



Submitted via email to: USCISPolicyManual@uscis.dhs.gov

December 1, 2020

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Office of the Director
20 Massachusetts Avenue, N.W.
Washington, D.C. 20529

RE: Policy Guidance Revisions: Civics Educational Requirement for Purposes of Naturalization

Dear Sir or Madam:

The Catholic Legal Immigration Network, Inc.¹ (CLINIC) respectfully submits the following comments related to recently announced changes to the civics test for naturalization and corresponding changes to the USCIS Policy Manual at Volume 12, Part E, Chapter 2, English and Civics Testing. These comments are based on the analysis of CLINIC's staff, who have extensive experience representing clients, insights from our affiliates and partners who regularly provide services to applicants for naturalization, and outside subject matter experts we consulted. Based on this expertise, CLINIC strongly opposes the new educational requirements and respectfully requests that USCIS rescind the new test and associated policy manual changes in their entirety.

Embracing the Gospel value of welcoming the stranger, CLINIC promotes the dignity and protects the rights of immigrants in partnership with a dedicated network of immigration legal services programs. This network includes approximately 380 programs operating in 48 states and the District of Columbia. CLINIC's network employs approximately 2,000 attorneys and accredited representatives that serve over 400,000 immigrants each year.

CLINIC's staff conduct trainings and provide technical support on the immigration-related legal problems faced by low-income immigrants. In 2019, CLINIC staff trained over 12,700 people online and in-person. Our affiliates regularly assist clients with applications for naturalization and many agencies within our network are actively engaged in preparing naturalization applicants for the civics and English tests required for naturalization. Thus, CLINIC and its network have a vested interest in any changes made to the naturalization process or the content of the tests.

As a Catholic organization, we are called to welcome the stranger and to serve our neighbors who seek safety and family unity in the United States. The Bible commands us: "You shall treat the

¹ Laura Burdick, Field Support Coordinator, and Karen Sullivan, Advocacy Attorney, primarily authored these comments with contributions from Jill Marie Bussey, Advocacy Director.

[stranger] who resides with you no differently than the natives born among you; have the same love for him as for yourself; for you too were once [strangers] in the land of Egypt.”² The new naturalization civics test content and procedures change the test in a way that would impede applicants from reaching citizenship status, and the rights and duties that accompany it. Therefore, we offer the following comments on USCIS’s proposed changes to its policy and procedures.

I. Background

USCIS announced on November 13, 2020, that it had revised the civics test for naturalization and the USCIS policy manual accompanying these changes.³ Knowledge of civics and American history has been required for naturalization since 1952, however, the exam was oral, and there was no standard test content, protocols, or scoring system until the test was standardized by USCIS in 2008.⁴ Some of the changes between the 2008 version and the 2020 version include:

- The 2008 version required officers to ask examinees 10 questions, and examinees needed to answer 6 correctly to pass. The 2020 version maintains the 60 percent pass rate, but officers ask examinees 20 questions, and examinees must answer 12 correctly to pass.
- The 2008 version required examinees to study a list of 100 civics questions. The 2020 version includes 128 questions.
- Only 40 questions were maintained unchanged from the previous version to the new version; the rest were reworded or introduced as new questions.
- The complexity of the vocabulary required to learn and understand the test questions has significantly increased.
- The answers to some questions have been changed based on political influence, rather than accuracy.

Applicants who apply for naturalization on or after December 1, 2020, will take the updated version of the test. Those who apply before December 1, 2020, will take the current version of the test.

II. The Rules Surrounding the Civics Test Have the Force and Effect of Law, and Therefore Should Go Through Notice and Comment under the APA

The rules surrounding the civics test for naturalization that establish the number of questions to study, the number of questions an examiner will ask, and the number of questions an applicant must answer correctly to pass the test have the force and effect of law on applicants. Therefore, under the Administrative Procedure Act (APA), these rules should be considered legislative rules, not interpretive rules, and should have been subject to regulatory notice and comment upon their initial establishment, and again now, as they are being revised.

² Leviticus 19:33-34.

³ U.S. Immigration and Citizenship Services, *Civics Educational Requirement for Purposes of Naturalization*, Policy Alert PA-2020-20 (Nov. 13, 2020), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20201113-CivicsTest.pdf>.

⁴ Sarai Martinez-Suazo, *Timeline of US Naturalization Law/Civics Exam*, University of Virginia (2015), https://med.virginia.edu/family-medicine/wp-content/uploads/sites/285/2017/02/Sarai-Martinez-Suazo-US-Naturalization_Web.pdf.

According to the APA, the notice-and-comment requirement does not apply to “interpretive rules, general statements of policy, or rules of agency organization, procedure, or practice.”⁵ However, in order to be considered an interpretive rule, the rule must not be binding on the public or “have the force and effect of law.”⁶ Decisions that affect whether portions of the public will be able to successfully pass the civics test and become naturalized United States citizens are binding on the public and have the force and effect of law on those individuals whose cases will be denied based on this policy change.

The policy changes increase the number of questions that the public must study by 30 percent, increase the complexity and vocabulary level of the questions, and require examinees to sit for a test that is twice as long as it was previously. These are significant increases in difficulty and will cause more applicants to fail the civics test. When a portion of the public will lose access to U.S. citizenship as a result of agency action, that action is certainly binding on the public and has the force and effect of law. Therefore, these policies are subject to notice-and-comment rulemaking under the APA. CLINIC recommends that USCIS withdraw the policy and if it wants to re-issue the policy, it must do so as a proposed rulemaking under the APA.

III. The new testing requirements will greatly increase the burden on applicants, USCIS, and service providers.

The changes described above will cost additional time, resources, and effort not only for applicants, but for USCIS and legal services providers as well. We detail those additional burdens below.

Applicants. Applicants will need to study 128 questions instead of 100, so there is more content to learn, and many of the questions are more difficult. Applicants will need more time to prepare for the test. More applicants will be unable to prepare on their own, and will need to take a citizenship class, if they can find one that is available in their community. More applicants will fail the test at their first interview and will need to return for a second interview to try again, requiring more time off work and greater struggle on their part.

USCIS. USCIS will require more time to administer the new test since there are 20 questions instead of 10 and adjudicators must ask all 20 questions instead of stopping when the applicant receives a passing score. The time needed to administer the new test will be at least doubled, if not more. This means fewer naturalization interviews can be conducted in the same amount of time, and will further increase the existing, severe backlogs. More applicants will fail the test at the first interview, requiring USCIS to schedule more second interviews, again exacerbating the backlogs.

In addition, the USCIS Office of Citizenship will need to spend an enormous amount of time re-tooling most of the test preparation materials on its website,⁷ such as: Learn About the United

⁵ Administrative Procedures Act, 5 U.S.C. 553(b)(A)

⁶ *Perez v. Mortgage Bankers Ass’n*, 575 U.S. 92 (2015), citing *Chrysler v. Brown*, 441 U.S. 281, 302-303 (1979)

⁷ USCIS offers 51 test preparation documents for students on its website: https://www.uscis.gov/citizenship/find-study-materials-and-resources/study-for-the-test?doc_type=All&query=&items_per_page=10&page=0

States: Quick Civics Lessons;⁸ an MP3 audio version of the study questions (English and Spanish); a video with scenes from a mock citizenship interview; and numerous resources for educators⁹ that are based on the previous test. USCIS will also need to produce six new translations of the study questions, which are currently available on its website in Arabic, Spanish, Tagalog, Vietnamese, Chinese, and Korean.

Service Providers. Community-based organizations that help applicants prepare for the test will need to re-tool their classes and their materials, at great cost. Students will need more time to prepare for a longer, more difficult test, so classes will need to be extended, with more expenses for teachers' salaries. More students will need to take additional classes or repeat sessions, beyond the normal timeframe of 6-10 weeks. More students will need one-on-one assistance from a tutor. Curricula and lesson plans that have worked well for the last decade will need to be revised, with a great deal of new material incorporated.

Support organizations such as CLINIC will be burdened by the need for major revisions to our test preparation materials, such as our 100+ page study guide¹⁰ and our collection of translations¹¹ of the civics questions in 19 languages. We will also need to revise all of our naturalization-related training materials for affiliates to reflect the new testing requirements, while conducting new trainings and outreach for our network to prepare them for the new test.

IV. The new test will drive up the denial rate, with far-reaching consequences for our nation.

The new test is clearly designed to be harder than the previous test and could prevent tens of thousands of people from naturalizing each year by causing their applications to be denied.¹² Instead of studying 100 questions, applicants must study 128, so the content has been expanded significantly. In addition, the number of questions on the test has been doubled, from 10 to 20. Many of the questions have been re-phrased to be more difficult. For example, the previous test asks applicants to name three of the original 13 states, while the new test asks for five. Also, some of the answers now require abstract wording that will be difficult for students with limited English proficiency to understand. An adult education expert who reviewed the new test found that USCIS seems to be “asserting that citizenship applicants are now expected to study and perform at a secondary level of education” which is significantly higher than the previous test and would leave behind those immigrants who have not had a secondary education.¹³

⁸ U.S. Citizenship and Immigration Services, *Learn About the United States: Quick Civics Lessons for the Naturalization Test* (Feb. 2019), https://www.uscis.gov/sites/default/files/document/flash-cards/M-638_red.pdf.

⁹ U.S. Citizenship and Immigration Services, *Resources for Educational Programs* (Last Updated Nov. 13, 2002), <https://www.uscis.gov/citizenship/resources-for-educational-programs>.

¹⁰ Catholic Legal Immigration Network, Inc., *The Citizenship Test* (Jan. 21, 2020), <https://www.uscis.gov/citizenship/resources-for-educational-programs>.

¹¹ Catholic Legal Immigration Network, Inc., *Translation of Civics Questions and Answers for the Naturalization Test* (Jan. 1, 2019) <https://cliniclegal.org/resources/citizenship-and-naturalization/citizenship-test-preparation/translation-civics-questions>.

¹² The current, cumulative pass rate for the citizenship test is 91 percent. In Fiscal Year 2019, USCIS received 830,560 naturalization applications. If the pass rate had decreased by just 5 percent, from 91 percent to 86 percent in FY 2019, it would have caused over 40,000 people to be denied.

¹³ Posting of Lynne Weintraub to the Naturalization Working Group listserv (Nov. 17, 2020) (on file with author).

The full impact of a higher denial rate can be illustrated by an analysis of current pass rates compared to the number of naturalization applicants. The current, cumulative pass rate for the citizenship test, as reported by USCIS, is 91 percent. In FY 2019, USCIS received 830,560 naturalization applications. If the pass rate had decreased by just 5 percent, from 91 percent to 86 percent in FY 2019, it would have caused over 40,000 people to be denied. Over 10 years, this would multiply to more than 400,000 people denied. This impact will be borne by the most vulnerable applicants: those who are elderly, disabled, low income, limited English proficient, and who have less formal education. These applicants will find themselves locked out of their dreams of citizenship and could become a permanent underclass in our society, unable to fully integrate and participate in our democracy. CLINIC believes that citizenship, with all of its rights and responsibilities, must be available to *all* people, not only the elite, well-educated and able-bodied, in a free and democratic society.

In 2005, the Director of the Office of Citizenship, the USCIS office leading the test revisions, assured stakeholders that the new test would not be more difficult than the current one. Indeed, USCIS kept its promise and was able to verify this with a records study of pass rates before and after the new test was implemented. The final records study that USCIS released in July 2011 showed an overall pass rate of 96 percent.¹⁴ CLINIC calls on USCIS to make the same pledge for the new test. The citizenship test should not reinforce the world's educational inequities, particularly for those who were denied a basic education in their native country.

A higher denial rate and more daunting test will discourage many potential citizens from applying for naturalization and suppress application rates for years to come. Instead of welcoming new citizens and recognizing that our entire nation benefits when more immigrants naturalize, the United States would erect another barrier for those seeking citizenship, at great harm to our nation.

V. The methodology used by USCIS to revise the test was fundamentally flawed from the beginning.

CLINIC has many serious concerns about the process and methodology used by USCIS in creating the new test. Most importantly, there was no transparency. USCIS shared very little information with the public on the revision process or the rationale for the changes. An incomplete history of the process based on information CLINIC has been able to gather raises many more questions than it answers, while exposing serious doubts about the legitimacy of the new test.

We understand that the process began in secret in December 2018, when USCIS formed an internal naturalization test revision working group with members from across the agency to review the civics questions and consider changes to the English-speaking portion of the test. USCIS has not disclosed the names of those invited to participate in the group or their qualifications to make recommendations on the content and design of the citizenship test.

On May 3, 2019, USCIS issued an internal memorandum to the USCIS Associate Directors and Program Office Chiefs announcing a revision of the civics test and a decennial revision schedule. The rationale provided in the memorandum was “to ensure that USCIS will continue to responsibly

¹⁴ The records study found that the overall pass rate for the new test released in 2008 was *higher* than the pass rate on the old test: 96 percent vs. 94 percent.

exercise the discretion Congress afforded it by administering the citizenship test in accordance with best practices.”¹⁵ USCIS also cited a need for standardized tests to be revised regularly in order to counter “fraud or nefarious actions” but provided no evidence of this problem with the citizenship test. Like the working group, USCIS kept the memorandum a secret.

Finally, seven months after the process had begun, USCIS publicly announced the plans to revise the citizenship test on July 19, 2019. At this time, USCIS disclosed the working group and the memorandum from USCIS leadership. The announcement gave a planned implementation date of December 2020 or early 2021. On the same day, USCIS posted a solicitation for a contractor to perform Technical Advisory Group (TAG) duties for the revised citizenship test, with a closing date of August 5, 2019. The announcement on the test revisions prompted a July 24, 2019 letter from members of Congress to USCIS expressing concerns about the burdens posed by a new test and requesting information on the process and rationale. USCIS responded to the letter on August 7, 2019. The response mentioned that the “first pilot test” was planned for fall 2019 in coordination with community-based organizations.

We understand that in August of 2019, USCIS’ Office of Citizenship sent a letter of invitation to potential participants for the first pilot that was planned for October 2019. Some organizations agreed to participate in the pilot, but later dropped out when they realized the extent of the burdens involved to teach a great deal of new content to their students, who were already trying to prepare for the current citizenship test.

According to our research, USCIS selected TESOL to run the TAG in September 2019. TESOL selected TAG members through an application process calling for subject matter experts. The members and activities of the TAG were not disclosed to the public “due to the confidential nature of the test development.”

We understand that the TAG had its first meeting with USCIS in Washington, D.C. on October 9-11, 2019. On October 11, the pilot abruptly collapsed without any explanation. The organizations that were participating in the pilot were simply told to stop immediately. Subsequent USCIS announcements on the new test have not mentioned that first pilot at all, even though USCIS initially planned to conduct two pilots.

A second pilot that USCIS planned for spring 2020 had to be pushed back due to the pandemic. Finally, on May 28, 2020, USCIS sent an e-mail invitation to its grant recipients for participation in a pilot to be conducted remotely in July-August. The pilot was scheduled to begin on July 6, 2020. Organizations were given a revised list of test questions to teach their students over a very brief period, and students self-selected to participate in the pilot. As with the first pilot, there were organizations that dropped out due to the burdensome demands of the pilot on their students and staff, and participants were not permitted to share any information about the pilot. The pilot ran briefly, for approximately five weeks, and ended on August 13, 2020. It appears that only about

¹⁵ Memorandum from L. Francis Cissna, Director, U.S. Citizenship and Immigration Services to USCIS Associate Directors and Program Office Chiefs, “Revision of the Naturalization Civics Test” (May 3, 2019) https://www.uscis.gov/sites/default/files/document/memos/Revision_of_the_Naturalization_Civics_Test_D1_Signed_5-3-19.pdf.

200 students participated in the pilot of the new test, while the 2008 test was piloted to more than 6,000 students.¹⁶

Just three months later, on November 13, 2020, USCIS announced the new test and provided a revised list of 128 civics questions. Despite the major delays and changes to the process that were caused by the pandemic, USCIS managed to release the new test ahead of its initial timeline of December 2020-early 2021. USCIS chose to double the number of questions on the test, from 10 to 20, and to ask all 20 questions of applicants, instead of stopping when they achieve a passing score. A USCIS spokesperson said that doubling the number of questions “provides a more accurate measurement” of applicants’ understanding of civics and “ensures the reliability and validity of scores.”¹⁷ Yet, to our knowledge, no one with professional expertise in assessment was involved in the test redesign process.

USCIS’s process to revise the civics test lacked transparency and stakeholder outreach, it lacked the input of subject matter experts, and it lacked a sufficient pilot process that could demonstrate a comparable passage rate. This test is not ready to be implemented. CLINIC suggests that USCIS withdraw the test, seek additional stakeholder feedback, additional feedback from subject matter experts, and to pilot the test to a far larger number of students.

VI. The content of the citizenship test was changed dramatically without sufficient justification or analysis on the impact of implementing a more burdensome and time-consuming test.

USCIS made major changes to the content of the citizenship test. The number of study questions was increased by almost 30 percent, from 100 to 128. A side-by-side comparison of the new test with the previous version shows that only 40 of the old questions were retained, while the rest (88 questions) are either new or re-phrased.¹⁸ An analysis of the test by an expert in adult education who consulted on the 2008 test redesign project found that 47 questions (both new and re-phrased) are problematic.¹⁹ The reasons they are problematic include: use of abstract words, phrases are difficult to remember or produce, the answer is more demanding than the previous version, advanced cognitive level, unnecessarily complex phrasing, advanced level vocabulary, awkward grammatical structure, and very high conceptual level. Some examples include:

- What is the purpose of the 10th Amendment? • (It states that the) powers not given to the federal government belong to the states or to the people.
- What was the Great Depression? • Longest economic recession in modern history.
- Why do U.S. representatives serve shorter terms than U.S. senators? • To more closely follow public opinion.

¹⁶ U.S. Citizenship and Immigration Services, *USCIS Announces New Naturalization Test*, News Release (Sept. 27, 2007).

¹⁷ Maria Sacchetti, *Trump Officials Unveil New U.S. Citizenship Test, as Advocates Worry It Is Too Long, Difficult, and Politicized*, WASHINGTON POST (Nov. 13, 2020), https://www.washingtonpost.com/immigration/new-us-citizenship-test-trump/2020/11/13/2029723e-25e9-11eb-8672-c281c7a2c96e_story.html.

¹⁸ Some questions have been re-phrased to be more difficult. For example, the previous test asks the applicant to name *three* of the original 13 states, while the new test asks the applicant to name *five*.

¹⁹ The questions were reviewed by Lynne Weintraub, a long-time adult educator, textbook author, test developer, and consultant on the 2008 test redesign project.

In addition, some of the questions are blatantly political in nature. In these questions, USCIS seeks to dictate to members of Congress their scope of representation:

- Who does a U.S. senator represent? • Citizens of their state (changed from “all the people” of the state)
- Who does a member of the House of Representatives represent? • Citizens in their (congressional) district • Citizens in their district

It is unclear why such major revisions are necessary, when so much time and effort went into the previous test revision process over a six year period, with a great deal of input from subject matter experts, including the National Academy of Sciences.²⁰ USCIS has not provided sufficient justification for replacing previous content, adding new content, and re-phrasing existing content on the test, as the entire process was conducted in secret with no opportunity for stakeholder input. In addition, USCIS has not shown that it consulted with experts in assessment, or that it incorporated the recommendations of the experts on the TAG. If USCIS had used the APA process to make changes to the test, we would know the answers to these questions because the methodology would have been explained.

In its initial announcement on the test revisions in July 2019, USCIS stated that the new test would be meaningful and would “serve as an accurate measure of a naturalization applicant’s civics knowledge.” However, by increasing the level of difficulty, USCIS has achieved the opposite. One expert notes, “As a teacher and textbook author, I will be forced to coach students to do rote memorization, rather than try to explain the content, because the conceptual level is too high for beginner or intermediate-level students.”²¹

USCIS has not addressed how implementing a test that doubles the length of the test taking portion of the naturalization interview will impact its current backlog of naturalization applications and burgeoning processing times.²² The processing delays have only worsened during the pandemic,²³ making it difficult to understand how USCIS will be able to improve processing times, clear backlogs, and implement a new test that will require more interview time. USCIS should provide the public with a full analysis of how it plans to manage the additional burdens of transitioning to the more time-consuming test while also reducing its backlog of applications. Further, USCIS should advise the public of how it intends to do this without also adding to its significant financial issues.²⁴

²⁰ See CATHOLIC LEGAL IMMIGRATION NETWORK, INC., A MORE PERFECT UNION 51-58 (2007) (providing a history of the test revision process that culminated with a new test in 2008) <https://cliniclegal.org/resources/citizenship-and-naturalization/more-perfect-union-national-citizenship-plan>.

²¹ Posting of Lynne Weintraub to the Naturalization Working Group listserv (Nov. 17, 2020) (on file with author).

²² DHS Office of the Citizenship and Immigration Services Ombudsman, *Annual Report to Congress* (June 30, 2020), www.dhs.gov/sites/default/files/publications/20_0630_cisomb-2020-annual-report-to-congress.pdf.

²³ Michelle Ye He Lee, “Citizenship applicants caught in backlog distraught over inability to vote this year: ‘I feel like my voice is not going to count,’” WASHINGTON POST (Aug. 31, 2020) www.washingtonpost.com/politics/citizenship-applicants-caught-in-backlog-distraught-over-inability-to-vote-this-year-i-feel-like-my-voice-is-not-going-to-count/2020/08/31/b77271ca-e932-11ea-970a-64c73a1c2392_story.html.

²⁴ Press Release, Deputy Director for Policy, U.S. Citizenship and Immigration Services, Statement on USCIS’ Fiscal Outlook (June 25, 2020) <https://www.uscis.gov/news/news-releases/deputy-director-for-policy-statement-on-uscis-fiscal-outlook>.

VII. CLINIC Objects to the Short Period of Time Provided to Comment in the Midst of a Pandemic as Well as the Insufficient Time Provided for Transition

CLINIC opposes the short period of time in which to submit comments regarding this significant change. The public was given one month to respond to the changes to the policy manual, and halfway through that period, the changes go into effect. The changes to the civics test and the policy manual are significant and will have far-reaching effects on the naturalization process. One month is not enough time for the public to fully analyze the new test and meaningfully respond to this policy change. Under any circumstances, it would be wrong for the government to provide such a short time period to comment on changes that are this extensive, but the challenges to timely respond to the changes are currently magnified by the ongoing COVID-19 pandemic. The Centers for Disease Control and Prevention (CDC) have acknowledged the added stress of performing job functions during COVID-19.²⁵ Further, the agencies involved with immigration have been publishing a large number of proposed rules and policy changes in recent weeks, and practitioners must respond to them all in a similarly short period of time.

CLINIC also opposes the unreasonably short period of time that USCIS has provided in implementing the new test. In 2007, when USCIS announced the new civics test questions, it provided over a year for implementation. Specifically, USCIS' September 27, 2007, announcement reads, "(b)eginning October 1, 2008, U.S. Citizenship and Immigration Services (USCIS) will begin implementation of a redesigned naturalization test. All applicants who file for naturalization on or after October 1, 2008 will be required to take the redesigned test. For those applicants who file prior to October 1, 2008 but are not interviewed until after October 1, 2008 (but before October 1, 2009), there will be an option of taking the redesigned test or the current one."²⁶ In a sharp turn from its past practice, USCIS is now implementing the new civics test with just two weeks of notice which, as noted above, does not provide sufficient time for agencies that provide citizenship test preparation materials and training, to update their resources. We urge USCIS reconsider this unnecessarily aggressive timeline for implementation and delay implementation by at least one year.

For these procedural reasons alone, we urge the administration to rescind the policy and test changes. If it wishes to reissue the new test and associated policy manual changes, it should grant the public at least 60 days to have adequate time to analyze the new test and provide comprehensive comments and should provide a minimum of one year before implementing the new test. The government should welcome suggestions from experts in the field; instead the length and complexity of the new test coupled with the brevity of the comment period has left experts unable to sufficiently evaluate the changes and comment.

²⁵ See Centers for Disease Control and Prevention, *Employees: How to Cope with Job Stress and Build Resilience During the COVID-19 Pandemic*, May 5, 2020, <https://www.cdc.gov/coronavirus/2019-ncov/community/mental-health-non-healthcare.html>.

²⁶U.S. Citizenship and Immigration Services, *USCIS Announces New Naturalization Test*, News Release (Sept. 27, 2007).

VIII. Conclusion

We request that USCIS withdraw the new civics test and associated policy manual changes based on the objections described above. If USCIS wishes to proceed with these changes, it should do so after additional stakeholder feedback, contributions from subject matter experts, and pilot testing, and the new test should be introduced through the notice and comment process under the APA.

Thank you for your consideration of these comments. Please do not hesitate to contact Jill Marie Bussey, Director of Advocacy, at jbussey@cliniclegal.org, with any questions or concerns about our recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Anna Marie Gallagher". The signature is written in a cursive style with a large initial "A".

Anna Marie Gallagher
Executive Director