



# Funding Implementation Strategy Accommodating Differences in Service Difficulty in Facilitating Legalization of Immigrants

*By Ed Kissam*

A Preliminary Legalization Service Difficulty Index (L-SDI)  
for Planning Legalization Assistance

Presented to GCIR Meeting, 8 October 2013

## Overview

Not all immigrants will need assistance in applying for legalization and some sub-populations of undocumented immigrants will need more help than others. A key factor in the ultimate success of providing legalization assistance to undocumented immigrants will be deploying resources cost-effectively so all can get the types of services they need.

The accompanying thematic map is our initial, exploratory effort to develop this concept so as to roughly estimate the relative difficulty of providing legalization services in different areas of California (or any area of the country). It shows variations in predicted legalization service difficulty constructed so as to estimate the relative difficulty of implementing legalization support in different areas.

With this endeavor it is now feasible to use any of several analytic approaches developed by immigration researchers (Jeffrey Passel at the Pew Center for Hispanic Research, Enrico Marcelli at San Diego State University, Randy Capps, Migration Policy Institute, and Bob Warren, former Director of the INS Office of Statistics, and their collaborators) to incorporate profile information on the characteristics of the undocumented population in different local areas/regions into CIR-related (and other) service planning.

Recently, CSII used their own version of this approach very elegantly to generate descriptive analyses of the undocumented population in California in their publication “What’s at Stake for California: Undocumented Californians, Immigration Reform, and our Future Together” (Pastor and Marcelli 2013) to develop profiles of the naturalization-eligible, LPR, and undocumented population in different areas of California. The current version of the SDI and thematic mapping is based on their September 26<sup>th</sup> analysis/tabulation provided to GCIR.

There are inevitably general constraints on planners’ ability to systematically project service difficulty and, specifically, on this Version 1.0 of the Service Difficulty Index (SDI). These stem from: a) quality of the underlying American Community Survey Data, b) limitations of the analytic techniques to distinguish undocumented legalization-eligible immigrants from LPR’s and other non-naturalized

foreign-born respondents to the ACS, c) limitations of assumptions regarding predictors of service difficulty, and specifically, the best weighting for each of multiple partially co-variant variables in constructing a composite “service difficulty index” (SDI), d) service delivery difficulties stemming from factors not considered in the current model, e.g. local transportation, diversity of languages spoken, local media market.

Nonetheless, we believe the SDI is, even in this preliminary form, a useful tool. Our hope is that it will be possible to move forward collaboratively to refine it and use it as one of the analytic tools to support sound planning for CIR implementation.

### **Notes on Construction of Version 1.0 of the L-SDI**

To construct this initial edition of the L-SDI, GCIR asked CSII to provide tabulations of four variables, each of which have face validity as a reliable factor in projecting the difficulty of providing legalization services to an undocumented population. Each is then used to score each county’s estimated difficulty. These variables are:

- Educational Attainment (persons Age 25+)
- English Language Ability (persons Age 5+)
- Recency of Migration
- Age at Migration

We asked CSII to prepare tabulations reporting the estimated % of undocumented persons in each county falling into a particular category. We then constructed the L-SDI by generating a sub-score for each county on each of the variables and combining them so as to generate a single composite score of legalization service difficulty: the L-SDI.

Each score component was, then, weighted in order to bring each of the 4 sub-score components into an arithmetically comparable range and to reflect our assessment of the relative importance of each of the 4 sub-scores as predictors of overall legalization service difficulty.

#### ***Educational Attainment sub-score***

Low literacy gives rise to difficulties not only in reading and filling out forms but, more generally, in navigating the complexities of compiling the information needed for an application, and complying with bureaucratic procedures. Based on earlier research on adult literacy nationally and in California (ETS/DOL 1992; ETS 1994 and research on Hispanic census forms response (Kissam, Nakamoto, and Herrera 1995) we computed the educational attainment sub-score for each county based on the ratio between the numbers of undocumented immigrants with <9 years of schooling to the numbers with 12+ years of schooling. We are confident that most of those in the lowest group will have substantial difficulty with USCIS forms and procedures and that most of those in the highest group will have minimal literacy-related difficulties.

We weighted the educational attainment sub-score up to give it the greatest weight of the 4 variables used to generate the composite L-SDI score for each county—with low scores representing relative service ease and high scores representing relative service difficulty.

#### ***English-language ability sub-score***

Legalization applicants who are less English-proficient encounter more difficulties in dealing with USCIS and other bureaucratic processes than those who are English-proficient. The ACS data are somewhat problematic in providing the ideal indicator of an immigrant population's English-language ability because the category "speaks English not well" encompasses too wide a range of abilities. However, we feel confident that the ACS data on respondents who say they speak English "not at all" or "well or very well" is quite reliable. Therefore, as with the educational attainment sub-score, we generate the English-language ability sub-score as the ratio of the numbers of non-English speaking undocumented immigrants to the numbers of those who are English-proficient.

We give the English-language ability sub-score slightly less weight than the educational attainment sub-score in constructing the composite variable because we believe serving limited-English clients requires relatively less special procedures and staffing than adapting to the assistance requirements of serving very low-literate applicants.

### **Recency of Migration sub-score**

Under the provisions of S. 744 even quite recent immigrants will be eligible for legalization. However, because it has taken so long to get to CIR, there are also many undocumented immigrants who have lived in the U.S. for a number of years. Length of time in the U.S. is likely to be a factor in legalization service difficulty because the most recent immigrants are less-well oriented to US life and procedures than long-term settled immigrants and because they are likely to have less stable employment and less well-developed social networks (although this, in fact, depends on an immigrant's specific family/village migration network).

We generate the recency of migration sub-score as the ratio of the percent of immigrants in a county who have lived in the U.S. for 3-10 years to the percent who have lived in the US 11 years or more. We are open to the possibility of modifying the specific cut-points for this analysis if it turns out there is evidence that the process of immigrant adaptation is so non-linear that there is a better-cut point than 10 years residence for computing the ratio.

We weight the recency of migration sub-score down slightly because we believe it is relatively less of a factor than educational attainment and English-language ability in determining legalization service difficulty.

### **Age at Migration**

The age at which an immigrant comes to the U.S. is an important factor in their social integration. In particular, children integrate more rapidly than adults. Thus we have generated the age-at-migration sub-score as the ratio of the numbers of immigrants who came to the U.S. at the age of 15 or less (basically the DACA-eligible, DREAM Act age-eligible population) to the numbers of immigrants who have arrived at age 16 or older.

We weight this sub-score heavily (both to bring the range of these sub-scores nearer to the other three variables and to reflect the sensitivity and relatively narrow range of variance in the <16 population of undocumented immigrants, i.e. 23% to 31%).

## Range of County Composite L-SDI Scores

The L-SDI county scores proposed as an indicator of relative legalization service difficulty for a county range from 4.72 to 8.43. The actual computed value of the L-SDI for a county matters less than the ratio of the L-SDI for any county to that of any other county.

## Range of Relative Service Difficulty Index Scores for Counties

Reviewing these ratios provides an indicator of relative service difficulty (where 1 is the “easiest” county and higher-scored counties are projected to be more difficult to serve) as follows:

Alameda County L-SDI	1.00
Santa Clara County L-SDI	1.00
Orange County L-SDI	1.05
San Bernardino County	1.12
Los Angeles County	1.14
Riverside County	1.16
San Diego County	1.20
Fresno County	1.78

# Undocumented Population by County



Top Ten Counties	Undocumented Residents	Percent of County Total Population
Los Angeles	892,081	9%
Orange	236,569	8%
San Diego	180,194	6%
Riverside	141,576	6%
Santa Clara	125,627	7%
San Bernardino	117,554	6%
Alameda	96,757	6%
Fresno	81,383	9%
Kern	67,654	8%
Sacramento	61,289	4%

Source: Center for the Study of Immigrant Integration (CSII) analysis of data using IPUMS 2009-2011 American Community Survey (ACS) data (Ruggles et al. 2011).  
 Note: Some data could not be identified at the County level due to geographic restrictions using 2009-2011 Integrated Public Use Microdata Series data.

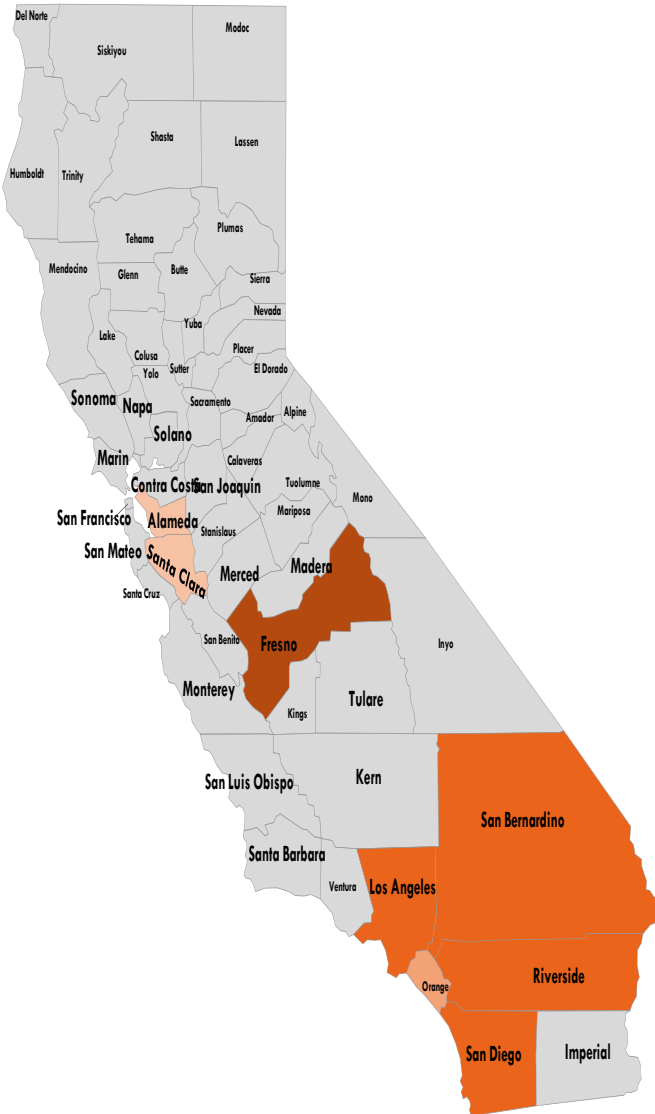
# Legalization Service Difficulty Index (L-SDI) Varies by County

2

County in California	Number of Undocumented	% of Total Undocumented Population in CA	Relative Service Difficulty	Least to Most Difficult
Alameda	96,757	6.37%	1.00	1 <sup>ST</sup>
Santa Clara	125,627	6.96%	1.00	1 <sup>ST</sup>
Orange	236,569	7.75%	1.05	2 <sup>ND</sup>
San Bernardino	117,554	5.73%	1.12	3 <sup>RD</sup>
Los Angeles	892,081	8.98%	1.14	3 <sup>RD</sup>
Riverside	141,576	6.43%	1.16	3 <sup>RD</sup>
San Diego	180,194	5.79%	1.20	3 <sup>RD</sup>
Fresno	81,383	8.68%	1.78	4 <sup>TH</sup>

# Relative Service Difficulty: Selected Counties

3



County in California	L-SDI Score	Least to Most Difficult
Alameda	1.00	1 <sup>ST</sup>
Santa Clara	1.00	1 <sup>ST</sup>
Orange	1.05	2 <sup>ND</sup>
San Bernardino	1.12	3 <sup>RD</sup>
Los Angeles	1.14	3 <sup>RD</sup>
Riverside	1.16	3 <sup>RD</sup>
San Diego	1.20	3 <sup>RD</sup>
Fresno	1.78	4 <sup>TH</sup>