

THE INFRASTRUCTURE OF A NATIONAL CITIZENSHIP PROGRAM

The United States has relatively open naturalization laws compared to most nations, a strong desire for immigrants to become citizens, a vibrant community of charitable organizations dedicated to assisting immigrants, and the necessary financial resources. In short, it enjoys many of the pre-requisites for a national citizenship program.

Additional requirements for a national citizenship program include: leadership by elected and public officials; money from federal, state, and city governments, foundations and donors; partnerships among different levels of government, charitable organizations, businesses, and private citizens; wide geographic coverage; legal immigration services; English and citizenship instruction; naturalization oath ceremonies; and evaluation methods and tools.

Government Leadership

The U.S. government’s support for citizenship has been tepid. It must make a substantial and visible commitment to a national citizenship program, including:

- a grand invitation welcoming immigrants to prepare for citizenship and encouraging them to obtain it as early as possible;
- appropriations for naturalization outreach, accessible and affordable naturalization application assistance, and English and citizenship instruction;
- improvements in customer services at the U.S. Citizenship and Immigration Services (USCIS), including faster processing of immigration and naturalization applications; and
- increased spending for general English language classes for limited English speakers prior to naturalization eligibility; and other policies that facilitate integration.

The need for political leadership is critical. Leaders in government at the federal, state, and local levels should be well-informed about immigration and naturalization rates and familiar with the special needs of vulnerable immigrants in the naturalization process. Elected and civic leaders should promote citizenship without suggesting that immigrants do not want to learn English or do not value becoming U.S. citizens. They should speak at naturalization oath ceremonies. (Chapter 11 describes the roles that national, state, and local leaders in public and private arenas can play in a citizenship program and offers numerous recommendations for how each sector of society can take action.)

The President and members of Congress must appropriate sufficient monies to the Office of Citizenship (OoC) to achieve its mission and implement a national citizenship program. It is time to take the training wheels off the OoC. Congress must enhance its mission with funds for charitable organizations capable of fulfilling the goals of a national citizenship program.

The OoC director and staff should adopt a comprehensive plan to promote citizenship and expand the availability of charitable naturalization services. OoC should seek external input from knowledgeable organizations to formulate a grant making process and use external reviewers for proposals. The OoC should work with stakeholders in designing new citizenship information materials and media campaigns and should continue to include stakeholder input in its citizenship test redesign initiative. (See Chapter 11 for recommendations for the Office of Citizenship and Chapter 6 on the citizenship test redesign process.)

Members of Congress should require USCIS to reduce long-standing benefit application backlogs and support the agency in doing so. They should ensure that USCIS operations can effectively respond to any sudden increase in naturalization or other immigration status applications. Finally, they should give USCIS full access to revenue in its fee account and allow flexible spending of its revenue so it can better respond to technological demands and rising processing caseloads.

USCIS leadership should balance its increasing attention on national security measures with improvements in customer services. Areas requiring improvements include: application-processing procedures, databases and other customer information systems, and trained staff to

complete all naturalization applications within six months of receipt. In addition, Congress and USCIS need to identify how to stem the rapidly rising naturalization application fee. Congress, USCIS, and the FBI must also create a fail-safe system to complete security clearances in a timely fashion for immigrants applying for immigration benefits, including naturalization. Neither the individual applicant nor the security of the country is well-served when the FBI or USCIS take one year or more to determine if an immigrant is a person of concern.

Political leadership by state and local government officials is equally important. A federally led national citizenship program should not supplant the good work currently supported by state and local government funding. Federal dollars alone will not meet the full need. State and local funding can support activities like specialized outreach, extended English training, legal assistance, and civic engagement. Local leaders can be a key source of policy and program evaluation information for the federal government and local participants.

Philanthropic and Corporate Leadership

Philanthropic foundations have demonstrated considerable leadership in promoting citizenship. Expanded foundation leadership is necessary to promote a national citizenship program to leaders in government, foundations, and corporations. Foundations should offer forums for these leaders and other stakeholders to discuss the recommendations of *A More Perfect Union* and provide input on the design of a national program. If the federal government implements a naturalization program, foundations will continue to play an important role. Foundations can support a national citizenship program by selecting citizenship and immigrant integration as a priority, providing start-up and matching dollars if required, and funding initiatives that are beyond the purview of federal support.

The business sector increasingly depends on foreign-born labor. As a result, business leaders need to be more vocal in their support of immigrants and more generous in giving money to charitable organizations that help immigrant communities. Interviewees for *A More Perfect Union* were consistently at a loss to identify significant business leadership or support for citizenship services and equally consistent in calling for more business involvement. Beyond funding, corporations can invite their employees to volunteer to help immigrants become citizens. (Chapter 11 provides recommendations for the business community with examples of how a few employers have been engaged.)

To date, public and private sector leadership on citizenship issues has been sorely lacking. When interviewees were asked to name a champion of citizenship for immigrants,

they offered few names and expressed disappointment over the lack of such champions in public and private life. A national citizenship program should be a draw for leaders from many segments of society because of its patriotic and bipartisan appeal.

Monetary Resources and Funding

Along with leadership, funding is needed to implement a national citizenship program. Funds have to be sufficient and sustainable under a long-term, “share the responsibility” plan, combining federal, other public, and private funders.

Funds for a national citizenship program must come first and foremost from Congress. Public funds acknowledge the nation’s civic interest in having more permanent residents become U.S. citizens. Congress demonstrated the importance of citizenship by establishing the OoC as part of the Homeland Security Act of 2002. The OoC’s mission is to “promote instruction and training on citizenship rights and responsibilities and to provide immigrants with information and tools necessary to successfully integrate into American civic culture.”¹ Yet funds for OoC’s FY 2007 budget are only \$3 million,² and come solely from fees paid by immigrants applying to USCIS for immigration status. This level of funding suggests that there is scant public interest in citizenship. Yet citizenship is the constitutionally enshrined linchpin of U.S. democracy, citizenship laws are established by the U.S. Congress, citizenship regulations are codified in the Federal Register, and the citizenship process is administered by a federal agency.

Congress must acknowledge the lack of leadership by the federal government and appropriate sufficient public dollars to support an increased level of citizenship engagement. The appropriate balance needs to be struck, fiscally and programmatically, between public and private responsibilities. This report does not call for the elimination of fee-based funds for citizenship promotion, but rather an increase in federal funds to build the infrastructure of a national program and leverage charitable and corporate contributions. To implement this program, Congress will need to make a statutory change and expand the OoC’s revenue to include monies from USCIS’s fee account and federal tax dollars. It may also need to authorize the office’s authority and purpose statement to include outreach and application assistance in its educationally focused mission. In doing so, members of Congress will make a bold, patriotic gesture in furtherance of the vision of the founding fathers who memorialized naturalization rights and opportunities in the U.S. Constitution.

Both federal and private funds are needed for multi-year cycles to see the goals of a national citizenship program achieved. The timing of outreach and services is an impor-

tant factor in helping immigrants start on the path to citizenship. Immigrants need to be informed about naturalization eligibility requirements early, at the point of entry or at the point of becoming permanent residents. Furthermore, early notification is important because vulnerable immigrants often need more time to overcome barriers.

Balancing Fiscal Responsibility

An important consideration for a long-term, national citizenship program is the need for the federal government to contribute adequately to the costs. A national program need not require a large government bureaucracy. After a national program infrastructure is built, matching funds from other public and private sources should be available. A more competitive grant making process, following successful implementation, can require leveraged funds, expanded partnerships, and more program creativity. Federal funding may decrease after the vast majority of current immigrants have naturalized and benchmarks of program sustainability have been achieved.

A combination of federal, state, city, philanthropic, and corporate dollars is necessary for the plan. (This is especially true if millions of immigrants become eligible for citizenship at the same time as a result of legislation passed by Congress to legalize the undocumented.) The problem today is the imbalance of funds. Current citizenship initiatives rely heavily on state revenue and philanthropic giving, both of which are unpredictable from year to year and region to region. From the mid-1990s to 2006, state governments and philanthropies have provided almost all funds for citizenship. These initiatives have documented effective models for citizenship services and demonstrated the effectiveness of pilot projects that can lay the groundwork for a national program. (See Chapter 10.)

Businesses, on the other hand, benefit from immigrant labor but rarely provide support to employees to learn English or become citizens. Businesses have the financial means to do more to help immigrants become citizens. A high profile panel of corporate heads, joined with other public leaders, would bring attention to the value of a national citizenship program and spur interest and financial support from other corporations.

Expanding the Office of Citizenship Budget

Many interviewees for this report agree that the OoC budget of \$3 million is insufficient for the office to accomplish its mission. One state, Illinois, currently allocates the same amount—\$3 million—for its citizenship initiative, as does the federal government. Because of a lack of funds, the OoC is restrained from providing all of its promotion and educational materials in print for free, requiring users to download the materials from the website and hindering access for immigrant groups most in need.

A More Perfect Union recommends funding at a level that would allow the OoC to: 1) staff community liaison officers in each of USCIS's 26 districts, up from the current level of 19 officers; 2) print and distribute free materials to newly approved Lawful Permanent Residents and Lawful Permanent Residents reaching eligibility for naturalization; 3) produce a multimedia citizenship campaign; 4) update its current materials and produce new ones, including a national citizenship curriculum; and 5) implement a national citizenship grant program. The OoC will need staff and outside support to create a mechanism to ensure that grant dollars are distributed according to need and to charitable agencies with a documented record of providing high-quality, affordable naturalization services.

Federal funding of the OoC needs to include set-asides for national training and technical assistance grants. A minimum of three national grants should be awarded. First, a technical assistance grant should focus on citizenship programming and naturalization services, including immigration law, naturalization law, program management skills, outreach strategies, partnership building, naturalization group application workshop models, administrative advocacy skills, reporting systems, and media and marketing. A second grant should promote best practices in ESL and citizenship programming and instruction, including curriculum improvements, train-the-trainer support for high-quality instruction, and program and student evaluation techniques. A third technical assistance grant should promote models for civic and patriotic engagement. Recipients of the three grants should function as an integrated team.

Proposed legislation in Congress seeks to authorize the OoC to establish a foundation to receive private donations, presumably from corporate donors. Such authority would place the federal government, with all of its resources and influence, in competition with nonprofits seeking direct access to philanthropic and corporate support. Having a federal agency as a large and costly middle manager would also hinder nonprofits in cultivating private donor relationships. The OoC should instead promote and steer contributions to nonprofits.

Funding for National Immigrant Support Organizations and Networks of Charitable Immigration Service Programs

Federal and large-scale private funding available for a national citizenship program should be directed to national and regional immigrant support organizations with networks of local charitable programs that provide comprehensive citizenship services, both legal and educational. Funding of local services should be prioritized to legal programs that are staffed by attorneys or representatives accredited by the Board of Immigration Appeals (BIA); regulated by, and in good standing, with the state bar association; and recognized by the BIA. Similarly, programs that use paid and volunteer teachers for English and citizenship instruction should follow accepted, high standards. (Chapter 7 recommends such standards.)

The BIA accreditation program was established to expand and regulate the availability of affordable, competent, legal immigration services by nonprofit organizations. The availability of such services through BIA-recognized agencies and accredited staff helps low-income immigrants avoid having to turn to unqualified consultants, frequently called “*notarios*,” who often lack competence and ethical standards and who cause immigrants great harm.³

It is important that a national citizenship program expand the authorized, rather than the unauthorized, practice of law. Although immigration law is regulated by federal statute and regulations, some state legislatures have taken the initiative to pass laws that define and prohibit unauthorized legal practices that harm immigrants.⁴ Funding organizations that can provide authorized, competent naturalization and citizenship services benefit both the provider and the applicant.

Creating Large-Scale Consortia Citizenship Programs

National networks are in the best position to establish large-scale consortia citizenship programs through their nonprofit member agencies. This model allows the federal government to manage a dozen or fewer large grants rather than hundreds of small grants. National support organizations have built-in capacities to develop consortia programs, submit multisite proposals, and manage multiple subcontractor reporting requirements. Furthermore, these organizations provide comprehensive training and technical support, program management, program monitoring, administrative advocacy, and fundraising guidance. This model was a strength of the nation’s largest recent citizenship program, the Emma Lazarus Fund, supported by the Open Society Institute in the late 1990s. (See Chapter 10 for details about this program.)

National support organizations can choose to fund other, nonmember grassroots agencies for direct services as long as high-quality citizenship service standards are maintained, particularly through attorney or BIA-accredited staff oversight of legal cases, and the agency commits to obtaining BIA agency recognition and staff accreditation. This outside subcontract arrangement can achieve two positive outcomes—expansion of high quality, affordable services and expansion of the authorized practice of immigration law.

National support organizations should redistribute funds based on five criteria: (1) need as measured by the number of Lawful Permanent Residents currently eligible and becoming eligible in the next three to five years; (2) the viability of expanding services where capacity is insufficient or institutionally weak; (3) the ability of programs to become self-sustaining by accessing matching funds from state and city governments, local foundations, and corporations; (4) the ability of local agencies to provide comprehensive, in-house citizenship services; and (5) the needs to support collaborative services between partner agencies when one-stop services are not available.

Support to national networks will create stronger partnerships among nonprofits at the national and local levels. Federal funding in particular should be used to strengthen ties between national and local charitable organizations. Funding should not be directed to state agencies, as they do not have a mission of providing immigrant services, have higher administrative costs, and lack built-in program support capacities. However, states can support a federal-nonprofit initiative by matching dollars to local programs. State monies can also support services not funded with federal dollars and help coordinate state-funded entities such as community colleges, adult basic education schools, and libraries as part of a national citizenship program.

Funding Priorities for Direct Services

Funding for direct services should be prioritized for stand-alone programs that provide all services in one location. Stand-alone funding may be required to support one organization in the smallest communities where the infrastructure and number of eligible recipients are too small to warrant multiple grants. Funding should be provided to at least one highly experienced organization in each state to help build capacity and expertise in new gateway communities.

Although comprehensive services should have priority, funders should not force all agencies to perform all functions. Some community-based organizations may lack the mission or capacity to support legal and educational services but may be adept at community outreach and referrals. Over time, more and more participating agencies

will either expand services or specialize within a local collaboration. Funders should allow local programs to design the service model based on local realities at a given time in the funding cycle.

Funding should be offered in tiers based on levels of program complexity. Maximum funding should go to organizations that provide all services in-house or have formal monetary and programmatic collaborations with other organizations to provide a full menu of prescribed citizenship services. Second tier funding should go to organizations that provide only the minimum level of naturalization services, including outreach, intake, application assistance, and legal representation. Third tier funding should go to organizations performing only community education and referrals to organizations in tiers one and two.

Funders should not invest in immigrant-impacted, metropolitan downtown centers to the exclusion of suburban and rural communities that have a rising number of immigrants but more modest infrastructure. Many traditional institutions such as schools, libraries, and places of worship in outlying areas can host citizenship services. Funding should be available for charitable immigration programs and ESL and citizenship instructors in major metropolitan areas so that they can collaborate with host organizations in suburban and rural areas and help to launch new programs. The creation of citizenship councils, particularly in suburban and smaller communities, can help identify where and how nascent citizenship programs can grow.

National support organizations should seek funds that are inaccessible or difficult for member agencies to acquire and facilitate member agencies' acquisition of local funds. While national and regional organizations should receive sufficient funding for their work, the great majority of funding should support local agencies.

Service Priorities

Direct service priorities for local programs should favor vulnerable immigrant groups: those with low-income, who speak limited English and have limited formal education; the elderly; the disabled; ethnic groups without national networks of their own; and nationalities underrepresented as citizens and voters. A second priority would be Lawful Permanent Residents without these characteristics but who require outreach, public education, and less intensive services. Charitable programs should avoid creaming the system for the easiest clients to serve.

Funding authorities should be clear as to what services, if any, must be provided for free or nominal fees. For services that are unfunded or partially funded, local programs should be permitted to charge fees.

Measuring Services and Outcomes

Funders should adopt a broad approach to measuring services and outcomes. The top two measures of success, especially for a new program, should not be numbers of citizenship applications filed and the number of immigrants becoming citizens. A successful start-up citizenship program may take up to two years to show desired results. The goal of the early years of the program should be to build local capacity, expand community involvement, solidify local and national ties, institute best practices, and broadly educate the immigrant community. Evaluation of numbers should be gradual, so as not to eliminate struggling programs prematurely.

Even after several years of implementation, compiling high numbers of applications and citizenship certificates should not be the program's main driver. An overemphasis on numbers could induce less than professional programs to encourage applicants to apply even if they are not eligible or likely to succeed, placing applicants at risk of arrest or deportation. In a competition for numbers, necessary collaboration among local community organizations may be eroded. In addition, critics may construe a focus on high numbers as a politically driven pursuit of new voters. The primary goal of a national citizenship program should be to expand public education about the naturalization process and provide accessible services that, in turn, help to raise and sustain the naturalization rate.

At the same time, numerical outcomes should be captured in program evaluation. Quarterly reports will be most helpful in assessing new programs for at least the first two years. Thereafter, highly successful and professional programs should be allowed to file semiannual programmatic and financial reports.

Funding may be based on cost reimbursement or fee for service. In a cost reimbursement agreement, payment is made in part based on a predetermined projected cost of the project. A fee-for-service contract involves paying service providers a predetermined sum for every unit of service delivered, presuming that the sum equals the actual cost of the service. For example, the cost of filing a completed Application for Naturalization is \$450 to cover the costs of intake, making referrals for service, answering all questions on the form, entering data into a database, preparing the applicant for an interview, and other pre-negotiated services.

For the first three years, funding should generally be based on a cost-reimbursement grant model. Only after capacity and baseline data have been established should a fee-for-service model be considered. A fee-for-service contract – if adopted at the start of the program – could overemphasize numbers and downplay capacity building, training, and

quality of service. Fee-for-service may work best in suburban and rural communities where there are fewer eligible applicants.

Ultimately, funding should promote capacity, collaborations, flexibility, creativity, and services to target populations with the greatest need for support.

Partnerships

Reaching, educating, and serving millions of immigrants will require strong public/private partnerships. Fortunately, the United States enjoys a robust network of charitable organizations established to help immigrants. A national citizenship program envisions a seamless web of services provided by a lead federal funder, matching grant funders, national support organizations with networks of charitable legal immigration service providers, English and citizenship instructional programs, immigrant organizers, civic leaders, volunteers, employers, and media outlets. The linchpin would be the partnerships between legal immigration service programs and those teaching ESL and citizenship.

A national citizenship program will require the coordinated efforts of many important sectors of society. Each sector – government, business, labor, faith-based groups, and national and community-based nonprofits — has a vested interest in citizenship and immigrant integration and a role to play in a national program. Some sectors are already engaged in citizenship or immigrant services, but all have the potential to contribute by promoting citizenship, providing monetary or other resources for naturalization assistance and English language classes, or offering human resources to assist immigrants in the naturalization process. An integrated citizenship program will foster immigrant integration into the broader society. (Chapter 11 presents 17 public and private sectors that have the authority and resources to participate in a national citizenship program and recommends a role for each sector.)

It is important not to think of these sectors in hierarchical terms, as much as links in a chain of citizenship promotion and naturalization services. Initiated by federal leadership, vital work on a citizenship program will be performed at the local level, where the goals and objectives will be achieved in partnership with state and city governments, employers, and community organizations. State and city governments will contribute funding, coordination, and reporting on local successes. Employers will promote citizenship to employees, contribute incentives, provide meeting space, and encourage employees to volunteer in citizenship programs. Media outlets are needed to disseminate messages on the importance of citizenship and how to obtain it. In response to recently proposed punitive legislation in Congress, English and non-English media outlets proved instrumental in mobilizing large numbers of immigrants to demonstrate, send advocacy letters, and natu-

ralize.⁵ Community-focused organizations that will be critical to the success of a citizenship plan include charitable immigration programs, refugee resettlement programs, immigrant social service agencies, immigrant community organizing groups, faith communities, libraries, and schools for children and adults.

Many of these sectors worked together during the “Americanization” movement of the early twentieth century. They should now work together again. From these partnerships, immigrants will gain more English language skills, learn U.S. history and civics, increase their attachment to the principles of the U.S. government, become more familiar with native-born citizens and their customs, be more civically engaged, volunteer to help other immigrants achieve their American dream, register to vote, and appear at the polls on election day.

The United States should not be overly confident that its laissez-faire approach to immigrant integration will work in the long run. It should not assume that it can avoid the turbulence seen in other countries that have severe disparities between native and foreign-born populations.⁶ The strengthened and expanded partnerships suggested in this plan can help achieve our highest ideals of democracy and integration. A national citizenship program should build the capacity of society to pursue even more immigrant integration policies and activities.

Geographic Scope

A national citizenship program should respond to the needs of prospective citizens and prepare for future naturalization demands. States and localities should be funded and function at a level commensurate with the size and diversity of their immigrant populations. More data on immigrant populations is needed, particularly on immigrants who may legalize in the next few years in areas with the newest and fastest immigrant growth rates, if Congress passes anticipated legislation to legalize the undocumented.

One study of Latino growth and settlement preferences divides the largest 100 communities into four groups: 1) 16 are “established Latino metros,” which already have a large Latino population that is growing slowly; 2) 51 are “new destinations,” which are areas with small Latino populations that are growing rapidly; 3) 11 are “fast-growing hubs,” which have large Latino populations that are expanding rapidly; and 4) 22 are “small Latino places,” which have a small Latino population that is growing slowly. Seven cities top the chart of Latino destinations with hypergrowth of over 600 percent from 1980 to 2000—Raleigh, N.C.; Atlanta, Ga.; Greensboro, N.C.; Charlotte, N.C.; Orlando, Fla.; Las Vegas, Nev.; and Nashville, Tenn.⁷ Nashville, like the other communities, is a “global interior” city where immigrants have moved in unprecedented numbers since 1990 and foreign-born popu-

lations are increasingly isolated by poverty and political disenfranchisement.⁸ For a national citizenship program, similar demographic studies of Lawful Permanent Resident populations, including citywide and neighborhood data, will be needed. “The immigration context varies tremendously between metropolitan areas. Therefore, it behooves every local government, community-based organization (CBO), and advocate to understand the characteristics of its local immigrant community.”⁹ (See Chapter 11 on demographic research recommendations and Chapter 10 on the Illinois New Americans Initiative’s strategies based on demographics.)

In addition to metropolitan centers, funders and program directors should have an understanding of where immigrants in suburban areas live, commute, work, recreate, and worship. The infrastructure of new gateway communities and suburban areas needs to be mapped with respect to the presence of charitable legal immigration programs, English classes, citizenship classes, and community outreach programs with multilingual capacity. It is likely that large disparities in immigrant services exist between distant suburban communities and city centers.

To foster local-to-regional collaborations, well-established metropolitan-based organizations should be given set-aside funds to create suboffices or to provide circuit-ride services in new growth communities until self-sustaining, stand-alone programs can be established. “Local and regional collaboratives can be beneficial . . . in helping to organize and disseminate local knowledge, and in promoting the duplication of what works well.”¹⁰ Like suburban communities, more rural towns can participate in a national citizenship program through appointments for mobile services hosted by local employers, schools, places of worship, or a legislative representative. The objective is to have a calendar of events and services responding to need in nonmetropolitan centers.

Charitable Legal Immigration Services

Charitable legal immigration programs chiefly provide immigrants with services for family reunification, adjustment of status, work authorization, and citizenship.¹¹ Most legal immigration services are provided by appointment to individuals and family members through a community-based organization. Typically, immigrants are assisted by an accredited paralegal working for a BIA-recognized agency or an attorney licensed by a state bar association. (There are approximately 450 BIA-recognized agencies providing immigration services. The largest consortium of agencies is the Catholic Legal Immigration Network, Inc. (CLINIC) with just over 200 BIA-recognized member agencies.) The bar association and BIA set important standards for legal practice. Added to this layer of standards are

charitable immigration programs’ own policies and procedures for case management and quality control.¹² Establishing the integrity of internal mechanisms and controls should occur before expanding services under a national citizenship program. Otherwise, a large increase in demand for services may place a strain on a weak program.

A national citizenship program seeks to serve ever-larger numbers of Lawful Permanent Residents, particularly those with the need for application assistance and English language instruction. Individual client appointments during daytime work hours may not be sufficient to meet expanding demand for services. One model—the naturalization group application workshop—can deliver quality services to greater numbers of applicants. (Chapter 9 describes the benefits and challenges of this model and gives step by step instructions for implementation.)

A naturalization group application workshop is a one-day community event bringing professionals and trained volunteers together to assist a large or small group of Lawful Permanent Residents in completing the Application for Naturalization (N-400). The roving naturalization workshop helps spread limited, high quality assistance as widely as possible and with as much equitable access as possible.¹³ This model was used effectively during the Open Society Institute’s Emma Lazarus Fund, which helped over 500,000 immigrants begin the naturalization process. (See Chapter 10 for details on the Emma Lazarus Fund.) While providing numerous programmatic and client service benefits, the model requires considerable planning and community resources.

As with individual direct services, a naturalization group application workshop must have quality control measures in place at all stages of the process, particularly at the beginning with intake and at the end with final review before an application is filed. If not performed with strict professional and programmatic standards, applicants can be harmed, resulting in arrest or removal from the country. Furthermore, malpractice claims can result, funding can be reduced, and organizational reputation and community partnerships can be damaged.

English and Citizenship Instruction

There is a pressing need today for more high quality English and citizenship instruction. Under a national citizenship program, the demand would be even greater. If Congress passes anticipated legislation that legalizes the undocumented and requires them to be tested in English, U.S. history, and civics, an already overburdened system may be overwhelmed. (Chapter 7 is written by five experts

who discuss student demographic and learning characteristics, program models, curricula requirements, teacher competency and training needs, and funding issues.)

Successful implementation of the national citizenship plan will require more collaboration among legal immigration programs and English and citizenship programs. Research for this project has identified significant room for improvement in this area. Both types of services need to be more available in-house with one-stop access. Shared funding, cross-training, cross-referrals, and joint case management will go a long way to help the most vulnerable immigrants become citizens. In addition, the Department of Education should require instructors of ESL and civics education grants to include content that promotes citizenship and prepares immigrants to pass the naturalization test.

Given the importance of U.S. citizenship, the new citizenship test that the OoC is preparing should be more relevant and meaningful in its selection of questions and answers.¹⁴ The challenge becomes how to make the test more meaningful, more instrumental in promoting attachment to the Constitution, and practical for adult civic learning without exceeding statutory requirements, posing an additional barrier to citizenship, raising the failure rate, or excluding applicants with language and learning difficulties. (Chapter 6 provides background information and recommendations on the redesigned citizenship test.)

If a more meaningful test is developed, there will be a matching need for new citizenship curricula and instruction. The question will be how to meet immigrant students' need to pass the test while helping them learn about the United States and identify themselves as Americans. The answer lies less in the type of curriculum and more in the instruction technique.

Critics of current citizenship courses assume all instructors simply teach to the test using rote memorization. Research suggests otherwise. Teaching to the test is only one of the tools for student retention and success. Instructors often use the test as a launching point for teachable moments on the complexities of U.S. history and government. Ironically, because the nation's least educated and literate new citizens are the ones attending English and other classes, they gain more exposure to meaningful content on U.S. history and civics than more educated immigrants who prepare for the test themselves and may simply memorize the test questions and answers. This anomaly suggests the need to improve the content and delivery of self-study materials.

In addition to improving self-study materials and expanding classroom instruction, short-term, high-impact citizenship exam preparation classes should be set up on an as-needed basis. This form of "just in time teaching"¹⁵ would draw from a compact curriculum on U.S. history,

civics, citizenship rights and responsibilities, and strategic English language skills for interviewing. Instruction will depend heavily on students' questions and responses. The curriculum will focus on how to pass the test, perform well in the interview, and learn how national and local political systems work and how to participate effectively in them.

A national citizenship program seeks to assist both groups of immigrants, the well-educated self-studiers and the limited English proficient students, to become patriotic Americans.

Naturalization Oath Ceremonies

The naturalization oath ceremony is a defining moment in the citizenship process. Elements of the ceremony include the confirmation of each applicant's identity and eligibility, relinquishing green cards to USCIS, changing names if desired, taking the oath of allegiance, hearing laudatory speeches, receiving a Certificate of Naturalization, and participating in a subsequent celebration.

Under legislative authority, federal judges preside over naturalization oath ceremonies. Alternatively, they may grant USCIS the authority to conduct administrative oath ceremonies. Typically, a judicial ceremony is held in the formal setting of a federal courtroom, while an administrative ceremony is held in a USCIS office or other location with a large enough space. A few USCIS district offices offer same-day oath ceremonies after the naturalization interview for people who have completed all the naturalization procedures. In metropolitan communities with large numbers of immigrants, judicial and administrative ceremonies may be held in large auditoriums or stadiums. In any of these settings, it is a day that should be remembered forever by the participants as cementing their ties and allegiance to their chosen country.

Special oath ceremonies are often conducted on commemorative holidays, such as Flag Day (June 14), Independence Day (July 4), and Citizenship Day (September 17). These events may be held at historical, patriotic, or other significant locations, such as Independence Hall, the Lincoln Memorial, or a federal park like Mount Rushmore. Often such unique ceremonies gain local, if not national, media coverage.

Symbolic and practical differences exist in the celebration of oath ceremonies. The form (judicial vs. administrative), day (ordinary vs. holiday), and place (courtroom, federal office, or public area) dictate the pomp and circumstance of the occasion. Administrative ceremonies in a federal office often lack the solemnity of judicial ceremonies. The willingness of the court or USCIS to seek community assistance in hosting the event also varies considerably and influences the atmosphere, the number of family and friends in attendance, and the presence of media. Because federal offices are often less commodious than courtrooms,

the number of people present may be limited, and honored guests or representatives of community-based organizations may not be invited.

To maximize the significance of the oath ceremony and citizenship, nonpartisan civic services need to be accessible to new citizens after the ceremony. Civic groups can share duties on a rotating schedule, especially for administrative ceremonies that tend to be smaller and more frequent. Large ceremonies, sometimes for several thousand new citizens, require significant coordination between government and private groups.

Courts and USCIS should announce oath ceremony schedules in advance and invite civic groups to attend. They should be supportive in welcoming community groups offering services, such as passport applications or appointments for legal immigration assistance to petition a family member to immigrate.

Voter registration by nonpartisan civic groups at oath ceremonies needs to be expanded across all board of election districts. Boards should provide the necessary quality control to ensure registration standards of accuracy and nonpartisanship. USCIS's policy states: "Voter registration may take place at naturalization ceremonies, as it is a good public service to do so. However, USCIS must use tact and good judgment to avoid any appearance of linking voting registration information with the endorsement of a particular political party or candidate. Nonpartisan groups are permitted to distribute information on voter registration to new citizens after naturalization ceremonies."¹⁶

A national citizenship program will bring added importance and attention to naturalization oath ceremonies. Courts and USCIS should reevaluate how they combine symbolic and practical measures in ceremonies to enhance the meaning of citizenship. They should ensure that ceremonies are more consistent in their solemnity and in the provision of services for new citizens. They should encourage more community participation and attention by welcoming honored guests, local civic groups, immigrant service organizations, and media. Participation by many sectors of society can help make naturalization oath ceremonies the hallmark of the nation's immigrant integration policy.

Values, Ethics, and Professional Standards

The participants in a national citizenship program need to adhere to strict ethical and professional standards. If they do not, clients can be harmed, partnerships will be compromised, and scandals may ensue.

Elected and appointed leaders should not attempt to use the program to grandstand for their own political purposes or reelection. Political parties should not engage in the citizenship effort simply to increase their membership and contact lists. Businesses should not seek to use the program's media coverage solely to promote their products and image. Nonprofits should not hoard resources to build up their own infrastructure, but rather build a network of community services. Community organizers should not use citizenship campaigns as a threat or political weapon against political officials.

In requiring professional standards of grantees, foundations should value all the inputs of a citizenship program. There are many important benchmarks of success even before an application is filed, including organizational capacity building, staff training, expanded outreach, new and strengthened partnerships, the acquisition of matching funds, expanded and improved ESL and citizenship courses, and more volunteer support at workshops and oath ceremonies. Funders should require grantees to report on these various benchmarks. (See Chapter 11 on "Philanthropic Foundations" for details.)

Direct legal immigration service providers must adhere to legal standards and to the requirements of their parent organizations. Applicants must be carefully screened to ensure eligibility based on immigration law and USCIS regulations governing admissibility and good moral character requirements. Applicants and documents should be screened by different staff at intake and before an application is filed. Program directors should establish financial guidelines that separate the functions of setting fee scales and collecting money from providing legal services.

Training for professional staff and volunteers — which is the backbone of capacity-building — promotes ethical standards, quality services, and client satisfaction. Thus, training for paid and volunteer outreach workers, legal representatives, and ESL and citizenship instructors should be well funded. Program directors should support early training for new staff before they assume heavy workloads.

Direct service providers must avoid selecting clients based on the ease of their immigration case or their higher level of English in order to improve outcomes for reporting purposes. Funding should prioritize and reward services to those with the greatest need for assistance. Success should be documented not just by the number of applications filed, but also by the benchmarks that facilitate gaining citizenship.

Sponsors of naturalization group application workshops should be careful to limit the size of workshops to ensure quality services. Preferably, workshops should be regularly scheduled to limit the need for infrequently scheduled

mega-events. Workshops should be small (100 to 150 applicants) and should have no more than a 10 to 1 ratio of applicants to staff or volunteers.

Program Evaluation Methods and Tools

Because of limited time, lack of funding, and inadequate knowledge of evaluation models and tools, program evaluation is often slighted or reduced simply to reporting on numbers. A true evaluation involves interpreting the numbers and receiving qualitative feedback against expected benchmarks. It also includes identifying trends and comparing these against program interventions.

One form of program evaluation is the client satisfaction survey. It is seldom used for immigrant services due to language limitations and low response rates by immigrant clients unfamiliar with, or distrusting of, surveys. However, two citizenship projects, funded by Florida and Illinois, have used client surveys successfully. (See Chapter 10 on these two statewide projects.) When properly designed in accessible languages, client surveys can be informative for both program managers and funders.

Baseline Data for Shared Modes of Intervention

A national citizenship program will necessitate acquiring baseline data on naturalization needs for use in designing interventions and reporting outcomes. At a minimum, baseline data should include demographics for populations who are or will be eligible for naturalization. Currently, most of this data is organized by states or top 10 cities. Data needs to be expanded to include at least the top 30 cities, with large metropolitan areas organized by neighborhood, metropolitan statistical area, or zip code if possible. Maps should show the concentration and dispersion of Lawful Permanent Residents by state and city. The data should be categorized by nationality, language group, education level, income, and English proficiency.

In addition to immigrant demographics, baseline data should be mapped to show service organization locations, including services provided, service area, target populations, and staff language capacities. This mapping will reveal where service gaps exist and where community services are clustered, which could lead to new collaborations in a neighborhood or city.

Program Design for Desired Outcomes

Backed by data, a national citizenship program can be designed that prioritizes populations eligible to become citizens. After establishing priorities, a national citizenship program can define program components including: 1) operationally defined outcomes, 2) benchmarks leading to outcomes, 3) measures of successful program performance, 4) monetary resource needs and levels, 5) outcome reporting requirements, and 6) data collection and methods. (Chapter 10 identifies eight program models using an array of funding that targets vulnerable populations with naturalization application assistance, English language training, test preparation classes, and civic engagement opportunities.)

For maximum efficacy, funders must develop these program components in close consultation with national networks of service providers and other stakeholders. Stakeholders should give the OoC or other federal funders input on critical design decisions. Similarly, when awarding matching dollars, other funders (state, municipal, philanthropic, and corporate) should support program components already adopted by the federal government in consultation with stakeholders. This coordination will eliminate the potential for competing goals and layers of onerous reporting requirements.

Use of Databases

Ongoing program evaluation will be facilitated by the use of databases to collect immigrant client characteristics, units of services delivered, and outcomes. A critical question for a national citizenship program is whether a single, web-based database is most beneficial to funders, national support organizations, and the network of direct service providers. Three statewide projects suggest the importance of a single data base.

The Central Valley Partnership for Citizenship in California, evaluated by the Aguirre Group, identified the lack of a single, web-based database as a weakness in adequately reporting common units of service to measure the program's total success.¹⁷ The Aguirre Group recommended a central database for any large, regional naturalization project.

Florida's Refugee Naturalization Project, begun in 2001 through the CLINIC network, used a web-based system to collect data from all eight of CLINIC's subcontractors. Under the fee for service contract, 11 units of service were recorded in the database. The results provided the basis for monthly reimbursement payments for services delivered.

Results were also used to evaluate contract compliance, delivery of services based on target population priorities, and overall project success.

In 2005 the Illinois Coalition for Immigrant and Refugee Rights (ICIRR) launched the New Americans Initiative, a statewide citizenship project, using a web-based database. As a project funded through cost reimbursements among 53 participating agencies, it does not use the database for reimbursement purposes. However, because the New Americans Initiative uses units of service similar to the Florida project, ICIRR can use the database to compare levels of service and gaps in service against its totals projected at the start of the project.

Database Benefits

The benefit of a web-based database is the ability to collect and store common denominators of service units reported by multiple service providers across a large region. Data can be used to compare actual versus projected numerical outcomes. Reports can be developed on specific service units by type or client characteristics. Similarly, data can show if services are being delivered according to set priority levels. For example, elderly and disabled refugees at risk of losing public benefits might be classified as priority level one; immigrants having low income, limited English proficiency, and at least five years of Lawful Permanent Resident status, as priority level two; and other immigrants with Lawful Permanent Resident status of five years or more, as level three.

This data allows funders to identify problems in contract performance, flaws in the program design, or systemic barriers beyond the project's control. In consultation with program participants, funders can then modify the program if needed. A well-designed national citizenship program database could become the central source for federally and privately funded outcomes. A single repository will allow easier access to data for national support organizations and local charitable agencies that are working together with combined federal and private dollars under one program. Database benefits also include a more accurate system to substantiate payment for services on either a cost reimbursement grant agreement or a fee for service contract.

Cost Analysis

Databases are not the only way to handle program information. A cost-benefit analysis may be needed when choosing between a central database and multiple user reports filed by uploading data from email or CDs. The cost should include money needed for the planning, design, and database system, and also time spent in maintenance, upgrades, training, and technical assistance for users.

Experienced users interviewed for this report suggest that web-based databases are more helpful in producing detailed, sophisticated analyses and less prone to human error than data collected from individually submitted files using compatible but different software systems.

Planning and Designing Databases for Evaluation

Most database problems are due to inadequate planning and too few inputs in the design by users. When setting up a database, a technical working group of users should be formed. Users include funding staff (contract, program, and database managers), social service providers experienced with databases, and software designers experienced as architects and engineers of social service databases. (Demographers can be important working group members, but the database should not be designed for demographic data collection for academic research, which could make the system more complex than necessary.) Together, these users must operationally identify the common denominator outcomes of a comprehensive citizenship program. If desired, outcomes can be reduced into incremental benchmarks that lead to citizenship, such as obtaining Lawful Permanent Resident status or gaining functional literacy in English.

Planners and designers should consider the type of people who would use the system on a daily basis. In the case of a national citizenship program, these people are mostly outreach workers, legal immigration service providers, and English and citizenship instructors. The scale of the system and level of complexity must be viewed within the boundaries of user skills and training opportunities.

Planners and designers also need to determine if a national citizenship program database can be created from an existing database to provide outreach, legal immigration counseling, and English and citizenship instruction. They also need to determine if a national database can interface with commonly used software systems, such as immigration case management software, to input data and thus avoid entering data twice.

Several manuals must accompany the design. First, a design manual needs to be written for current and future programmers to use when making modifications. Second, a step-by-step user manual is needed with every screen and field described by function. Third, a policy or rules manual must be written to guide proper use of the database's contents and identify which organizations will be database administrators and hosts. In addition, the manual will define the level of access to the national database, number and types of users per participating organization, password functions, security controls for levels of users and types of fields, and confidentiality rules.

A national citizenship program database could potentially have many users: a federal funder, possibly multiple state and municipal funders, a collection of national organizations with networks of service providers, and an array of local service providers. Issues of security and confidentiality are paramount with so many users and with sensitive client information, including Alien Registration Numbers, names, addresses, and other identifying characteristics.

A national citizenship program database should be designed to limit access to data by the federal government to only the information absolutely needed to show program outcomes. It is not appropriate that a federal funding source have access to immigrant Alien Registration Numbers or contact information. Similarly, the database can have horizontal controls between local users serving the same client with different services, allowing access only to the fields relevant to either organization. The database can be designed to place identification numbers or codes over sensitive information to restrict access vertically and horizontally.

Experienced users of citizenship program databases strongly recommend collecting only what is important and keeping the design simple to reduce errors. Exuberance in data collection can lead to overly detailed information that overlooks common denominators for all services and participating providers. Experienced users of social service databases recommend looking at where a person starts in the program, progress stemming from interventions (with subset benchmarks as needed), and desired outcomes. Qualitative reports can augment quantitative information, explaining reasons for success or lack of progress.

Database Implementation and Pilot Testing

A database for a national citizenship program should be piloted by a small group of national organizations with a network of local member agencies that provide all allowable services listed in the database. Participating organizations should be funded for the database pilot project, separate from services provided in the program. The funder or database manager must provide pilot sites with face-to-face training, manuals, and prompt technical assistance. Participating organizations should have a formal mechanism to record problems with the database and a forum to share problems with the designers and managers. The database should not be used nationally until the system has been fully endorsed by local users and all participating organizations have formalized their service infrastructure and partnerships. This process may take the first two years of the program. Until then, quantitative and qualitative data can be collected through less complex but still integrated means.

Database Challenges

The challenge of a national citizenship program database is the compatibility of the design with the actual services provided. Failure will occur if the buyer of the software ignores the input of experienced citizenship database users in favor of software marketers eager for a large government contract. Other challenges include providing adequate and ongoing training for a large, geographically diverse program with expected staff turnover. Maintaining tight security controls and confidentiality is also critical.

Conclusion

A More Perfect Union is rooted in thoughtful immigrant integration research and studies. It furthers the discussion of citizenship and the strengthening of U.S. democracy by prescribing a practical plan for a national citizenship program with detailed steps for implementation. The following chapters list the contributions required, the benefits expected, and how the benefits can be measured and evaluated.

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