹ Such coordination requires leadership commitment, agreed-upon goals and strategies, clearly identified roles and responsibilities, and compatible policies and procedures to be effective. USCIS officials stated that they believe that DHS is uniquely situated to coordinate a multiagency effort given its competencies in areas such as immigration services, immigrant integration resources, enforcement, community security, among other things. For example, according to USCIS officials, the agency has access to all foreign-born individuals going through the U.S. immigration process. USCIS has also established relationships with a number of nongovernmental organizations involved in immigrant integration through OoC's outreach efforts and its grant program. Further, USCIS has engaged in dialogue at the local level and established partnerships at the local level. For example, USCIS and the City of Los Angeles signed a 2010 letter of agreement to promote citizenship awareness, education, and outreach events throughout the city. USCIS officials acknowledged that USCIS's resources and authority for undertaking such an effort are limited. The officials also said that since the release of the presidential task force's 2008 report, DHS's role in immigrant integration has been limited to those aspects of civic integration, such as citizenship and promoting the rights and responsibilities of citizenship, discussed earlier in this report.

As a result of OoC's 2010 report to the Office of Management and Budget, which called for developing a federal strategy on immigrant integration, the White House Domestic Policy Council convened a group to focus on immigrant integration.³⁰ OoC noted that the council formed the Interagency Working Group on the Federal Role of Immigrant Integration

²⁹ GAO, *The Upcoming Transition: GAO's Efforts to Assist the 111th Congress and the Next Administration*, [GAO-08-1174T](#) (Washington, D.C.: Sept. 24, 2008).

³⁰ We were unable to meet with officials from the White House Domestic Policy Council for the purposes of this report.

in June 2010 to assess the roles and activities of the federal government in promoting immigrant integration and to better coordinate integration efforts across agencies. According to DHS officials, USCIS is an active participant but not the lead agency in the council's meetings.³¹ Based on OoC's 2010 report to the Office of Management and Budget, the working group developed recommendations in support of a federal integration strategy and consolidation of informational resources, programs, and research through interagency collaboration. OoC's report to the Office of Management and Budget also stated that in late 2010, the Domestic Policy Council disbanded the working group and convened the New Americans – Citizenship and Integration Initiative consisting of several members of the working group, and led by the Interagency Steering Committee.³² The report also stated that the steering committee later distilled the recommendations into three key immigrant integration policy areas: civic integration (naturalization and civic participation), economic integration (employment and economic advancement opportunities), and linguistic integration (learning English to facilitate daily life and support economic and social advancement). The steering committee also developed a 2011 action plan to guide the development of strategic initiatives in the three areas. However, according to DHS officials, a timeline for implementation of the recommendations has not been finalized, and any associated budget or planning process has not yet started. Because the work of this group has not yet been completed, it is too early to know if, and to what extent, it will provide leadership for a national immigrant integration capability.

Conclusions

Integrating immigrants into American society has economic, social, and security implications. We found numerous examples of how USCIS's integration-related programs are helping immigrant populations. In addition, USCIS has taken action to develop and use mechanisms for

³¹ According to a USCIS immigrant integration strategy memo, USCIS was notified by the council that it was to lead the interagency coordination effort on immigrant integration. However, DHS officials told us that this aspect of the memo is not being implemented as written because USCIS does not have the authority to direct the actions of other federal agencies. Currently, there is no document that clarifies USCIS's coordination leadership role as outlined in the memo.

³² According to OoC's 2011 report to the Office of Management and Budget, the Interagency Steering Committee is composed of representatives from the Departments of Education, Health and Human Services, Homeland Security, Justice, and Labor, as well as several Executive Offices of the President.

collecting information on the outputs and outcomes of its integration-related programs, particularly its Citizenship and Integration Grant Program, which is OoC's largest single budget activity. USCIS has faced inherent limitations in collecting complete data on grantees' performance and has stated its intention to conduct an internal and external evaluation of the grant program, contingent on the program receiving future appropriations. Establishing interim milestones for such evaluations, including milestones for initiating and completing the evaluations, could help USCIS strengthen its planning efforts for the program.

Recommendation for Executive Action

To strengthen USCIS's plans for evaluating the Citizenship and Integration Grant Program, we recommend that to the extent that USCIS receives program funding in fiscal years 2012 and 2013, the Director of USCIS establish interim milestones for conducting the planned internal and external evaluations of the grant program.

Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment on November 23, 2011. On December 9, 2011, DHS provided written comments, which are reprinted in appendix III. In commenting on the draft report, DHS concurred with our recommendation that USCIS establish interim milestones for conducting its planned internal and external evaluations of the grant program, and identified actions planned or under way to implement the recommendation.

DHS stated that to the extent that USCIS receives appropriated program funding and is allowed to use the funding for evaluation purposes, it would establish interim milestones for conducting an internal evaluation of the grant program in fiscal year 2012 and an external evaluation of the grant program in fiscal year 2013. DHS also provided additional information on the steps that USCIS's OoC and Office of Policy and Strategy will take to jointly determine the scope of the evaluations. We believe that DHS's proposed actions are consistent with the intent of the recommendation and should help strengthen USCIS's planning effort for the grant program.

DHS also provided written technical comments, which we considered and incorporated as appropriate.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the

report date. At that time, we will send copies to the Secretary of the Department of Homeland Security, relevant congressional committees, and other interested parties. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions concerning this report, please contact me at (202) 512-8777 or stanar@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix III.

Sincerely yours,

A handwritten signature in black ink that reads "Richard M. Stana". The signature is written in a cursive, flowing style.

Richard M. Stana
Director, Homeland Security and Justice Issues

Appendix I: Objectives, Scope, and Methodology

This report examines (1) the steps the U.S. Citizenship and Immigration Services (USCIS) has taken to implement immigrant integration programs and the extent to which it has assessed the effectiveness of its grant program and (2) the federal mechanism to coordinate governmental and nongovernmental immigrant integration efforts.

To determine the steps USCIS has taken to implement immigrant integration programs and the extent to which it has assessed the results of its grant program, we reviewed program activities in USCIS because the focus on immigrant integration ties into its mission. We reviewed the Homeland Security Act of 2002,¹ which created USCIS's Office of Citizenship (OoC) to promote instruction and training and training on citizenship responsibilities.² We also examined documentation on mission objectives and performance measures identified by the Department of Homeland Security (DHS) and USCIS on immigrant integration, including DHS's strategic plan for fiscal years 2008 through 2013, 2010 *Quadrennial Homeland Security Review Report*,³ fiscal years 2011 and 2012 Budget in Brief reports,⁴ and annual performance report for fiscal years 2010 through 2012;⁵ USCIS's strategic plan for fiscal years 2008 through 2012 and fiscal year 2011 strategic goals and select initiatives; and USCIS's Citizenship and Integration Grant Program requirements and guidance.⁶ We interviewed DHS senior officials from DHS's Office of Policy Development and USCIS offices, including OoC, the Office of

¹ Pub. L. No. 107-296, 116 Stat. 2135.

² Section 451(f) of the Homeland Security Act created the Chief of the Office of Citizenship position within USCIS and made the Chief responsible for promoting instruction and training on citizenship responsibilities for immigrants interested in becoming naturalized citizens of the United States, including the development of educational materials. See Pub. L. No. 107-296, § 451(f), 116 Stat. at 2197 (codified at 6 U.S.C. § 271(f)).

³ DHS, *Quadrennial Homeland Security Review Report: A Strategic Framework for a Secure Homeland* (Washington, D.C.: February 2010).

⁴ DHS, *Budget-in-Brief Fiscal Year 2011* (Washington, D.C.: February 2010), and *Budget-in-Brief Fiscal Year 2012* (Washington, D.C.: February 2011).

⁵ The Quadrennial Homeland Security Review replaced the DHS strategic plan on February 1, 2010.

⁶ DHS, USCIS Office of Citizenship, *Grant Reviewer Manual: A Guide to Reviewing the FY2010 Citizenship and Integration Grant Program Proposals and Objective Review Plan for the Fiscal Year 2010 Citizenship and Integration Grant Programs* (Washington, D.C.: 2010).

Public Engagement, the Office of Policy and Strategy, and the Field Operations Directorate, to discuss their roles and responsibilities in how the department defines and designates immigrant integration activities and how it identifies and addresses immigrant integration needs. We reviewed USCIS documentation and educational materials on the U.S. citizenship and the naturalization process and strategies for outreach activities in support of immigrant integration, including the Civics and Citizenship Toolkit and the WelcometoUSA.gov website.

To identify and observe USCIS's immigrant integration activities and community-level efforts by cities and immigrant-serving organizations, we selected a nonprobability sample of 10 locations for site visits and telephone interviews. We visited Baltimore, Maryland; Chicago, Illinois; Washington, D.C.; and Los Angeles, California. We conducted semistructured telephone interviews with officials in New York, New York; Boston, Massachusetts; Richmond, Virginia; Seattle, Washington; Houston, Texas; and Miami, Florida. Using estimates from the U.S. Census Bureau's 2010 American Community Survey and data from DHS's Office of Immigration Statistics, we selected these 10 locations based on various factors, including the total number of foreign-born residents, whether the region had a mixture of nationalities, the number with limited English proficiency, the number of lawful permanent residents eligible for naturalization, and recognition accorded the locations' immigrant integration programs. Additionally, we took into account the proximity of USCIS offices and nongovernmental immigrant-serving organizations, as well as organizations awarded Citizenship and Integration Program grant funds in fiscal years 2009 or 2010.

During our site visits, we interviewed officials in USCIS's Baltimore, Chicago, Los Angeles, and Washington, D.C., district offices to identify the role played by these offices in implementing USCIS local immigrant integration activities. In these four cities, and via telephone in the other six cities, we interviewed representatives of 10 community-based organizations, including grantees and subgrantees, and officials in government immigrant integration offices about their efforts to foster immigrant integration and how local efforts benefit from federal immigrant integration initiatives. Although our site visit and telephone interview results cannot be generalized to other locations with foreign-born populations, they provided us with valuable insights about actions USCIS has taken to support immigrants' integration, how USCIS grant recipients are using award funds to support integration, and actions taken by city governments to address integration needs.

To identify the steps DHS has taken to assess the results of its immigrant integration efforts, we reviewed DHS documents with stated immigrant integration directives and performance targets, and interviewed officials and staff at the DHS Office of Policy Development and USCIS offices, including OoC, the Office of Public Engagement, the Office of Policy and Strategy, and the Field Operations Directorate, to obtain clarification on DHS's efforts to delegate responsibilities and capture results of intra-agency actions to promote immigrant integration. We reviewed immigrant integration accomplishments detailed and summarized in DHS's Budget in Brief reports for fiscal years 2011, and 2012. We reviewed OoC's tracking information for its citizenship promotion and immigrant integration activities. We interviewed officials in USCIS district offices in the four cities we visited to obtain information about their citizenship promotion and immigrant integration outreach activities and the methods for capturing activity results. To determine how OoC assesses its immigrant integration efforts through its Citizenship and Integration Grant Program, we reviewed grantee performance results during the first funding round in fiscal year 2009, which had a 1-year performance period. We reviewed grantees' reports to OoC on the number of participants registered for direct services citizenship and English instruction courses, naturalization applications filed, and participants naturalized, and we also examined program results reported by grantees and results obtained via OoC staffs' on-site grantee performance monitoring during this performance period. We interviewed OoC staff on their performance monitoring methods and how they supported grantees through guidance and technical assistance. We corroborated this information in our interviews with select grantees in the four selected cities. Additionally, we viewed some of the citizenship instruction programs, obtained grantee performance reports submitted to OoC, and obtained documentation on the results of OoC's on-site grantee monitoring efforts. Lastly, we interviewed some individual program participants to learn about how the program had affected their progress toward the goal of becoming naturalized, their perceptions on citizenship, and their views on integrating into their communities. We compared USCIS's information on the results of its grant program against Standards for Internal Control in the Federal Government, which states, among other things, that managers should assess the quality of performance over time and determine proper actions in response to findings.⁷ We reviewed all of

⁷ GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

OoC's programs and focused on the grant program because it was OoC's single largest budget activity and the program that collected some data on outcomes, that is, the extent to which lawful permanent residents who were served by OoC passed the naturalization examination and naturalized.

To determine what federal mechanism exists to coordinate governmental and nongovernmental immigrant integration efforts, we reviewed the 2008 report from the presidentially commissioned Task Force on New Americans to identify previous recommendations on providing leadership in immigrant integration and the extent to which the recommendations have been implemented. We reviewed DHS reports, such as OoC's 2010 report, *Improving Federal Coordination on Immigrant Integration*, and its 2004 report, *Helping Immigrants Become New Americans: Communities Discuss the Issues*, to identify DHS's findings on the extent to which federal leadership is needed, and in what areas. We reviewed DHS's *Quadrennial Homeland Security Review Report* and the annual reports and strategic plans of DHS, USCIS, and OoC to identify DHS's goals for providing federal leadership. We also interviewed key officials from DHS's Office of Policy Development and USCIS offices, including OoC, the Office of Public Engagement, the Office of Policy and Strategy, and the Field Operations Directorate to identify the existing immigrant integration federal leadership and coordination activities for immigrant integration throughout the department. We interviewed officials in the four USCIS field offices mentioned above to identify the federal leadership role they played by USCIS field offices on a local level. We met with city officials and community-based organization representatives in each of the cities where the four USCIS field offices are located, and conducted semistructured telephone interviews with city government officials in the six additional cities mentioned above, to obtain their perspectives on the role of the federal government in supporting immigrant integration. The information from these interviews is not generalizable to all cities or nongovernmental organizations but provided valuable insights into how such organizations view the federal government's support of immigrant integration. We reviewed laws and proposed legislation to identify existing and proposed policies for federal leadership in immigrant integration. We also consulted with outside researchers and reviewed their reports, including the Migration Policy Institute, the National League of Cities, and the National Conference of State Legislatures, to obtain their perspectives on immigrant integration issues faced by state and local governments and nongovernmental organizations and the extent to which the federal government has provided leadership in this area.

We conducted this performance audit from September 2010 through November 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Examples of Federal, State, and Local Immigrant Integration Efforts

Federal agencies have at times worked together on aspects of immigrant integration, such as civics and English language education for immigrants. For example, in 2011, an amendment to a 2010 memorandum of understanding was established between USCIS and the Smithsonian Institution National Museum of American History to develop a learning tool that supports aspiring citizens' efforts to prepare for the civics portion for the naturalization test. Specifically, the National Museum of American History will provide instructional design and content expertise for the development of lesson plans and multimedia presentations that utilize content from the museum and other Smithsonian collections and will incorporate the civics questions that may be asked during the naturalization test.¹ Separately, in 2010, USCIS provided funding to the National Institute for Literacy, for the expansion of the America's Literacy Directory, a web-based directory about literacy programs, to incorporate citizenship preparation programs and classes.² Also, as of July 2009, USCIS and the Department of Education had in place an interagency agreement to support a web-based tool for lessons in civics-and citizenship-oriented English language learning, according to Homeland Security and Educational Officials.³

State and local governments have also taken action to develop policies and plans to foster immigrant integration. For example, governors in Illinois, Maryland, Massachusetts, New York, and Washington have issued executive orders specifically to address immigrant integration issues.⁴ These executive orders called for establishing an advisory body (e.g., a committee or a council) made up of key stakeholders, such as state and local government officials and representatives of nongovernmental organizations, to make policy recommendations on immigrant integration. The advisory bodies have made recommendations

¹ USCIS will provide funding to support this effort.

² According to USCIS, the National Institute for Literacy no longer exists and all content for this resource was transferred to the U.S. Department of Education.

³ According to Education officials, USCIS also provided some funding to support this effort.

⁴ Some states have taken other actions in support of immigrant integration. For example, Massachusetts, New York, have established offices that aim to administer programs that assist immigrants in achieving immigrant integration, including economic, social, and civic integration. Other states have established programs targeted at immigrant groups within certain state administrative offices, such as human services and labor offices.

to, among other things, incorporate immigrant integration into state education, workforce, and financial service programs; promote English language proficiency and civics education; and centralize information available to immigrants upon their arrival to the community. A common objective of these executive orders was to develop policies and plans or recommendations to provide immigrants with the tools to become self-sufficient and contribute to their communities.

Local governments have also responded to the needs of immigrants in their communities in ways that address immigrant integration issues. In some cases, local officials serve as liaisons between city offices on activities that foster immigrant integration. For example, the liaisons may encourage offices to provide information in multiple languages on workforce training, library services, or other available services or to incorporate activities geared toward immigrants into local social service programs. Other local governments provide information clearinghouses for immigrant communities, referring individuals to local services or community-based organizations that can assist with various aspects of immigrant integration, including English and citizenship classes, legal services, and vocational training.

Across the country, governmental and nongovernmental organizations—including community-based groups, social service organizations, ethnic associations, local public school systems, universities and community colleges, refugee resettlement agencies, health centers and hospitals, religious institutions, unions, and law firms—have joined together to form coalitions to advocate for and serve as resources to immigrants and promote their integration into American society. One example is the Massachusetts Immigrant and Refugee Advocacy Coalition, which seeks to promote the rights and integration of immigrants and refugees through policy analysis and advocacy, institutional organizing, training and leadership development, and strategic communications and consists of more than 130 organizations. In Illinois, more than 120 organizations—including advocacy groups, religious institutions, and neighborhood associations—make up the Illinois Coalition for Immigrant and Refugee Rights, which seeks to promote full and equal participation in the civic, cultural, social, and political areas by immigrants. Both the Massachusetts and the Illinois coalitions are members of the National Partnership for New Americans, a nationwide alliance of 12 immigrant rights coalitions seeking to support citizenship and the integration of immigrants into

American communities through outreach to immigrant groups, assistance with capacity building for small organizations in remote areas, and policy advocacy, among other things.⁵ The National Partnership for New Americans hosts an annual national immigrant integration conference, with past participation from representatives of the White House Domestic Policy Council, USCIS, and other governmental and nongovernmental organizations.⁶

In addition, the National League of Cities' Municipal Action for Immigrant Integration program seeks to promote civic engagement and naturalization in cities and towns across the United States by providing resources and technical assistance and serving as an information clearinghouse for best practices. The Migration Policy Institute's National Center on Immigrant Integration Policy, in partnership with the J.M. Kaplan Fund, is also providing annual monetary awards during a three year period to outstanding immigrant integration initiatives led by nonprofit or community organizations, businesses, public agencies, religious groups, or individuals. In addition to these broader initiatives, individual organizations in communities across the nation are involved in efforts to support immigrant integration, for example, through English language instruction, workforce development, and legal services.

⁵ The National Partnership for New Americans consists of coalitions from California, Colorado, Florida, Illinois, Maryland, Massachusetts, New York, Oregon, Tennessee, Washington, and Wisconsin and the National Korean American Service and Education Consortium.

⁶ GAO attended the 2010 National Immigrant Integration Conference in Boston, Massachusetts.

Appendix III: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

December 9, 2011

Richard M. Stana
Director, Homeland Security and Justice Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Draft Report GAO-12-274, "IMMIGRANT INTEGRATION: U.S. Citizenship and Immigration Services Could Better Assess Its Grant Program"

Dear Mr. Stana:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO's) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's acknowledgement of the actions the U.S. Citizenship and Immigration Services (USCIS) has taken to develop programs to support immigrant civic integration through citizenship education, public education and outreach, and grants for organizations that help prepare legal permanent residents for naturalization. DHS and USCIS remain committed to maintaining our tradition of welcoming immigrants to the United States and helping ensure our newest citizens are prepared to meet their responsibilities and exercise their rights.

The draft report contained one recommendation addressed to DHS with which the Department concurs. Specifically, to strengthen USCIS's plans for evaluating the Citizenship and Integration Grant Program, GAO recommended that the Director of USCIS:

Recommendation: To the extent that USCIS receives program funding in fiscal years 2012 and 2013, establish interim milestones for conducting the planned internal and external evaluations of the grant program.

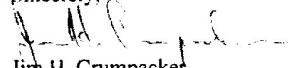
Response: Concur. Given the importance of the grant program in accomplishing our mission to support immigrant civic integration, USCIS will take the following actions in the immediate future to the extent that USCIS receives appropriated program funding in Fiscal Years (FYs) 2012 and 2013 and is permitted to use appropriated funding for the following purposes:

- Establish interim milestones for conducting an internal evaluation of the grant program in FY 2012 and an external evaluation of the grant program in FY 2013.

- The USCIS Office of Citizenship plans to work with the USCIS Office of Policy and Strategy to determine the scope of an internal and external evaluation of the grant program, including the type of evaluation it intends to conduct, the evaluation questions to be answered, and the potential methodological approaches for the internal and external evaluation of the grant program. This work will include identifying methods for assessing grantee data within the context of stated program goals, program assumptions, inputs, program activities, output targets, outcomes, and approaches for obtaining data. The data intended for use in determining how resources, activities, and outputs link together to meet short-term performance metrics and longer-term outcomes (i.e., program goals) of the grant program. The Office of Citizenship will work to identify an expanded set of indicators of successes to be shared publicly as promising practices.

Again, thank you for the opportunity to review and comment on this draft report. General, technical and sensitivity comments were provided under separate cover. We look forward to working with you on future Homeland Security issues.

Sincerely,



Jim H. Crumpacker
Director
Departmental GAO-OIG-Liaison Office

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Evi Rezmovic, Assistant Director; Yvette Gutierrez-Thomas; Danielle Pakdaman; and Mya Dinh made significant contributions to this report. David Alexander assisted with design and methodology. Linda Miller provided assistance in report preparation, and Frances Cook provided legal support.

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