Program Evaluation

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Mayor's Office of Immigrant Affairs & Mayor's Office for Economic Opportunity Response to Evaluation of the NYCitizenship Program

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Increasing immigrant access to citizenship is a powerful tool for fighting poverty, leading to better pay, higher rates of home ownership, political participation, and other benefits. As of December 2019, there are over 620,000 lawful permanent residents in New York City who are eligible to naturalize and have not done so. In 2016, the Mayor's Office of Immigrant Affairs (MOIA) launched NYCitizenship in recognition of the need to assist these individuals in becoming citizens. The program provides free, safe citizenship legal services and financial counseling across the City and is built on innovative partnerships with the City's public libraries and the NYC Human Resources Administration (DSS/HRA). In July 2017, with support from Mayor's Office for Economic Opportunity (NYC Opportunity), NYCitizenship added Community Navigators: highly qualified paralegals with linguistic fluency who are equipped to interface directly with clients, support the completion of naturalization applications, and maintain ongoing oversight of open cases.

This report presents the findings of an implementation evaluation of NYCitizenship by Westat and Metis Associates, which assessed the effectiveness of the program's Community Navigator model and outreach strategies, and identified best practices, lessons learned, and structural barriers that may have led to challenges in the implementation. The evaluation drew upon interviews with NYCitizenship clients, NYLAG legal teams, DSS/HRA staff, library administrators, and MOIA program leads; review of program materials; and analysis of program administrative data for the years 2017-2019.

The evaluation found that NYCitizenship is successful in providing essential services to clients who would not have otherwise been able to complete the naturalization process, and confirms the value of the Community Navigator model in adding necessary capacity to the program. Community Navigators improved program efficiency and provided necessary staff support with linguistic fluency that allowed attorneys to focus on more complex cases that required additional attention. Library partners and DSS/HRA effectively leveraged their roles as "safe spaces" and their existing positive relationships with clients. Direct client outreach was found to be an effective messaging strategy, and providing

legal services on-site at libraries and DSS/HRA was found to enhance trust between legal teams and their clients.

The report also identified areas in need of improvement. Recommendations include: further developing outreach and engagement strategies in languages that match the needs of clients in each location; empowering Community Navigators to work independently of attorneys to serve more people or yield greater efficiencies; and enacting operational enhancements, such as identifying and securing space that is more suitable to legal teams' work, and better mapping responsibilities among partners to avoid confusion for clients.

As other municipalities look to support immigrants who are eligible to naturalize, the NYCitizenship program model presents a viable opportunity to increase access to services that facilitate citizenship. Based on the evaluation findings, the report highlights valuable lessons learned and recommendations for replication, including:

- Strong legal services and administrative/paralegal assistants who are hired from within the communities they serve and who are supported with proper space, technology, and other resources.
- Credible institutions as partners, which should be organizations that have an established and trust-based relationship with local immigrant communities.
- Strong partnerships with close communication, responsibility sharing, and clear lines of demarcation (and complementary skills as well as needs).
- Service targets and metrics calibrated to the complex nature of services provided.

At the time of publication, MOIA is transitioning NYCitizenship to ActionNYC in Libraries, which will continue to screen for and represent individuals in naturalization cases while broadening its capacity to represent individuals pursuing other forms of immigration relief. ActionNYC is a citywide initiative that provides New Yorkers with free comprehensive immigration legal screenings, representation in a variety of case types, [1] and referrals to a broad range of city-funded and community-based services. This transition will further institutionalize immigration legal service offerings at library branches and deepen partnerships between MOIA, the public library systems. Further, DSS/HRA will continue to conduct program activities under the guise of "NYCitizenship at DSS." The findings and recommendations described in this report have informed the strategy, planning, and

[1] Case types include green card renewals, Deferred Action for Childhood Arrivals (DACA) renewals, Temporary Protected Status (TPS) applications, and citizenship applications.

implementation of both ActionNYC in Libraries and the continuation of targeted citizenship outreach to DSS/HRA clients.

At its inception, MOIA and its institutional partners considered the numerous roadblocks on the path to citizenship and sought to implement an effective and multi-pronged program that could meet the challenges. NYCitizenship and its evaluation will be used to inform best practices and methods, and the future of legal services for citizenship.

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Table of Contents

Figures

Executive Summary

As of December 2019, there were over 620,000 lawful permanent residents in New York City who were eligible to naturalize. Almost two thirds of lawful permanent residents are currently in the labor force, but earn significantly less than citizens (born or naturalized) and 27% currently live in poverty (compared to 18% of United States-born citizens). Increasing immigrant access to citizenship is a key strategy for fighting poverty, especially when paired with financial counseling and other supports intended to enhance the economic benefits that accrue from naturalization. However, there are many barriers faced by New York City lawful permanent residents seeking to naturalize. Through the NYCitizenship program, the **Mayor's Office of Immigrant Affairs (MOIA)**, the **Mayor's Office for Economic Opportunity (NYC Opportunity)**, and their institutional partners sought to address these challenges by providing eligible residents with tools needed to achieve naturalization**.** The NYCitizenship program's goal was to:

> ***Provide free legal services, financial counseling, and legal representation for lawful permanent residents in New York City who are eligible to naturalize but have not yet applied for citizenship.***

To achieve this goal, two key challenges were addressed: (1) how to make legal services accessible to immigrant communities that are historically wary of engaging with City programs, and (2) how to provide legal representation in an effective manner. In response to these challenges, MOIA built the program around partnerships with credible institutions (safe, trusted, and with a strong, positive reputation) that would provide better access to immigrant communities. The credible institutions chosen were the City's public libraries[2] and NYC Human Resources Administration (DSS/HRA), the City's social service agency.

Each credible partner was responsible for, and approached, outreach and recruitment differently while leveraging their own organizational assets and community relationships. The three public libraries conducted direct community outreach to the communities served by the branches, while DSS/HRA leveraged its strong relationships with outreach to existing agency clients.

[2] Managed in New York City by three distinct and independent non-profit organizations: the New York Public Library, Queens Public Library, and Brooklyn Public Library.

Participating clients were provided legal representation by NYLAG, the program's selected legal service provider. These services were onsite at the 12 library branches and one DSS/HRA office. Each legal team was led by an attorney, staffed by paralegals, and overseen by one of two supervising attorneys at NYLAG. During the second year of the program, MOIA incorporated an additional design element to the model—Community Navigators—who provided administrative and paralegal support on each team.[3]

In 2019, NYC Opportunity engaged the services of Westat and Metis Associates to evaluate the effectiveness of the Community Navigator model and assess outreach strategies implemented across the program, including differences between outreach strategies undertaken by the library partners and DSS/HRA. The evaluation used a robust mixed-methods approach that included conducting 41 agency administrator and staff interviews, 36 client telephone interviews, and site visits to three representative program locations between August and November 2019. In addition, the team analyzed aggregate administrative data from the library systems, NYLAG, and the DSS/HRA site for the years 2017-2019. This report provides evaluation findings drawn from the interviews, focus groups, and administrative data.

What Worked Well for NYCitizenship?

1) **Partnering with credible institutions for outreach and engagement.** Both the library partners and DSS/HRA built on existing practices to engage NYC residents in the program, leveraging roles as "safe spaces" and positive relationships with clients. Furthermore, the library partners were effective because of their ability to merge outreach for NYCitizenship into their existing and ongoing efforts to engage local communities.
2) **Engaging directly with community members.** Direct engagement was found to be an effective messaging strategy as it allowed outreach staff to interact directly with potential clients. Through the libraries, this included visits to local community groups, face-to-face engagement, and information sessions. Through DSS/HRA, this included letters sent to clients and follow-up phone calls. These efforts provided outreach assistants better

[3] The role of a *Community Navigator* varies within and outside of New York City, with specific responsibilities dependent on the program needs. The intent is to bridge the gap between service providers and community members by hiring individuals who have ties to the communities being served. Prior to introducing Community Navigators to NYCitizenship, MOIA recognized most functions often assigned to Community Navigators were carried out through partnerships with the three library systems. As a result, the Community Navigator model was adapted to fit the specific needs and structure of the NYCitizenship program, with the navigators assigned to support the legal service provider.

opportunities to explain the program and immediately address any fears or misunderstandings.

3) **Utilizing the Community Navigator model.** The Community Navigator model was customized to meet the local context and the needs of the NYCitizenship program. Community Navigators were perceived to increase program efficiency and provided necessary staff support that allowed attorneys to focus on specific cases more selectively (e.g., focusing on more complex cases that required more attention).
4) **Providing on-site legal services.** Providing legal services on-site at the partner organizations (libraries and DSS/HRA offices) was found to be critical to the program's outreach and engagement strategies, enhancing trust built between legal teams and their clients. Clients overwhelmingly reported positive experiences participating in the NYCitizenship program and described staff as kind, professional, responsive, approachable, and helpful. The program proved to be an essential service for clients who reportedly would not have been able to naturalize otherwise.
5) **Effective coordination of primary program partners.** The NYCitizenship model was anchored by the institutional program management support provided by MOIA and the partnership between the legal service provider, NYLAG, and the credible institutions through which clients were reached. Four effective practices for cultivating strong partnerships emerged through the evaluation:
    a. Ensure that the program adds value for each partner
    b. Value and leverage each partner's strengths
    c. Maintain clear boundaries of responsibility between each partner
    d. Maintain strong and open lines of communication at multiple levels

How Could NYCitizenship be Improved?

While the NYCitizenship Program has been successful and positively viewed by clients, there have also been challenges. Discussions with clients and staff yielded several suggested areas for improvement.

1) **Further develop outreach and engagement strategies in languages that match the needs of clients in each location.** For example, there were indications that East Asian immigrant communities may not be reached as effectively through the library partnership. Possible solutions include additional materials tailored to specific languages as well as efforts

to increase partnerships with civic and community groups already embedded within target communities.

2) **Further empower Community Navigators to work independently of attorneys**. Due to their training and position as paralegals, Community Navigators provide a valuable service, yet work under the direct supervision of attorneys. Community Navigators are essential for supporting administrative work. However, they are restricted in client intake and developing naturalization applications because attorneys have greater training and, in the end, are the legal representatives of the clients. The addition of a Department of Justice (DOJ) Accreditation[4] pathway for navigators may help to serve more people or yield greater efficiencies.
3) **Consider full complexity of clients' legal needs.** The legal needs of clients were found to be more complex than expected for a variety of reasons: prerequisite renewal of client I-90/green cards, Freedom of Information Act (FOIA) requests, medical certification for disability exceptions. These cases required significantly more legal-service and administrative time to address. Evaluation findings indicate that the program model did not account for this level of complexity with respect to thresholds and types of deliverables measured, which had a limiting effect on program capacity.
4) **Identify and secure space suitable to legal teams' work.** Legal teams faced challenges that included difficulty obtaining the necessary privacy to effectively meet with multiple clients at once and inconsistent access to physical and technological resources (e.g., private storage areas, staff bathrooms, internet).
5) **Identify and map responsibilities among both primary and additional secondary partners.** For example, when NYCitizenship shifted to using 311[5] and other hotline services to facilitate scheduling of appointments, clients were more likely to be "lost" in the scheduling process and were less likely to attend their legal appointments prepared (according to the perceptions of staff during interviews for the current evaluation). In this

[4] Federal regulations allow non-attorney "Accredited Representatives" to represent individuals before the Department of Homeland Security (DHS) and the Executive Office for Immigration Review (EOIR), which includes the immigration courts and the Board of Immigration Appeals (BIA). These representatives are accredited through the Recognition and Accreditation (R&A) Program. Accredited Representatives may only provide immigration legal services through Recognized Organizations (non-profit, federally tax-exempt entities). For more information about the Recognition & Accreditation Program, visit: https://www.justice.gov/eoir/recognition-and-accreditation-program.

[5] 311 provides the public with quick, easy access to all New York City government services and information through eight platforms: Call Center, Social Media, Mobile App, Text, Video Relay Service and TTY/text telephone.

instance, stakeholders described uncertain divisions of responsibility, ambiguous messaging between partners, and a sense that a core competency of the libraries was no longer being leveraged.

Potential for Replication of Similar Programs in Other Communities

There is a strong potential for replication as many of the partners and resources noted here may also be available to varying degrees in other communities. Municipalities considering replication should focus on the core components of:

- Strong legal services and administrative/paralegal assistants (referred to as Community Navigators in the current implementation) who are hired from within the communities they serve (along with the requisite cultural context and linguistic proficiency) and who are well supported with proper space, technology, and other resources.
- Credible institutions as partners, which should be organizations that have an established and trust-based relationship with local immigrant communities.
- Strong partnerships with close communication, responsibility sharing, and clear lines of demarcation (and complementary skills as well as needs).
- Service targets and metrics calibrated to the complex nature of services provided.

Introduction and Background

There are many barriers faced by New York City lawful permanent residents seeking to naturalize. These challenges include language barriers; the filing fee; navigating the naturalization process; and accessing competent, culturally responsive, and affordable legal assistance. Through the NYCitizenship program, the **Mayor's Office of Immigrant Affairs (MOIA)**, the **Mayor's Office for Economic Opportunity (NYC Opportunity)**, and their institutional partners[6] sought to address these challenges by providing eligible New York City residents with the tools needed to achieve naturalization (e.g., financial counseling, free immigration legal support, and referrals). NYCitizenship has two key components: (1) services that take place at public libraries around the city, and (2) services that are connected to clients served by the **NYC Human Resources Administration (DSS/HRA)**, the City's social service agency. Both components require distinct outreach and communication activities due to the different demographic characteristics of the communities in which the program takes place. In addition, a core part of the program is the "Community Navigators" model (described in greater detail below), where one attorney and two Community Navigators conduct immigration legal screenings and assist individuals in submitting their naturalization application.

In 2019, NYC Opportunity engaged the services of Westat and Metis Associates to evaluate this program. The primary goals of the evaluation were to assess the effectiveness of:

- the Community Navigator model that was launched in July 2017; and
- outreach strategies that were being implemented across the program, including differences between outreach strategies undertaken by the library partners and DSS/HRA.

This evaluation used a robust mixed-methods approach to take advantage of data sources while providing a descriptive report, including administrative data, client interviews, and stakeholder and staff interviews (see Appendix B for additional information). The Westat-Metis team conducted interviews with 41 stakeholders from the libraries, DSS/HRA, MOIA, and the New York Legal

[6] NYCitizenship was made possible through the funding and partnership of Citi Community Development (FY17-20), Robin Hood Foundation (FY17-20), Carnegie Corporation of New York (FY17-19), Revson Foundation (FY18-19), and NYC Mayor's Office of Economic Opportunity (FY18-20).

Assistance Group (NYLAG) between August 2019 and November 2019. Interviewees included members of the NYLAG legal teams and supervising attorneys, outreach staff from both DSS/HRA and each library partner, library branch managers, and program leadership from each partner agency and organization. The Westat-Metis team also conducted three site visits at representative NYCitizenship locations in Manhattan, the Bronx, and Queens. Furthermore, the Westat-Metis team conducted phone interviews with 36 program clients. In addition, the team obtained administrative data from the library systems, NYLAG, and the DSS/HRA site in aggregate form for the years 2017-2019 using an Excel template with variables under the broad categories of service, legal team aggregate data, client background, scheduling, and outreach and engagement. See Table B-1 for a detailed breakdown of data sources by objectives and research questions.

To address the research objectives described previously and central themes of the evaluation, the report is organized into the five sections:

- Outreach and Engagement;
- Community Navigator Model;
- Program Capacity;
- Provision of Legal Services; and
- Elements of the Partnership Between Agencies and Providers.

The report closes with key recommendations for improvement as well as considerations for the replication of the NYCitizenship program by municipalities outside of New York City.

About the NYCitizenship Program

As of December 2019, there were over 620,000 lawful permanent residents in New York City who were eligible to naturalize. In fact, this constituency comprises approximately 7% of New York City's total population. More than half of the lawful permanent residents living in New York City have resided in the United States for more than 10 years, with 27% residing in the United States for more than 20 years. In addition, the median age for lawful permanent residents in New York City is 42 and 30% are over the age of 55 (with 14% over the age of 65). Almost two thirds of lawful permanent residents are currently in the labor force, but earn significantly less ($28,617 median earnings) than naturalized citizens ($40,448) and United States-born citizens ($48,942). As such, 27%

of lawful permanent residents currently live in poverty compared to 18% of United States-born citizens.

There is a clear urgency for programs that assist lawful permanent residents in their naturalization efforts. Citizenship – beyond being a right that should be afforded to all New York City residents – confers a myriad of economic, political, and legal benefits. These benefits include, higher wages, ease of global travel (the ability to leave and re-enter the United States), the ability to petition for family members to immigrate to the United States without fear of removal or separation, voting privileges, greater access to local, state, and federal benefits, and protection against deportation. Increasing immigrant access to citizenship is also a key strategy for fighting poverty, especially when paired with financial counseling and other supports intended to enhance the economic benefits that accrue from naturalization.

Within this context, MOIA and its institutional partners[7] launched NYCitizenship in 2016 in recognition of the need to assist these individuals in becoming citizens. While individuals are able to apply for citizenship on their own, with the assistance of family and friends, or by obtaining legal assistance elsewhere, there was and is a clear need for a program such as NYCitizenship that provides competent, free, legal representation. Currently, despite the advantages of citizenship there are clear roadblocks preventing lawful permanent residents from pursuing this option. This includes lack of free legal counsel, fear of the application process, high costs of private legal services, language barriers, and the risk of having one's current status revoked due to mistakes made during the application process. NYCitizenship was designed to offer an alternative service that avoids these challenges and eases the path forward.

The NYCitizenship program was launched as a program of MOIA, a City of New York Mayoral office with the mandate to "facilitate the full inclusion of immigrant New Yorkers in the city's civic, economic, and cultural life, support access to justice for immigrant New Yorkers, and advocate for immigration reform at all levels of government." The goal of NYCitizenship was to:

> ***Provide free legal services, financial counseling, and legal representation for lawful permanent residents in New York City who are eligible to naturalize but have not yet applied for citizenship.***

[7] NYCitizenship was made possible through the funding and partnership of Citi Community Development (FY17-20), Robin Hood Foundation (FY17-20), Carnegie Corporation of New York (FY17-19), Revson Foundation (FY18-19), and NYC Mayor's Office of Economic Opportunity (FY18-20).

To achieve this goal, MOIA had to address, through the intentional design of the NYCitizenship program model, two key challenges: (1) how to make legal services accessible to immigrant communities that are historically wary of engaging with City programs, and (2) how to provide legal representation in an effective and efficient manner. In response to these challenges, MOIA built the program around partnerships with credible institutions (those with a strong, positive reputation in the immigrant community and who are considered safe and trusted) that would provide better access to and reception within immigrant communities. This design would enhance recruitment and outreach for NYCitizenship, as well as facilitate the provision of services that can positively impact the New York City immigrant community that is eligible to naturalize and seeking to do so. The credible institutions chosen were the City's public libraries[8] and DSS/HRA. Please see below for details about each partner's structure and services. Each partner organization was chosen for their preexisting community or client relationships and the alignment between their own organization's goals and those of NYCitizenship.

By providing DSS/HRA's naturalization-eligible clients (referred to simply as "clients" throughout this evaluation) an opportunity to gain citizenship, which can bring access to additional government resources, the agency is able to help them move closer to financial stability. As part of DSS/HRA's anti-poverty mission, which is carried out through the agency's administration of twelve benefits programs reaching over 3 million residents annually, DSS/HRA is able to reach clients poised to expand benefits through naturalization, focusing on clients whose lack of citizenship is preventing them from accessing federal Supplemental Security Income (SSI) benefits and thus achieving greater financial stability. In turn, the library branches of each library system—which in total provides library and community services to the entirety of NYC—serve as community hubs and each system sees helping lawful permanent residents pursue citizenship as a community service. In different ways, each partner also provides access to program-eligible individuals. DSS/HRA, for example, was able to leverage its pre-existing client list while each of the three library systems had strong credibility within immigrant communities as well as established methods of community engagement and recruitment. With the partners in place, MOIA issued a competitive solicitation for a legal services provider and chose NYLAG, a NYC-based legal assistance provider with strong ties to the

[8] Managed in New York City by three distinct and independent non-profit organizations: the New York Public Library, Queens Public Library, and Brooklyn Public Library.

NYC non-profit and immigrant communities. See Appendix A for more details on the program partners.

Together with these partners, MOIA developed an integrated program model that provided legal services at community partner sites and used MOIA's and DSS/HRA's credibility, resources, and the partners' established relationships for outreach and recruitment. In addition, MOIA and DSS/HRA concluded that in order to leverage the strengths of each partner, the outreach and engagement efforts would operate differently at the libraries and at DSS/HRA, as described below:

- **Library-Based Model.**

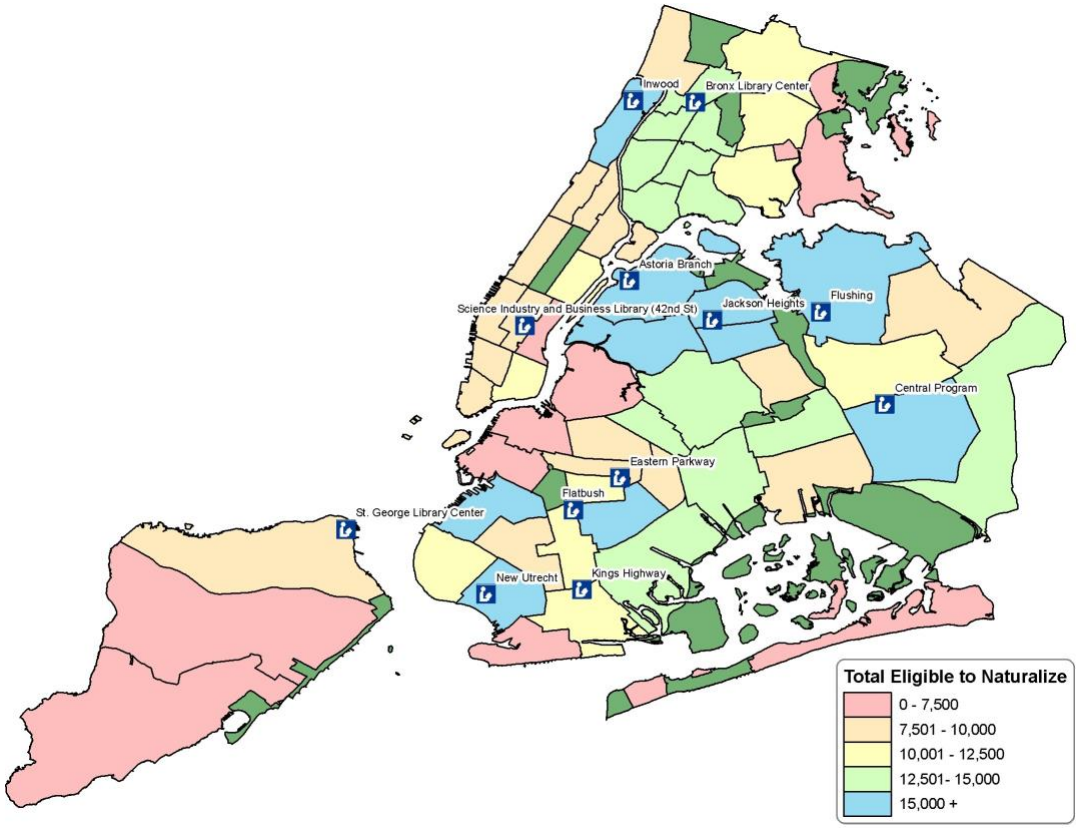
  Background: The program's three library partners – New York Public Library, Brooklyn Public Library, and Queens Public Library – together manage over 200 public libraries across New York City's five boroughs.[9] As such, NYC is unique in the scale of its library coverage as well as the fact that the City's libraries are split into three different organizations. Each system is an independent organization with a central staff and system-wide programs and services. In addition, each one is comprised of neighborhood branches that offer local programs as well as those programs set and managed by the central staff. Each branch is led by a branch manager, who supervises the day-to-day operations. Of the 200 branches, 12 branches were selected to take part in the NYCitizenship program.[10] Branch locations are presented in Figure 1 and mapped against the percentage of residents eligible for naturalization as of 2013, which shows the proximity of libraries and members of the community who are potentially served by these services.[11]

[9] The three library systems are public organizations with municipal and philanthropic funding. The New York Public Library has sites in Manhattan, the Bronx, and Staten Island while the Brooklyn Public Library and the Queens Public Library have sites in their respective boroughs.

[10] At the time of the evaluation, only 11 branches were still participating in the NYCitizenship program, all of which were included in evaluation activities.

[11] Source: The New York City Citizenship Fund: Expanding Access to Citizenship in the Five Boroughs (May 2017), Office of the New York City Comptroller.

Figure 1. Participating Library Branch Locations



Partner Responsibilities: MOIA partnered with all three of the City's library systems to implement the NYCitizenship program. At each system, clients were supported by central staff, called Outreach Assistants, who either worked out of a central library/headquarters or floated between branches and headquarters. Outreach assistant responsibilities included direct face-to-face outreach to community members as well as supporting coordination of outreach via local media, hosting community events, using existing immigrant programs and hotlines, and posting signage within and broadcasting across library branches. To the extent possible, outreach assistants at each library system integrated NYCitizenship into existing engagement efforts. At one library, for example, this meant incorporating recruitment for NYCitizenship into an existing immigrant services hotline. Outreach assistants at the three library systems were also supported by MOIA, which provided program materials (e.g., signage and other collateral, organized media-buys, and other coordinated cross-borough efforts).

In addition, MOIA worked with the leadership of each library system to identify four branches (12 total, across the three partners) that could host the NYCitizenship legal teams. Each of the 12 branches were responsible for providing a permanent space once a week, working with the legal teams on ensuring access to the space and staff facilities, and incorporating outreach and recruitment materials (created and distributed by each

system's central staff) at their locations. Branches were selected based on the availability and appropriateness of their space (meeting criteria for privacy and accessibility), their location in relationship to target communities, and other branch assets such as co-located programs.

Legal Service Delivery: In 2019, NYLAG provided legal services once a week at each of the 12 branches through three legal teams (each assigned to a particular library system).

- **DSS/HRA-Based Model.**

  Background: New York City's Human Resources Administration, a unit of the City's Department of Social Services, is the City's public social services agency and "assists over 3 million low-income and vulnerable New Yorkers annually through the effective and efficient administration of more than 12 major public benefits programs."

  Partner Responsibilities: MOIA partnered with DSS/HRA to leverage the agency's unique relationship with its clients and to reach lawful permanent residents who fall within three sub-populations, for whom federal SSI benefits (which become available with citizenship) represent their best path to increased economic stability. The three populations are homebound individuals, seniors, and clients who have medical or psychological barriers to self-sufficiency, all of which are currently receiving one or more HRA benefits. Each group is income-eligible for federal SSI benefits and qualifies (or likely qualifies) based on age or disability; the third subpopulation (those with medical or psychological barriers) consists specifically of individuals who were identified by DSS/HRA as eligible for SSI based on disability only to have their applications denied for lack of citizenship status.

  DSS/HRA provided space at a DSS/HRA office in Manhattan for the provision of legal services and provided outreach and recruitment to DSS/HRA clients through a team of AmeriCorps Fellows overseen by a program manager.

  The outreach assistants carried out outreach and engagement responsibilities for DSS/HRA, e.g., sending letters, following up by phone, scheduling and maintaining the calendar of appointments along with the DSS/HRA legal teams, and answering questions from clients during the period leading up to clients' intake appointment with the legal services provider.

  Legal Service Delivery: In 2019, NYLAG provided legal services through one team of multiple attorneys three times a week at the DSS/HRA site. In addition, and distinct to the legal team assigned to DSS/HRA, one of the NYLAG legal team's attorneys also made home visits as appropriate and also accompanied clients to United States Citizenship and Immigration Services (USCIS) interviews when necessary depending on the individual's case factors.

Program clients' eligibility to receive legal representation was determined during an initial intake interview with one of the four legal teams, each dedicated to a different community partner (one for each of the three library systems and one for DSS/HRA). The group from the legal team stationed

at each location was led by an attorney, staffed by paralegals (Community Navigators starting the second year of the NYCitizenship program—see below for history) and overseen by one of two supervising attorneys at NYLAG. Services were provided through a consistent and regimented protocol, which began with an intake appointment and an in-depth comprehensive interview to obtain information necessary to complete the citizenship application on the client's behalf. Depending on the outcome of this initial meeting, the legal team either completed and submitted a citizenship application within two weeks or carried out one of several prerequisite steps. For DSS/HRA clients, in particular, it was common for a NYLAG attorney to pursue medical and other types of waivers as described below, given that the DSS/HRA component specifically targeted individuals who were likely eligible for federal SSI benefits due to age or disability. These follow-up steps included, but were not limited to:

- Asking clients for additional background information;
- Obtaining and preparing documents in support of fee waivers;
- Pursuing a Disability Exception on behalf of a client (for clients unable to study for and complete the citizenship exam for medical and health reasons);
- Considering whether a client was eligible for an English-language exemption;[12]
- Submitting a Freedom of Information Act (FOIA) request for more information from a city, state, or federal agency (when clients were unclear on the disposition of prior legal cases or had other questions);
- Referring clients to necessary pre-requisite services such as financial counseling to resolve prohibitive tax situations and prepare clients to effectively approach expected changes to their employment, government benefits, and finances as a result of citizenship; or
- Assisting clients with their I-90/green card renewals as a pre-requisite to citizenship.

Once an application was submitted by a client's legal team, NYLAG monitored correspondence between the USCIS and, at the necessary junctures, advised on issues related to steps of the application process, such as the biometric appointment and citizenship interview, or other government requests. From the perspective of the client, the majority of face-to-face interaction

[12] USCIS allows individuals to take the Civic portion of the naturalization interview in their native language if they are 50 years old with 20 years of lawful permanent resident status, 55 years old with 15 years of lawful permanent resident status or 65 years old with 20 years of lawful permanent resident status. In the case of the latter, the questions are selected from a shorter list.

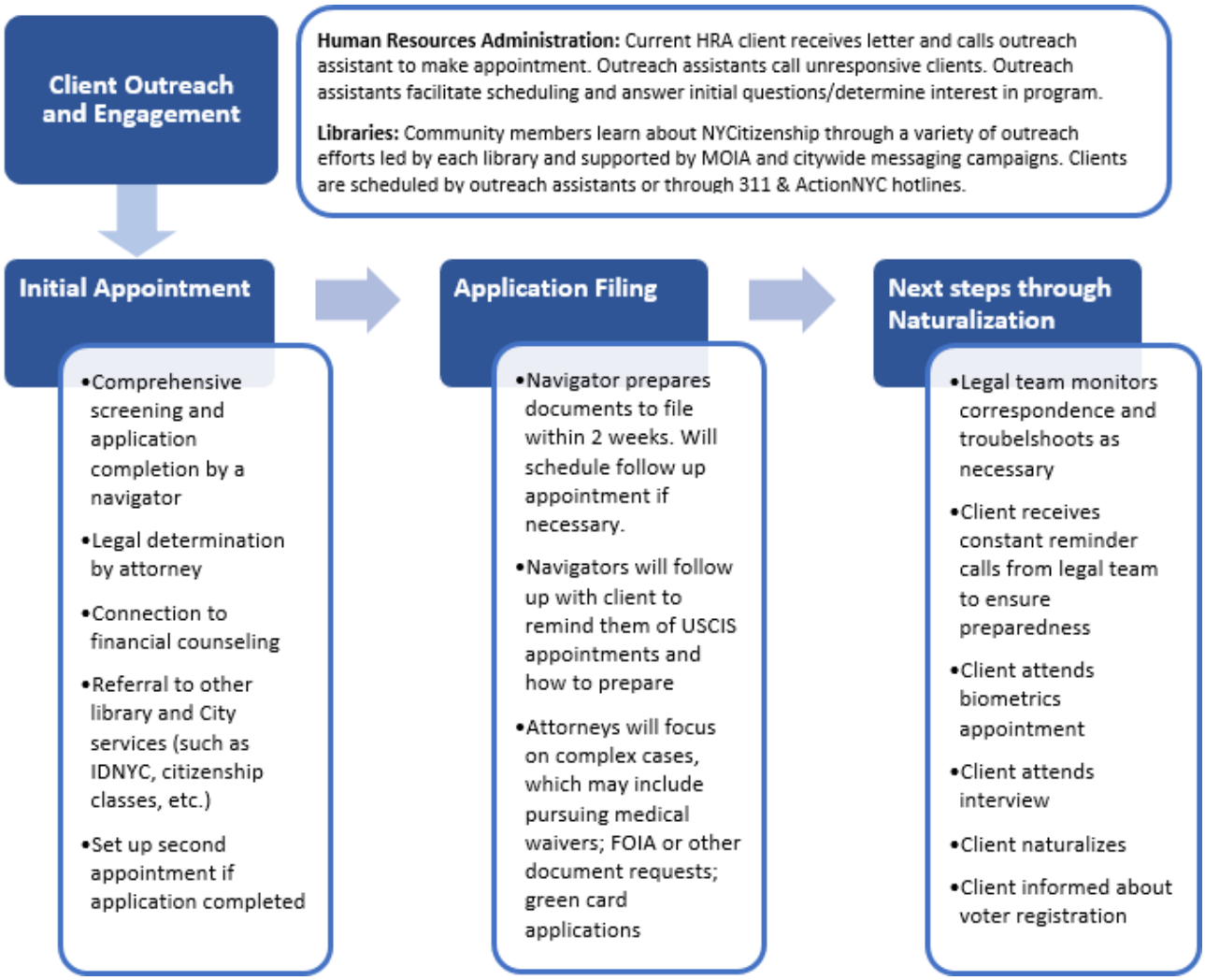
with the legal team occurred at the start of the relationship, with the remaining activities conducted "behind-the-scenes" by NYLAG staff. For each individual taken on as a client, a lead attorney completed a G-28 form, which registers the attorney as the legal representative of the client. This step differentiates the NYCitizenship program from many other naturalization programs that provide pro se assistance (a Latin term meaning "in one's own behalf" and used to indicate self-representation or representation without an attorney in legal proceedings) and not full legal representation. Not only does this step afford the clients better protection and service, it also increases the accountability and responsibility for attorneys and members of the NYLAG legal team.

During the second year of the program, MOIA incorporated an additional design element to the model—**Community Navigators**.[13] With an infusion of funding from NYC Opportunity, NYCitizenship was able to fund the hiring of 12 Community Navigators with linguistic fluency by NYLAG to support the work of the four legal teams and each team's lead attorney. Initially, MOIA envisioned that Community Navigators would be hired from within the communities being served and embedded within each legal team. Due to their unique position, they were expected to facilitate client engagement when legal services were provided and lend cultural and linguistic fluency to each legal team. Because NYLAG is not a community-based organization, legal teams rotated across numerous library branches serving a variety of immigrant communities. The Community Navigators were not necessarily of the communities served, nor did they possess all of the cultural and linguistic competencies relevant to those communities. Consequently and as implemented, each Community Navigator was a highly qualified paralegal (but not necessarily a member of the communities served) who was also equipped to interface directly with clients, support the completion of naturalization applications, and maintain ongoing oversight of open cases. Their relationships with Outreach staff are discussed later. As described later, Community Navigators were essential for alleviating the administrative burden and were critical to NYLAG's ability to maintain the program's high caseloads (because cases often remained open for multiple years due to the nature of this work).

The client pathway of the program as implemented in 2019 is presented in Figure 2.

[13] The role of a *Community Navigator* varies within and outside of New York City, with specific responsibilities dependent on the needs of each program. Most often, the intent of community navigation is to bridge the gap between service providers (who are often municipal agencies) and community members by hiring individuals with authentic ties to the communities being served. Prior to introducing Community Navigators to NYCitizenship, MOIA recognized that the bulk of functions assigned to Community Navigators were being carried out through the program's partnerships with New York City's three library systems. As a result, the Community Navigator model was adapted to fit the specific needs and structural context of NYCitizenship and the navigators were assigned to support the legal service provider.

Figure 2. 2019 Client Pathway

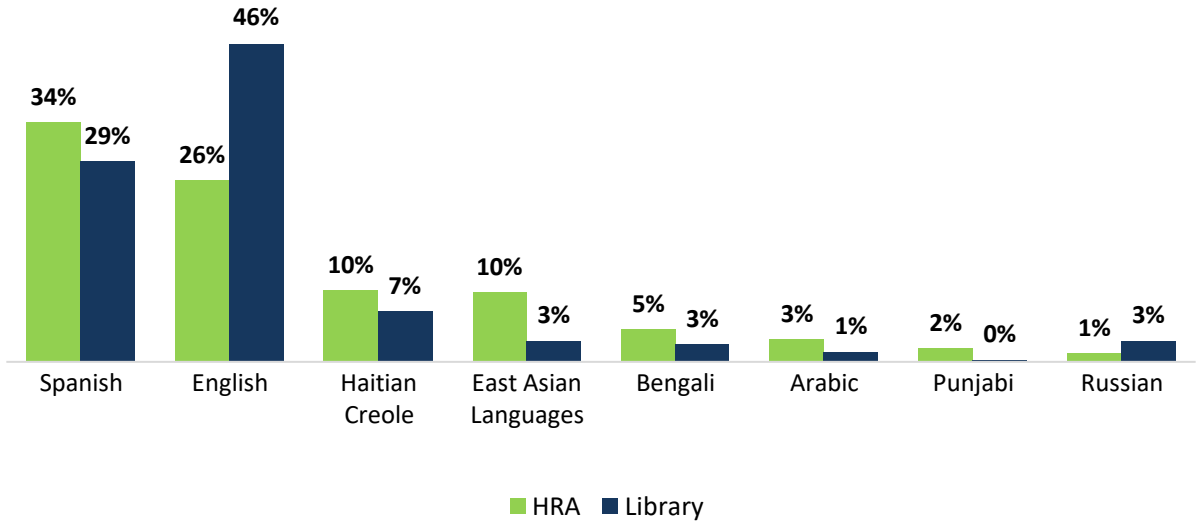


Source: Program documentation provided by the Mayor's Office of Immigrant Affairs and the Human Resources Administration.

Background of Clients Served

In 2019, the most commonly preferred languages of clients served from the DSS/HRA site were Spanish (34%), English (26%), Haitian Creole (10%), East Asian languages of Chinese and Korean (10%), and Bengali/Bangla (5%) (see Figure 3). Across the twelve library branches in 2019, the most commonly preferred languages of clients served were English (46%) and Spanish (29%), followed by much smaller percentages who preferred Haitian Creole (7%), Russian (3%), Bengali/Bangla (3%), and East Asian languages of Chinese and Korean (3%).[14]

Figure 3. Top Preferred Languages of All Clients Served in FY 2019

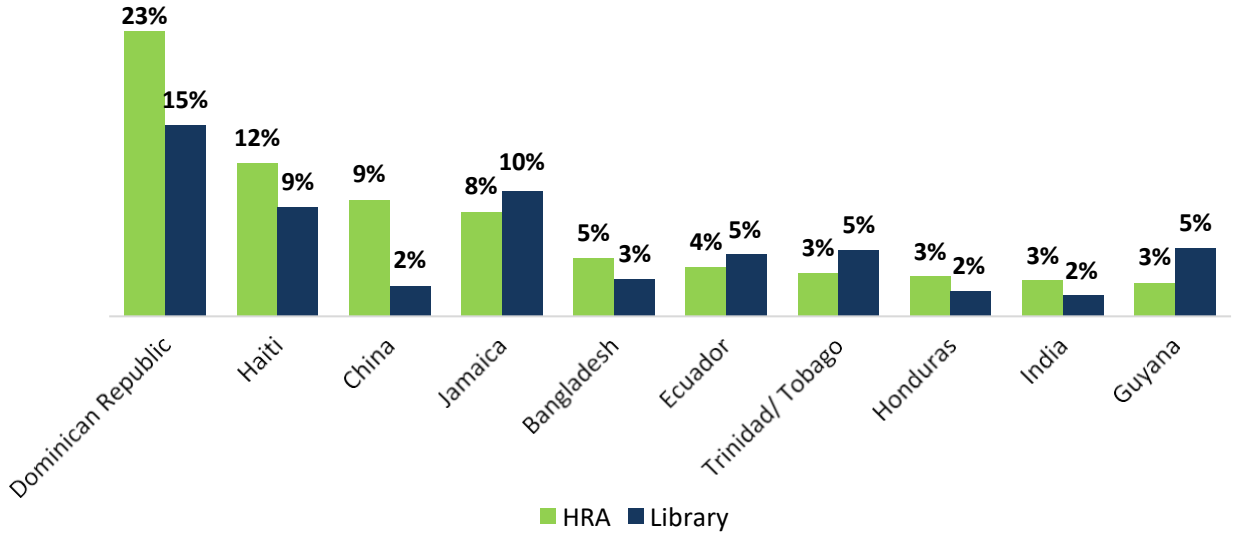


Note: Languages included are those where either the library sites overall or the DSS/HRA site had at least 2% of the clients served represented. East Asian languages include Mandarin, Cantonese, and Korean. Percentages are based on overall clients served. Of note: NYCitizenship served many clients from English–speaking Caribbean countries.
Source: Administrative data from DSS/HRA, MOIA, and NYLAG.

[14] Significance tests were not performed due to the limited amount of data, so interpretation of these differences should be guarded and are based on raw percentage differences.

DSS/HRA clients served in 2019 represented 61 different countries of origin, with the highest percentages coming from Dominican Republic (23%), Haiti (12%), China (9%), and Jamaica (8%) (see Figure 4). Library clients served in 2019 represented 86 different countries of origin, with the highest percentages coming from Dominican Republic (15%), Jamaica (10%), and Haiti (9%).[15]

Figure 4. Top Countries of Origin of Clients Served in FY 2019

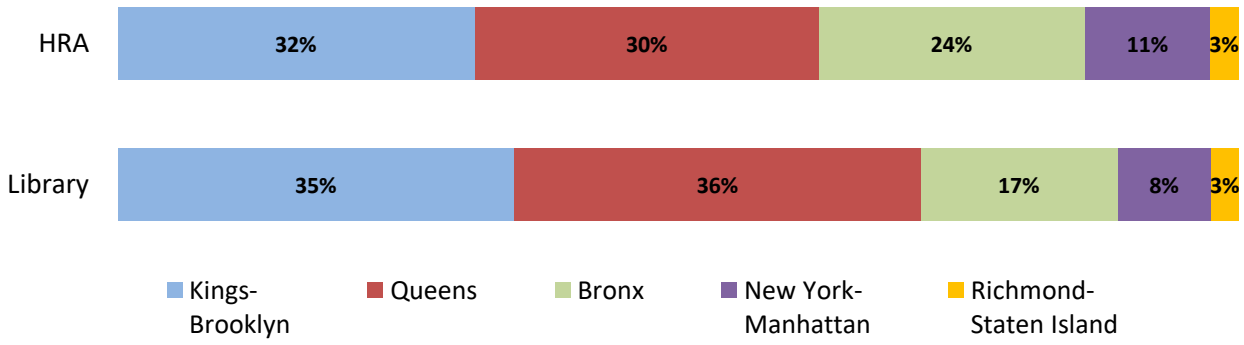


Note: Countries included are those where both the library sites overall and the DSS/HRA site had at least 2% of clients represented. Percentages are based on overall clients served.
Source: Administrative data from DSS/HRA, MOIA, and NYLAG.

[15] Significance tests were not performed due to the limited amount of data, so interpretation of these differences should be guarded and are based on raw percentage differences.

The majority of clients from the DSS/HRA site in 2019 lived in the boroughs of Kings-Brooklyn (32%), Queens (30%), and Bronx (24%), with smaller percentages from New York-Manhattan (11%) and Richmond-Staten Island (3%) (Figure 5). Similarly, the majority of clients from the library sites in 2019 lived in the boroughs of Queens (36%), Kings-Brooklyn (35%), and Bronx (17%), with smaller percentages coming from New York-Manhattan (8%) and Richmond-Staten Island (3%).[16] Both DSS/HRA and the library partners were able to engage individuals across the five boroughs (using a citywide client list and geographically distributed branches, respectively).

Figure 5. Borough of Clients Served in FY 2019



Source: Administrative data from DSS/HRA, MOIA, and NYLAG.

[16] Significance tests were not performed due to the limited amount of data, so interpretation of these differences should be guarded and are based on raw percentage differences.

Findings

Findings from the NYCitizenship program evaluation are organized into the following five sections:

- Outreach and Engagement;
- Community Navigator Model;
- Program Capacity;
- Provision of Legal Services; and
- Elements of the Partnership Between Agencies and Providers.

These sections address the identified research questions and central themes that emerged during the evaluation.

Outreach and Engagement

One of the main objectives of the evaluation was to understand the effectiveness of the outreach and engagement processes implemented at the three library systems and DSS/HRA (see Table B-1 for a list of specific research questions related to this objective). There were several key themes that emerged from interviews with staff, clients, and through review of program data.

Libraries Are Safe Spaces and DSS/HRA Facilities Are Familiar to the Community. Both the library systems and DSS/HRA were described by staff as optimal hosts for the NYCitizenship program due to credibility among the communities targeted for outreach. Libraries are already known as community centers and "safe spaces," especially for immigrant communities. As one Community Navigator from the Brooklyn Public Library explained, *"People trust the libraries because it's a great community source that offers opportunities."* Similarly, program clients recruited through DSS/HRA were described as already having positive and long-standing relationships with DSS/HRA as well as familiarity with the physical DSS/HRA office.

Furthermore, as a result of the central role libraries play in the community and their already existent outreach programs, the three library systems were responsible for almost all outreach and engagement activities (with only limited support from MOIA or other city agencies). Outreach staff

from each library system had flexibility to develop their own outreach strategies. Interviewed stakeholder staff described receiving written materials and resources from MOIA, as well as NYCitizenship branded items for use as incentives during outreach efforts. In addition, the library partners were especially effective because of their ability to merge outreach for NYCitizenship into their existing and ongoing efforts to engage local communities. Within this context, stakeholder feedback suggests that the most effective library outreach came from sites with robust pre-existing programming (such as the Brooklyn Public Library) and those that had pre-existing services, programs, or partnerships that supported the NYCitizenship program (such as a hotline for immigration related information).

Direct Engagement and Word-of-Mouth Are the Most Effective Messaging Strategies. The most effective messaging strategies were those that allowed outreach staff to **interact directly with potential clients**, according to stakeholder staff who were interviewed (although this was not mentioned directly by clients). Through the library partnerships, these strategies included visits to local community groups which were already established partners, face-to-face engagement, and hosting information sessions. Through DSS/HRA, direct engagement took the form of telephone calls used to supplement and reinforce mailed materials. Altogether, direct outreach was described as providing outreach assistants a better opportunity to correctly explain the program, allay fears among potential clients, and immediately address any misunderstandings. Outreach assistants working with DSS/HRA suggested incorporating additional opportunities for direct engagement into their work. Examples provided included in-person visits to clients and face-to-face recruitment tables ("tabling") at DSS/HRA offices.

In addition, multiple stakeholders indicated the **importance of recruiting via word-of-mouth referrals**. By extension, empowering clients to make their own referrals and share information about the program with their friends, families, and communities was an important supportive action that could be taken by the program. Stakeholders suggested developing materials that clients could use to inform others and providing clients with clear information on how those they informed could make initial appointments. As noted by a Branch Manager, "*It is people talking with each other, so definitely word-of-mouth I would say is the primary source of how information gets out there.*"

The importance of word-of-mouth was also evident in statements from clients. Almost half of the clients interviewed who enrolled in the program through the library systems initially heard about the program via word-of-mouth and *then* sought additional information at the library. For example:

- *"I went to do a business evaluation for a small business at a college out here…. While I was there, I heard the Mayor's Office had a program for seniors and I called the library."*
- *"I found out at school. I spoke to the director or advisor there and she helped me with it. I went to the library to meet them."*
- *"My sister is American and she told me about her experience. She told me to try them."*
- *"I only happen to know about it [the program] because I was talking to a friend…. She said 'We have this program, it is NYC, and they call you and they ask you questions and they try to help you.'"*

In addition to the quotes above from library clients, some HRA clients also mentioned learning about the program from a friend or relative (e.g., "I found out through my son"), and several HRA clients indicated their own effort or intent to pass on information about the program to individuals who might benefit from, but were unaware of the program. For example:

- *"When I was telling [some elders] about the program, they were lost. A lot of them didn't know about the program, so I gave them the number."*
- Another respondent decided that once her mother, whom she's helping through the process, receives citizenship, she will introduce others to the program, as *"most of them are receiving public assistance as well [but] they don't seem to know about this program."*

A Combination of Other Outreach Strategies May Help. There were a variety of other outreach approaches mentioned by interviewed clients. For example, library clients indicated they also learned about the program from posters displayed at the library branches and/or while searching the internet. Moreover, several library clients mentioned getting additional information and setting up an appointment by calling 311, which provides information about City services and government programs. In contrast, most DSS/HRA clients interviewed learned about the program from DSS/HRA directly via a letter in the mail and subsequently called to get more information (outreach via mail was viewed favorably among DSS/HRA clients).

Clients Interviewed Suggested a Variety of Additional Messaging Channels to Improve Communication About the NYCitizenship Program. These channels include traditional means

of advertising such as print; television and radio ads; flyers in community spaces and social services programs (e.g., Supplemental Nutrition Assistance Program [SNAP] and Medicare offices); and internet postings. While a few library clients suggested outreach via social media (e.g., Facebook, YouTube) and internet advertisements, one library client explained that people are probably more likely to trust information from print ads. Respondents who mentioned social media (for or against) ranged from the late 20s to the early 50s. Also, another library client added that it is not uncommon for people to ignore text messages which may be perceived as a nuisance to some ("Every day I get different texts on my phone telling me different things, and I don't really go for it.").

Stakeholders interviewed shared additional feedback for increasing the reach of the NYCitizenship program as well as enhancing the effectiveness of the current outreach efforts:

- NYCitizenship, as a program, should implement a broad outreach campaign (including advertisements on public transportation and additional advertisements in ethnic media).
- Each library system should increase publicity of NYCitizenship at branches that are not hosting the program. Stakeholders reflected that the program was insufficiently marketed at library locations where the program was not taking place, which was a missed opportunity.

A wide saturation model incorporating branches that do not host the program would be responsive to the breadth of client residency (see Figure 1).

There Is a Potential Benefit in Tailoring Messages to Subpopulations. Most stakeholder feedback suggests that the same messaging strategies are effective across subpopulations as long as materials are translated accordingly; however, some outreach assistants described tailoring their messaging on a person-by-person basis to emphasize the program benefits that might be most appealing to a particular client. General materials may be supplemented with specific tailoring as part of direct interactions. At least two library program clients noted a need for special or tailored outreach, including the elderly and homeless populations. One client also suggested the city advertise the program in such a way that even those who cannot read and write well also have access to the information.

Additionally, the three library partners have used a variety of media outreach techniques over the years, including social media, press releases, op-eds, postcards, posters, and workbooks. In 2019, this outreach was expanded to include ads in media outlets serving particular communities, such as a

Russian radio station, Chinese and Spanish-language newspapers, and an online journal focused on issues relevant to city residents of Caribbean heritage.

The three library partners distributed a large number of postcards with information about NYCitizenship in between 2017 and 2019, provided by MOIA. The majority of these postcards were sent in English and Spanish, but in 2018 and 2019 these postcards also included versions in Chinese, Russian, Bengali, Haitian Creole, Korean, French, and Arabic. Additionally, the 2019 postcards included versions in Urdu and Polish. In 2019, 12 library sites were provided with posters in Spanish, Chinese, Russian, Haitian Creole, Bangla, French, and Arabic as a part of their outreach efforts. The three library partners also used workbooks (i.e., branded packages of resources and guidance) designed to support client preparation as an outreach tool. In 2019 these workbooks were translated into several languages and distributed in English (1,200), Spanish (900), Chinese (600), Russian (300), and Haitian Creole (300). The workbooks were provided directly to clients at information sessions.

East Asian Immigrant Communities May Not Be Reached as Effectively Through the Library Partnership. Although the NYCitizenship program is described as generally reaching all intended communities, some stakeholders reported that the overall program may not have reached East Asian immigrant communities as effectively. Three reasons were given for this gap in outreach:

- East Asian immigrant communities were described as particularly insular and requiring a greater degree of relationship building before outreach would become effective. A solution provided by stakeholders was greater partnership with local community organizations (e.g., Chinese Community Center) embedded within hard-to-reach communities.

- The NYCitizenship program was described by many stakeholders interviewed as lacking the language capacity necessary to reach the diversity of NYC residents. In particular, the overall program was described as under-resourced with respect to the breadth of languages offered when engaging East Asian-language speaking community members. NYCitizenship resources provided through MOIA were described as insufficiently tailored to East Asian languages as well. Finally, using an independent language-line to facilitate conversations with clients who were not comfortable speaking English created added challenges for the outreach staff and legal teams. For example, using the line resulted in significantly lengthened meetings and created opportunities for mistakes due to the intricacies of translating legal wording. Multiple stakeholders requested additional language supports to address this challenge.

- One critique of the NYCitizenship program by stakeholders is that it did not select enough library-based locations within East Asian communities and outreach was otherwise absent. One stakeholder elaborated: *"The Chinese-speaking communities in Brooklyn were not targeted at all. There was no outreach."* Stakeholders noted that libraries were chosen in part based on their capacity to host the program, potentially excluding smaller branches in East Asian neighborhoods like Sunset Park, Brooklyn.

The DSS/HRA program site had more success in reaching East Asian communities. While race and ethnicity data were not available for this evaluation, language data on DSS/HRA clients served in 2019 show that 10 percent of all DSS/HRA clients served through NYCitizenship spoke Chinese or Korean, compared to 3 percent in the library sites (see Figure 3).[17] Among clients served who indicated a preferred language other than English (i.e., English was not their primary preferred language), close to half spoke Spanish and approximately one in four spoke an Asian language (including 14 percent who spoke Chinese or Korean).

Findings specific to the DSS/HRA approach. DSS/HRA's approach elicited several outreach and engagement findings:

- **The use of a pre-existing client list by DSS/HRA was an effective recruitment practice**. It allowed DSS/HRA to conduct direct outreach with a pool of eligible individuals and to focus on individuals with whom they have an active relationship. By extension, this gave DSS/HRA the opportunity to better leverage its credibility as an institution. The transference of this credibility and trust from DSS/HRA to NYCitizenship was especially important because, for many clients, the difference between DSS/HRA and the legal service provider was unclear (i.e., stakeholders reported that many clients believed the legal services were being provided by DSS/HRA directly).

- **DSS/HRA also took advantage of ongoing engagement-related approaches.** For example, the legal team working with DSS/HRA had the ability to meet clients at their homes, thereby accommodating homebound individuals. Also, the outreach assistants working through DSS/HRA, similarly to those working through the library partnerships, had the capacity to remind individuals of their upcoming appointments and use text, phone, and letters to ensure that the individuals are prepared and notified of their upcoming appointments. This additional work done prior to the intake appointment led to more effective engagement with the legal teams.

Outreach and Engagement Challenges. There were several roadblocks mentioned in stakeholder interviews:

[17] Significance tests were not performed due to the limited amount of data, so interpretation of this difference should be guarded and are based on raw percentage differences..

- Need for additional outreach and recruitment materials, including tailoring to particular languages or demographics;

- NYCitizenship operated alongside other citizenship-focused programs in NYC, run by city agencies and community-based organizations, some of which shared similar messaging and target populations. This led to confusion among clients and community members in certain instances, which could be solved by adding more program-specific details to publicly available materials, posters, and signs;

- Within the libraries, there is potential for client attrition when outreach and recruitment is conducted by one program partner and scheduling of intake appointments is conducted by a different program partner. Specifically, stakeholders reported that clients were often confused when they were asked to call the 311 hotline to schedule their appointment instead of being able to schedule directly with the library outreach assistant who informed them of the program.

- Program materials should more explicitly name NYLAG as the legal services provider. According to NYLAG stakeholders and library branch managers, it would benefit the program if clients more clearly understood that NYLAG was providing services at library and DSS/HRA locations (as compared to the perception among many clients that library branch or DSS/HRA staff are providing the legal services directly). Clients would be more likely to pursue additional services if it was evident that NYLAG was providing the legal services given NYLAG's purported place of trust in the community. Also, by naming NYLAG as the legal service provider, clients would be less likely to pursue library staff with questions and/or arrive unexpectedly.

Community Navigator Model

Another objective of the current evaluation was to understand the implementation of the Community Navigator model to identify best practices and lessons learned, as well as any structural barriers. There were several key themes that emerged from interviews with staff and clients.

The Community Navigator Model was Custom-Fit to Meet the Needs of the NYCitizenship Program. Prior to their introduction in 2017, MOIA recognized the necessity of expanding the legal services component of the program. With the success of the outreach and recruitment efforts, it was important for NYLAG's legal teams to be fully supported in their efforts to provide legal representation. As such, NYLAG hired 12 Community Navigators with linguistic fluency (through funding from NYC Opportunity) and adapted their responsibilities to fit the structure of NYCitizenship. Community Navigators were solely assigned to the legal teams as employees of NYLAG and each of the four legal teams integrated their two assigned Community Navigators accordingly. Certain activities – otherwise understood as part of a Community Navigator

position more generically – such as community outreach and coordination of referrals, continued to be provided, primarily, through the partnerships with NYC's three library systems.

Community Navigators are Perceived to Increase Program Efficiency. Including Community Navigators with linguistic fluency provided necessary staff support and allowed attorneys to focus on specific cases more selectively. This became especially important because the frequency and difficulty of "complex" cases seen by NYLAG legal teams increased. Complex cases, in this context, include those that require FOIA requests, medical certifications for disability exceptions, concurrent application to renew I-90/green cards, and clients for whom pursuing citizenship may put them at risk due to their immigration or criminal history.

A consensus opinion from interviewed stakeholders was the difficulty of scheduling follow-up appointments, especially because priority went to filling each spot with new clients. The addition of trained and effective paralegals made the client scheduling process somewhat manageable. Without the Community Navigators, it would have been impossible to balance both the new and continuing clients.

Lack of Independence by Community Navigators at NYLAG Can Be an Impediment. The inability of Community Navigators at NYLAG to work independently of the attorneys may be a roadblock to efficient implementation. Due to their training and position as paralegals, Community Navigators provide a valuable service yet work under the close supervision of attorneys. As such, the Community Navigators are essential for supporting the administrative work and for monitoring ongoing cases, but are less essential for client intake and developing naturalization applications. As explained by one attorney, "Navigators are good at intake, but I feel much better when I do it." Several reasons for this were offered, including the differences in training and experience held by the attorneys compared to the Community Navigators as well as the fact that the attorneys were, regardless of who completed the applications, the legal representatives of the clients. At the time of the evaluation, additional training for Community Navigators was planned and a decision of whether or not to give Community Navigators the opportunity to legally represent clients (through Department of Justice Accreditation) was also being considered, for the purpose of increasing program efficiency and capacity.

Community Navigators Independently Worked to Provide Clients with Additional Information about Services Available to Them. Community Navigators described informing clients where to go to obtain personal documents, how to connect with City agencies, and where to receive necessary social services. Yet, Community Navigators also shared that they learned of these resources through independent online research and were not trained or supported for this role.

Client Experiences. Several clients we spoke with (seven library, eight DSS/HRA) also recalled or implied working with a Community Navigator or paralegal.[18] Of those who worked with a Community Navigator, the following experiences were noted:

- The frequency of contact with Community Navigators varied (anywhere from 2-3 times a month, to 1-2 times overall).
- It was generally not difficult to access the Community Navigator and/or lawyer and staff reportedly were very responsive.
- Clients often viewed Community Navigators as useful to the program and often described them as effective, helpful, and professional.
- Almost all of the clients who worked with a Community Navigator reported receiving services in their preferred language; however, most Chinese-speaking clients reported not receiving services in their preferred language. Services were provided in English, which clients understood or had family members available to translate; however the preference was their first language (i.e., Mandarin or Cantonese).

Program Capacity

Understanding issues related to program capacity provides insights into NYCitizenship program functions and limitations. There were several key themes that emerged from interviews with staff, clients, and the analysis of program data which provided insights into the overall service capacity of the program.

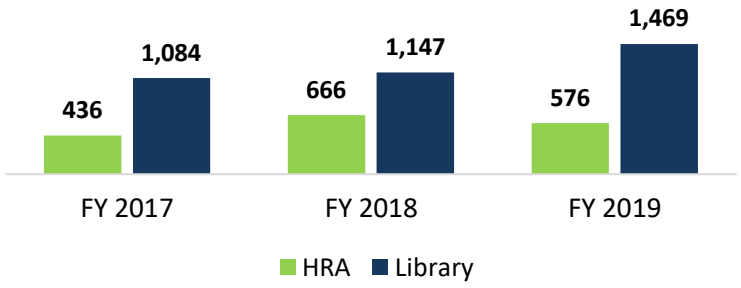
[18]English-speaking and Chinese-speaking interview clients were asked explicitly by the interviewer if they worked with a Community Navigator or paralegal; however, Spanish-speaking interview clients were not asked this question directly. Their response to this question is based on implications made throughout the interview that they worked with a Community Navigator/paralegal. As a result, the number of persons who worked with a paralegal may not be accurately reflected in this count.

The NYCitizenship Program Reached or Exceeded Service Capacity. [19] Interviewed stakeholders from the legal service provider unanimously believed that under the current model, with the current staffing structure, the program was serving the maximum number of clients that could be effectively provided legal services at any given time. Staff were working at capacity, with the primary limitation being the administrative work needed to support the application submissions (including FOIA requests, monitoring of correspondence with USCIS, entry of supporting documentation into the case file, client correspondence). In fact, multiple stakeholders noted that the program was operating effectively in part because not all intake appointments, which were set by the contract requirements, were filled each week. If all potential intake appointments were filled each week, through improved outreach and engagement, then stakeholders report that the program may no longer be able to effectively address the current caseloads and/or continue to assist clients with complex cases:

- *"The biggest issue is the caseload. We could give more time to the clients we already see if we had a lesser caseload – even with the no-shows." – NYLAG Attorney assigned to the NYPL legal team*

The number of intake appointments completed increased each year across the 12 branches, while at the DSS/HRA site there was a strong rise and then a lighter drop into 2019. Figure 6 shows the number of intake appointments completed by location (library branches vs. DSS/HRA).

Figure 6. Intake Appointments Completed by Location

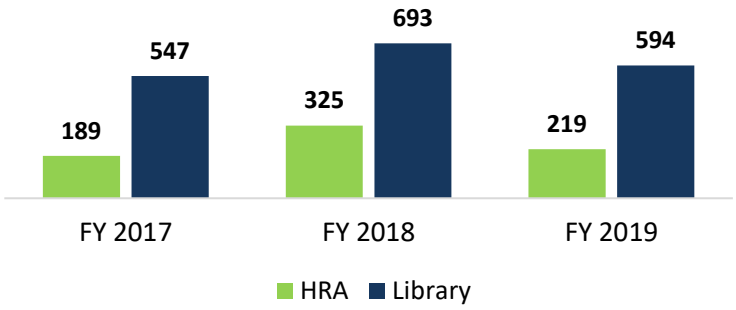


Note: There were three legal teams assigned to work with the library partners (one for each library partner, working in four library branches each), whereas the DSS/HRA attorney and two Navigators were at one site.
Source: Administrative data from DSS/HRA, MOIA, and NYLAG.

[19] Program capacity is defined here as the capacity for the program to effectively service clients. This does not necessarily equal the number of clients that could, procedurally, be served by the program but instead recognizes that staff resources are finite and at a certain point, the effectiveness of the legal representation is jeopardized if caseloads grow too large.

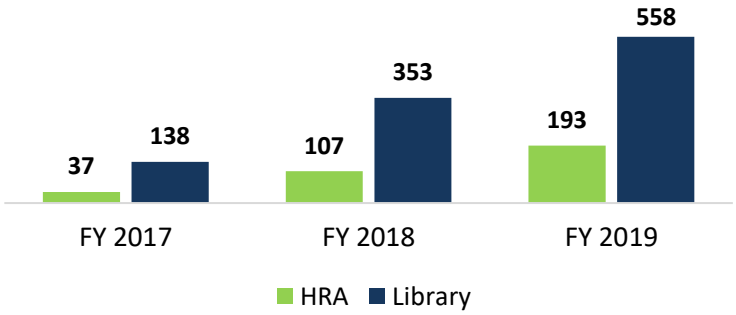
As shown in Figures 7 and 8, the number of citizenship applications filed by both DSS/HRA and Library components was much higher than the number of citizenships that were granted. For example, only 337 citizenship applications filed by the DSS/HRA component were granted (out of a total 733 filed between 2017-2019). Overall, the number of citizenships granted increased in both 2018 and 2019, indicative of an increase in the use of services, and of a delay between application filing and federal approval. The lag time can be longer for applications that include medical certifications for disability exceptions, which were common in the DSS/HRA component given the populations reached.

Figure 7. Citizenship Applications Filed



Note: Numbers are of applications filed in the period, client retained in any period.
Source: Administrative data from DSS/HRA, MOIA, and NYLAG.

Figure 8. Citizenships Granted



Note: Numbers are of clients naturalized in the period, client retained in any period.
Source: Administrative data from DSS/HRA, MOIA, and NYLAG.

Difficulty managing caseloads was reportedly due to: a lack of administrative time for filings; cases that were increasingly complex or required multiple applications (e.g., FOIA requests, I-90/green card renewals, medical certifications for disability exceptions) that are not accounted for in program metrics; and additional clients added weekly at a rate greater than existing cases are closed. In the current model, library attorneys and Community Navigators spend 2 days a week working on administrative work to prepare and review applications, advise clients over the phone, and fill out I-90/green card forms. Additionally, potential walk-in clients make it difficult for Community Navigators and attorneys to ease their caseload.

- *"Our average caseload is about 100+ people, and we're seeing new people every week. We still have to manage a caseload from previous years, and see new people. We can't follow up because we have to file for the deliverables, while the caseload continues to increase." – NYPL Community Navigator.*

- *"Our jobs have gotten harder, but the deliverables don't reflect that. The regulation of the I-90 for citizenship makes the process harder…I don't think the program is well equipped for the quantity." – NYLAG Attorney. assigned to the DSS/HRA legal team*

Furthermore, stakeholders believe the program should reconsider how program targets are set (which define how MOIA views the program's capacity) to account for program accomplishments other than submitting citizenship applications (such as facilitating I-90/green card renewals). Interviewed stakeholders spoke of a need for greater cohesion between the deliverables for which NYLAG is accountable and the actual services being provided. For example, NYLAG stakeholders unanimously indicated the importance of recognizing the I-90/green card renewal applications being submitted through NYCitizenship because it is a necessary pre-requisite to submitting a citizenship application, because of the value to clients, and because of the effort it entails. Otherwise, stakeholders noted that definitions of capacity would not appropriately reflect the work being undertaken. Average caseload held by each legal team was also recommended as an additional metric. Otherwise, stakeholders advised, pressure to meet quotas for client intakes would lead to caseloads continually increasing in an unsustainable manner.

Program Capacity in the Library Component is Also Limited by the Available Space for Hosting NYCitizenship Appointments. Interviewed stakeholders reported that although the current library spaces are adequate, it was a challenging process to identify appropriate library

branches with adequate space and that space constraints across the three library systems partially dictated the location of services (compared to strategic decisions based on community need). In addition, because conditions at library branches continued to evolve over time and legal teams continued to increase in size (i.e., outgrowing the original space), library branch managers and NYLAG legal teams continued to encounter challenges around how the spaces were being used. Space within each library branch was described as being in high demand and schedules often had to be shifted to accommodate various obligations. If the staff capacity to provide legal services was increased, a capacity-limit on library space would likely remain.

Provision of Legal Services

Understanding issues related to providing legal services offers insights into the NYCitizenship program's functions and limitations. There were several key themes that emerged from interviews with staff, clients, and the analysis of program data that provided perspective on legal services provided to clients of the program.

Structure of Representation. Legal services were provided through teams of attorneys and Community Navigators, three of which were assigned to the libraries (one to each library system that served 12 libraries) and one of which was assigned to DSS/HRA. While the overall mandate and responsibilities of the teams remained consistent, each team operated in slightly different ways. Teams also had a great deal of autonomy to determine their own approach, which was guided by the experience of the lead attorney. For example,

- Teams differed in whether or not attorneys provided in-person accompaniment during interviews. The attorney working with DSS/HRA accompanied certain clients when their cases (e.g., regarding Disability Exceptions) were especially complicated. While this approach provided substantial added value, it was also challenging from a capacity perspective.

- Teams also differed in the extent to which attorneys or paralegals carried out the comprehensive intake interviews with clients. Within this context, attorneys differed in their opinion as to who was better qualified – attorneys or Community Navigators – to lead these conversations.

General Service Provision Impacted by Legal Services. The NYCitizenship program is partly defined by the strategic decision to provide the legal services on-site at the partner organizations (the libraries and DSS/HRA). While this decision had clear benefits and was consistent with the

partnership model, it resulted in several challenges. In particular, legal teams reported difficulty obtaining the necessary privacy to effectively meet with multiple clients at once (if accompanied by family members, for example) and were sometimes unable to access resources (e.g., private storage areas, staff bathrooms). This was the case for both libraries and DSS/HRA. In addition, teams often had difficulty coordinating their time with other uses of the shared spaces. Finally, legal teams encountered considerable technological challenges (e.g., no internet connection) that reduced their ability to effectively organize documentation during intake appointments. However, it is also important to note that MOIA was described as generally open to addressing challenges related to the partnership with the City's three library systems when informed of the concerns by the legal teams. In addition, staff from each partner were also described as committed to addressing challenges faced by the legal teams. Many of the challenges, however, were due to the nature of the partnership itself (e.g., the placement of legal teams within library branches that were not designed for the provision of private consultation) and therefore could not be easily addressed.

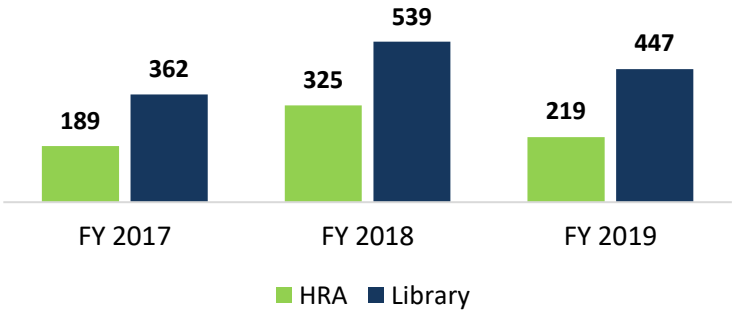
Client Experiences. In general, clients – regardless of organization (library or DSS/HRA) through which they accessed the program, language spoken, age, etc. – overwhelmingly reported positive experiences participating in the NYCitizenship program. They spoke most highly about interactions with the staff, describing them as kind, professional, responsive, approachable, and helpful. Below are just a few examples of clients' remarks about the program staff's customer service:

- *"[The program staff] help people. They are nice. They care about people."*
- *"The care provided by the [lawyer] and her assistant [was] very patient. They explained things in Spanish and English. I was delighted by the customer service from her assistant."*
- *"The [person] I spoke with was very nice. She completed the form for me. She explained all the questions that I didn't understand. She explained the process to me, such as how long it would take, that I couldn't travel. In other words, they explained everything to me very well and they helped me quite a bit."*

Some clients also expressed gratitude for the financial assistance (i.e., fee waivers). The majority of clients interviewed were eligible for a full fee waiver and completed, or were completing, the naturalization process free of charge (Figure 9 shows the overall number of fee waivers filed). One client noted, *"Honestly, it would have been very difficult for me [without the NYCitizenship program]. Just the legal fees would have been $3,000 to $3,500, from what I learned asking around. It is a good option, because honestly, paying a lawyer $3,000 is not in my budget."* Another client noted, that *"…I have wanted to become a*

citizen for some time, but I didn't have much saved up and many places charge a lot of money to help fill out the application." And, another client stated *"I started [the application process] 15 years ago and I didn't go through with it because of the cost."* Although the potential for fee waivers did not seem to be explicitly part of the branding and advertising in all cases, outreach assistants would discuss hesitations around application cost and note possible NYCitizenship program assistance.

Figure 9. Fee Waivers Filed



Note: Numbers are of applications filed in the period, client retained in any period.
Source: Administrative data from DSS/HRA, MOIA, and NYLAG.

Many clients interviewed explained that naturalization would not have been possible without help from the NYCitizenship program. Even among those who believed they would have gained citizenship without the program, a few admitted it would have been much more expensive and time-consuming alone.

The large majority of clients interviewed stated they would recommend the NYCitizenship program to others; many have already done so.

While clients who were interviewed typically spoke highly of their experiences with the program, there were also challenges mentioned:

- Gathering and **submitting documentation proved to be challenging** for many. There were a few instances in which clients believed the staff could have been more effective communicating what documents to submit, ensuring there were no errors in the submissions, and alerting clients in advance and/or all at once what was missing (rather than going back and forth to provide documents). To add, preparing documentation may be an **additional burden for persons with certain disabilities**, who sometimes need additional documentation, if it is not clear what documents are needed.

- Some clients experienced ineffective communication and non-responsiveness (which contrasted with responsiveness noted in the Community Navigator section). Several clients reported difficulty accessing their assigned contact (clients specifically mentioned a caseworker, lawyer, case processors or others who would know the status). More than one client mentioned making multiple attempts via phone and email to reach program staff, but doing so unsuccessfully and not receiving a reply. Additionally, several clients mentioned a lack of application status updates, effectively "waiting in the dark, waiting to see what's going to happen." One client shared, "*We understand that it takes time, but they could send out notices to explain the status of your case. Communications should be more open so clients can understand the status of their application."* However, this challenge may be directly linked to the high caseloads previously mentioned.

- A few library clients also noted meeting logistical challenges traveling to and while at meeting locations (e.g., no elevator access, long travel times). For example, one client's daughter, who spoke on her behalf, shared the following experience of her 88-year-old mother:

  - *"We've been there for like [four interviews] and it's all in different libraries. So, that, again, is very taxing…. Somebody at that age doesn't have anyone to help them [and] no way of getting wherever they're supposed to go…. [Then], when you go to the library, basically all the rooms [where they] are doing the cases are always in the basement. And at one point, when we went to Flushing, the elevator was not working, so she had to go up three long flights of steps."*

- Additional challenges noted by clients included the amount of time and the number of appointments it takes to complete the process, as well as language barriers, for which one respondent suggested the program create a guidebook or a set of guidelines available in multiple languages. These additional challenges are representative of overall barriers to gaining citizenship, but also can be important for a program's efficacy in meeting challenges of clients.

Complexity and Policy Challenges in Providing Services. The legal needs of clients were found to be more complex than originally expected, which required significant more legal-service and administrative time to address. In fact, the program model did not seem to account for this complexity when setting annual expectations/targets for the number of cases completed because all cases were treated equally and targets required continuous intake of new clients regardless of how many cases remained open within a legal team's portfolio. Legal teams reported encountering the following major challenges when serving clients:

- Clients often had to first renew their I-90/green cards before applying for citizenship**,** the result of relatively recent policy enforcement by the current presidential administration which thereby required NYLAG legal teams to file far more I-90/green card applicants than originally expected and delay the filing of the N-400 application.

- Legal teams found themselves needing to submit FOIA requests on a regular basis. This legal tool was used to help ensure that the citizenship applications were fully accurate and was deployed when clients did not have enough clarity about their own legal histories. FOIA requests were time-consuming for legal teams to prepare and also extended the time between an intake and submission of a citizenship application while the legal teams waited for results. FOIA's were also extremely lengthy at times, sometimes legal teams reviewed over 200 pages worth of official documents.

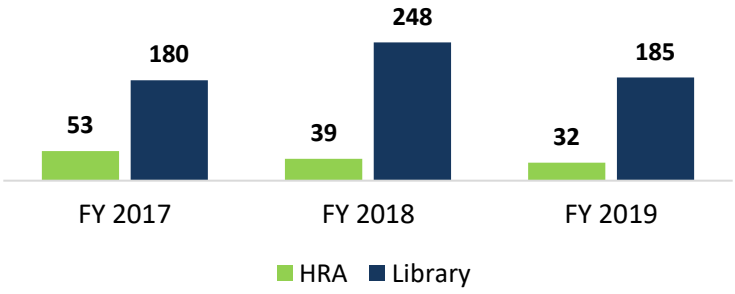
- The medical certification for disability exceptions was labor-intensive. Legal teams also found themselves working closely with various medical professionals to procure the disability exceptions necessary for clients. This was a particularly complex challenge for the legal service provider, as NYCitizenship did not have any ongoing relationships with medical providers and was particularly challenging for the legal team assigned to DSS/HRA, which encountered the greatest number of these situations due to the clients being served.

The current political climate, the rapidly shifting national discourse on immigration, and changes to expected federal policies led to increased complications for the legal services provider. Stakeholders explained, for example, that they could not always advise potential clients to pursue an application due to the risks it may pose due to a client's immigration or criminal history or for some other reason (a circumstance that was not accounted for in the contract deliverables, which only recognized number of applications submitted, but not applications withheld after advisement of potential clients).

Findings Related to Financial Counseling. Financial counseling was considered an important program component by interviewed NYLAG staff because of the frequency in which tax-related issues could otherwise impede a citizenship application. The program was originally designed to include a robust financial empowerment component because gaining citizenship often leads to increased access to various government benefits. Such activities include working with clients to learn how to manage, prioritize, and pay down debt; creating and maintaining a budget; helping to establish a savings plan; and, providing guidance on establishing and improving credit. Over the duration of the program, the role of financial counseling was refocused towards helping to resolve any tax- or finance-related barriers to citizenship that were preventing clients from submitting their applications. Clients did not mention financial counseling directly. See Figure 10 below for number of clients who attended financial counseling services, including meetings, and coaching sessions. Stakeholders suggest that DSS/HRA clients were less likely to attend counseling sessions due to

difficulty traveling to locations where services are provided (as financial counseling was offered at libraries, not at DSS/HRA)[20].

Figure 10. Initial Financial Counseling Sessions Attended



Note: Numbers are of initial sessions in the period, client retained in any period.
Source: Administrative data from DSS/HRA, MOIA, and NYLAG.

Elements of Effective Partnerships Between Agencies and Provider

The key aspect and overall success of the NYCitizenship model was largely dependent on partnerships. Many of the program's strengths were the result of how the partnerships were managed. The NYCitizenship model was anchored by the partnership between the legal service provider, NYLAG, and the credible institutions (DSS/HRA and the three library systems) through which clients were reached. Each partner organization was invited or chosen to be in the partnership due to its particular strengths.

Libraries were valuable partners and are often seen as community centers and safe havens by immigrants. Leveraging that natural place in the community was a benefit to the NYCitizenship program. According to the Program Manager at MOIA: *"Libraries, over the past decade have become hubs for immigrants to be able to access a myriad of resources, such as workforce development, English as a second language, and literacy classes... [So, the library is] not only a learning center or a place where you can do research and access a computer, which is also very important, but is also [a place for] resources that'll help you be more integrated into*

[20] Includes 12 library sites (Bronx Library Center, Flatbush Library, Kings Highway Library, New Utrecht Library, Eastern Parkway Library, Inwood Library, Science, Industry and Business Library, Queens Central (Jamaica), Flushing Library, Jackson Heights Library, Astoria Library, and St. George Library) and only one HRA site.

American society. And on top of that, the [libraries are] providing a sense of safety and familiarity for immigrant New Yorkers, [allowing them] to be able to feel safe in their communities."

In addition, DSS/HRA as a partner provided several intangibles related to providing services and benefits: a respected reputation among the immigrant community, helpful information to reach vulnerable populations, and connections to a variety of communities. According to the Program Manager at MOIA: *"DSS/HRA serves our most vulnerable populations in New York City. They administer a lot of the benefits that we know immigrant New Yorkers use…So when it comes to the partnership, we knew that having an agency that's very well-connected to a lot of communities, as well as has a lot of the information that's necessary to reach these vulnerable populations, [would be advantageous]."*

For the library component, shifts to the use of 311 and other hotline services as partners resulted in several tensions within the model. According to interviewed stakeholders, points within the program where clients were required to switch their primary points of contact were often challenging. This was described as especially apparent during scheduling and outreach when clients first engaged by one of the three library partners were asked to call 311 or another hotline service to schedule their intake appointment. Furthermore, outreach staff across three library partners described a challenging level of ambiguity concerning the division of responsibilities between their own teams and the 311 and hotline staff, specifically around the booking of appointments. Finally, interviewed stakeholders from the legal teams reported that clients who first learned of NYCitizenship through 311 or one of the hotlines (as compared to through a library outreach worker or other library-sponsored outreach) were often less likely to be prepared for their first appointment or were less likely to be appropriate candidates for the program. As a result, stakeholders recommended that scheduling responsibilities remain with the same program partners responsible for outreach and engagement.

Effective Practices for Cultivating Partnerships. Four effective practices for cultivating strong partnerships emerged through the evaluation. Evaluation findings also indicate that these practices were driven and largely supported by the program's leadership and the work of MOIA. Attention was given to supporting each partner organization's needs and objectives while also setting clear expectations to the extent possible. The four effective practices are as follows:

- **Ensure That the Program Adds Value for Each Partner.** Interviewed stakeholders unanimously reported that the program added value to their own organizations and agencies and that this was one reason for the NYCitizenship program's success. Each

partner organization had independent programs dedicated to helping community members and was able to align the work of NYCitizenship with these pre-existing goals. The NYCitizenship program also benefited DSS/HRA by increasing clients' trust in DSS/HRA as an agency. To that extent, the transference of credibility went in both directions (both from DSS/HRA to the program and from the program to DSS/HRA).

  - [*NYCitizenship clients] probably have a higher level of trust with DSS/HRA… So [NYCitizenship clients] are able to see that the agency is really working for them, and that we're really trying to alleviate poverty. But also just trying to really make them feel secure, and– just providing these free legal services, and providing fee waivers to really help their lives…So I think [partnering with NYCitizenship leads to a] higher level of trust in the agency. – DSS/HRA Stakeholder*

  - Queens Public Library, Brooklyn Public Library, and the New York Public Library each described their own organizations as providing a broad range of community services designed to support the needs of all New York residents. Partnering with NYCitizenship provided an advantage for the library systems as a whole (e.g., by supplementing their programs for immigrant communities) and for the participating branches (which were able to increase their specific offerings).

  - NYLAG was able to increase scope of services and had an opportunity through NYCitizenship to enlarge its citizenship-focused service area.

- **Value Each Partners' Strengths.** Stakeholders expressed appreciation that the program valued each partner organization's strengths and assigned responsibilities accordingly. Examples included using the existing contact information for DSS/HRA clients when conducting outreach and employing the outreach assistants positioned at each library to lead the community engagement efforts.

- **Maintain Clear Boundaries of Responsibility Between Each Program Partner.** Stakeholders valued the differentiation of responsibilities across the program. For example, interviewees from NYLAG were unanimous in their belief that their time was best spent providing legal services and not in outreach and recruitment efforts. Similarly, other stakeholders were equally supportive of bringing in an independent organization to provide legal services.

- **Maintain Strong and Open Lines of Communication at Multiple Levels.** Communication was largely described by stakeholders from each organization as positive. Stakeholders reported being able to contact their counterparts as needed, and MOIA as the lead agency was described as accessible and responsive. In addition, partners were able to collaborate on strategic efforts when appropriate (such as joint outreach campaigns). Finally, partners communicated both at the leadership and staff levels, which was important for the program's success.

Recommendations for Replication

Overall, NYCitizenship provided a valuable service that is respected and valued by both those served and the program's implementing partners. There was and continues to be a need for dedicated legal services for lawful permanent residents seeking citizenship and the NYCitizenship program effectively met this need in an intentional and deliberate manner. From the selection of program partners – the Brooklyn Public Library, New York Public Library, Queens Public Library, DSS/HRA, and NYLAG – to MOIA's facilitation and leadership, the NYCitizenship program was strong in its efforts to engage with immigrant communities and support their efforts to naturalize. Table 1 provides total numbers since 2017 in several program outcome areas (several of these areas are discussed in more detail in earlier sections).

Table 1. Program Outcomes

Metric	Totals Since FY17
Individuals reached (via hotline + letters)	34,302
Individuals screened	6,103
N400s filed	3,218
Fee waivers filed	2,502
Individual Financial Counseling sessions (one on one)	829
Total Financial Counseling sessions (including follow up)	1,851
Information sessions (including attorney + libraries)	286
Individuals granted citizenship	1,818

Outreach and engagement efforts, largely overseen by the libraries and DSS/HRA were found to be generally effective (although limited within some immigrant communities), and the program was found to be running at its capacity, serving additional clients as NYLAG staff maintained their open caseloads. In addition, the Community Navigators were found to be essential members of the program's legal teams due to their role as qualified paralegals equipped to manage both client interaction and the administrative support necessary to maintain the program's caseloads.

The NYCitizenship program provides a model that municipalities can consider as a way to benefit their local immigrant communities. As this program is looked to by other municipal governments, we provide lessons learned, recommendations, and advice for replication.

Lessons Learned and Recommendations

Based on our evaluation of the NYCitizenship program, the Westat-Metis team offers several recommendations with respect to the NYCitizenship program, use of the Community Navigator model, and overall outreach and engagement that can be used by municipalities interested in replicating the model. Although the lessons learned and recommendations below mention specific processes and partners of NYCitizenship, the overall lessons are generalizable to other communities and municipal structures.

Create Partnerships with Credible Institutions and Leverage Additional Partners. Credible institutions were the primary mechanism for reaching immigrant communities in the NYCitizenship program. Others considering similar approaches should coordinate outreach and engagement in partnership with similar credible institutions in their communities. Furthermore, multiple partners can be leveraged to fill gaps in service provision. For example, in our evaluation of NYCitizenship, multiple stakeholders recommended exploring how the City could facilitate obtaining support to file Disability Exceptions, possibly through a partnership with NYC Health + Hospitals (e.g., by creating an office or medical liaison that could support these requests)[21].

Make Clear Through Branding the Involvement and Role of the Legal Service Provider. Attorneys and Community Navigators indicated that clients were generally unaware of NYLAG's involvement in the NYCitizenship program. Clients most often conflated NYLAG with either the library or DSS/HRA and believed that they were receiving legal services directly from those

[21] Officially known as the New York City Health and Hospitals Corporation (HHC), NYC Health + Hospitals operates the public hospitals and clinics in New York City as a public benefit corporation. HHC is the largest municipal healthcare system in the United States serving 1.4 million patients, including more than 475,000 uninsured city residents. HHC services have been interpreted in more than 190 languages. Created in 1969 (Chapter 1016 of the Laws 1969), HHC operates eleven acute care hospitals, five nursing homes, six diagnostic and treatment centers, and more than 70 community-based primary care sites, serving primarily the poor and working class.

organizations. This led to several unintended consequences which could potentially happen in similar program structures:

- Clients were impeded in their ability to be effectively connected to additional legal services through NYLAG (the legal services provider).
- The program was without the ability to recruit clients using NYLAG's own positive reputation and strong credibility within target communities.
- Clients occasionally showed up at the DSS/HRA site or a library branch unannounced (and on days where no services were being provided) expecting to be able to speak to staff about legal assistance. In addition, clients were more likely to express frustration to library staff about scheduling, legal matters, or other program elements outside of the branch managers' control.

Legal Teams Need to Be Provided With High Quality Spaces to Work And Access to Technology. The location of the legal service provision at the credible institutions – DSS/HRA and the twelve library branches – was key to the NYCitizenship model. Interviewed stakeholders were largely satisfied with this arrangement and believed that it strengthened the overall approach. However, legal teams from both the libraries and HRA also faced challenges due to the inadequacy of facilities. For example, teams were sometimes confronted with spaces that were too small and/or did not provide enough privacy for teams to meet with more than one client at a time. In addition, spaces offered at the libraries were sometimes unwelcoming (e.g., without windows, in basements, without access to restrooms). Furthermore, spaces were often without internet access or a place to store paperwork and equipment. Similar programs should endeavor to find welcome spaces with adequate resources, proper technology, and connectivity.

Legal Teams Need Appropriate Paralegal Support Which Could Also be Enhanced with Community Connections. A central objective for the current evaluation was to examine the viability of the Community Navigator model. One issue was around implementation of the Community Navigator model in a citywide context (without the local community connections originally envisioned). As implemented, the Community Navigator model centered on administrative support which was critical to the success of the program and likely any future recommendations. The key value added was through the support provided as paralegals and we strongly recommend the inclusion of this program component in any replications of the model. In addition, we recommend that any replication should explore ways in which the responsibilities of the Community Navigators could be enhanced to incorporate additional roles and responsibilities beyond those attached to the paralegal position. These could include responsibilities often associated with

the Community Navigator position at-large and found in other programs administered by MOIA and the City of New York, such as acting as linguistic and cultural liaisons between the program and the communities being served.

Greater Attention Should Be Given to Identifying Service Locations That Are Located Within Underserved Communities. There were two notable gaps. First, there were only a limited number of library branches involved in NYCitizenship that were near or within East Asian communities, which were separately identified as being underserved by the program. Second, although services were offered on Staten Island, a borough of NYC with relatively limited transportation links, for the first two years of the program, they were discontinued thereafter. In addition, stakeholders from DSS/HRA indicated the importance of locating services at more than one DSS/HRA office, especially because one of the key populations served through DSS/HRA are those with impaired mobility; importantly, home visits were available for those who needed it. A similar program should be designed and implemented to be mindful of the needs and locations of populations served (e.g., cultural community centers may be used instead of libraries).

More Capacity Should Be Developed for Applicants Who Speak Languages Other Than English and Spanish, As Well As Those Who May Have Certain Disabilities. Stakeholders described the program as equipped to serve clients who speak English and Spanish, but there was limited capacity to serve clients who speak other languages. In particular, Cantonese and Mandarin outreach materials were limited, as were legal service staff fluent in these languages. In addition, while direct engagement was considered an optimal strategy, outreach staff were limited in their ability to recruit using these languages. This language capacity should be increased to better serve a broader cross-section of potential clients. Furthermore, a few library clients noted limitations of services for those with disabilities (and other vulnerable populations such as seniors). Accommodations of services and facilities (especially with respect to library access to meeting rooms) should be developed. Communities desiring to establish a similar program should carefully examine the language and mobility needs of clients, and establish resources that match those needs. Although comments noted above were largely from the perspective of library clients and stakeholders, the topic of expanding program reach is applicable to both the library system and DSS/HRA.

Stakeholders Consistently Recommended That the Contract Deliverables (e.g., Number of Applications Submitted) to Which They Are Measured Be Adjusted to Account for the Complexity of Work. The contract deliverables focused on the number of citizenship applications submitted and approved. However, a large proportion of the work carried out is in preparation for, or ancillary to, the citizenship application process. These activities include required concurrent I-90/green card renewals, medical certifications for disability exceptions, fee waivers, FOIA requests, resolving tax and financial incongruities, and reviewing underlying issues in immigration and criminal history that may put the applicant at risk. The lesson learned for other communities is that not all tasks are equal in providing services, so the metrics used should be reflective of those demands.

Communication with Clients About Status and the Process Should be Improved and Streamlined. Overall, clients were satisfied with their interactions with program staff. However, the experience might be enhanced if the process were more streamlined (e.g., a clear process for submitting documentation and fewer meetings/trips). Clients were often frustrated with the "back and forth" in gathering and submitting the required documentation. For some, having to make multiple trips to submit paperwork reflected negatively on the program. For example:

- *"…maybe they can be more organized and accurate with all the documentation preparation…with New York Legal, it's kind of disorganized."*
- *"If we know that these things [documents] are needed, then we can prepare first. When we just apply, then they are like, you need this paper, you need this paper… so one by one you have to give papers and papers and papers."*

Communities implementing a similar program should streamline a communication process, proactively identify bottlenecks, and be responsive to the feedback of clients.

Change Which Agency/Organization is Responsible for the Scheduling and Pre-Intake Eligibility in the Library Component. The assignment of responsibility for the scheduling to third-party organizations (in the library component of the program) resulted in an increase of inappropriately screened or unprepared individuals arriving for their first appointment. Stakeholders contrasted clients who were scheduled through the libraries and arrived prepared, with those who were scheduled through other organizations (e.g., 311 or the hotline) who often arrived without the necessary materials or with an inaccurate understanding of the program. A general consensus among stakeholders was the need to rethink this process. It may be more effective to assign scheduling

responsibilities to either the partner(s) responsible for recruitment and outreach or the partner(s) responsible for providing legal services, as compared to involving a third party in the process.

Focus on Direct Contact for Outreach and Assess Why Other Efforts Have Not Resulted in Wider Awareness of the NYCitizenship Program. Many of the suggestions that program clients gave to increase awareness (e.g., print and radio advertisements, making information available in oft-frequented spaces, etc.) seem to be happening to some extent. Therefore, it may be useful to assess *why* these efforts have not resulted in broader awareness (e.g., is it the placement of ads, the frequency of outreach/engagement, the messaging, etc.?). Based on conversations with program clients and stakeholders, it appears the most effective outreach and engagement strategy has been direct communication including word-of-mouth referrals, direct contact with staff, and letters in the mail. It might benefit similar programs to place greater emphasis on these types of outreach and engagement strategies, making them the primary means of communication.

Potential for Replication

The findings presented above can be used to guide a replication of the model in other communities that are contemplating implementing a similar program. There are several caveats:

- There is a strong potential for replication given that many of the partners and resources noted here may also be available to varying degrees in other communities.
- Municipalities considering replication should focus on the core components of:
  - Strong legal services (finding a good legal service provider) and administrative/paralegal assistants (referred to as Community Navigators in the current implementation) who ideally would be hired from within the communities served with relevant linguistic proficiency and who are well supported with proper space, technology, and other resources.
  - Credible institutions as partners, with the understanding that these institutions do not have to be libraries or social service agencies similar to DSS/HRA (who were both the right choices for NYC). These partners can be other trusted agencies or organizations that fit the terrain of a particular community, as long as they have an established and trust-based relationship with local immigrant communities.
  - Strong partnerships with close communication, responsibility sharing, and clear lines of demarcation (and complementary skills as well as needs).

- Legal assistance in support of naturalization is a complex task that requires ample administrative time and support. This could be done with paralegal support and/or an enhanced position that includes community connections and linguistic support (a Community Navigator model).

- Service targets and metrics calibrated to the complex nature of services provided.

The successes and challenges presented here are specific to this evaluation's particular time period and political context. As Federal, state, and local policies continue to change, the structure and details of the program may change as well. In addition, the needs of a particular immigrant community and municipality may change. Contextual factors include, for example, upcoming (potential) changes to fee waivers and cost of applications, changes to perception and policy around the public charge rule,[22] and the intersection of naturalization policy and receipt of public benefits.

[22] For purposes of determining inadmissibility, "public charge" means an individual whom USCIS deems likely to become primarily dependent on the government for subsistence, as demonstrated by either the receipt of public cash assistance for income maintenance or institutionalization for long-term care at government expense. See https://www.uscis.gov/green-card/green-card-processes-and-procedures/public-charge for more information.

Appendix A

Program Partners

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Program Partners

Mayor's Office for Immigrant Affairs

The NYC Mayor's Office of Immigrant Affairs (MOIA) promotes the well-being of NYC's immigrant communities by advocating for policies that increase justice, equity, and empowerment. MOIA leads, supports, and manages programs that help to successfully include immigrant New Yorkers into the civic, economic, and cultural life of the City. For more information on all MOIA services and the City's many resources for immigrant New Yorkers, go to nyc.gov/immigrants; call the MOIA hotline at 212-788-7654 from 9am to 5pm, Monday to Friday or send an email to AskMOIA@cityhall.nyc.gov; and follow us on Twitter, Instagram, and Facebook. (Source: https://www1.nyc.gov/site/immigrants/index.page)

Responsibilities:

- Program oversight and facilitation including contract and fiscal management
- Citywide outreach and engagement
- Grant writing and administration with public and private funders

New York Legal Assistance Group

Since 1990, the New York Legal Assistance Group (NYLAG) has used the power of the law to help New Yorkers in need combat social and economic injustice by working to address emerging and urgent needs with comprehensive, free civil legal services, direct representation, impact litigation, policy advocacy, financial counseling, medical-legal partnerships, and community education and partnerships.
(Source: https://www.nylag.org)

Responsibilities:

- Provision of legal and financial counseling services

Human Resources Administration

The Human Resources Administration (HRA), an agency with New York City's Department of Social Services (DSS), is the nation's largest social services agency and assists over 3 million low-income and vulnerable New Yorkers annually through the effective and efficient administration of more than 12 major public benefits programs, which reflects the priority of addressing poverty and income inequality.
(Source: https://www1.nyc.gov/site/hra)

Responsibilities:

- Outreach and recruitment of clients
- Hosting of legal services at DSS/HRA
- Supporting grant writing and administration

Brooklyn Public Library

Brooklyn Public Library (BPL) is among the borough's most democratic civic institutions, serving patrons in every neighborhood and from every walk of life. Established in 1896, BPL is one of the nation's largest public library systems and currently has nearly 700,000 active cardholders. With a branch library within a half-mile of the majority of Brooklyn's 2.6 million residents, BPL is a recognized leader in cultural offerings, literacy, out-of-school-time services, workforce development programs, and digital literacy.
(Source: https://www.bklynlibrary.org)

Responsibilities:

- Outreach and recruitment of clients
- Hosting of legal services at branch libraries

Queens Public Library

Founded in 1896, Queens Public Library offers free access to a collection of more than 5 million books and other materials in multiple languages, technology and digital resources, and more than 80,000 educational, cultural, and civic programs a year. It consists of 65 locations, including branch libraries, a Central Library, seven adult learning centers, a technology center, two universal pre-kindergartens, and two teen centers. (Source: https://www.queenslibrary.org)

Responsibilities:

- Outreach and recruitment of clients
- Hosting of legal services at branch libraries

New York Public Library

Founded in 1895, New York Public Library (NYPL) is the nation's largest public library system, featuring a unique combination of 88 neighborhood branches and four scholarly research centers, bringing together an extraordinary richness of resources and opportunities available to all. NYPL serves more than 17 million patrons a year. (Source: https://www.nypl.org)

Responsibilities:

- Outreach and recruitment of clients
- Hosting of legal services at branch libraries

Supporting Funders

The NYCitizenship program was supported by:

- The New York City Mayor's Office for Economic Opportunity[23]
- The Mayor's Fund to Advance New York City
- Citi Community Development
- The Carnegie Corporation of New York
- The Charles H. Revson Foundation
- Robin Hood Foundation

[23] The Mayor's Office for Economic Opportunity is dedicated to using "evidence and innovation to reduce poverty and increase equity. It advances research, data and design in the City's program and policy development, service delivery, and budget decisions" and is the funder of this evaluation study.

Appendix B

Methodology and Process

Appendix B
Methodology and Process

Our overall evaluation proceeded through several steps: (1) considered prior data and stakeholder input; (2) refined evaluation questions and conceptual framework that guided efforts; (3) developed an approach that provided feedback and insights about ongoing and past program performance; (4) worked with oversight groups (e.g., institutional review board [IRB], New York City authorities) to receive approvals; (5) gathered data through a mix of qualitative and quantitative sources; (6) conducted analyses to assess a program's processes and outcomes; and (7) communicated results to stakeholders.

This evaluation used a robust mixed-methods approach to take advantage of available data sources while providing a fine-grained descriptive report and recommendations. These sources included reviews of available documentation, interviews of program staff and stakeholders, interviews of clients, and descriptive analysis of the data. The Westat-Metis team viewed the program as a cohesive program, with a focus on the Community Navigator model and the program's engagement of New York City's immigrant communities through the combination of agency (libraries and the City of New York Human Resources Administration [DSS/HRA]) and organizational partners. In addition, we viewed the program as having two delivery strategies that may differ. Furthermore, we viewed the program through an equity lens that acknowledges the potential for substantive differences in outreach, engagement, and program effectiveness by where clients live (e.g., accessibility differences by borough); membership in immigrant communities (e.g., level of pre-existing uptake in municipal programs); and preferred language.

The Westat-Metis team used a triangulation approach to synthesize all data derived from the qualitative analyses. Areas of overlap from individual and group interviews, and document review were analyzed to determine how the perspectives of all stakeholders converge and diverge. Triangulation of methods were also used to examine evaluation questions and increase the rigor of the study design.

The primary goals of the current evaluation were:

- To assess the Community Navigator model launched in July 2017.

- To assess outreach strategies being implemented across the libraries and DSS/HRA sites.

These objectives were used as a basis to develop specific research questions that would guide data collection and analyses. These research questions were entered into a domain matrix that also listed potential data sources to identify any gaps as well as orient data collection activities. Table B-1 provides the two main objectives, research questions, and potential data sources in a matrix.

Table B-1. Matrix of Evaluation Research Questions and Sources of Data

Objective: To understand implementation of the Community Navigator model to identify best practices and lessons learned, as well as any structural barriers that may have led to slower implementation (Research questions 1-4) *Objective:* To assess the program's best practices for outreach to and engagement with eligible legal permanent residents through libraries and HRA (Research questions 5-9)	Data source					
	Agency/org reps	Attorneys	Comm. navigators	Library/DSS/HRA staff	Participating clients	Program data
1. In what ways has the Community Navigator model helped to enhance program efficiency (compared to other delivery methods and to before there was a navigator model)? For example, how streamlined is the process from the point of initial screening to finalizing the citizenship application?	✓	✓	✓			✓
2. What is the current maximum "capacity" of the program and how could that capacity be reached or improved?	✓	✓	✓			✓
3. What roadblocks exist to efficient implementation, especially with regard to the distinct roles and responsibilities of the attorneys and navigators?	✓	✓	✓			
4. What best practices are emerging for efficiently coordinating the work of navigators and attorneys? What were the expectations for the Community Navigator model at the outset and have they been met?	✓	✓	✓			
5. How has location affected engagement success across the library sites and as compared to the DSS/HRA site?	✓			✓	✓	✓
6. What messaging strategies are the most effective and does this vary for different subpopulations?		✓	✓	✓	✓	
7. What can be learned from DSS/HRA's engagement practices to improve effectiveness of the libraries' outreach, and vice versa?	✓	✓	✓	✓		
8. How can the program reach lawful permanent residents who are currently not accessing services? How can the program reach lawful permanent residents within the program area who are unaware of services or who are not accessing services? In addition, how can the program reach lawful permanent residents who are outside of the immediate area surrounding each location but who may be part of the population who would benefit from services?	✓	✓	✓	✓	✓	✓

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	Agency/org reps	Attorneys	Comm. navigators	Library/DSS/HRA staff	Participating clients	Program data
9. What has been the client experience with NYCitizenship outreach and engagement: What are the barriers they face when learning about or accessing the services? Would they have naturalized without this program in place? What barriers did they face to becoming citizens and how could they be addressed? How important was the Community Navigator to their participation in the program?		✓	✓	✓	✓	

Staff Interviews

The Westat-Metis team conducted interviews with 41 program stakeholders between August 2019 and November 2019. Interviewee selection was guided by the research questions, with interviewees representing each of the program partners as well as each stage of the project (e.g., leadership and planning, outreach and engagement, legal service provision). Furthermore, stakeholder interviews were designed to complement the client interviews and administrative data request occurring simultaneously. Interviews took place over the phone or in-person. Stakeholders were fully consented prior to the interview taking place and interviews were recorded and transcribed for analysis purposes. Interviews took between 45 minutes and 1.5 hours depending on the stakeholder type and format (individual or group interview) and followed detailed, stakeholder-specific, protocols. Table B-2 presents the stakeholders interviewed by agency/organization and position.

Table B-2. Stakeholder Data Sources/Respondent Groups

New York Legal Assistance Group

- Grants Supervisor, Immigrant Protection Unit (Program lead)*
- Community Navigators (8, 2 per legal team)*
- Lead Attorneys (4, 1 per legal team)*
  Supervising Attorneys (2) *

Public Libraries

- Assistant Director of Programming and Operations, New Americans Program, Queens Public Library (QPL)*

- Coordinator of Immigrant Services, Outreach Department, Brooklyn Public Library (BPL)
- Manager, Outreach Services, Outreach Services and Adult Programming, New York Public Library (NYPL)
- Branch Managers (12)*
- NYPL Outreach Assistants (2)*
- QPL Outreach Assistants (1)*
- BPL Outreach Assistants (1)*

Human Resources Administration

- NYCitizenship Program Manager
- Deputy Commissioner of the Office of Advocacy and Outreach
- Current Outreach Assistants (2)
- Prior Outreach Assistants (2)

Mayor's Office of Immigrant Affairs

- NYCitizenship Program Manager

***Interview(s) conducted in-person. Two branch manager interviews were conducted in-person.**

Once all interviews were completed, transcriptions were reviewed and analyzed by research question and emergent themes. Findings were developed within and between stakeholder groups to facilitate identifying both stakeholder-specific and cross-program findings.

Site Visits

The Westat-Metis team conducted three site visits at representative NYCitizenship locations in Manhattan, the Bronx, and Queens (one for each library system).[24] During each visit, a representative from the Westat-Metis team interviewed the library branch manager and viewed the location made available for legal services. Visits were made on days where services were not being provided, due to the private nature of the service provision which would preclude active observation. Locations ranged from the major library hub (Flushing, Queens) to two neighborhood branches (Manhattan and Brooklyn), one of which was also the site of multiple co-located library services and programs.

[24] A mutual decision was made to forgo the visit to the HRA site.

Document Review

The Westat-Metis team requested and reviewed background documentation at the inception of the evaluation to inform the development of the evaluation plan, interview protocols, and administrative data request. Documentation requested and received included client service-flows, sample outreach and recruitment materials, intake screening materials, and staff guides.

Client Interviews

The Westat-Metis team conducted phone interviews with 36 program clients – 21 from library sites and 15 from the DSS/HRA site. The Westat-Metis team, New York Legal Assistance Group (NYLAG) and the Mayor's Office of Immigrant Affairs (MOIA) worked collaboratively to identify and recruit clients to interview, taking into consideration multiple factors such as language and location. The team worked with NYLAG to purposefully select clients who represented multiple immigrant communities; languages (English, Spanish, Mandarin, and Cantonese); and age groups. In addition, the Westat-Metis team worked with NYLAG to select clients who represented the three phases of the citizenship process:

- **Phase 1:** Individual has completed the application for submission to the U.S. Citizenship and Immigration Services (pending application);
- **Phase 2:** Individual has attended the biometrics appointment and is awaiting an interview; and
- **Phase 3:** Individual has completed the citizenship process and is naturalized.

With input from NYLAG, DSS/HRA, and MOIA on the goals and objectives of the client interviews, the Westat-Metis team developed an interview protocol, which sought to capture clients' experiences with the NYCitizenship program, with a particular focus on outreach/engagement and the Community Navigator component. The line of questioning also captured clients' views on the barriers to gaining citizenship and reasons to pursue citizenship, as well as recommendations for improvement. Interviews took about 30 minutes and were conducted by phone primarily in English

(17 total) and Spanish (13 total), with a few additional interviews in Mandarin (1 total) and Cantonese (3 total).[25] Once completed, each interview client received a $25 gift card via mail.

Once all interviews were completed, the interview notes and transcripts were reviewed, organized (under the broad protocol categories listed above) and coded for thematic analysis, which allowed for identifying common themes that emerged across the interviews.[26] See Table B-3 below for the frequencies of interviews by language and origination.

Table B-3. Data Sources/Respondent Groups: Library Systems

Program clients via the library systems (21)	Program clients via the human resources administration (13)
English (11) • Phase 1 (4 Clients) • Phase 2 (4 Clients) • Phase 3 (3 Clients)	English (6) • Phase 1 (2 Clients) • Phase 2 (2 Client) • Phase 3 (2 Clients)
Spanish (9) • Phase 1 (3 Clients) • Phase 2 (3 Clients) • Phase 3 (3 Clients)	Spanish (4) • Phase 1 (2 Clients) • Phase 2 (1 Client) • Phase 3 (1 Client)
Mandarin/Cantonese (1) • Phase 3 (1 Client)	Mandarin/Cantonese (3) • Phase 1 (1 Client) • Phase 2 (1 Client) • Phase 3 (1 Client)

[25] The intention was to conduct 6 interviews in Chinese (split evenly between Mandarin and Cantonese); however, 2 of the 6 interviews scheduled to be conducted in Chinese were completed in English, at the respondents' request.

[26] Qualitative analysis was conducted on 34 of the 36 interviews. Two interviews were removed from analysis because the responses did not seem to relate to participation in the NYCitizenship program and/or were not coherent.

Administrative Data

The library systems and the DSS/HRA site each provided administrative data in aggregate form for the years 2017, 2018, and 2019 using an Excel template with variables under the broad categories of service, legal team aggregate data, client background, scheduling, and outreach and engagement. Some data were either not applicable or not available to one or both types of sites, and a crosswalk was created to identify common variables between the two sets of data that could be used to make comparisons. NYLAG only had client background data available for the DSS/HRA site for 2019, but DSS/HRA was able to obtain background data for individuals with scheduled NYLAG appointments (i.e., a larger group that includes all NYLAG clients from the DSS/HRA site, as well as referred individuals who, for example, were deemed program-ineligible) for all 3 years (2017-2019). The data from the Excel files were restructured to create separate variables by site and year. The data were then imported into a combined SPSS file to run frequencies and calculate percentages where appropriate. The client background variables such as country of origin, preferred language, and borough were divided by the corresponding number of clients to determine the percentage of clients with that characteristic by site and year. Likewise, the additional data DSS/HRA provided was divided by the number of clients with scheduled NYLAG appointments for each year. As the percentages of individual Chinese dialects (e.g., Mandarin, Cantonese) were very low, these were combined to make one Chinese language variable. The data were analyzed to describe patterns and differences between the sites over years. Findings were then exported into Excel to create graphs and tables.