



February 9, 2015

Ms. Cecilia Muñoz  
Assistant Secretary to the President and  
Director of the Domestic Policy Council  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

The Honorable Leon Rodriguez  
Director  
U.S. Citizenship and Immigration Services  
U.S. Department of Homeland Security  
20 Massachusetts Avenue NW, Suite 5110  
Washington, DC 20529

Dear Director Muñoz and Director Rodriguez:

On behalf of the Naturalization Working Group, we would like to present policy recommendations, which we believe should be priorities for the Administration to take in the next year to promote immigrant integration.

The undersigned organizations very much appreciate the opportunity to share our perspectives with the White House Task Force on New Americans. Because our organizations have significant expertise in promoting naturalization and assisting newcomers with the U.S. citizenship process, this letter will first set forth specific recommendations on how U.S. Citizenship and Immigration Services (USCIS) can make the naturalization process affordable and accessible for the nearly 8.8 million legal permanent residents (LPRs) who are eligible for U.S. citizenship.

We will then provide policy recommendations on other actions the Task Force and federal agencies should take.

**I. Recommendations to Make Naturalization More Accessible and Affordable**

Below are the actions we urge USCIS, in collaboration with other federal agencies, to take to educate LPRs about the opportunities of U.S. citizenship and to make the naturalization process more accessible.

**Launch a naturalization promotion effort among federal agencies, and expand proposed public education campaign:** The USCIS should integrate U.S. citizenship

promotion into the programmatic efforts across all federal agencies. Additionally, USCIS was directed to launch a comprehensive naturalization awareness public media campaign targeting the ten states that are home to 75% of the overall LPR population as part of the President's executive action in November 2014. We urge the USCIS to work closely with stakeholders who are knowledgeable about reaching and educating LPRs in implementing this effort. The agency should also expand this campaign to other states across the country.

**Inform LPRs of their eligibility for naturalization:** The USCIS should mail reminders to all LPRs when they are first eligible for naturalization in advance of their three-year or five-year eligibility dates. USCIS should work with other federal agencies, such as Customs Border Protection, to provide naturalization information to LPRs they encounter or serve.

**Provide more accessibility to LPRs immigrants who live far from field offices:** USCIS should utilize mobile units and temporary office space in other government buildings to bring services, including application support services and naturalization interviews, to communities with significant numbers of immigrants that live far away from USCIS field offices.

**Stabilize and lower the cost of naturalization by revisiting the immigration fee structure and expanding the availability of options to make naturalization more affordable:** The USCIS should actively examine several options to make naturalization more affordable. First, it should evaluate the feasibility of reducing the naturalization fee for all applicants. It should also implement additional fee options and waivers, such as a family cap for parents and children applying together for naturalization, and partial fee waivers for aspiring Americans who have relatively low incomes but do not qualify for a full fee waiver.

**Pursue resources to make the naturalization fee more affordable:** In the course of conducting regular fee reviews, USCIS should distinguish between the direct costs of processing applications and overhead costs, including the amount of surcharge placed on applications to cover the cost of processing fee-free applications, such as those for refugees. The President's FY2017 budget should seek Congressional appropriations to cover some, if not all of these overhead costs, so that surcharges can be removed from the cost of applying for naturalization and other immigration services.

**Standardize the fee waiver process:** The USCIS should expand oversight of its fee waiver application process to ensure that eligible low-income applicants are not denied. The USCIS should develop more uniform practices for its offices across the nation for the process of approving or denying fee waivers, and ensuring that applicants' requests for a fee waiver do not affect the adjudication of their applications. The USCIS should also provide more specificity in its fee waiver denial notices to help applicants understand what additional information is needed to accurately complete the application process.

**Improve compliance with "due consideration" requirement:** The USCIS should ensure better compliance by adjudicators with the federal regulations governing the naturalization government and history examination (8 CFR §312.2(c) (2)), which require that due consideration be given during the administration of the exam to applicants' age, education, length of residence in the United States, opportunities available and efforts made to acquire the requisite knowledge, and any other relevant factors. The USCIS should enhance the oversight and training of adjudicators to help achieve this goal.

**Make naturalization materials and resources available in a multiple languages:**

The USCIS should translate the Form N-400 application into at least, the same number of major languages into which the decennial Census form is translated. The WelcomeUSA.gov, USCIS's website, should be re-launched with updated content in multiple languages, making a more user-friendly website for new immigrants.

**Enhance the availability of the N-648 medical waiver:** The USCIS should expand the definition of medical professionals allowed to complete an N-648 to include nurse practitioners. USCIS should make a small change to the regulations (8 CFR § 312.2 (b) (2)) to allow licensed nurse practitioners to complete Form N-648 when applying for a disability-based waiver of the naturalization testing requirements. Many low-income immigrants receive their primary care from a nurse practitioner since nurse practitioners are often more accessible than medical doctors, especially in low income communities. Also, due to the acute shortage of primary care doctors, a large and increasing number of states are allowing licensed nurse practitioners to work independently from medical doctors.

**Enhance the experience at oath ceremonies:** The USCIS should provide oath ceremony participants and audience with a list of trusted naturalization assistance service providers in their community so they may seek naturalization services for themselves and/or encourage their family members and friends to naturalize. The USCIS field offices should also have a set of official guidelines and protocol to follow for formal naturalization ceremonies. These ceremonies should be similar to those held at courts to improve the dignity and solemnity of naturalization oath ceremonies held at the field offices.

**Promote best practices for providing voter registration services after swearing-in ceremonies:** The USCIS should assess the practices of all district offices that collaborate with election officials and groups to assist newly-naturalized citizens with voter registration following swearing-in ceremonies. The agency should identify offices with the best models for registering citizens and replicate those models in all offices where possible.

**Ensure there is a federal source of funds for citizenship preparation:** The Office of Citizenship should continue to fund naturalization assistance and prioritize its naturalization capacity-building grants to organizations and state and local governments that develop programs in underserved areas. Funding activities that address English language and civics knowledge barriers to naturalization is also key to these efforts. Since its inception in 2009, the Office of Citizenship's Citizenship and Integration Grants program has contributed to an increase in the naturalization rates of LPRs. Despite the very modest size of the initiative, we estimate that the grants awarded to-date will assist nearly 100,000 LPRs with the naturalization process, at a cost of less than \$350 per beneficiary. Funding for this efficient and effective program has depended upon year-to-year discretionary appropriations by Congress, and has appeared increasingly imperiled as pressures on the federal budget have increased. We urge USCIS not to fund the citizenship and integration grants program from immigration service application fees and the President to continue to request discretionary appropriations for the program.

**Empower the Office of Citizenship to obtain private financial support for citizenship preparation work:** The USCIS should examine the feasibility of soliciting donations from the private sector to address the instability and potential elimination of public funding for the Citizenship and Integration Grants program. We propose that the Secretary or Deputy Secretary of the Department of Homeland Security allow the Office of Citizenship to

solicit, accept, hold, administer, and utilize gifts and bequests, including property, for the limited purpose of supporting the Citizenship and Integration Grants Program and initiatives to promote naturalization.

## **II. Recommendations for Other Federal Agencies:**

### **The White House:**

- Use the influence of the White House to encourage states and localities to establish a coordinator and/or municipal offices of immigrant affairs that will allow states and local communities to better liaise and coordinate with the federal government regarding immigrant integration policies and programs.
- We believe the creation of the taskforce is a very positive step towards promoting immigrant integration in our nation. In order to ensure that the taskforce recommendations are implemented fully, we urge the President to establish a White House Office on New Americans. This office should conduct on-going efforts to ensure coordination of federal agency policies on immigrant integration and to identify and promote best state and local integration practices.
- Create a federal definition of integration and promote it nation-wide. A federal definition of integration would allow the language surrounding this topic to become standardized.
- Create a federal standard of immigrant integration performance measures and outcomes that can guide programming and decision-making by cities, states, and other entities working towards this goal.

### **Department of Labor:**

- The White House should ask Congress to fund a new federal grant program to provide monetary and technical support to efforts that assist immigrants and refugees with credentials and degrees in their home countries to transfer their skills to credentials and degrees in the United States.
- Increase education and training regarding workers' rights, wage and hour laws, and work force readiness.
- Increase enforcement of health, safety and wage and hour laws.
- Expand workforce development programs focused on helping refugees and immigrants.

### **Department of Education:**

- The president's FY2017 budget request should increase funding for programs related to English language learners in early learning programs and in elementary and secondary education.
- Provide monetary and coordination support to state, local, and private sector initiatives to modernize delivery of English for Speakers of Other Languages (ESOL) services, and adult basic education programs, for recent immigrant and refugee arrivals.
- Support research by creating an awards program that recognizes effective studies on challenges to traditional adult education models and on innovative systems for serving low-skilled and low-literate immigrant workers.

**Department of Commerce:**

- Provide monetary and technical assistance to immigrant and refugee entrepreneurs and small businesses at the local, state, and national level.

**Small Business Administration:**

- Create a public/private partnership with financial institutions to strengthen opportunities for immigrant business owners to start and expand their business, including culturally competent business development training and services to small business immigrant owners.
- Expand programs, services, and funding opportunities to LPR small business owners.
- Expand and strengthen current SBA business incubators through partnerships with local ethnic chambers of commerce and other ethnic and immigrant business organizations across the country.

**Department of Justice:**

- The president's FY2017 budget should increase funding for expanding COPS grants to address issues related to community policing and immigrants.

**Department of Homeland Security:**

- Overhaul the DHS complaint process to make it easier for the public to access. Furthermore, it should be more user-friendly and ensure that all filed complaints for any issue in the agency are in one place.

**Corporation for National and Community Service:**

- Promote the concept of "immigrant integration through volunteering" by increasing outreach to new U.S citizens and immigrants to be part of the Corporation for National and Community service's AmeriCorps and Senior Corps programs.

The Naturalization Working Group believes that the federal government has a central role in the development and implementation of a national comprehensive strategy to promote immigrant integration. The implementation of these proposed recommendations will ensure that the United States continues to be a welcoming society to all newcomers, and that newcomers will have access and opportunities to participate fully in the economic, political, and social life of their communities. It will also ensure that the federal government, working with state and local governments, will play a critical role in the development of best policies in the area of immigrant integration.

This set of policy recommendations aims to create a society, where all contributing members have a chance to reach their fullest potential. We thank you for considering these recommendations.

Sincerely,

National Immigration Forum, Co-Coordinator of the Naturalization Working Group

National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, Co-Coordinator of the Naturalization Working Group

American Federation of State, County & Municipal (Employees), AFL-CIO

Asian Americans Advancing Justice - AAJC

Asian Americans Advancing Justice, Los Angeles

Catholic Charities, Maine

Filipino American Service Group, Inc.

Hebrew Immigrant Aid Society

Hebrew Immigrant Aid Society, Pennsylvania

Hebrew Immigrant Aid Society, Chicago

Illinois Coalition for Immigrant and Refugee Rights

Immigrant Legal Resource Center

International Rescue Committee

Korean Resource Center

National Council of La Raza (NCLR)

New York Immigration Coalition

One America

TODEC Legal Center