



NATURALIZATION WORKING GROUP

March 4, 2024

The Honorable Alejandro Mayorkas
Secretary of Homeland Security
Washington, DC 20528

RECEIVED

By ESEC at 9:00 am, Mar 05, 2024

Dear Secretary Mayorkas:

The 61 undersigned organizations and individuals, many of whom are members of the Naturalization Working Group (NWG), write to urge you to approve the timely publication of the regulation titled "Citizenship and Naturalization and Naturalization and Other Related Flexibilities" (RIN 1615-AC80). It is our hope that this regulation contains provisions that would eliminate administrative hurdles to citizenship and clarify adoptees' and waiver recipients' eligibility to naturalize.

The NWG is coordinated by the NALEO Educational Fund and made up of national and local organizations committed to helping lawful permanent residents (LPRs) become U.S. citizens. The NWG strives to improve federal policies and practices related to naturalization and to educate legislators and other policymakers about the need to eliminate barriers to naturalization. Our coalition's expertise derives from its multiple member organizations that have significant experience in promoting naturalization and in assisting newcomers with the U.S. citizenship process, including immigrants who are serving in our military. The NWG is the policy complement to the New Americans Campaign (NAC), a diverse nonpartisan national network of respected immigrant-serving organizations, legal services providers, faith-based organizations, immigrant rights groups, foundations, and community leaders. The NAC transforms the way aspiring citizens navigate the path to becoming new Americans.

In our collective decades of practice assisting with naturalization, we have often seen regulatory changes have significant effect on LPRs' interest in and ability to pursue U.S. citizenship, naturalization rates, and the benefits that new Americans and the nation as a whole enjoy through naturalization. In instances ranging from increases in the cost to file a Form N-400 to the creation of rules governing requests for disability-based exemptions from English and civics testing, adoption of regulations has been associated with significant shifts in the number of applicants for U.S. citizenship and other outcomes. For example, the number of applications fell from almost 1.4 million in 2007 to just more than 500,000 in 2008 after a fee hike took effect. While factors other than the fee hike affected the difference in the number of applicants within these two years, we know that many of the LPRs served by our organizations filed in 2007 in anticipation of the fee increase. The recently-published "Barriers to Naturalization" literature review from the Library of Congress in partnership with USCIS affirms our assessment of the effects of fee regulations.

In routine regulatory disclosures and language in the USCIS Fee Rule published on January 31, 2024, we have seen that the agency is preparing to issue a proposal to update regulations affecting naturalization. Our appreciation for the positive difference that potential regulatory updates could make compels us to ask you to act expeditiously in support of USCIS' rulemaking and its implementation of Executive Order 14012, Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans. Our organizations and the thousands of LPRs we serve each year can do the most good in their communities if proposed rules that facilitate naturalization are published in the very near term.

We urge you to rapidly approve publication of proposed regulations that increase access to U.S. citizenship by addressing the following, among other topics:

- Reducing administrative burden on LPRs whose green cards may expire while their naturalization applications are pending by codifying automatic extension;
- Streamlining and allowing for greater flexibility in the timing and other aspects of the submission of requests for disability-based test exemptions;
- Recognizing adoptees' U.S. citizenship; and
- Clarifying eligibility for citizenship of people granted inadmissibility waivers.

We appreciate the significant progress that USCIS has made under your leadership to implement policies consistent with Executive Order 14012, which have reduced several barriers to naturalization. To sustain this momentum it is important for the agency to take expeditious action to publish proposed naturalization regulations. This will help ensure that legal representatives, community leaders, and LPRs and their families can take confident action knowing the current Administration's policy changes, adopted in commitment to enhancing the accessibility of U.S. citizenship and immigrant integration, have the force of law. We count on your leadership in this critical moment to move forward.

Thank you for your consideration and consistent recognition of the benefits that naturalization confers on our nation.

Sincerely,

National

American Federation of Teachers
American Immigration Council
American Immigration Lawyers Association
Asian Americans Advancing Justice | AAJC
CASA, Inc.
Catholic Legal Immigration Network, Inc. (CLINIC)
Center for Popular Democracy
ECHO for citizenships Educators
Hispanic Federation
Immigrant Legal Resource Center
Immigration Hub
Labor Council for Latin American Advancement
Language & Communication Workshop

NALEO Educational Fund
National Immigration Forum
National Korean American Service & Education Consortium (NAKASEC)
National Partnership for New Americans
Oasis Legal Services
Poder Latinx
Pro Bono Net
UnidosUS
Welcoming America

State/Local

Asian Counseling and Referral Service
BONDING AGAINST ADVERSITY
Boulder Valley Unitarian Universalist Fellowship
CARECEN
Chinese Information and Service Center
Dominicanos USA
Emerald Isle Immigration Center
Estrella del Paso (Formerly DMRS)
GMHC, Inc.
HIAS Pennsylvania
Illinois Coalition for Immigrant and Refugee Rights
Just Neighbors
Korean Community Service Center
Make the Road New York
Massachusetts Immigrant and Refugee Advocacy Coalition
New Mexico Immigrant Law Center
OCA-Greater Houston
OneAmerica
Project Citizenship
Proyecto Vida Digna
San Diego Community College District
Self-Help for the Elderly
Unitarian Universalist Refugee & Immigrant Services & Education
Wind of the Spirit Immigrant Resource Center

Individuals (affiliations provided for identification purposes only)

Allison U Caulfield
Carol Burrill, Monrovia Community Adult School
Carol L. Wolchok, Lawyer, Citizenship program manager, Citizenship teacher
Elizabeth Breedlove
Ellen Biderman, Santa Fe Literacy Volunteers
Emilia Rivera
Gretchen Costello
Judy Yublosky, HIAS Chicago
Lynn Heller, East African Community Services
Mariana Sanchez, BAA
Marta Zimmerman, Literacy Pittsburgh

Maura Lewiecki, Naturalization Network
Nicole Mannino Johnson, Literacy Pittsburgh
Sandra Antidormi
Stephen D. Younger
Susan Dowd, Lawrence Adult Learning Center
Susan Jo Keller, Santa Fe Literacy Volunteers



U.S. Citizenship
and Immigration
Services

May 28, 2024

American Federation of Teachers
555 New Jersey Avenue NW
Washington, DC 20001

Dear American Federation of Teachers:

Thank you for your March 4, 2024 letter to the Department of Homeland Security (DHS) regarding citizenship and naturalization efforts. I am responding on behalf of the Department.

The Department appreciates your interest in the planned regulation titled “Citizenship and Naturalization and Other Related Flexibilities” (RIN 1615-AC80).¹ We invite you to participate in the rulemaking process by providing your feedback after U.S. Citizenship and Immigration Services (USCIS) publishes the proposed rule.

Under Executive Order 14012, *Restoring Faith in Our Legal Immigration System and Strengthening Integration and Inclusion Efforts for New Americans*, the President tasked the Department with establishing and chairing the Interagency Naturalization Working Group (NWG). USCIS assumed leadership of the NWG in early 2021 and works across federal agencies and with state and local governments to develop and implement a national strategy for promoting naturalization. USCIS remains committed to working with our federal, state, and local partners to empower eligible immigrants to pursue citizenship and the rights and opportunities available to them.²

Along with interagency efforts, USCIS has released a number of resources and tools for naturalization outreach work, including new funding opportunities under the Citizenship and Integration Grant Program³ and the Eligible to Naturalize Dashboard.⁴ The Citizenship and Integration Training Academy, or CITA, is a new funding opportunity with a goal to train a new cadre of citizenship instructors and oversee the development of new citizenship programs.⁵ It is available to organizations who have not previously received USCIS funding. We are also grateful

¹ See <https://www.regulations.gov/document/RISC-2024-0001-0001>.

² See <https://www.uscis.gov/promotingnaturalization>.

³ See <https://www.uscis.gov/citizenship-resource-center/civic-integration/learn-about-the-citizenship-and-integration-grant-program/fiscal-year-2024-citizenship-and-integration-grant-program>

⁴ See <https://www.uscis.gov/tools/reports-and-studies/immigration-and-citizenship-data/eligible-to-naturalize-dashboard>.

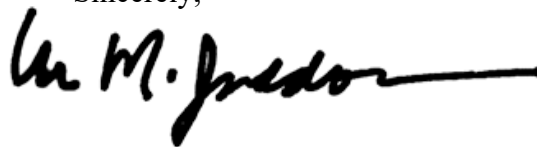
⁵ See <https://www.uscis.gov/newsroom/news-releases/uscis-announces-new-fy-2024-funding-opportunity-under-the-citizenship-and-integration-grant-program>.

for our partnerships with private and nonprofit sector institutions such as yours, and we are especially interested in hearing about ways we can continue to develop the right tools to best support immigrant integration and inclusion efforts by the private and nonprofit sectors.

In addition to our naturalization promotion work, USCIS has taken several steps to reduce barriers to naturalization. These includes changes to the Form N-400, Application for Naturalization, and policy updates for military service members and adopted children. USCIS has also released new guidance on naturalization ceremony venues and access to voter registration services.⁶ This progress will continue as we strive to further promote naturalization as an important part of restoring faith in our legal immigration system and strengthening integration and inclusion efforts.

Thank you again for your letter and interest in this important issue. Please share this response with the other organizations in the Naturalization Working Group that cosigned your letter. Should you wish to discuss this matter further, please do not hesitate to contact the USCIS Office of Public Engagement at public.engagement@uscis.dhs.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ur M. Jaddou", followed by a horizontal line extending to the right.

Ur M. Jaddou
Director

⁶ For more information on policy updates, see <https://www.uscis.gov/policy-manual/updates>.