

Delivered electronically

August 16, 2021

The Honorable Charles Schumer
Majority Leader
U.S. Senate
Hart Senate Office Building
Washington, DC 20002

Chair Dick Durbin
Senate Judiciary Committee
711 Hart Senate Building
Washington, D.C. 20510

Members of the Senate Judiciary
Committee
224 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Nancy Pelosi
U.S. House of Representatives
1236 Longworth House Office
Building
Washington, DC 20515

Chairman Jerrold Nadler
House Judiciary Committee
2132 Rayburn HOB
Washington, DC 20515

Members of the House Judiciary
Committee
2138 Rayburn House Office Building
Washington, D.C. 20515

RE: REDUCING BARRIERS TO NATURALIZATION THROUGH BUDGET RECONCILIATION

Dear Sen. Schumer, Sen. Durbin, and Members of the Senate Judiciary Committee:

The undersigned 70 state, local, and national organizations write to request that the Senate and House support naturalization through budget reconciliation.

Ensuring that naturalization is accessible and affordable to all eligible lawful permanent residents (LPRs) confers great benefits on the United States. On average, naturalized citizens earn a higher income, comprise a significant share of small-business owners, and contribute to our nation's prosperity.¹ Becoming a citizen can increase wages between 8 and 11 percent, which in the aggregate can have a huge impact on the national economy.² Naturalized citizens also make social and cultural contributions and actively participate in our democracy. However, there are 9.2 million eligible LPRs who have not yet naturalized.³

Potential citizens are an untapped resource for civic and economic development in the United States. We believe Congress should promote naturalization using the budget reconciliation mechanism by addressing the ongoing backlog of naturalization applications, codifying the existing regulatory fee waivers for all applications to U.S. Citizenship and Immigration Services (USCIS), subsidizing naturalization fees indefinitely, and ensuring the funding of the existing Citizenship and Integration Grant Program.

I. The Importance of New Citizens to the United States

Communities throughout the United States benefit when LPRs become full participants in our nation's civic life. Naturalization has long been in the national interest and its economic benefits include on average higher incomes, increased employment rates, and more likelihood of home ownership and the

¹ Manuel Pastor and Justin Scoggins, *Citizen Gain: The Economic Benefits of Naturalization for Immigrants and the Economy*, Center for the Study of Immigrant Integration (Dec. 2012), <https://dornsife.usc.edu/csii/citizen-gain/>.

² Id.

³ Bryan Baker, U.S. Department of Homeland Security, Office of Immigration Statistics, Office of Strategy, Policy, and Plans, *Population Estimates: Estimates of the Lawful Permanent Resident Population in the United States and the Subpopulation Eligible to Naturalize: 2015-2019* (May 19, 2021), <https://www.dhs.gov/immigration-statistics/population-estimates/LPR>.

subsequent strengthening of the local housing market and tax base.⁴ The evidence is clear: supporting naturalization efforts will have a positive impact on the American economy and our democracy.

II. Current Barriers to Naturalization

Unfortunately, LPRs eligible for naturalization face significant barriers to obtaining citizenship. For example, administrative backlogs, costs, and knowledge barriers prevent many from naturalizing. The national average processing delay by USCIS is just under one year (11.8 months), with some offices taking as long as 20 months to process naturalization applications.⁵ USCIS currently has a backlog of 950,514 naturalization applications.⁶ Increasing funding to reduce this backlog through the budget reconciliation process will allow USCIS to address the current backlog and adjudicate future naturalization applications in a prompt manner.

The cost to apply for naturalization is also prohibitive for many otherwise eligible LPRs.⁷ Surveys consistently show that eligible LPRs cite cost as a factor in not pursuing naturalization, and that naturalization applications are price-sensitive.⁸ One study found that offering a fee waiver increased naturalization applications by 41 percent.⁹ While a fee waiver program exists in regulation, this important program is currently vulnerable to political targeting, as we saw under the prior administration.¹⁰ Ensuring that naturalization is more affordable will allow more eligible LPRs to access citizenship.

Insufficient funding currently hobbles efforts to reach and educate eligible LPRs on the naturalization process. The Citizenship and Integration Grant Program is an existing competitive grant program run by USCIS for immigrant-serving organizations who provide naturalization assistance. This program has awarded more than \$102 million through 473 competitive grants to organizations in 39 states and the District of Columbia. The program has helped more than 279,000 LPRs prepare for U.S. citizenship.¹¹ As effective as this program has been, its limited size and scope significantly constrains its ability to reach all potential applicants. Over one-third of project proposals submitted during FY21 were not funded, in part because there was not sufficient funding appropriated for the grant program.¹² Increasing funding for this

⁴ National Partnership for New Americans. 2021. *Citizenship For A Stronger Economy: How waiving naturalization fees can accelerate America's COVID-19 recovery*, <https://partnershipfornewamericans.org/citizenship-for-a-stronger-economy-how-waiving-naturalization-fees-can-accelerate-americas-covid-19-recovery/>.

⁵ U.S. Citizenship and Immigration Services, "Historical National Median Processing Time (in Months) for All USCIS Offices for Select Forms By Fiscal Year," accessed Aug. 3, 2021, <https://egov.uscis.gov/processing-times/historic-pt>; U.S. Citizenship and Immigration Services, "Check Case Processing Times," accessed Aug. 3, 2021, <https://egov.uscis.gov/processing-times/>.

⁶ U.S. Department of Homeland Security ("DHS"), U.S. Citizenship and Immigration Services ("USCIS"), *Form N-400, Application for Naturalization, by Category of Naturalization, Case Status, and USCIS Field Office Location (Fiscal Year 2021, 2nd Quarter, Jan. 1-March 31, 2021)* (June 23, 2021), https://www.uscis.gov/sites/default/files/document/reports/N400_performancedata_fy2021_qtr2.pdf; see also DHS, USCIS, *USCIS, Historical National Median Processing Time (in Months) for All USCIS Offices for Select Forms By Fiscal Year, Fiscal Year 2017 to 2021 (up to June 30, 2021)* (June 2021) <https://egov.uscis.gov/processing-times/historic-pt>.

⁷ The current filing fee is \$640 + a \$85 biometrics fee, see "N-400, Application for Naturalization," DHS, USCIS last reviewed June 23, 2021, <https://www.uscis.gov/n-400>.

⁸ Pastor and Scoggins, 20.

⁹ Jens Hainmueller et. al., *A randomized controlled design reveals barriers to citizenship for low-income immigrants*, Nat'l Acad. of Sci. 115 (5) 939-944 (2018), <https://doi.org/10.1073/pnas.1714254115>.

¹⁰ See Michael Hotard and David D. Laitin, "The Trump administration is raising the application fee for U.S. citizenship. That will cost the U.S. later on," *Washington Post*, Apr. 7, 2020, <https://www.washingtonpost.com/politics/2020/04/07/trump-administration-is-raising-application-fee-us-citizenship-that-will-cost-us-later/>.

¹¹ DHS, USCIS, *Learn About the Citizenship and Integration Grant Program*, (May 17, 2021), <https://www.uscis.gov/citizenship/civic-assimilation/learn-about-the-citizenship-and-assimilation-grant-program>.

¹² Letter from Sen. Robert Mendez et. al. to the Committee on Appropriations (June 25, 2021).

grant program, which funds language instruction for naturalization purposes, would also help address another major barrier, language.¹³

III. Reducing Barriers to Naturalization: Recommendations for Congress

- A. Alleviate long processing times by appropriating \$500 million for naturalization backlog reduction.** This will increase agency efficiency in addressing the growing USCIS backlog of naturalization applications.
- B. Codify the existing regulatory fee waiver for all USCIS product lines, including naturalization.** Existing solely through regulation, fee waivers remain vulnerable to the particular politics of each administration. Ensuring that the existing regulatory fee waivers are enshrined in law by Congress will keep naturalization consistently accessible and affordable to eligible LPRs.
- C. Subsidize naturalization fees indefinitely.** Setting aside funding to reduce naturalization fees and mitigate against likely fee increases would decrease the financial barrier to naturalization and thus significantly increase the number of new Americans fully reaching their economic and civic potential. Based on FY19 application numbers and the current filing cost of \$725, Congress could reduce the costs to naturalize to \$100 by setting aside only \$528 million a year to subsidize naturalization applications.
- D. Set aside \$100 million for the Citizenship and Integration Grant Program.** This funding will allow an existing program to operate at its capacity and support communities across the United States in both welcoming new Americans and developing their economic and civic potential.

Incorporating these recommendations into the reconciliation process will both ameliorate existing barriers to naturalization, as well as allowing multiple existing government processes and programs to run as efficiently as Congress intended them to.

Thank you for your consideration of this request. If you have any questions, please contact Rosalind Gold at RGold@naleo.org.

Sincerely,

National

Alianza Americas
Alianza Nacional de Campesinas
Citizenship News
Dominicanos USA
Education and Leadership Foundation
Freedom Network USA
Hispanic Federation
Immigrant Legal Resource Center

¹³ Taylor, Paul, et al., An Awakened Giant: The Hispanic Electorate is Likely to Double by 2030, Pew Research Center (Nov. 2012), <https://www.pewresearch.org/hispanic/2012/11/14/iv-reasons-for-not-naturalizing/>.

International Rescue Committee
Language & Communication Associates
Mennonite Central Committee U.S.
Mexican American Bar Association
Mexican American Opportunity Foundation (MAOF)
NALEO Educational Fund
National Immigration Forum
National Network for Immigrant & Refugee Rights
National Partnership for New Americans
OCA - Asian Pacific American Advocates
Pro Bono Net
RAICES
United Stateless
We Are All America
Welcoming America

State/Local

Adhikaar
Alliance for a Better Community
Asian Americans Advancing Justice - Atlanta
Asian Americans Advancing Justice - LA
Asian Counseling and Referral Service (ACRS)
Bonding Against Adversity
Boulder Valley Unitarian Universalist Fellowship
California Rural Legal Assistance Foundation (CRLA Foundation)
CARECEN
Center for Community Action and Environmental Justice CCAEJ
Central American Resource Center of California (CARECEN Los Angeles)
Central Valley Immigrant Integration Collaborative (CVIIC)
Centro Binacional Para El Desarrollo Indígena Oaxaqueño (CBDIO)
Chaldean Community Foundation
Dominicanos USA
Education and Leadership Foundation
Emerald Isle Immigration Center

Employee Rights Center
GALEO Impact Fund
GMHC, Inc.
Greenfield Walking Group
Hmong American Women's Association
Illinois Coalition for Immigrant and Refugee Rights
Immigration Resource Center of San Gabriel Valley
Interfaith Refugee & Immigration Service, Los Angeles (EMM
Affiliate)
Latino and Latina Roundtable, org.
Latinos In Action
Legacy LA Youth Development Corporation
Long Beach Centro Community Hispanic Association (Centro CHA
Inc.)
Los Cien Sonoma County
Massachusetts Immigrant and Refugee Advocacy Coalition
Michigan Immigrant Rights Center
Mujeres Latinas en Acción
NCAAT in Action
New York Immigration Coalition
North Carolina Asian Americans Together (NCAAT)
OCA-Greater Houston
OCCORD
OneAmerica
Proyecto Inmigrante ICS, Inc.
Self-Help for the Elderly
Services, Immigrant Rights and Education Network (SIREN)
Tennessee Immigrant and Refugee Rights Coalition
The International Institute of Metropolitan Detroit
The Unity Council
TODEC Legal Center
Wind of the Spirit Immigrant Resource Center