



A More Perfect Union: A National Citizenship Plan



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A More Perfect Union: A National Citizenship Plan

WRITTEN BY **JEFF CHENOWETH** AND **LAURA BURDICK**

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TABLE OF CONTENTS

- In Memoriam to Margaret A. “Peggy” Dean i
- About Catholic Legal Immigration Network, Inc. (CLINIC) ii
- About the Authors ii
- Methodology Used to Produce *A More Perfect Union* iii
- Interviewees for *A More Perfect Union* iv

- Executive Summary** vii

- Chapter 1: The Need for a National Citizenship Program** 1

- Chapter 2: The Infrastructure of a National Citizenship Program** 21

- Chapter 3: The Naturalization Application Process** 35

- Chapter 4: Barriers & Challenges Posed by USCIS in the Naturalization Application Process** 39

- Chapter 5: Systemic Barriers to Naturalization That Congress Can Address** 47

- Chapter 6: The Citizenship Test** 51

- Chapter 7: Preparing Immigrant Learners for Citizenship** 59
 - Different Learners, Different Services
by Lynne Weintraub 59
 - Competencies for Citizenship Teachers
by An McDowell 64
 - ESL and Citizenship Program Models
by Susan Wexler 68
 - In-Class Curricula Priorities for Integrated Citizenship Program Models
by Gretchen Bitterlin 74
 - Current Funding of Adult Basic Education/ESL Services
by Lynne Weintraub and Linda Taylor 78

- Chapter 8: Characteristics of a Successful Local Citizenship Program** 85

- Chapter 9: Naturalization Group Application Workshops** 93

- Chapter 10: Recent Naturalization and Citizenship Projects: Lessons Learned for a National Citizenship Program** 101
 - Citizenship USA 101
 - Naturalization Pilot Project in Southern California 103
 - Emma Lazarus Fund 105
 - Central Valley Partnership for Citizenship 107
 - ORR Refugee Naturalization Projects 110
 - State of Florida Refugee Naturalization Project 112
 - State of Illinois New Americans Initiative 114
 - Citizenship AmeriCorps Project 116

Chapter 11: Sectors of Society Supporting a National Citizenship Program	119
The Executive Office of the President of the United States	119
The Congress	121
U.S. Citizenship & Immigration Services	124
The Office of Citizenship	128
The Office of Refugee Resettlement	130
State Governments	132
City Governments	136
Public Libraries	139
Philanthropic Foundations	142
Research Institutions	146
Legal Institutions	151
Immigrant-Focused Nonprofit Organizations	154
Marketing and Outreach	159
Faith Communities	163
Civic Organizations	166
The Businesses Community	168
Labor Unions	171
Chapter 12: Commentaries	173
Preparing Naturalization Applicants for Active and Effective Civic Participation <i>by Edward Kisam</i>	173
From the Oath of Citizenship to the Oath of Office <i>by Ann Morse</i>	174
Patriotic Integration is the Key to Successful Immigration <i>by John Fonte</i>	177
Effective Integration Requires Citizenship <i>by Edwin B. Silverman</i>	178
Justice Denied: Inadequate Legal Aid for Low-Income Persons in the United States <i>by Robert J. Rhudy</i>	180
Expanding Naturalization by Supporting Service Providers: The Role of Legal Resource Centers <i>by Eric Cohen</i>	181
Investing in Our Workforce: The New Americans Initiative <i>by Eva Millona</i>	183
A Chronology of Naturalization Funding in Maryland <i>by Gail Kramer Mogol</i>	184
State Support for Citizenship: An Illinois Perspective <i>by Fred Tsao</i>	186
Building Community, Building Trust: Citizenship Efforts in the Arab-American Community <i>by Karen Rignall</i>	187
Citizenship for Seniors <i>by Robert Moser</i>	188
Bringing Community Groups into the Citizenship Classroom in Formal Collaborations: Lessons from Chicago <i>by Aliza Becker and Sandra Del Toro</i>	190
Teaching Citizenship Classes <i>by Peter J. Slevin</i>	191

In Memoriam to
Margaret A. “Peggy” Dean
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Margaret A. “Peggy” Dean was an irreplaceable source of knowledge, support, and friendship for adult education professionals and immigrants alike. Ms. Dean was known in Illinois and throughout the country as a leader in the field of citizenship education and policy. She dedicated herself to such programs by helping set up citizenship training courses for community-based organizations and community colleges throughout Illinois, hosting educator interest group meetings and developing a website of teaching materials. She worked closely with the U.S. Citizenship and Immigration Services (USCIS) District Office in Chicago and facilitated a long-term, productive working relationship between citizenship educators and USCIS. Ms. Dean was emerging as a national spokesperson among immigrant advocates concerning the citizenship test redesign process and had recently presented before the National Academy of Sciences in Washington, DC on the proposed redesign.

Ms. Dean was an English as a Second Language/Naturalization Instruction Working Group member and advisor to Catholic Legal Immigration Network, Inc. for this report prior to her death. As part of the project, she conducted interviews with citizenship instructors throughout the country.

Earlier in her career, Ms. Dean earned a bachelor’s degree in political science and a master’s degree in Spanish literature. She was fluent in Spanish and while working on her Ph.D. in Spanish literature, she taught Spanish language at Northern Illinois University. In 1977 in Elgin, Illinois, she began teaching English as a second language (ESL), and later developed a course that taught immigrants professional housekeeping skills. During the mid-1980s, she worked as an educational consultant for ESL and bilingual programs in the Elgin, Illinois school district. During this time, she created a Spanish literacy textbook and course that would ultimately aid immigrants’ ability to learn English.

Ms. Dean contracted poliomyelitis at age four. At age 59, Ms. Dean passed away from chronic restrictive lung disease, on Tuesday, July 19, 2005.

Ms. Dean is remembered as much for her extraordinarily positive, enthusiastic outlook on life as for her tremendous contribution to the field of citizenship education and policy. She will be dearly missed and remembered by her many friends in the adult education community. It is with respect that this report is dedicated to her memory.

About Catholic Legal Immigration Network, Inc. (CLINIC)

Catholic Legal Immigration Network, Inc. (CLINIC) advocates for transparent, fair and generous immigration policies. It represents one expression of the Catholic Church's commitment to the full membership of migrants in their chosen society. CLINIC and its member agencies serve the most vulnerable migrants, such as refugees, asylum seekers, detainees, families in need of reunification, laborers abused in the workplace, victims of domestic violence, and survivors of human trafficking.

In 1988, the United States Catholic Conference established CLINIC as a legally distinct nonprofit organization to support a rapidly growing network of community-based immigration programs. CLINIC's network originally comprised 17 programs. It has since increased to 161 programs in 255 office locations in 48 states. The network employs roughly 1,200 attorneys and accredited representatives who assist more than 400,000 immigrants each year. CLINIC and its member agencies serve low-income immigrants regardless of race, religion, gender, ethnic group, or other distinguishing characteristics.

CLINIC has great expertise in providing citizenship services, managing collaborative national and regional programs, providing training and technical assistance to local service providers, advocating for a fair and responsive immigration system, and promoting immigrant civic participation.

About the Authors

JEFF CHENOWETH began working for CLINIC in 1997 and is CLINIC's Director of National Programs. He has worked continuously in the field of non-profit immigration and refugee assistance since 1986. In that time, he has worked at the local, national, and international level. He holds a master's degree in social work from The Ohio State University.

LAURA BURDICK began working for CLINIC in 1997 and is a Senior Immigration Specialist. She has worked for local and national non-profit organizations serving immigrants and refugees since 1996. She holds a master's degree in social work from Virginia Commonwealth University.

Mr. Chenoweth and Ms. Burdick have co-authored, edited, and contributed to several other CLINIC publications, including *Citizenship for Us: A Handbook on Naturalization and Citizenship* (2006); *Immigrant-Led Organizers in Their Own Voices: Local Realities and Shared Visions* (2006); *Citizenship for Refugee Elders: Issues and Options in Test Preparation* (2000); *Citizenship at Risk: New Obstacles to Naturalization* (2000); and co-authored a journal article, *The Path to Integration: Meeting the Special Needs of Refugee Elders in Resettlement* (2001).

Methodology Used to Produce *A More Perfect Union*

Catholic Legal Immigration Network, Inc. (CLINIC) was awarded a grant from the Carnegie Corporation of New York to describe a program that could naturalize the millions of Lawful Permanent Residents eligible for citizenship, focusing on those with the greatest challenges. In October 2004, the report's authors drafted a national citizenship plan outline to guide their research and report structure. In December 2004, CLINIC invited 11 experts on immigration, naturalization, citizenship, immigrant integration, and English language acquisition and naturalization instruction to form a one-time focus group. The focus group gave the authors input on the outline and recommended other experts to form an advisory group for the research period. In addition, the focus group offered names of persons to be interviewed.

In January 2006, CLINIC formed an advisory group of 22 persons. (See "Interviewees" noting advisory group members and their affiliation.) Interviews began in January 2005 with all focus and advisory group members. Each interviewee was asked to recommend names of others to be interviewed, thereby eliciting input from persons with diverse backgrounds and perspectives.

Interviews were semi-structured, loosely following a list of questions provided to the interviewee in advance. Interviews averaged 90 minutes in length. Interview content was captured using a qualitative database to store and later code responses. Codes were applied to common responses and collected in reports for easier content analysis.

In early 2005, CLINIC invited six experts in English language acquisition and naturalization instruction to form an English as a Second Language/Naturalization Instruction Working Group. (See "Interviewees" noting Working Group members and their affiliation.) The Working Group was assigned to interview other experts in the same fields, advise CLINIC on related policy and practice issues, and co-author a chapter of the report offering recommendations to expand and improve citizenship instruction.

By June 2006, the authors, including the ESL/Naturalization Instruction Working Group members, interviewed 108 experts. Although not attributed by name or through quotations, many facts and recommendations were provided by interviewees.

On June 7, 2006, CLINIC convened the advisory group to provide input on the most important recommendations for a national citizenship program. (See Recommendations for a National Citizenship Program at the conclusion of the Executive Summary.) While broadly supported by the advisory group and interviewees, recommendations in the Executive Summary and throughout the report are the opinions of the authors and CLINIC alone.

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EXECUTIVE SUMMARY

The United States is a nation of immigrants united by a common creed and shared values. With 37 million foreign-born residents, the United States' strength and vitality depends on the contributions of its newest members. However, the integration of a population of this magnitude and diversity cannot be assumed. The pressing policy question becomes: what can be done to promote the integration of this record number of immigrants? *A More Perfect Union: A National Citizenship Plan* proposes a national program to naturalize the eight million immigrants who – based on their years as Lawful Permanent Residents (LPRs) – may qualify to naturalize, as well as the millions more who will become eligible in the near future.¹ Citizenship is a significant marker of immigrant integration and a pre-condition to full membership in our constitutional democracy. As a practical matter, naturalization involves immigrants in a range of integration activities. Yet despite its benefits, the United States does surprisingly little to promote this process. In theory, we want eligible immigrants to naturalize, but in practice we do little to encourage or assist them.

A More Perfect Union: A National Citizenship Plan sets forth the resources, activities, and partnerships that would be required to naturalize as many eligible immigrants as possible. It calls for a national mobilization in support of citizenship, identifying the roles of government, immigrant service agencies, and other sectors of society in a coordinated plan. It describes a program that could serve as the linchpin of an emerging U.S. immigrant integration strategy.

The benefits of citizenship cannot be overstated. For individuals, these include the right to vote, faster family reunification, better employment and educational opportunities, and a stronger attachment to the United States. For U.S. society, naturalization can be viewed as a benchmark of integration. Citizenship can serve as a catalyst for immigrants to become more: dedicated to democratic principles; informed about the Constitution; engaged in political elections;² represented in the political system; proficient in the English language; unified as families; employable in higher paying jobs;³ and integrated within a wider circle of people and institutions.

Most immigrants strongly value U.S. citizenship. Fully 90 percent view citizenship as something “necessary and practical” or “a dream come true.”⁴ Yet millions do not apply to naturalize when eligible. Lack of proficiency in the English language represents the most common barrier to naturalization. About 55 percent of immigrants who are otherwise eligible to naturalize and about 67 percent of immigrants who will soon be eligible have limited proficiency in English.⁵ Nationwide, there is a shortage of high quality and affordable English language classes. Government-supported language programs are operating at full capacity, and in many communities, waiting lists for English classes stretch several months. Yet these programs represent the only structured way for many low-income immigrants to learn English. Other serious barriers include ignorance of the legal requirements and benefits

of naturalization, a shortage of professional application assistance, inability to afford the application fee, and application processing problems.

The United States lacks a coherent immigrant integration policy, much less a coordinated program to promote citizenship and to prepare immigrants for naturalization. Since citizenship programs depend on short term, private funding, they tend to be sporadic and regional. Sustained federal leadership will be required to support a national program. Non-federal public and private support will also be needed. The proposed program would be implemented by existing networks of immigrant service organizations in partnership with English/citizenship instructors and an expanding circle of other sectors of society. Many pilot citizenship projects have been conducted over the past 15 years, and successful program models have been documented. There is no need for further pilots.

As part of a national citizenship program, Congress must pass better immigration laws, and the U.S. Citizenship and Immigration Services (USCIS) division of the Department of Homeland Security (DHS) will need to make regulatory changes and to improve access to the naturalization process.

The proposed program should establish measurable outcomes, including a higher naturalization rate and less disparity in outcomes by socioeconomic and nationality group. It should also be designed to build the capacity of participating community-based organizations.

Just as native and foreign-born persons join together to celebrate citizenship at naturalization oath ceremonies, the nation should celebrate when immigrants exercise their rights and assume their civic duties, whether as voters, workers, family members, or volunteers. The time for a national citizenship program has arrived. U.S. political leaders must decide whether to continue the status quo,

laissez-faire approach to naturalization or to implement an immigrant integration initiative that actively promotes citizenship. The following 18 priority recommendations were selected by a core group of 22 experts based on more than 100 interviews with immigration service and policy experts.

PRIORITY RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PLAN

Funding:

- 1 Congress should appropriate funds to the USCIS Office of Citizenship (OoC) to enable it to fulfill its mission, to support a national citizenship program, and to provide technical assistance and funding to qualified nonprofit organizations for citizenship services.
- 2 Congress should appropriate sufficient funding so that USCIS does not need to depend entirely on fee revenue to adjudicate applications. Adequate funding would allow USCIS to halt annual fee increases, reduce its backlogs, and improve the technology for application processing and its customer services. Congress should give USCIS flexible access to fee-account revenue to enable it to respond to sudden increases in applications. It should also hold USCIS accountable to maintain backlog reduction goals, upgrade its technology, and improve customer services.
- 3 Funding should be prioritized for networks of direct service providers that are engaged in all aspects of citizenship services including: outreach, intake, application assistance, English as a second language (ESL) and citizenship instruction, naturalization test and interview preparation, legal representation, post-naturalization services, and provision of civic participation opportunities. In many cases, this will require non-profit organizations to share funding and to join services. Nonprofit organizations that are engaged in application assistance should be recognized by the Board of Immigration Appeals (BIA) or supervised by an attorney. These agencies should be the preferred anchors in local collaborative programs.
- 4 A federally led program should not supplant, but should help to coordinate, increase, and sustain the citizenship work now being performed with other sources of support. State, local, philanthropic, and corporate interests should leverage federal dollars and expand the capacity of service providers, particularly for English language instruction. The OoC should track funding from these sources, state by state, and issue an annual report that publicizes citizenship funding commitments, their sufficiency, and the achievements of a national program.

Program Design and Planning:

- 5 To generate broad public awareness and support, a national citizenship program should bring together the leadership, resources, and talents of the nation's public and private sectors. Native-born, naturalized, and future citizens should be engaged in the program's design and implementation as a way to strengthen the program and to build bonds between these groups.
- 6 A national citizenship program should ensure that all LPRs have access to citizenship, regardless of their socioeconomic class or ethnic background. It should prioritize funding and services for LPRs who naturalize at the lowest rates. However, it should also assure that sufficient services be provided to those who can self-file and who need less information and assistance.
- 7 The OoC's budget should come chiefly from public funds, but its dependence on USCIS application fees should be reduced. The OoC should not seek or receive corporate or philanthropic donations. Instead, it should steer private funding to nonprofit groups by promoting naturalization and sharing successful program models. The OoC should hire community liaison officers for each USCIS district, and task them with coordinating local initiatives, conducting outreach, and building partnerships with nonprofits.
- 8 A national citizenship program should bring together academics and practitioners to identify the research and demographic data that will be needed to conduct outreach, design media campaigns, allocate funding, build service capacity, strengthen ESL and citizenship instruction, and provide benchmarks and tools for evaluation. Immigration experts should convene a privately funded national citizenship conference to share new research, knowledge, program models, and best practices.
- 9 A national citizenship program should include a methodologically sound evaluation component that documents successes and areas for improvement. Evaluation should rest on baseline data, shared modes of intervention, and coordinated data collection with a shared database. The database should maintain privacy and confidentiality, collect meaningful information, track benchmark information, and report successful outcomes. Program evaluation should document not only numbers of new citizens, but significant community interventions and steps contributing to citizenship. Protocols and technological barriers should be developed to restrict government and grantee access to confidential information.

Program Outreach, Activities, and Services:

- 10 The OoC, nonprofit service networks, and local service providers should coordinate citizenship outreach. Appropriate content should be developed by experts in media messaging and immigration services, as well as by immigrant organizers. Outreach should highlight naturalization requirements, as well as the benefits, rights, and responsibilities of citizenship. It should be designed with a consistent image and message, but be tailored to local needs and targeted populations. It should utilize naturalized citizens as spokespersons; offer true-life stories that balance emotional appeal and practical information; provide referral information; utilize multiple communication vehicles; be conducted primarily at the local level; and be evaluated for effectiveness.
- 11 USCIS should include in its approval notice for lawful permanent residence an addendum explaining citizenship eligibility requirements. It should also work with OoC to send *Welcome to the United States, A Guide for New Immigrants* to all immigrants and refugees upon their arrival. As a less costly alternative, it could distribute a multilingual flyer giving the Web link to the guide. Once an immigrant is eligible to apply for citizenship, USCIS should send him or her a reminder. If applicants fail the citizenship test, USCIS should refer them to local ESL and citizenship courses.
- 12 As part of a federally funded citizenship plan, local immigration service providers should significantly expand their provision of naturalization group processing workshops. These events should be sponsored and supervised by organizations with immigration attorneys or BIA-accredited staff, should use trained volunteers, and should follow stringent quality control standards for eligibility screening and application review.
- 13 Naturalization oath ceremonies should be the defining moment of the citizenship process and a key feature of a national citizenship program. USCIS should direct its district offices to offer same-day oath ceremonies if possible. The OoC should expand its efforts to organize and publicize high-profile naturalization ceremonies in order to raise awareness about citizenship. Ceremonies should be organized for days of national significance, such as Independence Day, Flag Day, and Citizenship Day. Court- and USCIS-administered ceremonies should be of equal solemnity and open to the public and service organizations. All oath ceremonies should conclude with voter registration. Local boards of election should oversee voter registration activities, and encourage civic organizations to provide this service.

Removing Barriers to Citizenship:

- 14 Congress should pass a law that broadens the English language waiver for elderly citizenship applicants, allowing applicants who are aged 60 or older to take the U.S. history and civics test in their native language.
- 15 ESL and citizenship instruction should be expanded through adult basic education classes and community-based organizations. Classes should be available at different English language levels, including short-term, high-impact instruction for advanced students and long-term, tailored instruction for students with low literacy. Standards should be established for both professional and volunteer instructors. Instructors should receive training and be able to refer questions and clients to immigration legal experts. Curricula should cover the naturalization test and interview, but include broader content that fosters an informed and engaged citizenry.
- 16 USCIS should expand the availability of citizenship application fee waivers for low-income immigrants. It should change its fee waiver policy to make it less discretionary; create a fee waiver application form to standardize the application process; explain the availability of waivers and the application process in its informational materials; establish an application filing discount for poor working families who wish to apply for citizenship together; and offer an option of paying the application fee in two installments.

Improving the Citizenship Test:

- 17 The revised citizenship test should: adhere to the current legal requirements for level of difficulty and use of discretion; include consequential material on U.S. history and civics presented at a basic English level; and be standardized in its delivery yet able to accommodate applicants with special needs. It should not adversely impact vulnerable applicants or those who are members of specific ethnic, national or language groups; pose legal questions from the Application for Naturalization in assessing the applicants' proficiency in English; create undue delays in the naturalization process; or impose additional costs on applicants. USCIS must provide extensive training and monitoring of its officers to ensure proper implementation of the redesigned citizenship test.
- 18 The OoC should partner with nonprofit organizations to: create a curriculum and study guide at basic and advanced English levels for use in preparing applicants for the citizenship test; create a teacher's guide that will allow teachers to receive broader and deeper instruction; create and distribute free, multimodal citizenship promotion materials; establish a clearinghouse of citizenship materials; fund training and technical assistance for ESL and citizenship teachers; and promote standards in citizenship education.

These recommendations form the basis of the more detailed analysis provided in *A More Perfect Union: A National Citizenship Plan*. If implemented, they will make an indispensable contribution to the integration of millions of would-be citizens and their families.

- 1 Passel, J.S. *Naturalization Trends, 1995-2005* (Washington, DC: Pew Hispanic Center, Forthcoming 2007).
- 2 According to the 2003 Current Population Survey, 87 percent of new citizens registered to vote in the 2000 election, slightly higher than the 85.5 percent of native-born citizens. Source: Paral, R. "Power and Potential: The Growing Electoral Clout of New Citizens" (Washington, DC: The American Immigration Law Foundation's Immigration Policy Center, October 2004).
- 3 A study of young, male naturalized immigrants in New York using 1990 Census and 1994-1998 current population surveys and data from the National Longitudinal Study of Youth reveals that naturalized immigrants earn higher wages and have better job distribution than immigrants who have not naturalized. Economic gains from citizenship appear greatest for immigrants from poorer countries. Source: Bratsberg, B., Ragan, J. F., Nasir, Z. M. "The Effect of Naturalization on Wage Growth: A Panel Study of Young Male Immigrants" *Journal of Labor Economics* 20, issue 3 (July 2002), p. 589 – 590.
- 4 Farkas, S., Duffett, A., & Johnson, J. *Now That I'm Here: What America's Immigrants Have to Say about Life in the U.S. Today* (Washington, DC: Public Agenda, 2003), p. 29.
- 5 Passel, J.S. *Naturalization Trends, 1995-2005*.

THE NEED FOR A NATIONAL CITIZENSHIP PROGRAM

The strength of a democracy can perhaps best be measured by the participation of its members. Citizenship represents a pre-condition to full participation in our constitutional democracy. Yet large numbers of immigrants in the United States fail to pursue this status. If “the ease with which immigrants become citizens reflects the quality of [a] democracy,”¹ it would behoove us to understand the factors that promote, delay, or discourage naturalization. The nation would also benefit immensely from a national program to promote citizenship. This report proposes such a program.

The Importance of U.S. Citizenship

Citizenship greatly benefits the affected individuals and U.S. society.² These benefits include:

- The right to vote and hold public office. Naturalized citizens have the right to vote in federal, state, and local elections. They also have the right to hold all elected public offices, with the exception of President and Vice President, and to serve on juries.
- The ability to sponsor family members to legally immigrate to the United States. A U.S. citizen can sponsor his or her spouse, children, parents, married adult children, and siblings, while a noncitizen Lawful Permanent Resident can only sponsor his or her spouse or children under age 18. In addition, the visa waiting periods are much shorter for a citizen’s immediate relatives.
- Derivative citizenship for children. When a parent naturalizes, his or her Lawful Permanent Resident children who are under age 18 automatically become U.S. citizens, provided they meet certain eligibility requirements.
- Increased access to employment and educational scholarships. Certain jobs, particularly government-related jobs, are restricted to U.S. citizens. Some educational scholarships are also restricted to U.S. citizens.
- The ability to travel on a U.S. passport. Citizens are protected by the U.S. embassy when traveling abroad, and can leave and re-enter the United States without restrictions. Noncitizens can be barred from re-entering the United States, or can lose their permanent resident status if they remain outside the United States too long.

- Protection from deportation. Citizens cannot be deported from the United States, even if are convicted of a crime. Noncitizens, even Lawful Permanent Residents with minor criminal convictions who have lived in the United States for years, can be removed from the country.
- Preservation of public benefits. Citizens can access public benefits such as Supplemental Security Income, Medicaid, and food stamps without being subject to the limitations placed on noncitizens. U.S. citizens also have full access to Social Security benefits when living abroad, while noncitizens do not.

The desire for one or more of these benefits induces many immigrants to apply for naturalization. Immigrants also are influenced by less tangible factors, such as identification with the United States, and family or community ties. A significant increase in naturalization applications followed September 11, 2001. Many immigrants who were interviewed about their reasons for applying expressed strong feelings of attachment to the United States. One person said: “That day I realized this is my country. It’s like they did something to me that day. I realized I am an American.”³ Anecdotal evidence suggests that once one family member becomes a U.S. citizen, other family members are more likely to apply.

Naturalization rates can be viewed as a benchmark of immigrant integration. Citizenship can serve as a catalyst to making the foreign-born more: dedicated to democratic principles, informed about the Constitution, engaged in political elections,⁴ represented in the political system, proficient in the English language, employable in higher paying jobs,⁵ and integrated within a wider circle of people and institutions.

It should be a point of national pride when immigrants exercise the rights and assume the duties of citizenship. As Professor Irene Bloemraad writes, “Citizenship is a legal status that accords rights and benefits, but it is also an invitation to participate in a system of mutual governance

and it can be an identity that provides a sense of belonging. When residents of a country do not acquire citizenship, or fail to participate in the political system, not only is the sense of shared enterprise undermined, but so, too, are the institutions of democratic government.”⁶

A Plan for a National Citizenship Program

A More Perfect Union: A National Citizenship Plan identifies how to increase naturalization rates and sustain them. It details how to expand services to immigrant groups that need minor assistance, as well as those with special needs.

Definition of Citizenship

The word “citizenship” can refer to either the legal status achieved through birth or naturalization, or to attachment and loyalty to a nation. This report primarily uses “citizenship” in the former sense. However, it occasionally adopts its patriotic meaning, and sees citizenship in this sense as an important goal of a national citizenship program.

What a National Citizenship Plan Can Achieve

The national citizenship plan seeks to: 1) garner support from federal officials for immigrant integration and to secure a federally-funded program; 2) serve as the linchpin of a U.S. immigrant integration policy; 3) forge stronger relationships between federal, state, and local governments in partnership with the private sector; 4) increase the naturalization rate for immigrants who are currently eligible to naturalize and for those who will be eligible; 5) serve as a catalyst for expanded support for English as a second language (ESL) classroom instruction; 6) deepen immigrants’ knowledge of U.S. history and civics; 7) increase voter participation and broaden civic engagement opportunities; and 8) build stronger social bonds between native- and foreign-born people through the shared experiences of helping, or being helped, in the naturalization process.

What a National Citizenship Plan Does Not Attempt to Achieve

The plan does not seek to: 1) offer just one model for a national citizenship program; 2) supplant current citizenship programs; 3) lend support to a select group of organizations; 4) offer a citizenship plan as a comprehensive policy for immigrant integration; 5) espouse narrow expectations of immigrant patriotic behavior; 6) coerce immigrants into applying for citizenship or disparage those who do not.

None of the 108 persons interviewed for this plan questioned the U.S. policy of granting citizenship based on birth in the United States. Nor does this report. Only a few expressed concern over dual citizenship. When asked about citizenship and immigrant integration, interviewees from a broad political and professional spectrum focused more on immigrants’ attachment to the principles of the U.S. Constitution and their willingness to participate fully in U.S. society.

Paving the Path to Citizenship

The national citizenship plan views all immigrants as on the “path to citizenship.” The plan focuses on two distinct immigrant groups, those without barriers to citizenship and the compelling minority with significant barriers.

Of the millions of immigrants currently eligible for citizenship, the majority will be able to file applications with minimal direction and assistance. The pertinent question is *when* they will naturalize, absent a “grand invitation.” This group needs to receive a clear message about citizenship’s benefits, as well as answers to questions that cause them to delay applying. The plan calls for a comprehensive citizenship outreach campaign to this population. (See Chapter 11 on marketing and outreach.)

To further promote citizenship and help the majority of self-filers, the plan also calls for the development of a self-study curriculum for high-level learners. The curriculum should be free, easily accessible, and produced for print and electronic media. It should contain more meaningful content than the information required to pass the current naturalization test and should inspire immigrants to learn more about the United States over their lifetimes. (See Chapter 7 for recommendations.)

The national citizenship plan largely focuses on those immigrants with significant barriers to eligibility and to the application process, particularly the poor and those who speak limited English. Increasing the naturalization rates for these groups would be an exemplary accomplishment for the United States and a model for other nations.

The Desire of Immigrants to Become U.S. Citizens

A large majority of immigrants want to become citizens. The question is what will prompt them pursue this goal. Ideally, citizenship should stem from patriotic attachment and a desire for political enfranchisement. However, most dramatic increases in naturalization have resulted from fear of the harsh consequences of anti-immigrant legislation.⁷

Although considerable data exists on immigrant demographics, naturalization rates and naturalization indicators, there is less data on immigrant attitudes towards citizenship. However, three studies offer a snapshot of how immigrants view naturalization.

A 2003 report titled *Now That I'm Here: What America's Immigrants Have to Say about Life in the U.S. Today*, written by Public Agenda for the Carnegie Corporation of New York, presents the views and attitudes of immigrants about living in the United States. Respondents were randomly sampled shortly after the terrorist attacks on September 11, 2001, about their integration into U.S. life. In addition to questions about social relations, political environment, learning English, and work, immigrants were asked about their expectations to become citizens. The survey found that 93 percent planned to pursue citizenship. Immigrants were asked how best to describe what becoming a U.S. citizen meant to them. Fifty-six percent stated it was a necessary and practical matter, 34 percent a dream come true, 8 percent something not so important, and 2 percent had no response.⁸

A 2005 report, *New Americans Survey Frequencies*, prepared by the Chicago Information Center for the Illinois Coalition for Immigrant and Refugee Rights, used intercept surveys in immigrant-impacted neighborhoods, snowball sampling (referrals from one immigrant to another), and convenience sampling (distribution of surveys through conduits to immigrants, such as social service agencies and employers). Immigrants were asked, "Do you expect to apply for citizenship?" Of the 481 respondents, 64 percent answered, "I definitely will." Another 27.2 percent responded, "Maybe I will or not sure." Only 8.7 percent said, "I think I will not."⁹

The third study summarizes data collected by the New Immigrant Survey (NIS), a longitudinal study of representative, new legal immigrants and their children. A pilot survey conducted in 1996 asked immigrants 18 years and older, "Do you plan to become a U.S. citizen in the next 10 years?" Responses were separated by four visa classes. Positive responses in rank order were: 98 percent from diversity visa holders, 78 percent from spouses of U.S. citizens, 75 percent from "other" visa holders, and 60 percent from employment visa holders.¹⁰

Characteristics of Immigrants Who Naturalize¹¹

- As immigrants' level of English proficiency increases, so does their likelihood of becoming naturalized citizens.
- As immigrants' level of education increases, the odds of acquiring citizenship also increase up to completion of high school; after that point, an additional year of schooling begins to reduce the odds of naturalization.
- Immigrants who are homeowners are about 1.3 times as likely to naturalize as those who are not.
- Immigrants who are married or were married are 18 percent more likely to become citizens than those who were never married. Having minor children further encourages naturalization.
- The odds of acquiring citizenship increase as age at the time of immigration rises, reaching a peak at age 39, and then descending.
- Men are about 10 percent less likely to naturalize than women.
- Immigrants from refugee-sending countries are nearly 15 percent more likely to naturalize than those not from such countries.
- Coming from an English-speaking country reduces the odds of naturalization by about 27 percent.
- The odds of naturalization for immigrants from countries that recognize dual citizenship are about 20 percent less than the odds for those from countries that do not.

Lawful Permanent Residents Currently Eligible to Become U.S. Citizens

As illustrated by Figure 1 (see page 4), a considerable number of immigrants currently eligible and soon to be eligible for naturalization face challenges in the areas of English language ability, formal education, and income, especially when compared to the recently naturalized. This data was an impetus for this report and the concept of a national citizenship plan.

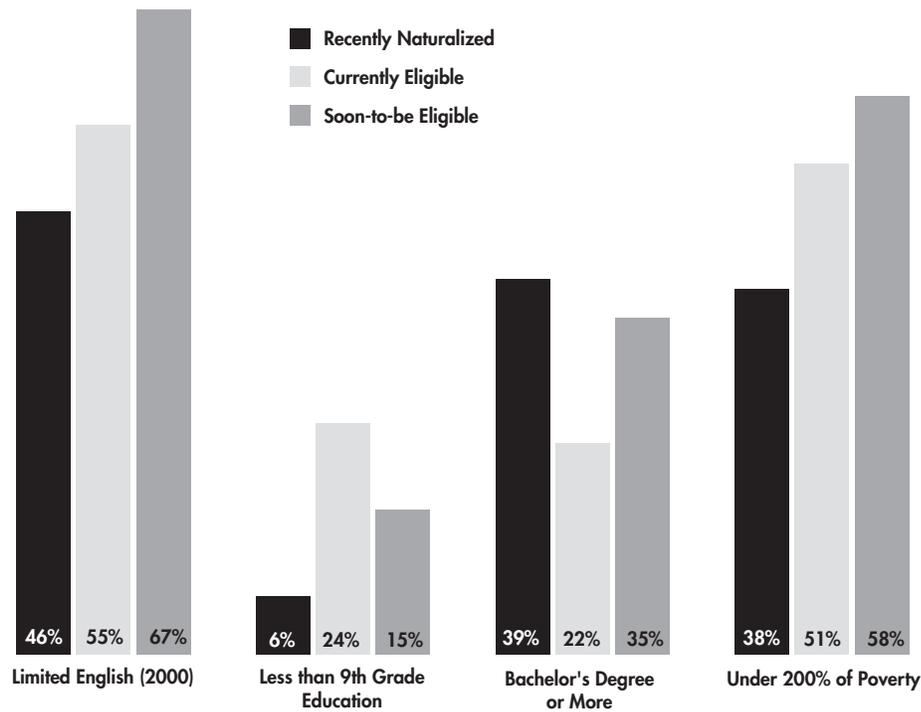


Figure 1. Selected Characteristics of Immigrant Citizenship Groups, 2005.

Source for Education and Income Data: Pew Hispanic Center tabulations of supplement to the March 2005 Current Population Survey with legal status assignments and adjustments for omissions.
 Source for English Language Data: Pew Hispanic Center tabulations of Census 2000 5% Public-Use Microdata Sample (PUMS) with legal status assignments and adjustments for omissions.
 Limited English Definition: Speaks a language other than English at home and does not speak English “very well.”

Patterns of Naturalization

Patterns of naturalization should concern all Americans, but particularly federal policymakers and immigrant advocacy organizations. Even though naturalization rates rose in the 1990s, the trend cannot be expected to continue indefinitely. A confluence of events prompted for the increase, including: response to anti-immigrant legislation (Proposition 187 in California and the Personal Responsibility and Work Opportunity Reconciliation Act of 1996); an increase in the number of persons eligible to naturalize, including persons legalized under the 1986 Immigration Reform and Control Act; the rising cost of replacing a green card for Lawful Permanent Residents; and Mexico’s easing of dual citizenship restrictions.¹² As these events suggest, naturalization increases cannot be assumed or predicted absent a national citizenship program.¹³

At present, the U.S. immigrant population can be roughly divided into three categories: one-third naturalized citizens,¹⁴ one-third Lawful Permanent Residents (green card holders),¹⁵ and one-third undocumented.¹⁶ These proportions will shift over time, particularly if Congress passes legislation to legalize the undocumented.

The number of immigrants eligible to become citizens (eight million) and soon to be eligible (2.7 million) are at historically high levels.¹⁷ Of the currently eligible, about three-quarters live in six states (California, New York, Texas, Florida, New Jersey and Illinois) and one-third lived

in California alone.¹⁸ (See Table 1 on page 5.) In Texas, there are more eligible immigrants than naturalized citizens. In 2002, roughly 12 percent of those who were eligible lived in 22 “new” immigrant growth states and 13 percent lived in 23 states with relatively slower growth.¹⁹

Citizenship status and an engaged citizenry are particularly important given the volume and diversity of the foreign-born. The United States is not well-served by disparities in naturalization rates that turn on nationality, residence by state, religion, income, education or English literacy levels.

Requirements for Becoming a U.S. Citizen

Immigrants must meet certain eligibility requirements for naturalization. They must be at least 18 years old; have five years of lawful permanent residence (three years if they have a U.S. citizen spouse); have good moral character; be able to read, write, and speak basic English; pass a test on U.S. history and government; and take an oath of allegiance. Certain waivers of the English language and civics requirements are available for applicants based on disabilities, age, and length of lawful permanent residence. In addition, a waiver of the oath of allegiance is available for applicants with severe disabilities. There are also waivers of the residency requirement for certain categories of applicants, such as U.S. military personnel.

Table 1.
Naturalization Status of Legal Permanent Foreign-Born Adult Residents by State:
March CPS 2005 (Populations in thousands)²⁰

State or Area	Naturalized	Eligible to Naturalize	Soon-to-be Eligible*	% Natz. of Eligible	State or Area	Naturalized	Eligible to Naturalize	Soon-to-be Eligible*	% Natz. of Eligible
Total	12,361	8,482	2,758	59%	North Dakota	2	3	3	31%
"Big Six"	8,605	6,212	1,877	58%	South Dakota	4	5	4	43%
California	3,477	2,945	736	54%	Nebraska	18	22	8	45%
New York	1,937	932	361	68%	Kansas	33	35	5	48%
Texas	739	834	260	47%	Delaware	19	10	7	64%
Florida	1,268	756	275	63%	Maryland	274	114	61	71%
New Jersey	671	396	131	63%	DC	20	20	10	50%
Illinois	512	350	114	59%	Virginia	220	121	44	65%
Rest of Country	3,756	2,270	881	62%	West Virginia	3	3	1	53%
New England	646	346	114	65%	North Carolina	114	90	64	56%
Mid-Atlantic (->VA)	735	346	164	68%	South Carolina	33	39	0	46%
Southeast	493	353	199	58%	Georgia	174	97	63	64%
Mid-West	672	332	148	67%	Florida	1,268	756	275	63%
Plains	179	155	47	54%	Kentucky	25	22	21	54%
Mountain	566	438	136	56%	Tennessee	40	38	23	51%
Pacific	465	301	71	61%	Alabama	18	13	10	58%
Maine	20	7	2	74%	Mississippi	8	16	5	35%
New Hampshire	22	12	4	65%	Arkansas	20	10	5	67%
Vermont	9	4	0	68%	Louisiana	61	27	7	69%
Massachusetts	366	212	80	63%	Oklahoma	53	23	10	69%
Rhode Island	55	32	11	63%	Texas	739	834	260	47%
Connecticut	175	79	16	69%	Montana	2	4	0	36%
New York	1,937	932	361	68%	Idaho	17	26	7	40%
New Jersey	671	396	131	63%	Wyoming	3	1	0	75%
Pennsylvania	198	78	42	72%	Colorado	103	83	20	55%
Ohio	167	44	31	79%	New Mexico	46	41	22	53%
Indiana	73	22	16	77%	Arizona	226	173	48	57%
Illinois	512	350	114	59%	Utah	39	34	14	53%
Michigan	232	135	45	63%	Nevada	130	76	25	63%
Wisconsin	70	59	10	54%	Washington	225	167	40	57%
Minnesota	130	73	45	64%	Oregon	98	70	17	58%
Iowa	27	32	9	46%	California	3,477	2,945	736	54%
Missouri	44	35	9	56%	Alaska	22	10	4	69%
					Hawaii	120	54	11	69%

SOURCE: Pew Hispanic Center tabulations of March Supplement to the Current Population Survey with corrections for misreporting of citizenship (1995, 2005) and adjustment for CPS omissions (2005 only).

AREA DEFINITIONS: Groups of states do not correspond to Census divisions; state groups are:

New England	ME, NH, VT, MA, RI, CT	Plains	IA, MO, ND, SD, NE, KS, OK
Mid-Atlantic (->VA)	PA, DE, MD, DC, VA, WV	Mountain	MT, ID, WY, CO, NM, AZ, UT, NV
Southeast	NC, SC, GA, KY, TN, AL, MS, AR, LA	Pacific	WA, OR, AK, HI
Mid-West	OH, IN, MI, WI, MN		

Challenges to Becoming a U.S. Citizen: The Decision to Apply

Many immigrants are unaware of the benefits of citizenship, eligibility requirements, or how the naturalization process works. They have never been educated about citizenship or encouraged to apply. For those who wish to naturalize, accurate information can be hard to find. Community outreach is seldom funded. As a result, immigrants resort to word of mouth and hearsay to determine their potential eligibility. While the U.S. Citizenship and Immigration Services (USCIS) provides helpful information on its website, many low-income immigrants either do not know how to use the Internet or do not have easy access to it.

Furthermore, many immigrants mistrust government agencies due to corruption in their native countries and negative experiences with U.S. immigration authorities. Immigrants also fear exposing undocumented family members to immigration authorities by applying for citizenship. Fear of the citizenship interview, especially the test, also inhibits some immigrants from applying.

Once immigrants decide to apply for citizenship, there are further barriers. Many require help in completing the application, which is lengthy and complex. Immigrants who must work long hours and care for their families often find it difficult to complete the application and assemble all the required documentation.

Because the consequences of submitting an inaccurate or incomplete application can be severe, it is advisable to obtain professional assistance in completing the application. However, many immigrant communities lack competent and affordable immigration assistance. Low-income immigrants who cannot afford a private attorney's fees may seek help from family members or friends with no knowledge of immigration law, or they may pay a *notario*, a person in the community who practices immigration law without proper training or authorization.

The high application fee of \$400 poses another barrier, and USCIS recently announced plans to increase the fee substantially in fiscal year 2007. Many immigrants work in low-wage jobs and have tight monthly budgets and little discretionary income. The Pew Hispanic Center found that 51 percent of immigrants eligible to naturalize have incomes under 200 percent of the poverty level.²¹ (See Figure 1.) Although fee waivers are available, they remain discretionary and are granted unevenly by different USCIS offices. USCIS policy requires careful, detailed documentation of household income and expenses to justify the need for a fee waiver. Without professional assistance, the correct documentation is often missing or incomplete.

Some immigrants come from countries that do not allow dual citizenship. In these cases, obtaining U.S. citizenship would mean losing their family home or land. Although the United States does not recognize dual citizenship, it does not expressly prohibit it. Thus, dual citizenship is possible for immigrants whose native countries allow it. In recent years, more countries, including Mexico, have officially permitted dual citizenship and passed laws allowing dual citizens to keep their property. Thus, the issue of losing one's native citizenship is less of a concern for would-be U.S. citizens than in the past.

To address the challenges described, the national citizenship plan would seek to: (1) expand public outreach on the benefits and requirements of citizenship in venues other than the Internet; (2) broaden USCIS's citizenship outreach efforts in immigrant communities; (3) increase funding for non-profit organizations providing application assistance and immigration counseling for low-income immigrants; (4) cap the citizenship application fee; (5) expand the availability of fee waivers, and; (6) increase the availability of naturalization group application workshops.

Challenges to Becoming a U.S. Citizen: The English Requirement

Based on the 2000 census, almost 14 million working-age adults in the United States, mostly immigrants, speak English "less than very well." The majority are of Mexican nationality (56 percent), have completed less than nine years of education (50 percent), and are the parents of minor children who speak English well, some as a first language (62 percent).²² Although other minorities have improved their English literacy skills in the past decade, English literacy among Hispanics has declined. In 1992, 35 percent of Hispanics were identified as having below basic English reading and speaking skills. This figure increased to 44 percent in 2003.²³

Many immigrants who are otherwise eligible for citizenship lack the English language skills necessary for the citizenship test. The law requires applicants to read, write, and speak basic English. A non-random survey of over 500 immigrants in Chicago found that 40 percent could "just barely get by" in English or could not "manage without an interpreter."²⁴ According to the Pew Hispanic Center, roughly 55 percent of immigrants who are eligible to naturalize and about 67 percent who will soon be eligible have limited proficiency in English.²⁵ It is not known how many of these immigrants could pass the citizenship test. The USCIS has reported anecdotally that a majority of its denials are due to lack of English.

In October 2005 the USCIS Office of Citizenship commissioned a study by the American Institutes for Research (AIR) to document the pass rates for the current citizenship test. A sample of 3,074 naturalization records revealed that 84 percent of applicants passed the citizenship test on the first attempt and 93 percent passed the test on a subsequent attempt, either on the same application or a later application.²⁶ Only 71 percent of elderly applicants 65 years and older passed the English portion of the test on the second attempt.²⁷ Applicants from the Caribbean and Central America had the lowest English pass rates for the first test, 82.5 percent and 81.4 percent respectively.²⁸ By country of origin, applicants from the Dominican Republic, Iran, Mexico, and Vietnam had the lowest pass rates (between 69.9 percent and 75.4 percent).²⁹ These rates improved to between 90.7 percent and 93.6 percent after the last attempt on the test.³⁰ Since persons with the greatest challenges are more likely to seek representation, pass rates were lower for applicants who had application assistance or legal representation.³¹ Refugees had a significantly lower pass rate for the first attempt in comparison to applicants with other types of immigration status, 77 percent compared to 86 percent.³²

As suggested by these statistics, the English requirement is particularly challenging for immigrants with low levels of education in their native countries, especially those who are illiterate in their native language. Low levels of education and literacy are sometimes compounded by advanced age. For these groups, learning to read and write English can seem like an insurmountable challenge. ESL instructors estimate that it can take many years to prepare them for the citizenship test. An exemption from the English language requirement is available for immigrants meeting certain age and long-term residency requirements, but this does not cover immigrants who arrived in the United States at an advanced age and who often need an exemption the most. For example, a person who arrived in the United States at age 75 and wished to apply for citizenship at age 80 would not qualify for the English language exemption until age 90.

Interviewees for this report consistently stressed the importance of a legislative change to expand the English language waiver for the citizenship test. The current law allows an English waiver for eligible applicants who are 55 years of age or older with 15 years as a Lawful Permanent Resident and 50 years of age or older with 20 years as a Lawful Permanent Resident. A simpler alternative would be to broaden the English waiver to citizenship applicants age 60 years or older without respect to their years of residency. This alternative would allow them to take the U.S. history and civics test in their native languages.

Limited English skills coupled with low income and lack of formal education pose hardships not only for naturalization, but for integration overall. A 2002 study by the Urban

Institute found that immigrant families with limited English proficiency “are more than twice as likely to be poor as English proficient households.”³³ The hardship is perhaps greatest for those families in which the parents speak little or no English but whose children are English proficient and have minimal skills in the parents’ native language: “In addition to eroding family strengths, limited English proficiency can isolate immigrant families from the larger community, preventing them from interacting with American-born neighbors, engaging in civic life, and becoming integrated into their new community.”³⁴

The Need for Expanded English as a Second Language and Citizenship Instruction

Immigrants who want to learn English face considerable barriers, including a dearth of high quality, affordable, and accessible classes. Government-supported language programs are operating at full capacity, and many immigrant-impacted communities have a waiting list for English classes that stretches several months. Low-income immigrants, who cannot afford the high cost of private language institutes, depend on these programs. Another problem is that classes are not always scheduled at convenient times, making attendance difficult for immigrants who work long hours and support families. In addition, few English programs provide childcare, which is a major barrier for mothers with small children who wish to attend classes. Finding a class location that is convenient to where immigrants live, especially if they depend on public transportation, is also a challenge. These issues and more are expected to be addressed by the independent National Commission on Adult Literacy established in October, 2006 led by the Council for the Advancement of Adult Literacy.

Immigrants consistently express their desire to learn English through formal language instruction. English instruction is the fastest growing component of adult education in the country. Of the 3.6 million adults who participated in federally funded adult education programs in 1999, 47 percent received English language instruction.³⁵ A survey of over 500 immigrants in New York City showed that nearly 90 percent wanted to learn English.³⁶ The majority expressed a desire to attend classes at night or on weekends, yet only six percent of the New York City Adult Literacy Initiative’s classes were provided on weekends.³⁷

Federal and state funding for English classes is inadequate to meet the need. In the New York metropolitan area, there are over one million people who do not speak English well or at all, and the supply of English classes is far below the demand. One study of 184 ESL providers reported 57.4 percent having a waiting list with waiting times ranging

widely between several weeks to more than three years.³⁸ Another study suggests that the availability of classes in the New York area actually decreased as immigration increased in the 1990's.³⁹ "In 2005, the Massachusetts Department of Education reported that more than 18,000 residents were on waiting lists for ESL classes; the average wait is six months to two years."⁴⁰

Since the country's diverse and non-English speaking immigrant population is expected to grow, the disconnect between English language need and instruction capacity must be addressed. More English classes and a larger corps of ESL instructors who are specially trained to teach adult learners are needed, especially if Congress passes legislation to legalize the undocumented. Limited funding for English language classes represents a major barrier to integration. Immigrants want to learn English, but too many cannot access formal instruction.

The national citizenship plan addresses the need to assist immigrants who have limited English proficiency by expanding funding and instruction for ESL and citizenship education. There is scant need for additional pilot projects given the demand for services and the expertise already accrued. Models of quality ESL and civics⁴¹ instruction and ESL and citizenship instruction⁴² are well-documented. (See Chapter 7 on ESL and citizenship instruction.) The question is whether good models will be given the resources necessary for replication where the need is greatest.

Challenges to Becoming a U.S. Citizen: The Naturalization Process

The naturalization process can be imposing and complex. While most immigrants experience few problems or only minor inconveniences, others encounter considerable hardships. Difficulties arise, for example, when the USCIS improperly rejects a fee waiver application, misplaces a citizenship application, fails to mail notices for appointments to the correct address, sends files to the wrong office, delays appointments due to security check backlogs, or improperly rejects a disability waiver application. (See Chapter 4 on barriers in the naturalization application process.)

The success of a national citizenship plan will require, in part, significant improvements by USCIS in the naturalization process. The federal government has improved customer service and application-processing backlogs since 1997 when 1.7 million naturalization applications were pending and the wait for citizenship averaged two years.⁴³ Nonetheless, improvements have been slow and inconsistently implemented by USCIS district offices and applica-

tion-processing problems from the 1990's persist.⁴⁴ FBI security checks delay interviews and oath ceremonies by a year or more for some applicants.

The President and Congress must work to improve the naturalization process. (See Chapter 11 for a list of recommendations for the President and Congress.) In addition, USCIS must be given the tools and resources to improve services to its customers. (See Chapter 11 listing recommendations for USCIS.)

An Immigrant Integration Policy from a Citizenship Perspective

In June 2006 President George W. Bush announced a plan "to create a 'task force on new Americans' to expand local initiatives to help immigrants integrate into American society."⁴⁵ The national citizenship plan would contribute to immigrant integration and strengthen the nation. However, many questions remain concerning immigrant integration. Are conditions more favorable for integration today than in times past? Do immigrants share commonly held civic values of U.S. society? What reasons do immigrants give for wanting to be citizens? What policies maximize integration? What sectors of society create opportunities for immigrant learning and engagement? What models of integration or community development work best to empower people?

Integration is a highly complex social process. Policies and practices involving integration must be equally sophisticated. First, integration needs to be better defined, differentiating between broad social characteristics and specific civic beliefs and activities.

Second, integration must be viewed from a longitudinal perspective that accounts for changes occurring over one, two, and three generations.

Third, social integration needs to be understood as a multidirectional process among many peoples and groups rather than as a one-way, majority-dominated process or a two-way process between the majority and a single immigrant group. Immigrants live in increasingly diverse communities and interact with multiple cultures on a daily basis. Thus, social integration cannot reflect a "one form fits all" approach.

Fourth, integration should be analyzed foremost at the micro level where citizens gather to solve problems, identify common interests, and engage in preferred activities. The task of identifying local citizens' associations committed to community building is essential to implementing immigrant integration policies. President Bush's cabinet-level task force on new Americans is a good start, but it must elicit local input and involvement. In light of

continuing budget constraints for domestic programs, it is unlikely that significant new federal monies will soon be forthcoming for an immigrant integration initiative.

Fifth, a national immigrant integration policy should remove obstacles to integration and create new opportunities for civic engagement. A national immigrant integration policy should avoid charged rhetoric on the perceived needs and problems associated with immigrants, particularly ethnic minorities and poor populations.

Sixth, an immigrant integration policy should use a community development, assets-based approach that focuses on immigrant community strengths and potential. The assets-based approach “leads toward the development of policies and activities based on the capacities, skills, and assets of lower income people and their neighborhoods.”⁴⁶ An integration policy should avoid a needs- or deficit-based approach, which focuses on problems. This approach is likely to produce anti-immigrant rhetoric, divide communities, and yield disappointing results.

An assets-based approach does not ignore deficits or socioeconomic disparities among people. Instead, it affirms a basic truth about the “giftedness” of every individual. Civic associations can be included in this inventory of community assets.⁴⁷ An assets-based approach to integration would: list immigrant-identified assets in the community; chart long-term integration benchmarks embraced by new immigrants and the public; work to eliminate structural barriers to naturalization; and support initiatives that have achievable outcomes. Naturalization assistance, including English and citizenship instruction, is an integration objective with clear outcomes. It does not depend on subjective expectations about immigrant thinking or behavior.

A More Perfect Union supports the creation of a formal immigrant integration policy whose cornerstone would be a national citizenship program. In the naturalization process, immigrants satisfy many of the indicia of integration, including English proficiency, knowledge of U.S. history and civics, and allegiance to the nation. The process ultimately allows immigrants to assume the full rights and responsibilities of citizenship. This report affirms the importance of being a U.S. citizen and using this status to its fullest potential.

A National Citizenship Program Leading an Immigrant Integration Policy

The United States has a storied but inconsistent history of welcoming immigrants. As we assess the country’s immigration needs, it is helpful to consider the country’s periodic shifts from inclusiveness to exclusivity. Reflecting this “high and low tide” approach to immigration is the country’s absence of a coherent immigrant integration policy that addresses the social needs of immigrants and receiving communities. Although citizenship is regarded as a high achievement of integration, there is no well-identified policy and system to promote citizenship, inform immigrants about the rights and responsibilities of citizenship, prepare them to naturalize, or assist them through this process. There is also a shortage of English and citizenship classes. In the words of one immigration policy expert, “We as a nation don’t even send eligible immigrants a postcard telling them it’s time to apply for citizenship. Yet we complain, often angrily, that they don’t want to assimilate. Maybe—just maybe—we ought to be doing something about it? Encouraging citizenship would be one of the most useful things we could do to spur assimilation.”⁴⁸

The federal government in recent years has initiated various citizenship programs. Yet these have been sporadic and short-lived. One large federal citizenship initiative ended abruptly under a cloud of political suspicion and allegations of improper conduct. Subsequent federally funded programs were narrowly focused on immigrants who were at risk of losing public benefits under the 1996 welfare reform law.

The U.S. government has taken a laissez-faire approach to naturalization, making it entirely the immigrants’ responsibility. For example, by not providing USCIS with regular, annual appropriations, Congress essentially requires the USCIS to fully fund its budget for processing naturalization applications—and the separate budget of the Office of Citizenship—with immigrant application fees.

In the absence of a significant federal commitment to citizenship, states and philanthropic foundations have funded charitable agencies to provide naturalization services. These monies have been essential. However, state and philanthropic funds are limited compared to potential federal resources and have been available only sporadically. (See Chapter 10 for eight program models that sought to naturalize immigrants on a large scale.) A national citizenship program would make a strong statement that immigrant integration and citizenship cannot be left to chance, to immigrants, to charities, or to local governments and foundations alone.

In decades past, citizenship programs depended on active partnerships between federal and state governments and private organizations, nationally and locally. Many sectors of society were instrumental in receiving new arrivals; introducing them to housing, schooling, and work; and helping them learn English and become U.S. citizens. These sectors included city governments, schools, voluntary associations, religious institutions, employers, unions, and others. Today, these sectors and many others will play a critical role in building a national citizenship program. (See Chapter 11 for a description of sectors and recommendations for each.)

Historical Efforts to Naturalize Immigrants

The so-called “Americanization” movement took place in the early twentieth century at a time of heated social debates between right- and left-leaning Progressives and nativist political organizations, each attempting to respond to the era’s rapid demographic, sociological, and technological changes.

This movement attempted to address record-high immigration and lower than desirable naturalization rates. Large-scale efforts to naturalize immigrants were first implemented following a speech given by President Woodrow Wilson in December 1914 at a naturalization oath ceremony. Wilson spoke against ethnic groups perpetuating their foreign identities and cultural habits, urging immigrants to view themselves as members of a new nation. The “Americanization” movement sought to de-emphasize the different cultural habits and languages of the historically high number of immigrants arriving mostly from Europe and Asia and to emphasize assimilation into the dominant American culture. It expected immigrants to become U.S. citizens as soon as they were eligible. The onset of World War I deepened fears that immigrants from Europe might harbor allegiances counter to the United States.⁴⁹

The “Americanization” movement’s activities consisted chiefly of political speeches and lectures at workplaces and public schools. The agency in charge, the Federal Bureau of Naturalization, distributed notices and information directly to immigrants. It also distributed citizenship instruction materials via a nationwide network of citizenship programs, operated mostly by nongovernmental agencies, including YMCAs and YWCAs, international institutes, settlement houses, places of worship, adult education classes, neighborhood associations, women’s associations, male fraternities, and labor unions. Efforts were made to educate immigrants in English and teach U.S. history, civics, and social customs. By the 1920s, roughly 750 localities were offering programs that ultimately served one million immigrants.⁵⁰ This public-private initiative aimed to assist immi-

grants not only with the mechanics of the naturalization process but also attempted to instill allegiance to the Constitution and democratic principles.

The naturalization component of the “Americanization” movement produced public information materials, new public and private channels for their distribution, and expanded programs to help immigrants achieve citizenship.⁵¹

The movement eventually became harshly coercive, even xenophobic.⁵² Critics argued that the movement was rooted in a short-sighted and discriminatory view that immigrants were slow, if not unwilling, to become Americans, adopt democratic values, and naturalize.⁵³

Some proponents of immigration and immigrant integration activities adopted a different approach that did not seek to subvert the cultural, linguistic, and religious identity of newcomers. Instead, these reformers emphasized the need for shared values. John Dewey was a leading proponent among Progressives urging “like-mindedness” among native- and foreign-born Americans on principles of democracy and building community bonds.⁵⁴ An ally of Dewey’s was Jane Addams, a social worker who created the settlement house model in the late nineteenth century and spawned a national movement of integration services for immigrant resettlement. She decried derogatory statements and coercive acts that sought to force assimilation and to place people into citizenship classes.⁵⁵ Another distinguished figure of the era, Frances Kellor, dedicated herself to private and public service helping immigrants. Believing immigrants could Americanize without the use of harsh or forceful measures, Kellor pursued practical policies to expand government services for new arrivals and improve the appalling living conditions that she saw as an affront to the well-being and dignity of every American.⁵⁶

The years of the “Americanization” movement were characterized by rapid social change, passionate debates, new laws and agencies, and new private institutions and partnerships. The United States today faces similar challenges, and could benefit from the lessons of that earlier movement. The U.S. Commission on Immigration Reform called “for the Americanization of new immigrants, that is the cultivation of a shared commitment to the American values of liberty, democracy and equal opportunity.”⁵⁷ Among other lessons, the government should strengthen, rather than ignore or supplant, private institutions that help immigrants integrate and become citizens.⁵⁸ (See Chapter 11 for a list of recommendations for future research about immigrant integration and naturalization.)

Recent Naturalization Efforts

The federal government has done little in recent decades to promote citizenship and provide naturalization services. To the contrary, immigrants face even more hurdles in the naturalization process, including application fees that have tripled since 1998 and waiting periods of two years or more during the past decade. Notwithstanding some of the criticisms of the “Americanization” movement, the United States today falls short of its best efforts 100 years ago to help immigrants become citizens. For example, the federal government has no storehouse of free materials on how to teach English and civics for the citizenship test and no monies for public and private partnerships to raise awareness about citizenship and provide naturalization assistance. Because there is no comprehensive federal citizenship initiative, state governments and philanthropic foundations have funded charitable organization to carry out state-specific and private initiatives.

The most comprehensive citizenship program in recent years was created by the philanthropist George Soros. Offended that hundreds of thousands of immigrants were facing a loss of public benefits due to welfare reform legislation, Soros donated \$50 million of his personal wealth to his foundation, the Open Society Institute (OSI). OSI used the funds to create a citizenship initiative called the Emma Lazarus Fund. The Fund distributed most of its monies in 1997-1999 to nonprofit organizations that assisted immigrants. As a result of the passage of punitive laws and the Emma Lazarus Fund’s work, naturalization applications soared. In addition, advocacy efforts supported by the Fund led to passage of legislation at the federal and state levels that ameliorated some the harshest aspects of the welfare reform law. (See Chapter 10 for details on the Emma Lazarus Fund.)

The Fund was successful in increasing the number of new citizens and in its political advocacy on welfare reform. By the end of its two-year period, it had assisted more than 500,000 immigrants to begin the naturalization process.⁵⁹ Grant recipients raised significant matching dollars. Many Fund grantees have continued to offer citizenship programs, but on a more modest scale because of the lack of federal and private funding. (See Chapter 10 for details of other recent and current initiatives.)

The Emma Lazarus Fund effectively ended its support for naturalization services in 2000. Despite its successes, the Fund did not spur Congress to create a national citizenship program. Nor did it succeed in convincing Congress to push for the reforms needed to reduce application-processing backlogs or to make the naturalization process more accessible.

The positive experiences of the Emma Lazarus Fund should inspire U.S. political leaders to advance a national citizenship program that is built not on the negative foundations of the past—fear over immigrant disloyalty, lack of assimilation, or loss of public benefits—but on the strengths we possess as a nation, our ideals, and how such a program would contribute to both.

U.S. Efforts Compared to Canada and Australia

The United States is a nation of immigrants who came to seek freedom and opportunity. During this era of sometimes violent immigrant protests in Europe and elsewhere, the United States can serve as a model of immigrant integration.

Unfortunately, the United States lags behind other democratic nations in providing citizenship information and assistance to its immigrants. For example, both Canada and Australia have official government policies and robust programs promoting immigrant integration. Both countries consider immigrants at their point of arrival to be on the path to citizenship, and this policy may explain why Canada⁶⁰ and Australia⁶¹ have significantly higher naturalization rates than the United States.

Australia:

In August 1998 the Australian government established an independent body, called the Australian Citizenship Council, to advise the minister for immigration and multicultural affairs on issues related to citizenship. The council consulted with the public and sought comments on a wide range of citizenship-related issues, then produced an extensive report in February 2000, entitled, *Australian Citizenship for a New Century*. The report examined Australian civic values, citizenship law, and citizenship policy and made recommendations in these areas. The Australian government produced a response to the council’s recommendations in May 2001, entitled, *Australian Citizenship...A Common Bond*.

The government of Australia views citizenship as a unifying force and has designed initiatives to encourage eligible noncitizens to naturalize and to encourage all Australians to value citizenship.⁶² These initiatives include periodic citizenship promotion campaigns using national media ceremonies for Australian citizens to publicly affirm their loyalty to the country, and civics and citizenship education in the community. The government also produces a variety of citizenship materials such as a booklet titled, *What it Means to be an Australian Citizen*, promotional posters, citizenship kits, lapel pins, and badges for use at citizenship ceremonies and other events.

Australia's Adult Migrant English Program provides up to 510 hours of free English language instruction to immigrants and refugees from non-English-speaking backgrounds. Refugees and humanitarian entrants are eligible for an additional 100 hours of instruction. The program provides about six million hours of instruction each year, and had a budget of \$137.4 million in 2004-05. In addition to free instruction, the program provides free childcare. Eligible students are required to register for the program within three months of arriving in Australia or gaining permanent residence, and must begin classes within one year.⁶³

As part of the program, students can elect to take a 20-hour citizenship course that helps them prepare for the Australian citizenship test. The course covers topics such as Australian values and principles, geography, national symbols, government, and the rights and responsibilities of citizenship. Students who successfully complete this course are not required to take the test on citizenship rights and responsibilities at the naturalization interview. Similarly, students who successfully complete the English course do not have to take the English test at the naturalization interview.

An applicant for Australian citizenship must be a permanent resident; have resided in Australia for at least two years; be able to speak and understand basic English; be able to understand the nature of the citizenship application; understand the privileges and responsibilities of Australian citizenship; have good character, and; intend to reside in Australia or maintain a close and continuing association. Australia's testing exemptions are broader than U.S. exemptions. Applicants age 50 and older are exempt from the English test requirement, and applicants age 60 and older are exempt from the privileges and responsibilities test requirement. In addition, applicants with a permanent physical or mental incapacity are exempt from the test requirements, as well as from the requirement to understand the nature of the citizenship application.

The Australian government has a broad policy that the cost of its services, including naturalization, should be borne primarily by the beneficiaries of these services. The cost of the Australian citizenship application is \$120. A reduced fee of \$20 is available for applicants who receive government assistance or show evidence of financial hardship. Applicants are required to attend an interview. If they live outside a metropolitan area, their interview may be conducted at a post office. The naturalization process typically takes about 90 days.

Unlike U.S. citizenship, Australian citizenship is not linked to public benefits or immigration benefits; there is no distinction between citizens and noncitizens in this regard.

The major benefits of Australian citizenship are government jobs, a passport, freedom to travel, and the right to vote. Australian citizens are required to vote in elections.

Canada:

Canada's Immigration and Refugee Protection Act defines the country's official policy of immigrant integration. One of the act's objectives is "to promote the successful integration of permanent residents into Canada." The act states that it is to be applied in a manner that facilitates cooperation between government and nongovernmental organizations.⁶⁴

To implement this policy, the Canadian government administers an immigrant settlement program that is designed to help immigrants adapt and integrate into Canadian society as quickly as possible. This program, delivered in partnership with volunteer organizations since 1974, is similar to the U.S. refugee resettlement program. Unlike the U.S. program, it is open to immigrants as well as refugees. To be eligible, the immigrant must be a permanent resident or have been granted permission to remain in Canada.

The Canadian settlement program includes direct services for newcomers, such as reception upon arrival, referral to community resources, community orientation, translation and interpretation assistance, counseling for those having difficulty adapting, and employment assistance. Again, this is similar to the U.S. refugee resettlement program except that it is available to all immigrants. The program also includes activities designed to improve service delivery such as conferences, publications, research, and training.

To further its immigrant integration policy, the Canadian government provides free language instruction that immigrants can access at any time during their first three years in the country. Community-based classes are available in the daytime or evenings, on a full- or part-time basis. The class curriculum includes orientation to Canadian culture, society, laws, volunteerism, and citizenship.

In addition to its settlement and language programs, Canada provides cultural orientation abroad for intending immigrants and refugees. (The United States provides cultural orientation abroad for refugees only.) A separate, refugee assistance program provides financial support to refugees for up to one year after their arrival in Canada.

Canada does not overtly promote citizenship, but seeks to create a welcoming environment that places a high value on citizenship and makes immigrants want to belong. In addition, the country prepares immigrants for citizenship by providing educational information about Canadian culture, society, laws, and the rights and responsibilities of citizenship early in the immigration process. This occurs through orientation, settlement, and language programs. The government also sponsors promotional events high-

lighting the rights and responsibilities of citizenship around holidays such as Canada Day and Veterans' Day. In October, Citizenship Week features special events such as citizenship ceremonies. Municipal officials are encouraged to make statements about citizenship in their city or town councils, and teachers are provided with an activity guide to use in the schools.

Canada's citizenship requirements are similar to U.S. requirements, but somewhat less stringent. Applicants for Canadian citizenship must: be 18 years of age or older; be a permanent resident; have lived in Canada for at least three years; be able to communicate in English or French; have a knowledge of Canadian history, geography, and government; and have a knowledge of the rights and responsibilities of citizenship. Those who are charged or convicted of certain criminal offenses are ineligible for citizenship. Applicants must pass a citizenship test on their knowledge of English or French; Canadian history, geography, and government; and citizenship rights and responsibilities. Those aged 55 or older are exempt from the test.⁶⁵

The naturalization application fee is \$200. However, if the application is denied, half of the fee is refunded. When applicants apply for citizenship, the government sends them a study guide for the citizenship test. The naturalization process, which takes 10 to 18 months, includes an interview, a security check, and an oath of allegiance. This is similar to the U.S. naturalization process. In April 2005 the Canadian citizenship and immigration minister announced a government investment of \$69 million over two years in order to reduce the naturalization application processing time to an average of 12 months.⁶⁶

The United States—Canada Naturalization Gap

A study by Bloemraad posits that a North American naturalization gap exists, as evidenced by a higher naturalization rate and the earlier naturalization of eligible immigrants in Canada compared to the United States. Bloemraad suggests that a significant influence on naturalization rates is the institutional approach of the state, whether interventionist or autonomous. She concludes that Canadian federal policies are interventionist and “encourage citizenship through symbolic support and instrumental aid to ethnic organizations and community leaders.”⁶⁷ In contrast, the U.S. approach is described as neutral, even disconnected.⁶⁸

Bloemraad notes that immigrants from different countries naturalize at different rates.⁶⁹ Even so, census data from the United States and Canada taken in 1990 and 1991 for persons from 25 nations demonstrate a higher naturalization rate and earlier naturalization of eligible immigrants in Canada. The results are consistent for three immigrant

groups that have varying lengths of residence. The trend is most striking among the earliest arrivals, but continues for decades after residency and citizenship eligibility are established. According to Bloemraad, “[a]fter 21 to 25 years of residence, the Canadian naturalization level is 95.8 percent compared to the U.S. figure of 82.0 percent”⁷⁰

Bloemraad acknowledges that rates of naturalization may vary due to length of residency, education, and English language ability. To test her theory, Bloemraad studied the naturalization rates among Portuguese immigrants living in Ontario, Canada, and Boston, Mass., based on their common characteristics. The study controlled for the strongest known influences on naturalization: place of residency, years of residency, English language ability, education, and home ownership. Living in Ontario had a positive impact on the likelihood of naturalization, 18 percentage points over living in Boston. Portuguese immigrants naturalize at 66 percent in Canada compared to 48 percent in the United States.⁷¹ Besides state policies, only two other variables, English language ability and university degree, were similarly high probability factors.⁷²

Demographer Rob Paral also supports the idea that federal intervention can encourage citizenship. He states: “The U.S. government has an inherent interest in promoting and facilitating naturalization, as opposed to the current laissez-faire approach in which immigrants are left to judge the merits of U.S. citizenship without government advice or encouragement. A more activist stance towards naturalization by the government would go a long way in fostering an ‘American’ identity among those foreign-born individuals who might otherwise remain at the margins of U.S. civic and political life.”⁷³

A More Perfect Union supports an interventionist approach in the form of citizenship promotion and support for community-based naturalization services. As shown by Bloemraad, this approach is a significant naturalization variable that can be controlled, as opposed to variables like national origin, income level, or education level. Another important variable—English language ability—should be seen as a shared responsibility.

Community-Based Organizations Leading Immigrant Integration Efforts with Little Support

In the absence of federal leadership, charitable organizations have led efforts to help immigrants integrate and become citizens through public education, naturalization and citizenship services, organizing campaigns and other political activities. In a more recent study, comparing government financial and symbolic support of Portuguese

and Vietnamese ethnic civic associations in Canada and the United States, Bloemraad suggests that the U.S. government can play a pro-active role in integration. She concludes: “State intervention can foster immigrants’ and refugees’ ability to establish and to sustain community organizations,” and “by facilitating community building, host societies can encourage migrants’ participatory citizenship in their new home.”⁷⁴

Charitable organizations in the United States have been dependent on small-scale funding from mostly private foundations to support their modest immigrant integration efforts. These efforts continue to prove that immigrants, especially those with special needs, strongly desire citizenship, lack essential information to take the first steps, and face barriers that require assistance to complete the process.

Studies Validating the Importance of Citizenship for Immigrant Integration

Many recent studies support the view that naturalization and civic participation are necessary pillars for an immigrant integration policy. Although many aspects of immigrant integration are important, this report argues that citizenship holds a high and honored place and has support across a wide political and ideological spectrum.

The U.S. Commission on Immigration Reform’s 1997 report to Congress affirmed that immigration to the United States has “created one of the world’s most successful multiethnic nations.”⁷⁵ The commission strongly supported the process of “Americanization” for new immigrants, recognizing that the process should arise from a set of shared expectations between the United States in its immigration selection policy and immigrants in choosing the United States as their new home.⁷⁶ The report concluded that naturalization is the most important act in the process of becoming an American. It focused its attention on how the government could improve its management of the naturalization process.⁷⁷

The Little Hoover Commission in 2002 studied the integration of immigrants in California. Its report, *We The People: Helping Newcomers Become Californians*, raises the concern that Lawful Permanent Residents who are slow to naturalize linger in an “in-between” status. Consequently, they are unable to hold public officials accountable through voting.⁷⁸ It also suggests that citizens may be reluctant to support local funding initiatives if these are seen as primarily benefiting noncitizens who are thought to be new to the country. The report recommended that the President and Congress work to reduce the naturalization backlogs (at the time an average of 15 months),

improve customer service, and update the public on its progress.⁷⁹ The report criticized the naturalization exam for failing to test “functional” English, knowledge beyond a set of historical and government-related facts, or an immigrant’s intention to participate in civic life.⁸⁰ It also recommended that the President and Congress create incentives for immigrants to meet their responsibilities as members of the community.⁸¹

A survey by Public Agenda for the Carnegie Corporation of New York asked immigrants to rank the major reasons to become a citizen. Respondents chose voting (76 percent), better legal rights and protections (70 percent), a commitment to and pride in being an American (65 percent), no worries about immigration status (58 percent), better employment (55 percent), easier travel in and out of the United States (51 percent), easier sponsorship of family members for a visa (36 percent), and public benefits (22 percent).⁸² These figures reinforce the significance that immigrants place on citizenship benefits, both pragmatic (rights and protections) and sentimental (demonstrating pride in being American and sharing American values).

The Pew Charitable Trusts requested studies from CLINIC, the Manhattan Institute for Policy Research and National Immigration Forum on the need and design of a large-scale citizenship project. CLINIC’s *Concept Paper on a National Citizenship Program for the Pew Charitable Trusts*, written in 2002, based its proposal for a national citizenship program on: the demographics of the U.S. legal immigrant population; the expertise of nonprofits and faith-based communities assisting immigrants; the impact of anti-immigrant legislation passed in 1996; and the nation’s response to the September 11, 2001, terrorist attacks. The goals of this citizenship proposal were family reunification, legal status leading to naturalization, civic education, voter registration, English language proficiency, non-exploitative employment, and participation in civic institutions.

The CLINIC paper outlines how a national citizenship program might be structured around the naturalization process including: outreach, intake, application assistance, ESL instruction, links to support services, oath ceremony, voter registration, voter education, and civic engagement and volunteer opportunities. The study identified immigrant-focused networks of local charitable immigration programs, support agencies, and ESL and citizenship programs that could implement a national citizenship program with foundation funding.

It recommended that funding be substantial, sustained, and distributed based on three principles. First, funding should be divided according to the proportion of Lawful Permanent Residents in an area. Second, the overwhelming majority of funding should support the work of local charitable immigration programs that were networked with

national support agencies. Third, funding should build immigration service capacity in new gateway communities. The paper concluded that the responsibility for creating new citizens should not be left solely to the federal government, charitable agencies, or to immigrants themselves, but should be a national priority.

The Manhattan Institute for Policy Research and the National Immigration Forum provided the Pew Charitable Trusts with a paper in 2003 titled, *We The People: Proposed Citizenship Project*. Its goal was to promote immigrant integration by encouraging immigrants to become citizens and making the naturalization process more meaningful. The proposed project encompassed many sectors of society, including government, civic organizations, and businesses that benefit from immigrant labor. The proposal focused on more engaging and meaningful English and citizenship classes through professional instructors and volunteers. It called for an upgraded English and citizenship curriculum and an improved citizenship test.

This paper made eight key recommendations:

- Government, but not government alone, must devote resources to build an infrastructure of community groups that can help immigrants through the naturalization process and can make this process more meaningful.
- Employers should contribute financially to citizenship programs and offer the workplace as a site for English and naturalization services.
- English and citizenship instructors, elected officials, ethnic community leaders, and volunteers should infuse the naturalization experience with patriotic and civic content.
- Citizenship curricula should teach beyond the current naturalization test and amplify on the meaning of being an American.
- The federal government should consider alternatives to the naturalization test, such as the successful completion of a certified course.
- The federal government should reduce naturalization processing times to six months or less and fund faith-based groups and other service providers to help immigrants.
- An outreach campaign promoting naturalization and citizenship needs to be established and sustained.
- A national citizenship project should promote a national dialogue about immigration and raise public awareness about the role immigration plays in American life.

These proposals to the Pew Charitable Trusts, although not funded, anticipated some of the goals and objectives of *A More Perfect Union*. All three proposals: 1) place an emphasis on naturalization and citizenship for immigrant integration; 2) call on federal leadership for a national citizenship program, spurring financial support from other government and private sources; 3) emphasize the role of charitable immigration and English language programs to help immigrants in the naturalization process; 4) call for meaningful learning and citizenship engagement opportunities before, during, and after naturalization; and 5) seek to incorporate the foreign-born fully in U.S. society.

A 2004 report, *Building the New American Community: Newcomer Integration and Inclusion Experiences in Non-Traditional Gateway Cities*, offers a program model for how governments and civil society can work together to pursue integration outcomes. The Building the New American Community (BNAC) project directed members in three communities (Lowell, Mass., Nashville, Tenn., and Portland, Ore.) to set agenda priorities and pursue activities fostering integration. Immigrant residents in each city shared four principle plans of action for integration: 1) better access to English training; 2) vocational skills training designed for the U.S. workforce and local economies; 3) youth development through the school system and community-wide services; and 4) civic engagement for greater voter eligibility, turnout at the polls and activities not requiring citizenship status.⁸³ All three cities had relatively low naturalization rates.⁸⁴

The BNAC project identified four principles that underlie immigrant integration, all of which are key elements of a national citizenship program. First, immigrants should be involved in the decision-making process. Second, integration is a two-way process that connects immigrants and receiving community members. Third, integration is a challenging process that requires “effective and meaningful” collaborations of government and the private sector. Fourth, resources of monies and time should be dedicated to integration activities that have a concrete focus and lead to systemic change.⁸⁵

A 2004 report by the Chicago Council on Foreign Relations, *Keeping the Promise: Immigration Proposals from the Heartland*, concluded that the fractured U.S. immigration system did not meet the nation’s economic needs, specifically the need to address the status of the undocumented labor force. The report recommended the creation of a national immigrant integration policy for the purpose of strengthening American communities. It saw the need for “explicit integration efforts” because of the growth and diversity of the immigrant population. The goals of an immigrant integration agenda include: 1) civic participation arising from, but not limited to, citizenship status; 2) eliminating English language barriers that inhibit integration, especially among poor immigrants; and 3) expanded partnerships between state and local government,

private employers, educational and religious institutions, labor unions, and community-based organizations.⁸⁶ The national citizenship program would directly address these three agendas.

A 2005 report by the Migration Policy Institute, *Leaving Too Much to Chance: A Roundtable on Immigrant Integration Policy*, called for a framework by which a “policy and research agenda for an affirmative and more comprehensive immigrant integration program” could be established.⁸⁷ Roundtable participants considered immigrant integration under three broad policy arenas: Pre K-12 education, employment, and civic integration. The report recognized the importance of naturalization and citizenship for civic integration: “Naturalization has historically been a key integration indicator, signaling both the society’s acceptance of the immigrant as ‘its own’ and the immigrant’s commitment to membership.”⁸⁸

Leaving Too Much to Chance examines the technical issue of USCIS’s naturalization test redesign initiative, highlighting the advantages and disadvantages of the current test and the opportunities presented by a new test. (See Chapter 6 on the citizenship test redesign process.) The report suggests that a rigorous review process be put in place to ensure a reliable, valid, and fair test. Roundtable participants offered three citizenship testing reform ideas, all of which should be included in a national citizenship program: 1) funding to create multimedia materials that can educate an array of immigrant students on history, government, and English; 2) use of immigrants and bilingual speakers to assist naturalization applicants who speak limited English; 3) meaningful research on vulnerable subgroups and on citizenship denials.⁸⁹

A federal immigrant integration policy, which starts with a national citizenship program, should spur further research and reports. (See Chapter 11, under “Research Institutions” for a list of research recommendations.) It should also encourage the exchange of opinions and ideas between experts in research, policy, and practice. (To facilitate this objective, Chapter 12 includes more than a dozen original opinion pieces, solicited by CLINIC for this report, by experts on immigration, integration, and citizenship.)

Consequences of Failing to Create a National Citizenship Program

U.S. political leaders must decide whether to continue the status quo, laissez-faire approach to naturalization or to implement an immigrant integration initiative through citizenship promotion. Failure to act could result in: long-term disenfranchisement; inter-generational civic disengagement; political alienation; fragmentation by social class, nationality, and immigration status; a large immigrant underclass; mixed-status families; and immigrant families physically separated for lengthy periods.

The U.S. government should initiate a national citizenship program as one of the best ways to advance immigrant integration. Sustained federal leadership is required to support a national program, backed by support from other funders and implemented by an existing network of national and local private organizations in partnership with an expanding circle of other sectors of society. (See Chapter 11 for detailed descriptions of 17 sectors and recommendations for each.) Modest and sporadic initiatives will not achieve the necessary goals.

A national citizenship program would lessen the disparity between educated and affluent immigrants and others. It could also serve to eliminate the myths and ease the tensions surrounding immigration. Debates over how many and what type of immigrants the country should accept have overshadowed questions of how immigrants best achieve their goals once they arrive in the United States and what support systems facilitate their integration and promote attachment to the country’s democratic principles. Currently, the lack of an immigrant integration policy places excessive burdens on state and local governments and private organizations to assist immigrants with a host of integration services, creating an anti-immigrant backlash. The debate has become mired in rhetoric, leaving the public confused and postponing practical solutions.

The time for a national citizenship program has arrived. Many pilot projects have been conducted over the past 15 years, and successful, large-scale citizenship program models have been documented. This report, in Chapter 2, presents the infrastructure of a national citizenship program, including the essential elements of leadership, funding, partnerships, geographic scope, ethical and professional standards, and program evaluation.

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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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THE NATURALIZATION APPLICATION PROCESS

This section presents an overview of the naturalization application process experienced by the majority of applicants. Those who have unique eligibility status or conditions requiring additional forms or steps may find more detailed information in *A Guide to Naturalization* (Form M-476), produced by the U.S. Citizenship and Immigration Service (USCIS), or *Citizenship for Us: A Handbook on Naturalization and Citizenship*, by the Catholic Legal Immigration Network, Inc. (CLINIC). The description of the naturalization process below is given from the applicant's perspective. Challenges and barriers in the process posed by USCIS are described in a separate section.

Steps in the Naturalization Application Process

- Step One:** Eligibility Determination
- Step Two:** Application Preparation
- Step Three:** Application Completion and Filing
- Step Four:** Fingerprints and Biometric Information
- Step Five:** Interview and Test
- Step Six:** Oath Ceremony and Certificate

Step One: Eligibility Determination

The applicant determines his or her eligibility based on many factors including: 1) age, 2) length of Lawful Permanent Resident status, 3) continuous residency in the United States and length of residency in the USCIS district where the application will be adjudicated, 4) possession of "good moral character," 5) absence of ineligibilities due to breaches of civil, criminal, or immigration laws, 6) English-language proficiency, 7) knowledge of U.S. history and civics, 8) capacity to understand and affirm the oath of allegiance, and 9) ability to pay the fee. Applicants are likely to determine their own eligibility based on the knowledge they have of naturalization law, through advice from friends and family who have become citizens, with assistance from an uncertified immigration counselor, or through paid representation from a certified immigration counselor or private attorney. Receiving assistance from a qualified professional gives applicants the confidence to make an application swiftly.

A simple list of eligibility requirements does not serve as a final checklist for making an application. Every requirement has origins in legislation or regulation with legal nuances that can be overlooked by the unassisted or unrepresented applicant. Furthermore, the Application for Naturalization (N-400) asks up to 107 questions related to

the requirements that can appear inconsequential but have severe ramifications. Each question requires a fully informed response.

Ineligibility for citizenship takes two forms. A permanent bar necessitates that the intending applicant not file for naturalization because it will result in his or her removal from the country. A conditional bar, on the other hand, is based on a temporary situation that can be addressed. Knowing the difference between permanent and temporary ineligibility is one of the most important reasons why applicants are strongly advised to seek a legal immigration consultation from an immigration attorney or an accredited representative of the Board of Immigration Appeals (BIA).

Two primary goals of a national citizenship implementation plan are linked to eligibility. The first is to expand the immigrant community's knowledge of citizenship eligibility requirements through broad, sustained public education. Lack of awareness of citizenship's benefits and eligibility requirements is one of the top reasons given by this study's interviewees as to why immigrants do not apply or delay applying. The second goal is to make members of the immigrant community aware of the qualified legal immigration services and assistance available that can ensure their protection from enforcement action and allow them to access the help they need to become citizens.

Step Two: Application Preparation

Applicants need to have all primary and secondary documentation required to file an N-400 application and complete a naturalization interview. It is important to use a checklist. Three primary documents are necessary to file the application: 1) a two-sided photocopy of a Permanent Resident Card (I-551), 2) two, full-face, color photographs, with name and alien registration number written on both on the back, and 3) a check or money order for

the total filing fee for fingerprints and processing the application. If an attorney or accredited representative is acting on the applicant's behalf, a Notice of Entry of Appearance as Attorney or Representative (G-28) is included with the package, preferably with a cover letter from the attorney or representative. The G-28 ensures that both applicant and legal representative receive all USCIS notices for future appointments and determinations.

Secondary documents are filed if an applicant faces special circumstances or eligibility status. USCIS's *A Guide to Naturalization* (M-476) and the USCIS website provide a full list of secondary documents. Some of the most common are: 1) marriage, birth, and naturalization certificates to document eligibility based on another person's immigration status, 2) passport, 3) Internal Revenue Service (IRS) tax returns, rent or mortgage payments, and bank statements proving continuous presence, 4) IRS tax returns and/or child-support payment receipts demonstrating good moral character, 5) an original, complete, court-ordered copy of any arrest record and disposition for each incident (dismissal order, conviction record, or acquittal), and 6) attachment sheets that provide needed extra information that does not fit on the N-400.

Only photocopies of primary and secondary documents should be mailed to USCIS unless originals are requested. Non-English documents must be translated into English with a letter from the translator certifying competency.

Applicants need to ensure that their ability to speak, read, and write English and to test successfully on U.S. history and civics is adequate to pass. If not, the applicant must determine if there is sufficient time before the interview to study and gain proficiency. For many, attending English-language and citizenship classes prior to, or after, the application is filed is essential since language deficiencies are often the reason for denial of citizenship.

Step Three: Application Completion and Filing

The N-400 application is available from a USCIS office, charitable legal immigration program, or private attorney. It is also posted electronically on the USCIS website. (The N-400 is a free government form. An applicant should not pay to receive a blank form.) The electronic form can be completed, but not submitted, on-line. It must be printed out and mailed to USCIS.

The applicant must read every question on the N-400 with an understanding of its legal context and must answer truthfully. Each supporting document and attachment for explanatory information is then gathered and labeled with name, alien registration number, and "N-400." The applicant's signature on the N-400 must be dated within 30 days of the mailed postmark. The contents include the total application fee by check or money order, made out to "USCIS". The memo on the check or money order should read "N-400." Fee waivers are available for applicants under limited conditions, though there is no USCIS fee-waiver form. Applicants often seek help from a charitable legal immigration service provider when applying for a waiver.

The applicant makes a photocopy of the application forms and attachments for his or her personal records. The photocopied N-400 should be studied, as the questions on the form will be asked in the interview. The photocopies can also prove useful if USCIS loses the application.

The application is mailed, preferably as certified mail, to the designated USCIS Service Center with jurisdiction over the state where the applicant lives. The four service centers and their corresponding states may be found on the USCIS website. A receipt is mailed to the applicant indicating a service center case number, which is useful for tracking the application's status in the USCIS process.

If an applicant moves after mailing the application, an Alien Change of Address Card (AR-11) must be filed. Applicants are advised to write a letter to the USCIS Immigration District Office responsible for conducting their naturalization interview to inform the office of the address change. In addition, applicants should call the USCIS National Customer Service Center at 1-800-375-5283 to provide the change of address. All three steps have proven necessary to prevent notices from being sent to the wrong address, and consequently, USCIS administratively closing the case when the applicant fails to appear for an appointment.

Step Four: Fingerprints and Biometric Information

After the N-400 application is received and accepted for processing, a Notice of Action (I-797C) is sent to the applicant, giving a date and time for fingerprints and biodata to be taken. (Applicants who are 74 years old or younger are required to provide USCIS with fingerprints and biodata. Applicants 75 and older are exempt.)

USCIS takes applicants' fingerprints, using ink or digital images, to determine any criminal history. USCIS sends fingerprints to the Federal Bureau of Investigation (FBI), where they are entered into a national database of every fingerprint taken by law enforcement agencies in the United States. All arrest records remain with the FBI even after a conviction is removed or expunged by the court. USCIS can deny an application on the basis of a criminal record barring naturalization. USCIS can also deny an applicant on the grounds that he or she lacks good moral character if the applicant fails to disclose a criminal record on the N-400 or in the interview, even if that record is not an automatic bar.

The USCIS uses two types of facilities for taking fingerprints—an Application Support Center (ASC), supervised by USCIS officers, and a Designated Law Enforcement Agency (DLEA), often a police station. The applicant is required to take the fingerprint notice, original green card (I-551), and another government-issued identification card to the ASC or DLEA in order to verify eligibility for the fingerprint appointment. Another government-issued photo identification card can be displayed if the green card is missing or pending replacement.

The applicant can request an alternate date and time for fingerprinting by filling in the reverse side of the fingerprint notice and mailing it back to the sending USCIS office. It is advisable to appear on the first date given to avoid delays. Failing to appear without notification may cause USCIS to administratively close the case. Applicants who are severely physically disabled and unable to appear can request an accommodation to have fingerprints taken at home.

The importance of applicants' understanding the consequence of arrests, citations, and criminal convictions cannot be overstated. This issue alone is reason for public education and legal assistance before filing. The consequence of filing if an applicant has a permanent bar can be removal from the country. If the applicant has a conditional bar and files, the application may be denied, the filing fee lost, and much time wasted before reestablishing eligibility.

Step Five: Interview and Test

Every naturalization applicant is required to have a face-to-face interview with a USCIS officer to determine eligibility. The interview includes reaffirming answers on the N-400 application and passing a test on English, U.S. history, and civics, unless the applicant is exempt from the English requirements.

USCIS sends the applicant a Notice of Naturalization Interview (N-450A) with date, time, and location. The notice includes a list of required documents to enter the federal building and proceed through the interview. A second notice will not be sent if the first appointment is missed. An applicant must write the USCIS Immigration District Office in charge to schedule an alternate interview date. Again, informing USCIS of a change of address with the Alien Change of Address Card (AR-11), 1-800 number, and letter to the district office is essential to avoid the case being administratively closed.

At the interview, the officer in charge greets the applicant and escorts him or her to the interview room. Unbeknownst to most applicants, the point of greeting is when officers often begin to informally test English comprehension and verbal skills. The interview begins with the applicant raising his or her right hand and swearing to tell the truth. The officer examines the applicant's green card to determine identity and residency eligibility and follows with questions from the N-400 application. Each question on the N-400 corresponds to specific statutes in the Immigration and Nationality Act. Applicants are required to affirm the truth of each response and offer written documentation in support of eligibility if any doubt arises. The interview is also the point at which an applicant can ask USCIS to correct the spelling of a name or change a name.

Next, the officer assesses the applicant's English comprehension and speaking. To formally test English literacy, applicants may be asked to read aloud parts of the N-400 application, civics questions, or several simple sentences randomly selected from a standard list used by that particular USCIS district office. To test writing, applicants may be asked to write two simple sentences from a standard list. Misspellings or grammatical and punctuation mistakes are not to be a cause for failing if a "reasonable person" can understand the sentence.

To test knowledge of U.S. history and civics, applicants are given ten questions on material taken from the USCIS list of 96 history and civics questions or federal textbooks on citizenship—*United States History, 1600–1987* (M-289), *U.S. Government Structure* (M-291), *Citizenship Education and Naturalization Information* (M-287), and *A Reference Manual for Citizenship* (M-286). Applicants must answer six of the ten questions correctly to pass the test.

At the interview's conclusion, the officer provides the applicant with a Naturalization Interview Results Notice (N-652), informing whether the application is granted, continued, or denied. Current naturalization approvals range between 70 and 80 percent. No statistics are currently available that explain why 20 to 30 percent are denied.

Approval may come at the end of the interview or in a notice in the mail shortly thereafter. Some district offices have the authority to conduct naturalization oath ceremonies and issue the Certificate of Naturalization on the same day as the interview. If not scheduled the same day, a notice is sent by mail informing the applicant when the oath ceremony will take place.

Continuation decisions occur for two reasons. First, if additional documentation is needed, form N-14 is given, explaining what information or documents must be provided. Second, if the applicant fails the English, history, or civics tests, a second, and final, opportunity to take the failed portion of the test is scheduled. Interviews are usually scheduled between 60 to 90 days after the first appointment.

Denials occur when the applicant fails to meet one of the many statutory requirements. USCIS provides the applicant with a letter explaining the cause of the denial. The applicant has 30 days from receipt of the denial letter to file an appeal with USCIS using form N-336. If USCIS denies the appeal, the applicant can file for a new review of the application in a U.S. district court.

Step Six: Oath Ceremony and Certificate

An applicant is required to take the oath of allegiance. The oath can be given in one of two formats—in a federal district court naturalization oath ceremony or in a USCIS administrative oath ceremony.

Federal district courts have jurisdictional authority to grant citizenship in a court ceremony or defer the authority to USCIS to conduct an administrative ceremony. USCIS sends a Notice of Naturalization Oath Ceremony (N-445) informing the applicant when and where to appear.

On the day of the courtroom ceremony, USCIS reviews applicant answers to questions on the reverse of the N-445 reaffirming his or her eligibility based on events occurring since the interview. Before the ceremony begins, the applicant surrenders the Permanent Resident Card.

The formal ceremony begins with the bailiff calling all persons in the room to rise. The judge welcomes the applicants and guests. USCIS assures the judge that every applicant is eligible for citizenship. The judge gives a speech highlighting the importance of the occasion. Then applicants stand, raise their right hand, and recite the oath of allegiance. A Certificate of Naturalization is given at the conclusion. After the ceremony, a community-based organization often holds a reception.

A USCIS administrative oath ceremony follows a similar format but without the impressiveness of a federal courtroom setting, the judge's oversight, and the presence of community members as honored guests. USCIS district offices attempt to make the administrative ceremony a dignified and celebratory experience. In place of a judge, a USCIS district director or designee reviews and affirms the applicants' eligibility and presides over the oath of allegiance and granting of the Certificate of Naturalization.

In either setting, the naturalization oath ceremony is an important moment in an immigrant's life. As citizenship is exercised over a lifetime, it takes on significant meaning and brings great benefits to individuals, families, communities, and the nation.

BARRIERS AND CHALLENGES POSED BY USCIS IN THE NATURALIZATION APPLICATION PROCESS

This chapter outlines the many ways in which the U.S. Citizenship and Immigration Services (USCIS) poses difficulties for applicants during the naturalization process. It draws from interviews with many legal service providers and an extensive critique of the government's processing of naturalization applications found in CLINIC's 2000 report, *Citizenship at Risk: New Obstacles to Naturalization*. (See Chapter 11 on "U.S. Citizenship and Immigration Services" for recommendations to improve the naturalization process.)

Criticisms of USCIS and its predecessor, the Immigration and Naturalization Service (INS), are not new or limited to one area or issue. Congress, the Department of Justice's Office of the Inspector General, immigration advocacy organizations, and applicants have consistently cited the same complaints, as systemic problems continue year after year. However, USCIS is not entirely responsible for all problems: Some are the result of action or inaction by Congress. These are noted separately in Chapter 5.

Although the vast majority of applicants encounter no difficulties in the naturalization process, others with unique circumstances or some minor issue can experience a myriad of problems. For these people, the exciting prospect of becoming a U.S. citizen is replaced by confusion and frustration with a government bureaucracy that does not work transparently or fairly for everyone. These inequities emphasize the need for improvements in USCIS's processing and adjudication responsibilities for naturalization applications. Systemic improvements through the recommendations made in this report will better protect and administer the path to citizenship, a bedrock of American democracy.

Access to Eligibility and Application Requirements

The federal government, chiefly USCIS, does not have any wide-reaching initiative to inform immigrants of naturalization eligibility requirements. It currently offers immigrants no information about citizenship prior to or after their entry into the United States, or when a status change is granted thereafter. USCIS is not proactive in reaching out because it lacks funding for auxiliary services to immigrants and its staff is overburdened by its main responsibility of processing applications for change of status. Eligibility

information provided by USCIS is limited and available on its website; in its publication, *A Guide to Naturalization* (M-476); or in its district offices. These limited access points leave hundreds of thousands of eligible applicants each year to seek information elsewhere.

Other sources offering eligibility information are of varying quality and cost. They include: 1) private attorneys who charge significant consultation fees; 2) unauthorized practitioners of immigration law, commonly referred to as *notarios*, who charge similarly high fees for consultations, sometimes even for a free government form; 3) travel agencies seeking to expand for-profit services to the foreign-born; 4) reference sections in public libraries; and 5) charitable immigration programs that provide public education and charge a range of affordable consultation and representation fees for low-income immigrants.

Application and Other Fee Increases

The U.S. Congress requires all immigration application-processing expenses to be fully supported through application fees (63 Federal Register 43605, January 12, 1998). To this end, Congress requires USCIS to audit every two years the true cost of processing an Application for Naturalization, including the fingerprint and biometric fee. In 1997 the total fee was \$95. In 1998 it rose significantly, to \$225, plus an additional \$25 for fingerprints. In 2002 the application fee rose to \$260 and the fingerprint fee to \$50, for a total of \$310. By 2005 the citizenship application fee had risen to \$330 and the fingerprint fee to \$70, for a total of \$400. This 320 percent increase over eight years appears particularly shocking in light of USCIS's slowness in addressing serious customer service problems. Fees are expected to significantly increase again in 2007.

Fee Waivers

USCIS has broad discretion to waive any application filing fee if the applicant provides supporting documentation that he or she is unable to pay the fee (8 CFR § 103.7(c)). INS did not issue fee waiver adjudication guidance to field offices until 1999, when citizenship advocates insisted that guidelines for the law be established prior to the significant fee increase from \$95 to \$225. The USCIS guidance requires the fee waiver to be adjudicated within five working days. Earlier, few applicants were aware of the fee waiver provision in the law. Furthermore, legal immigration representatives dissuaded low-income applicants from requesting a fee waiver since INS delayed processing the application for up to a year and denied fee waivers at a rate of almost 100 percent. Currently, the average approval rate is around 80 percent.

Unfortunately, USCIS offices continue to have wide discretion over fee waiver approval. Applicants must submit lengthy documentation of their household income and expenses, even if they have already been found eligible for a means-tested federal benefit such as food stamps. Furthermore, USCIS has failed to create a fee waiver form that would make the request easier for the applicant to prepare and for adjudicators to review supporting documentation. Private legal representatives and charitable organizations are left to create their own format for the fee waiver application.

Application Length and Detail

Accessing an Application for Naturalization (N-400) is a challenge, and understanding it completely is an even greater challenge. This is particularly true for applicants who speak limited English or have no assistance. The current N-400 application, in use since August 2001, has up to 107 questions, many requiring fully written answers, as opposed to “yes” or “no” responses.

This 10-page form requires six pages of instructions and notes that creating a form that poses the least possible burden is difficult since “immigration laws are very complex.” The instructions suggest it will take an estimated average time of two hours and eight minutes to learn about and complete the form and four hours to assemble and file the information, a total of six hours and eight minutes. This average length of time does not take into consideration the many immigrants who have language limitations. The form’s length can discourage applicants from pursuing naturalization, although having readily available, competent assistance can mitigate this drawback.

The form’s detail and complexity pose a challenge to many applicants. Of the possible 107 questions, up to 50 have legal consequences, and answering every question with full knowledge of the legal consequences is of paramount

importance. Yet not all applicants understand the context of the questions. Many questions require knowledge of naturalization law and the advice of a legal representative. Furthermore, answering truthfully is a test of good moral character, a requirement itself for naturalization.

Poor Customer Service

A persistent criticism of USCIS, and earlier, of INS, is the difficulty of getting even basic information. Often, applicants have no knowledge of the status of their cases, receive no response to their letters, cannot reach information line staff with knowledge of their cases, and receive unhelpful, even hostile responses from clerks at USCIS service desks. Congressional staff are frustrated by the deluge of requests for information on pending naturalization cases, and even they sometimes get no response or a very slow response from USCIS. Attorneys who have the legal right to represent clients are also frustrated by the information gap. Immigrants who have waited years to be called for a naturalization interview are unable to confirm with USCIS that their files are in the correct office and retrievable.

When occasional problems occur in a case, it is often impossible for immigrants to reach anyone at USCIS to resolve them. Immigrants must go to great lengths to access vital information about their cases.

Applicants may use the USCIS customer service number, 1-800-375-5283, to log a change of address, correct USCIS data entry errors, request the return of original documents, and, most often, to seek a status check on a pending case. The customer service number is often busy. Once a caller gets through, a machine directs him or her through a labyrinth of prompts, ending with a recorded voice stating the approximate length of time the case will be pending, sometimes as long as 570-600 days. This number is generated from a computer program that consistently suggests exceedingly long and often misleading ranges. Customer service representatives, when reachable after long waits, offer no more details than the digital recorded voice.

Legal immigration practitioners widely regard the customer service number as time-consuming and useless. Contract employees staff the line, and their knowledge of immigration is elementary, at best. Although this number was established, in part, for applicants to update USCIS about a new address, the system is so flawed that it is still necessary to also write a letter to the USCIS Service Center and relevant district office with the same information.

The USCIS also offers website status checks at www.uscis.gov. Although faster to access than phone information, the website gives the same status details as the 800 number—the computer-generated range of days required for the case to be completed.

Visiting the local immigration office has long been a painful exercise in endurance, patience, and persistence. For decades INS inefficiencies meant immigrants had to form long lines outside district offices in predawn hours in the hope that they would be able to get some information. After a long wait in line, immigrants often found themselves making inquiries to an inadequate number of government employees who were ill-tempered, and ill-prepared. Even a long wait did not guarantee that they would be able to see an immigration officer that day, as each district cut off new inquiries after reaching a daily quota. This treatment was normal at most large district offices.

To improve its customer service performance and reduce long lines at district offices, USCIS introduced a web-based appointment system, called INFOPASS, in early 2004. The appointment system has replaced walk-in public access at all district offices.

USCIS customers, typically immigrants and legal representatives, log on to www.uscis.gov and click INFOPASS. A language is selected followed by an appointment option. A zip code is entered to indicate the closest district office. The type of appointment is selected. Name, date of birth, zip code, phone number, and e-mail address are entered. An appointment date and time is typically scheduled within two weeks. Customers are informed about what documents are needed to enter the federal building. If no appointment times are available, the customer is asked to inquire again.

On the surface, INFOPASS appears to be an efficient use of technology to rectify long-standing problems. Lines have been significantly reduced since few districts allow walk-ins without an INFOPASS appointment, except in cases of emergency. While the system is gaining appreciation, it is not without criticism.

The primary concern of immigration advocates is for immigrants who do not have access to computers or who are not computer literate. Legal immigration representatives, as frequent users, have a wide range of opinions about INFOPASS. They report that the system is so busy that it is almost inaccessible during daytime work hours, requiring users to log on late in the evening. This time constraint poses significant problems for immigrants using computers at public libraries or social service agencies that close in the early evening or have time restrictions for computer use.

Some district offices give immigrants access to INFOPASS in their lobbies while others do not. The severe limitation on walk-in access without an appointment restricts people even with legitimate reasons from being in the building, such as family members of applicants. Rudeness by federal security guards is a frequent complaint. Even when an appointment is made, there is no guarantee that the officer

assigned will have the applicant's case file. As a result, the officer may recite the bare minimum of information from the USCIS customer service phone line or website or, worse, give incorrect information.

Electronic Filing

In January 2006 USCIS announced plans to require electronic filing for all applications, along with the creation of electronic accounts. Applicants would be required to complete a 19-page form, pay a \$100 fee, and submit fingerprints to open an account with USCIS before filing for any immigration status change. This proposal is troubling for many reasons, only a few of which are mentioned here. First, many low-income immigrants do not have access to computers or know how to use them, so mandatory electronic accounts and filing would pose a major barrier and prevent them from accessing immigration status benefits for which they are eligible. Second, a mandatory electronic system may drive many immigrants to seek help from *notarios* and create a massive for-profit industry of unqualified individuals filling out immigration forms on the computer and giving immigration advice that could have grave consequences for clients. Third, USCIS requests an enormous amount of personal information on its 19-page electronic form, and this information may be used for enforcement purposes as well as immigration status benefits. Fourth, a new computer-based system would eliminate the naturalization group application workshop model, which is paper-driven. The workshop model is a crucial component of a national citizenship program proposed in this report.

Failure to Update Change of Address Requests

Immigrants are required by law to inform USCIS of any change of address within 10 days of the change. The penalty for not notifying USCIS may be a fine, imprisonment, or removal. Although the law has been in place many years, it was never enforced in the past. Also, for years, INS consistently failed to process change of address information, causing many immigrants to miss appointments and have their cases administratively closed.

To comply with the law, immigrants may file an Alien's Change of Address Card (AR-11) or call the customer service number and give the change of address information to a customer service representative. Critics complain that information sent by card continues to not be updated in USCIS databases. USCIS uses over 50 different customer databases that are not integrated. Critics also complain that a call to the customer service number also does not guarantee that all databases will be automatically updated. USCIS has told legal immigration representatives that it is

necessary for immigrants to complete the AR-11, call the customer service number, and write a letter to the relevant USCIS Service Center and district office. Few immigrants without representation know of this persistent USCIS deficiency or how to overcome it.

Data Entry Errors

USCIS depends heavily on temporary and long-term contractual hires to conduct data entry of over a million applications for all immigration status changes per year. Data entry errors are typically wrong dates or names misspelled. Wrong dates can cause delays when USCIS erroneously believes a person is not time-eligible for a benefit. Wrong names typed on a document can cause identification confusion, also resulting in delay.

USCIS data entry clerks may also fail to enter a Form G-28 in the database. The G-28, or Notice of Entry of Appearance as Attorney or Representative, informs USCIS that the applicant has legal counsel and that all correspondences must be sent to both the applicant and representative. When USCIS fails to enter G-28 information correctly, an applicant may be informed of an interview while the legal representative is not, or the reverse. Either way, missed appointments can occur, delaying the application. To bypass this error-prone process, several USCIS applications may now be filed electronically online.

Lost or Misplaced Applications

USCIS will administratively close a citizenship application when an applicant fails to respond to a notice for an appointment or information. As mentioned, cases can be administratively closed without the applicant's knowledge if USCIS fails to update a change of address. A new policy, issued in November 2005, requires USCIS officers to confirm whether a change of address notification was submitted before closing an application for failure to appear. However, due to USCIS's lack of integrated databases, errors still occur. Closed cases are sent to the National Records Center, a record-holding cave in Missouri. Applicants must secure legal representation, or be strong advocates themselves, to ascertain the status of a closed case.

Applications are also lost at the service center where they are originally filed or at district offices where the cases are adjudicated. Lost or misplaced applications are due chiefly to data entry errors of names, alien registration numbers, and immigration status. Applicants in possession of a certified mail receipt and a copy of their N-400 Form have a better chance of getting USCIS to take action on a lost application. USCIS may also delay processing a citizenship application because it is unable to locate an applicant's alien file, or "A-file." USCIS has a total of 180 days to

determine that an A-file is not retrievable and thereafter must create a temporary file, or "T-file," reconstructing the applicant's missing file with available documents.

FBI Security Check Delays

USCIS processing backlogs for naturalization applications are legendary, reaching two years in 1999. In September 2006, USCIS announced that the naturalization backlog had been reduced to five months, eliminating the backlog. However, in its new analysis of 1.1 million pending cases, USCIS excluded from counting approximately 960,000 cases that it considers to be out of its control, such as those awaiting scheduling of a judicial oath ceremony.

Regrettably, some applicants must endure a lengthy wait due to delays by the Federal Bureau of Investigation (FBI) in processing security clearance checks. All naturalization applicants must give USCIS fingerprint and biometric data. The prints and data are given to the FBI to search its national criminal database to determine if an applicant has an undisclosed criminal record or a criminal record that is a temporary or permanent bar to naturalization. The FBI usually gives USCIS results on a fingerprint check within a 24-hour turnaround time. The delay may come in the FBI name check process when the FBI checks applicants' names against those in its international database of wanted criminals and terrorists. If an applicant's name is the same or similar to a name in the database, this is called a "hit." Applicants with common names often have many hits in the database. In these cases, the FBI must investigate further to ensure that that applicant is not the same person as on the FBI's list. This investigation may require retrieving and reviewing older, paper records from hundreds of locations. This process can take several months or years.

In May 2006 USCIS estimated that between 47,000 and 48,000 naturalization cases had been on hold more than six months pending the FBI security clearance. For many applicants, security clearances are taking one to three years or more after the naturalization interview, postponing their oath of allegiance ceremony. Some applicants have had their oath of allegiance ceremonies postponed just a few days before the date, or even on the day of the ceremony. Applicants in this situation often make multiple inquiries to USCIS on the status of their case over a period of months or years, only to be told that the FBI security clearance is pending and there is nothing USCIS can do about it. Some applicants in this situation are frail, elderly refugees who are losing Supplemental Security Income (SSI) due to their noncitizen status, and USCIS has refused to expedite their cases.

Until recently, the law required USCIS to make a decision on a naturalization application within 120 days after the interview. If USCIS failed to make a decision, the applicant could appeal the case to the federal district court, and

the court had the authority to naturalize the applicant or send the case back to USCIS with appropriate instructions. Appealing to the courts has been an effective remedy for many applicants experiencing interminable waits for the FBI security clearance. Typically, the court appeal compelled USCIS to expedite the security clearance and confirm that the applicant is eligible for naturalization so the case can be completed. In an effort to curtail applicants' ability to appeal these cases under the 120-day rule, USCIS announced a policy change in April 2006 requiring local offices to verify that the security check is completed before scheduling the naturalization interview. This policy effectively shifts the waiting period to before the interview rather than after and does nothing to address the problem of security check backlogs.

Difficulty Expediting Cases

Congressional passage of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 and the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 severely restricted noncitizen eligibility for public benefits, including SSI, Medicaid, food stamps, and Temporary Assistance to Needy Families. The welfare reform laws limited elderly and disabled refugees' eligibility for SSI to seven years. As a result, low-income elderly and disabled refugees must apply for naturalization to retain public benefits for daily support. Some may not realize they must naturalize before the seven-year limit is up. Others have already reached the limit and are facing poverty and hardship while awaiting naturalization. Loss of SSI can mean loss of housing and medical care as well.

Policy Memorandum No. 22 (10/6/97) provides guidance to USCIS offices for expediting naturalization processing for applicants facing termination of federal means-tested benefits as a result of welfare reform. Under the guidelines, expeditious processing is permitted on a case-by-case, discretionary basis for applicants who can show extreme hardship. Unfortunately, this guidance is rarely implemented. CLINIC is aware of only three USCIS field offices that have worked with local community-based organizations to expedite cases of elderly and disabled refugees losing public benefits. USCIS headquarters has been unwilling to intervene in these cases since the guidance leaves the decision to local officials, based on their workload. Nor has USCIS headquarters been willing to establish a new policy of prioritizing these vulnerable applicants as a special group. In meetings with community-based organizations, USCIS headquarters officials have blamed the elderly and disabled refugees for waiting too long to file their naturalization applications, without recognizing the many barriers, especially the lack of adequate English, often preventing these people from applying.

Difficulty of Obtaining Disability Waivers

Persons who are unable to demonstrate an understanding of the English language or knowledge of history and civics due to a physical or mental impairment are exempt from the English, history, and civics testing requirements (CFR § 312.1 and § 312.2). A majority of applicants for the medical exemption, known as a disability waiver, are elderly. Common conditions seen in disability waiver applicants are Alzheimer's disease, dementia, severe depression, post-traumatic stress disorder (PTSD), stroke, and mental retardation.

The disability waiver has been in dispute since its inception. In July 1996 a lawsuit was filed against INS for failing to implement the waiver. Amid mounting complaints by disabled immigrants, the INS finally issued administrative regulations for the waiver in March 1997, three years after the waiver was created. Following a class action lawsuit in 1998, the INS issued detailed policy guidance on the adjudication of disability waivers in April 1999.

Disability waivers remain difficult to obtain under USCIS, requiring service providers to work intensively with doctors, disabled applicants, and their families. USCIS released a new and improved disability waiver application form (N-648) in 2002, yet doctors continue to make mistakes or fail to provide the right kind of information, requiring the disabled applicant to visit the doctor two or three times, sometimes at great cost. In addition, local USCIS adjudication of waivers is sometimes inconsistent with policy guidance issued by USCIS headquarters.

In recent years, USCIS has more closely scrutinized waiver applications, especially those based on PTSD, depression, or dementia, which are common in some refugee communities that have experienced persecution or other severe hardship in their country of origin. USCIS has been placing some of these cases on hold indefinitely due to suspicion of fraud. At the same time, doctors from these ethnic communities who complete many waiver applications are often suspected of fraud themselves and black-listed by USCIS field offices. In May 2006 USCIS released new policy guidance to the field on disability waiver adjudications. The new guidance, which is intended to address USCIS's concerns about fraud, places burdensome new requirements on applicants, especially those with mental impairments. Yet the new guidance fails to provide clear guidelines for identifying fraudulent cases or procedures for investigating these cases, particularly for investigating fraudulent doctors.

Lack of Compliance on Reasonable Accommodations

Under Section 504 of the Rehabilitation Act of 1973, USCIS must provide reasonable accommodations to allow disabled applicants to participate in the naturalization process. A reasonable accommodation does not waive a legal requirement, but rather modifies it. The applicant must still meet the requirement, but the manner in which he or she meets it is modified to accommodate the applicant's disability.

Examples of reasonable accommodations include a sign language interpreter for a deaf person, an oral test for a blind person, a home interview for a person who is bedridden, and a wheelchair accessible interview site. Appropriate requests for lesser known accommodations include asking the USCIS officer to speak loudly and slowly for an applicant who is hard of hearing, asking for additional test time for a person who has difficulty writing due to arthritis, asking for a family member or other support person to attend the interview to help calm a person who has high blood pressure or developmental disabilities, and requesting a prompt interview for someone who is too ill or impaired to wait for long periods.

The Application for Naturalization (Form N-400) has a section on page 2 where disabled applicants can list any accommodations needed. In addition, Policy Memorandum No. 92 (1/21/03) requires all local USCIS offices to: provide information to applicants on how to request accommodations, create a procedure for reviewing accommodations requests in a timely fashion, and designate staff to handle accommodations requests. However, very few USCIS district offices seem to be in compliance with this guidance, and USCIS headquarters has been unwilling to survey local offices about their methods for providing reasonable accommodations. A review of USCIS district office websites found only four that provide information to applicants on how to request reasonable accommodations, and only one that provides the name and e-mail address of the staff person designated to handle accommodations requests. As a result, most disabled applicants have no way of obtaining information about accommodations or communicating their accommodations needs to the local USCIS district office conducting their interview.

Applicants who are homebound and bedridden with serious illness often have the most difficulty obtaining reasonable accommodations. Arranging to have their fingerprints taken and their interview and oath conducted at their place of residence can be difficult and time consuming for family members or service providers working with them. One challenge is communicating the need for homebound services to the local USCIS office. The applicant may have to make multiple requests for accommodations before a homebound appointment is granted. Another challenge is obtaining the

services in a timely fashion. The citizenship application may be delayed many months, as USCIS often lacks sufficient staff to handle requests for homebound appointments.

Inconsistent Provision of Due Consideration

According to USCIS Policy Memorandum No. 73 (12/26/00), all applicants should be given ten questions on U.S. history and civics, and must answer at least six questions correctly to pass. Applicants should be given up to three sentences to read and three sentences to write in English, and must be able to read one of the three sentences and write one of the three sentences in order to pass. On the writing test, applicants should not be failed for making spelling, capitalization, or punctuation errors unless the errors would prevent a reasonable person from understanding the sentence.

For applicants who struggle to pass the citizenship test, due consideration is a helpful provision. Due consideration is found in 8 CFR § 312.2(c)(2), which states that in choosing test questions, phrasing questions, and evaluating responses, USCIS officers must take the applicant's background into consideration, including age, education, length of residence in the United States, opportunities and efforts made to prepare for the test, and any other relevant factors. For example, if the applicant is elderly, has only a few years of education in his or her native country, and has faithfully taken citizenship classes for a year, the officer should use his or her discretion to adjust the difficulty of the test for that applicant and perhaps ask easier questions. Since USCIS officers may not be aware of the applicant's background, CLINIC encourages applicants to prepare a due consideration letter describing their circumstances and take this to the interview.

Because there are no clear guidelines to field offices on how to implement the due consideration requirement, it is applied unevenly among different USCIS officers and field offices. Some USCIS officers are not familiar with the requirement or do not apply it at all. One USCIS naturalization supervisor at a local district office told citizenship service organizations that his officers used randomly generated history and civics questions from the computer, and could not deviate from these questions. This practice conflicted with existing USCIS policy guidance at that time that required officers to review the randomly generated questions and determine if any were too advanced for the applicant. In its current efforts to redesign the citizenship test, the Office of Citizenship is planning to address problems with due consideration by creating clear guidelines for field offices to follow. Service organizations involved in the test redesign process believe it is very important to ensure that due consideration is provided to those vulnerable applicants who require it.

Cost and 30-day Deadline for an Appeal

For applicants who are denied naturalization, the cost of appealing a denial can be prohibitive. At \$265, it is almost as much as the \$330 cost to file a new application. Yet, an appeal has far fewer procedures and is far less time consuming for USCIS. An appeal only requires it to schedule another interview and review the file. At the same time, applicants have a 30-day deadline to file an appeal, which is often not enough time for applicants to secure legal counsel and assistance. Finally, some offices take many months to schedule an appeal interview, leaving applicants in limbo and unable to file a new application until they have a final decision on the appeal.

Conclusion

Despite all the barriers and problems described, immigrants continue to desire and seek U.S. citizenship. A majority of citizenship applicants complete the process without any problems or unusual delays. However, for the unfortunate minority that experiences a glitch, the citizenship process can be extremely frustrating and negative. USCIS must correct the systemic problems in its policies and processing of applications to ensure that fewer applicants fall through the bureaucratic cracks and to provide swift corrective action for those who do.

SYSTEMIC BARRIERS TO NATURALIZATION THAT CONGRESS CAN ADDRESS

Congress is largely responsible for many of the recurring problems in the naturalization process. It has offered no coherent legislative program in support of citizenship and has chronically underfunded the U.S. Citizenship and Immigration Services (USCIS). Congress has exacerbated USCIS's budgetary and other challenges by passing unfunded legislation and by requiring USCIS, unlike other public service agencies, to be largely self-supporting.

Fee Structure and Rates

Congress essentially requires USCIS to recover the full cost of application processing and services by collecting application fees. Congress also requires that USCIS perform an internal audit every two years to review processing costs and adjust the application fees accordingly. This system creates a number of problems for USCIS, which has experienced rising costs in recent years due to expensive new technologies and new processing requirements for quality control and national security. In addition, this system creates budget uncertainty because the funding stream is entirely dependent on the number of applications filed, which is difficult to predict. Perversely, if applications increase unexpectedly, the revenue from fees also increases, but USCIS cannot access fee revenue above its estimated budget without going through a lengthy process to obtain congressional permission. When Congress makes sporadic discretionary appropriations to USCIS, it usually restricts use of the funds to a particular problem area, such as backlog reduction. Moreover, Congress does not provide any regular, annual appropriation to support USCIS's operating costs. Ultimately, this system has led to a situation in which USCIS is entirely dependent upon application fees to support its operating costs and chronically underfunded in areas such as staffing, background checks, and new software and computer systems.

In the last few years, the fee for the naturalization application has increased rapidly, from \$95 in 1994, to \$225 in 1998, to \$260 in 2002, to \$320 in 2004, to the current fee of \$330 that took effect in 2005. In addition to the application fee, there is the fee for fingerprinting, now called "biometrics," which increased from \$25 in 1998, to \$50 in 2002, to the current cost of \$70 in 2004. USCIS has announced plans to increase fees substantially in fiscal year 2007.

The high application fee is a major barrier for low-income immigrants who desire citizenship. Although fee waivers are available for applicants who are unable to pay, they are by no means easy to obtain. The fee waiver application process is cumbersome and usually requires professional assistance to assemble all the required documentation of household income.

Moreover, the cost of fee waivers is borne by paying applicants, as USCIS estimates the number of fee waivers expected and figures this cost into the application fee. The current pattern of routine and significant fee increases creates a vicious cycle of higher fees leading to more applicants who need fee waivers, which increases the cost for paying applicants and leads to higher fees to cover the cost of more fee waivers.

Many immigrants are working poor whose income is not low enough to qualify for a fee waiver, yet too low to comfortably afford the fees. According to the Urban Institute, 41 percent, or 2.4 million, of the immigrants currently eligible to naturalize have incomes under 200 percent of the poverty level. Under the current fee structure a family will spend \$800 for the parents to apply for citizenship—more than one month's rent in many U.S. cities. Untenable fees create a permanent underclass of working poor who cannot afford to naturalize and cannot qualify for a fee waiver.

Demands by Congress and the administration that USCIS employ new technologies, quality assurance measures, and national security checks have added to its increasing operating costs. The agency estimates that current application fees include a \$5 surcharge to cover the cost of information technology and quality assurance measures. Additional security checks that were implemented after 9/11 for all applicants seeking immigration benefits require significant USCIS staff time, at an annual cost of about \$140 million and a per application surcharge of \$21.

Congress and the administration have also exacerbated USCIS's budget challenges by passing unfunded legislation. For example, in 2003 Congress passed a commendable law that waived the citizenship application fee for military personnel. However, Congress failed to fund this law, meaning family members of immigrant military personnel effectively pay for their loved ones' benefits from their own USCIS application fees. Further, under the Homeland Security Act of 2002, Congress created the Office of Citizenship (OoC) within USCIS. Although it tasked this new office with promoting citizenship, it did not provide any funds for the office's activities. The costs of both military citizenship applications and the OoC are included in the application fees as part of a \$7 per application surcharge.

Astonishingly, USCIS even charges applicants for the cost of litigation settlements, effectively forcing the same people who are harmed by USCIS's errors and mismanagement to pay for financial judgments against the agency. Litigation settlements are also included in the \$7 per application surcharge.

English Requirements and the Lack of Broader English Waivers

Congress requires that, by law, immigrants must demonstrate an ability to read, write, and speak basic English, and have a knowledge of U.S. history and civics. The English requirement poses the greatest barrier for citizenship applicants, particularly those who are elderly, disabled, low-income, and have low levels of education in their native country. Many try to obtain citizenship but fail the English test, while others are too intimidated by the test to even apply.

The law allows some exemptions to the English requirement for those meeting both age and long-term residency stipulations. The English requirement is waived for applicants who, on the date of filing the naturalization application, are either: (1) age 50 or older and a lawful permanent resident for 20 years or more; or (2) age 55 or older and a lawful permanent resident for 15 years or more. Despite the availability of this waiver, many elderly applicants are left out because they cannot meet the long residency requirement. For example, a 90-year-old applicant who has been a Lawful Permanent Resident for ten years cannot qualify for an English waiver, yet it seems unlikely that someone of such advanced age would be able to learn a foreign language. For elderly people who are illiterate in their native language or have low levels of education, particularly women in many cultures, the ability to meet the English requirement is virtually impossible. These

applicants are, however, capable of learning and demonstrating knowledge of U.S. history and civics in their native language.

Other persons who have a severe physical, mental, or developmental disability that renders them unable to learn new information may be exempt from both the English and civics requirements. Although many elderly citizenship applicants have multiple health problems, these often do not rise to the level of severity required to qualify for a disability waiver. Often, elderly applicants do not understand the eligibility requirements for a disability waiver, and believe that any kind of disability qualifies. Because they find it too challenging to learn English, many try to obtain a disability waiver and are denied.

Outside the United States, other countries with similar citizenship requirements have recognized the challenges faced by the elderly in learning English, and provide broader English waivers for citizenship. For example, Canada does not require applicants age 55 or older to pass its citizenship test, while Australia provides a waiver of the English requirement for all applicants age 50 or older.

Criminal Convictions Leading to Deportation

There are some immigrants who wish to apply for citizenship but fear doing so or are ineligible due to past criminal arrests and convictions. The Illegal Immigration Reform and Immigrant Responsibility Act (IIRAIRA), which Congress passed in 1996, makes immigrants with certain kinds of criminal convictions permanently ineligible for citizenship and subject to removal. Immigrants with such convictions who apply for citizenship can be arrested at the citizenship interview and placed in removal proceedings. These dire consequences make it extremely important for applicants with any criminal arrest history to be carefully evaluated by an experienced immigration attorney or Board of Immigration Appeals accredited representative before applying for citizenship. Some criminal problems do not make applicants ineligible for citizenship and can be overcome, but the fear of deportation keeps some eligible immigrants from applying for citizenship.

Through IIRAIRA, Congress greatly expanded the types of crimes for which immigrants can be removed, and reclassified many crimes as aggravated felonies under immigration law that were previously not considered aggravated felonies. There are now 20 categories of aggravated felonies with multiple offenses listed in each category. Some of these offenses, such as murder, rape, and kidnapping, are heinous, but others are normally classified as misdemeanors. For example, if an immigrant is convicted of petit larceny for which the sentence of imprisonment is one year, the offense is treated as a misdemeanor under

state criminal law, but immigration law treats it as an aggravated felony. For several of the listed crimes, if a sentence of imprisonment for one year is ordered, the person is considered an aggravated felon even if the sentence was suspended and the person never served time in prison. Further, the definition of aggravated felony applies to convictions entered “before, on, or after” September 30, 1996, the date IIRAIRA was enacted, thus making the 1996 law retroactive. In passing IIRAIRA, Congress also eliminated much of the discretion immigration judges had to grant relief from removal. Thus, immigrants can be removed for crimes committed many years ago, even when they are fully rehabilitated and demonstrate good moral character.

In the years following Congress’s passage of IIRAIRA, a number of removal cases have illustrated the law’s harshness and inflexibility. For example, a Cambodian man who had grown up in the United States was deported after being convicted of indecent exposure for urinating in public. In another case, a Dominican man was placed in removal proceedings for conviction of a misdemeanor offense that had occurred some 20 years earlier, when he had consensual sex with his teenage girlfriend. In the decades following his conviction, he had no further criminal record, had married a U.S. citizen, and had three children who were U.S. citizens.

RECOMMENDATIONS:

- 1** Congress must appropriate operating funds to USCIS on an annual basis rather than requiring USCIS to fund itself solely on processing fees. It must end piecemeal, discretionary appropriations in order to ensure a predictable funding stream and break the cycle of regular, significant fee increases. While Congress fully funds other immigration functions, such as enforcement, detention, and border patrol, it fails to support services. This has led to unpredictable and erratic services from USCIS, whose budget depends upon the number of applications received.
- 2** Congress must stop passing unfunded mandates that impact USCIS. It must appropriate realistic funds for new activities and initiatives that will increase USCIS’s workload and costs. Congress should appropriate funds to cover the cost of litigation.
- 3** Congress should pass a law broadening and extending the English waiver for elderly citizenship applicants, allowing them to take the U.S. history and civics test in their native language. The law should allow an English waiver for applicants who are age 60 or older.
- 4** Congress should amend the Immigration and Nationality Act so that removal is not mandatory in cases involving relatively minor crimes that occurred many years earlier and where the person can demonstrate rehabilitation. Congress should restore the ability of USCIS adjudicators to use their discretion in these cases to grant naturalization. Specifically, Congress should narrow the list of crimes considered aggravated felonies to include only serious crimes. In addition, the law should not be applied retroactively.

THE CITIZENSHIP TEST

The U.S. citizenship test is based on immigration law and regulations that require applicants for citizenship to demonstrate: 1) an ability to read, write, and speak basic English; and 2) a knowledge of U.S. history and civics.

Specifically, the law states that the applicant must be able “to read and write simple words and phrases to the end that a reasonable test of his literacy shall be made and that no extraordinary or unreasonable condition shall be imposed upon the applicant.” As to history and civics, the law states that the applicant must demonstrate “a knowledge and understanding of the fundamentals of the history, and of the principles and form of government, of the United States” (Immigration and Nationality Act § 312).

The law allows some exceptions to the English requirement for those meeting both age and long-term residency demands. The English requirement is waived for applicants who, on the date of filing the naturalization application, are either: (1) age 50 or older and a lawful permanent resident for 20 years or more; or (2) age 55 or older and a lawful permanent resident for 15 years or more (I.N.A. § 312(b)(2)). These applicants are permitted to take the test on U.S. history and civics in their native language, using an interpreter.

The immigration regulations (8 C.F.R. § 312.1 and 312.2) provide further details on how applicants’ knowledge of English and U.S. history and civics will be tested. With regard to English, the regulations state that the applicant must be able to read, write, and speak “words and phrases in ordinary usage in the English language.” The regulations also say that verbal skills will be tested through the applicant’s responses to “questions normally asked in the course of the examination” and that reading and writing skills will be tested using excerpts from the “Federal Textbooks on Citizenship written at the elementary literacy level.”

Regarding history and civics, the regulations state that the exam will be given orally in English (unless the applicant is exempt from English) and will be “limited to subject matters covered in the Service authorized Federal Textbooks on Citizenship.” The regulations further say, “In choosing the subject matters, in phrasing questions, and in evaluating responses, due consideration shall be given to the applicant’s education, background, age, length of residence in the United States, opportunities available, and efforts made to acquire the requisite knowledge, and any other elements or factors relevant to an appraisal of the adequacy of the applicant’s knowledge and understanding.” This clause is commonly called the “due consideration requirement.”

Since the late 1980s, the U.S. Citizenship and Immigration Services (USCIS) and its forerunner the Immigration and Naturalization Service (INS) have used a list of approxi-

mately 100 (currently 96) questions as the basis for the history and civics portion of the test. INS officials developed these questions based on the Federal Textbooks on Citizenship. The questions, which could be easily photocopied and distributed, were more accessible to applicants than the Federal Textbooks, which were lengthy and complex and had to be ordered from the Government Printing Office for a fee. The questions were also easier for USCIS officers to use, as they provided guidelines for test questions.

Problems with the Current Test

Administration of the citizenship test has long been beset with problems. Citizenship service organizations, such as the Catholic Legal Immigration Network, Inc. (CLINIC), have mainly criticized USCIS for its lack of consistency in administering the citizenship test, both among different USCIS district offices and among different officers in the same office. They have called on USCIS to strengthen and standardize the current test to address the inconsistency problem. Service organizations never complained that the test lacked meaningfulness or called for the creation of a new citizenship test.

The lack of standardization means that the test’s level of difficulty has varied greatly among district offices and officers. For example, until recently officers were free to either choose history and civics questions on their own or use random questions generated by USCIS’s computer software program, CLAIMS-4. Some district offices gave a written test of history and civics, while others gave an oral test. For the written test, some offices used multiple choice history and civics questions and some used open-ended questions.

Officers currently use different materials for the reading and writing portion of the test. Some use a prescribed list of sample sentences, some make up their own sentences, and still others draw sentences directly from the Federal Textbooks. Some offices use history and civics-related sentences for the reading and writing test, while others use

sentences about daily life. These discrepancies have resulted in a citizenship test that is unfair because there are widely varying degrees of difficulty and no standard way to test and evaluate applicants' knowledge. Applicants do not know what to expect or how best to prepare for the test. Citizenship instructors try to balance the need to teach broad naturalization and citizenship information with the vagaries of USCIS district office styles.

Moreover, some officers are not familiar with the due consideration requirement or do not apply it as required by the regulations. One USCIS naturalization supervisor at a local district office told citizenship service organizations that his officers used randomly generated history and civics questions from the computer, and could not deviate from these questions. This practice conflicted with existing USCIS policy guidance at that time that required officers to review the randomly generated questions and determine if any were too advanced for the applicant.

Reasons for Test Revision

The U.S. Commission on Immigration Reform, as mandated by the Immigration Act of 1990, produced a report about immigration and citizenship in 1997 entitled, *Becoming an American: Immigration and Immigrant Policy*. In its report, the commission criticized the citizenship test for not adequately assessing whether applicants have a “meaningful knowledge” of U.S. history and civics and an ability to communicate in English. The commission noted that the civics test “relies on memorization of discrete facts rather than on substantive understanding of the basic concepts of civic participation.” The commission also criticized the test’s “lack of uniform standards” and called on USCIS to develop a new citizenship test with the assistance of professional educators, pedagogical experts, and standardized test providers. In addition, the commission recommended separating the English portion of the test from the interview to reduce applicant anxiety and increase officers’ efficiency. The commission also recommended that Congress reduce the years of residency required to qualify for the age and residency-based English exemption.¹

Role of Citizenship Test Preparation Classes

While citizenship service organizations generally agree with the commission’s criticism that the test lacks uniform standards, most do not agree that it lacks inherent meaning. The lack-of-meaning argument has been promoted chiefly by social conservatives, who believe the current test lacks key concepts and encourages memorization.

Service organizations and those who work directly with immigrants preparing for the citizenship test have noted that the process of preparing for the test is very meaningful, particularly for those who attend test preparation classes. The scope of the classes usually goes far beyond memorizing the 96 questions to include substantive lessons about constitutional freedoms, key historical figures, and the rights and responsibilities of citizenship. It is noteworthy that the immigrants who attend test preparation classes and therefore experience a more “meaningful” citizenship test are typically those who are low-income, have low literacy, and speak limited English. In other words, they need to take a class in order to pass the test. For those higher income immigrants who are well-educated and able to prepare for the test without assistance by memorizing the 96 questions, the test may, indeed, not be as meaningful. Many citizenship service organizations suggest that the best solution for any lack of meaningfulness in the test is modification of the current list of 96 questions, more funding to expand the availability of citizenship classes, or mandatory attendance of citizenship classes in lieu of a test.

USCIS Testing Guidance

In an effort to respond to the criticisms of the commission, USCIS issued policy guidance in December 2000 that sought to standardize the citizenship test by describing in detail how the test would be administered and how pass rates would be determined (Policy Memorandum No. 73). The guidance states that the applicant’s ability to speak English will be deemed sufficient if the applicant “can respond meaningfully to questions relevant to the determination of eligibility.” The applicant is not required to “understand every term, word, or phrase on the N-400 application” and the officer is required to repeat and rephrase questions for the applicant as necessary.

For the English reading test, the guidance strongly encourages officers to use sentences drawn from an official list, called “Sample Sentences for Written English Testing.” The applicant should be given the opportunity to read up to three sentences if necessary, and will pass the reading test if he or she can read “one sentence in a manner suggesting to the officer that the applicant appears to understand the meaning of the sentence at a general level.”

For the English writing test, the guidance encourages officers to use sentences from the same list as the reading test. Each applicant should be given up to three opportunities to write a sentence if necessary, and the officer should repeat each sentence clearly if asked. The applicant will pass the writing test if he or she can write “one sentence that would be understandable as written to a reasonable person.” The guidance states that the applicant should not be failed because of spelling, capitalization, or punctuation errors “unless the errors would prevent a reasonable person from understanding what the sentence means.”

For the U.S. history and civics test, the guidance states that applicants should be given ten questions and encourages officers to draw questions from the official list of 96 questions. The applicant must answer at least six of the ten questions correctly for a passing score.

Citizenship service organizations that had criticized the test's lack of standardization were generally pleased with the December 2000 policy guidance and encouraged USCIS to strengthen the guidance by making it binding. However, USCIS has not turned the guidance into regulation, and instead has treated it as a temporary fix until the citizenship test can be overhauled and revised, as recommended by the U.S. Commission on Immigration Reform.

USCIS Efforts to Revise the Citizenship Test

USCIS began to work intensively on the redesign of the citizenship test in 2002, and contracted with MetriTech, a company experienced in designing standardized tests for schools and motor vehicle departments, to design a new test and study guide. USCIS invited citizenship service organizations to participate in the redesign process in June 2002, when MetriTech conducted a stakeholder survey on what content should be included in the test and what level of difficulty or understanding should be required of applicants. Many service organizations complained that the number of respondents was limited because the survey was not widely distributed and did not give enough turnaround time for them to participate. Survey results were presented at a July 2002 meeting with service organizations. The main topics identified for inclusion in the test included the Constitution, the Bill of Rights, the Declaration of Independence, democratic principles and values, key colonial figures and their contributions, the separation of powers, and the amendment process.

In July 2002 USCIS invited citizenship service organizations to attend a bias review of sample test questions and a draft study guide. The proposed test in the bias review was significantly longer and more difficult than the current test, with 20 multiple choice questions on history and civics, 16 multiple choice questions on reading comprehension, four writing tasks, and two speaking tasks. Service organizations were alarmed by the level of difficulty of the test questions, and raised serious concerns with USCIS staff working on the redesign. However, the staff did not indicate a willingness to consider these concerns or change course. As a result, many organizations sent letters to the USCIS director of operations in August 2002 expressing their concerns about the test redesign process.

Formation of the Stakeholder Working Group

The director of operations responded by reassigning responsibility for the test redesign process to a different staff person who had extensive experience working with service organizations. The new project leader formed a stakeholder working group with citizenship service organizations and began meeting with them regularly. The initial working group was small and consisted of about ten organizations, including CLINIC, the National Association of Latino Elected and Appointed Officials, the New York Immigration Coalition, the Illinois Coalition for Immigrant and Refugee Rights, and the Hebrew Immigrant Aid Society. Most of the organizations represented national or state networks of citizenship service providers. The group also included ethnic-based service organizations and state immigration coalitions. The USCIS test redesign project leader sought the input of other professionals as well. In order to determine the body of knowledge to be used for the history and civics test, the project leader created a panel of U.S. history and civics experts from academia and think tanks, representing the political spectrum. The panel was also tasked with drafting a study guide for the history and civics test.

The First Pilot of the Test

At the same time, USCIS proceeded with plans to pilot the proposed English test material in six USCIS offices. The first phase of the pilot included only the English reading, writing, and speaking portions of the test, and not the history and civics section. Participation was voluntary, and the pilot questions were asked after the interview and had no bearing on applicants' citizenship eligibility. Data collected from the first pilot was to be used to redesign the English materials and to set up scales for grading the English test. The first pilot was conducted from March to June 2003 in Sacramento, Atlanta, Newark, and two sites in Los Angeles—Bellflower and El Monte.

In August 2003 the working group received a draft copy of the pilot results. Among the findings of concern to service organizations was that 10 percent of those who passed the current test performed poorly on the pilot test. Reading and speaking were the most difficult portions of the pilot. In addition, data indicated that poor performers on the pilot were more likely to report Spanish or Vietnamese as their native language. Following discussions of the results with the working group, USCIS agreed to obtain additional input on the proposed redesigns from educators working with low-literate students by expanding the working group and to test alternative formats in the second phase of the pilot, planned for late 2003.

In late 2003 the panel of U.S. history and civics experts produced a draft study guide that service organizations widely criticized for being “poorly written, poorly organized, and filled with cultural and political bias.”²² In addition, service organizations agreed that the guide was written at too high a reading level and lacked content on civic participation. Calling the study guide “fatally flawed,” they wanted USCIS to discard it and start over. USCIS refused to discard the draft study guide, but agreed with the service organizations’ request to contract with an expert on English as a second language (ESL) to rewrite it at a lower reading level that would be accessible for applicants who speak basic English, and also to have a panel of ESL experts review the redesigns and provide additional feedback.

On January 14 and 15, 2004, USCIS organized a national stakeholder conference to gather input on the test content, format, and study guide. Approximately 125 people attended, including USCIS officers, ESL and citizenship teachers, and representatives from community-based and service organizations assisting immigrants in the naturalization process. It was a unique gathering of people and organizations that had not met before. The agenda included breakout sessions on: item formats for testing English reading, writing, and speaking skills; item formats for U.S. history and civics; the structure of the study guide; and U.S. history and civics content; and it provided opportunities for group feedback and discussion. Service organizations were generally pleased with the quality and productivity of the discussion, and the representative mix of attendees. However, USCIS did not feel that there was adequate consensus in participant feedback, so the staff compiled a list of recommendations collected at the conference and asked attendees to complete a survey, responding to the recommendations.

Role of the National Academy of Sciences

By spring 2004 USCIS and working group members had reached a general agreement that the methodology of test design and assessment was of great importance and was not within the expertise of the group or the USCIS staff working on the redesign. As a result, and at the request of the working group, USCIS contracted with the National Academy of Sciences (NAS) to study and guide the test redesign process. Specifically, NAS was asked to assess the validity, reliability, and fairness of a redesigned test and provide guidance on the redesign process.

NAS formed a steering committee of 18 experts in ESL, adult education, U.S. history and civics, and psychometrics. The committee was co-chaired by Lorraine McDonnell, Department of Political Science, University of California, Santa Barbara, and Barbara Plake, Buros

Center for Testing, University of Nebraska, Lincoln. NAS collected stakeholder input in a series of meetings and organized a conference in Washington, D.C., on December 15, 2004, that drew about 50 stakeholders from across the country. A few days before the conference, NAS produced an interim report with recommendations on the test development process.

The NAS report had four key recommendations:

- 1) USCIS should put in place an advisory structure to advise the agency in making important decisions about the naturalization test redesign.
- 2) Aided by a technical advisory panel, USCIS should create a detailed plan for test development, to be reviewed by an oversight committee. The research and test development plan should comply with testing standards and include all of the necessary steps for developing a valid, reliable, and fair test.
- 3) Work on developing the content frameworks, including publishing the history and civics framework in the Federal Register, should cease until a clear, transparent, and publicly accountable process is defined and vetted with an oversight group.
- 4) After a determination has been made about the various item formats that will be used on the redesigned test, USCIS and its testing contractor should develop a detailed plan for a standard setting, with input from the technical advisory group and a final recommendation by the oversight committee.

The Office of Citizenship in Charge

In late March 2005 USCIS made a surprise announcement to service organizations regarding three major changes in the citizenship test redesign process. First, responsibility for the test redesign would be shifted from USCIS operational staff to the Office of Citizenship (OoC). Second, USCIS’s contract with the NAS would be terminated and OoC would not implement NAS’s recommendation to create a broad advisory panel. Third, the target date for completing the test redesign would be January 2007.

Citizenship service organizations strongly opposed these changes, and voiced a number of objections to USCIS in meetings and in writing. A major concern was the January 2007 target date, which they felt was arbitrary and did not recognize the complexities of the test redesign process. Previously, USCIS staff had made a commitment to service organizations that they would have one year between test redesign completion and implementation to prepare immi-

grant communities for the new test. Service organizations noted that the redesign will have a major impact on millions of immigrants for decades to come and should not be rushed.

Another concern of service organizations was staffing changes. Since the three USCIS staff who were overseeing the test redesign process declined to be reassigned, service organizations worried that years of accumulated knowledge, information, and stakeholder input might be lost in the transition to the OoC. In addition, the large workload created by the test redesign process might detract from OoC's mission and current initiatives promoting citizenship instruction and training. Moreover, service organizations, which had requested the involvement of NAS, were pleased with its work and recommendations. They felt that the broad oversight committee recommended by NAS would bring the perspectives of a diverse group of constituents and stakeholders into the test redesign process and provide credibility for USCIS efforts.

At an April 6, 2005, meeting with stakeholders, the OoC director offered assurances to the citizenship service organizations. The director argued that the test redesign process was well within the mission of the OoC, and pledged to continue meeting with the stakeholder working group and keep the redesign process transparent. He also stated that he was committed to creating a fair and meaningful test that would not be more difficult than the current one. In addition, he assured service organizations that the January 2007 deadline was a "flexible target date" and not set in stone. At the same meeting, service organizations presented the OoC director with a list of guiding principles for the test redesign, signed by ten organizations, and a list of questions about the test and the redesign process.

The Records Study

In summer 2005 OoC conducted the records study long planned by USCIS. The purpose was to determine the actual pass/fail rate of applicants as a baseline for the redesigned test. This information was necessary because service organizations had insisted, and both USCIS and OoC had promised, that the redesigned test would not raise the failure rate and present a higher bar to applicants. The study was based on a random sample of approximately 3,000 naturalization case files completed in FY 2003 and FY 2004. Most of the files were located in USCIS's central storage facility, but some had to be requested from local USCIS offices, slowing the process. Service organizations were consulted and provided input on what kinds of data to collect from the files.

At the same time, USCIS's contract with MetriTech ended, and OoC awarded the competitive contract to a new company. Service organizations had increasingly criticized MetriTech for its lack of expertise in adult and ESL education. In October 2005 OoC introduced service organizations to its new contractor, the American Institutes for Research (AIR).

The full results of the records study were presented to service organizations in a February 2006 report. The study showed that 84 percent of applicants passed the current citizenship test on the first try, and 95 percent passed it on the second try or a subsequent application. The study looked at various applicant characteristics and found lower pass rates for elders, refugees, applicants from the Caribbean and Central America (including Mexico), and applicants with more years of Lawful Permanent Resident status. There was no difference in pass rates by race, looking at Black, White, and Asian; however, the study did not break out Hispanics/Latinos.

The Office of Inspector General Report

In June 2005 the Department of Homeland Security's Office of Inspector General (OIG) produced a report on the citizenship test redesign, noting several technical and policy challenges. OIG cited the conflict between the basic level of English required to pass the test and the requirement to demonstrate knowledge of abstract U.S. history and civics concepts that may exceed English ability. OIG also pointed out the challenge of providing due consideration within a more standardized test, and stated the need for "detailed and carefully construed standards" for applying due consideration in a redesigned test. In addition, OIG noted the challenge of creating a more meaningful test without raising the level of difficulty, and felt that the stated goal of not raising the fail rate called into question the need for a redesigned test. Based on these issues, OIG recommended that USCIS take steps immediately to standardize the current test while the new test is being developed.

The Naturalization Test Redesign Project Plan Overview

In July 2005 OoC met with service organizations and presented its Naturalization Test Redesign Project Plan Overview for feedback. The plan consists of six phases: discovery, test development, pre-implementation, implementation, and post-implementation. The discovery phase includes a records study, a due consideration study, an impact analysis, and a feasibility review. The feasibility

review will describe testing alternatives and the benefits and cost of each and will identify and justify the recommended approach. The plan keeps the 2007 deadline for completion of test development, but provides one to two years for training, dissemination, and community outreach before implementation of the new test. Several organizations submitted written comments on the plan. As part of its plan, OoC also created an internal stakeholder group of OoC staff from the offices of field operations, general counsel, and policy and strategy.

In redesigning the test, one alternative that OoC will consider is up-front testing, allowing applicants to pay a fee to take the test prior to submitting the citizenship application. Proponents believe this model has several advantages. It would save applicants time and money because those who could not pass the test would avoid applying. It would also give applicants who can pass the test a sense of self-confidence and would reduce their testing stress because the entire application would not be at stake. Applicants could take the test as often and as many times as they wanted. Up-front testing would increase USCIS's efficiency because officers would not have to test applicants at the interview and workers would not have to process applications for those who are unable to pass the test. Service organizations recognize these advantages but have concerns about how to preserve reasonable accommodations for disabled applicants and due consideration. The fear is that officers would have no way of knowing applicants' unique and individual circumstances in a walk-in situation.

The Feasibility Review

USCIS conducted the feasibility review in late 2005, gathering information through focus groups with community-based organizations in the Washington, D.C. area. The purpose was to look at various options for changing the test and the testing process and conduct a cost vs. impact analysis of each option to determine the best course of action. The results were presented in a report to service organizations in early 2006. At the request of service organizations, OoC produced a separate report summarizing input received from groups outside the D.C. area. The feasibility review identified changes that could be made to improve test standardization and meaningfulness with the least amount of burden to USCIS. It was determined that changes to test procedures, format, and content would be the most burdensome and that training for USCIS officers, standardization, better test preparation, and increased outreach efforts would be the least.

The TESOL Panel

In early 2006 OoC formed a working group of ESL experts to advise on an appropriate English level for passing the test and to assist in writing test questions. The group met in early May 2006 for three days to examine the English reading and writing portions of the citizenship test, and it recommended that the high-beginning ESL level based on Department of Education reporting standards was most appropriate and consistent with Immigration and Nationality Act requirements. The group also decided to emphasize civics in the questions testing English reading and writing, wrote sample reading sentences, and created guidelines for testing applicants' writing skills. The group used the current 96 questions along with additional content provided by OoC to write approximately 140 U.S. history and civics test questions at the high-beginning level. These questions were reviewed by civics experts. The group also developed English reading and writing items at the high-beginning level. The ESL group joined OoC's contractor, AIR, to develop re-phrased questions from the N-400 application at the high-beginning level for use by adjudicators in testing applicants' ability to speak English in the citizenship interview.

Interim Measures

Based on OIG's recommendation in its report on the test redesign, OoC is taking immediate steps to standardize the current test while the new test is being developed. For the history and civics test, OoC is weighing the current 96 questions and creating preprinted forms of ten questions each that are equivalent in level of difficulty. This will replace the current system of using ten questions randomly generated by computer. OoC plans to have a due consideration version of the preprinted forms with less difficult questions. OoC is not changing the reading and writing portions of the English test, but it plans to limit the questions asked about the N-400 Form to those requiring basic spoken English, and to provide standardized, rephrased questions for USCIS officers to use when applicants do not understand a question. OoC implemented these interim measures in October 2006.

Pilot Test Plan

In November 2006, OoC presented a pilot test plan prepared by its contractor, AIR. The plan describes the selection of pilot sites, recruitment of participants, development of test materials, administration of the test, analysis of pilot test data, and preparation of a final report. Ten local USCIS offices were randomly selected to participate in the pilot. This group is comprised of large, medium, and small offices located throughout the U.S. To

recruit participants, USCIS will send a package to all applicants who apply for naturalization in each of the pilot sites. The package will include an explanation of the pilot test and study materials for the pilot test. Participation in the pilot will be voluntary. Applicants who pass the pilot test will be deemed to have met the English and civics testing requirement. Applicants who fail the pilot test will be given an opportunity to take the current citizenship test. Approximately 5,000 applicants will receive the pilot test.

OoC expects that the pilot will begin in January 2007 and will last three to four months. AIR staff will visit each of the pilot sites to help train adjudicators and monitor the administration of the pilot test. AIR will also conduct focus groups with adjudicators at each of the pilot sites to collect their feedback on test materials, administration procedures, and scoring rubrics. AIR will analyze the data collected in the pilot and produce a report recommending the test items to be included in the final test, organizing the selected test items into test booklets of equally weighted difficulty, and suggesting possible revisions to test administration and scoring procedures for the final version of the new citizenship test.

Citizenship service organizations have raised several concerns about the pilot. They favor the test being given to a diverse group of immigrants, and have noted that the ethnic diversity of pilot participants is extremely important to ensure that the new citizenship test does not have a disparate impact on any particular ethnic groups or nationalities. In addition, they are concerned that because participation is voluntary and not mandatory, applicants who struggle to pass the current citizenship test will likely opt out of the pilot, and the results will be skewed with a higher passing rate. OoC is relying on local community-based organizations that work with these applicants to encourage them to participate in the pilot.

The New Test Questions

In November 2006, OoC released information about the redesigned citizenship test, including a list of 144 new study questions on U.S. history and civics that would be used in the pilot. Based on the pilot results, OoC plans to eliminate a number of the questions, reducing the final list to approximately 100 questions. As with the current test, applicants will still receive 10 questions and be required to answer six correctly to pass the history and civics test.

The redesigned English test also will be similar to the current test. Applicants will have up to three chances to read and write a sentence in English. However, instead of studying a list of English sentences, applicants will study a vocabulary list of words that are used in the sentences. In addition, the new reading and writing sentences will cover

U.S. history and civics. Applicants will be asked to read a sentence, and then they will be required to write the answer that is dictated to them. OoC plans to pilot 35 reading and 35 writing test items. The English speaking test will continue to be based on the applicants' answers to questions normally asked about the citizenship application during the course of the citizenship interview. However, USCIS examiners will be given a list of re-phrased questions they can choose to use if applicants do not understand a particular question.

Conclusion

As this report is being written, the redesign of the citizenship test is still in process and the outcome unknown. The new test has major implications for who will become citizens and will affect millions of applicants in the years to come. Of the eight million immigrants currently eligible for citizenship, 55 percent are estimated to have limited English proficiency, and one-quarter have less than a ninth grade education. The new test will determine whether U.S. citizenship remains accessible to all immigrants or only the privileged and well-educated.

RECOMMENDATIONS:

- 1** The new citizenship test should adhere to the current statutory requirements for level of difficulty and use of discretion. In particular, it should not exceed the current statutory requirement of evaluating the applicant's ability to read and write "simple words and phrases" and to demonstrate an understanding of the "fundamentals" of history and civics. The revised test should also adhere to the current statutory requirement of not imposing "extraordinary or unreasonable conditions" on an applicant. A test that is considerably longer than the current test or more complex in structure and implementation would impose an unreasonable condition.
- 2** In the new citizenship test, USCIS must preserve due consideration as provided in current law, and allow officers to use some discretion in testing based on the applicant's background.
- 3** The new citizenship test should not adversely impact vulnerable applicants, particularly the elderly, disabled, low-income, low-literate, and those who speak limited English. In addition, a new test should not adversely impact any specific ethnic, national, or language group.
- 4** A new citizenship test must be flexible enough to accommodate applicants with special needs, such as those with disabilities.
- 5** USCIS should ensure that the new citizenship test does not raise the failure rate and exclude more people from citizenship, but rather provides an opportunity for

greater success. The goal of the test redesign process should be to encourage more people to naturalize.

- 6** At all stages, the citizenship test redesign process must be transparent and open to input by stakeholders, particularly from organizations that provide citizenship services. While keeping the process open to public scrutiny, USCIS must guard it from political interference.
- 7** The study guide for the new test should be nonpartisan and accessible to applicants at the basic level of English. The guide should emphasize the economic, social, and civic contributions of immigrants to the United States, and should describe the rights and responsibilities of U.S. citizenship, with specific information on opportunities for civic participation. The guide should be available in alternate formats for applicants with disabilities.
- 8** USCIS's test redesign contractor must have expertise in adult education, adult literacy, and ESL education for adults.

- 9** The costs of implementing and administering a redesigned citizenship test should not be borne by applicants through higher application fees that would further exclude low-income immigrants from the naturalization process.
- 10** USCIS must train and monitor officers to ensure the redesigned citizenship test is implemented correctly.
- 11** USCIS should ensure that the new citizenship test does not create any undue delay in the naturalization process.
- 12** USCIS should provide funding to service organizations to support English and citizenship test preparation classes as part of the implementation of the new test.

1 U.S. Commission on Immigration Reform. Report to Congress. *Becoming an American: Immigration and Immigrant Policy* (September 1997), p. 46-48.

2 Catholic Legal Immigration Network, Inc. Letter to U.S. Citizenship and Immigration Services (January 21, 2004).

PREPARING IMMIGRANT LEARNERS FOR CITIZENSHIP

This chapter presents five important topics concerning educational supports given to immigrants learning English and naturalization content to become U.S. citizens. The first topic describes immigrants with different levels of ability and preferred modes of educational interventions. The second topic presents standards of ESL/citizenship instruction to ensure learner success and best use of resources. The third topic describes the components of an ESL/citizenship program and how programs can be best managed given limited monetary and human resources. The fourth topic presents ideas about how ESL/citizenship curricula can be developed and instructed to increase learner confidence, citizenship test and interviewing skills, and knowledge of meaningful and functional aspects of citizenship. The fifth topic presents the current sources and levels of funding for ESL and citizenship instruction and organizations involved in preparing immigrant learners to become U.S. citizens. Each section offers recommendations in the area of ESL and citizenship instruction for a national citizenship program.

Different Learners, Different Services

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From an educational standpoint, nearly every immigrant has the potential to become a U.S. citizen. Most are able to navigate the naturalization system without assistance. Some require minimal assistance, in terms of information and self-study materials. A great many immigrants hope to naturalize someday, but do not have access to the instruction and application support they require in order to succeed.

The national population of potential citizens falls along a broad spectrum of educational levels, from individuals with no formal education to those who come to the United States with advanced degrees. Similarly, their range of oral and written English language proficiency varies from individuals who can speak only a few words of English, to those with advanced fluency. The level of support each individual may need in order to naturalize depends on several factors: oral English proficiency; literacy level (in both the native language and in English); the degree of familiarity (in any language) with concepts of history and government; and potential limiting factors such as disabilities, advanced age, trauma, and test anxiety.

In order to provide the appropriate level of services, while conserving resources to provide for the broadest possible number of potential citizens, it is important for programs to understand learners' strengths and needs at the outset. Where one potential citizen may need only an application packet with study questions, another may need several months or years of classroom services or volunteer tutor instruction. By assessing learner needs, programs can tailor services accordingly.

Educational Characteristics of Today's Immigrant Population

In recent decades, the immigrant population has shifted in terms of countries of origin, educational levels, and geographic locations. Unlike earlier waves of primarily European immigrants, the current immigrant population is largely Latin American (51 percent) and Asian (25.5 percent).¹ According to the Center for Immigration Studies, today's immigrants are more likely to live in poverty than earlier groups, and the main reason for this is lower educational levels.² The limited English speakers in the population tend to be the newest immigrants with the lowest levels of education. Nearly 60 percent arrived in the last ten years, and 50 percent reported having nine years or less of education. Of special note, 75 percent of those speaking limited English are Spanish speakers, and more than half are Mexican.³ Of the immigrants now eligible to naturalize, 41 percent (2.4 million) have incomes under 200 percent of the poverty level, including 17 percent with income under the federal poverty level.⁴ Poor immigrants often face many challenges simultaneously: Earning enough income to pay for housing, childcare, food, transportation, and clothing may require all adult family members to work one or

several jobs. This need presents challenges to service providers in terms of scheduling and delivering instruction to adult family members.⁵

New trends in the 2000 census data show that the immigrant population is now spreading beyond a few large cities and is growing quickly in suburbs and small towns of the Northeast, Midwest, and South. While two-thirds of immigrants in the United States live in traditional gateway states such as California, Florida, New York, New Jersey, and Illinois, newer groups of immigrants are increasingly dispersed in areas that have relatively little experience in providing services to limited English speakers. In the 1990s, 22 states with formerly low numbers of immigrants saw their immigrant populations increase by more than 90 percent due both to direct immigration and secondary migration from traditional receiving states such as California.⁶ Almost 60 percent of the immigrants in the new growth states have arrived since 1990,⁷ and about 1 million (12 percent) of those eligible to naturalize live in these 22 states.⁸ These newer areas of resettlement have less experience with immigrant residents and often have fewer resources for needed services such as English language instruction or citizenship preparation courses.

A 2003 Urban Institute report indicated that more than 7.9 million legal immigrants were currently eligible to naturalize. Many of these immigrants faced barriers such as limited English skills, little formal education, and low incomes. The study found that among immigrants that were currently eligible to naturalize, about 60 percent (about 3.5 million) had limited English proficiency, including about 40 percent who speak English “not well” or “not at all.” The study looked at a cohort of immigrants who, in 2002, were “soon to be eligible” for naturalization, and found the trend accelerating: At least 1.5 million or 67 percent of the group (virtually all of whom will be eligible for citizenship by 2007) had limited English proficiency. The authors of the study conclude: “Many in this group could benefit from expanded language and civics instruction programs.”⁹

Data indicate that the most recent immigrants to arrive in the United States have less education than their predecessors. A study of educational levels of immigrants now in the workforce shows that of those who arrived in the 1980s, 30 percent lacked a high school diploma. Of those who arrived in the 1990s, 35 percent did not have a high school diploma.¹⁰ One quarter of the immigrants now eligible for citizenship (1.4 million) have less than a ninth grade education. Significantly, only 9 percent of those who have recently succeeded at naturalizing have similarly low levels of education.¹¹ This low percentage suggests several things: Immigrants with lower levels of education may be more wary of applying for citizenship, some are not succeeding in their attempts to naturalize, and an

increasing number of immigrants are likely to need language and literacy education in order for naturalization rates to remain stable, or to rise in the future.

The U.S. Citizenship and Immigration Services (USCIS) recently commissioned a study of citizenship-test pass rates of various immigrant groups, which offers some clues about which groups are most vulnerable to failure. A random sample of applications, completed in fiscal years 2003 and 2004, showed that among those taking the citizenship test for the first time, the overall pass rate was 84 percent.¹² One group with significantly lower pass rates was the elderly, with only 46 percent of those 65 and older passing the test on their first try. Also of interest is the 50 to 64 age range with an initial pass rate of only 69 percent. Initial pass rates were significantly lower for refugees (77 percent) and asylees (74 percent) than for those with a different immigration status (86 percent).¹³ Pass rates also varied by region of origin. For example, only 78 percent of immigrants from Central America and the Caribbean passed the test on their first attempt. Among applicants from the top ten originating countries, the lowest pass rates were for immigrants from Dominican Republic (69.9 percent), Iran (71 percent), Mexico (76.9 percent), and Vietnam (75 percent).¹⁴ These statistics suggest that a national strategy for facilitating naturalization should, in particular, look for ways to lower the barriers faced by special groups like the elderly, refugees, and asylees, as well as those who arrive in the United States with limited formal education.

At Risk Population Groups and the Citizenship Test

Pass rates on the four components of the U.S. citizenship test provide some insights into the effects of current testing standards on vulnerable populations and point to areas where clarification of test content and standards might facilitate an improved pass rate for all applicants by providing clearer guidance on how to prepare. While 93 percent of overall applicants were able to pass the civics and history test, fewer of them (86 percent) were able to pass the English speaking, reading, and writing tests.¹⁵ The differences among pass rates on the individual components of the test are magnified for the more vulnerable segments of the immigrant population. For instance, elderly immigrants were able to achieve an 88 percent pass rate on the civics and history test, but only 48.5 percent on the English tests. This may be because the civics and history content is clearly defined (applicants are asked ten questions from an official list of 96 questions and answers),¹⁶ and passing standards are the same for every applicant (at least six questions answered correctly).

The same cannot be said for the English components of the test. For the reading and writing (dictation) tests, examiners may use a set of randomly generated sentences from an official list of sample sentences, or they may use sentences of their own devising. Some examiners use sections of the N-400 application to test reading and writing ability even though this document rises well above the statutory level of “simple words and phrases in the English language.” When applicants cannot easily predict which sentences they will be asked to read or write, they are left with few clues as to how to study for these sections of the test. And since examiners are given rather vague standards as to what constitutes a passing score on the reading and writing tests, it is difficult for teachers to assess whether an applicant is sufficiently prepared for these tests.

Content and standards for the English speaking test are even less defined, and this is the portion of the test that presents the most difficulty to applicants. Overall, only 89.9 percent initially passed the English speaking test, compared to 93.2 percent who were able to pass the civics and history test.¹⁷ This lower pass rate may be because an applicant’s speaking ability is assessed through the process of reviewing the N-400 application in the course of an interview. Since the vocabulary and the language structures employed in the N-400 are well above the level of “simple words and phrases,” it is difficult for applicants (and their instructors) to know how to prepare for such a test. Without clear guidelines as to what constitutes a passing score on the speaking test, examiners (who do not have training in the field of second language assessment) are left to use their own discretion in determining which applicants demonstrate sufficient oral proficiency to meet naturalization requirements. This lack of standards makes it difficult for language instructors to accurately gauge their students’ readiness for the speaking test or even to pinpoint and remediate the problem when some, inevitably, fail.

Assessing Potential Citizens for Appropriate Levels of Service

In order to determine which type of service is appropriate for each potential citizen, it is important for educational programs (or collaborative groups of programs) to have some type of assessment tool in place. In citizenship education, appropriate assessment includes a determination of a student’s literacy, oral English skills, and civics knowledge relative to the demands of the test.¹⁸ As a condition of funding, all federally funded English as a second language (ESL) programs are required to use “valid and reliable” assessments for measuring achievement of literacy and language skills for adult students.¹⁹ Since many programs are now using such formal assessment measures, relying on them for placement decisions in a supplemental citizenship component is a simple matter.

But community-based organizations that offer stand-alone citizenship courses generally use in-house skill assessments that are less formal, less costly, not as time-consuming, and have the benefit of being tailored specifically for citizenship preparation purposes. For example, these assessments often present learners with a range of simple to complex civics questions and dictation sentences from the USCIS study guide. An in-house assessment may also present a range of predictable background information questions examiners ask in naturalization interviews and short reading samples with comprehension questions.²⁰

Often at the same time, programs conduct an intake interview to gather information on the student’s age, level of formal education, native language literacy skills, degree of English language training received since arrival in the United States, any current participation in other ESL programs, and any previous attempts at taking the citizenship test.²¹ In conjunction with the interview, eligibility screening for naturalization may be done to determine whether and when a person is eligible to apply or which stage of the naturalization process the student has already completed. In addition, information on potential barriers to participation (such as mobility problems, childcare issues, transportation or scheduling limitations), chronic medical or psychological conditions, and medications may be pertinent, particularly for elderly students. Bilingual staff, family members, or other volunteers are often needed in order to gather this information from students with low levels of English proficiency.²²

With the information gathered through this intake and assessment process, programs can make informed decisions as to the appropriate level of service to offer. For example, if an individual is able to answer interview questions easily, has no difficulty writing dictated sentences, and can read and answer questions about a written paragraph, the individual is an excellent candidate for a self-study course. Or if the intake and assessment reveal very low literacy skills, coupled with memory or cognitive difficulties due to a medical condition, a program might suggest pursuing a disability waiver rather than classroom instruction. A volunteer tutor is often the best choice for learners who demonstrate unusual disparities between their oral and written English skills, individuals who are homebound, or those who have other barriers to participation in classroom programs.

In order to maximize funding resources, citizenship programs and collaboratives should reserve classroom slots for those learners who are most likely to benefit from the service. In other words, instructional programs should target those learners for whom classroom instruction is likely to make a critical difference between success and failure on the citizenship test. High quality citizenship preparation programs are not always able to offer the full

range of service delivery options listed here, but they work hard to identify, coordinate with, and make referrals to other area providers who do.²³

Learner Characteristics

Learners who fall between the high beginning and low advanced oral and written English proficiency levels are likely to benefit most from a national citizenship program. According to descriptors in the National Reporting System (NRS) for Adult Basic Education, these learners can, at a minimum, “understand common words, simple phrases, and sentences that contain familiar vocabulary.” They can “respond to simple questions about personal everyday activities, using simple learned phrases, and can express immediate needs, using simple learned phrases or short sentences.” In terms of literacy skills, high beginners can “read most sight words...familiar phrases, and simple sentences.” And they “can write some simple sentences with limited vocabulary.”²⁴ Also included in this category are learners who have had no secondary education (many of these are elderly immigrants and refugees), since they are likely to be unfamiliar with concepts and vocabulary related to history and government (even in the native language). Given appropriate instruction, these learners have high potential to succeed with less than a year of targeted instruction.

Appropriate curriculum for this group includes civics vocabulary and concepts, oral and written language skill development, test taking skills, and interview preparation. Many learners in this proficiency range exhibit a high level of anxiety in formal testing situations, and it is critical for them to receive extensive practice and repetition of new skills and content. They also need access to quality instructional materials at a suitable level. In addition, the strategic use of native-language reinforcement is likely to facilitate concept development for these learners.²⁵ Some programs have found that opportunities to repeat a class cycle or to take a quick review class just before the naturalization test can improve the success rate for these learners. In addition to targeted test preparation, many programs find that civic participation activities serve to make instruction more meaningful, and these activities are central to the missions of many community-based organizations.

Self-study is not a viable option for learners who are not yet able to reinforce emerging oral skills through text. With little formal education, most learners in the high beginning to low advanced NRS ranges have not yet developed strategies for independent learning. In some cases, individuals in this group may need assistance in removing barriers to instruction, such as difficulties with transportation, scheduling, or childcare, or visual and auditory problems. Classroom or volunteer instruction can make a tremendous difference for these learners, and with additional application support services, they have excellent

potential for success in naturalization. Furthermore, when these at risk learners eventually succeed, they often inspire more reluctant individuals in their classes, workplaces, and neighborhoods to give it a try.

Ideally, citizenship learners receive conventional English language instruction and targeted citizenship preparation concurrently. However, immigrants with very limited time availability may find it difficult to participate in conventional adult education ESL classes over a period of many months. Learners with very limited time availability should have access to a short (20 to 30 hour), highly focused citizenship course, with the option of repeating the course if necessary, continuing to study with a volunteer tutor, or attending a quick review session just before their naturalization interviews.

Other populations worthy of attention in a national citizenship program are the learners at the beginning stages of oral English proficiency and those who have not yet developed literacy skills in English. A high proportion of these pre-citizenship learners are likely to be elderly immigrants and refugees. Some of them may also need assistance in removing barriers to participation (such as childcare and transportation). Often these learners have had little or no formal education, or they are minimally literate in a language that uses a non-Roman script (such as Arabic, Chinese, Khmer, or Hindi). Appropriate pre-citizenship curriculum for this group includes basic personal information, simple vocabulary, following instructions, and letter or sight word recognition and formation. As a precursor to citizenship instruction in English, it may be helpful for beginning level learners to have access to native language instruction in the basic concepts of history and government.

Learners who already possess basic English literacy skills are likely to progress to the high beginning stage of oral proficiency within one year of instruction and thus become appropriate candidates for targeted citizenship instruction. However, those who lack basic literacy skills may need more time. And although conventional ESL classroom instruction is offered in many communities, basic ESL literacy (language instruction for students who are not yet literate) is harder to find. A national citizenship initiative will need to explore ways of expanding access to services for ESL literacy learners. It is important to note that many beginning level learners, strongly motivated to achieve citizenship, have eventually become citizens, and with the aid of appropriate, long-term English language and literacy instruction, many more will be able to succeed.

One population group, those learners with advanced oral and written English proficiency, has high short-term potential for naturalization with very little need for instructional support. Generally these learners have at least some secondary education and have already succeeded at acquiring a high level of competency in oral and written English.

As a result, they are good candidates for a self-study citizenship course. Such a course should include clear information on the content, format, and standards of the test, ample practice material, and additional information on the application process. It should be free and widely available at community-based organizations, libraries, adult education programs, and on the Internet. It might take the form of a booklet, a software program, or an on-line distance learning program. Funders should provide incentives for citizenship providers to distribute self-study packets and have staff available to self-study learners who have questions, need application support, or desire a practice test or interview. If resources can be stretched far enough, classroom instruction would enable advanced level learners to gain a deeper understanding of the civics concepts, particularly through civic engagement activities.

Finally, it should be noted that a small percentage of immigrants may never be able to learn civics concepts or acquire English proficiency. Although they may make many attempts, they are impeded by cognitive processing difficulties or impaired memory function. This may be the result of a chronic illness, a disability, the effects of strong medication, or the normal aging process. In the case of refugees, it is sometimes the result of previous long-term malnutrition, head injuries, or severe trauma. Unfortunately, these immigrants struggle to gain documentation by physicians, which is required by USCIS to qualify for a disability waiver. Too often, students and teachers are not aware that such a waiver exists, or how to apply for it. While the medical aspects of documenting a disability go beyond the mission of educational providers, it is recommended that citizenship assistance programs network with legal service providers, medical clinics, or caseworkers to provide assistance to immigrants who cannot navigate the health care and legal systems themselves.

RECOMMENDATIONS:

- 1 Naturalization policymakers and test administrators should look for ways to lower the barriers to citizenship faced by special groups like the elderly, refugees and asylees, and those who arrive in the United States with limited formal education.
- 2 The Office of Citizenship should ensure that test content and evaluation standards are uniform and clear to all stakeholders—applicants, examiners, and instructional providers.
- 3 Instructional programs should have the capacity to provide information on the naturalization process to all learners, as part of the curriculum. Furthermore, instructional programs that lack the expertise to provide application assistance should strive to ensure that learners have easy access to partner organizations that do provide this service.

- 4 In order to maximize instructional resources across the spectrum of skill levels, citizenship preparation instructional providers (or provider networks) should make clear the levels of services they offer, according to the needs of various learner subgroups (such as self-study packets, classroom slots, volunteer tutors, or referrals to basic ESL literacy providers).
- 5 The Office of Citizenship or a contractor should develop and disseminate sample intakes, screening, and assessment devices for instructional programs. These materials should include guidance on the types of services appropriate for a variety of learner profiles.
- 6 Funders and provider networks should encourage programs that offer only one type of service to work in collaboration with other agencies to ensure that a broad range of instructional and scheduling options and application assistance is available (through mutual referral) within a given community.
- 7 In order to serve as many potential new citizens as possible, funders should implement measures to ensure that instructional providers target most of their resources on provision of services to learners who are most likely to benefit from intervention: those with high beginning to low advanced oral and written English language proficiency, those with less than six years of educational attainment, elderly and disabled learners, and those with anxiety issues. In other words, funders should avoid rewarding programs that selectively enroll learners with high levels of English language proficiency or high levels of educational attainment.
- 8 Funders, provider networks, and programs should work to ensure that classroom and volunteer services in basic ESL literacy are available to individuals who require more than one year of instruction to attain the necessary literacy and language proficiency levels for naturalization, and that an effective system is in place within the community to provide referrals for such students to qualified service providers.
- 9 Citizenship classroom instruction should strive to ensure that students with limited time availability have options for shorter term, highly focused citizenship test preparation instruction.
- 10 In order to maximize learners' chances of success at the USCIS interview, programs should design last minute instructional options for students who are within six weeks of a scheduled interview, such as the option to repeat an instructional cycle, attend special quick review courses, meet with a volunteer tutor, or participate in an individual practice interview.

Competencies for Citizenship Teachers

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Citizenship Advocacy Project

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Citizenship teachers need critical competencies in order to be effective in citizenship preparation instruction. The citizenship teacher, whether a certified teacher, a community volunteer, or a tutor, needs to be adequately trained in best ESL teaching practices and primary literacy issues to serve each student on the path to citizenship. Teachers must be familiar with current naturalization law and USCIS policies. Teachers need to be linked with legal and social service support systems in the community. Finally, the teacher needs to integrate the 96 official history and government questions into a broader problem-posing context that is relevant to the students' lives and needs.

Job Description of a Citizenship Teacher

The role and scope of a citizenship teacher may vary according to the specific needs of the hiring agency. Each agency's ESL and citizenship program should clearly define the responsibilities of the citizenship teacher before selecting a candidate. Teachers are often called on to fill a number of duties beyond giving classroom instruction, including training, supervising, coordinating volunteers, developing programs, and recruiting community support services. However, teachers should never be put in the position of giving specific legal advice or completing legal immigration forms for students.²⁶ Most programs expect the citizenship teacher to: 1) develop daily lesson plans, 2) follow course outlines, 3) integrate ESL strategies for relevant language development, 4) conduct ongoing assessments of student progress, 5) identify students with learning disabilities, 6) attend ESL and citizenship trainings and networking meetings, and 7) make appropriate legal and support service referrals. The teacher may be asked to administer English assessment tests at registration and give pre- and post-tests to students to document their progress. The citizenship teacher may also be asked to administer a course evaluation or exit test. In some agencies, the citizenship teacher will work closely with social workers or legal representatives to help students prepare for their interview and obtain individual tutoring for low-literate or special needs learners.

Desirable Skills of Citizenship Teachers

Host agencies of citizenship programs determine the qualifications for their citizenship teachers. Minimal requirements should be in place at all agencies. These include speaking English fluently, having experience in teaching English as a second language to adults, and training in current effective strategies for second language acquisition among adult learners. Some agencies may require an M.A. degree, a degree in linguistics, or a certificate in Teaching English to Speakers of Other Languages (TESOL). Alternatively, agencies may minimize these requirements and supplement the teacher's skills with extensive in-service trainings and workshops.

Citizenship teachers are most effective when they are committed to their students' success and engaged in innovative ways of making the class student centered. The teacher needs to create a welcoming and supportive classroom environment and be dynamic, enthusiastic, patient, and attentive. Student-centered teaching facilitates student-led activities and encourages students to explore new topics. Whether the teacher is foreign- or native-born, bilingual or monolingual, establishing rapport is the most important overarching teacher quality desired. Such teachers celebrate the victories of the students who pass their interviews and continue to work with those who have failed. The teacher is constantly conducting needs assessments and identifying barriers to student success. The teacher is skilled in networking with community-based organizations, advocacy groups, and government agencies and in making appropriate referrals. Lack of childcare, work schedules, transportation or legal problems, or lack of finances for necessary fees are considerations a sensitive and trained teacher keeps in mind. Consequently, a teacher may engage in advocacy in collaboration with other community organizations. The teacher is also skilled in working in a variety of alternative settings including libraries, churches, community centers, small groups, or individual homes.

Teaching to the Student Population Being Served

Best teaching practices vary depending on the students' abilities and motivations to become a citizen. The teacher should know the educational level of each student and past efforts to learn English. A class of students may include people who are semiliterate in their first language. Other students may be challenged with undiagnosed learning disabilities or apparent limits in hearing, vision, or physical or mental ability. In some settings, a teacher may be able to further customize the curriculum and teaching strategies to serve these distinctive students. For example, teachers

working with the Deaf Adults Education Access Program (DAEAP), which includes instruction using American Sign Language, have been able to meet the special needs of deaf students, particularly those who are elderly.²⁷

Students may demonstrate a propensity to be visual- or audio-focused learners or learn better by engaging in kinesthetic activities. Typical citizenship classrooms will have students from different countries and cultures unless organized specifically for one language or ethnic group. In addition, students will likely be of diverse ages and educational and economic backgrounds. Each student will bring his or her own perceptions about life in the United States and what it means to be a citizen. The teacher should address these issues within the context of the curriculum.

The teacher should learn why each student wants to become a citizen. Reasons typically fall into two categories—practical and sentimental. For example, in 1996, welfare reform passed by Congress made citizenship mandatory for access to key federal benefits.²⁸ This change made thousands of immigrants desperate to learn English, U.S. history, and civics to pass the required naturalization test for citizenship. The right to vote is also a significant practical benefit for many. A third practical reason is the desire to have a spouse or other relative immigrate. Sentimental reasons to become a citizen include the desire to “be an American” and to express attachment to this country.

Teaching ESL for Citizenship

The citizenship teacher must be skilled in key ESL techniques and practices that are linked to the naturalization process. USCIS interviews test a student’s ability to understand, speak, read, and write basic English. Students who have basic English may still fail the interview because they do not understand the vocabulary used on the N-400 form or they are unable to speak to the information they provided on the application form. Therefore, each lesson must have clear goals to help all students pass the test and interview. Because of varying skill levels of students, the time needed for preparation may range from as little as one or two classes to as long as one year or more.

The teacher’s role is primarily that of a facilitator of a large variety of practice activities that help students successfully prepare to respond to up to 96 possible questions taken from the N-400 citizenship application and to additional conversational questions covering such topics as the weather, traffic, and personal favorites. The instructor also prepares students for the dictation section of the USCIS interview that typically includes one to four sentences in English at a sixth grade level or lower.

Wherever possible, the teacher integrates the topics raised from the N-400 application with accompanying grammar constructs. Grammar constructs can be used to practice

responses regarding U.S. history and civics as well as occurrences in everyday life. For example, when asking, “**How often** do you go out of the United States?” the teacher can also ask, “**How often** do we elect the President?” When asking the students, “**Why did** you come to the United States?” the teacher can ask, “**Why did** the Pilgrims come to America?” These questions can lead to a discussion about students’ own migration to the United States, compared to the migration patterns and motivations of different immigrant groups.

Teachers also provide instruction in what English language skills and gestures to use when challenging situations arise in the naturalization interview. The teacher makes the class more relevant and student centered when eliciting from students strategies they often use when communication breaks down.

For the interview, students need to learn ways to gain clarification on what is being asked. For instance, “Did you say when or where?” or “Can you please repeat your question?” or “Can you say it again?” Students should be taught to relate to different examiners’ personality traits, such as examiners who make no eye contact while typing on the computer during the interview. Examiners may speak quickly or have accents, so students learn to listen critically for key words and phrases. They also learn how to use shortcuts in communicating their own information and ways to demonstrate that they understand the questions asked of them. Students can role play responses to different types of USCIS examiners, such as casual vs. formal, and to different speaking tones, pronunciations, and paces of speech. They can also discuss how to respond to an examiner who is rude in tone or manner.

Teaching Civics and History Lessons

Citizenship teachers need to have adequate knowledge of U.S. history and government. The teacher should have completed at least one secondary or college level class in history or government before teaching citizenship to adults. A teacher should also have a commitment to promoting a deeper understanding of both, beyond the 96 official test questions. A skilled teacher can teach complex ideas taken from great documents and speeches in U.S. history and simplify them for low-literate adults.

Techniques to teach history and civic participation include using crossnational comparisons, site visits, guest lectures, and student-led discussions of local issues and current events to broaden the scope of the class, while always relating the learning to the context of the actual USCIS interview. Instruction needs to motivate active learning in teams or pairs through simulated mock interviews, stimulating critical thinking and problem solving. For example,

students can work together in team activities that challenge them to apply amendments from the Bill of Rights to real-life situations. They can sort government service providers by level (federal, state, county, and city) and determine whom to contact when they need help with a problem. It is important for immigrants to understand American perspectives on key principles of government and historical events and to give them the opportunity to express their own perspectives.

Using Technology in the Classroom

Best teaching practices also include the use of technology in the classroom. Students are more engaged when multimedia is thoughtfully and carefully integrated into the class. Useful technology includes helpful Internet sites, computer-based citizenship software, and videos. Students can practice videotaping each other as they take turns role playing a USCIS examiner and applicant and watch the results for self-correction. Interactive videos that pause, allowing the student to answer questions, offer practical and effective opportunities to apply learned content and communication skills. Students eager to take advantage of computer language labs are then able to work at their own pace.

Knowledge of USCIS Rules and Local Practices

Citizenship teachers need to keep current with naturalization law, immigration forms, and fee schedules. Laws, regulations, and fees for naturalization, in addition to other immigration benefits, change significantly over time. Unfamiliarity with current laws and procedures will not only minimize a teacher's effectiveness but can result in a student's failure to pass a naturalization test, or worse, his or her placement in removal proceedings. For this reason, citizenship teachers should always refer students' immigration questions to a legal expert.

Teachers should also be familiar with varying practices at the local USCIS office. While USCIS may have national guidelines for their naturalization examiners, individual offices and personnel may interpret and apply them differently. It is critical that the citizenship teacher stay in communication with local community-based organizations and advocates who are well informed on these issues. Maintaining contact with staff in the office of a member of Congress is also a good resource for information and advocacy.

Occasionally, a student may fail a naturalization interview for seemingly inappropriate reasons. To learn of these problems promptly, teachers, in partnership with legal immigration representatives, can implement a follow-up system to contact students after a naturalization appoint-

ment. A system might involve a staff member making phone calls when students fail to report back after one week.²⁹ (Administrative appeals for final denials must be filed before one month of a denial notice.) Legal immigration experts can determine if the student should file an appeal with the USCIS. Some matters may require the advocacy of a local congressional representative.

Teacher Recruitment

Methods to recruit teachers depend on the skill sets desired. Teachers in adult public schools and community colleges are required to have a state teaching credential, so recruitment often takes place within the adult educational system. Frequently, existing adult ESL teachers are encouraged to become ESL and citizenship instructors when demand for a class arises or funding becomes available.

Other recruitment strategies include advertising in mainstream and ethnic media outlets for people with bilingual and teaching skills. Alternatively, educational programs will advertise with community-based organizations that provide social services, legal immigration counseling, and advocacy for immigrants. Announcements of job openings can be posted at state board of education offices, at teacher training facilities, and in publications related to English language training and linguistics.

Training for Citizenship Teachers

Training for citizenship teachers needs to be comprehensive even for certified ESL instructors due to the complexities of combining language instruction for multilevel learners and naturalization procedures. Institutionalized staff training is critical when there is a high turnover of teachers. Training is also important since teachers are often expected to function semiautonomously in the classroom with minimal supervision and few resources.³⁰

Formal training can be accessed from federal or state training programs. These programs often cover subjects of: current ESL teaching techniques for a multilevel classroom, learning styles of special needs students (such as the low literate and elderly), lesson planning, adult-based cooperative learning strategies, problem-solving and critical-thinking skill building, and educational program management. Mentoring is important particularly for new instructors. It gives the new instructor the opportunity to be observed by an experienced instructor and receive feedback based on accepted educational theories and proven techniques. "Shared insights enhance the quality of instruction."³¹

Community-based organizations can ask USCIS to provide training on naturalization law, forms, and procedures. Teachers should receive enough legal training to identify potential at-risk students and refer them to legal immigration representatives for legal counsel. (For example, a student who reveals that he or she has been out of the country for more than a year after getting a permanent resident card should seek legal advice before applying, or else run the risk of losing status in the United States.) Training that helps the teacher become better attuned to the student as a whole person with diverse needs and offers knowledge of the appropriate community resources for speakers and referrals is essential.

Staff development training should encourage innovation, leadership development, and collaboration. Ideally, training should be frequent and easily accessible for teachers of all skill levels. Trainings are also a good opportunity for teachers, legal representatives, and advocates to meet and share common concerns that, when addressed, improve citizenship services in the community. Training experiences can lead to the establishment of collaborations resulting in “the sharing of effective practices and an efficient division of labor based on areas of expertise.”³²

Volunteers

Trained volunteers can be very useful as teacher aides and tutors with small groups and individual students, particularly those who are homebound. Bilingual tutors can be very helpful with students who speak limited English and need some instruction in their native language. With supervision, volunteers may teach classes, thereby giving a program coordinator or lead teacher time for learners with special needs or broader program issues. While volunteers are an important and enriching resource, especially for programs with limited funding, they are less reliable and apt to be absent or quit. Contingency plans are needed to cope with this limitation.

Recruiting Volunteer Teacher Aides and Tutors

An often overlooked resource for volunteers is immigrants who have recently passed the naturalization exam with limited classroom assistance or who were former students of a citizenship class. Other possible volunteers include retired teachers, librarians, community service organization staff, members of religious congregations, and skilled and mature high school or university students.

Volunteers can be recruited through personal outreach, organizational flyers or publications, media advertisements, or contacts with community educational, civic, or faith-

based groups. Volunteer recruitment flyers can be distributed at gathering places for seniors or in publications for retired persons.

Volunteer Teacher Aide and Tutor Screening

Every organization needs to screen prospective volunteers carefully. The goal is to find a good match between a tutor who is patient, culturally sensitive, and willing to be trained and a small group of motivated students. A supervisory teacher should check in with students who have individual tutors to gauge the student’s progress and acceptance of the tutor. At times, volunteers may disregard the program’s goals and course material and set their own course. As when selecting a professional teacher, an agency assigning volunteers to students needs to seek references, work history, and educational background, and discern the volunteer’s motivation. Screening can also include getting information about the candidate’s previous volunteer experience, crosscultural experience, other language skills, hobbies, and volunteer assignment preferences. Heeding volunteer preferences will promote volunteer retention.

Training for Volunteers and Tutors

Volunteers and tutors need a comprehensive orientation and ongoing training and support throughout their work experience. The initial orientation helps give them a common knowledge base of the program’s goals and students’ learning needs. An orientation program should not be too lengthy or require too many appointments, thwarting volunteer recruitment. Orientation includes a written job description with discrete duties, and program and agency policies and procedures, such as maintaining confidentiality. It is helpful for the supervisor-volunteer-student relationship to have a volunteer sign an agreement specifying length of service and what to do if he or she must cancel a class or tutor appointment.

Volunteers need to learn in orientation of training opportunities available to them in the host agency or elsewhere. Supervisors can meet one-on-one with volunteers on a regularly scheduled basis. Alternatively, they can maintain regular phone contact and written communication. Workshops on specific topics of interest to volunteers should be offered in-house or outside the agency to demonstrate appreciation and a commitment to their skill development. “Continuing volunteer education training enhances program quality while giving volunteers the support needed to encourage retention.”³³

Volunteer Mentors

Educational agencies are wise to recruit and train volunteers as mentors for special needs students. Mentors can be selected from former students who became citizens, civic leaders in the community, nonimmediate family members, or caregivers for those who have disabilities. Mentors, like tutors, coach students through the naturalization process, helping them stay motivated and confident. Mentors can help with class work and home work and respond to individual student's questions or concerns about the citizenship process. Mentors are usually assigned to work with one student due to the time commitment.

RECOMMENDATIONS:

- 1 The Office of Citizenship should provide free, training-of-the-trainers workshops using its staff or trainers working under a technical assistance grant. Trainings should be offered to develop in each state a cadre of professionals who, in turn, lead local and statewide trainings for paid and volunteer citizenship teachers at the grassroots level. Coordinated national training will enable teachers to use the most successful strategies in preparing students across the country to achieve U.S. citizenship.
- 2 Departments of Education in each state should offer training to paid and volunteer teachers at community-based organizations on best ESL instruction practices, incorporating the unique teaching methods and content for citizenship classes.
- 3 Citizenship educational programs should establish clear guidelines for citizenship teacher qualifications. Specifically, the candidate must speak English fluently, demonstrate experience or training in teaching ESL to adults, and have completed at least one secondary or college level class in U.S. history and government.
- 4 Citizenship educational programs should offer comprehensive training, including start-up orientation, ongoing supervision, and access to special workshops. Training should be formally integrated into a broader plan of staff development in order to offer high quality citizenship instruction.
- 5 Citizenship educational programs should provide teachers with immigration resources to understand the naturalization application process and legal needs of the students. Programs should establish guidelines helping teachers to know their limits in explaining legal immigration matters in a classroom setting or with individual students. Up-to-date referral lists of charitable immigration programs recognized by the Board of Immigration Appeals (BIA) should be provided to teachers and students.

- 6 Citizenship teachers should customize their instructional settings and curriculum to the needs of their students. Teachers can use innovative approaches in helping students with special physical, educational, and economic needs.
- 7 Citizenship teachers should incorporate technology into the classroom by using helpful Internet sites, videos, and other audiovisual resources. Exposing students to new technologies can better prepare them for future job prospects and for assisting their children with schoolwork.
- 8 In order to help students become more informed, empowered, and engaged citizens, citizenship teachers should provide them with activities that foster deeper understanding of U.S. history and government beyond the required 96 questions.
- 9 Citizenship teachers should empower students to access community resources, government agencies, and elected officials to their advantage. Students can be asked to select places from where guest speakers can be invited to a citizenship class to address topics that will connect students with new information and resources for themselves and their families.
- 10 Citizenship teachers should be encouraged and given time to network with other community service providers, congressional aides, and volunteer associations to strengthen the program. Specifically, teachers need to be linked to community advocates in order to learn about pending or passed legislation that impacts immigrants generally and students in class specifically. Students in class are a target audience for legislative advocacy information.
- 11 Citizenship educational programs should regularly seek support from volunteers as aides, tutors, or mentors. Volunteers should be given formal mechanisms to offer feedback to the host educational agency. Educational agencies should give volunteers recognition, including training, with hopes of making them paid staff on a full- or part-time basis.

ESL and Citizenship Program Models

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An ESL and citizenship program is designed with the optimistic perspective that all immigrants are on a path to citizenship. A national citizenship program's success in hastening, increasing, and sustaining naturalization increases when educational and legal support systems help immigrants get on and stay on a path to citizenship, beginning at the time of arrival to this country.

A new immigrant to the United States is faced with an overwhelming array of challenges and opportunities, particularly immigrants with special needs, including those with low income, the elderly, the disabled, those with limited English proficiency, refugees, and asylees. Becoming a U.S. citizen through the naturalization process may be an immigrant's dream, but rather than identifying eligibility requirements and benefits soon after gaining lawful permanent residence, it is viewed as a distant, long-term goal. An ESL and citizenship program promotes the path to citizenship as a means of facilitating acculturation and integration by educating Lawful Permanent Residents about the eligibility requirements and benefits of obtaining citizenship early on.

Newly arriving immigrants are better able to meet and maintain naturalization eligibility when offered information and technical legal and educational supports early in the resettlement process. The USCIS and the Office of Citizenship in Washington, D.C., and district offices across the country need to establish and implement public-private partnerships among state and city governments, ESL and citizenship programs, charitable legal immigration programs, adult secondary schools and community colleges, social service agencies, employers and workplace development programs, religious organizations, and public facilities, such as libraries and community centers, to ensure timely access to naturalization information and assistance. Currently, the USCIS and its Office of Citizenship lack a method to systematically identify immigrants early in their residency and direct them to a full spectrum of citizenship services.

Collaboration among public and private organizations to assist new immigrants can lead to cost effective, non-duplicative services that ultimately support successful integration and naturalization. ESL and citizenship programs create an opportunity to promote a variety of immigration and integration issues beyond providing language acquisition instruction and naturalization test preparation courses. It is common for an ESL and citizenship teacher to be confronted by students of varying levels of integration and general life challenges. The student is well served and ultimately supported in his or her goal to become a U.S. citizen when teachers are trained to respond to the whole person through a social service perspective and are involved in referral relationships with social service providers.³⁴ (Teachers helping students review and study up to 96 questions and answers on the naturalization application may find they reveal, directly or indirectly, personal information that highlights their integration challenges.)

Components of an ESL and Citizenship Program

The ESL and citizenship program is ultimately part of a broad, comprehensive approach supporting the path to citizenship and links with these immigrant service components:

- Charitable legal immigration services providing screening for and completion of the Application for Naturalization (N-400) and accompanying documentation. Included is case management of the naturalization applicant starting with submission of the N-400 and lasting until the taking of the oath of allegiance. Case management involves tracking applicant's progress overcoming barriers to naturalization, data collection, and assessing the determinants in passing or failing a naturalization test and interview.
- Refugee resettlement programs;
- ESL, ESL/civics, and ESL/citizenship preparation classes, including mock naturalization interview preparation courses;
- Immigrant-focused social service agencies with a mission to facilitate immigrant employment, health, and education; and
- Community-based civic participation initiatives helping immigrants, prior to or after gaining citizenship status, to address local issues of concern. Activities might include community organizing for social change, testifying at public hearings, voter registration and voter turnout, and volunteer recruitment for charitable or political events.

Needs Assessment of Target Population

ESL and citizenship programs are rooted in information from a communitywide needs assessment of the targeted client population. Immigrant-focused community-based organizations may serve all immigrants regardless of race, religion, nationality, or ethnicity. This is also true of publicly funded adult education programs. Alternatively, they may seek to serve a specific ethnic group with staff reflecting the same backgrounds. In either case:

“Effective needs assessments generally focus on two levels: (1) community needs, defined in collaboration with other agencies serving the same group or community and (2) client or learner needs, collected through demographic data, focus groups, interviews, and surveys. Community needs assessment tends to focus on indicators such as employment and health issues, literacy and poverty rates, ethnic diversity, numbers of persons eligible to apply for naturalization, and other socio-economic indicators. Client needs assessment tends to focus on targeted learner

groups. Learner needs assessments may seek to establish reasons the targeted learners want to naturalize, their oral and literacy proficiency in English and the native language, when and where learners could benefit from using English in their daily lives, and where they currently use the target language. Life circumstances (age, employment, child care issues) are often examined as well, along with any special factors (such as trauma) that might impede or contribute to success.³⁵

Designing ESL and citizenship programs to the special needs of vulnerable students in and outside the classroom contributes to the potential success of the citizenship applicant. A tailored program design may: offer classes that are free or low-cost for low-income students, offer multiple locations and hours for convenience, be accessible to public or volunteer-supported transportation, and provide childcare. Determining these needs in advance through community assessment and student intake helps program managers identify gaps in services, duplication of services, and shared service among partnering agencies.

Menu of Program Choices

A menu of ESL and citizenship services should be available in all communities participating in a national citizenship program. They should be available from a cluster of community-based organizations, or preferably, from one program providing comprehensive services for its target population. Program choices arise from the tested English levels of learners with high probability to naturalize given supportive services. English levels frequently served in ESL and citizenship classes include:

- Beginning stages of oral English proficiency,
- High beginning and low advanced oral and written English proficiency levels, and
- Advanced oral and written English proficiency.

Programs may offer classroom-based instruction, individual tutoring within an open classroom, intensive in-home tutoring, one-shot seminars or reviews of a few hours, mock naturalization test preparation courses, and self-study materials. Creative programs may seek to offer ESL and citizenship instruction briefly through workplace ESL training funded by state and local governments seeking to bridge specific career paths through vocational ESL instruction.³⁶

Programs may offer a specific citizenship course in a native language for immigrants eligible to take the naturalization test in a non-English language because they meet extended age and residency requirements. Such students still need the program options and services mentioned above but with instruction in a first language. Students with physical and

mental disabilities or psychological impairments may be exempt from taking the naturalization test altogether by having USCIS approve a Medical Certification for Disability Exceptions (N-648), but still need assistance with interview preparation in their native language.

Collaboration among service providers facilitates referral and allows for accommodating a variety of student needs. “By working together, these collaborations encourage sharing of effective practices and an efficient division of labor based on areas of expertise.”³⁷

Effective ESL and citizenship programs use instructional tools to assess student’s progress in learning English, knowledge of civics and history, and skills for a naturalization interview. Standardized assessment tools, implemented at the beginning, middle, and end of the learning process, are essential for teacher and student feedback and provide motivation for student retention. Utilization of the mock or practice interview is appropriate for both initial assessment and the final evaluation of test and interview readiness. In addition to student evaluation, assessment provides valuable information for program adaptation where needed. Teacher evaluations by students in English and native languages are an important and respectful, but often overlooked, tool for program improvements.

Outreach and Promotion

An optimal citizenship program connects early with all newly arrived immigrants and maintains contact throughout the first five years of residency. During this period, immigrants receive information about eligibility requirements and referrals to supportive services for citizenship preparation. Theoretically, this proactive approach minimizes the need for targeted outreach later when residency eligibility is finally achieved. In addition, early contact with information and referrals helps prevent activities that will make someone permanently or conditionally ineligible. Currently, the federal government has no system alone or in partnership with community-based organizations for early contact. An exception is the refugee resettlement program, in which sponsoring agencies conduct early arrival orientation, and information about eligibility requirements and benefits of citizenship can be easily offered. However, there should be more uniformity in how refugee resettlement agencies help prepare refugee clients, with eligibility information, adjustment of status applications, and ESL and citizenship classes throughout the first five years of residency, as well as naturalization application assistance at the earliest possible date.

To achieve this proactive model, community-based organizations need federal, state, and philanthropic support to reach potential students through culturally and linguistically appropriate venues, including immigrant housing centers,

schools, places of worship, social service agencies, health care facilities, community centers, and worksites. Outreach tools include flyers, posters, brochures, ethnic radio and television announcements, and ethnic print media stories and advertisements. Program managers should ensure that vulnerable populations, such as the elderly, the disabled, women at home, shut-ins, low literate adults, and nationalities that naturalize at low rates, are not overlooked.

From the late 1990s until 2005, immigrants could expect USCIS to take up to 16 months to process a naturalization application. This extended waiting period offered limited English speakers more time to study English, U.S. history, and civics. In 2006 USCIS is able to schedule a test and interview in ten months or less after receiving an application. Thus, students requiring classroom study must preferably do so before an application is filed, or at the least, immediately thereafter. Early preparation is a goal of outreach for vulnerable populations.

Citizenship program managers can assess the effectiveness of outreach strategies by asking, tallying, and analyzing how each student or applicant learned about the program's services. Teachers or intake workers can ask students and applicants for ideas for new outreach methods. Celebrating a student's success in becoming a citizen before an audience of family, neighbors, friends, and coworkers is an excellent outreach strategy, as is the normal word-of-mouth advertisement that successful students send when they pass the naturalization test and take the oath of allegiance.

Civic Participation and ESL/Citizenship

ESL and citizenship program managers have many responsibilities: to fund a program; hire, retain, and train staff; implement a comprehensive outreach strategy; and ensure student success and satisfaction. In addition to these duties, they need to capitalize on the ideal setting available to teach immigrants community participation and civic engagement. These activities are included in a curriculum that teaches the individual and collective benefits of citizenship and the measures of responsible citizenship. Indeed, the United States has a century-long history of pairing English language instruction with civics education. The immigrant-assistance community needs to learn the positive lessons of this tradition and infuse its services with new ideas that promote integration at these sophisticated levels. In 2006 federal funds are available to states as grants to community colleges, adult basic education programs, and community-based organizations to teach English literacy and civics education.³⁸

While citizenship preparation focuses on completing the naturalization process, civic participation education focuses on:

“the way that members of a community interact with the social, political, and educational structures around them. ... assisting learners to understand how and why to become informed participants in their communities. A key element of civic participation education for adult English language learners is that learning needs to have real-life consequences. One of its purposes is for learners to become active in community life. For example, learners might collaborate to fight for a community improvement, learn about and participate in the American electoral system (if appropriate), or join the local Parent Teacher Association (PTA).”³⁹

ESL/civics and ESL/citizenship curricula often have purposes, students, and content in common. Yet federal to state funding for ESL/civics instruction is not consistently linked to the naturalization process. Citizenship classes are also not necessarily infused with the right level or balance of civics for the needs of adult learners. The two program models and overlapping student populations need to be better understood by funders and providers. The challenge is for both to meet the student's learning goals while also teaching beyond the curricula or test for civic learning and engagement purposes as students desire.

Linking Students to Application Assistance and Legal Case Management

“Teachers must distinguish between the educational and the legal aspects of citizenship preparation.”⁴⁰ Aliza Becker, citizenship curricula author, and Marketa Lindt, immigration attorney, describe the following elements of the citizenship teacher's role: “Teaching the benefits of citizenship; education about the naturalization process; preparation for the oral and written exams including teaching language skills, culture, content, test-taking strategies, and instilling confidence; empowerment; and *referrals* for legal advice. It is important that the teacher not assume the role of legal advisor ...”⁴¹

Citizenship students are best served when teachers and legal immigration counselors collaborate. Collaboration can occur between departments of one agency or different agencies offering these separate services. Too often, citizenship students only receive eligibility review and application assistance from teachers without the benefit of legal expertise. The applicant is left to manage the steps of the naturalization process without further assistance. Under these circumstances, the ESL and citizenship teacher can

serve as a liaison between the student and legal immigration referral source, a private immigration attorney, or charitable legal immigration program.

Comprehensive legal immigration assistance for naturalization must include: 1) initial legal screening or intake, 2) assessment of all eligibility requirements ending with taking the oath of allegiance, 3) thorough explanation of consequences to every answer on the application, 4) identification of barriers or temporary ineligibilities that can be overcome, 5) identification of permanent ineligibilities that require the applicant to not apply or withdraw an application, and 6) legal representation before USCIS if needed. Legal representation can help an applicant resolve problems of delays or improper adjudication by USCIS. Legal counselors may be attorneys or BIA-accredited representatives working for a nonprofit, charitable agency. Both types of counselors must be familiar with immigration law, specifically naturalization, and the practices of the local USCIS office.

The lack of legal immigration consultation and application assistance leaves applicants at risk of unexpected, undesired consequences, which can fall into three denial categories. First, an applicant may be determined ineligible by USCIS due to a deficiency, like insufficient language ability that needs to be improved, and lose the \$400 filing fee. Second, an applicant may be determined ineligible due to lacking good moral character, evidenced by lack of paying child support or taxes, and be unable to reapply for a five year period. Third, and most consequential, is when an applicant is determined permanently ineligible, often because of committing a major legal offense or “aggravated felony,” resulting in the applicant being immediately placed in removal proceedings.

ESL and citizenship teachers and BIA-accredited representatives are natural allies based on their shared mission to serve needy people in the community, specifically the foreign-born. A national citizenship program will help forge stronger programmatic ties providing comprehensive, wrap-around services. This alliance will require a greater degree of case management between providers. The result of greater collaboration and case management should be a higher naturalization and approval rate for vulnerable immigrants.

Post-Naturalization Follow Up: A Celebration of New Citizens

A comprehensive ESL and citizenship program views the path to citizenship as extending beyond an applicant taking the oath of allegiance. However, follow-up with a student after filing an application is challenging. Applicants who pass through the naturalization process with general ease rarely keep in touch with their teacher or legal counselor. More typically, it is an applicant experiencing delays or

unnoticed eligibility problems who initiates contact. Even so, a student may not consistently notify a teacher or counselor after the problem is resolved.

This scenario makes case management systems all the more important. Students can be given token incentives to confirm their citizenship status, or outreach workers can make phone calls to confirm it. An option is for funders to give programs a small monetary bonus for documenting each student’s receipt of a naturalization certificate. (The state of Florida’s Refugee Naturalization Project from 2000 to 2003 offered its grantees a \$60 bonus for each client completing a naturalization oath.)

Hundreds of thousands of immigrants become citizens under the radar of community awareness. Obtaining citizenship status should be a public celebration in the classroom and in other community settings, especially when immigrants have labored many hours to study. Community-based organizations should institutionalize recognition of new citizens by partnering with USCIS and federal courts to bring guest speakers to naturalization oath ceremonies, distribute important public information, complete passport applications and voter registration cards, and refer people to civic engagement and volunteer opportunities. In addition, community-based organizations can host separate parties for its graduating students with current students in attendance. Inviting successful citizenship students back to the classroom provides an ideal occasion to recognize the new citizen and offer role models to ongoing students. Ultimately, new citizens become the best outreach workers and spokespersons on the benefits of citizenship.

Funding and Sustainability

Students with limited English proficiency may require one year to complete an ESL and citizenship class, and longer, for literacy development. Therefore, funding for these programs must be long term and sufficient to support and sustain the multiple services required to implement a comprehensive ESL and citizenship program. Historically, state and private funding sources have carried the primary responsibility for such services, while federal funding has been minimal. In 2006 the Department of Education’s ESL/civics education program provides up to \$70 million for community colleges, adult basic education programs, and less frequently, community-based organizations.

Illinois has served as a national model in promoting the acculturation and ultimately the naturalization of its immigrant residents. In 1995 the Illinois Department of Human Services established the Refugee and Immigrant Citizenship Initiative (RICI). More than a decade later, Illinois continues to support ESL and citizenship service providers through RICI funds. Also funded under the auspices of the Illinois Department of Human Services is a second project, the New Americans Initiative (NAI). The

NAI is a targeted campaign of outreach, education, and application assistance focused on reaching the 348,000 Lawful Permanent Residents in Illinois who are currently eligible to apply to become citizens and the 142,000 who will become eligible in the near future.⁴²

Each Illinois program promotes collaboration among educators, community-based organizations, and charitable legal immigration providers in order to avoid unnecessary duplication, share expertise, and provide technical assistance. Ample and sustained funding is needed to develop a comprehensive citizenship service infrastructure at the local level. Currently this infrastructure encompasses a targeted outreach to ethnic communities and includes a paid media campaign, paid professional training and development for teachers, volunteers and program managers, technical assistance to educators and community-based organizations, and funding for the development of standardized materials that incorporate program and curriculum standards.⁴³

On the federal, state, and city level, funding for workforce development has typically focused on vocational training. Innovative programming could be designed to extend ongoing support to the immigrant in the workforce by funding coordination between the workforce development system and the adult education system.⁴⁴ Such programming would incorporate ESL training with job skills training, job readiness assistance, vocational education, and ultimately citizenship preparation.

On some level, the federal government through the Office of Citizenship is obliged to support ESL and citizenship programming, if not through direct funding, then through its own production of supportive materials. Bilingual outreach and education materials about the importance of civic participation and naturalization can be made available through printed and web-based formats. With the pending implementation of the revised citizenship test, the role of the Office of Citizenship and federal funding for revision of programming at the local levels will be critical.

Local and national private foundations, working to support acculturation of immigrants, coalition building of diverse populations, and education of the underprivileged, are also potential resources for ESL and citizenship program funding. In the past ten years, private funders created initiatives, such as the Fund for Immigrants and Refugees and the Emma Lazarus Fund, specifically for support of immigrant and refugee concerns. Larger foundations, such as the Fannie Mae Foundation, the Ford Foundation, the Carnegie Foundation, and the Joyce Foundation have dedicated substantial financial support for citizenship-related projects in the past.

ESL and citizenship programs must be creative in cultivating new funding sources that support civic participation, diversity, adult education, workforce development, and acculturation of immigrants. Program managers must be prepared to advocate for funding by putting a human face on the aspiring new citizen and demonstrating successful outcomes from collaborative efforts to provide ESL and citizenship assistance.

Programs must capitalize on national developments that impact immigrants, such as the current immigration policy debate, and be prepared to frame the need for ESL and citizenship funding in just such a context. According to the newspaper, *The Post and Courier*, in Charleston, N.C., the prospect of immigration reform and attention to illegal immigration has been a motivator for many eligible Lawful Permanent Residents, who have put off applying for naturalization and are now recognizing the importance of voting to impact the policies that affect their lives personally:

Efforts by Congress and local governments to crack down on illegal immigration—and the protests that followed those efforts—have produced a surge of interest in learning how to become a U.S. citizen.

More of the nation's 8 million legal immigrants are showing up at citizenship classes and seminars sponsored by churches and community groups.

... Applications for naturalization have increased since December, when the House bill was approved. The Homeland Security Department received 53,390 applications for naturalization in January, 23 percent more than the same month a year earlier. In February, that number rose to 57,056.

... The department's Citizenship and Immigration Services office also saw a record number of visits to its Web site in March and is experiencing heavy downloads of immigration forms, including 162,000 naturalization forms, said spokesman Christopher Bentley.⁴⁵

ESL and citizenship programs, which are currently challenged to compete for fewer dollars, must appeal to the common goal of more fully integrating the foreign-born into American society. Keeping funders informed about program accomplishments and involving funders in program activities such as ESL and citizenship classes and naturalization oath ceremonies can help to demonstrate directly how funding impacts the individual, the community, and the country. In addition, funders can become spokesmen and advocates about the need for expanded ESL and citizenship programming and for the additional dollars to implement these programs.

RECOMMENDATIONS:

- 1 ESL and citizenship programs should support and facilitate the path to citizenship through early outreach and education to Lawful Permanent Residents about the eligibility requirements and benefits of obtaining citizenship.
- 2 ESL and citizenship programs need to create an opportunity to identify a variety of immigration and acculturation issues beyond language acquisition and citizenship preparation. For instance, teachers are trained to respond to the whole person through a social services perspective.
- 3 In addition to test and interview preparation, ESL and citizenship program curriculum should be designed to encourage and support civic participation as an integral part of becoming an active and responsible citizen.
- 4 ESL and citizenship programs and teachers must network with community-based organizations or legal immigration programs, as well as local USCIS offices, to stay up-to-date on all naturalization laws, regulations, and procedures, and join in local and national advocacy efforts.
- 5 ESL and citizenship programs should partner with community-based organizations or legal immigration programs to provide case management and oversight of the citizenship application process—from assistance with completing the application, to legal support, to citizenship preparation services, to interview and ultimately oath—with supportive intervention and assistance at any point when needed.
- 6 ESL and citizenship programs should offer affordable and accessible classes with a wide variety of schedules and locations, supported by public or volunteer transportation and childcare services.
- 7 Various ESL and citizenship program modes should be available, including classroom settings, individual intensive tutoring, one-shot seminars and reviews, and stand-alone practice interviews to accommodate a variety of student needs.
- 8 ESL and citizenship programs should provide classroom or out-of-the-classroom volunteer services in basic ESL literacy to help individuals with longer term potential for attaining citizenship. (Volunteer recruitment is an opportunity to match naturalized and native-born citizens with future citizens.) Learners outside the classroom should be tracked under a case management system to ensure that citizenship is achievable at the next scheduled naturalization interview.
- 9 Volunteers as well as paid teachers should be trained and supervised to ensure quality service and maximum utilization in a variety of settings.

In-Class Curricula Priorities for Integrated Citizenship Program Models

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The criteria for becoming a citizen are written in U.S. law and regulation and are the same regardless of where an immigrant resides; yet the naturalization exam is administered differently among USCIS district offices. Even more different is the variety of citizenship preparation programs across the country. Some programs are stand-alone citizenship classes while others also include basic and intermediate levels of English as a second language instruction. Since ability in reading, writing, and speaking a basic level of English is a major criterion to become a citizen, English as a second language instruction needs to be integrated with citizenship preparation.

Three initiatives will help create integrated citizenship program models. First, there needs to be a standardized naturalization exam. Second, there needs to be a national citizenship curriculum. Third, there needs to be a national citizenship program providing funding, instructional materials, and technical support to create integration citizenship instruction programs.

Most learners studying for their naturalization test typically do not enroll in citizenship classes until shortly before their scheduled interview with the USCIS. Even if learners have an extended period of time to prepare for the exam, they are primarily interested in studying topics on the test. The curriculum must first and foremost address learner needs to know: 1) all naturalization test questions and answers, 2) the meaning of the oath of allegiance, 3) skills to pass the English requirements, and 4) legal and administrative details about the naturalization test as it pertains to their specific case. While curricula should attempt to include broad information supportive of immigrant integration and civic engagement, it must chiefly support the learning needs of adult learners who wish to become citizens. Curriculum writers and instructors must always bear in mind that adult learners must see the relevance of what they are studying to the goals in their everyday lives.

Early preparation for the naturalization exam is likely to become more important to immigrants and teachers. The USCIS may require Lawful Permanent Residents in the future to pass the naturalization test before filing an application for citizenship and receiving a scheduled interview. USCIS's current practice is to have them file an application and receive a scheduled naturalization

interview, at which time the test is also conducted. USCIS expects to achieve greater efficiency in its application processing through upfront testing by screening out people in advance who cannot pass the test and fail to meet the necessary requirements.

Upfront testing would require Lawful Permanent Residents to study naturalization test material in advance of filing an application. No longer could they depend on filing an application, triggering an expected interview date, to begin studying. This reverse process will place more responsibility on Lawful Permanent Residents and community-based organizations providing citizenship services to prompt people to enroll in citizenship classes. Outreach for citizenship will become even more important than today, thus creating a greater need for a national citizenship program to be implemented.

Currently, the naturalization test includes content on the history and government of the United States, including local government, reflected in 96 open-ended questions. The test also includes questions dictated to the applicant to examine English comprehension, and oral and writing skills. The test for comprehension and oral skills also includes questions taken from the 12 parts of the N-400 application form.

Classroom curricula should include many oral exercises since the testing format requires considerable oral skills. For beginning learners, one of the most difficult parts of the citizenship exam is responding orally to multiple questions about the information on the N-400 application. Therefore, the curricula should teach vocabulary that relates directly to the answers and responses associated with the N-400 application form.

In addition to containing specific content related to the citizenship exam, the curricula should focus on the skills needed for effective performance on the test. Although knowing all the necessary history and government information, the learner may struggle to understand the questions asked orally and to articulate the answers, at the risk of failing the exam. Perhaps the two most important skills are listening and speaking, since the bulk of the exam is an oral interview. Citizenship curricula should include, for example, multiple exercises in which students have to interpret the differences between “Wh” questions, such as: “**When** was the Declaration of Independence signed?” “**Where** was the document signed?”

Pronunciation is another critical skill that needs to be taught, particularly how to adjust one’s intonation when not understood. To prepare learners for testing of reading comprehension and for writing answers in a multiple choice exam, reading and test taking skills need to be part of the curricula. Writing from dictation is another skill that must be taught.

Another skill required in a curriculum is interpersonal communication to respond to different characteristics of USCIS examiners. Some are friendly and casual in their demeanor. Others are less friendly in their tone and posture. If the examiners do not make eye contact or face the applicants when they are asking questions, the applicants may have difficulty comprehending what the examiners are asking them because they cannot see their lips. The applicants may also misunderstand the formality of the examiners and think that the examiners do not like them when actually the examiners are following standardized procedures required of all examiners.

Cultural differences may also mislead the examiners. In some cultures, it is very impolite to look people of authority in the eye and more polite to look down. If an applicant does this, the examiner may think the applicant is hiding something or being disrespectful. Applicants will have a much better chance of passing the exam when teachers include a review of cultural differences in interview protocol and practice appropriate body language and interview skills.

Teaching communication strategies is also very important because they are vehicles for maintaining conversations and improving communication. For example, students need to study the language patterns for requesting clarification, such as: “Did you say when or where?” Learners need to know how to introduce themselves and use small talk on everyday topics during the interview. They need to know the language patterns for defining terminology or explaining concepts. Sometimes examiners will say, “Can you explain what that means?” Students need to say, “‘Bear arms’ means to fight for my country.” Knowing nonverbal language to clarify meaning also is helpful. When examiners ask what an “oath” is, applicants can demonstrate that by raising their right hand as they explain the term. The function of reporting events in the past is important. The learner frequently has to relate personal history or a sequence of past events. As a result, the exercise of describing a series of events in the past tense needs to be part of the curricula.

Many learners with restricted English speaking, reading and writing abilities often lack basic literacy skills in their native language because of their limited educational backgrounds or lack of sufficient experience with a non-Roman alphabet. Curricula for these learners needs to include materials and exercises that build literacy and handwriting skills. Exercises appropriate for these learners include building citizenship-related vocabulary words, copying sentences on a line, and taking dictation of spoken sentences. Strategies for sounding out words by decoding letters and sounds, such as consonants or short and long vowels, are also helpful.

Since learners with limited literacy skills are usually few in number in a citizenship class, preparation materials need to be leveled so that less literate learners can progress in a multilevel class. With materials at different literacy levels, the teacher can group students with similar abilities together or have cross-ability groups where higher level students are paired with less literate students and help these students as needed. Teachers cannot always teach these literacy skills directly in a multilevel class; the curriculum materials need to be designed for individual use as well as for whole class instruction. Magnetic card readers are useful in a multilevel class. Lower level students can slide flash cards with words through the magnetic reader, hearing the word and seeing it, and then recording their own voices. By using headphones, this activity does not disturb the rest of the class.

Learners in citizenship classes often lack one or more of the skills above. Therefore, they may lack confidence in themselves to further their studies and quit, or they may be extremely anxious about taking the exam. Instruction should identify learner strengths and take steps to build personal confidence. Practice or mock interviews and tests are very important to give learners a nonconsequential experience in taking the exam. It is important for learners to know the high pass rate for the exam, especially on the second attempt, even for low literate learners who study.

Citizenship curricula also need to be designed to accommodate a variety of delivery modes. Besides whole class instruction, learners can be assigned one-on-one or in pairs to a tutor. Tutors can continue their assistance outside of the classroom. Another possibility is an individualized language lab in which a learner studies alone on a computer, using a cassette player and earphones, through distance education models or via an online class. If learners are studying through a distance education model, they may come to school only to check out materials every week and return to the school only for brief progress checks with an instructor or aide. Materials for this mode of delivery need to include specific directions on how to study the lessons and what exercises to complete to demonstrate comprehension of the content. Obviously, these models require a variety of take-home materials: flash cards, audio cassette tapes or CDs, videos or DVDs, and web-based exercises and practice tests.

For some learners, instruction is best delivered bilingually. For example, older learners qualifying for the 50/20 or 55/15 exemptions from taking a portion of the exam in English can take the history and government portion of the exam in their native language. Of course, such instruction can only be bilingual if all the students in a class speak the same native language. Even if older learners do not qualify for the 50/20 or 55/15 exemptions, they sometimes can learn the content faster in English if they first have the opportunity to learn it in their native language.

For learners who have limited educational backgrounds, “learning to learn” skills need to be included in the curriculum. These skills include strategies for organizing learning materials, such as keeping handouts in a binder and taking notes to study for a test. Students also need to learn how to make personal word lists of new words, how to do certain types of practice exercises, such as multiple choice or fill in the blank, and how to research information related to citizenship. Since all USCIS appointments are made online through InfoPass, learners need to learn how to navigate the Internet and use the USCIS website. Since there are many websites with citizenship curricula, learners also need to learn how to use the computer to access those exercises. In addition to the computer, language master machines, which are a type of magnetic card reader, and video are very useful tools for practicing language required on the citizenship exam.

In the ideal citizenship class, after whole class instruction with the teacher, students can break into groups to practice different tasks. Some students can practice history and government questions and answers with flash cards. Others may role play the USCIS interview and videotape themselves, while others may be reviewing key vocabulary on a section of the N-400, using a magnetic card reader, such as the language master machine.

Essential to any citizenship curriculum are assessment tools that measure mastery of the content and skills that are required for the exam. It is important, however, that assessment tools measure what is being assessed on the actual exam required at USCIS. If the learners must participate in an oral interview, then the curricula should include practice oral interviews. With a national citizenship plan in place and a national standardized test, curriculum and assessment materials could be developed that directly prepare students for the citizenship exam.

Ideally, there should be different testing options to demonstrate knowledge of U.S. history and civics. Students from countries with a strong oral tradition for learning typically have lower literacy skills. Similarly, students with educational backgrounds that rely more on reading and writing typically have a more difficult time with speaking. The Office of Citizenship should study different testing options in consultation with testing and language experts. A variety of assessment tools can then be created to support these options.

Effective citizenship curricula should also include a comprehensive teacher’s guide that instructs the teacher how to use the preparation materials to their fullest and use multiple resources to create an integrated citizenship course. Components of this guide may include the following:

- Syllabi (sequence of course topics) for short or long courses to accommodate learners who have citizenship exams within a few weeks or within a few months;
- A model lesson plan;
- Instructions for facilitating all the activities within the curricula, as in paired and small group activities, role plays, and cooperative learning exercises;
- Strategies for grouping students in a multilevel class;
- Strategies for using volunteers or aides in and outside of the classroom;
- Teaching tips for specific parts of the curriculum; and
- Answer keys.

The teacher’s manual should also provide the steps for techniques that help integrate English skill development with mastery of the competencies to pass the citizenship exam. For example, after learning about “how often” we elect the President of the United States, learners can practice other questions beginning with “how often” in paired activities, such as: “How often do you exercise?” “How often do you pay your rent?”

Following the implementation of a national, standardized curriculum, the Office of Citizenship should study the feasibility of allowing students to successfully complete a USCIS-certified course that includes competency requirements; thereby substituting the course for taking the traditional naturalization test. By substituting successful class completion, including competency requirements, Lawful Permanent Residents will be more motivated to learn more historical and U.S. value-based content.

The option of substituting the exam with a course was implemented by the former Immigration and Naturalization Service (INS) in 1991. INS contracted with six private testing services, which in turn subcontracted with various entities willing to provide classroom instruction and testing and issue course completion certificates. The initiative collapsed when testing fraud by one INS contractor and some of its subcontractors was uncovered by the media and investigated by congressional hearings and the Office of Inspector General.

Unfortunately, INS had not limited the types of organizations that could deliver instruction and testing services. An array of commercial for-profits were included, as well as well-established nonprofits that had a mission to serve immigrants. Nonprofits serving immigrants were not implicated in the scandal and the system would have worked if nonprofits had exclusively been awarded contracts. The initiative would have worked even better if INS had only permitted subcontracts with public adult

basic education schools, community colleges, and BIA-recognized nonprofits. Furthermore, INS did not have sufficient funds or staff to monitor contract compliance with its certified entities.

The collapse of the initiative damaged hundreds of credible institutions helping hundreds of thousands of Lawful Permanent Residents to become citizens. These institutions no longer had a desired service to provide, thereby stemming their access to immigrant communities and triggering the loss of much-needed revenue. At the same time, hundreds of thousands of future citizens who have limited English skills no longer had a means to learn U.S. history, government, and values comprehensively.

RECOMMENDATIONS:

- 1 Citizenship curricula should be developed based on varying levels of language proficiency, ranging from low beginner to high intermediate ESL, levels frequently found among students attending citizenship classes.
- 2 Following the development of a standardized naturalization test, the Office of Citizenship should partner with experienced citizenship educators to standardize the citizenship curricula.
- 3 ESL and citizenship experts should develop citizenship curricula, rising from a standardized national curricula, for different delivery modes, including individualized learning labs, distance education, and online learning.
- 4 Citizenship curricula developed for national use should be accompanied by a comprehensive teacher’s guide that provides sample exercises for all suggested learning activities.
- 5 Citizenship curricula should include the language functions used most in the course of a naturalization interview rather than focus exclusively on the content-based material of the history and civics test.
- 6 Citizenship curricula should include a pronunciation component to prepare students for the English oral demands of a USCIS naturalization interview. The curricula should also include listening to different accents and intonations that could possibly be used by USCIS examiners who are nonnative English speakers.
- 7 Citizenship curricula should include practice exercises on interpersonal skills and cultural behaviors deemed important for successful interviewing skills.
- 8 Citizenship curricula should include exercises focusing on the language functions required for the test at USCIS, including phrases like “Please repeat,” “Did you say,” and “I’m sorry, I didn’t understand you.”
- 9 Citizenship curricula should include strategies for remembering new vocabulary and using the words effectively when taking a test or undertaking an interview.

- 10 Citizenship curricula should be translated into non-English languages dominant among immigrant populations to support bilingual instruction that benefits learners qualifying for the 55/15 and 50/20 exemptions.
- 11 The Office of Citizenship should subcontract with language assessment specialists to develop assessment tools for teachers to measure core competencies required in the naturalization process.
- 12 The Office of Citizenship should produce citizenship and immigrant integration materials that are written at a low literacy level for immigrants with the greatest English language challenge. The Office of Citizenship should create parallel materials for people with a higher literacy level to match the English language ability of immigrants who have completed a secondary education or higher. This will ensure that federal immigrant integration materials match the cluster of immigrant language ability from very high to low in the United States.
- 13 The Office of Citizenship should establish, or promote through a grant, the creation of a national clearinghouse of citizenship and immigrant integration materials and resources. The materials need to be consistently updated and upgraded according to new realities. They should also be easily accessible and free of charge to organizations and individual users.
- 14 The Office of Citizenship should commission a study of alternative testing options that accommodate learners with different learning styles or backgrounds.
- 15 The Office of Citizenship should commission a study to investigate the feasibility of a federally controlled course completion requirement as a substitute for passing the USCIS history and civics content of the naturalization test to encourage immigrants with low literacy to apply for citizenship and acquire greater knowledge and experience not easily obtained otherwise.

Current Funding of Adult Basic Education/ESL Services

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Funding for General Adult ESL Services

Adult English as a second language (ESL) services in the United States are funded through a patchwork of federal, state, and local government agencies, and to a lesser extent by some nonprofit organizations and private entities. A major source of funding is the U.S. Department of Education, which provides approximately \$561 million annually through the Workforce Investment Act (WIA). This funding is authorized under the Adult Education and Family Literacy Act (AEFLA), and was enacted as Title II of the Workforce Investment Act (WIA) of 1998. The purpose of the program is to provide educational opportunities to adults 16 and older, not currently enrolled in school, who lack a high school diploma or the basic skills to function effectively in society or who are unable to speak, read, or write the English language.⁴⁶

WIA funding is distributed according to a formula to individual states, which competitively award grants to public agencies and private nonprofit entities such as community-based organizations (24 percent), community colleges (17 percent), and public school systems (54 percent). States retain 17.5 percent of the federal allocation for administrative expenses (5 percent) and program improvement activities (12.5 percent), such as professional development for instructors.⁴⁷

Nearly half of the participants in WIA-funded programs are immigrants who are studying English as a second language and basic literacy skills.⁴⁸ A separate portion of this federal funding (\$70 million) is earmarked for “English language/civics” services. Intended for adult immigrants, EL/civics programs provide English language and literacy instruction in combination with civics educa-

tion. However, the definition of “civics education” has been interpreted broadly in most states and the funding is often used for general ESL instruction, which may or may not include citizenship preparation. (EL/civics funding is currently approved on an annual basis. It has not been fully incorporated into the Workforce Investment Act appropriation.) WIA-funded programs serve over one million immigrant students. Half of these students are between the ages of 25 and 44, and an additional 20 percent are 45 years of age or older. Students in these programs are predominantly Hispanic (71 percent) or Asian (14 percent).

WIA providers offer instruction at a variety of different types of sites, including public schools, adult learning centers, faith-based facilities, community colleges, learners’ places of work, and libraries. Most of these programs offer classroom instruction, but one-to-one volunteer instruction and Internet-based distance learning options are also available in some states.

Sites at which WIA-Funded Providers Offered Basic Adult ESL Instruction (FY 2003)⁴⁹

Type of site	Percentage of providers offering some instruction at this type of site
Public school	57%
Adult learning center (single use facility)	46%
Community center (multiple use facility)	40%
Adult correctional facility	36%
Faith-based facility	29%
Learner’s place of work in space provided by employer	26%
Community college	25%
Library	24%
Learner’s home	13%

About 80 percent of the instructors in these programs are employed part-time. Many states require that instructors receive a minimum number of in-service training hours each year. Nearly 75 percent of programs reported in 2003 that their instructors participated in some kind of staff development activities.⁵⁰

WIA-funded programs spend approximately \$800 per student annually. Federal dollars make up about one-quarter of these funds, and the remainder comes from state and local sources. However, the share of funds provided by state and local sources varies widely across states. According to a 2006 CBS news report, for each of its residents with limited English proficiency, Michigan spends about \$190 on adult education, while Nevada spends less than \$5.⁵¹ In some states, federal funding varies from as

much as 75 percent to as little as 10 percent of the total spent per participant. States must match 25 percent of the federal contribution with state or local funds, but many states contribute considerably more. For example, Florida, Michigan, and California contribute about a 90 percent share of their WIA program budgets through state and local appropriations.

Most adult education programs have small budgets. Half of providers receive \$200,000 or less to support their adult education programs. About half (47 percent) of providers in FY 2003 reported that a majority of their funding was contributed by states, while 33 percent indicated that a majority of their funds came from federal sources. Another 5 percent reported that local government contributed a majority of their funds.

A small number of WIA-funded programs receive additional funding from nonpublic sources, such as donations from foundations, corporations, or the general public.

Nonpublic Funds Received by WIA-Funded Programs (FY 2003)

Source	Percentage of programs that received any funding from this source
Foundation grants	17%
Civic and individual donations	15%
Corporate giving	11%
Fees charged to participants	8%
Fees charged to employers for literacy programs	5%

However, most programs receive in-kind donations of goods and services. More than three-quarters of programs receive donations of classroom space, for example, and half have received donations of computer hardware.⁵²

Another source of federal funding for adult ESL services is the Pell grant program. This funding provides need-based grants to low-income students to attend classes at community colleges and accredited technical schools. Pell grants may be used to pay for ESL courses; however, students are generally required to show evidence of the equivalent of secondary education in terms of an “ability to benefit” requirement, so primarily immigrants who have prior formal education are able to take advantage of this funding. The average award is around \$2,400.⁵³

Other sources of federal funding are sometimes used to pay for adult ESL services. Funding, in these instances, is often limited to serving a particular subset of the population, such as parents with young children, migrant farm

workers, individuals with disabilities, welfare recipients, elderly refugees, or dislocated workers. In most cases, funding is not targeted for language instruction per se, but is available for a range of services, of which ESL is one eligible activity.⁵⁴

Demand for adult ESL services is increasingly outpacing available resources in many regions of the country. Many programs report waiting lists of six months to a year for a classroom slot,⁵⁵ and some states now estimate that they are able to serve less than half of the immigrants who are in need of services.⁵⁶ Some waiting lists are so long that potential students give up enrolling in classes.⁵⁷ Compounding the problem is the fact that in some less urban areas, ESL classes are simply not available.⁵⁸ Limited information about existing programs also appears to be keeping immigrants from accessing language classes.⁵⁹ The 1995 National Household Education Survey found that about one quarter of the limited English speakers surveyed were interested in taking an ESL class, but had not done so in the past 12 months. Nearly 60 percent of these respondents reported that this was because they did not know of any available classes.⁶⁰

Funding for Targeted Citizenship Preparation Services

Although about two-thirds of federally funded adult education programs offer general adult ESL services, only a subset of these offers any type of citizenship preparation component. There are a number of model citizenship preparation programs around the country that are innovative and offer a wide range of services. However, these programs serve only a fraction of the people in need of citizenship services. Since federal and state funding sources for adult education do not generally provide financial incentives for targeted citizenship education, programs are not encouraged to recruit students to form citizenship preparation classes. In many government-funded ESL programs, when a student identifies citizenship preparation as a learning goal, a volunteer placement or distance learning option is made available. This is a minimal approach to citizenship services which falls short of providing the program components and quality of instruction we recommend.

In some areas where immigrants do not have access to government-funded citizenship education services, a few community organizations and private businesses have stepped in to fill the gap. In various places, ethnic self-help groups (mutual assistance associations), churches, and volunteer and nonprofit community groups charge a tuition fee for citizenship classes, or do considerable fund-raising in order to make their services possible. In some instances, employers or unions use their operating budgets to support citizenship classes for workers. But, by and large, these

efforts are isolated from the larger network of government-funded adult education providers. They do not have access to staff and curriculum development resources, teacher certification or program accreditation standards, or any form of support or oversight from the adult education field. Because of this, and because of the funding restraints they operate under, there are substantial differences between programs, in terms of the quality of services offered.

Finally, it is worth noting that some citizenship study is self-funded. Many naturalization applicants purchase their own study materials or software, and prepare for the test without any government or privately funded services. These individuals are more likely to succeed if they already have a high degree of proficiency in oral and written English, and if they have friends or family members who can assist them in their efforts. No data are available on the prevalence or effectiveness of self-study efforts, but a national citizenship initiative should take this option into account and assist individuals who prefer to self-study by ensuring that low-cost, quality self-study materials are widely accessible to applicants and by ensuring that applicants are able to access information and referrals should they run into difficulties.

Clearly, in order for a national citizenship initiative to be effective, an expansion of funding, availability, and publicity of ESL services will be necessary, but this is not all that will be needed. Current education funders must not only direct that a reasonable portion of adult education dollars be allocated for citizenship education, they must make the attainment of citizenship a “primary outcome measure” in the National Reporting System (NRS), with an emphasis comparable to that now placed on learning gains and other outcome measures. Citizenship preparation is currently a “secondary outcome measure” that is not officially counted for federal NRS accountability reporting.

Adult education funding agencies must incorporate citizenship test preparation into their curriculum frameworks and provide technical assistance to expand the capacity of ESL instructors, counselors, and support service providers in this area. Additionally, they must promote collaboration among ESL providers and between these providers and legal service providers to ensure access to proper screening and application assistance for all students who wish to naturalize. Simply incorporating citizenship instruction (such as civics content and interview practice) into existing ESL classes is not a possibility, because only a subset of students attending any general ESL class is eligible to apply for citizenship. Adult education programs need to offer separate citizenship test preparation options in addition to, or as an alternative to, general ESL offerings and do strategic local outreach to ensure that immigrants are aware that targeted citizenship classes are available to

them. For this reason, it may be necessary to create new streams of funding tailored specifically to the purpose of promoting the attainment of citizenship.

One state initiative is already doing this and can serve as a model for a national citizenship implementation plan. The Illinois Department of Human Services has built an effective infrastructure for citizenship services along with a provider network that offers services to diverse immigrant communities in the state.⁶¹ In the first state-funded program of its kind, the Refugee and Immigrant Citizenship Initiative has, since 1995, funded ESL and citizenship preparation, as well as application services to more than 100,000 immigrants throughout Illinois.⁶² In order to encourage efficiency and promote quality, providers are encouraged to cooperate and share services, information, and advocacy. This has resulted in an efficient division of labor based on areas of expertise, a more comprehensive range of services, and an overall higher quality of services than would normally be available to immigrant students. Highlights of this initiative include a state-wide citizenship hotline and referral service, classroom instruction as well as home-based tutoring, support services (such as childcare and transportation), bilingual teachers, customized instruction for special populations (such as those with low literacy, the elderly, and deaf students), case management, outstanding advocacy efforts, and a highly effective system for technical assistance for instructors.⁶³

In providing additional streams of funding for coordinated citizenship services, policy makers need to consider the question of which types of service providers are best equipped to provide ESL/citizenship instruction. This question and other important citizenship funding matters should be incorporated into the independent, blue-ribbon National Commission on Adult Literacy established in October, 2006. While larger, more established providers of adult education services are generally most effective in providing language and literacy instruction, ethnic organizations are often highly effective at performing outreach and providing counseling to specific immigrant populations (particularly in their native languages). For this reason, collaborations between adult education providers and ethnic organizations should be strongly encouraged by funders and policymakers planning a citizenship education initiative.

Building Capacity

Capacity is not only the ability to offer instruction in citizenship preparation, but to do so at an acceptable standard of excellence. A good first step toward developing and strengthening capacity on a national level would be to establish ESL and citizenship program standards to evaluate and certify both existing and new programs. Some states have already developed adult ESL program standards to varying degrees, and the international ESL teachers' professional organization, TESOL, has also done so.⁶⁴ But

program standards designed specifically for providers of citizenship instruction have never been developed. A national citizenship initiative could build capacity by initiating the development of clear program and instructional standards for ESL and citizenship services, in areas such as:

- Program components, structure, and administration;
- Curriculum, instruction, and materials;
- Class size and instructional hours;
- Student intake, screening, and placement procedures;
- Teacher qualifications and employment conditions;
- Teacher and volunteer training and evaluation; and
- Cost (if any) to students.

Such standards could be used by programs to plan more effective services and by funding agencies in making allocation decisions.

In evaluating program effectiveness, funders should identify the number of students who attain citizenship as a key measure of success, but this should not be the only one. Funders must also ensure that there are incentives for providers to do adequate screening and follow-up of problem naturalization cases, make referrals to other providers when appropriate (such as for specialized literacy services or legal assistance), and provide counseling, information, and application support, as needed, to students who are able to prepare for citizenship through self-study materials.

Another important area in which a national initiative could significantly boost capacity is that of teacher and tutor training materials. By developing citizenship preparation training modules, the initiative could help teachers and volunteers master the information and skills they need to ensure their students' success. A training module could provide program administrators and other support staff with the information to design, maintain, and build upon effective service delivery models. These training modules should be available both as a distance learning option (through the Internet or through audiovisual media) and through in-person presentations. Provisions would need to be made to update these training modules periodically as naturalization regulations, procedures, and testing requirements change.

In order to provide effective services, providers need clear channels of communication with USCIS field offices. Currently very few programs have an effective means for locating accurate and timely information, for example, on application and testing procedures, or for following up on problem cases. This can lead to dissemination of incomplete or misleading information by program staff in spite of

their best intentions. USCIS could boost capacity by establishing a mechanism for responding to requests for information from adult education providers. As part of this effort, it should also provide information on instructional, teacher/tutor training, and funding resources to adult education providers, and provide referrals for students to citizenship preparation services in their area.

A final issue of concern involves two related areas of need: increasing availability and access to citizenship preparation programs and increasing coordination of immigrant-related services in local geographical areas. In many local areas, existing instructional programs complain that they do not have enough students at one time interested in citizenship preparation courses to form a complete class, so they limit their offerings to tutoring or no services at all. However, if there were a way to pool the resources in a local geographical area, it is much more likely that citizenship preparation classes could be formed and that they could be at a high level of educational excellence.

One possible solution to this dilemma is to form citizenship coordinating councils around the country. The purpose of these councils would be to coordinate services within a geographical area and to identify areas of weakness and strength in service provision to immigrants. It is not possible to suggest one solution that will fit everywhere, since strengths and weaknesses in service provision vary greatly. For this reason, a customized local approach to service coordination is recommended. Funding for a network coordinator may be necessary in some geographical areas; the benefit of a paid staff person in this role is that this person can both spearhead the coordination efforts and work toward raising funds to address specific local needs. These councils should be tasked with: studying the specific needs and strengths of local programs, identifying and working to eliminate gaps in services, increasing capacity, and avoiding duplication of efforts within a given community.

RECOMMENDATIONS:

- 1 Current funding streams for adult ESL services should be expanded in terms of numbers served and incorporate the attainment of citizenship as one of the primary objectives of instruction.
- 2 The U.S. Department of Education should clarify the instructional objectives of its EL/civics program and ensure that citizenship preparation is a primary activity, available to immigrant students in every state.
- 3 Current funding policies should reward states and programs for student progress in citizenship preparation as a primary outcome measure in the National Reporting System.
- 4 Federal funders of adult education and ESL services should require programs to incorporate naturalization

information into curriculum for students (particularly new arrivals) to ensure that eligible immigrants understand the citizenship process and can begin, even at the early stages of resettlement, to consider and plan for eventual naturalization.

- 5 New funding streams, specifically aimed at citizenship instruction, should be created.
- 6 Funders should consider positive outcomes in a broad sense when designing accountability measures for programs. In addition to rewarding classroom services that lead to successful naturalization applications, funders should also ensure that there are incentives for providers to do adequate screening and follow-up of problem naturalization cases, make referrals to other providers when appropriate (such as for specialized literacy services or legal assistance), and provide counseling, information, and application support, as needed, to students who are able to prepare for citizenship through self-study materials.
- 7 Funders and policymakers should, in consultation with experienced citizenship educators, establish reasonable program and instructional standards for citizenship providers in terms of: class size, teacher qualifications and pay, general curriculum components, application support services, and maximum costs (if any) to students.
- 8 Funding should be provided to create teacher and tutor training materials, which would be available on the Internet, preferably at no cost to service providers.
- 9 The Office of Citizenship should target a portion of citizenship funding for establishment of local citizenship coordinating councils that draw together immigration advocates and providers of citizenship services to ensure the broadest possible range of services (in terms service locations, scheduling options, support services, and customized services for special populations) and foster collective outreach, referral, advocacy, fund-raising, and technical assistance efforts.
- 10 The Office of Citizenship should create mechanisms for responding to inquiries and disseminating information (such as changes in application and testing procedures, instructional resources, and funding opportunities) to citizenship providers in an effective and timely manner.
- 11 Collaborative service delivery efforts between adult education providers and ethnic self-help organizations should be strongly encouraged by funders and policymakers planning a citizenship education initiative, since both types of organizations have particular strengths to contribute.

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CHARACTERISTICS OF A SUCCESSFUL LOCAL CITIZENSHIP PROGRAM

The centerpiece of a national citizenship initiative will be community-based, charitable, legal immigration service programs. This chapter recommends the key characteristics of such programs, both for program directors and staff delivering comprehensive citizenship services and for funders evaluating the professionalism and capacity of such programs.

Each characteristic is discussed briefly, followed by descriptive details that can be used as benchmarks for achieving the objective. While all programs must fit local realities, these recommendations should be achievable in every community. For more information on legal immigration service program models, please read *Immigration Management: Building Blocks for a Successful Program*, produced by the Catholic Legal Immigration Network, Inc. (CLINIC), Lutheran Immigration and Refugee Services, and Immigration and Refugee Services of America. Readers with interest in this chapter should consider attending CLINIC Immigration Program Management Training. A training schedule may be viewed at www.cliniclegal.org/training.

Well-Trained Legal Staff

The success of a community service model turns on the expertise and dedication of staff. Legal training is essential but can often be overlooked because of time demands and budget constraints. Staff training opportunities set a standard for professional development and serve as a reward for staff who are often overworked and underpaid. The lack of proper training can result in the U.S. Citizenship and Immigration Services (USCIS) denying an application, an immigrant being placed in removal proceedings, or a malpractice suit against legal staff and their employer. A positive outcome of well-trained staff is a high rate of naturalization approvals and a zero rate of improper filings, which will garner increased client satisfaction and community trust in the naturalization process. Another benefit is improved staff retention.

BENCHMARKS:

- 1 Training time is documented in an employee's work plan and schedule. Staff supervision and yearly evaluation verifies completed training and satisfaction. New employees are assigned experienced mentors and a mentorship plan is implemented and fulfilled.
- 2 The parent agency budgets sufficient funds for all staff to attend yearly trainings on topics relevant to their caseloads. Staff attend local and national trainings by organizations that provide ongoing technical assistance. Local USCIS staff are invited to train community-based organizations on immigration and naturalization law and benefit application processing procedures. In-house, ongoing training, led by a supervising attorney, is preferred, supplemented by occasional external training.
- 3 Peer review of case files is conducted prior to filing applications to ensure quality, particularly for new staff. Peer review is also a form of staff training.
- 4 The parent nonprofit agency simultaneously seeks Board of Immigration Appeals (BIA) agency recognition status and accreditation status for its nonattorney staff.

Partnerships with Community Organizations

One organization can seldom deliver comprehensive citizenship services. Most often, organizations need the resources of other organizations, gained through formal and informal partnerships and volunteer services.

Ideally, a comprehensive citizenship program at the local level is horizontally and vertically integrated with other organizations. Partnerships among organizations with shared or complimentary missions provide expanded services, more training opportunities, and strong advocacy efforts. At the local level, relationships with other community-based service providers enable widespread and

targeted outreach, seamless referrals and expanded services, and the elimination of unnecessary duplication of services. Local agencies also join networks with national support organizations to receive training, technical support, news updates, advocacy support, conference opportunities, and funding.

BENCHMARKS:

- 1** Citizenship programs are active members of national, state, and local coalitions that engage in advocacy and support the provision of naturalization services and other immigration benefits.
- 2** Citizenship programs in formal collaboration share funding opportunities and unite diverse but complimentary expertise, particularly legal immigration services and English as a second language (ESL) instruction.
- 3** An essential purpose of partnerships is to expand a program's service capacity, such as the ability to train staff and volunteers. Partnerships to access legal services ensure that only attorneys or BIA-accredited staff practice law.
- 4** Partnering organizations develop outreach materials in all targeted languages and standardize their appearance and text to ensure quality and clarity of citizenship messages.
- 5** Outreach across the target area is strategically developed among organizations, using current demographic data from the U.S. Census's Community Population Survey and other reliable data sets.
- 6** Community-wide events such as naturalization group application workshops and naturalization oath ceremonies are planned and coordinated with every partnering organization. They, in turn, use their list of friends and media contacts to invite community groups to attend.
- 7** Community-based coalitions regularly communicate with USCIS staff, particularly the community liaison officer, and the Office of Citizenship in the Department of Homeland Security (DHS) to maintain open dialogue about case status updates, advocacy concerns, and programmatic needs.

Inclusion of Naturalized Immigrants as Partners

Naturalized immigrants are possibly the best promoters of U.S. citizenship and exemplify what is good about the nation's immigrant heritage and policies. Their stories and successes are what commit community-based organizations to provide citizenship programs. Yet immigrants who are former clients or local residents not connected to service organizations are an easily overlooked resource. Partnerships with immigrants, especially naturalized citizens, can strengthen a program through their expanded community contacts, technical and experiential knowledge, and donations of time and money.

BENCHMARKS:

- 1** Naturalized immigrants are trained and supported to conduct outreach and eligibility prescreening.
- 2** Naturalized immigrants are featured in multimedia messages and broad outreach campaigns. They promote fair immigration laws in local newspapers, editorials, and letter-writing campaigns to elected officials.
- 3** English and naturalization classes are expanded to include immigrant teachers trained in adult education, English instruction, and naturalization.
- 4** Volunteer English tutors include naturalized immigrants who lack teaching experience or training but possess well-developed English-language skills.
- 5** Naturalized immigrants trained in naturalization law and procedures, including so-called "red flag" issues of concern, conduct mock naturalization interviews in their homes, neighborhoods, or community centers for applicants scheduled for their first interviews.
- 6** Naturalized immigrants speak at naturalization oath ceremonies about the benefits and responsibilities of U.S. citizenship and how these apply to their personal lives.
- 7** Naturalized immigrants join other volunteers to provide post-oath ceremony services, including voter registration, passport application assistance, and information to new citizen parents about their children's citizenship.
- 8** Naturalized immigrants are board members, advisory group members, and donors to local and national charitable organizations.

Ample and Sustainable Funding

Preparing immigrants, particularly the most vulnerable, for naturalization can be a lengthy process. Therefore, a comprehensive naturalization program requires ample and sustainable funding.

Funders should acknowledge that naturalization services leading to U.S. citizenship result in numerous benefits for foreign and native-born communities in an era of historically high immigration. A short list of benefits include: 1) a life-changing, enduring improvement for millions of immigrants, 2) elevated community engagement and good will toward immigrants, 3) a reduced gap between enfranchised and disenfranchised residents, and 4) integration of foreign-born and native-born populations.

A lack of funding for legal service agencies often means that citizenship programs are neglected. The path to citizenship is a daunting, lengthy process, and, when funding is limited, naturalization services and outreach may be neglected in the face of immigrants' immediate need for status and documentation. As a result, fewer foreign-born residents than are optimal know English, U.S. history, and civics. Because of limited funding for outreach and education about the process, even would-be citizens who do not need assistance are slower in making citizenship applications. All this results in an ever-increasing gap between naturalized and nonnaturalized immigrants along racial, ethnic, and socioeconomic class divides. Furthermore, if funding is ample in one state, but not another, the result is a gross imbalance that has national implications.

The failure of government, philanthropic, and corporate sources to adequately fund services allows the nation to benefit from the economic and cultural contributions of noncitizens, while ignoring or impeding their full inclusion as equals under the law.

BENCHMARKS:

- 1 Community service agencies have pie charts breaking down sources of funding by categories to determine if the funding mix reflects an appropriate balance.
- 2 Board members assist in cultivating foundations and individual donors.
- 3 Proposals for funding reflect a comprehensive approach to citizenship services, including demographic and statistical need, well-defined benefits and responsibilities of citizenship, legal and language support services, enduring partnerships, and the macro impact of expanded naturalization rates on the community, state, and country.
- 4 Proposals reflect a collaborative fundraising approach among organizations in support of the citizenship project.

- 5 Funders, government, foundations, and private businesses are well informed and conversant on the need for naturalization services, their benefits to immigrants, and long-lasting, positive consequences for local communities and the nation as a whole.
- 6 By invitation, funders visit agency sites where direct services are delivered. They also attend public events such as naturalization workshops, naturalization oath ceremonies, polling stations in immigrant communities, and immigrant-led advocacy events where voter representation is consequential.
- 7 Service providers demonstrate the characteristics of a comprehensive citizenship program that appeal to funders, particularly community partnerships, multiple funding sources, and diverse client populations, as well as documentation and evaluation of outcomes.
- 8 Immigrant-focused and immigrant-led community organizers for social change report to funders on the successes of naturalized immigrants who vote and participate in advocacy campaigns.

Effective Use of Statistical and Client Databases

Using database technology can facilitate decision-making and document outcomes. Demographic data sets of the foreign-born population by characteristics and locale can be very useful in determining service agency office locations, staffing and language needs, outreach strategy, and placement of neighborhood citizenship services and events. Client databases can be organized for simple queries according to nationality, gender, age, zip code, and citizenship eligibility dates for parents and children. Client and demographic databases can be used together to track naturalization applications and approval rates against noncitizen numbers in metropolitan statistical areas. Comparing rising naturalization rates over time against U.S. Census Bureau and USCIS immigration data can mark citizenship program successes.

BENCHMARKS:

- 1 Staff access and read demographic data from the U.S. Census Bureau and DHS's Office of Immigration Statistics.
- 2 Client databases are complete and current with categories for queries and capable of producing mailing labels for client communications.
- 3 Directors use data technology and results to make program decisions.

- 4 Client databases are designed with tickler systems so that when individuals obtain Lawful Permanent Resident status they are sent information on naturalization benefits, requirements, and resources. A similar tickler system is used when individuals are approaching an eligibility date for naturalization: They receive mail and phone calls referring them to language and citizenship classes and setting an appointment to complete a naturalization application.
- 5 Databases are set up with tickler systems to inform parents when children at 18 or older are eligible to naturalize on their own or when minor children are citizens through derivation and need documentation to verify their citizenship status.
- 6 USCIS oath ceremony notifications or responses from calls to clients determine when clients have obtained citizenship in order to provide post-citizenship services.
- 7 Noncitizen data sets are compared to naturalization applications and approvals to determine program outcomes and guide evaluation.

Productive Relations with the Department of Homeland Security

The U. S. Immigration and Citizenship Services (USCIS) is a division of the Department of Homeland Security (DHS) and the successor to the Immigration and Naturalization Service (INS). It is responsible for administering immigration and naturalization adjudication functions and establishing immigration services, policies, and priorities. Its duties include receiving and adjudicating naturalization applications and, in some districts, giving the oath of allegiance and certificate of citizenship. The responsibility of the Office of Citizenship (OoC), also in DHS, 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.” USCIS and OoC are separate but work in partnership under the supervision of the USCIS director.

The Application for Naturalization (N-400) and other naturalization-supporting documents are sent to one of four USCIS Service Centers based on the applicant’s residence. The Service Center cashes the application fees and reviews the documentation for prima facie eligibility. Then, the documents are sent to one of USCIS’s District Offices with jurisdiction over the naturalization applicant’s interview, eligibility outcome, and oath ceremony.

Given the authority of DHS over the receipt, processing, and outcome of all immigration benefits, it is imperative that immigrant service organizations have a cooperative and productive relationship with DHS offices. They should be aware of their respective activities, create a feedback loop for questions, answers, clarifications, and

corrections, improve efficiency for immigrant applicants, and generate goodwill despite any past disappointments. Open communication is key. The responsibility should be mutual and evenly shared; if it is not, both government and private services are less effective, more costly, and discouraging to the immigrant community than they otherwise would have been.

BENCHMARKS:

- 1 Regularly scheduled meetings are held between DHS representatives with decision-making authority and immigrant-focused coalitions that deliver immigration services and promote fair immigration policies. Meeting agendas are set in advance, mutually developed, and reflect the needs of both sides. DHS provides community groups with accurate statistics on applications filed and processing dates. An agreement should be reached as to whether policy discussions and case inquiries will be on the same or separate meeting agendas.
- 2 Community-based organizations document the needs of immigrant customers and legal service providers in letters to the appropriate DHS staff in authority. Letters specifically state what action is needed to produce the desired outcome.
- 3 DHS staff make their phone and fax numbers and email addresses available to legal representatives with confidence that this contact information will not be shared freely or abused.
- 4 By invitation, DHS staff attend public information meetings and naturalization workshops for question-and-answer sessions with immigrant communities.
- 5 By invitation, DHS staff provide immigration and naturalization law training to charitable legal and social-service staff, including English and naturalization teachers.
- 6 DHS maintains and updates a list of BIA-recognized agencies providing charitable legal immigration services and community-based English-language classes. Community-based organizations delivering these services facilitate DHS’s maintenance and updates of these lists.
- 7 By invitation, DHS conducts offsite “circuit-ride” adjudication appointments and oath ceremonies at community organization sites for the ease of immigrant clients, especially the elderly, the disabled, and those living in cities far from USCIS District Offices.
- 8 DHS welcomes the participation of community groups in oath ceremonies and their provision of post-citizenship services.

Integrated Legal and Language Services

Although legal immigration staff and English-language teachers use different skills and deliver different services, their identities are inextricably linked in the minds of their foreign-born clients. Almost all immigrants have contact with both professions over the course of their lives in the United States. Yet these professionals know little about one another, and institutional and programmatic ties have not been fully developed. This lack of integration is particularly detrimental when delivering comprehensive citizenship services.

Typically, these professionals see foreign-born clients with similar characteristics and needs. Their clients tend to be recent arrivals who are semiskilled, work multiple jobs, and earn low income. They have few years of formal education and have low literacy rates in their native language. They often are juggling childcare responsibilities at home. Many are from such vulnerable populations as refugees, the elderly, or the disabled.

These immigrants contribute their labor and culture but are often so overworked they have no time to pursue their own immigration and English-language needs. Delivering legal and language services to them requires a shared mission, an increased number of combined resources, cross-trained staff, and time to redesign fragmented programs. The desired outcome is to ensure that our nation's most vulnerable newcomers are not alienated and made more vulnerable in their adopted country, but receive all the opportunities the United States has to offer to them and their children. Promoting and delivering citizenship services is one of the best ways to achieve this goal.

BENCHMARKS:

- 1 Legal immigration programs or parent organizations include in-house literacy and English-language programs for the foreign born. Institutional spaces are shared, and both legal and language services offer expanded hours, transportation, and childcare.
- 2 Together, both professions call on employers to provide worksite English and naturalization classes for their employees.
- 3 Legal immigration programs, charitable organizations, and language programs forge programmatic ties that provide seamless services. Joint funding proposals that recognize the imperative of blending these services are submitted to lead funders.

- 4 Legal immigration staff and their parent organizations join language instructors in educating funders about the severe lack of affordable and accessible English-language classes. Both professions can garner increased federal, state, county, philanthropic, and corporate funding for English-language services by working together.
- 5 Legal immigration programs train language teachers about basic naturalization law but provide legal service support to avoid pressuring them to act as paralegals for their immigrant students. Legal staff visit language classes to conduct immigration question-and-answer sessions.
- 6 English teachers offer legal immigration staff language instruction for cross-training purposes to certify them to teach English and citizenship classes.
- 7 English and naturalization teachers are recruited and trained to participate in naturalization group processing workshops.
- 8 Professionals from both occupations unite in designing native-language outreach for English classes and naturalization instruction materials.
- 9 Teachers of immigrant student populations are recruited as members of immigration coalitions to improve the flow of information between USCIS, English teachers, and the immigrant community.

A Full Range of Naturalization Classes and Services

Just as linking legal and English-language professionals is important to delivering efficient services, forging a comprehensive, community-wide citizenship program is critical. Whether in the name of one organization or as part of consortia of agencies, a comprehensive approach provides seamless services. Such a program supports all the special needs of naturalization applicants and assists them from start to finish—from education about eligibility, rights, and responsibilities to post-oath ceremony integration and empowerment activities.

Naturalization classes are where the most time and effort is spent to make citizenship possible for the greatest number of people. Classes for literacy in native and English languages, vocational English, General Education Degree (GED) classes, and civics instruction can foster the desire and build the skills for citizenship. All foreign-born residents of the United States, despite varying degrees of English-language ability and length of lawful permanent residency, should be viewed as potential citizens. A short-term view of an immigrant's future in the United States, coupled with a fragmented or limited roster of legal and language citizenship services, will exclude vulnerable populations from a national citizenship implementation plan.

BENCHMARKS:

- 1 Literacy, language, and citizenship classes are sufficient in number, conveniently located, and offered at times that meet the needs of immigrants, based on registration numbers, drop-out rates, and pre-registration rates.
- 2 Enrollment is open, offering flexibility to immigrant learners with demanding schedules.
- 3 Curricula for all English class levels seamlessly incorporate components of naturalization content to maintain students' interest and to encourage Lawful Permanent Residents (LPRs) to see citizenship as a long-term goal.
- 4 Naturalization content emphasizes adult learning strategies and innovative techniques, including comparisons between the native country and the United States, debates on historical and contemporary politics, role play, student presentations, field trips, guest speakers, multimedia tools, and computer-based learning.
- 5 English classes that teach civics are not substituted for citizenship classes for applicants in the naturalization process who need specific training to pass the naturalization test.
- 6 Mock naturalization interviews are flexibly scheduled and available each week for LPRs who have an upcoming USCIS interview or test appointment.

Program Links with National Support Organizations

A national citizenship implementation plan greatly depends on integrated partnerships at national, state, and municipal levels among charitable organizations that have a mutual goal to promote citizenship and deliver naturalization services. Although considerable activity takes place at the local community level, there is an obvious need for national organization, leadership, funding, technical support, evaluation, and promotion.

Many charitable legal immigration services and language support programs are members of local, state, or national coalitions. However, as the immigrant community grows, charitable immigrant-focused and English-language support programs change and expand. It cannot be assumed that the current infrastructure of local and national membership agencies and coalitions can adequately respond to a national movement that encourages citizenship. Therefore, a national citizenship implementation plan should promote vertical and horizontal linkages that encourage replication of best models, ensure quality services, and avoid placing immigrants in situations harmful to their status and family unity.

BENCHMARKS:

- 1 Each local service provider is a formal, active member of a community coalition that has a leadership structure and defined roles.
- 2 Each local service provider, on its own or through a coalition, is a member of a national support organization that provides leadership, policy information, management guidance, advocacy assistance, funding, training, technical support, evaluation, and guidance for sustainability.
- 3 Local and national coalitions frequently meet or participate in conference calls to continually assess the viability and challenges of a national citizenship plan.
- 4 Formal communication structures and reporting methods identify areas of the country where services are best delivered in number and quality and where they are poorly provided.

Solid Program Evaluations and Reassessment

Charitable program staff have little time or capacity to fully engage in program evaluation and assess the value and impact of services. Too often, qualitative and quantitative reports to a parent organization or funder are prepared at deadline, not systematically peer reviewed after submission, and not designed to be cumulative and follow trends and track unmet needs. A national citizenship plan requires well-defined goals and objectives, proven interventions, shared data collection that is methodologically sound, and data review with wide dissemination of results. Failure to take these steps will result in the lack of documentation of the plan's impact, wasting considerable funding and human services. Replication and sustainability of a national plan is highly unlikely without cooperative support for program monitoring and evaluation.

BENCHMARKS:

- 1 Naturalization applicants are identified at intake or when they obtain language or naturalization certificates.
- 2 Service delivery agencies collect data that can be easily compared with city, state, and national statistics to evaluate integration goals.
- 3 Data is tracked by nationality, native language, gender, age, income level, special needs, and outcomes. Local data is compared to current municipal and national data sets.
- 4 Trends reveal over- and under-representation of applicants by demographic characteristics. Possible causes are identified, and alternative approaches are pursued and constantly reevaluated.

- 5 USCIS statistics of applicant approval and denial rates are compared with client sources to identify disparities or undesirable trends in specific populations who fail first and second naturalization interviews or tests.
- 6 English-language and literacy programs conduct pre- and post-course tests on language, literacy, and naturalization content knowledge. At each stage, individual results are provided to students for self-assessment and encouragement. Program staff evaluate cumulative test results to gauge intervention effectiveness and to show funders the success of intervention.
- 7 Service delivery agencies provide clients with customer satisfaction surveys to identify strengths and weaknesses of the program and to collect ideas for improvements.
- 8 Focus groups of recently naturalized citizens are held to gather input on how the community and target populations evaluate the naturalization process and the citizenship services delivered by charitable organizations, volunteers, and government agencies.

Multiple Links within the Community

A national citizenship implementation plan will successfully recruit and retain support from as many sectors of society as possible in every community. Assisting naturalization applicants to become U.S. citizens can inspire people of diverse backgrounds and perspectives, not just the foreign-born, but the native-born population as well. Out of this common labor of love, local charitable programs can gain significant community support and resources. Widespread local backing and community involvement help ensure sustained interest and engagement at the national level. If communities nationwide embrace a national citizenship program, it will be possible for everyone to feel as though they have a vested interest in the process and a valued role in helping community members become citizens.

BENCHMARKS:

- 1 Charitable legal service programs continually recruit, train, and retain pro bono attorneys to assist at group naturalization workshops and help individual clients needing extensive legal services.
- 2 Individuals representing diverse sectors of society dedicated to immigrant integration regularly attend training in naturalization law and naturalization test tutoring.
- 3 Elected municipal officials, community leaders, and civic associations make recruitment of volunteers to aid in naturalization a high priority.
- 4 A Community Citizenship Volunteer Corps is formally or informally established to train and engage private citizens and staff from various organizations to join in

outreach, teaching, tutoring, and naturalization group processing workshops. Volunteers help organize special events on Independence Day and Citizenship Day (September 17) and at oath ceremonies. They participate in post-naturalization assistance activities and pro-immigrant organizing and advocacy events.

- 5 A Community Citizenship Volunteer Corps listserve is available for maximum communication on upcoming events and the need for volunteers.

Positive Media Coverage

The media, including broadcast celebrities, have considerable influence in defining an issue and shaping perceptions. Regrettably, the trend toward sensationalist news reporting has meant that stories emphasize the so-called negative aspects of immigration rather than the positive contributions immigrants make and the challenges they face. Although we are a nation of immigrants and benefit largely from immigrant labor and cultural traditions, few can recite basic facts about immigration numbers or differentiate between myth and fact.

The quest of immigrants to obtain U.S. citizenship is a story that remains inspiring because each person's history and struggle to obtain their "American dream" is different. Migrants' stories are also uniquely informative about global conditions and local realities.

It is the responsibility of immigrant-supporting groups to make these stories known. Positive media coverage can translate into a welcoming citizenry that is informed about immigration and inspired to participate in a national citizenship effort.

BENCHMARKS:

- 1 Local media are routinely invited to cover USCIS oath ceremonies and given access to one or more immigrants who are willing to tell their stories.
- 2 Organizations involved with promoting citizenship continuously target the national media with stories highlighting the desire of most immigrants to obtain U.S. citizenship and their struggles to become U.S. citizens. They release compelling data and reports that illustrate the lack of a national immigrant policy that supports integration and citizenship and the benefits of greater U.S. citizenship rates for immigrant and native-born communities.
- 3 Local, non-English outlets provide frequent updates by immigration on important changes in immigration laws and offer public service announcements on naturalization eligibility requirements and the rights and responsibilities of U.S. citizenship.

NATURALIZATION GROUP APPLICATION WORKSHOPS

A naturalization group application workshop is a one-day community event that brings professionals and trained volunteers together to assist Lawful Permanent Residents in completing the Application for Naturalization (N-400). The workshop is an essential tool in a national citizenship program for efficiently and effectively providing naturalization assistance to large numbers of people.

Workshop Models

There are two common but distinct naturalization group application workshop models. The legal model views immigrants first and foremost as applicants eligible for a federal immigration status based on immigration law and regulations. Eligibility is determined through a prescreening or intake process before beginning the application and is verified through a quality-control procedure after the application is completed. These steps help ensure that applicants avoid any negative consequences from submitting an application in error, such as denial or deportation. A legal model considers a workshop successful when all eligible applicants are assisted to file complete and accurate applications and all ineligible applicants are identified and screened out.

The community organizing model views immigrants primarily as a disenfranchised population needing to become voters to overcome their marginalized status. This model tends to emphasize the importance of filing a high number of applications so that immigrants can be linked to organizers for future voter registration and participation at the polls. While the community organizing model may provide all the necessary pre-screening and quality control steps to protect immigrants from harm, this model is frequently driven by numbers.

It is important to note that the two models are not irreconcilable. The goals of both can be blended. Workshops can assist large numbers of people and ensure efficiency and quality of service if the sponsor of the event takes necessary precautions. However, the authors of this report strongly recommend that the legal model prevail in defining workshop operations and that it be the basis for decisions that are made in the applicants' best interests.

Elected officials, typically congressional representatives, occasionally sponsor workshops as a constituency service. They view immigrants as a unique constituency that needs special assistance to navigate the naturalization application process. The congressional representative's workshop may also serve as a soft-sell campaign device to garner support from future immigrant voters in an upcoming

election. Whatever the primary motivation, elected officials are encouraged under a national citizenship program to sponsor workshops and partner with qualified legal organizations that have experienced staff who serve as the chief decision makers for each applicant.

Rationale for Choosing the Legal Model

The legal model is based on the fact that naturalization is a legal process guided by federal law and regulations. The application is signed under penalty of law. In addition, increasing numbers of states are enacting statutes that prohibit the unauthorized practice of law, including legal immigration assistance. It is advisable for workshop sponsors to know their state law in this regard. As a legal process, naturalization can result in extremely positive or negative outcomes. The positive outcome is for immigrants to obtain U.S. citizenship with all its rights, benefits, and responsibilities. A negative result is for the applicant to be denied citizenship because of a correctable ineligibility, or, worse, detained, separated from family members, and removed from the United States.

A Workshop by a Different Name

The workshop model goes by various names in different communities—naturalization workshop, naturalization group processing, naturalization clinic, citizenship workshop, citizenship group processing workshop, or citizenship clinic. Further, there are differences between “workshops” and “clinics.” A workshop is a periodically scheduled event typically held away from the sponsoring organization's office at a location that can accommodate large numbers of people seeking to complete an immigration application. A clinic is held at a regularly scheduled time, often a weekday evening or Saturday morning, when a limited number of persons without appointments can meet a legal immigration counselor in the sponsoring organization's office for consultation or application assistance.

Workshop Benefits

The workshop model can result in many positive outcomes for both immigrant communities and immigrant-service organizations. Outreach that draws immigrants to a workshop increases knowledge of the naturalization process and appreciation for citizenship rights and responsibilities:

- Through targeted and ongoing outreach, the immigrant community learns the benefits of citizenship and how to prepare for the eligibility requirements.
- Through mass communication messages and individual contacts from influential community members, immigrants are motivated to attain citizenship.
- Through friendly, professional consultation, immigrants who fear immigration officials or the naturalization process have myths dispelled and concerns allayed.

At workshops, immigrants who have minimal confidence in their English language ability can be conveniently assessed by naturalization experts and learn if their proficiency is sufficient to succeed with or without English and naturalization classes. They also receive instructional aid and referrals:

- Applicants are given access to English- and native-language study materials.
- They are referred to citizenship classes that provide instruction on English, U.S. history, and civics. Such classes increase an applicant's chance to pass the naturalization test and provide a forum to learn, discuss, and participate in the "American experience."
- Immigrants collect useful information on vocational training, English classes, community safety, health, and the electoral process in addition to "know-your-rights" materials related to employment, housing, civil rights, and immigration law.

Workshops offer immigrants the opportunity to ask general questions or discuss specific problems with their pending application:

- Immigrants applying for naturalization can learn how their minor, dependent children will become citizens through derivation and how to document their status.
- Immigrants who are already citizens through derivation can verify their existing citizenship status.
- Since the U.S. Citizenship and Immigration Services (USCIS) severely limits walk-in appointments and requires an InfoPass to see an officer, immigrants can meet informally with a USCIS public information or adjudication officer.

- Immigrants with special needs, such as the elderly, disabled, and low-income, as well as those who speak limited English or have complex immigration and legal histories, can ask experts questions and learn how to overcome these barriers.
- Immigrants requiring additional services can receive referrals, including to services unrelated to naturalization.

With the workshop model, community resources are efficiently used through professional and volunteer support when time, money, and talent can be in short supply. At the same time, applicants receive high-quality legal immigration services at a low cost compared to private attorney fees, particularly saving money for multiple family members wishing to become citizens together.

In turn, workshop-sponsoring agencies can achieve increased community visibility and garner positive, hard-to-come-by media attention. They may also receive more in-cash and in-kind community support.

Community members—native and foreign-born, of all races, nationalities, ethnicities, religions, and socioeconomic levels—work together for one common purpose, resulting in increased familiarity, understanding, and empathy. Integration services and community organizing efforts expose immigrants to U.S. ideals and traditions that continue to define our country.

Workshop Formats

Immigrants apply for citizenship sooner and in higher numbers through a convenient, "one-stop" format. Below is an extensive description of a "one-stop" or "same-day" workshop. An alternate format is completed in two stops or two days. Simply described, this second model asks intending applicants to: preregister, pay a workshop fee, attend an information meeting about eligibility and documentation requirements, and take an Application for Naturalization (N-400) home to complete as well as possible. On the following day, or a day soon thereafter, the applicant attends a workshop where the application is completed and packaged for mailing. This model saves time on the day of the workshop but has a lower completion rate than the one-stop model because it requires applicants to appear twice.

Preparation for a Workshop

The decision to conduct a naturalization workshop cannot be taken lightly. Performed badly, it can result in weakened community relations, poor reputation with clients, and, worst of all, an immigrant placed in removal proceedings. Performed successfully, it can become an institutionalized event that transforms an immigrant community into one with members enjoying the full benefits of citizenship.

Good preparation and attention to detail before a workshop will give sponsors a feeling of confidence and give applicants evidence of professionalism and community collaboration.

Needs assessment and planning:

First, a team of legal immigration and community organizing professionals assesses the need for implementing the workshop model using demographic data on noncitizens and interviews with stakeholders, particularly noncitizen Lawful Permanent Residents and potential volunteers. Second, sponsoring and cosponsoring organizations must identify the level of staff time and financial resources required and available for each workshop. Third, the capacity of local service organizations to provide increased follow-up services needs to be assessed. Lastly, the sponsors choose mutually acceptable goals, objectives, and implementation strategies.

After choosing a model and format, the following policies can be determined: 1) the feasible number of workshops to be sponsored in a year, taking care to avoid federal, religious, and ethnic holidays, 2) a cap to the number of applicants to be served at each workshop, 3) “custody” of the reported number of people served, 4) services that will and will not be provided at the workshop, 5) pre-registration requirements and policies toward walk-ins, 6) fee levels for each discrete service, as well as for packaged services, 7) desirable locations, 8) volunteer recruitment ideas, and 9) responsibilities for outreach, training, on-site management, quality control, and project evaluation. These policy decisions cannot be competently made ad hoc on the day of the event when questions and challenges arise.

Site location:

The success of any community event greatly depends on the appropriateness of its location. If a sponsor organization’s office is not adequate, it is preferred that an alternative site be made available at no cost or for an affordable rental fee. The location should have ample parking and be accessible to public transportation and the disabled. A large waiting area is needed for registered people and walk-ins and a common area for workstations, including registration, intake, USCIS staff, study materials, and photographs. It is desirable to have application workstations at separate tables for maximum privacy. The workshop area needs to accommodate a required number of tables and chairs. A photocopier is essential for copying documents and applications. A kitchen is a desirable to provide volunteers with food and drinks.

Volunteer recruitment and role assignment:

The quality and dedication of staff and volunteers drives the success of the workshop model. The sponsor is preferably a charitable legal immigration agency offering its staff of attorneys and Board of Immigration Appeals

(BIA)–accredited representatives to: 1) organize the event and train volunteers, including attorneys who do not practice immigration law or are not experienced in naturalization law, 2) assist in completing naturalization applications, 3) back-stop volunteers by answering questions from immigrants on the spot, 4) conduct quality control reviews of all completed applications, and 5) take referrals for complex cases that are not appropriate for workshops.

Volunteers should be recruited with the help of volunteer coordinators from other organizations and lists of past volunteers. It is desirable to use volunteers who are comfortable in cross-cultural settings, adept in communicating in English with speakers of English as a second language, sensitive to people with disabilities or age-related problems, and nonjudgmental about people’s background and behavior.

Workshop sponsors need to ask volunteers what skills and interests they bring to the event. They should seek volunteers’ agreement to specific roles and provide written explanations of every role a volunteer is likely to play. In addition, workshop sponsors need to give volunteers a written confidentiality agreement to sign and date stating they will refrain from sharing details about an applicant by name or identifying information with anyone during or after the workshop. The exception is if a volunteer is seeking professional input from an assigned person in charge of quality control and making final decisions as to how an applicant should proceed.

Legal immigration experts from nonprofit organizations and private law firms are highly desirable volunteers. Attorneys in good standing with the local bar association are also valuable in assisting with the completion of applications. Those with experience can monitor quality control. However, non-immigration attorneys may not know immigration or naturalization law and need detailed training just like any other volunteer. It also cannot be assumed that even immigration attorneys know all the important points of naturalization law, regulations, and policies. This is especially true when assisting unique populations with special circumstances or needs, such as refugees, low-income applicants requesting fee waivers, the elderly who may be eligible for an English-language waiver, the disabled who require a Medical Certification for Disability Exceptions (N-648), or persons with criminal convictions.

Teachers of English as a second language (ESL) are a second group offering dedicated, highly qualified workshop volunteers. They see the workshop as a logical extension of their professional goals. With training, they can be competent application assistants. Their participation also facilitates referrals to ESL and citizenship classes. Overall, the high standing and earned respect of these teachers within the immigrant community is an asset to the reputation of the workshop.

It is generally favorable to have a USCIS public information officer or adjudication officer present at a workshop. USCIS participation can be a draw for people, especially those who do not have legal representation, but need information. Organizers of workshops should be in agreement on whether to have USCIS officers attend and in what capacity. Their presence should be clearly indicated with a sign and nametags. Officers should explain their workshop role and its limits.

A USCIS presence at each workshop helps the agency fulfill its community information mission and promotes improved working relationships between government and community-based organizations. Furthermore, it gives USCIS an opportunity to see the immigrant population at one of its best moments, applying for citizenship with community volunteer support.

Training:

A well-developed training program greatly assists in keeping volunteers active and satisfied with their contributions. Insufficient or sporadic training can result in high turnover. Even worse, poor training can result in a misinformed applicant, which could possibly lead to the applicant's detention or removal from the country.

The sponsoring agency should take responsibility for training. Co-trainers can be recruited from the local bar association, the membership of the American Immigration Lawyers Association (AILA), or the roster of USCIS naturalization adjudication officers.

It is best to give volunteers repeat training opportunities before their first workshop and to provide them with written materials explaining eligibility requirements and the application process. Training should cover: 1) the sections of the Immigration and Nationality Act related to naturalization, 2) naturalization ineligibilities, 3) the different versions of Lawful Permanent Resident cards, 4) a step-by-step review of all questions on the N-400 and N-600 forms, 5) the responsibilities of the different stations in the workshop process, 6) lines of supervision for assistance and quality control, and 7) information on accessing Selective Service, English and naturalization classes, immigration attorneys, court records, FBI records, the USCIS office, and the passport office. Volunteers should not be permitted to complete applications unless they have attended training on all these topics.

At minimum, inexperienced volunteers can receive training the night before a workshop and come early the day of the event for a quick review. First-time volunteers should shadow someone with experience for one or two application interviews. It is important to get the feedback of first-timers, no matter how briefly, before they leave the workshop.

All volunteers should be encouraged to seek on-the-spot consultation from an expert assigned to conduct quality control. The applicant needs to be included in the consultation, with an interpreter if necessary. All volunteers should have formal and informal opportunities to give feedback to the workshop's sponsor.

Outreach:

Outreach is essential for idealistic and practical reasons. It promotes citizenship, educates about the benefits of citizenship, and informs potential participants about the workshop, date, and documentation requirements. A communication effort also helps ensure that enough people will attend to make the workshop effective and efficient.

Outreach is a responsibility shared by the sponsoring and cosponsoring agencies, volunteers and their employers, non-English and immigrant-focused media, and public and private social-service providers that work with the immigrant community. A workshop coordinator continually updates and expands the list of outreach contacts and records where contacts were made prior to the event.

Since an efficient workshop depends on applicants' foreknowledge of citizenship eligibility requirements so that they arrive prepared, the most effective outreach is in writing. A flyer or bulletin, rather than a radio or TV announcement, allows prospective applicants to read and retain important details about citizenship and the workshop. A flyer should include: 1) a logo and heading that clearly presents the purpose of a naturalization application workshop, 2) date, time, and location, 3) names of sponsoring agencies, 4) phone numbers to call and pre-register, 5) workshop application fee indicating accepted forms of payment, 6) total USCIS fee that must be paid by check or money order, and 7) necessary documents, such as Alien Registration Card, "green card," past and current passports or travel documents with entry and exit dates from the United States, dates and addresses of residences and employment in the past five years, and data for spouse or former spouse and children. It is best to include the date of the next available workshop in case the current date is inconvenient for the applicant.

Forms, documents, materials, and supplies:

A naturalization workshop is paper intensive. It is advisable for a workshop coordinator to have a checklist for the items below and collect a sufficient number of them in advance, particularly immigration forms.

Key USCIS forms include N-400, N-600, and N-648. Multiple copies of the forms can be ordered by dialing the USCIS Forms Request Line at 1-800-870-3676. This automated recording service asks that the caller select the type of form(s) needed and give the name of the person making the request and a mailing address. Forms typically take

five to ten days to be processed in addition to several working days for U.S. Postal Service delivery. They can also be downloaded from the USCIS website at <http://uscis.gov/graphics/formsfee/forms/index.htm>. The Application for Naturalization (N-400) is located at <http://uscis.gov/files/form/N-400.pdf>.

The sponsoring agency should create N-400 and N-600 attachment sheets for extra information that does not fit on the application form. Attachment sheets must include headings for the applicant's name, Alien Registration number (A #), and type and section of form.

Two final, necessary forms: Every applicant should be given a written disclaimer about services performed and not performed, signed by the sponsor's immigration director and the registered applicant. Copies should be made for the applicant and workshop sponsor. In addition, workshop sponsors should have on hand an advisement form that indicates why an applicant is warned not to apply for naturalization until legal counsel has been secured or stated ineligibilities have been overcome.

Among the documents and literature to have available are the Immigration and Nationality Act, reference documents such as the Code of Federal Regulations (Section 8), USCIS's *A Guide to Naturalization* (M-476) and its list of 96 U.S. history and government questions and answers, sponsoring agency training books, naturalization self-study guides for the English, history, and civics tests, and translated study materials.

Necessary materials include receipt slips for checks and cash, signs for the front door and individual workshop stations, volunteer and applicant registration sheets, intake sheets, flyers for future naturalization workshops, referral lists to English-language and naturalization classes and charitable legal immigration services, naturalization audio-visual training materials, and business cards.

It is important to have the following supplies on hand: Notepads, pens, pencils, markers, post-it notes, a camera, film, batteries, photocopy paper, photocopy toner, nametags, an audio-visual player, mailing envelopes addressed to USCIS, workstation checklists, numbered tickets (with time slots if morning and afternoon sessions are scheduled), food, beverages, plates, cups, and eating utensils. It is wise to have someone on hand to make simple repairs to the photocopier and camera.

The Naturalization Application Workshop Event

The workshop is a lesson in crowd control. People will arrive before the workshop starts and after it is scheduled to end. A policy should be set for those arriving very late. Every workstation is set up with tables, chairs, and supplies and clearly marked with signs prior to the doors opening. The registration table is the first station that applicants reach, inhibiting them from progressing further until all registration and intake matters have been completed.

Guiding applicants through the stages of a workshop with signs, a checklist, and polite verbal instructions will help everyone navigate the process. The checklist should list each workstation in progression and have space for a checkmark. Applicants carry the checklist from station to station, receiving checkmarks from volunteers after completing each stage. By connecting signs with stages on the checklist, applicants will know where to go next and be able to gauge the time required to complete, review, and copy the application before the workshop ends. The workshop sponsor should take notes on what was not prepared properly to make corrections for the next event.

A table should be set where volunteers sign in ahead of time, giving their name, organization, address, phone number, e-mail, and fax number. This information allows the coordinator to send thank-you letters and flyers about the next workshop. Volunteers receive and wear nametags and are assigned a workstation. Coordinators should know how many hours each volunteer is able to spend at the workshop, ensuring backup when volunteers leave.

Stage One: Registration and Intake

Ideally, every applicant will have pre-registered in person or by phone, receiving specific instructions on eligibility requirements and documents needed to complete the application. For workshops with high registration numbers, registered applicants should be assigned to morning or afternoon sessions to avoid a crowded waiting room of increasingly frustrated applicants waiting their turn. Pre-registered applicants should be given priority in line for application assistance. This benefit, and possibly a reduced pre-registration fee, should be an incentive to pre-registering. If the policy allows, unexpected walk-ins should be accepted graciously until the hour of open registration ends.

At the registration table, applicants pay the workshop fee and receive a receipt. They also receive an 8 x 11 envelope with a number indicating where they are in the queue to meet an application assistant. The envelope contains the checklist, an N-400 application, a referral list

for English and naturalization classes, and any other printed information the sponsoring agency wants the applicant to take home.

Intake includes a simple assessment of the applicant's English and literacy skills and a determination of general eligibility. Applicants deemed ineligible need to speak with a naturalization expert to confirm if an ineligibility exists and if, how, and when eligibility can be achieved. A person with a permanent bar is discouraged from applying for naturalization and told how to avoid being placed in removal proceedings. If needed, an appointment is made for an in-office consultation.

At intake, the sponsoring organization takes key biodata information deemed necessary to update the client's file as well as the agency's database and mailing list. The information will likely include name, address, day and evening phone numbers, email address, nationality, age, gender, immigration code indicating how Lawful Permanent Resident status was acquired, or any other information useful to the sponsor's parent organization or funder. Here is a good opportunity to ask applicants their reasons for wanting to become citizens. The answers can be written, tallied, and analyzed.

After intake, applicants are assigned to sit in a general waiting area for their number to be called to meet with an application preparer. The waiting period is a good time for people to meet with a USCIS officer if one is in attendance. Alternatively, if conducive to the workshop atmosphere, a verbal presentation can be given or a video played, offering important information about the naturalization interview or other pertinent matters.

Stage Two: Application Assistance

At the second station an applicant is met by a trained volunteer application preparer. Preferably, the preparer and applicant have some privacy and are seated away from other applicants. The preparer reviews the intake sheet to verify registration, payment, and status. All supporting documents for the application are reviewed. Preparers remind applicants of the waivers they signed and repeat the importance of total honesty and the consequences of providing false or misleading information. After entertaining any immediate questions from the applicant, the preparer begins to complete all sections of the N-400.

The preparer addresses problems such as previous arrests and convictions, lack of child support payment, or evidence of the failure to register for Selective Service. (Males between the ages of 18 and 26 may go to their local post office to register or may register on-line at www.sss.gov.) The preparer asks the applicant if he or she

has any plans to change addresses while the naturalization process is underway, advising the applicant how to send proper change of address notification to USCIS.

If confusion arises, the preparer asks for on-the-spot assistance from an expert who is roaming the room. Unresolved questions or problem areas, also known as "red flags", are noted for the expert at stage four who will do the final review. (See *Citizenship for Us: A Guide to Naturalization*, produced by the Catholic Legal Immigration Network, Inc., or CLINIC, for details on completing the N-400 and the naturalization process.)

Lastly, applicants are asked to reaffirm the veracity of all their responses, and sign and date the application. Then, the preparer signs the section asking for the preparer's name, signature, and affiliation. The preparer marks the checklist and, if the application is completed, directs the applicant to the area where photographs are taken. (To prevent film and money from being wasted, photographs are not taken before an application is completed, in case ineligibility is determined.)

Stage Three: Photographs

A volunteer familiar with USCIS photograph requirements has an applicant stand before a blank white background and takes two, full-face, side-by-side images. Applicants should be informed beforehand to look their best, as the photograph will appear permanently on their naturalization certificate. Once the photograph is dry, the volunteer writes the applicant's full name and alien registration number twice on the reverse, once on each side of the picture. The photograph is placed in the applicant's envelope and the applicant is instructed to go to stage four to receive a final review.

Stage Four: Final Review

The importance of final review cannot be overstated. Also known as quality control, final review requires the expertise of a naturalization expert, such as an immigration attorney or BIA-accredited representative with knowledge of naturalization law, USCIS regulations, policies, and procedures, and the unique needs of special populations who frequently seek assistance at workshops.

At final review, the expert examines eligibility documents, reaffirms English-language skills and the accuracy of each statement, ascertains that forms are completed, makes a determination on tagged "red flag" issues, and corrects any errors by volunteers. Typical errors include reading the green card's adjustment of status incorrectly, failing to list residence, employment, and travel dates in reverse rather than chronological order, failing to list travel dates according to visa stamps in passports, failing to list the

Alien Registration number at the top of each N-400 page, failing to list the Alien Registration number, name, and form type on all attachments, and skipping a question or writing illegibly.

The expert informs the applicant of the pending USCIS biometric fingerprint appointment, its purpose and consequence, the typical wait for a naturalization interview and how to prepare, and citizenship follow-up benefits and services. Applicants are told where to receive help if USCIS sends a request for more information or the need for legal representation arises. The applicant asks any final questions, the checklist is marked, and the applicant is directed to stage five for packaging the application for filing.

Stage Five: Application Packaging

At this last stage, immigration forms, attachments, and the Alien Registration Card are photocopied. A photocopy of the Alien Registration Card is mailed with the N-400 application. Original documents should not be mailed. Photocopies of the forms are given to applicants for their personal records and are useful in case USCIS loses the mailed application. The sponsoring organization retains another set of copies for record keeping and in case further assistance is requested. Forms with original signatures are filed with USCIS. The applicant receives a pre-addressed mailing envelope for the appropriate USCIS Service Center that has jurisdiction over the USCIS district office where the application will be adjudicated. Applicants are responsible for mailing the application with the appropriate postage. Certified mail is highly recommended in order to obtain a return receipt. It is not advisable for workshop sponsors to mail application packages.

Stage five is a good point to distribute naturalization study materials and other information beneficial to the immigrant community. Applicants should be encouraged to make an appointment for post-naturalization services such as assistance with the Application for Certification of Citizenship (N-600), passport application, petition for alien relative, voter registration, and possible training to help at future naturalization workshops, English classes, naturalization classes, and test-preparation classes. Finally, applicants should be encouraged to contact the sponsoring office when citizenship is granted so pass rates can be tallied and the success of the workshop verified. A phone call from the sponsoring organization to the applicant at the expected time of naturalization is also a good way to verify success.

Follow-Up for Volunteers and Applicants

Appointments are made for applicants who have legal and language barriers to naturalization. Follow-up calls are made to applicants who were referred to English and naturalization classes and mock naturalization interview sessions, encouraging them to attend. Thank-you letters are sent to location host, staff, volunteers, USCIS, in-kind sponsors, and funders. First-time volunteers are called to get feedback on the workshop experience and to determine if additional training is needed.

Conclusion

Experts in delivering naturalization workshops need to share best practices using the model outlined above and similar models. Funders should take note of the workshop model's benefits to immigrant communities, service organizations, and civic-minded volunteers. Workshops themselves are not costly but require the time and talent of immigration experts to conduct outreach, train volunteers, and provide the needed supportive services, such as English and citizenship classes, test preparation and naturalization interview sessions, and advocacy.

The naturalization group application workshop is a crucial component of a national citizenship program. It has proven to be an efficient and successful way to promote naturalization and deliver naturalization services. The naturalization workshop is a testament to our nation's immigrant heritage and affirms the belief that citizenship should be accessible and all-inclusive.

RECOMMENDATIONS FOR FUNDERS

Workshop supporters can fail individual applicants and the community if they prioritize only by the number of applicants served. Funders should not weigh numbers too highly and overlook the many other benefits achieved. Factors funders should consider include:

- 1 Which organizations provided citizenship outreach?
- 2 Which organizations acted as workshop supporters?
- 3 How many volunteers per applicant were in attendance?
- 4 Were USCIS officers at the workshop to respond to immigrant inquiries?
- 5 How many immigrants registered for the workshop?
- 6 How many registered immigrants came prepared to complete the application?
- 7 How many applications were completed? What is the ratio to the number registered?

- 8** How did the ethnic representation of applicants compare to neighborhood demographics?
- 9** How many immigrants were identified as permanently ineligible and would have been at risk if they applied on their own?
- 10** How many immigrants were identified as currently ineligible but eligible in the future with the help of legal consultation, English or civics classes, or other supportive services?
- 11** How many immigrants successfully accessed supportive services later?
- 12** How many low-income immigrants were assisted with application-fee waivers?
- 13** How many immigrants were identified as potentially requiring a disability waiver?
- 14** Did the workshop gain any media attention?

RECENT NATURALIZATION AND CITIZENSHIP PROJECTS: LESSONS LEARNED FOR A NATIONAL CITIZENSHIP PROGRAM

Ten of the most recent large-scale citizenship projects illustrate the need for comprehensive naturalization services nationwide. Each project has been implemented by a nonprofit organization supported with funding from the federal or state government or a philanthropic foundation. While all the projects share the goal of naturalizing large numbers of immigrants, each is unique in funding source, populations targeted, range of services provided, and level of immigrant civic participation.

Common to all the projects is their recognition of immigrants' desire to be U.S. citizens and need for specialized naturalization services. The qualitative and quantitative successes of eight are described, as well as the challenges confronted. Recommendations for a national citizenship program, based on lessons learned, conclude each section. The outcomes of the two newest projects are not yet known, but they exemplify critical ongoing efforts.

Also common to all projects is their brief duration because of limited funds, funders' short-term goals, or political intervention. While the initiatives speak to the nation's belief in the importance of citizenship, they also reflect its inconsistent and fragmented approach to citizenship and its failure to maintain a high priority for naturalization and citizenship services.

Immigration and Naturalization Service – Citizenship USA

Beginning in 1993, the United States experienced a sudden and rapid increase in naturalization applications not seen since the early years of the twentieth century. The rise is attributed to a convergence of unique factors. First, a large number of immigrants who gained Lawful Permanent Resident status through the Immigration Reform and Control Act of 1986 became eligible for naturalization. Second, in 1989 the Immigration and Naturalization Service (INS) required Lawful Permanent Residents to replace their green cards every ten years, which induced many to consider applying for citizenship

beginning in 1999. Many preferred to pay \$225 for citizenship and the sense of permanency it provided, than pay \$110 to renew the green card. Third, when California's Proposition 187 passed in 1994 during an economic recession, some elected officials focused on undocumented immigrants as a drain on public funds. The proposition thus targeted undocumented immigrants by denying them public services, such as schooling and health care. Although immediately challenged in court and declared unconstitutional, the proposition's passage by 59 percent of California voters gave even Lawful Permanent Residents cause for concern about their future without the security of citizenship. These fears proved well-founded: In 1996 the U.S. Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act, also known as the Welfare Reform Act, which placed restrictions on legal immigrants' access to public benefits. These restrictions would usher in a separate, yet almost congruent, surge in naturalization applications starting in 1996.

In fiscal year 1992, the INS received 342,438 naturalization applications. During 1993 the number surged to 521,866 and in 1994 to 543,353.¹ INS could not keep pace, resulting in a pending caseload that increased from 135,652 in 1992 to 481,580 in mid-1995.² INS district directors expressed concern that the average processing time of six months was not feasible given the backlog of naturalization applications.

On August 31, 1995, INS Commissioner Doris Meissner announced the Citizenship USA (CUSA) initiative with the goal of reducing processing periods to six months by mid-1996. CUSA efforts targeted five districts with the largest backlogs—Los Angeles, New York, San Francisco, Miami, and Chicago. INS launched mass media campaigns promoting naturalization.

Critics of CUSA, including some members of Congress and a few INS district officers, accused the initiative's planners in the White House and INS headquarters of using backlog reduction as a pretense for naturalizing large numbers of likely Democratic voters for the upcoming election in 1996. A later investigation by the Office of Inspector General (OIG) found no evidence that CUSA and its targeted cities were selected for this purpose.

Other criticisms of CUSA and INS were found to be true. Media reports drew attention to INS's inability to cope with accelerated production goals and problems with its internal systems. In September 1996 the Subcommittee on National Security, International Affairs, and Criminal Justice of the House Committee on Government Reform and Oversight convened the first of a series of hearings on CUSA. The subsequent OIG investigation found the integrity of naturalization processing and adjudications to have suffered under the expanded naturalization initiative.

The OIG report criticized INS for: 1) superficially training staff to adjudicate a high volume caseload despite some problematic naturalization cases, 2) failing to ensure that adjudicators had applicants' files in-hand for review while conducting naturalization interviews, 3) using multiple databases that did not automatically share information, 4) using inconsistent methods to deliver the English, U.S. history, and civics tests, 5) failing to provide written guidance, monitoring, and enforcement to community-based organizations, which gave rise to unwarranted practices, particularly in the use of contractor testing centers, 6) failing to provide guidance for determining denials based on "lack of good moral character" grounds, and 7) approving some applicants for citizenship before the FBI had responded to the fingerprint check and confirmed that no criminal history existed.

Even though the numbers involved were extremely small, members of Congress particularly decried the granting of citizenship to a few applicants with prior criminal records that made them ineligible. Congress also bemoaned INS's failure to comply with its demands to use funds from the Examinations Fee Account for backlog reduction. At the same time, congressional staff heard repeated complaints from immigrants in their districts about long delays for interviews and lost applications, further exacerbating relations between INS and Congress.

The investigations resulted in INS instituting naturalization quality procedures in November 1996 and quickly implementing them to address each of the criticisms. INS subsequently corrected all of the problems to the OIG's satisfaction with two exceptions—the lack of standardization by district officers in administering the naturalization test and the lack of uniform guidance when evaluating applicants' "good moral character."

RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PROGRAM

- 1 Any President seeking to promote naturalization must recognize the potential for opposition by political opponents and anti-immigrant groups. To avoid damaging criticism and distracting debates, the administration needs to secure bipartisan congressional support, clearly state its motivations for a national citizenship plan, make its methods transparent, and acquire public and private partnerships for efficient and effective implementation.
- 2 Congress needs to acknowledge the struggles of immigrant consumers seeking fee-based immigration status, including naturalization, and provide strong oversight of the U.S. Citizenship and Immigration Services (USCIS), which inherited these INS functions, to ensure that adjudication of applications is based on timely processing and well-established deadlines without high fee increases.
- 3 Congress needs to authorize USCIS to use its fee account in flexible ways to meet processing deadlines. Such flexibility is especially important when competing priorities occur as a result of new congressional legislation. USCIS's fee account needs to have protection from other Department of Homeland Security (DHS) interests, particularly immigration law enforcement and expanding national security initiatives.
- 4 USCIS must maintain naturalization quality-control procedures and implement internal controls to reevaluate and raise its processing standards to ensure integrity and deliver efficient and effective services.
- 5 USCIS needs to maintain its credibility with Congress in how it uses fees and reprogramming request funds by demonstrating that it has strong internal financial and programmatic controls and accurate reporting mechanisms on results achieved.
- 6 USCIS needs to report accurately to Congress on what it requires in funding to meet any expected surge in naturalization applications under a national citizenship implementation plan, especially if other immigration benefits are expanded through legislation.
- 7 USCIS must establish guidance to its district offices on ways to partner with community-based organizations in: outreach, media campaigns, naturalization training of legal staff and volunteers, application group processing

workshops, off-site adjudication in immigrant-impacted communities more than 100 miles from the district office, naturalization oath ceremonies, and liaison meetings, which should feature an agenda shared by USCIS officers and immigrant-supporting organizations.

Immigration and Naturalization Service – Naturalization Pilot Project in Southern California

As a record number of naturalization applications were filed in 1995, the INS, under the auspices of the Department of Justice's Office of Justice Programs, entered into a cooperative agreement with the Catholic Legal Immigration Network, Inc. (CLINIC) to conduct a naturalization pilot project in southern California. The project was the first and only one of its kind—utilizing federal discretionary dollars to support charitable legal immigration programs in providing full-service naturalization assistance and partnering with INS to test application-processing innovations.

The pilot project was launched in September 1995 and concluded in December 1996. Funding totaled \$500,000. CLINIC entered into a Memorandum of Understanding with three of its member agencies' legal immigration programs: Catholic Charities of Los Angeles, Catholic Charities of San Diego, and Catholic Charities of Fresno. The three communities were selected based on where the largest number of naturalization-eligible Lawful Permanent Residents lived. The three member agencies were selected because of locale, well-established experience in providing naturalization services, and their certification by the Board of Immigration Appeals (BIA) as recognized charitable legal immigration programs that have experienced staff attorneys and BIA-accredited representatives.

The broad goals of the project included: 1) educating immigrants on the rights and responsibilities of citizenship, 2) improving the quality of applications submitted, 3) improving the preparedness of applicants for the citizenship interview, and 4) streamlining the process by assisting INS with pilot processing procedures.

Clear objectives were also set, including: 1) informing potential applicants about the requirements and process of naturalization, 2) developing creative ways of providing information to potential applicants in group sessions, 3) securing community support and organizing events to encourage applicants in the naturalization process, 4) assessing applicants' ability to speak, read, and write English and their general knowledge of U.S. history and government, 5) conducting English and civics classes and coordinating with education programs that offer such services, 6) maintaining accurate records tracking applicants' progress through educational programs,

7) developing innovative ways, with INS approval, of filing naturalization applications using state-of-the-art electronic systems, and 8) providing follow-up education to newly naturalized Americans on citizenship responsibilities.

CLINIC and its member agencies worked together to conduct extensive outreach through mass media public service announcements, flyers, town hall meetings, presentations at houses of worship, and contacts with English and citizenship teachers. Applications were completed through either individual appointments or group processing application workshops, which are preferred because they maximize community resources for the greatest numerical result. Model instructions for workshops were established and used to train other community groups sponsoring workshop events. Applicants were screened for language ability using preexisting testing tools created by educational centers under contract with INS to conduct off-site naturalization testing. Tracking systems were implemented to record outcomes for reporting purposes and to identify applicants in need of additional services, particularly the elderly, the disabled, and those with limited English proficiency.

In collaboration with community-based organizations, new citizens were offered information and assistance on voter registration, jury duty, and other civic activities, including volunteerism, support of youth education and local schools, community organizing efforts to improve government services, and neighborhood crime watch. New citizens also received information on employment anti-discrimination laws and home ownership opportunities.

The collective results are impressive. In a 16-month period, over 97,000 immigrants in Los Angeles, San Diego, and Fresno received information on naturalization requirements and responsibilities. The three Catholic immigration programs and community partners hosted 211 group processing application workshops, attended by 11,142 Lawful Permanent Residents and resulting in 9,534 filed naturalization applications. (Thousands more immigrants sought to become citizens but were screened out of the pilot project due to insufficient language skills and statutory ineligibilities.) Catholic Charities of San Diego convinced the local Social Security Administration office to take a new step by sending letters promoting naturalization to the elderly and disabled who expected to lose public benefits as a result of the welfare reform laws enacted in 1996.

Of those needing naturalization test preparation, 2,499 people enrolled in English and civics education classes. Community groups helped organize 43 naturalization oath ceremonies. The three Catholic immigration programs documented a naturalization pass rate for their clients that averaged 90 percent, a higher rate than INS's estimated rate of 75 percent for all applicants nationwide.

As part of this unique and productive collaboration, CLINIC's member agencies also assisted INS in pilot testing new application-processing procedures. In one effort, Catholic Charities of Los Angeles, with encouragement from the INS Los Angeles district director, completed naturalization applications electronically using INS-supplied software that produced a two-dimensional bar code containing the data for each application. Once the applications were coded, Catholic Charities of Los Angeles mailed them to the INS California Service Center, where staff scanned the bar code and uploaded the data automatically into INS's "claims" software system. INS studied the results, noting that manually keying application data took five minutes while processing the bar-coded package took only three minutes. In a memo to CLINIC, INS described the bar code process and the collaboration with Catholic Charities of Los Angeles as "an invaluable resource."

The collaboration also allowed INS to test a direct mail procedure that was later adopted nationwide. Previously, staff at INS district offices, where applications were mailed and processed, often complained that they were overburdened by the combination of clerical work, public walk-in queries, and adjudicating a high volume of applications. As part of the pilot program, applications were sent to the California Service Center's large facility, where trained mailroom and data entry clerks could process applications much faster and more accurately. After correcting minor problems, INS determined that direct mail to a service center was a success. Currently, all naturalization applications and some other immigration status applications are sent to the four service centers.

A third collaborative pilot program used INS officers in Fresno to test applicants' English ability and knowledge of civics prior to filing an application. (INS has unofficially suggested to community-based organizations that the majority of naturalization denials are due to English language deficiencies.) Pre-assessment of applicants' English ability and civics knowledge by a trained INS officer benefited immigrants who otherwise would have applied, endured a long wait, been denied, and lost the application fee. Applicants who were likely to be denied were able to improve their chances of passing by attending citizenship classes, while INS had fewer ineligible applicants to process and interview. USCIS and the Office of Citizenship are considering a similar concept of up-front testing as either a voluntary option or a prerequisite for submitting a naturalization application.

In a fourth effort, Catholic Charities in all three cities helped INS conduct naturalization interviews away from its district offices, much to the enthusiasm of community groups. Applicants who were especially appreciative included the elderly and disabled, those living far from the downtown federal building, persons needing professional interpreting by immigration service agencies or free

parking, and those fearful of government offices. INS district offices in other parts of the country had occasionally conducted off-site interviews, but under the pilot project, INS encouraged the district offices to hold interviews and oath ceremonies off-site more routinely. Unfortunately, despite their popularity with clients and community groups, the Los Angeles and San Diego district offices recently ended off-site interviews, citing their lack of efficiency, a concern echoed by USCIS. Although charges of inefficiency remain only anecdotal, off-site interviews are now scheduled around the country in far fewer numbers and with less frequency, due to the lack of USCIS encouragement or instruction.

Concurrent with the pilot project, all three Catholic Charities operated as naturalization testing sites under subcontract to INS-approved contractors. This separate initiative allowed naturalization applicants to go to INS-contracted sites to take English and civics tests and be certified as passing, instead of being tested by an INS officer at the district office. Unfortunately, INS improperly implemented the initiative by failing to stringently define subcontracting eligibility requirements. It permitted contractors to subcontract with unqualified and inexperienced for-profit and noncharitable organizations who were not BIA-recognized. After the media and federal investigators uncovered fraud, INS ended the initiative in 1997. It is important to note that no allegations of impropriety, let alone fraud, were lodged against charitable groups with a mission to serve immigrants. Canceling all the subcontracts, even those with Catholic Charities and other nonprofits that have unblemished reputations, severed an important programmatic relationship with immigrant clients and overshadowed the benefits of the off-site testing initiative.

Ending off-site testing and curtailing off-site interviews exemplify how INS collaboration with community groups eroded after the Citizenship USA campaign ended amid charges of gross incompetence. Neither the now defunct INS nor USCIS have made efforts to reengage the private sector in promoting citizenship and delivering naturalization services based on the positive outcomes of the 1996 pilot project in southern California. Consequently, with the exception of the Office of Refugee Resettlement, the federal government has produced no significant initiative to help make Lawful Permanent Residents citizens of the United States. This failure is an important reason for a national citizenship implementation plan to be adopted and put into action.

RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PROGRAM

- 1 USCIS must continue to improve its processing of all immigration benefits applications so that a significant rise in naturalization applications does not produce backlogs beyond the generally accepted six months.
- 2 Congress needs to recognize that USCIS should have full access to its fee account, rather than diverting funds for purposes other than processing applications. It should give USCIS a degree of flexible spending authority to make adjustments in staff and technology resources as surges in various types of applications occur, which historically happens when Congress passes immigration laws without appropriating funds for implementation.
- 3 USCIS needs to make it a priority for the Office of Citizenship to receive grant-making authority from Congress and appropriations sufficient to fund naturalization programs through contracts that are renewable for multiple years.
- 4 USCIS needs to seek congressional monies to select and support BIA-recognized agencies in widely promoting citizenship and providing naturalization services on a level comparable to the INS Pilot Project in southern California.
- 5 The Office of Citizenship needs to work with other federal agencies, particularly the Office of Refugee Resettlement, to identify how their funding can be coordinated and to encourage funding of citizenship programs to community-based organizations.
- 6 USCIS needs to issue guidance to its field office directors to communicate routinely with BIA-recognized agencies and other community-based immigrant service organizations that provide valuable contributions and conduct regularly scheduled meetings on shared agendas.
- 7 USCIS needs to partner with community groups serving the immigrant population and identify how the partnerships can help pilot new government services benefiting its immigrant customers.
- 8 The federal agency awarding naturalization contracts must have sufficient funds and staff resources to conduct on-site monitoring to ensure adherence to the contract and quality services to immigrant customers.
- 9 Charitable immigration programs need to replicate best models of past naturalization projects and look soberly at how past problems arose within federally contracted partnerships.
- 10 USCIS should offer up-front English and civics testing for applicants wishing to assess their capacity to pass the test without having to pay, and possibly lose, the full fee.
- 11 USCIS should encourage its district offices to conduct off-site naturalization interviews, particularly for groups in greatest need, as a means to improve relationships with community service organizations.
- 12 USCIS should encourage community groups to participate in oath of allegiance ceremonies and administrative oath ceremonies in federal buildings.

The Open Society Institute – Emma Lazarus Fund

On August 22, 1996, Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act, more commonly known as the Welfare Reform Act. The act was promoted as a means to bring more welfare recipients into the labor force by changing the rules of eligibility and broadening local government control over work placement incentives. It was also promoted as a way for the federal government to save money by cutting public benefit programs for the poor. A significant piece of the legislation was to deny noncitizens, including millions of current legal immigrants and refugees, public benefits (Medicaid, Temporary Assistance to Needy Families, food stamps, and Supplemental Security Income for the elderly and disabled) as of the law's enactment date.

Although the Welfare Reform Act was presented to the public as a way to improve the welfare system and lead more people into jobs and self-sufficiency, it became a vehicle for restrictive immigration legislation and a means of cutting the federal budget by punishing immigrants who were mostly elderly and disabled and unable to work. Even though most studies indicate that immigrant families, other than refugees, do not use public benefits at a higher rate than native-born families, the law sought to remove low-income noncitizens, even the working poor, from the rolls of those receiving medical assistance and food stamps. The law eliminated coverage for millions of poor immigrants and was projected to save \$53.4 billion over the first six years, with 44 percent of the savings coming from the denial of benefits to noncitizen, legal immigrants.³

While many decried the welfare reform law and its anti-immigrant stance, no reaction was as striking as that of billionaire, immigrant philanthropist George Soros. Shocked and dismayed by Congress's discrimination against poor immigrants, Soros donated \$50 million of his private assets to his foundation, the Open Society Institute (OSI). He instructed OSI to establish a fund to disburse the \$50 million to charitable organizations that would reestablish public benefits eligibility for legal immigrants by promoting citizenship and delivering naturalization services, including outreach, legal representation, and English language and naturalization test preparation courses. Additionally, the monies went to advocacy organizations focused on immigrants and public welfare.

The campaign was named the Emma Lazarus Fund (ELF), in recognition of the Jewish American poet whose words are inscribed at the base of the Statue of Liberty:

*Give me your tired, your poor
Your huddled masses yearning to breathe free,
The wretched refuse of your teeming shore,
Send these, the homeless, tempest-tost to me,
I lift my lamp beside the golden door!*

In addition to spotlighting the unjust impact of welfare reform on lawful immigrants and refugees, Soros's donation emboldened the immigrant and public welfare advocacy communities. Quickly, charitable organizations set to the task of reaching the most vulnerable immigrants and completing their naturalization applications. ELF-funded advocacy groups and public policy centers were crucial in bringing hardship cases to the attention of Congress, including urgent messages from constituents asking for benefit restoration. Reports appeared in the media of immigrants committing suicide in fear of losing their homes, losing medical care, or going hungry. Many of the immigrants were political refugees who were brought to the United States on humanitarian grounds and had already suffered great personal loss and trauma.

Beginning in early 1997, ELF specifically supported organizations to: 1) target immigrants requiring naturalization for benefits reinstatement, 2) train more community service workers on the need for citizenship and the basic naturalization requirements, 3) conduct naturalization law training for legal practitioners, 4) advise the INS on improving its services to naturalization applicants, and 5) engage in legislative advocacy to restore welfare benefits and appropriate much-needed funds to the INS to improve its weak application-processing systems.

The fund determined that the most efficient mechanism to achieve Soros's goals was a re-granting strategy both to national organizations that had large and geographically dispersed networks of direct service providers and to community foundations that give directly to local groups. It made approximately \$13 million available to community foundations, which were encouraged to disperse matching funds, and \$9 million to national and regional service organizations.⁴ The largest single grant was made to CLINIC for \$3 million, which supported 56 Catholic charitable immigration programs in 25 states in submitting 43,000 naturalization applications for immigrants who were most at risk. Other entities benefiting included national pro-immigrant policy and advocacy organizations, state immigration coalitions, ethnic-based legal defense funds, ethnic-based mutual assistance associations, refugee resettlement agencies, and farm worker support organizations. By the end of 1999, OSI reported that its grantees had assisted over 500,000 immigrants to begin the naturalization process.⁵

OSI considered its re-granting strategy a great success because resources were delivered quickly and efficiently over a large territory to diverse, yet complimentary, organizations. For example, the Council of Jewish Federations distributed funds to 14 communities, National Council of La Raza to 27 affiliate locations, International Rescue Committee to nine refugee resettlement sites that filed 4,495 applications, and A Territory Resource to 20 groups in five states. One regional network, the Northern California Citizenship Project, funded smaller, less experienced organizations, in addition to well-established, BIA-accredited agencies.

The Emma Lazarus project confronted a number of obstacles. First, it was launched as a response to the negative consequences of harsh legislation that caused confusion and panic in the immigrant community and in the face of a backlash among anti-immigrant groups suspicious of immigrants' motives for choosing citizenship at that time. Second, the United States had not engaged in a naturalization campaign of such a magnitude, and the charitable legal immigration service infrastructure was challenged to accommodate the rising demand for naturalization assistance while maintaining large, complex caseloads for other immigration needs. Third, community groups with similar interests in immigrants but distinct services needed to build coalitions in a crisis mode. Fourth, the INS, still under investigation for its ill-planned Citizenship USA initiative, was using fragmented and outmoded computer and processing systems for a naturalization backlog of over 1.7 million applications, causing an average applicant to wait over two years for citizenship status. Fifth, during the rush for naturalization by the poor, INS announced a fee increase from \$95 to \$225, effective October 1998.

Nevertheless, the impact of ELF was profound. Congress backtracked and in the Balanced Budget Act of 1997 restored disability and health benefits to legal immigrants who were in the country and receiving benefits at the time of the initial welfare reform legislation. Many states that were impacted by immigration allocated supplemental funding to offset federal cuts hurting the most vulnerable.

During the initiative, the immigrant community received unprecedented levels of citizenship information and assistance. Charitable organizations expanded their service capacities with more trained staff serving record numbers of naturalization applicants. Coalitions were established to join nonprofit organizations through training, advocacy meetings, and conferences. Joint government and private working groups were set up, including the unique INS and Community-Based Organization Disability Working Group. Legal and benefits experts writing on naturalization broadened the knowledge of policymakers and direct service providers (see CLINIC's *Citizenship At Risk: New Obstacles to Naturalization* and Citizenship Now Collaborative's *Democracy on Hold: How the Citizenship Process is Failing Immigrants and Our Nation.*) National

and local philanthropies provided matching dollars to OSI support at historic levels for immigrant services. The Department of Health and Human Services' Office of Refugee Resettlement declared naturalization services a categorical social service and funded programs to assist refugees losing benefits. Government agencies like the Social Security Administration, Agriculture Department, INS, and local welfare offices responded more effectively to the concerns of the immigrant and immigrant-advocacy community through meetings with shared agendas. Thanks in great part to the outreach efforts of the National Immigration Forum and local agencies, the media carried more positive stories about immigrant contributions, values, and family bonds, in addition to their economic struggles after losing public benefits.

ELF is a unique experience in American social history. The best the United States has performed in promoting citizenship and delivering naturalization services in over 100 years was based upon one individual's generous response to the harsh decision by Congress to deny benefits to the foreign-born population. Its strengths were also its limitations: It depended solely on the enormous wealth and anger of one person who controlled a well-endowed and progressive foundation. Without implying any criticism of Soros or OSI, the campaign was short-lived and folded after the crisis subsided but the issues were not yet fully resolved. Although ELF's outcomes are too many to cover fully, lessons learned from this historic effort must be revisited in a national citizenship implementation plan.

RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PROGRAM

- 1 Congress needs to fully restore public benefits for immigrants at levels prior to the passage of the Welfare Reform Law of August 22, 1996, in order to de-link citizenship from the receipt of public benefits.
- 2 More champions must be identified and supported in their efforts to ensure that citizenship and naturalization services are the backbone of U.S. immigrant integration policy.
- 3 The federal government must show leadership in setting policies and appropriating sufficient funding to sustain model programs for decades and in proportion to our nation's immigration levels.
- 4 The President, congressional representatives, and state and local officials must join immigrant supporters in outreach to the immigrant community, speaking on the importance of naturalization and citizenship as essential to strengthening our democracy and nation.
- 5 The White House, Congress, and DHS must ensure that USCIS has the capacity to complete naturalization applications and oath of allegiance ceremonies within a

broadly accepted time period without compromising the integrity of the process or tarnishing the solemnity and celebration of the experience.

- 6 Nonprofit organizations that once benefited from ELF must institutionalize naturalization services and civic engagement for the foreign born in their mission statements, programs, and budgets, to highlight the importance of citizenship, the need for greater support, and their capacity to absorb a significant increase in public and private money when available.
- 7 Expanded funding, especially from the government, must recognize the efficient and successful delivery system used by ELF by adopting a re-grant method that targets national networks with numerous and geographically diverse affiliates delivering direct services, augmented by targeted giving to areas and populations that are underserved, lack sufficient service organizations, or pose the greatest need and challenges.
- 8 Key participants in ELF, especially those still engaged in naturalization issues, should reconvene with support from the Open Society Institute to evaluate OSI's and its subgrantees' progress reports for lessons learned, successes, and challenges for future endeavors.

The James Irvine Foundation — Central Valley Partnership for Citizenship

The James Irvine Foundation funded the Central Valley Partnership (CVP) for Citizenship between 1996 and 2003. A total of \$13 million supported a collaboration of 12 organizations to engage California immigrants in the civic life of their communities, including encouraging them to seek citizenship status.

The CVP project stands in sharp contrast to the predominant naturalization initiatives in immigrant-impacted metropolitan areas. Its activities were spread across a large geographic area in 17 semirural counties and served predominantly low-income Mexican and Hmong farm workers who spoke limited English. These characteristics, and the low rate of naturalization for both ethnic groups, make this project especially worthy of attention, as it speaks to the need for a national citizenship implementation plan to assist those who have the greatest need and the least available services.

The CVP's three primary objectives were: 1) to provide naturalization application assistance and English language training to immigrants seeking citizenship, 2) to promote active civic participation in the Central Valley, and 3) to enhance the leadership capacity and organizational resources of community organizations to address persistent problems affecting immigrants.

The project attempted to achieve the three objectives by funding 12 California Central Valley community organizations specializing in naturalization services, community organizing, or leadership and institutional development. A secondary objective was to bring these small organizations together into a collaborative network, supported by larger organizations that contributed special expertise. The Immigrant Legal Resource Center supported the service-providing organizations with technical assistance and was credited, along with the participating organizations, for the admirable outcomes in filing naturalization applications.

The collaborative network was unique in that it involved local grassroots organizations that understood the farm worker community, high quality legal service providers, and exceptional community organizers who held elaborate, quarterly meetings to coordinate on shared concerns. The generous funding allowed the groups to pursue their work seriously and generate good joint outcomes. The collaboration ensured that each organization understood and appreciated the impact that others were making as they worked together on broad, shared goals.

To expand access to naturalization application assistance, five of the 12 organizations conducted roving naturalization workshops at least once in each of the 17 counties. The roving workshops brought application assistance to remote communities where legal immigration services were not consistently available to agricultural laborers working long hours. Individual application assistance by appointment was also offered at the five organizations. Importantly, a follow-up study showed that 80 percent of the applicants rated the assistance as “excellent.” According to the Aguirre Group, which evaluated the project at the midway point and released a report in 1999, funding for the CVP project supported the filing of 10,000 naturalization applications. In addition, the evaluators estimated that 3,500 beneficiaries, or minor children, would derive citizenship from a naturalized parent. After controlling for the possibility of duplicated numbers, both the providers and evaluators considered these figures as a success.

The evaluators recommended that similar projects in the future begin with a baseline of eligible Lawful Permanent Residents by zip code to track applicants against the total number of persons eligible to apply. They also suggested that funded organizations follow well-defined service and outcome definitions entered into a central reporting system to avoid reporting or duplication errors. (CLINIC adopted this recommendation for its Florida Refugee Naturalization Project described later in this chapter.)

Because of naturalization processing backlogs in the mid 1990’s, the CVP project had little data on the success rate of applicants who had taken the naturalization examination. According to Aguirre, of those who had reported the

outcome at the midway point, 53 percent passed, while 47 percent had been continued or denied. The national average pass rate at the time was around 75 percent according to INS estimates, but given the target population’s exceptional needs, the success rate was not considered too discouraging, especially since no data was collected on the percentage of those who passed after taking the second, and final, examination. Those who passed were typical of the overall CVP target population, except for their language ability. For those who failed, communicating successfully with the examiner in English was the most common problem noted. This deficiency speaks to the importance of English as a second language (ESL) for naturalization purposes and the benefits of mock-interview practice sessions.

The majority of applicants for citizenship were Mexicans who had acquired Lawful Permanent Resident status as a result of the Immigration Reform and Control Act of 1996, which provided legalization for eligible undocumented immigrants. Applicants for citizenship had a median household income of \$20,000 and an average household size of 4.9 persons, meaning they lived below or very close to the poverty level. On average, applicants had 4.9 years of formal schooling. Fewer than 20 percent claimed to speak, read, and write English well, while more than 60 percent reported speaking, reading, and writing English poorly. Although the average length of residence in the United States was 25 years, the majority of the immigrants lived in ethnic enclaves with few opportunities to learn English.

It is important, especially for funders and program staff, to note how these rural residents with limited English learned about the importance of citizenship and the availability of naturalization assistance through the project. Evaluators surveyed beneficiaries and discovered that 43 percent learned of the service through a relative, friend, or neighbor, followed by 27 percent from a church, and 14 percent from a radio or TV announcement. Although all of the outreach messages originated from funded project staff, only 7 percent or fewer of beneficiaries heard of the services directly from staff, or through outreach flyers, newspaper articles, or community meetings.

Evaluators also asked applicants why they applied for naturalization. A sizeable number, 47 percent, stated they wanted to preserve their eligibility for benefits, while 25 percent listed the ability to bring in family members. Another 25 percent cited the desire to protect their rights. These responses tellingly reflect the political preoccupations of the time. California’s Proposition 187 and Congress’s welfare reform laws had passed, reducing noncitizen eligibility for public benefits. Also, outreach workers’ expressing concern for the immigrant population’s basic needs may have influenced these reactions. As a comparison, in Illinois’s New Americans Initiative, which

is discussed later in the chapter, immigrants in one survey cited access to better jobs and the right to vote and have equal rights, as their main reasons for wanting citizenship: Only 10 percent were motivated by the need for public benefits.

The CVP project attempted to provide a one-stop center where application assistance and language training could be offered. However, ESL and citizenship instruction were regularly available in only two counties—Fresno and Tulare. Both the funder and evaluator expressed serious concern that the allotted funding was insufficient to meet the language training needs across all 17 counties. Volunteers, some of whom were inexperienced teenagers and young adults, delivered much of the instruction. Although volunteer services are often desirable for cost-effectiveness, the project's evaluators noted that 15 percent of students attending ESL and citizenship classes expressed dissatisfaction with the instructor's limited knowledge of the subject material and lack of skill in delivering the curriculum.

Students surveyed ranked the needed improvements in instruction, requesting more: 1) emphasis on speaking English in class, 2) attention to the 96 naturalization questions, 3) activities promoting reading and writing English, and 4) information on civic issues. These recommendations are notable in that they reflect the desire of poor immigrants with low literacy rates to improve their English skills and their preference for instruction geared toward adults and designed to achieve a specific skill or for a specific purpose.

Not every applicant for naturalization could attend ESL and citizenship classes, especially given the lack of available opportunities. Like the majority of naturalization applicants, many in this project were self-directed in learning English, U.S. history, and civics. Applicants not attending class were surveyed on their chosen methods of preparing for the naturalization test. Eighty-three percent of respondents studied a pamphlet or booklet on the 96 naturalization questions. Some 25 percent accessed audiocassette instruction and 19 percent, videocassette instruction. Coaching from friends (17 percent) slightly outnumbered those who practiced with family members (11 percent).

The evaluators criticized most of the adult public schools' naturalization instruction, citing erratic teacher competency and lack of instruction beyond the 96 naturalization test questions. The high dependency on self-instruction, lack of English and citizenship classes, reliance on semi-trained volunteers, and ineffective instruction in the public schools highlight the need for sufficient English and citizenship instruction, invigorated models of naturalization curricula, and greater teacher competency supported by professional training.

RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PROGRAM

- 1 Funders should encourage service delivery organizations to view naturalization services broadly as a form of immigrant integration and to provide educational instruction, immigrant organizing activities, and leadership training. Funding should be ample and sustained enough to cover all these services over the time required to see applicants pass the naturalization test and acquire more life skills.
- 2 Large citizenship projects that cover a wide territory and support multiple service providers require the coordination and training efforts of a specialized organization serving as a fiscal and programmatic reporter, as well as a technical assistance provider.
- 3 Naturalization workshops, particularly roving workshops, should be offered regularly and emphasize accessibility for applicants and high-quality services rather than numbers served.
- 4 Evaluation measures and methods need to be determined prior to project inception to allow for comprehensive reporting of accurate outcomes.
- 5 Particularly for a large consortium project covering a wide territory, a centralized, web-based reporting system with security controls can greatly facilitate data collection for service delivery outcomes an ease evaluation.
- 6 The success rate of naturalization applicants needs to be assessed against national averages and against rates for relevant subgroups with special needs like elders, limited English speakers, rural agricultural workers, refugees and the very poor. Anticipated success rates need to be realistic and take account of the barriers faced by special populations.
- 7 Success rates should include not only persons passing the naturalization test on the first try, but those who pass on the second try and those who reapply and pass. A case management system needs to be used to reduce applicant denials and dropout rates for those who fail after one or more attempts.
- 8 Survey data collection on the effectiveness of outreach, reasons for applying for naturalization, and client satisfaction with services should become the norm for any citizenship project. Outreach workers should be trained on the science of surveys. A volunteer-driven program should survey volunteers for their input and provide ample recognition for their services.
- 9 Funding should favor charitable organizations that provide one-stop services for naturalization application assistance, English language and civics instruction for the citizenship test, pre-interview practice sessions, BIA-accredited legal representation, and post-citizenship integration assistance.

- 10** Funded English and civics education programs for naturalization need to be led by teachers trained in adult education, supported by pedagogical and legal immigration assistance providers. Teachers should have access to curricula that reflect adult learner styles and go beyond the 96 citizenship test questions to the deeper meaning of being an American and an American citizen.

Office of Refugee Resettlement – Refugee Naturalization Projects

Although welfare reform legislation in 1996 caused hardship for many vulnerable newcomers, it particularly impacted refugees. Congress restricted Supplemental Security Income (SSI) payments to refugees in 1996 by limiting eligibility to five years, which it then extended to a seven-year limit in 1997. The limit could not be exceeded, even if refugees were elderly or became disabled, unless they became U.S. citizens or earned 40 quarters of work hours, roughly the equivalent of a 10-year work history. These restrictions placed a very vulnerable immigrant population at high risk for homelessness and deteriorating health.

Most refugees arrive in the United States with few family members or friends, limited possessions, limited English language skills, and scant knowledge of American life. Sponsoring resettlement agencies encourage and support them to achieve self-sufficiency as soon as possible. However, some refugees have obvious impediments to employment, self-sufficiency, and functional English language ability, including the elderly, the disabled, and single parents who may be widowed because of violent persecution in their native country and have multiple children under school age. Some refugees without these barriers may be employable but require special services to cope with severe emotional and physical trauma resulting from past persecution in their home country, the dangers of flight, or abuse in their country of first asylum.

In 1997, as a response to the welfare reform crisis for refugees, the Department of Health and Human Services' Office of Refugee Resettlement (ORR) expanded the definition of funded social services to include naturalization assistance. In addition, ORR awarded grants to community-based organizations serving refugees with legal and English language naturalization assistance. It instructed these programs to prioritize services for elderly, disabled, and low-income refugees with five years or less of residency in the United States. State government refugee offices, using ORR funds and their own state funding, also released Requests for Proposals to serve refugees at risk of losing public benefits. A collection of national, state, regional, and local immigrant service organizations acquired a combination of federal and state funding.

ORR's support of naturalization services is the only example of federal funding for citizenship purposes other than the INS's Naturalization Pilot Project in Southern California. Its support is noteworthy because it focused on a smaller, select immigrant population with special needs and provided funding not only for direct services but also for technical assistance to service providers. ORR's funding is also noteworthy in that, unlike INS's one-year pilot project, ORR responded quickly to authorize and expand naturalization services and improve their effectiveness by providing multiyear, multilayered funding that vertically integrated national technical support and local intervention.

In 1997 CLINIC proposed an original initiative to ORR called the African and Middle Eastern Refugee Naturalization Project. As a result of feedback from Catholic-based refugee resettlement agencies, the largest network of refugee resettlement services, CLINIC had learned that African and Middle Eastern refugees were far less connected than other ethnic groups to social and legal service agencies that had staff with native-language skills and expertise in naturalization. CLINIC proposed to target refugees from Afghanistan, Ethiopia, Eritrea, Iraq, Iran, Somalia, and Sudan in five cities through the direct legal services of its member agencies in Arlington, Va.; Dallas, Tex.; Detroit, Mich; San Diego, Calif; and Washington, D.C. Funding to CLINIC and the five agencies totaled \$245,100 for the first year. For the second and third years, ORR gave CLINIC permission to expand the project to four more cities—Seattle, Wash.; Los Angeles, Calif.; Phoenix, Ariz.; and Houston, Tex., at a total of \$350,100 per year.

As noted earlier, other funding sources also provided monies to reach immigrants and refugees at risk of losing benefits. Concurrent with CLINIC's funding, Catholic Charities in Dallas, Los Angeles, San Diego, and Seattle received state or municipal funding for naturalization services. Seattle reimbursed the Catholic program \$200 for every N-600 application filed for children deriving naturalization through a parent. These sources of funding combined with ORR funding through CLINIC produced a vigorous naturalization project with striking results.

The objectives of the project were to: 1) train culturally and linguistically appropriate staff in naturalization and basic immigration law, 2) obtain BIA-accreditation for staff, 3) translate naturalization materials for the first time in dominant African and Middle Eastern languages, 4) conduct extensive outreach where the target populations resided, worked, played, studied, and worshipped, 5) screen applicants for eligibility, 6) complete naturalization applications, 7) provide or make referrals for English language training, and 8) conduct naturalization test preparation courses. These objectives were similar to the INS Pilot

Project and other charitable immigration program efforts but differed in their specialized focus and approach to this underserved, hard-to-reach refugee population.

Special efforts were made to adequately translate materials into Arabic, Amharic, Eritrean, Farsi, Pashtu, and Somali. Outreach staff made contacts with the target population at mosques, churches, ethnic markets, community centers, ESL classes, apartment complexes, taxi companies, and convenience stores. As the majority of the target populations were Muslim, holiday celebrations for Muslims and mosques where people gathered for prayer or to socialize were productive places for outreach. Early in the project, it was evident that refugee communities, and Africans and Middle Easterners in particular, were uninformed or confused about citizenship. Some communities were initially suspicious of the help offered. However, when the motives for helping became clear and citizenship status was achieved, they expressed deep appreciation for the legal competency, linguistic abilities, and persistence shown.

During the three-year project, the nine Catholic immigration programs filed 2,720 naturalization applications. The highest to lowest ranking of applications filed by nationality was: Iraqi, Afghani, Somali, Ethiopian, Iranian, Sudanese, and Eritrean.

Concurrent with ORR's funding of the African and Middle Eastern Refugee Naturalization Project was its funding of the Technical Assistance to Elderly Refugees Project. ORR recognized that voluntary refugee resettlement programs and county-based Area Agencies on Aging required technical assistance to maximize the partnerships ORR had funded to serve elderly refugee integration and naturalization. With \$207,000 for the first year and \$282,000 for the second and third years, CLINIC conducted the technical assistance project. It contracted with the American Society on Aging in San Francisco and the Little Havana Activities and Nutrition Center in Miami, specialists in aging services to minorities and the foreign-born. The goal was to establish programmatic linkages between resettlement and aging agencies and improve both groups' technical knowledge of naturalization.

Together, the three technical assistance organizations: 1) conducted 45 site visits for local training, 2) provided two regional trainings, 3) held ten conference-call trainings, 4) made presentations at 12 national and regional conferences, 5) advised INS on the revision of the Application for Naturalization form, 6) advised INS on the revision of the N-648 disability waiver form, and 7) created a handbook called, *Best Practices for Serving Elderly Refugees*. This project highlights the importance of national technical assistance for community organizations eager to serve immigrants in the naturalization process but

lacking the level of expertise to produce results-based programs, use public funds effectively, and protect immigrants from applying when ineligibilities are present.

As a result of the two ORR projects, CLINIC produced two important publications. Language instructors for elderly learners were the chief audience for *Citizenship for Refugee Elders: Issues and Options in Test Preparation*. Over 500 copies have been distributed, and it remains an important tool in assessing how elders best learn a second language and unfamiliar American history and government content.

The second book, *Citizenship for Us: A Handbook on Naturalization and Citizenship*, was written for immigrants with limited English ability, community service providers assisting in the naturalization process, paralegals, and English and citizenship instructors. The book's ten chapters contain 342 pages spanning the naturalization application process and pay particular attention to the importance of legal representation, advocacy, and an informed applicant. Eighty pages, which are dedicated to preparing for the naturalization test, offer history and civics content, practice questions in multiple formats, and photographs to aid visual retention of important information. The book is in its fourth edition and nearly 1,500 copies have been distributed.

From 2000 to 2003 ORR's earlier program for African and Middle Eastern refugees was expanded to serve all refugees and Cuban and Haitian entrants. Activities provided by CLINIC and ten immigration program member agencies included assistance with naturalization applications and American history and government brush-up classes before the INS interview. In addition, refugee clients received assistance filing applications for Lawful Permanent Resident status, or green cards, a precursor status required for naturalization.

This project, which ORR funded in the amount of \$420,000, helped 5,385 refugees to file naturalization applications and over 7,500 refugees to file adjustment of status applications. Disabled refugees were assisted by working with doctors to complete the disability waiver application for exemption from the English, history, and civics tests. Newly arrived refugees who were separated from spouses and minor children were assisted in completing petitions for family reunification. This project provided more comprehensive immigration services to refugees by assisting them in maintaining their family unity while taking steps through the naturalization process for family security in the United States.

Under this project, the BIA accredited more caseworkers to represent clients in the naturalization application process and interview. This in turn expanded the availability of professional immigration counseling and representation in refugee languages.

Finally, ORR funding, combined with private funding, allowed CLINIC to sponsor an Immigrant and Refugee Citizenship and Empowerment Conference. Both naturalization experts and immigrant community organizers attended the two-day event. People from these two distinct yet overlapping disciplines trained each other on how to help immigrants and refugees seek citizenship status and how to promote civic engagement activities that positively impact immigrant and low-income communities. This cross-training model continues to be used and is vital to protect newcomers from being marginalized because of their race, ethnicity, nationality, religion, immigration status, or income level.

RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PROGRAM

- 1 ORR should emphasize to Congress that refugees seek citizenship at a rate three times higher than immigrants and benefit greatly from citizenship, rather than refugee, status.
- 2 ORR needs to request more funding from Congress for discretionary programs that support legal immigration assistance to refugees seeking family unity, adjustment of status, and citizenship. In turn, ORR should seek proposals for creative citizenship services.
- 3 ORR funding for citizenship services needs to support charitable legal immigration programs recognized by the BIA. Funding should be primarily directed to charitable programs that are experienced in direct legal immigration services and have access to training and technical assistance through membership in a national support organization. ORR's current practice of using state refugee offices as fiscal and reporting agents for federal funds reduces the money available for charitable programs, because of high state administrative costs, with no benefit of built-in training and technical support. This funding structure splits national and local program capacity and fosters dependence on a second layer of government oversight.
- 4 ORR funding needs to expand to include vertically integrated, in-house citizenship programs that provide outreach, prescreening, application assistance, level 1-4 English training, citizenship classes, pre-interview "brush-up" classes, and post-citizenship civic engagement opportunities. Added to these client-focused services is the capacity of local and national charitable organizations to work with USCIS's national and district offices and the Office of Citizenship (OoC) to ensure a strong private-public partnership.
- 5 ORR should fund technical assistance for local citizenship programs by an experienced immigration legal service provider that knows the full spectrum of refugee and naturalization issues.
- 6 ORR should use conference and consultation opportunities to conduct legal immigration training for resettlement and state government staff, focusing on immigration services that promote family unity, integration, and citizenship. Although it regularly offered such training in the late 1990's, it has stopped in recent years.
- 7 ORR and OoC directors, or appointed designees, should form a working group to identify ways to maximize their missions towards citizenship for refugees and ensure national coverage without overlooking the special needs of refugees resettled in nontraditional, immigrant-impacted communities. Joint ventures could include dissemination of citizenship materials, translation of materials into refugee-based languages, joint symposiums and training, and joint or coordinated funding.

State of Florida – Refugee Naturalization Project

In 2000 the Florida Department of Children and Families' Office of Refugee Services released a Request for Proposals to provide naturalization services to refugees and Cuban and Haitian entrants. Funds for these services were originally provided by the federal Office of Refugee Resettlement and redesignated as state funds for distribution to nonprofit organizations. Two bidders, including CLINIC, were awarded contracts, which spanned 18 months, from April 1, 2001 to September 30, 2002. When the second bidder's contract was revoked in the first year, its funding and caseload were added to CLINIC's contract.

CLINIC's project is notable for its statewide coverage of refugee communities and inclusion of two networks—six Catholic legal immigration programs and two Lutheran social services programs. These agencies included Catholic Charities of Miami, West Palm Beach, Fort Myers, Saint Petersburg, Orlando, and Pensacola and Lutheran Social Services of Northeast Florida in Jacksonville and (under sub-subcontract to Catholic Charities of Saint Petersburg) Lutheran Family Services of Tampa. Each agency was selected for its BIA-recognition status, staff of attorneys or BIA-accredited representatives, experience with naturalization legal services, and strong connection to refugee communities as a federally and state-funded refugee resettlement program.

The Florida project is also noteworthy because its requirements differed significantly from other federal and state naturalization proposal requests. In addition to statewide coverage, the requirements included: prioritiza-

tion of three target populations according to their risk of losing public benefits without naturalization, fixed price legal and nonlegal services, English language and civics instruction, projected numerical goals by service and agency, monthly reporting of numerical achievements against projected goals, numerical reporting using a website-linked Oracle database, monthly reimbursement, and flexibility to change numerical goals and shift monies among agencies, based on the level of demand for services. In addition, the potential for a second contract was announced, dependent on available funds and meeting the first contract's numerical goals.

CLINIC and immigration directors from the eight participating agencies convened in advance of the proposal to estimate actual costs, determining a fixed reimbursement price for each listed service. The following reimbursement rates were proposed and accepted by the state: intake and assessment—\$180, Lawful Permanent Resident application (I-485)—\$360, Application for Naturalization (N-400)—\$360, Application for Naturalization for an elderly refugee (also N-400)—\$450, disability waiver (N-648)—\$450, English literacy instruction per enrollment—\$60, English conversation instruction per enrollment—\$60, naturalization test preparation per enrollment—\$65, and interpreter services—\$65. Participating agencies received a \$60 bonus for documenting adjustment of status and naturalizations granted. No fees were taken for state-funded services. CLINIC's services were contracted for cost reimbursement as opposed to fixed price since it did not deliver direct services but rather fiscal and programmatic oversight, such as training, administrative support, and advocacy with the INS central and district offices.

The project proved enormously successful. Target goals were surpassed each quarter by most agencies, necessitating the transfer of service units and budgeted dollars between agencies since the state was unable to add more funds to the first year's contract. Before the end of the 18-month contract, all eight programs had met their numerical goals but were forced to scale down services while awaiting the renewal of the second contract and a replenishment of funds. The first contract brought in over \$3,200,000 in reimbursements from the state for fixed-price services.

The state asked CLINIC to submit a 24-month, noncompetitive extension proposal for the same services in the same communities based on the success of the first 18 months and the continued need for naturalization services for at-risk refugees. It added one additional service, assistance with fee waver applications, for \$100. Taking into consideration past performance and numbers of refugees in each community, including refugees listed as potentially losing SSI and Medicaid, CLINIC proposed a more ambitious project for fixed-priced services, totaling \$7,750,639. CLINIC's member agency in Pensacola chose not to partic-

ipate. Funding was insufficient for Catholic Charities of Saint Petersburg to continue subcontracting with Lutheran Family Services of Tampa, although the demand for services remained sufficiently high. At the behest of the state to expand literacy services in Miami, Catholic Charities of Miami subcontracted with the Pierre Toussaint Center to provide English and test preparation instruction to Haitian refugees. The state awarded CLINIC a two-year contract, but for significantly less money than requested—\$4,152,634.

Results of the project in the first 12 months of the two-year contract proved that the listed services were in great demand, particularly legal assistance with applications for Lawful Permanent Resident status and naturalization, and English and test preparation instruction. These services and corresponding fixed priced funds were gradually increased by decreasing other services. Like the first 18-month contract, demand for services exceeded the total projected for each quarter, again producing a funding shortfall for the year. Services were scaled back only temporarily in anticipation of the second 12-month contract.

Regrettably, citing the contract's "convenience clause," Florida's Department of Children and Families' Office of Refugee Services sent CLINIC a letter stating it would not renew the contract for the final 12 months and canceling the project in 30 days, as of September 30, 2003. Refugee Services officials subsequently revealed that the office did not have the funds to renew the project because of the state's severe budget shortfall. State officials would not explain why funding was cut rather than reduced.

The Florida project, which had expanded rapidly over 30 months, folded abruptly following the state's 30-day notification. The project was too large for any single agency to absorb without discretionary funds or other naturalization grants. Legal representatives and teachers were laid off, placing a tremendous strain on participating agencies that had active legal cases and students still in the classroom. Some services were extended where possible but only for a short time. In addition to the loss of anticipated revenue and trained colleagues, the sudden cancellation of funding and services hurt the agencies' reputations with the refugee clients they served, who could not understand how this highly sought after program with noticeable success rates could be de-funded.

During the two funded contracts, between April 1, 2001 and September 30, 2003, CLINIC's participating agencies completed: 7,588 intakes, 4,906 Lawful Permanent Resident applications, 1,097 naturalization applications, 249 elderly naturalization applications, 169 disability waiver applications, 131 fee waiver applications, 8,814 hours of literacy instruction, 3,679 hours of conversational instruction, and 3,408 hours of test preparation instruction. Despite the increased numbers, the passing rate for

applications for Lawful Permanent Resident status and naturalization remained above 90 percent due to the quality of intake, eligibility screening, and supportive services. However, the project's truncated contract period and INS's processing delays for adjustment of status, naturalization interviews, and oath ceremonies meant that only 587 Lawful Permanent Resident and 229 naturalization applications were granted within the project period.

Implications of the Florida Refugee Naturalization Project are significant for a national citizenship program. The project is an example of how states assumed financial and programmatic responsibility for congressional action barring noncitizen refugees from accessing public services after reaching a seven-year limit. It also shows the great demand for citizenship services, a demand that exceeded the expectations of a consortium of eight agencies and could not be fulfilled without supplemental funding, which was nonexistent. The project also demonstrates how demand for services builds momentum with each month as immigrants and refugees take part in the long preparation and educational process and are motivated by the successful outcomes of their peers. The state's project design shows how a full menu of legal and nonlegal services is best combined to support naturalization goals. Its use of benchmarks, fixed-price reimbursement, incentives, and flexible allocation of funds among services and communities helped achieve and document desired results. The Oracle database allowed the state to use its restricted website link to analyze service unit data by client for all its subcontractors statewide, offering a wealth of statistical results for future program priorities and funding.

RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PROGRAM

- 1 In order to ensure that smaller, less urban immigrant communities have equal access to services, funding for naturalization services should be statewide, rather than focused on a few urban areas.
- 2 Funders should encourage collaboration and partnerships among different service networks to maximize geographic coverage.
- 3 Large-scale naturalization projects should combine a full menu of both legal and nonlegal services to support their goals.
- 4 Large-scale naturalization projects should be designed with built-in flexibility to change numerical goals and shift monies between partner agencies, based on the demand for services.
- 5 Contractors funding naturalization services need to plan carefully and ensure sufficient funds to avoid disruptions in service if service goals are reached before the end of a contract year.

- 6 Funders should give grantees sufficient notice of funding level changes to avoid an abrupt loss of anticipated revenue, which forces layoffs of trained staff and sudden cancellation of services to clients.
- 7 Naturalization project funders should utilize a database to collect individual client data and analyze services by all their grantees, as the database will offer a wealth of statistical results for future program and funding priorities.

State of Illinois – New Americans Initiative

In 2003 immigrant advocates prompted the Illinois General Assembly to form the Joint Legislative Taskforce on Immigrants and Refugees to identify barriers to immigrant integration and other challenges faced by the state's foreign-born population. A hearing on civic engagement identified the lack of current, accurate information about naturalization and services supporting naturalization as the most significant barrier to immigrant civic participation. On April 21, 2004, Gov. Rod Blagojevich announced his support for the New Americans Initiative (NAI), with \$3 million of funding in his proposed budget. Funding was directed to the Illinois Department of Human Services (IDHS) and granted to the Illinois Coalition for Immigrant and Refugee Rights (ICIRR).

ICIRR, a major proponent of the governor's initiative, undertook a feasibility plan for delivery of public information and direct services. It collected data on the number of Lawful Permanent Residents (LPRs) statewide who were eligible to naturalize, their place of birth, year of entry, and English proficiency. It also created maps reflecting the concentration and dispersion of LPRs in Chicago neighborhoods, suburbs, and other state locations.

Recent Census data showed that 58.34 percent (197,732) of the state's LPR population were from Latin America, 20.04 percent (67,930) from Europe, 19.76 percent (66,985) from Asia, and 1.86 percent (6,300) from Africa. Immigrants with the highest rate of naturalization were from Europe (51.5 percent) and Asia (48.70 percent), while Africans (38.6 percent) had a lower rate. The lowest rate of naturalization—27.6 percent—was for immigrants from Latin America, a majority of whom were from Mexico.

IDHS and ICIRR prepared a Request for Proposals for subgrantees to provide direct services, and ICIRR received 35 proposals requesting \$6,489,969, compared to the total of \$2,350,000 designated for direct services. Recommendations for funding priorities were made through a consultative process with government officials and members of a citizen advisory panel comprised of nonprofit representatives not seeking funding from the Initiative. The first cut of selected proposals was based on

merit, the second on geographic priorities, and the third on the size of the population to be served among the ethnic groups eligible for naturalization. For the first year of funding, from July 2004 to June 2005, NAI supported 11 collaborations involving 51 organizations. Each organization within a collaborative provided one or more of the following specialized services: outreach, civics education, or legal assistance and representation for naturalization applicants. Twelve organizations were funded for outreach only.

A separate Request for Proposals was also launched to secure outreach assistance. Scofield Communications won the competitive bid to provide ICIRR and the NAI collaborations with strategic communication planning, message development, television and radio production, outreach print materials, event planning, and oversight of survey research on immigrant opinions of the naturalization process and citizenship. Shortly before large group processing application workshops were held throughout Chicago, two 60-second television spots and a 30-second radio spot by Scofield were aired. Also expanding outreach was ICIRR's toll free number for people seeking information on eligibility requirements, documents necessary to complete an application, application workshop schedules, and a list of NAI organizations in their neighborhood.

Once selected for funding, organizations sent staff to attend a series of meetings and trainings. At the meetings, staff coordinated the service delivery plan across collaboratives and territories, implemented shared statistical reporting procedures using a web-based database, and collected outreach materials. Training focused on demographic research results, outreach methods guided by target population demographics, naturalization law, the naturalization group application workshop model, and volunteer recruitment and training methods. CLINIC's Midwest field attorney in Chicago played a central role in providing naturalization training to outreach and legal staff.

To support the English language needs of the target population, NAI offered 43 classes in Chicago neighborhoods, suburbs, and other cities across the state. Classes were scheduled for maximum convenience and held in the mornings, afternoons, early evenings, and weekends. Most were offered for one to two hours twice a week in the early evenings and on weekends. At the end of NAI's first year, 445 students had finished citizenship classes, 2,114 students were enrolled, and 548 were on waiting lists lasting a few weeks. Around 150 had dropped out.

The centerpiece of NAI was a cluster of naturalization group application workshops held on the same day, February 26, 2005, and attracting approximately 1,100 people. Over 400 trained volunteers and 100 NAI staff provided logistical and application assistance. Through extensive media coverage, Scofield Communications raised

public awareness about subsequent workshops. Two more "mega" workshops in six locations across the state resulted in 1,478 applications prepared. Each of the three large workshops had a 1:3 volunteer-to-applicant ratio. A series of local workshops and individual appointments added to the first-year total of 2,879 applications completed. At the naturalization interview, 48 applicants were determined to require legal representation because of the complexity of their cases.

Because of the time required for USCIS to schedule interviews, NAI could report only a small number of outcomes on applications filed. By the end of the first year, 241 applicants had been scheduled for interviews, 74 had passed, 67 were scheduled for a swearing-in ceremony, and 35 were sworn in as U.S. citizens. These numbers reflect the need for naturalization programs to be funded over multiple years to assist as many persons as possible but to also track as many outcomes as possible over the time required to complete the naturalization process.

Considerable demographic data was gathered on the immigrants responding to workshops and other outreach efforts. Nationality, education level, English language skills, and income were of special interest, as they are strong variables influencing the rate of naturalization. Of the immigrants reached, 46 percent were Mexican, 14 percent were South Korean, and 9 percent were Chinese from the People's Republic of China. Poles, Indians, Vietnamese, Pakistanis, Guatemalans, and Bosnians trailed at 2 percent each.

Data on education attained either in the native country or the United States showed that 23 percent had fewer than six years of formal education, 51 percent had completed between seven and 12 years, 10 percent had completed a General Equivalency Degree, and 16 percent had acquired a two-year college degree or higher.

When asked to rate their skills in speaking, reading, and writing English, 16 percent of respondents reported knowing English "Not at All," 42 percent said, "Not Very Well," and another 42 percent answered, "Well."

Most of the immigrants contacted held low-wage jobs. Half of the people directly assisted in the project earned low wages: 23 percent earned less than \$801 per month and 26 percent between \$801 and \$1,301. Middle wage earners were 35 percent of the total, while only 16 percent of those assisted earned a monthly income of \$2,701 or higher. This data reflects the importance of publicly funded naturalization programs reaching low-income immigrants otherwise underserved or uninitiated in the naturalization process, to avoid perpetuating lower naturalization rates for the poor.

NAI staff also reported the same barriers to citizenship as cited in nationwide studies. The top five barriers were: 1) lack of English skills, 2) unfamiliarity with naturalization requirements and the benefits of citizenship, 3) fear of failing the naturalization exam, 4) fear of government immigration officers, and 5) the high cost of the naturalization application fee.

NAI conducted further research on why immigrants desired U.S. citizenship. The most common reason was to access better jobs, followed by the right to vote and have equal rights with other citizens. Only 10 percent listed the need for public benefits as a main motivator for citizenship. Reflecting the need for naturalization assistance, 80 percent felt that applying for citizenship was either very or somewhat difficult.

RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PROGRAM

- 1 Private funders need to support advocacy for national and state citizenship projects in order to get them widely disseminated and understood by legislators and the public, and to create a coalition to move the initiatives through Congress or state legislatures.
- 2 In recognition that the need for naturalization information and services is the most significant barrier to immigrant civic participation, funders should support not only immigrant civic engagement but also naturalization outreach and application assistance.
- 3 In the absence of comprehensive service providers, funding for a national citizenship program should support a mix of organizations with complementary strengths.
- 4 Funding priority for a national citizenship program should be given to BIA-accredited agencies and those seeking accreditation, with benchmarks to ensure accreditation status is accomplished.
- 5 Capacity-building grants should be time-limited and have benchmarks to increase outreach, legal service, education, and training capacity.
- 6 In planning for services, large-scale naturalization projects should utilize data on the number of Lawful Permanent Residents eligible for naturalization, their characteristics, and their geographic concentration and dispersion.
- 7 To ensure a strong start, the pre-implementation phase of a national citizenship program requires: clear goals, objectives, roles, and responsibilities; a planning meeting; a community meeting to understand general expectations for the project; an advisory council to create the Request for Proposals, which should be broadly disseminated; sufficient turnaround time, perhaps 12 weeks, to submit a proposal; database design, construction, and testing; and market testing of messaging for print and broadcast media, posters, and slogans.
- 8 Messaging, outreach, and services for a large-scale naturalization initiative need to take into consideration the large numbers of Latino Lawful Permanent Residents, their various ethnic backgrounds, and their low rate of naturalization.
- 9 Service providers in a national citizenship program should work in partnership and be accountable to one another.
- 10 A national citizenship program should require citizenship group application workshops but allow local flexibility on the size and number of workshops.
- 11 The database for a national citizenship program should contain meaningful information that contributes to the naturalization process, maintains confidentiality, and ensures that people do not fall through cracks. The database should be structured to block access and data entry by nonauthorized users.
- 12 In the first year, a national citizenship program should be evaluated on its outreach and contacts rather than the number of applications filed.

U.S. Committee for Refugees and Immigrants – Citizenship AmeriCorps Project

The U.S. Committee for Refugees and Immigrants (USCRI) is a national voluntary organization that addresses the policy and service requirements of people worldwide in forced or voluntary migration. It is affiliated with a network of local agencies serving the resettlement needs of refugees with the goal of assisting them to become self-sufficient and full participants in community life.

USCRI recognizes citizenship as a significant achievement in immigrant integration. Challenges for immigrants in the naturalization process include learning a new language, preparing for the test, paying high application fees, and navigating the federal bureaucracy. Another challenge is transforming citizenship into civic engagement.

In the fall of 2004 USCRI launched the Citizenship AmeriCorps Project, which emphasizes immigrant integration as a two-way process between foreign and native-born community members. The project aimed to place AmeriCorps members in selected communities around the country, where they would promote community involvement with immigrants in the naturalization process. (AmeriCorps is a network of national service programs under the Corporation for National and Community Service that engages more than 50,000 Americans each year in intensive volunteer service to meet critical needs in education, public safety, health, and the environment.)

During the first year of the program, the 32 AmeriCorps paid volunteers, known as members, ranged in age from 19 to 71, but the majority were young, recent college graduates. Their race and ethnicity reflected the diversity of the U.S. immigrant population. Approximately half were U.S. citizens and half were Lawful Permanent Residents.

Members were recruited to work at 12 community service organizations that serve the social service and integration needs of immigrants and refugees. Each worked a minimum of 1,700 hours during the year and received a stipend of \$10,600, basic health insurance, and an educational award of \$4,275 upon completion of service. Each service organization contributed to the program with a \$3,000 match per member. All members were assigned to a supervisor, some of whom were attorneys or BIA-accredited representatives.

As part of the ongoing citizenship project, members are active on an individual level and communitywide. They promote immigrant civic engagement through the naturalization process by: conducting public outreach campaigns for greater awareness of citizenship responsibilities and rights, increasing access to English language and civics classes for higher pass rates on the citizenship test, recruiting volunteers as tutors to help immigrants overcome individual barriers to studying in a foreign language, and identifying creative activities to infuse the naturalization process with meaning about U.S. values to promote immigrant self-identification as Americans.

AmeriCorps members involved in the project manage citizenship study centers, which offer one-on-one tutoring by community volunteers. They also assist with the preparation of citizenship applications, mock interviews, and disability and fee waivers. They work closely with community outreach officers from the USCIS Office of Citizenship in order to enhance their knowledge and obtain program materials. Special events showcase their work in the immigrant community and encourage immigrants to use their services, which are offered without fees. Members take clients to community and neighborhood meetings to observe how Americans resolve community concerns. At several sites, members appear on ethnic radio programs or write newspaper articles in the language of the immigrant community about the importance of citizenship and how to accomplish that goal.

Most citizenship study centers have placed a special emphasis on the elderly, who have often given up hope of citizenship and, at the same time, are in danger of losing benefits on which they depend. In addition, members help immigrants become empowered as they learn their rights and how their rights will increase with citizenship.

In the spirit of building community support, members recruited 251 volunteers who worked 4,867 hours, primarily in tutoring, in the citizenship study centers. It has been fairly easy to recruit and maintain volunteer tutors since they work one-on-one with an applicant from the time the applicant comes in until he or she completes the naturalization ceremony. Not all volunteers feel comfortable being ESL teachers, but tutoring can be far easier and sometimes more rewarding on a personal basis since tutors are able to participate (and celebrate) at each step of the way.

In the project's first year, members assisted 2,725 people. Of this number, 740 became U.S. citizens, while 1,090 are expected to become citizens in 2006. The number of people assisted is greater than originally projected but the number achieving citizenship status is less because of government delays in processing applications. A large majority of members ending their year of service reported having a very positive experience. USCRI is now sharing the lessons learned and best practices of the first year with new AmeriCorps members. Seven of the original members have chosen to stay for an additional year.

The President's 2007 budget proposed the elimination or significant reduction of 141 government programs, including the \$48.5 million for AmeriCorps. However, the Citizenship AmeriCorps Program is expected to survive.

RECOMMENDATIONS FOR A NATIONAL CITIZENSHIP PROGRAM

- 1 Volunteers should be an important component of a communitywide citizenship project, especially when the project has many time-consuming activities that are difficult to fulfill by overworked, professional staff.
- 2 In order for volunteers to work best, activities should be well defined, time-limited, and have specific achievable and rewarding outcomes.
- 3 Volunteer programs need to acknowledge the limitations of each volunteer and not impose duties that greatly exceed skill or comfort level.
- 4 Volunteer-supported citizenship programs should have strong supervision and technical support, particularly in the specialized areas of providing legal immigration information and language instruction.
- 5 Volunteer programs serving the foreign-born in the naturalization process need to emphasize the two-way street of multicultural service learning. Having American-born U.S. citizens work as volunteers in the immigrant community furthers the understanding of both groups. The American-born have a richer appreciation of immigrants and all they have endured, while immigrants learn about the larger community and how easy it can be to communicate and become friendly with someone of an entirely different background.

- 6 Citizenship programs should provide one-on-one opportunities for native and foreign-born persons to share the experience leading to and beyond the naturalization oath ceremony, as this will make the programs richer and far more enduring.
- 7 Citizenship programs with volunteers who are not comfortable being ESL teachers should encourage them to tutor an applicant one-on-one, since the close relationship with the applicant can be very rewarding for the volunteer and result in better volunteer retention.

The John S. and James L. Knight Foundation – American Dream Fund

The American Dream Fund began in the fall of 2005 as a local immigrant integration endeavor of the John S. and James L. Knight Foundation. Managed by Public Interest Projects, the fund's total of \$6 million supports immigrants and refugees in improving their living conditions and communities. Its multi-year grants range from \$10,000 to \$25,000 per year for general and civic engagement activities by 29 immigrant-focused organizations in 14 communities where the foundation has long-standing commitments. The communities include: Biloxi, Miss.; Boulder, Colo.; Charlotte, N.C.; Columbia, S.C.; Detroit, Mich; Fort Wayne, Ind.; Lexington, Ky.; Long Beach, Calif., Miami-Dade/Broward, Fla.; Palm Beach, Fla.; Philadelphia, Penn.; San Jose, Calif.; St. Paul, Minn.; and Wichita, Kans.

Each grantee is engaged in a combination of citizenship-related services. Approved activity categories include: assistance with the naturalization process, preparing immigrants for citizenship, organizing immigrants to address systemic barriers to integration, organizing nonpartisan voter education and get-out-the-vote campaigns, developing adult and youth leadership opportunities, and building community relationships across race, ethnicity, and immigration status. The fund also encourages local participating organizations to work with national immigrant advocacy networks on shared advocacy campaigns, planning, communication strategies, and events.

The fund will release results of the first year's outcomes at the end of 2006.

Office of Refugee Resettlement – Technical Assistance Request for Proposals to Promote Citizenship and Civic Participation

On April 12, 2006, the Office of Refugee Resettlement (ORR) issued seven Requests for Proposals for national technical assistance. One priority area identifies technical assistance on citizenship and civic participation for state-administered refugee service providers, ethnic-based mutual assistance associations, voluntary agencies, and other refugee service providers. The purpose is to help refugee service providers: 1) increase services helping refugees become U.S. citizens, 2) advocate on behalf of refugees with federal and state agencies, 3) access national resources on naturalization and citizenship issues, and 4) promote civic participation among refugee communities.

Over the past decade ORR has funded an array of technical assistance providers in English language training, refugee outreach services, vocational training, job placement, and small business development. This federal technical assistance grant is unique for combining naturalization and civic participation activities, including administrative advocacy.

The announcement offers a budget of up to \$200,000 for one year with the potential for renewal, for a total project period of three years. The award was made to Catholic Legal Immigration Network, Inc. in September 2006.

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- 1 Department of Homeland Security. "Table 20, Petitions for Naturalizations Filed, Persons Naturalized, and Petitions for Naturalizations Denied: Fiscal Years 1907 to 2005" in *Yearbook of Immigration Statistics* (1995).
 - 2 Wasem, R.E. Congressional Research Service Report for Congress No. 98-190. "Naturalization Trends, Issues, and Legislation" (June 24, 1998).
 - 3 National Immigration Law Center. "Alien Eligibility for Public Benefits" in *1998-99 Annual Handbook* (Los Angeles, CA: NILC, 1998).
 - 4 Hing, B.O. "The Emma Lazarus Effect: A Case Study in Philanthropic Revitalization of the Immigrant Rights Community," *Georgetown Immigration Law Journal* (Fall 2000).
 - 5 Ibid.

SECTORS OF SOCIETY SUPPORTING A NATIONAL CITIZENSHIP PROGRAM

This chapter highlights the institutions that will be essential to a national citizenship program, emphasizing the roles of federal, state, and local government agencies and private organizations. All of these stakeholders have an important role in promoting immigrant integration, citizenship, and civic participation. This chapter describes their relationship to the immigrant population, their work in this area, and recommendations for their role in a national citizenship program.

The Executive Office of the President of the United States

The President plays a dominant role in determining the extent to which the United States continues to be a nation of immigrants. Through the office's executive power, the President formulates domestic policy, establishes orders, introduces legislation, and requests funding to ensure the nation has the immigrant population it needs to grow and prosper. The President's authority over immigration laws broadly shapes which immigrant groups permanently reside in the country and which family members are reunified. Administration-sponsored changes in funding for federal means-tested benefits also affect the quality of life for immigrants who live near or below the poverty level. Other laws and regulations endorsed by the President direct how immigrants gain access to employment, courts, and government services, particularly immigration status through the U.S. Citizenship and Immigration Services (USCIS).

Primarily, it is the President who can use the influence of office to implement a national citizenship plan—one that promotes the knowledge and appreciation of citizenship status; ensures that government immigration and naturalization services are accessible, affordable, and efficient; maintains sufficient funding to the private sector to guide immigrants through the complex naturalization process; and invites immigrants to take personal responsibility as full members of the U.S. democracy.

Prominent efforts by the White House in recent years to promote English language training, improve government services, and encourage citizenship point to what is needed to implement a national citizenship plan and develop an immigrant integration policy. In 1992 the Clinton administration, through the Immigration and Naturalization Services (INS), launched an initiative

called Citizenship USA (CUSA) to expand public outreach on citizenship eligibility and benefits and streamline the naturalization process in the face of ever-increasing backlogs and delays. In 2000 the Clinton administration also supported funding in the amount of \$6.3 million for the Department of Education to create teaching English literacy and civics education demonstration projects designed to help limited English proficient adults improve their English language skills and gain an understanding of the U.S. Constitution, laws, and system of government. Funding for this program has expanded over the years, and was \$70 million in 2006.

In 2002 President George W. Bush signed into law the Homeland Security Act, which eliminated the INS, separating its functions into several entities within a newly constituted Department of Homeland Security (DHS). USCIS administers immigration status services, such as the processing of immigration and citizenship applications, while the Office of Citizenship (OoC) has a mandate to promote instruction and training on citizenship rights and responsibilities and to provide immigrants with the tools necessary to successfully integrate into American civic culture. The bill also established a DHS position of citizenship and immigration services ombudsman to assist in identifying systemic problems within the USCIS and assist individuals and employers with specific problems.

On July 3, 2002, President Bush signed the Expedited Naturalization Executive Order, which designated the period on or after September 11, 2001, as a period of military conflict and allowed certain members of the U.S. military who served honorably in active duty during that time frame to apply for naturalization immediately.

These presidential initiatives demonstrate the power of executive action, often with congressional support, to assist immigrants and their path along the naturalization process. Funding for education, English language training, legal and social services, and civics instruction influences

the development and inclusion of immigrants overall. While essential, these actions alone do not ensure that a maximum number of eligible immigrants become U.S. citizens. More can be done towards this end, as outlined in the following recommendations.

RECOMMENDATIONS:

Naturalization and Citizenship Promotion:

- 1 The Administration should lend the prestige of the executive office to promote a national citizenship media campaign that stresses the importance of citizenship, its benefits, and its responsibilities.

Citizenship Day

President Harry Truman established Citizenship Day in 1952. September 17 was chosen because it was the day on which the U.S. Constitution was signed in 1787. Citizenship Day celebrates the privileges, rights, and responsibilities of U.S. citizenship, and honors both native-born and naturalized citizens. It is traditionally commemorated with pageantry and speeches. In recent years, some U.S. Citizenship and Immigration Services (USCIS) offices have held large oath ceremonies on Citizenship Day, and newspapers have featured articles about naturalization and new citizens.

Citizenship Day is a chance to highlight the many benefits that citizenship brings to individuals, families, and communities. With these benefits come certain civic responsibilities. In a speech celebrating the first Citizenship Day, President Truman exhorted all citizens to educate themselves about government, stay informed of the “great problems of the day,” and exercise the right to vote. He said: “The success of free government depends upon the willingness of the citizen to participate in it, to contribute to it, and to sacrifice for it.”

- 2 The Administration should acknowledge the contributions of immigrant laborers, including the poor and low-skilled, in public communications.
- 3 The Administration should prepare a videotaped address by the President for use at naturalization ceremonies. The address should emphasize immigrant contributions to the United States and the importance of their decision to become citizens.
- 4 The Administration should provide cabinet secretaries and other persons in high-level government positions to speak at naturalization ceremonies about immigrant contributions and the importance of becoming a U.S. citizen.

- 5 The Administration should encourage immigrants to prepare for naturalization as early as possible and direct them to various forms of assistance.
- 6 The President’s speeches should encourage native and foreign-born residents to be civically engaged across ethnic lines as a way of expressing their patriotism for the United States.
- 7 The Administration’s support for naturalization and civic engagement should be promoted not as a benefit or threat to one political party but as an opportunity for the advancement of patriotism, loyalty, American values, and civic knowledge among the foreign-born and their children.

Policy Development and Implementation:

- 8 The Administration should appoint a commission to study the ways in which different federal departments contribute to or inhibit immigrant integration and how integration activities can be better promoted and coordinated. The commission should study the U.S. refugee resettlement program as a model for a broader federal integration program.
- 9 At a minimum, the Administration should foster the following four pillars of integration: English language development, naturalization, civics education and activities, and voting.
- 10 The Administration should increase Department of Education funding, through the Workforce Investment Act, for its English as a second language (ESL) and civics education initiative.
- 11 The Administration’s integration policy needs to be developed in consultation with immigration experts and national security experts.
- 12 The President needs to encourage each department in the federal government to develop a coordinated immigrant integration policy befitting a “New American” agenda that can span many years and multiple administrations.

Naturalization and Citizenship Funding:

- 13 The Administration must support ample funding for the OoC to: fulfill its mandate, properly staff its activities, create and disseminate free materials, partner with charitable organizations through multiyear grants, and develop ongoing public education campaigns.
- 14 The Administration should support full funding of the OoC and eliminate the current policy of funding it exclusively from USCIS’s application fee account. Adequate public funding for OoC’s vital functions should be a shared responsibility between the nation and immigrants.

- 15 The Administration should support an increase in funding for the Department of Education's English literacy and civics education grants program. The curriculum should include a module on naturalization requirements for students wishing to continue the course in preparation for citizenship.
- 16 The Administration should support an increase in funding for the Department of Education's Adult Education and Literacy program to increase the availability of instruction for immigrants who speak limited English and are not yet prepared to pass the naturalization test.
- 17 The Administration's immigrant integration program should support local communities rather than burdening them with onerous requirements.
- 18 The Administration should support more funding to USCIS to reduce processing backlogs to an acceptable level in order to ensure that businesses are supplied with sufficient immigrant labor, immigrant families are reunited, refugees are protected, and naturalization waiting periods in every USCIS district office do not extend beyond six months.
- 19 The Administration should urge Congress to provide USCIS with flexible use of its client fee account so that it can respond quickly to sudden increases in workload. The Administration needs to ensure that each new immigration law has funding to adequately support USCIS applicant-processing responsibilities.
- 20 The Administration should ensure that the Federal Bureau of Investigation has the funding to process security clearances in an expedited manner. This will enhance national security and reduce application processing delays that sometimes extend the normal waiting time of nine months by 12 months or more.
- 21 The Administration should endorse increased funding to the Office of Refugee Resettlement within the Department of Health and Human Services for discretionary programs that promote the integration of refugees through orientation, English classes, civic engagement opportunities, and naturalization application assistance.
- 22 The Administration's budgets should reflect the needs of community colleges, libraries, and nonprofits that educate immigrants in English for life skills, employment training, General Equivalency Degrees, two- and four-year college degrees, civics education, and naturalization.

Coordination of Citizenship Services:

- 23 The President should meet with leaders of both political parties to outline the Administration's broad goals for national citizenship promotion and immigrant integration.
- 24 The Administration should call on members of Congress from both parties to promote citizenship, provide naturalization services to immigrant constituents, and introduce immigrant integration legislation.
- 25 The Administration should direct USCIS and OoC to identify ways community groups can be more involved in naturalization oath ceremonies.
- 26 The Administration should foster partnerships in support of citizenship and immigrant integration between public and private sectors.

The Congress

The U.S. Constitution empowers Congress to regulate the migration and importation of "such persons as any of the states now existing shall think proper to admit" (Article I, Section 9, Cl. 1) and to "establish a uniform Rule of Naturalization." (Article I, Section 8, Cl. 4). These two powers in tandem determine which aliens enter the United States to reside permanently and become U.S. citizens. Specific authority for naturalization eligibility requirements is found in the U.S. Code of Federal Regulations, Title 8, Chapter 12, Subchapter III, Part II. Congress has the implied authority under the power of national sovereignty and foreign policy to exclude and remove aliens, including those petitioning the government for U.S. citizenship through the naturalization process. Aliens admitted into the United States are afforded due process rights to determine their claims to stay in the country and under what status.

The Constitution also empowers Congress, specifically the House of Representatives, to "lay and collect taxes, duties, imposts, and excises, to pay the debts and provide for the common defense and general welfare of the United States..." (Article I, Section 8, Cl.1). As such, Congress legislates the appropriation of public funds to support the federal government's responsibility to regulate immigration and provide benefits to immigrants, including the conferring of citizenship.

In recent years, Congress has given piecemeal attention to immigration issues, particularly naturalization. Investigative hearings were held in 1996 concerning the flawed Citizenship USA initiative of the Immigration and Naturalization Services (INS). The Clinton administration's FY 2000 budget, approved by Congress, included an appropriation of \$124 million to U.S. Citizenship and Immigration Services (USCIS) for reduction of the backlog in processing naturalization applications. In 2000 Congress passed the Child Citizenship Act, making an unmarried,

Lawful Permanent Resident under the age of 18 automatically a citizen when a parent with legal and physical custody becomes a citizen. The Hmong Veterans' Naturalization Act of 2000 provides an exemption from the English language requirement and special consideration for civics testing for certain refugees from Laos who applied for citizenship before a set filing deadline. Also in 2000 Congress passed a waiver of the oath of allegiance for persons with severe physical or developmental disabilities or mental impairments who are unable to understand or communicate an understanding of the oath's meaning. In 2003 Congress passed legislation providing expedited naturalization for certain current or recently discharged members of the U.S. military, as well as posthumous citizenship for those who die in combat and special consideration for their surviving family members seeking immigration benefits. This legislation changed the existing three year military service requirement to a one year requirement, allowing military personnel to apply for naturalization earlier.

In 2002 the Homeland Security Act eliminated the INS and separated enforcement functions from immigrant services. It also separated the processing of immigration and citizenship applications from immigrant instruction, information, and training on citizenship rights. Operating within the Department of Homeland Security (DHS), USCIS grants immigration status, while the Office of Citizenship (OoC) provides educational services.

Congress's most active involvement with immigrant issues in recent years has been its review of laws and procedures through a prism of national security, identifying how immigrants enter, stay, change address, adjust status, and become citizens. Currently, Congress is debating competing immigration bills over how undocumented immigrants may access and keep jobs and under what conditions they may reside temporarily or stay with access to a permanent status, placing them on the path to U.S. citizenship.

It is evident that Congress plays a dominant role in shaping the general welfare of the nation, including the effects of immigration and the experience of immigrants as a growing part of the population. Regrettably, in recent years Congress has tended to view immigration only in terms of national security. In doing so, it is neglecting important legislation that would further integrate current and future immigrants through English language skills, civic knowledge, citizenship, and voting experiences. Each of these can increase immigrant support for our nation's founding principles and democratic process. The fulfillment of a national citizenship plan depends greatly on congressional leadership and will to act in support of these broad purposes.

Members of Congress Hold Naturalization Application Workshops

Rep. Edward Pastor (D-AZ) represents the Fourth District of Arizona including central, south, and western Phoenix and Guadalupe. Naturalization assistance from the congressman's office is an important service for immigrant constituents. In 2005 Pastor's office hosted three naturalization application workshops assisting over 400 people with support from 60 volunteers. The congressman's office works closely with ethnic media outlets and his staff takes calls to register people in advance and prepare any necessary documentation. Public schools work in partnership by conducting outreach to students' parents and providing space needed for hundreds attending the workshops. Businesses sponsor volunteer training by donating space and food. One workshop featured a representative from the state attorney general's office who spoke on predatory businesses and money lending schemes.

Rep. Luis Gutierrez (D-IL), representing the Fourth District in and around Chicago, also sponsors naturalization application workshops. The district's population is 40 percent foreign born. In the past, the congressman has sponsored an average of seven workshops per year. On July 2, 2005, approximately 500 potential applicants attended. Since his office began hosting workshops, the staff has assisted up to 42,000 people to become citizens. Most recently, workshops have been coordinated with Illinois' New Americans Initiative, a statewide naturalization project. Contributors to workshops are: volunteers who help with applications, ethnic media outlets that air free public service announcements, USCIS staff who offer public information at the event, and the state attorney general's office, which gives information on the unauthorized practice of law and other predatory businesses targeting immigrants.

RECOMMENDATIONS:

Appropriations:

- 1 Congress should pass adequate appropriations for immigrant integration policies to ensure that local communities do not face unfunded mandates and bear a disproportionate financial burden for federal immigration initiatives.
- 2 Congress must provide significantly more funding to the OoC so that it can fulfill its mandate. With sufficient staff and budget, the OoC can: conduct national multimedia public education campaigns; create and disseminate free citizenship promotional and educational materials; make grants to charitable organizations for training,

teaching, curriculum development, outreach, and direct application assistance; provide training grants to increase professional competency in all regions of the country; promote greater federal collaboration in improving immigrant knowledge and appreciation for citizenship; encourage public-private partnerships; and host national and regional meetings for researchers, practitioners, government employees, and elected officials to discuss how American values can be better promoted in the immigrant population.

- 3 In order to make citizenship a public funding priority shared by all Americans, Congress must appropriate funding of the OoC and cease the current policy of funding it solely with monies from immigrant application fees, paid to USCIS.
- 4 Congress must eliminate the singular use of immigrant application fees to support USCIS's backlog reduction plan, USCIS litigation costs, military naturalization fee waivers, and the humanitarian work of processing refugees and waiving their application fees to adjust to Lawful Permanent Resident status.
- 5 Congress should support an increase in funding for the Department of Education's English literacy and civics education grants to better instruct immigrants in English and on the fundamentals of the U.S. Constitution, the act of law-making, and the work of federal, state, and local government.
- 6 Congress needs to increase funding for the Department of Education's adult education and literacy programs to increase the availability of accessible, appropriately designed instruction for immigrants who speak limited English and are not yet prepared to pass the naturalization test. Funding should emphasize the promotion of family literacy, civic education, and citizenship.
- 7 Congress must provide more funding to USCIS to reduce backlogs for all citizenship applications to six months or less in every USCIS district in order to keep businesses supplied with sufficient immigrant labor, reunite immigrant families, and permanently protect refugees. It is imperative for Congress and USCIS to support this goal before a national citizenship plan is implemented, in order to ensure that the plan does not overburden a poorly performing bureaucracy.
- 8 Congress should ensure that each new immigration law has sufficient funding to support USCIS's application-processing responsibilities. Application-processing backlogs should not be exacerbated because Congress fails to provide sufficient monies for additional workloads.
- 9 Congress should prioritize funding for the Federal Bureau of Investigation (FBI) to enable it to process USCIS's security clearance requests in a timely manner. Current delays sometimes extend the average wait by an additional year or more.

- 10 Congress should require the FBI and USCIS to coordinate and share immigration security-clearance processing rates and outcomes.
- 11 Congress should expand funding to the Department of Health and Human Services' Office of Refugee Resettlement for its discretionary programs that promote the integration of refugees. These programs support orientation, English classes, civic engagement opportunities, and naturalization application assistance.

Establishing New Authority:

- 12 Congress must authorize USCIS to have flexible use of its fee account revenue to enable it to respond quickly to unexpected increases in immigration applications. When fee revenues from applications expand, its budget should expand. Alternatively, Congress could approve USCIS's budget total at a percentage higher than the anticipated fee revenue, allowing USCIS to spend only what it receives in fees until Congress authorizes spending the difference for expanded services.
- 13 When passing new immigration legislation, Congress needs to include language that authorizes USCIS to dedicate the funds from fee collections to carry out the legislation.

Improved Oversight:

- 14 Congress should engage in more oversight of: USCIS practices that are not standardized; backlog reduction efforts that continue to fail; security clearance procedures that are not efficient; technology that requires reengineering; and rising application fees that do not result in improved customer service.
- 15 Congress should establish specific processing goals for USCIS and cost controls that facilitate swift and efficient use of immigrant application fees.
- 16 Congress should declare a moratorium on fee increases until USCIS achieves a processing time of six months or less for all citizenship applications in all district offices and the agency meets other customer service benchmarks established in consultation with stakeholders.
- 17 Congress should direct OoC to report on immigrant demographics, federal and state spending on citizenship, and trends in naturalization. The OoC should also conduct studies on naturalization services in immigrant-impacted communities to ensure that productive public and private partnerships exist to promote citizenship and immigrant integration.

Amendments to General Immigration Laws:

- 18 Congress needs to reestablish noncitizen, legal immigrant eligibility for all means-tested public benefits. U.S. citizenship status should be de-linked from public benefit eligibility.
- 19 Congress needs to restore refugee eligibility for SSI without the seven-year limit imposed by welfare reform legislation. The United States should not overlook its humanitarian responsibility for the financial, health, and housing needs of refugees who cannot easily become citizens and who remain poor, unemployable, or ill after their first seven years of resettlement.

New Naturalization Laws:

- 21 Congress should pass a law broadening and extending the English waiver for elderly citizenship applicants who are age 60 or older, allowing them to take the U.S. history and civics test in their native language.
- 22 Congress should not pass laws that restrict or curtail federal courts from hearing naturalization applicants' complaints against USCIS's adjudication decisions or delays.

Improved Immigrant Constituent Services:

- 23 Congressional staff who are assigned to immigration policy and service issues should help immigrants navigate the immigration bureaucracy and resolve long-standing problems. Congressional staff should work with USCIS and community-based organizations to identify solutions to funding and service delivery problems within USCIS. Staff should attend immigration training by nonprofit organizations.
- 24 Congress must authorize USCIS-requested appropriations for backlog reduction.

Promotion of Naturalization and Citizenship:

- 25 Members of Congress should promote naturalization through every means at their disposal, including possible formation of a Citizenship Caucus, public announcements around Citizenship Day, co-sponsorship of naturalization workshops, and participation in oath ceremonies.

U.S. Citizenship and Immigration Services

The U.S. Citizenship and Immigration Services (USCIS) is a bureau in the Department of Homeland Security that was established in 2002 by the Homeland Security Act. The Act split the functions of the Immigration and Naturalization Service (INS) into separate entities, including USCIS, which is responsible for immigration services and benefits. USCIS's priorities, as described on its website, are promoting national security, eliminating immigration case backlogs, and improving customer service.

USCIS's functions include the adjudication of naturalization applications, immigrant visa petitions, refugee and asylum applications, work authorization documents, temporary protected status, and other applications previously handled by the INS. In addition, USCIS is responsible for setting immigration service policies and priorities. The agency is divided into three departments: domestic operations, international operations, and records verification. Naturalization services are located in domestic operations.

The President appoints the director of USCIS who reports to the deputy secretary for homeland security. Approximately 15,000 federal employees and contractors work for USCIS in about 250 offices in the U.S. and around the world. Headquartered in Washington, D.C., USCIS has four service centers assigned to cover different regions of the United States, a central records office in Missouri, and local field offices throughout the country. USCIS has an annual budget of approximately \$2 billion.

In keeping with federal government policy, USCIS currently does nothing to proactively encourage, promote, or facilitate U.S. citizenship. Yet, as the record keeper of all immigrants living in the United States and the agency responsible for adjudicating citizenship applications, USCIS is an excellent position to do more, both in terms of informing eligible immigrants about the benefits and requirements of citizenship and in terms of improving the application process.

Unfortunately, USCIS is plagued with problems that date back to its INS predecessor. A major challenge that has far-reaching implications is the lack of funding. Unlike most federal agencies, including its enforcement counterpart, Immigration and Customs Enforcement (ICE), USCIS receives no regular, annual appropriation from Congress to cover its operations. Instead, Congress provides that the agency may set application fees at a level required to recover the full costs of its services. Because congressional appropriations to USCIS are piecemeal, vary from year to

year, and are usually restricted to certain areas, such as backlog reduction, USCIS is essentially required to fund its operations entirely through application processing fees.

In addition, USCIS does not have full access to the fees it collects or flexibility in spending them. Each year it must estimate how much it will collect in fees and base its budget on this prediction. If applications increase due to unforeseen circumstances such as a new law passed by Congress, the fee revenue also increases, but USCIS cannot access fee revenue above its estimated budget without going through a lengthy and bureaucratic process to obtain congressional permission. As a result, the agency repeatedly incurs a deficit, and application-processing backlogs are created.

The sole reliance on fee revenue creates a vicious cycle of annual application fee increases. The citizenship application fee has more than tripled, from \$95 in 1994 to \$330 in 2005, and USCIS has predicted another increase in fiscal year 2007. While fee waivers are available, they may delay an application for months and are difficult to obtain, even for those who have already been determined low-income by other government agencies, such as the Social Security Administration. If the current trend continues, citizenship will become attainable mainly to middle and upper class immigrants, and will be nearly inaccessible or a severe financial hardship to the low-income and working poor. This disturbing trend presents a major challenge to our democracy, which elected leaders must address.

Another major challenge is poor customer service, though significant improvements have been made in recent years. Despite new online status checks, it is still difficult for applicants to find out the status of their case. Those who call USCIS's National Customer Service Call Center may wait on hold for a long time to speak to a representative. Scheduling an appointment at a local office using the new online scheduling system, called Info Pass, can be similarly time-consuming. During the citizenship interview, USCIS officers may treat applicants rudely or make improper denials, requiring the applicant to pay to file an appeal. After the interview, some applicants are delayed a year or more by the FBI security check and have great difficulty finding out the status of their case. If an applicant needs to submit additional documentation, some offices do not have a reliable system to collect the information and ensure it reaches the applicant's file so the case can be completed. Some local offices also do not have a reliable system for applicants to register a change of address, and continue to send appointment notices to an old address despite being repeatedly informed of a move.

The citizenship interview process is plagued by a lack of consistency so that applicants in different offices, or with different officers in the same office, have widely different experiences in terms of the questions asked, the level of

difficulty of the citizenship test, and the way in which the legal requirements for citizenship, such as good moral character, are applied.

Applicants with disabilities may have difficulty obtaining information on how to request reasonable accommodations. Those applying for a disability waiver, who comprise only about 2-3 percent of all citizenship applicants, are often viewed with suspicion and treated rudely by officers. Officers sometimes fail to follow the correct policies and procedures for handling disability waiver applications and subject vulnerable disabled applicants, who are typically elderly, to unnecessary delays.

How local USCIS offices relate to the community, particularly community-based organizations (CBOs) is also inconsistent. Some offices have excellent relations and regularly hold meetings with CBO representatives who can inquire about cases and be updated on new policies. Other offices, however, have no communication with CBOs and offer no system to inquire about delayed or problematic cases, discuss policies, or address problems. Although the INS drafted guidance on CBO relations for its local offices in 1998, this guidance was never released for reasons that remain unclear.

All of the challenges—funding, customer service, and community relations—have implications for USCIS's ability to handle citizenship applications, and must be addressed under a national citizenship program, which would greatly increase the number of citizenship applications. If these challenges are not addressed, citizenship application backlogs would greatly increase and applicants would be discouraged from applying, undermining the success of the program.

RECOMMENDATIONS:

Funding and Fees:

- 1 When USCIS establishes fee levels, it should not have to include extra costs for the Office of Citizenship (OoC) budget, litigation, military naturalization, or refugee processing. Congress should support these separate, auxiliary costs with annual appropriations.
- 2 USCIS should place a cap on the annual percentage rate of fee increases to control rising costs and ensure that the naturalization process remains accessible for low-income and working poor immigrants.
- 3 USCIS should change its policy on fee waivers to make it less discretionary. Applicants who are already qualified to receive a federal means-tested benefit, such as Supplemental Security Income (SSI) or food stamps, should receive an automatic fee waiver and not have to go through a reevaluation of their income and eligibility.
- 4 USCIS should include more explanation about the availability of fee waivers and the fee waiver application

process in its informational materials, particularly its *Guide to Naturalization*.

- 5 USCIS should create a fee waiver application form so that applicants know what information is required and so that the application process is more standardized.
- 6 USCIS should establish an application filing discount for working poor families when two or more members of an immediate family (parents and adult children) apply for citizenship at the same time.
- 7 USCIS should offer low-income applicants the option of paying the citizenship application fee in two installments. The first installment could be paid at the beginning of the application process and the second, before the interview.

Promotion of Citizenship:

- 8 The USCIS director should publicize the importance of applying for citizenship through frequent speeches, press releases, and public service announcements.
- 9 In its approval letter for lawful permanent residence, USCIS should indicate when the immigrant will be eligible for citizenship.
- 10 Once an immigrant is eligible to apply for citizenship, USCIS should send him or her a reminder along with a citizenship application form.
- 11 USCIS should organize large-scale naturalization swearing-in ceremonies throughout the country on Citizenship Day, the Fourth of July, Constitution Day, and other holidays in order to give naturalization a higher media profile.
- 12 USCIS should mandate that its local offices partner with nonpartisan, civic associations that can conduct voter registration at swearing-in ceremonies. An announcement should be made that voter registration is available and encouraged at the conclusion of each ceremony.
- 13 USCIS local offices should invite civic organizations such as the Rotary Club, Daughters of the American Revolution, and Lions Club to participate in naturalization ceremonies by making speeches, passing out flags, welcoming new citizens, and encouraging civic engagement.

Customer Service:

- 14 USCIS needs to keep its promise, made in 1997 by INS Commissioner Doris Meissner and again in 2000 by President Bush, to reduce its citizenship application processing time for all applications to six months.
- 15 USCIS needs to develop a surge capacity in its workforce to allow it to respond to sudden increases in applications.

- 16 USCIS should improve training and policy guidance for officers handling naturalization applications, especially for those conducting the English, history, and civics tests. Training should be mandated and ongoing.
- 17 USCIS should provide cultural sensitivity training for its officers in dealing with different ethnic groups, the elderly, and people with disabilities. Local CBOs should be invited to make presentations at these trainings.
- 18 USCIS should hold an annual conference for district office directors to share best practices in customer service and community relations.
- 19 USCIS should improve its system to identify naturalization cases that are delayed by the FBI. It should follow up with the FBI at regular intervals until cases are cleared.
- 20 USCIS should send automatic, periodic updates on the status of delayed cases, rather than requiring the applicant to contact USCIS.
- 21 USCIS should strongly encourage its local offices to provide same day citizenship interviews and oaths to streamline customer service.
- 22 USCIS should invite outside guests to speak at oath ceremonies, as occurs at oath ceremonies administered in federal courts.
- 23 USCIS should identify best practices in its local field offices and work to replicate these practices in other offices. It should detail staff from strong to weak offices as necessary.
- 24 USCIS should set customer service standards for field offices and hold them accountable through monitoring and evaluation.
- 25 USCIS local offices need to create a formal procedure for rescheduling appointments. USCIS should allow rescheduling requests by certified mail, e-mail, voice mail, and fax, and it should designate a single point person to respond to all requests and follow through on them.
- 26 USCIS local offices should improve the system used for receipt of additional information from applicants. They should have an on-duty staff member who can accept documents in person, issue the applicant an official receipt, and ensure that the material reaches the officer who requested it.
- 27 USCIS local offices should designate a point person to handle complaints about customer service and respond to them. Unacceptable behavior should be expeditiously corrected.
- 28 USCIS local offices should identify naturalization cases pending more than 120 days after the interview and prioritize them chronologically.

Disability Waivers and Reasonable Accommodations:

- 29** USCIS should ensure that disability waiver cases are adjudicated in a timely fashion. USCIS headquarters should intervene with training and, if necessary, disciplinary measures in problem offices.
- 30** USCIS should survey its local offices on the implementation of reasonable accommodations and disability waiver guidance, and compile best practices to share with field offices.
- 31** USCIS should issue additional guidance to facilitate naturalization for disabled and elderly applicants, particularly addressing the issues of dementia, post traumatic stress disorder, and depression. It should remind local offices of the standard of review for these cases and the need for courtesy, respect, and sensitivity.
- 32** Based on the due consideration provision in 8 CFR § 312.2(c)(2), USCIS should create a new category of “special consideration” applicants for those facing loss of SSI so they may receive an easier test on English, history, and civics.
- 33** USCIS should issue nondiscretionary policy and processing guidance to service centers and local offices, that describes how elderly and disabled applicants who are facing the loss of SSI can have their applications expedited.
- 34** USCIS should utilize Form N-648B (Notice of Incomplete N-648) and update the form so that it parallels the revised Form N-648 (Medical Certification for Disability Exceptions).
- 35** USCIS should create a master list of staff who are handling requests for reasonable accommodations in each local office, along with working telephone numbers and e-mails. It should post the list on its website, and designate accommodations point persons to act as ombudsmen for disability waiver problems.
- 36** USCIS should have a tab on its homepage called, “people with disabilities and the elderly.” When users click on the tab, they should be able to access statutes, regulations, and user-friendly guidance on waivers from English, civics, and oath taking requirements and on reasonable accommodations. The tab should provide access to the N-648 form and information on how to expedite an application if loss of SSI is imminent.
- 37** USCIS should create a “Frequently Asked Questions” or FAQ sheet on disability waivers and reasonable accommodations. It should post this sheet on its website for use by medical providers, immigration advocates, the elderly, people with disabilities, and OoC community liaison officers.

- 38** USCIS policy requires field offices to provide information to applicants on how to request reasonable accommodations. USCIS should draft a sample information packet that summarizes information on waivers and reasonable accommodations.
- 39** USCIS should partner with CBOs to offer doctors periodic training on disability waiver eligibility and on how to complete the N-648 form.

Community Relations and Communications:

- 40** USCIS should issue policy guidance to its field offices on how they should relate to CBOs. Minimum standards should include quarterly meetings with CBOs, shared agendas that cover policy issues, and a mechanism for CBOs to make case status inquiries and to obtain timely responses.
- 41** Local USCIS offices should send regular e-mail updates to community organizations on policy or procedural changes.
- 42** Local USCIS offices should work closely with citizenship teachers and allow teachers to observe interviews so they can better prepare their students. USCIS offices should set up a hotline, manned by a supervisor, which teachers can call if one of their students has a problem in the interview.
- 43** USCIS should study the option of conducting off-site interviews in the offices of community-based organizations to increase accessibility for elderly and disabled applicants.
- 44** USCIS offices should develop a process for soliciting input from the local community on problems and recommended solutions, particularly those related to communications and customer service.
- 45** Local USCIS offices should train citizenship workshop volunteers and send staff to citizenship workshops who can answer questions about naturalization law, policy, and applications.
- 46** Local USCIS offices should provide regular statistics to community organizations on the number of citizenship applications received, approved, and denied.
- 47** USCIS local offices should provide CBOs with an organizational chart that includes the names of supervising officers and general duties.
- 48** USCIS local offices should hold periodic open houses to allow CBOs to tour the facilities.

The Office of Citizenship

The Office of Citizenship (OoC) is a branch of the United States Citizenship and Immigration Services (USCIS), a bureau of the Department of Homeland Security (DHS). OoC was established by the Homeland Security Act of 2002. Its mission, as mandated in its authorizing legislation, is to promote instruction and training on the rights and responsibilities of citizenship and to provide immigrants with the information and tools needed to successfully integrate into American civic culture. The office is funded by revenues received from USCIS application fees, and has an annual budget in fiscal year 2007 of approximately \$3 million. Its chief is appointed by the President.

OoC has focused on providing information to immigrants when they become Lawful Permanent Residents and are ready to begin the naturalization process. Its strategic goals are centered on outreach to permanent residents, improving and disseminating citizenship education materials, and promoting and enhancing citizenship-related ceremonies, such as swearing-in ceremonies.

The office is divided into two sections, outreach and programs. In the outreach section, headquarters staff includes a deputy chief and four staff officers. In USCIS districts, there are approximately 20 community liaison officers whose job is to work with local stakeholders such as community-based organizations, adult educators, and local officials to further OoC's objectives. The program staff is comprised of a deputy chief and four staff officers at USCIS headquarters. The programs section, with contractual support, is responsible for creating, developing, and publishing civics and citizenship educational materials. Some of the materials published so far include:

- *Welcome to the United States, A Guide for New Immigrants* is a comprehensive guide, available online in 11 languages, and is the first time that the federal government has provided orientation materials for new permanent residents;
- *Civics Flash Cards* is an instructional tool for naturalization test preparation; and
- *Learn About the United States: Quick Civics Lessons and Audio CD* are short lessons based on each of the history and civics questions on the citizenship test.

Due to funding limitations, OoC is not able to offer printed hard copies of key materials, such as the *Welcome to the United States* guide and the civics flashcards, to the public for free; rather, they must be ordered from the Government Printing Office for a fee. All of the materials are available free online in PDF format. In fiscal year 2007 the OoC plans to give a free hard copy of *Welcome to the United States* to all new permanent residents. Currently, all natu-

ralization applicants can get a free copy of *Learn About the United States: Quick Civics Lessons* when they have their fingerprints taken at a USCIS Application Support Center.

Soon after it was established, the OoC held a series of focus groups in local communities to identify immigrant integration needs and challenges in order to shape its objectives. The findings are published in a document available on OoC's website, entitled *Helping Immigrants Become New Americans: Communities Discuss the Issues*. The OoC also sponsored a conference in September 2004 on the civic integration of immigrants entitled, *Building a Common Civic Identity*.

In April 2005 OoC took over responsibility for the redesign of the citizenship test. Since then, the office has been meeting regularly with stakeholders involved in the naturalization process and working under a deadline of January 2007 set by its chief for completion of the new test.

Although OoC has produced such useful informational products for immigrants, its shoestring budget prevents these products from being readily available, particularly for immigrants without access to the internet. OoC's budget for its nationwide programs is only \$3 million, comparable to the amount spent by one state—Illinois—for its statewide citizenship initiative. The legislation establishing OoC failed to appropriate any public dollars to support its work beyond staffing costs, hindering the office from fulfilling its public information mission.

Congress's authorizing legislation limited OoC's mission to educational activities, effectively creating a public information unit. The legislation failed to give the office clear grant-making authority that would allow it to fund nonprofit organizations engaged in implementing services to promote citizenship and provide application assistance. An independent task force convened by the Chicago Council on Foreign Relations recommended grant-making authority for OoC in its report, *Keeping the Promise: Immigration Proposals from the Heartland*.¹ Members of Congress should acknowledge and address the current lack of sufficient financial support for OoC's limited mission. Otherwise, the OoC's work is more symbolic than a resource for the nation.

Despite OoC's current limitations, the office has great potential as a lead government agency in a national citizenship plan. Its mission encompasses all immigrant populations, as compared to the Office of Refugee Resettlement (ORR), which focuses primarily on refugees. In addition, OoC ranks higher on the DHS organizational chart and has far more visibility and authority than ORR does within the Department of Health and Human Services. Moreover, through its 20 local community liaison officers and its

national-level partnerships, the office is well networked and has the capability to reach out widely in the immigrant community to promote the message of citizenship.

RECOMMENDATIONS:

Legislation:

- 1 Congress should provide grant-making authority to OoC to allow it to fund nonprofit organizations that offer citizenship assistance.
- 2 Congress should appropriate an annual budget to OoC in order to allow it to distribute its materials free of charge; fund citizenship outreach, application assistance, and classes by nonprofit organizations and community colleges; and reach its full potential as the lead agency for a national citizenship program

Programs:

- 3 OoC should create a central clearinghouse of citizenship education materials. These materials should be available on the web in written and audiovisual form.
- 4 OoC should support and facilitate training on how to teach history and civics for teachers of English as a second language (ESL) and on how to teach ESL for civics teachers.
- 5 OoC should provide civics and citizenship preparation content to the Department of Education so it can expand its English language and civics curriculum.
- 6 OoC should provide a free toolkit for training ESL and citizenship teachers on U.S. history and civics, with guidelines, posters, written materials, and audiovisuals.
- 7 OoC should partner with the American Library Association to forge a working group on immigrant integration. The group should explore ways to distribute the OoC publication, *Promising Practices for Immigrant-serving Libraries*.
- 8 OoC should lead a national citizenship campaign using outreach materials such as posters, educational information, publications, and public service announcements. The campaign should promote and encourage naturalization and provide templates of outreach materials for local service providers.
- 9 OoC should sponsor and fund a teacher-training institute bringing local teachers together with national experts to provide training on civics education. Using a train-the-trainers model, the attendees could train their colleagues in their home communities.
- 10 OoC should promote consistency and standards in citizenship education by developing model training and materials for teachers, and making this information widely available.

- 11 OoC should develop interactive, web-based self-study materials for immigrants who wish to prepare for the citizenship test on their own.
- 12 OoC should help promote Citizenship Day on September 17 by pursuing a Citizenship Day commemorative stamp, sponsoring a poster contest for school children, and encouraging media to cover oath ceremonies held on Citizenship Day.
- 13 OoC should conduct an annual mass media campaign around Citizenship Day. The campaign could include a host of activities starting on July 4 and leading up to September 17, including TV commercials, large-scale citizenship workshops, and other events.
- 14 OoC should develop citizenship promotion materials such as posters, pins, badges, and citizenship kits for distribution at oath ceremonies and other naturalization functions. It should also develop materials for schools to enable them to offer a lesson unit on the history of U.S. immigration.
- 15 OoC should conduct focus groups to determine the level of interest and feasibility of holding citizenship “affirmation” ceremonies for children who became citizens automatically by derivation. The ceremonies could be arranged by local civic groups.
- 16 OoC should continue to organize and publicize high profile naturalization ceremonies to raise public awareness of citizenship and naturalization.
- 17 OoC should create and disseminate public service announcements by celebrities or other well-known spokespersons that promote citizenship.
- 18 If it receives grant-making authority, OoC should set benchmarks for its grantees to measure improvements in immigrant integration.
- 19 OoC’s community liaison officers should facilitate the participation of local civic organizations, such as the Rotary Club, Daughters of the American Revolution, and Lions Club, in administrative oath-taking ceremonies. Civic organizations can contribute by making speeches, passing out flags, welcoming new citizens, conducting voter registration, and encouraging civic engagement.
- 20 OoC should develop a guide that describes model citizenship programs by businesses. The guide should include endorsements by participating businesses and materials for marketing citizenship to the business sector.
- 21 OoC should create a free citizenship video that is distributed by movie rental chains and public libraries.

Communications:

- 22 OoC should expand the number of community liaison officers to ensure that there is one in every USCIS district.
- 23 OoC's community liaison officers should facilitate periodic meetings between district office examiners and citizenship educators to allow examiners to give feedback to teachers on ways students are not being prepared adequately.
- 24 OoC should maintain an up-to-date master list of ethnic media outlets for use in its national campaigns.
- 25 OoC should develop and maintain a comprehensive list of state contacts involved with immigration and civic integration, such as officials from state governors' offices and state refugee offices. The list should include a contact in each state who will receive and disseminate citizenship and integration materials statewide.
- 26 OoC should use the President's new Task Force on New Americans to promote a national citizenship plan. The task force should help coordinate integration services, disseminate information on integration activities, and inform agencies on policy and procedural issues affecting immigrants.
- 27 OoC's community liaison officers should maintain a list-serve of community-based organizations and coordinate with OoC's national office to inform community organizations of changes in naturalization policies and procedures.
- 28 OoC should work with immigrant organizations, funders, and USCIS to build consultative processes on immigration. These processes should inform legislators and others on challenges facing local communities.

Funding:

- 29 If given grant-making authority, OoC should fund demonstration projects on immigrant integration in order to identify and promote best practices.
- 30 OoC should survey states about whether they have funding for citizenship assistance and maintain information on citizenship funding. Such a survey would serve as a resource for OoC and for private funders.
- 31 OoC should coordinate its future funding of citizenship classes with the Department of Education in order to ensure maximum geographical coverage and the best allocation of scarce resources.
- 32 If given grant-making authority, OoC should fund nonprofit agencies to provide technical assistance to local organizations that are engaged in application assistance and citizenship classes.
- 33 OoC should provide information and resources to corporations that may be interested in supporting citizenship activities, such as worksite ESL classes.

- 34 OoC should consult and work in partnership with ORR to track funding for citizenship and civic engagement in states and cities, and it should publicize this information.
- 35 OoC should leverage support for nonprofit citizenship activities from the philanthropic and corporate sectors, educating these sectors about the importance of citizenship and integration, and about the contributions they can make.

1 The Chicago Council on Foreign Relations. Report of an Independent Task Force. *Keeping the Promise: Immigration Proposals from the Heartland* (June 2004).

The Office of Refugee Resettlement

Established by the Refugee Act of 1980, the Office of Refugee Resettlement (ORR) is a division of the Administration for Children and Families within the U.S. Department of Health and Human Services (HHS). ORR's mission is to assist refugees and other special populations to achieve economic and social self-sufficiency in the United States. To this end, ORR funds and facilitates various programs that offer benefits and services, including temporary cash and medical assistance, employment preparation and job placement, skills training, English language classes, social adjustment assistance, and aid for victims of torture. Eligible populations served by ORR are refugees, asylees, Cuban and Haitian entrants, certain Amerasians, and victims of severe forms of trafficking. Together, these groups comprise about 10 percent of the immigrant population. The President appoints ORR's director.

ORR's chief partners are state refugee offices responsible for overseeing resettlement in their states and disbursing ORR funds to local service providers. Other key ORR partners include the nine national voluntary agencies authorized by the Department of State's Bureau of Population, Refugees, and Migration to sponsor and resettle refugees and the ethnic-based refugee community organizations called "mutual assistance associations" or "MAAs."

The President and Congress determine ORR's budget, based on the refugee admissions ceiling set each year by the President in consultation with Congress, as well as estimates on the number of refugees and other populations anticipated to be served. ORR provides formula grants to states, based on an average of refugees served over a three year period, and discretionary grants to both state and nonprofit organizations. Other categories of funding are based on ORR's programs and priorities.

ORR has more than 26 years of experience in the successful economic and social integration of refugees. Each year, as required by the Refugee Act, ORR reports to Congress on its programs and outcomes, admissions to states, refugee national origins, and refugee self-sufficiency and social integration. In 2003 ORR reported that about 55 percent of refugees age 16 or over were employed, compared to 62 percent for the overall U.S. population. The labor force participation rate for refugees was about 61 percent, compared to 66 percent for the U.S. population as a whole, while the refugee unemployment rate was lower than that of the U.S. population, 5.7 percent compared to 6.0 percent.

Following the welfare reform laws of 1996, which set strict time limits on refugee eligibility for public benefits, ORR elevated the importance of citizenship services. In 2000 ORR changed its regulations to designate citizenship assistance as a categorical social service, thus allowing it to be an ORR-funded activity. It began several new initiatives to naturalize refugees, especially vulnerable elderly and disabled refugees, in order to preserve their eligibility for public benefits.

In 1998 ORR provided \$9.625 million in grants to 20 states for citizenship and social services for elderly refugees affected by welfare reform. The program aimed to assist them to naturalize and to access traditional services for the aging. It also funded the Catholic Legal Immigration Network, Inc. (CLINIC) to provide technical assistance to the states and over 100 local grantees working with refugee elders.

Also in 1998, ORR provided \$2,392,541 million for 20 citizenship grants in 18 states. The purpose was to provide citizenship education and application assistance to refugees who had met, or were within one year of meeting, the five-year residency requirement for citizenship. The program targeted refugee groups that had historically low naturalization rates due to language, cultural, or other barriers. In subsequent years, ORR continued to fund citizenship assistance, though the level of funding decreased significantly because of federal revenue shortfalls starting in 2001.

In addition to citizenship assistance services, ORR has funded citizenship trainings, conferences, and publications, such as *A Time for Decision: Citizenship at the Millennium* and two CLINIC handbooks, *Citizenship for Us: A Handbook on Naturalization and Citizenship* and *Citizenship for Refugee Elders: Issues and Options in Test Preparation*.

Despite its important funding of citizenship assistance, ORR is not in the best position to lead a national citizenship program. Its mandate is limited to refugees and other special populations, who are only about 10 percent of the foreign-born population. However, many of ORR's service

delivery models for refugee self-sufficiency and integration are ground-breaking, and these models could be expanded and applied to other immigrant populations. Refugees are 1.5 times more likely to naturalize than other immigrant groups, an indication of their social integration and the success of ORR's programs.¹

In a national citizenship campaign, ORR can play an important supporting role to the broader work of the Office of Citizenship of the U.S. Citizenship and Immigration Services (USCIS).

RECOMMENDATIONS:

Programs and Services:

- 1 ORR should work with the Department of State to ensure that resettlement agencies provide information on the benefits and requirements of citizenship in cultural orientation classes for newly arrived refugees. The classes should instruct refugees to naturalize as soon as they are eligible and to avoid activities that may jeopardize their eligibility.
- 2 ORR should require its grantees to provide information to newly arrived refugees on the need to apply for a green card after one year in the United States, and to follow-up after one year to assist them with the application.
- 3 ORR should require its grantees to assist all eligible male refugees and other populations that it serves to register for Selective Service (a naturalization requirement) upon their arrival to the United States. Alternatively, ORR should work with the State Department's Office of Population, Refugees, and Migration to ensure that Selective Service registration is included as a required service in resettlement agencies' reception and placement contracts and grants.
- 4 ORR should assist its grantees providing English as a second language services to obtain Department of Education funding by building their capacity in grant writing, reporting, and program evaluation.

Collaboration:

- 5 ORR should meet regularly with the OoC to discuss shared goals and interests, and should assist OoC in tracking citizenship funding by states and cities and making this information publicly available.
- 6 ORR should encourage research to study refugee integration, including naturalization rates, and what lessons can be learned from refugees and applied to other populations.
- 7 ORR should encourage research on hard-to-naturalize refugee populations to identify barriers and promote best practices in serving them.

Funding:

- 8 ORR should recognize the legal immigration and citizenship needs of refugees by funding citizenship assistance as a key service.
- 9 ORR should make outreach to elderly and disabled refugees on Supplemental Security Income (SSI) a funding priority, to ensure they receive English language training, aging services, and citizenship application assistance before losing their benefits.
- 10 ORR should provide flow-through citizenship funding to national nonprofit organizations rather than states. These organizations add value by providing technical assistance to local citizenship service providers (their sub-grantees) and by leveraging more dollars from private funders.
- 11 ORR should annually track its naturalization-related funding, including funding for English language classes, citizenship outreach, and application assistance. It should provide steady funding for this work.
- 12 ORR should fund citizenship preparation classes for refugees, either separately from its English classes or as a component within English classes for those who desire it.

Policy Development:

- 13 An ORR representative should attend all citizenship-related meetings between community-based organizations and USCIS to stay informed about new policy developments and challenges, and to advocate on policies affecting refugees.

Citizenship Promotion:

- 14 ORR should publicize the high rate of refugee naturalization as a hallmark of success in refugee integration, and should promote naturalization as the ultimate goal of integration.
- 15 ORR should promote citizenship for refugees in its publications and on its website. Its website should have information on citizenship requirements and benefits, and should link to the USCIS website.
- 16 ORR's annual consultation with grantees should include sessions on citizenship, including best practices and lessons learned.
- 17 ORR should provide long-term funding to a national organization that can provide technical assistance to refugee service organizations on naturalization, citizenship and civic participation.

1 Fix, M., Passel, J., & Sucher, K. *Trends in Naturalization* (Washington, DC: Urban Institute, September 2003).

State Governments

The policies of state governors and legislatures deeply affect the daily lives of immigrants. State legislators have the authority to make laws separate from federal authority, and they take up an array of issues including taxation, budgets, economic development, education, health, human services, criminal justice, natural resources, transportation, elections, and redistricting.

The policies of immigration and immigrant integration are a topic of growing debate between states and the federal government. The federal government holds sole authority to make immigration laws affecting the number, type, and nationalities of immigrants arriving legally each year. It also has ultimate responsibility to enforce immigration laws, regulate national borders, and remove people from the country. Yet its actions deeply impact state demographics, revenues, expenses, health care services, education, and many other areas. As a result, state legislators are increasingly vocal about the apparent disconnect between federal lawmaking on immigration and realities at the state level.

These tensions attest to the nation's lack of an immigrant integration policy. Because of federal control over immigration policy, local officials and residents feel disempowered to deal with challenges in communities that have significant numbers of immigrants. In town hall meetings, teacher-parent assemblies, local media, and election campaigns, debates rage over the positives and negatives of educating a growing and diverse foreign-born population of school-aged children, serving the medical and social service needs of working poor families and those who speak limited English, establishing day laborer sites for underemployed adults, and dealing with undocumented newcomers.

Helping states navigate the intricacies of immigration and immigrant integration policies and practices is the National Conference of State Legislatures (NCSL). As a bipartisan organization, it serves legislators by providing research, technical assistance, and forums for policy exchanges on pressing state issues. It also advocates for state government interests before Congress and federal agencies.

NCSL's Immigrant Policy Project, established in 1992, has presented state concerns to the federal government on immigration reform for the undocumented; enforcement of immigration and labor laws; tuition support for undocumented students; restoration of federally funded, means-tested benefits to legal, noncitizen immigrants; citizenship; and specific immigrant integration practices for national promotion.

The project has identified how states implement immigrant programs mandated by federal or state law and provide services ordered by courts. Too often states bear the brunt of federal policies. As a result, states have sought to: offset the expense of means-tested benefits stripped by the 1996 Personal Responsibility and Work Opportunity Act; establish in-state tuition costs for undocumented youth seeking a college education; expand the availability of English and employment training classes for limited English speakers; and fund short-term, statewide naturalization initiatives.

Citizenship Ceremony Influences Elected Official

After attending a citizenship ceremony, Virginia state Sen. Emmett W. Hanger Jr. (R-Augusta) reversed his opposition to offering in-state tuition rates to undocumented youth seeking a public college education. Sen. Hanger cited two factors for his change of heart. Immigrant advocates made a strong case, explaining the benefits to the state in having undocumented youth better educated and not under-employed. On a more personal level, his son's fiancée, an immigrant from the Philippines, had just become a U.S. citizen. Sen. Hanger attended the naturalization oath ceremony of his soon-to-be daughter-in-law and was greatly inspired, saying: "When those immigrants become citizens and the oath of loyalty they take, and what they go through to do that . . . it makes you appreciate the citizenship we enjoy."

The NCSL supports citizenship as a national priority to move immigrants into the mainstream of American cultural, economic, and political life. As its policy statement says: "States have led the way in easing barriers for eligible newcomers to become U.S. citizens. . . . We encourage the federal government to address barriers to naturalization and assist states in their efforts."¹

Historically states have played a key role in citizenship efforts. In the early twentieth century states supported citizenship promotion as part of the "Americanization" movement. Because of this push, immigrants received more information, earlier, on citizenship benefits, requirements, and procedures than they do today. In the late 1990s, primarily as a response to the crisis posed by the 1996 federal welfare law, states partnered with community-based organizations to help immigrants become citizens through outreach, English and civics classes, and application assistance. However, these naturalization initiatives were short-lived because of shrinking state budgets starting in 2001 and the abiding belief by most state leaders that

citizenship projects, although worthy of support, should be funded by the federal government as part of its national authority over immigration.²

Because of a lack of a national citizenship program, individual states have dealt with naturalization in strikingly different ways. California has in 2006 an estimated 2.7 million immigrants eligible for naturalization. California's funding for citizenship swiftly eroded in recent years. In 1999 under Gov. Gray Davis, the legislature approved \$7 million for a naturalization program supporting application services and legal assistance. Funding fell to \$2 million in 2003, and Gov. Arnold Schwarzenegger, facing rising revenue shortfalls, terminated the project on December 31 of that year. After much public advocacy, the legislature approved \$1.5 million in the fiscal year 2005-2006 budget and increased the appropriation again to \$3 million in fiscal year 2006-2007.

The state of New York funds citizenship services chiefly through its Bureau of Refugee and Immigration Affairs in a program called the New York State Citizenship Initiative (NYSCI). NYSCI began in 1996 in response to compulsory cuts in public assistance to legal immigrants under the new federal welfare law. Since 1996, funding has remained consistent, but not expanded. In October 2003 the state legislature budgeted \$2.5 million for community-based citizenship programs. Of that, \$660,000 was dedicated to an ongoing New York Immigration Hotline, linking immigrants with information specialists speaking 19 languages. Citizenship grants are administered on a three-year cycle.

Illinois has the sixth largest population of immigrants eligible to become citizens—at 340,000.³ Yet it has the most active citizenship agenda of any state, through two strong programs. After the first program, the Bureau of Refugee and Immigrant Services' Refugee and Immigrant Citizenship Initiative (RICI) was established, naturalizations doubled in the Immigration and Naturalization Service Chicago District. In 1999 Illinois significantly expanded the bureau's budget authority and services from just refugees to all legal immigrants. In 2006 the bureau's budget is \$5.15 million. RICI, with a budget of \$2.5 million, delivers English language and civics instruction, as well as application assistance, to an annual average of 13,000 people, representing over 104 nationalities. Half of RICI's budget is used by community organizations targeting Latinos, a population with a low naturalization rate and the greatest educational and legal needs. Immigrants' accomplishments through RICI inspired many to pursue further language and skill development, and led to their civic participation.

Illinois's second citizenship program is the New American Initiative (NAI). On April 21, 2004, Gov. Rod Blagojevich announced his support for the initiative, asking for a \$3 million appropriation. Funding was directed to the Illinois

Department of Human Services and granted to the Illinois Coalition for Immigrant and Refugee Rights (ICIRR). In its first year of operation, ending in June 2005, NAI's budget supported 11 collaboratives, involving 51 community-based organizations, which helped 2,879 immigrants complete naturalization applications. The initiative expects to assist even more immigrants to complete applications and see more new citizens take the oath of allegiance in 2006. The extensive experience gained by government agencies and community-based organizations in Illinois makes the state both a test tube and potential model for a federally-funded national citizenship program.

The Maryland legislature established the Maryland Office for New Americans (MONA) in 1994 to provide coordination of services to refugees and consultation to the Governor and General Assembly. State legislation passed in 1995 established a citizenship promotion program, administered by MONA, to encourage and assist eligible immigrants to become U.S. citizens and to become civically engaged. Funding for the program was capped at \$100,000 per year. Activities authorized in the legislation included outreach, instruction, application assistance, and voter registration. Due to the program's limited budget, activities have been restricted to citizenship classes.

Massachusetts established its Office for Refugees and Immigrants (ORI) in 1985. ORI's Citizenship Assistance Program (CAP) started in 1997. Its primary concern was to assist immigrants at risk of losing federally supported public aid to become citizens and thereby regain eligibility, thus saving the state from having to fund compensatory aid. CAP was initially funded at \$2 million in 1997. Over the years, funding fell to \$1.5 million, then \$750,000. In 2002, Acting Governor Jane Swift eliminated CAP. In 2006, Massachusetts' legislature appropriated \$500,000 for CAP.

The Florida Office of Refugee Services released a Request for Proposals in 2001 for a comprehensive refugee citizenship project, including naturalization outreach, legal assistance, refugee adjustment of status legal assistance, English literacy and conversation, and naturalization test preparation assistance. In a competitive bid, Catholic Legal Immigration Network, Inc. (CLINIC) and its consortium of eight local, charitable immigration programs won the largest award of \$4,054,601 for an 18-month contract. In 2002, the Office of Refugee Services awarded CLINIC a second contract for two years in the amount of \$4,152,634 with the understanding that the second year of the contract would be optional, depending on the numerical success of the first year and the continuing need for naturalization services for at-risk refugees. Despite the success of the program, the Refugee Services Office canceled the final 12 months of the contract with 30 days notice, abruptly ending services for hundreds of applicants in the naturalization process and hundreds more in the midst of their required English language classes.

State funded efforts to provide naturalization and language services have been crucial, especially since federal efforts have been modest and waning. State governors and legislatures have played a critical role in informing the public and federal authorities of the local experiences of immigrants and receiving communities. Legislatures and the NCSL have made citizenship a feature of their immigrant policy. Even so, our nation's best efforts to naturalize immigrants should not be determined by which state has the political will or budget.

The millions of immigrants eligible for citizenship, coupled with the numerous, successful local efforts made by community organizations, should give federal and state government ample motivation to pursue a national citizenship plan.

RECOMMENDATIONS:

Funding:

- 1 State governors and legislators should advocate for expanded funding for English and civics instruction for immigrants through appropriations to the Workforce Investment Act.
- 2 State legislators should ensure that federal dollars for English and civics education are accessible not only to institutions of higher education but also to community-based organizations. This will ensure that immigrants seeking these services outside of college can receive them. State funding should be structured to support different institutions serving all persons in need of English and civics instruction.
- 3 States should provide funding to state refugee resettlement offices to promote long-term refugee integration through English language training, naturalization, and civic engagement programs. This will supplement Office of Refugee Resettlement (ORR) funding, and will be particularly necessary when ORR state-formula grants do not suffice.
- 4 States should provide funding for multiyear citizenship education campaigns in order to maximize the effect of a national campaign.
- 5 States should fund citizenship and civic integration programs that fill the gaps left by national funding.
- 6 State-funded citizenship programs should augment a national program by focusing on metropolitan communities which have the greatest need and insufficient federal funds, and on smaller immigrant gateway communities.

- 7 State governors and legislators should work closely with statewide immigration coalitions to secure funding and further policy priorities related to integration and citizenship services.
- 8 State legislators should support charitable organizations that serve immigrant integration needs by helping them to leverage local private dollars.

Policy Development and Advocacy:

- 9 State governors and legislators should continue to advocate for restoration to immigrants of federal means-tested benefits, such as Medicaid, Supplemental Security Income (SSI), and food stamps.
- 10 State governors and legislators should advocate for the full restoration of SSI benefits for noncitizen refugees beyond the seven year limit.
- 11 State governors and legislators should advocate for reduction of U.S. Citizenship and Immigration Services (USCIS) application processing backlogs and increased federal funding for this purpose.
- 12 State governors should highlight the contributions of immigrants to their states.

State Legislation:

- 13 State legislators should work with state bar associations and community-based legal immigration service agencies to pass laws that criminalize the unauthorized practice of law. They should also appropriate monies to enforce these laws.

New and Expanded State Authority:

- 14 State legislators should appropriate sufficient funding to immigrant affairs offices. These offices should be tasked with improving government relations and services with foreign-born communities, fostering greater integration between native and foreign-born residents, and coordinating federal and state policies and services that affect immigrants.

State Government Oversight and Coordination:

- 15 State legislators and the NCSL should press for better coordination by federal authorities of immigrant integration programs.
- 16 States should use their databases of refugees who receive SSI to send notices to those facing the seven-year eligibility limit and to encourage them to seek naturalization assistance from a list of charitable immigration programs.

- 17 The NCSL's Immigrant Policy Project should help coordinate federal and state citizenship program design and data collection efforts. It should identify best practices, new implementation strategies, and evaluation methods.
- 18 State citizenship and civic integration programs should be coordinated between community-based organizations and state-funded institutions, including public colleges and schools, libraries, health programs, motor vehicle registrars, and voter registrars.
- 19 State-funded English language providers should be instructed on how to give students nonlegal information on naturalization benefits and eligibility requirements, and how to offer referrals to naturalization services.

Research:

- 20 States should develop citizenship programs by studying the institutions that played a significant role in the Americanization movement at the beginning of the twentieth century and identifying positive practices of the era that can be revived for today's immigrant integration and citizenship needs.
- 21 States should support independent research on statewide, noncitizen demographics, along with surveys of immigrant priorities.
- 22 State legislators should partner with the NCSL by funding research on the economic benefits of citizenship.

Promotion of Program Models:

- 23 State legislators, through the NCSL, should convene immigrant integration policy and practice meetings to explore citizenship promotion campaigns, naturalization assistance models, English and civics education curricula, and programs leading to naturalization and civic engagement.
- 24 State citizenship programs should support all aspects of immigrant integration. They should generate broad support particularly from immigrant communities.
- 25 State-supported immigrant integration models need to reflect multidirectional influences, with different immigrant groups as interfacing with each other and with the native-born.
- 26 State governments should identify dynamic, low-cost ways to provide English language and naturalization training locally through websites, DVDs, ipods, and viewer-controlled TV program selection devices similar to TIVO and Cable On Demand.
- 27 State legislators should sponsor naturalization application workshops in collaboration with congressional representatives and community-based organizations.

Promotion of Civic Education and Engagement:

- 28 State Departments of Education should offset the declining civics education in local schools by funding classroom learning and extracurricular activities that promote American ideals and values.
- 29 State legislatures should institute annual Immigrants' Days in which youth and adult immigrant leaders could observe local government in action.
- 30 State legislators should institute an immigrant-mentoring program for youth and adult immigrant leaders who have a strong interest in elected office or other forms of community leadership.

Improvement of State Services to Immigrants:

- 31 States should identify barriers for immigrants that need to access services which promote health, education, and family.
- 32 State registrars should ensure that voter registration activities are accessible to eligible foreign-born voters. They should ensure the integrity of registration systems to avoid confusion in determining who is eligible to register to vote.
- 33 State departments of motor vehicles should be properly trained in the correct application of laws that seek to restrict access to driver's licenses so as not to improperly deny licenses to eligible immigrants.

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- 1 National Conference of State Legislatures. "Refugee Assistance and Immigration Reform," para. 16, available at: <http://www.ncsl.org/statefed/HUMAN.htm>
 - 2 Morse, A. and Orgocka, A. *Immigrants to Citizens: A Role for State Legislators* (Washington, DC: National Conference of State Legislatures, 2004).
 - 3 Fix, M., Passel, J.S., & Sucher, K. *Trends in Naturalization* (Washington, DC: Urban Institute, September 2003).

City Governments

City governments are generally comprised of locally elected mayors, council representatives, and other elected and appointed officials who administer city services. The composition of city government and the authority of officials are shaped by the city's charter. Mayors and council members have lines of authority similar to governors and state legislators but are restricted to local affairs within a municipal boundary using locally controlled revenues. As such, local and state representatives manage parallel issues of taxation, budgets, work force development, schools, social services, housing, law enforcement, voter registration, and elections. These issues significantly impact the quality of life for local residents and the city's appeal to prospective residents, including immigrants.

Immigrant population growth in a particular city is chiefly dependent on the presence of sponsoring family members or employers, in addition to good job prospects. Close behind these draws are the availability of affordable housing, quality schools, safe neighborhoods, and a welcoming environment for newcomers, particularly people of color and those who speak English as a second language. In many respects, immigrants and native-born residents share the same preferences for city residence and the same concerns for government action.

At the local level the impact of immigrants, particularly newer arrivals, is most acutely experienced by long-term residents. City governments have the opportunity to benefit from a population diversified in age, ethnicity, language, culture, and employment skills and have a special responsibility to stem social polarization. Immigrant "gateway" cities, so called for their sudden and rapid rise in new, foreign-born residents, are experiencing the most challenges because they lack the infrastructure to serve immigrant needs effectively, something that historically immigrant-based cities like New York, Chicago, and Los Angeles have had decades to develop.

The lack of a federal immigrant integration policy leaves cities and states to respond by themselves to the integration needs of the foreign-born. Pressing concerns common to growing cities, particularly those that are immigrant-impacted, include: an increase of school children who speak limited English, the challenge of absorbing newly arriving refugees, undocumented immigrants ineligible for publicly funded services, lack of affordable housing for larger than average families, a rising need for medical and social services for low-income families, contested day laborer site locations, occasional uncooperative relations between immigrants and law enforcement, and an increased demand for adult-based English and job training classes.

Despite these challenges, local governments routinely credit immigrants with countering slow economic growth and aging population trends. City governments also appreciate that immigrants revitalize dilapidated neighborhoods with improved housing and new, small businesses. In social terms, immigrants are applauded for their strong family values and pursuit of the American dream through education, hard work, and citizenship. It is not uncommon to hear that the high school valedictorian is foreign-born or a child of immigrants. Local news programs routinely feature heart-warming stories of immigrants becoming U.S. citizens.

The best local approaches see integration as a two-way, if not a multidirectional, process between immigrants and receiving communities. Well-developed integration strategies recognize that immigrant-impacted cities are often comprised of dozens of ethnic groups and that immigrants are now, more than ever, choosing both urban centers and suburban areas as their place of first residence in the United States. City integration services tend to help those at risk of family disintegration, economic dependency, low academic achievement, or criminal conduct.

Of great importance in integration is the city's role in attracting large and small businesses that offer workers a living wage and healthcare coverage. Correspondingly, city governments seek to attract residents who possess education and job skills that are desirable to employers. In this nexus, city governments and businesses recognize the need for foreign-born labor but also the need for immigrants to access English language and job skill training programs to improve their job prospects. Unfortunately, the demand for these programs exceeds availability. Classes often have long waiting lists or are not offered at times to fit the schedules of the working poor with childcare responsibilities. Therefore, to sustain the economic growth of their communities, cities use a combination of federal, state, and local revenues to support the educational needs of workers who speak limited English.

In an effort to welcome and integrate immigrants, it is increasingly common for city governments to set up chartered offices focusing on the needs of immigrant populations. For example, the cities of Boston, Houston, Los Angeles, New York have Immigrant and Refugee Affairs Offices, or what is sometimes called a New Americans Office. Other cities like Washington, D.C. have Latino Affairs Offices. Such offices advise mayors on immigration issues, analyze federal and state legislation affecting immigrants, inform the public about immigration policies, liaise between immigrant communities and city government, advocate on behalf of immigrant constituents, and publish multilingual literature on government services. To be effective, these offices need a broad and flexible mission to educate and assist immigrants, an appropriate budget, and a willingness to seek new ways of consensus

building among newcomers and long-term residents. Immigrant affairs offices should not be used as window dressing to appease ethnic community representatives or showcase a particular mayor or political party.

After experiencing new and rapid immigrant growth, some cities have established a time-limited commission mandated to study and speak on broad immigrant issues or a few particular matters of concern to the city council. Commissions, which may be the precursor of an immigrant affairs office, typically submit a report to the city council with recommendations.

Immigrant affairs offices or immigrant-focused commissions often prioritize the need for immigrant integration initiatives. Citizenship programs are often highlighted as a priority, based on a need expressed by immigrants. The state of California's Little Hoover Commission's report, *We the People: Helping Newcomers Become Californians* identified the need for naturalization promotion and assistance from federal, state, and local governments. The Santa Clara County Office on Human Relations Citizenship and Immigrant Services Program's Summit on Immigrant Needs and Contributions also prioritized citizenship services and funding for citizenship programs.

Despite the demand for citizenship, naturalization rates are going down in some cities. The Institute for Metropolitan Affairs at Roosevelt University in Chicago produced a report in June 2003 noting that the naturalization rates and English proficiency levels for immigrants had decreased from 1990 to 2000.¹ Following this report, the state of Illinois set up a Joint Legislative Taskforce on Immigrants and Refugees that held hearings in early 2004 and identified a lack of both accurate information about naturalization and resources to assist immigrants with the process.² As a result, the Illinois governor and legislature established a statewide New Americans Initiative, which is the country's most integrated citizenship program. More and more, city governments realize that citizenship programs produce life-changing results, strengthening families and forging strong community partnerships among native and foreign-born residents alike.

RECOMMENDATIONS:

Legislation and Policies:

- 1 Localities, in the absence of state laws, should pass consumer protection legislation against the unauthorized practice of law to protect low-income immigrants from the predatory practices of unqualified immigration counselors.
- 2 Localities should pass legislation to establish offices of immigrant affairs with a broad mission and sufficient budget.

- 3 City immigrant affairs offices should have advisory committees that include immigrants and a formal process to receive community input.
- 4 City governments should consider setting up commissions of civic leaders to identify strategies to promote immigrant integration, citizenship, and civic engagement.
- 5 City councils should review the option of granting noncitizens the right to vote as “citizens of the city” in local elections. Councils should consider whether giving noncitizens a voice in the local political process will encourage them to become U.S. citizens at a faster and higher rate.

Services:

- 6 City governments should survey immigrant populations on how they understand, perceive, and use city services.
- 7 Localities should ensure that their services are accessible to immigrants and should review their compliance with Title VI access requirements.
- 8 City governments should maintain parallel, multilingual websites to make their municipal services more readily available to immigrant populations.
- 9 City governments should translate guides to city services in frequently used immigrant languages.
- 10 City governments should publish and distribute directories of public and private organizations that serve specific immigrant needs, such as translation, interpretation, bilingual health screening, English language instruction, legal aid, and citizenship classes.
- 11 City governments, particularly through immigrant affairs offices, should sponsor clinics in which immigrants can receive a one-on-one consultation with a volunteer attorney on legal immigration matters.

Coordination of Services:

- 12 City governments should study the demographic profiles of their immigrant population to inform policy-making and service delivery. Research should identify numbers, source countries, residential settlement patterns, languages, socioeconomic attainment, education, labor force impact, naturalization rates, and voting rates.
- 13 City governments should help coordinate public school efforts to inform 17- to 18-year-old students about naturalization eligibility. Selective Service registration for males should be used as an opportunity to educate foreign-born male students about citizenship.
- 14 City governments should encourage program partnerships between public schools and libraries in providing English language instruction to adults and children.

- 15 City governments should encourage employers of significant numbers of immigrant workers to provide ESL and citizenship instruction in the workplace. Tax incentives should be provided to participating employers and grants to charitable organizations for this purpose.
- 16 City governments should encourage local refugee resettlement agencies to assist clients in becoming Lawful Permanent Residents and citizens. City officials should assist these agencies by identifying skilled volunteers to help applicants at workshops and to tutor applicants.
- 17 City offices for aging services should ensure that their programs address the citizenship needs of foreign-born elders, particularly refugees at risk of losing Supplemental Security Income benefits at the end of their seven-year eligibility limit.
- 18 City immigrant affairs offices should work closely with ethnic media outlets to increase immigrants’ knowledge of city officials, structures, services, and events of concern to immigrants.

Funding:

- 19 City governments should not prematurely withdraw or reduce local funding for citizenship services if federal funding increases; rather, they should coordinate a seamless transition as local organizations expand and secure their citizenship programs with federal, state, local, and philanthropic support.
- 20 City governments should use local funds to support citizenship services that federal funding may not cover, such as classes for specific ethnic and elderly populations, legal representation, naturalization oath ceremony events, voter registration, and civic engagement projects.
- 21 City councils should fund family literacy programs to reduce the literacy gap between school-aged children and their foreign-born parents.
- 22 City education departments should ensure that the U.S. history and civics curriculum for their adult basic education courses promotes U.S. citizenship status, its rights, and its responsibilities, and helps students study for the naturalization test. Alternatively, adult, ESL, and civics courses should have a citizenship component for students who wish to study for the naturalization test.

Immigrant Integration and Citizenship Promotion:

- 23 City governments should consult early with immigrant groups and service organizations when developing integration policies and strategies. Focus groups, public hearings, and a written comment process should be used to capture good ideas.

- 24 City governments should encourage naturalization among their foreign-born employees by providing information about local charitable immigration programs and distributing free citizenship materials.
- 25 City governments should encourage partnerships between public and private institutions to promote voter registration for new citizens.
- 26 City officials should mentor immigrant leaders to promote their greater civic engagement and participation in government.
- 27 City governments should convene community-based organizations to identify ways to involve immigrants in civic engagement and to prepare them for naturalization.
- 28 City government representatives should attend naturalization ceremonies and highlight the positive impact of immigrants on the community and the ways they contribute to civic life.
- 29 City officials should provide assistance to USCIS and charitable organizations in finding and securing appropriate venues for naturalization oath ceremonies.
- 30 City governments should convene public-private forums to promote the work of local organizations that provide naturalization and citizenship services.

- 1 Paral, R. and Norkewicz, M. *The Metro Chicago Immigration Fact Book* (Roosevelt University Institute for Metropolitan Affairs, June 2003).
- 2 Illinois Coalition for Immigrant and Refugee Rights. Report to the Illinois Department of Human Services on the New Americans Initiative (2005).

Public Libraries

Public libraries are a unique and vital institution in U.S. society. Libraries assume many roles and provide varied services to meet the public's need for learning. They are an open and welcoming community center that the American public supports, absorbing and reflecting many socioeconomic and cultural differences. Libraries can be found in almost all communities—metropolitan, suburban, and rural. They are free, often centrally located, and open extended hours, including evenings and weekends.

The nation's public library system is greatly indebted to the philanthropist, Andrew Carnegie. Starting in the late nineteenth century, Carnegie, and later Carnegie Corporation, spent \$56 million to establish 1,861 public libraries throughout the United States.¹ In 1926 the corporation focused its philanthropy on improving the library profession and helping libraries to become a central point of information and services. As a result, most communities in the United States are still receiving the benefits of a "Carnegie" library.

Immigrants use libraries like any other patron. They can find answers to most questions, from the practical to the theoretical, through library loan collections, reference materials, research archives, interlibrary loan services, and the librarian reference desk. Like other patrons, they also conduct research, complete schoolwork, read, listen to music, watch movies, retrieve tax forms, and attend community meetings.

Immigrants Need Access to the Internet

Libraries are increasingly important to low-income and limited English speaking immigrants who do not own or know how to operate a computer. Now that the United States Citizenship and Immigration Services (USCIS) requires immigrants to make their own scheduled appointments on-line, using a system called InfoPass, immigrants without home computers often go to libraries. Also, the increasing availability of online filing of immigration forms necessitates more computer accessibility. As a result, libraries are faced with a need to budget more funds and more staff time to help people transact personal affairs on the Internet and to update their websites with immigration-related information and links.

Through their services, libraries mainstream immigrants who are engaged in familiar, everyday activities, but are in an entirely new cultural setting and often dealing with a new language. Libraries continue to be gateways for immigrants seeking information about their new community and learning new skills. As the numbers of immigrants increase, libraries are modifying budgets, material collections, programs, and staffing to adapt to immigrant patrons without displacing traditional ones.²

Library services help immigrants access information and build skills to navigate the complexities of life in a new country. These services include: non-English books and magazines with information about their home country; English as a second language (ESL) classes; literacy training in English for multigenerational family members; space for native language training for children with parents who speak a first language other than English; homework tutoring for ESL, school age students; information about government functions and services; reference desk help for information normally acquired through long-term acculturation; computer classes; and citizenship classes on English, history, and civics for the naturalization exam.

The Queens Borough Public Library in New York City is one striking example of how a library is changed by its foreign-born customers. The library serves one of the most diverse communities in the country. Queens has residents

representing 160 nationalities. One-third of residents are foreign-born.³ The library's New Americans Program (NAP), established in 1977, provides speakers of non-English languages a wide array of services. These include non-English books and publications; on-line directories of non-English newspapers; mail-a-book services for home-bound, non-English readers; cultural integration workshops; library-based ESL classes; an on-line book club that sends short English reading selections by e-mail; and referral lists for English classes, citizenship classes, and charitable legal immigration services. All these services are listed on the library's well-organized website.

The Jones Library in Amherst, Mass., represents a small community with a proportionately small immigrant population. Nonetheless, the Jones Library has an ESL center. Currently, Lynne Weintraub⁴, a noted author of citizenship instruction materials, staffs the center on a part-time basis. The center offers intermediate level English instruction, one-to-one volunteer ESL tutoring at all levels, and a citizenship class, which is conducted in ten sessions that are one and one-half hours each. Weintraub explains naturalization eligibility, distributes and helps students complete the Application for Naturalization (N-400), explains the naturalization process in detail, refers people to English classes, assigns volunteer tutors, and even makes case inquiries with the United States Citizenship and Immigration Services (USCIS) and helps low-income applicants complete fee waiver requests for the naturalization application fee. Weintraub reports a 100 percent pass rate for her students taking the naturalization exam.⁵

The Columbus Metropolitan Library's Hilltop Branch in Columbus, Ohio, exemplifies how a library system can respond to a quick rise in a city's immigrant population. In the 1990s the number of immigrants in Columbus particularly Somalis and Latinos, increased significantly. One low estimate of the Somali population is around 25,000. As a result, Hilltop and other Columbus library branches in immigrant-impacted neighborhoods have greatly expanded and changed their services.

Hilltop hosts six ESL classes per week in partnership with the Columbus Literacy Council. Importantly, the literacy council does not ask for documentation. The library also hosts "Homes on the Hill," home ownership classes led by a Latino service organization. It partners with a nonprofit organization to provide General Equivalency Degree (GED) and adult basic literacy classes two times per week. Hilltop's manager meets bimonthly with the county's Department of Jobs and Family Services to connect the library's ESL classes to job training. As has been shown in other resettlement cities populated by Somali refugees, immigrants with limited English and little formal education need English to improve their job market skills.⁶ In addition to questions about employment, immigrant

patrons often ask the reference librarian for referrals to free or sliding-scale health care services and legal immigration representation.

In 2004 Hilltop created a new literacy liaison library position with a Spanish-language proficiency requirement. The liaison distributes books and flyers at Latino groceries and reads English and Spanish stories to children whose parents shop at a "free" store sponsored by an interfaith coalition. The liaison draws limited English speakers to Hilltop's expanding collection of English materials for those who speak a second language and non-English books, newspapers, and periodicals.

Recently, Hilltop hosted a very popular citizenship class in collaboration with the Columbus Literacy Council. The class ended when funding from the State Library of Ohio stopped. Although space limitations posed a challenge, Hilltop's manager hopes that the library will resume the citizenship class because of its importance and popularity. The council continues to offer one free class elsewhere, but demand is so high that it could offer multiple citizenship classes at a time, if money were available.⁷

While many excellent examples exist in large and small communities, more needs to be done for libraries to be a focal point for immigrant citizenship and integration services. Many suburban and rural communities have experienced an increase in the number of immigrants, but lack community-based organizations to help serve them. A national citizenship program reaching immigrant-impacted communities across the country would greatly benefit from the utility of libraries and the spirit of assistance common to library staff, but it would require funding to support the best locally devised plans and partnerships.

Conscious of these issues, the Department of Homeland Security's Office of Citizenship (OoC) held a meeting on October 26 and 27, 2004 at the Harold Washington Library Center in downtown Chicago with people from across the country, including library staff, community-based organization staff, and ESL teachers. The purpose of the meeting was to share information about how immigrants use libraries, particularly for their integration and citizenship needs. Since then, the OoC has been seeking to involve the national leadership of library and literacy organizations in bringing proven practices to scale and trying innovative ideas. In March 2006, the OoC released a report entitled "*Library Services for Immigrants: A Report on Current Practice.*"

To promote citizenship and provide naturalization services, libraries can: disseminate posters and flyers created by the OoC and local immigration service organizations, have current Application for Naturalization (N-400) forms and support documents describing the naturalization process, keep reference desk staff informed of the fundamentals of

naturalization requirements and procedures, keep a list of charitable immigration service organizations providing direct legal representation and education, offer space for naturalization classes and naturalization application workshops, and recruit professionals and trained volunteers to provide literacy instruction for passing the naturalization exam. The list of possible services and community partnerships is extensive because of the common missions of libraries and community organizations that serve immigrants.

RECOMMENDATIONS:

Planning for Immigrant Integration Services:

- 1 Local public libraries should establish a working committee to make policy, budget, and program recommendations to better serve foreign-born library users, while fitting these recommendations for long-term, institutional support into the mission of the library.
- 2 Local public libraries should use the growth in the immigrant population and its demand for services as leverage in receiving additional public funds. They should develop budgets with a line item dedicated to immigrant integration needs, as defined by the community and supported by state and local funding. The budget for immigrant integration should be proportional to the percentage of the population that requires the services and should not be based on the number of immigrants using library resources, since systemic barriers for immigrants might currently exist.
- 3 Local public libraries should seek foreign-born board members interested in helping libraries serve immigrant communities better and solicit more programmatic and material support from immigrant communities for library services.
- 4 Local libraries in partnership with immigrant community groups should identify local allies who can serve as volunteer teachers, tutors, grant writers, and fundraisers, or as donors of money and materials, for library-based immigrant integration services. Civic associations not commonly identified as immigrant-focused should be invited to learn how important libraries are to immigrants, particularly new or low-income immigrants.
- 5 Local public libraries should conduct listening sessions with foreign-born library users, English teachers, immigration advocates, refugee resettlement agencies, and ethnic-based community organizations to be better informed when making policy, budget, and program recommendations.
- 6 Local public libraries should have an ongoing or annual evaluation to receive feedback from foreign-born library users.
- 7 Local public libraries should have multilingual comment sheets clearly visible to visitors in order to solicit input that may be unspoken in a public listening session. Questions should be both fixed and open-ended to ensure that people from cultures with different comfort levels for providing input or criticism are heard.

Immigrant Integration Services:

- 8 Local public libraries in immigrant-impacted communities should assess the need for, and hire, bilingual and multilingual librarians who can help design library shelves, kiosks, programs, and outreach messages to better serve foreign-born library users.
- 9 Local public libraries should have a written policy that supports the purchasing of English and non-English collections—novels, short stories, reference materials, dictionaries, magazines, newspapers, consumer guides, CDs, DVDs, audiotapes, and computer-based academic programs—targeting different immigrant populations in the community and reflecting their expressed reading interests and learning needs.
- 10 Local public libraries should maintain a supply of community service guides for distribution to newcomers, foreign or native-born, to increase their access to information that facilitates integration. The guide should also be available on-line. If no guide exists, library staff should call on local government and social service leaders to develop one, both in English and translated.
- 11 Local public libraries should stock their collections appropriately for a wide variety of ages and English levels by consulting, if necessary, with ESL experts.
- 12 Local public libraries should stock their collections based on immigrant integration needs and the needs of persons who serve immigrants professionally, such as teachers, social workers, community organizers, and religious leaders.
- 13 Local public libraries seeking to stock materials promoting immigrant integration should include information on: local city government services, local history, English language development, parenting, health care and wellness activities, employment search strategies, higher educational opportunities, immigration law, citizenship requirements, voting, and volunteer opportunities.
- 14 Local public libraries should stock shelves and kiosks with citizenship materials and encourage partnerships between librarians, ESL and civics teachers, and charitable, legal immigration practitioners.
- 15 Local public libraries, in cooperation with refugee resettlement agencies, should have regularly scheduled orientation tours, particularly in communities experiencing a steady stream of new arrivals. Orientation should focus on the interests of adults, school-age children, and parents helping their children's literacy and educational progress.

- 16 Local public libraries should regularly schedule family-based literacy classes, off-site if necessary, to increase English literacy at levels appropriate for people of different generations and educational backgrounds.
- 17 Local public libraries should develop after-school programs that offer the children of immigrants who work long hours an alternative to latch-key arrangements. After-school programs need to be designed with schools and solicit parent input to ensure their support and keep the programs purposeful and orderly.
- 18 Local public libraries should offer English conversation circles bringing native and ESL speakers together. Circles offer limited English speakers an opportunity to practice their vocabulary, syntax, and pronunciation and form bridges between people of different backgrounds.

Immigrant Citizenship Services:

- 19 Local public libraries, especially those with strong or developing citizenship programs, should ask the American Library Association (ALA) to develop a partnership with the OoC for program design ideas and tools, based on best practices listed in the OoC report *Library Services for Immigrants: A Report on Current Practice*.
- 20 In collaboration with charitable legal immigration programs and literacy councils, local public libraries should assemble up-to-date citizenship application packets that include an Application for Naturalization (N-400), information about the naturalization process written for limited English readers, and self-study materials for more proficient readers. The packets should include the date of the information's validity and note the importance of obtaining professional legal counsel.
- 21 Local public libraries should hold citizenship test preparation classes in partnership with community-based organizations experienced in naturalization law and testing. Libraries are perceived as a neutral place that is not designated for social services or for a particular ethnic or immigrant group, thus attracting many people.
- 22 Local public libraries with ample space should host community meetings on immigration law and naturalization application workshops in partnership with community-based legal immigration programs. They should reconsider policies opposing advertising or requiring free entry to meetings because community-based organizations that host application workshops charge a nominal fee for their professional services.
- 23 Local public libraries should maintain an ample bank of modern computers that offer Internet capability and extended use periods. USCIS requires immigrants to make appointments using its heavily trafficked on-line InfoPass service, which often necessitates many attempts. Also, USCIS plans to allow more immigration applications to be filed on-line.

- 24 Local public libraries should create portals on their website with up-to-date information about English language assistance and citizenship information. The website should have useful links to OoC and local charitable immigration programs.

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- 1 Carnegie Corporation of New York. "A Short History of Carnegie Corporation's Library Program," available at: <http://www.carnegie.org/reporter/07/library/shorthistory.html>
 - 2 Barr, C. W. "Rewriting Book on Libraries from Immigrants' View" *The Washington Post* (February 5, 2006), p. C01.
 - 3 Queens Library. "About this Program," available at: <http://www.queens.lib.ny.us/programs/nap/aboutnap.asp>
 - 4 Lynne Weintraub is a participant in CLINIC's ESL/Citizenship Instruction Working Group for research on this report. She has contributed to this report by conducting interviews and writing sections of Chapter 7. The Massachusetts Literacy Foundation recognized Lynne Weintraub as a 2005 Literacy Champion for her work in adult education and English for speakers of other languages.
 - 5 Interview with Lynne Weintraub conducted by the report's authors on March 9, 2005.
 - 6 Fahrenthold, D. A. "English Key to Jobs for Somalis, City Says" *The Washington Post* (February 28, 2006), p. A03.
 - 7 Interview with Leroy Bokai conducted by the report's authors on March 2, 2006.

Philanthropic Foundations

Philanthropic foundations in the United States are a major social force in creating a higher quality of life for people with unmet needs in a society with great disparities. To reduce inequities and build a better community, philanthropic foundations distribute vast funds every year to charitable organizations with shared missions. While philanthropic foundations support many cultural, educational, and scientific causes, foundations that focus their wealth and influence on the needs of the poor and marginalized play a particularly vital civic role.

Foundations are not alone in reducing the strains of life often experienced by underprivileged people. Houses of worship, civic voluntary associations, and government share in this effort. Yet foundations offer a particularly powerful nexus of money, persuasion, innovative ideas, and partnerships to effect positive social change. They can also successfully leverage other funds to match their contributions, thereby increasing and diversifying the monies available to nonprofit organizations.

Without the aid of philanthropic foundations, charitable organizations' capacity to serve would be greatly diminished. The constant demands on religious institutions to do more, the rising and falling of public tax dollars, and polit-

ical or ideological conflicts in government discourse over how best to aid the poor make foundation dollars all the more important.

Some immigrants directly benefit from foundation support of charities that serve them based on their low income, limited education, narrow employment skills, health care concerns, and social service and other integration needs. The majority of immigrants, who are not poor, are still affected because they have family members or friends who have received these services or they simply live in a largely immigrant community that benefits collectively. The shared work of foundations and community service organizations visibly exemplifies good will toward immigrants who may come from societies that are underdeveloped or that are severely restricted socially or politically and restrain such charitable activities.

Large and well-endowed foundations have traditionally taken the lead in addressing the challenges that immigrants present on a national scale. In recent years, more regional and local foundations have identified immigrants and integration activities as a priority for funding, due to an array of factors: a historically high rate of legal immigration in the 1990s, a rising percentage of the foreign-born in the population total, the growing diversity of immigrants, record numbers of undocumented and vulnerable migrants, the special needs of refugees as persecuted people, new federal and state welfare laws pushing poor immigrants deeper into poverty, and the strong desire of immigrants to become U.S. citizens and participate in the nation's democratic system.

Foundations interested in promoting the well-being of immigrants fund activities involving demographic, social, and policy research; publications; conferences; professional development training; direct human services; advocacy and community organizing; English and civics classes; citizenship outreach; and naturalization application assistance. Traditionally, foundations funded charitable organizations individually and directly. Now, a widening group has begun to pool funds, sometimes through a new grant-making entity, to support large initiatives involving national, local, and regional collaborations. Examples include the Grant Makers Concerned with Immigrants and Refugees (GCIR) and Four Freedoms Fund.

In recent years, noteworthy foundation funding for naturalization and immigrant civic engagement has resulted in increased knowledge and skill among nonprofit organizations in promoting immigrant integration. A few have been groundbreaking for their size, purpose, and impact.

In 1995 the Ford Foundation provided \$135,000 in funding to the Catholic Legal Immigration Network, Inc. in support of nine diocesan immigration programs in five states that helped naturalize approximately 20,000 people through

478 citizenship application workshops. It is one of the earliest examples of a multisite, large-scale citizenship initiative since the reform and expansion of immigration laws in 1965. In 1996 the James Irvine Foundation launched a seven-year, \$13 million project called the Central Valley Partnership (CVP) for Citizenship, targeting tens of thousands of immigrant farm laborers living and working in rural California. The CVP project is notable for assisting more than 10,000 immigrants—predominately low-income, limited English speaking agricultural workers from Mexico and Southeast Asia—to file citizenship applications.

Welfare reform in 1996 propelled the most ambitious and productive citizenship project in the nation's modern history. The Open Society Institute, in early 1997, established the \$50 million Emma Lazarus Fund (ELF) to support a diverse array of national networks and stand-alone immigration and social welfare programs to naturalize people who were at risk of losing public benefits without citizenship status. An estimated 500,000 immigrants were assisted in the naturalization process through ELF.

A final example of a national citizenship initiative funded solely by private philanthropy is the James L. Knight Foundation's American Dream Fund. This two-year-old fund started in 2005 with \$6 million awarded to 29 local and state organizations in 14 communities where the foundation has a presence. Naturalization results of the American Dream Fund's first year will be known in late 2006.

One challenge of obtaining funding from foundations is their tendency to perceive naturalization programs as a black hole, based on persistent backlogs and bureaucratic obstacles. Another challenge is the view that naturalization services were the compelling issue in the 1990's but not today. While civic engagement is now a popular issue for immigrant funding, the focus is on organizing immigrants, with little attention to naturalization. Comprehensive naturalization services should be equally important to civic engagement activities in funding decisions. Foundations should resist funder fatigue and the urge to constantly fund new and unique projects to make their giving stand out. They need to provide multiyear funding and to leverage other sustainable funders in order to produce creative and lasting organizational partnerships and ever-rising naturalization rates.

Foundations are essential partners with nonprofit and charitable organizations assisting immigrants. They will continue to play an important role in promoting naturalization and civic engagement activities for the foreign-born, even if a national citizen program is implemented and funded. With greater public and private cooperation, more successful immigration and immigrant integration policies

will be developed and put into practice. In the process, the nation's immigrant heritage will be affirmed and immigrant contributions will continue to enrich the nation.

Foundation-Funded Research

Foundations have funded important research on immigrant demographics, rates of immigration, characteristics of immigrants, relocation preferences, language and professional skills, and naturalization rates. These reports help determine advocacy and service delivery priorities. Other research on immigration policy and programs provides knowledge of what works, what does not work, and why. A short, select list of foundation-supported documents on naturalization and immigrant integration follows.

Naturalization and Citizenship:

The Long Grey Welcome: A Study of the American Naturalization Program, David S. North, National Association of Latino Elected and Appointed Officials' Education Fund, 1985, supported by the Ford Foundation.

Democracy on Hold: How the Citizenship Process is Failing Immigrants and Our Nation, Margery Colten, Citizenship Now Coalition, 1998, supported by the Open Society Institute.

Citizenship at Risk: New Obstacles to Naturalization, Laurie Joyce, Jeff Chenoweth, and Laura Burdick, Catholic Legal Immigration Network, Inc., 2000, supported by the Ford Foundation and the Carnegie Corporation of New York.

We the People: Proposed Citizenship Project, Tamar Jacoby (Manhattan Institute) and Frank Sharry (National Immigration Forum), May, 2003, funded by The Pew Charitable Trusts.

Trends in Naturalization, Brief No. 3, Michael Fix, Jeffrey S. Passel, & Kenneth Sucher, Urban Institute, September 2003, supported by the Annie E. Casey Foundation, the Pew Charitable Trusts, and the National Institute for Child Health and Human Development.

Citizenship for Us: A Handbook on Naturalization and Citizenship, 4th Edition, Aliza Becker, Laura Burdick, and Jeff Chenoweth, Catholic Legal Immigration Network, Inc., 2006, supported by the Carnegie Corporation of New York with earlier editions supported by the Department of Health and Human Services/Office of Refugee Resettlement.

Citizenship and Civic Engagement:

Supporting English Language Acquisition: Opportunities for Foundations to Strengthen the Social and Economic Well-Being of Immigrant Families, Tia Elena Martinez and Ted Wang, Grantmakers Concerned with Immigrants and Refugees, 2005, supported by the Annie E. Casey Foundation.

Immigrant Integration & Intergroup Relations: New Directions for a New Century, Dick Kirschten, National Immigration Forum, December, 1999.

Now That I'm Here: What America's Immigrants Have to Say About Life in the U.S. Today, Steve Farkas, Ann Duffett, & Jean Johnson, Public Agenda, 2003, supported by the Carnegie Corporation of New York.

Inspiring Leadership in Immigrant Communities, Lutheran Immigration and Refugee Service and the Immigrant Legal Resource Center, 2003, supported by the Open Society Institute.

Immigrant-Led Organizers in Their Own Voices: Local Realities and Shared Visions, Sibora Gjecovi, Esther James, and Jeff Chenoweth, Catholic Legal Immigration Network, Inc., 2006, supported by the Carnegie Corporation of New York.

RECOMMENDATIONS:

Funding Perspectives:

- 1 Foundations need to look holistically at the immigration experience and support immigrant integration at various stages to encourage and prepare immigrants for citizenship.
- 2 Foundations need to fund naturalization services, regardless of the persistent problems in the federal government's naturalization processes such as backlogs, lengthy waits for appointments, and rising fees.
- 3 Foundations should use their flexibility to fund immigrant civic engagement opportunities not likely to be funded by the federal government prior to, during, and after the naturalization process, to compliment government-funded activities.
- 4 Foundations need to establish a funding category for charitable legal services, which do not fit under traditional foundation funding categories.
- 5 Foundations need to mirror naturalization funding with the steady increase of newly arriving immigrants and not ignore immigrant service organizations just because immigration is a constant phenomenon. Funders should use a cross-foundational approach to match federal support.

- 6 Foundations experienced with immigration concerns need to help other foundations, particularly in new gateway communities, by sharing lessons learned to enable them to draw on programs with proven results.
- 7 If a national citizenship program is implemented, foundation support should promote the inclusion of immigrants, particularly at the local level where services are delivered.
- 8 Foundations need to consider legal, language, and test preparation services for naturalization as important as civic engagement activities and fund both equally.
- 9 Foundations should fund naturalization services in combination with civic engagement activities wherever the model fits local abilities, interests, and realities.

Funding Options:

- 10 Before a national citizenship program is implemented, foundations should collaborate with charitable organizations to create multimillion dollar naturalization projects that follow best practices in strategic cities and regions, foreshadowing what a national citizenship program could do if grown to scale.
- 11 Foundations should renew funding for state immigration coalitions and national immigration networks that are pursuing immigrant integration and citizenship projects.
- 12 Foundations should fund large, national networks that can provide training and technical support and leverage more funds. If national networks are not present, foundations should support local efforts directly, ultimately expanding coalition-building efforts.
- 13 Foundations should take the lead in funding research that seeks to answer important questions about immigrants, their approach to citizenship, and the outcomes of citizenship. A list of critical research questions are identified in this report. (See “Research Institutions” in this chapter.) For example, what are the priorities of naturalization for immigrants in general and according to demographic groupings? Are naturalized immigrants more civically engaged than immigrants who are not naturalized? Conversely, does civic engagement among immigrants result in faster and higher naturalization rates?
- 14 Foundations should fund citizenship-related services like English and civics instruction in ways unsupported by public dollars to demonstrate how more federal funds are needed to fulfill the federal government’s responsibility to immigrants and the communities in which they live.
- 15 Foundations should fund technical assistance for citizenship program models to identify, evaluate, and promote best practices, replication, and accountability.
- 16 Foundations should fund adult learning curricula in classes for immigrants in the naturalization process to

make the experience of becoming a citizen more meaningful, memorable, and rich in learning opportunities.

- 17 If a national citizenship program is implemented, foundations should fund complimentary messages on citizenship promotion and civic engagement.
- 18 Foundations should fund multisector partnerships and unorthodox alliances that government cannot support because of public funding restrictions.
- 19 Foundations should fund multimedia citizenship promotional materials including documentaries on the naturalization process and oath ceremony, web-based curricula that is interactive and explores issues beyond the content of the naturalization test, and instructional videos on the U.S. government and institutions, civic history, and other issues relevant to immigrants.
- 20 Foundations should fund experienced practitioners as well as professional researchers to publish articles in academic and specialist journals on immigrant integration and citizenship participation.
- 21 Foundations need to fund advocacy groups that lobby legislatures and federal immigration officials to improve immigrant customer services and include private groups in discussions on immigration policy. Important advocacy efforts should focus on sustainable funding, backlog reduction, naturalization testing content and methodologies, alternatives to testing, disability issues, and concerns about immigrant access to information.

Funding Capacity Building:

- 22 Foundations should help fund a full-time staff person dedicated to citizenship and immigrant integration policies at each national immigration network and state immigration coalition.
- 23 Foundations should provide capacity-building funding for ethnic-based community organizations to become recognized agencies by the Board of Immigration Appeals in order to expand the availability of qualified, charitable legal immigration services and avoid the risk of being charged with the unauthorized practice of law.
- 24 Foundations need to take the lead in funding immigrant integration strategies and programs in response to a laissez-faire federal policy.
- 25 Foundations with experience in funding naturalization programs should link other foundations with charitable immigration experts who can educate them on the benefits of citizenship, the naturalization process, barriers, and services that best help immigrants succeed in becoming citizens.
- 26 Foundations need to respond affirmatively to any significant increase in public funding for citizenship by leveraging philanthropic and corporate support.
- 27 Foundations need to hold seminars and forums to encourage businesses to offer employee compensation

to immigrants for time dedicated to learning English and other job skills that benefit the employer.

- 28 Foundations should fund roundtables and conferences on naturalization policies, advocacy training, and program replication strategies.
- 29 Foundations should feature nationalization stories and issues on their websites, as a way to attract other foundations and encourage their participation in promoting immigrant integration and citizenship.

Funding Partnerships:

- 30 Funders should support vertically and horizontally integrated collaborations functioning under a national citizenship program to ensure uniformity in standards, training, information sharing, and leadership development.
- 31 Foundations need to help private organizations link naturalization programs to programs promoting voter education, registration, and participation.
- 32 Foundations need to join federal, state, and local authorities and private sector groups in jointly considering the approaches and infrastructure of a national citizenship plan before significant federal funds are available to launch the initiative. Foundations should convey the importance of experienced national and local networks promoting citizenship and delivering naturalization services and language instruction.
- 33 Foundations dedicated to immigrant integration and citizenship in the United States and abroad can bring charitable organizations together internationally, one-on-one or in small groups, to share successful citizenship and immigrant integration models.
- 34 Foundations should fund forums and projects that bring academics, policy makers, and practitioners together, helping bridge the divide between these groups that share similar missions to help immigrants integrate and society to be more welcoming.

Research Institutions

The United States needs more research in the field of immigration. With immigration numbers at historic highs, significant diversity in the source of immigrants, and the globalization of ordinary people's personal and professional relations, the country faces a host of new questions about immigrant incorporation. More dialogue and collaboration between researchers, policy makers, and practitioners is also critical.

Topics for immigration research are plentiful. A short list includes: immigrant destinations and residential preferences, unauthorized migration rates and patterns, socioeconomic characteristics, impact on national and local economies, use of social welfare benefits, transnational

behaviors, intergenerational family relations, language acquisition, educational attainment, religious beliefs and practices, political activity, refugees, human rights, and human trafficking.

Institutions engaged in immigration research are varied. Federal, state, and local governments conduct or commission research, including the U.S. Census Bureau, U.S. Citizenship and Immigration Service's Office of Immigration Statistics, and the Department of Human Services' Office of Refugee Resettlement. Data on immigrants is also collected by departments like the Bureau of Labor Statistics and the Department of Education in the context of their particular missions. Important intergovernmental organizations, such as the Organization for Economic Cooperation and Development (OECD) and the Office of the UN High Commissioner for Refugees, provide data on the global flow of migrants and refugees and help place the U.S. experience in context.

In addition to government or intergovernmental institutions, a variety of nonprofit think tanks address immigration issues, including: Urban Institute, Brookings Institution, Migration Policy Institute, Center for Migration

International Migration Review Articles on Naturalization, Citizenship and Immigrant Integration in the United States

Determinants of English Proficiency Among Mexican Migrants to the United States, Kristin E. Espinosa and Douglas S. Massey, Vol. 31, Spring 1997, p. 28-50.

Immigrant Adaptation and Native Born Responses in the Making of Americans (Special Issue with 11 articles), edited by Josh DeWind, Charles Hirschman, and Philip Kasinitz, Vol. 31, Winter 1997.

All Under One Roof: Mixed Status Families in an Era of Reform, Michael Fix and Wendy Zimmerman, Vol. 35, Summer 2001, p. 397-419.

Under Two Flags: Dual Nationality in Latin America and Its Consequences for the United States, Michael Jones-Correa, Vol. 35, Winter 2001, p. 997-1029.

Testing the Effects of Collectively Expected Durations of Migration: The Naturalization of Mexicans and Cubans, Benigno E. Aguirre and Regelio Saenz, Vol. 36, Spring 2002, p. 103-124.

The North American Naturalization Gap: An Institutional Approach to Citizenship Acquisition in the United States and Canada, Irene Bloemraad, Vol. 36, Spring 2002, p. 193-228.

Studies, Research Institute on Social and Economic Policy, Manhattan Institute, Cato Institute, and Center for Immigration Studies.

Also pursuing immigrant research are university social science departments, including sociology, demography, urban studies, ethnic studies, political science, history, and economics. Schools of education, public policy, social work, and law contribute scholarship as well. A selection of universities with departments or centers conducting research includes: Georgetown University's Institute for the Study of International Migration; University of Minnesota's Immigration History Research Center; University of Houston's Center for Immigration Research; University of California, San Diego's Center for Comparative Immigration Studies; University of California, Irvine's Center for Research on Immigration, Population and Public Policy; and Harvard University's Graduate School of Education's Immigration Project. Some universities offer concentrations in immigration within certain degree majors. An increasing number are encouraging crossdisciplinary perspectives on immigration as the field becomes more complex and dynamic.

Many venues are used to share research. Open events like seminars, conferences, symposia, briefings, and roundtables promote face-to-face dialogue and the exchange of opinions and ideas. Websites offering immigration data,

The New Immigrant Survey

In the first effort of its kind, the New Immigrant Survey (NIS) seeks to inform immigration law, policy, and practice with survey data from nationally representative, longitudinal studies of new legal immigrants and their children in the United States. A pilot panel survey was conducted in 1996. A larger study was conducted in 2003. A third phase of the longitudinal study is planned for early 2007. The data sets provide new and more meaningful information about immigrant cohorts from a human development perspective. Without a longitudinal study, researchers can only suggest who naturalizes and who does not at certain points in time. With longitudinal data, naturalization outcomes and patterns can be known for large cohorts. Relevant survey questions for a national citizenship plan include: expected length of stay in the United States, degree of comfort with the English language, and intention to become a U.S. citizen. Each is analyzed by visa category, employment status, educational level, family composition, and other key demographic data. (Principal NIS investigators are Guillermina Jasso, New York University; Douglas S. Massey, Princeton University; Mark R. Rosenzweig, Yale University; and James P. Smith, RAND Corporation.)

which have proliferated in recent years, make information more accessible to other academics and the general public and expand a research institution's visibility. They do not necessarily promote an easy exchange between interested people.

Publications are the traditional method for most research institutions to convey their findings. One quarterly, *International Migration Review*, is notable for its scope and attention to naturalization, citizenship, and immigrant integration. The review is a peer-reviewed journal managed by an editorial board under the auspices of the Center for Migration Studies, a nonprofit organization founded in 1964, and in cooperation with the United States Conference of Catholic Bishops' Migration and Refugee Services department. Over the past 30 years, the *International Migration Review* has published important articles on U.S. naturalization, citizenship, and immigrant integration.

Overview of Research Recommendations

By Michael Fix

Vice President and Director of Studies
Migration Policy Institute

The research agenda by CLINIC that follows represents an extraordinarily thoughtful compendium of study issues that spans the disciplines and requires research strategies ranging from survey research, analysis of the Census, implementation and evaluation research, and test design, to international comparative work.

The reader is immediately struck by the breadth and importance of the agenda, and—by implication—by the limited amount of ongoing work in this critical field and by the equally few resources that are expended on it, not just in the area of programs but in needed basic information. This limited knowledge base is made even more notable by the fact that citizenship is more important now than at any point in recent U.S. history as access to the social safety net and to fundamental rights, including access to residential security, now turn on it. Moreover, as this report indicates, the naturalization process is in flux as the citizenship test is being redesigned and proposals for comprehensive immigration reform would substantially increase legal immigration and, by extension, the number of newcomers eligible for naturalization. Current proposals also offer potential new sources of funding for English and civics classes.

Among the critical issues raised here include:

- The number, characteristics, and state distribution of immigrants eligible to naturalize;

- The need to map resources for language and civics learning at the local level;
- Assessing the internet and other “on demand” learning opportunities versus classroom-based instruction;
- Determining the relationship between local rates of naturalization and administrative practices on the part of community-based organizations and local Department of Homeland Security offices; and
- Pre- and post-naturalization rates of benefit use and civic engagement.

The agenda points up, in turn, the need not just for local institutional capacity but also for national institutions that can serve as catalysts, gatekeepers, and clearinghouses for the kind of information that would be generated—even if only a portion of the agenda were to be implemented. It further points up the need for monitoring ongoing research and practice in this field.

But the agenda as presented begs a number of questions that will need to be sorted out—perhaps in future work:

- How should we rank these questions in terms of their importance: the feasibility with which we can obtain results, the costs of the research entailed, and the validity of the results? Which studies can be carried out with existing data sets—in particular the Census and the New Immigrant Survey, and even the National Assessment of Adult Literacy—and which require expensive new survey work?
- What current work is being done within the academy and within governments that addresses the questions? Who is supporting it? When are results due to be released? What data sets are being used?
- An emphasis may need to emerge on the need for a careful, science-based assessment of the validity, reliability, and fairness of changes in the citizenship test now being developed by the U.S. Citizenship and Immigration Service (USCIS). This analysis will have to build on the work of the National Academy of Sciences panel and involve experts in the complex area of testing and assessment.
- The proposed work will also need to tackle head on developing a better understanding of the failure rates for the naturalization tests, how they change over time, and the reasons why. Good data in this area have been hard to come by.

Generally, we recommend the following in order to leverage immigration research to improve American policy and the practice of helping immigrants and refugees:

- Increase funding to study new questions of immigrant integration and citizenship, or to better study old questions that have not been adequately answered, in order to increase our knowledge of immigrant integration and citizenship;
- Increase collaboration between researchers outside government and those working inside government so that outside researchers can access governmental data, and government researchers can be brought up to date on outside research;
- Establish a national consortia to bring researchers in government, policy institutes, community organizations, and academia into regular contact with each other. One model might be the Canadian Metropolis project or the international Metropolis initiative, in which the United States has largely been absent.

RECOMMENDATIONS:

Research on Preparation for, and Successful Completion of, Naturalization:

- 1 Researchers should study the reasons why naturalized immigrants chose to become citizens and rank them according to preference by different population characteristics. Researchers should similarly study the reasons why non-naturalized immigrants want to become citizens or do not want to.
- 2 Researchers should survey non-naturalized immigrants, identifying the relative importance of barriers that impede eligibility, filing an application, and successfully acquiring citizenship status.
- 3 Researchers in academia and USCIS should use the Application for Naturalization to its fullest to identify correlations between nationality, ethnicity, gender, age, employment, length of residence, and other socio-demographic variables, on the one hand, and success with the application process, interview, and exam, on the other.
- 4 Researchers should focus studies on reasons why specific nationalities naturalize at lower rates than others to inform citizenship programs how to best message and deliver their services.
- 5 Researchers should continue to update the Urban Institute’s original September 2003 report, *Immigrant Families and Workers: Trends in Naturalization*, to keep interested groups informed on the concentration and dispersion of immigrants eligible to naturalize and socioeconomic characteristics facilitating or impeding their naturalization. Parallel studies should be conducted by states.

- 6 Researchers should study why refugees naturalize 1.5 times more than other immigrant categories as identified by the 2003 Urban Institute report on naturalization trends. Is the increase due to targeted naturalization services to refugees or to refugee proclivity to naturalize?
- 7 Researchers should design pre- and post-tests to be used in conjunction with a national citizenship curriculum by teachers of English as a second language and civics classes to evaluate student learning.
- 8 Researchers should study the effectiveness of naturalization outreach, application assistance, and test preparation classes for passing the naturalization interview and exam. Do similar immigrants who receive services have higher success rates than those applicants who do not?
- 9 Researchers should design a test to study how effectively current Department of Education English and civics training prepares immigrants to pass the naturalization test.
- 10 Researchers should study differences in immigrant student learning and outcomes between adult public schools, community colleges, and community-based organizations teaching English, civics, and naturalization test preparation courses.
- 11 Researchers should study what immigrants do in terms of learning habits and styles between failing the first naturalization interview or test and passing the second attempt.
- 12 Researchers should survey naturalized and non-naturalized immigrants on how they acquire information about naturalization eligibility and services to see which modes of dissemination are most utilized and most accurate, including Internet, family and friends, radio, television, magazines and newspapers, community-based organizations, and private attorneys.
- 13 Researchers should study whether citizenship status is best promoted through an education model or a legal service model. Are immigrants more likely to file naturalization applications with a public campaign on learning English, history, and civics or through messages on how the naturalization process works and the assistance available?
- 14 Researchers should test various citizenship marketing messages used to attract new applicants to determine what messages work. Which messages resonate for all immigrants, and which work best for specific ethnic or language groups?
- 15 Researchers should research the types of Internet information about naturalization and the accuracy and thoroughness of the information in order to identify strengths and weakness in Internet information dissemination.

- 16 Researchers should study what persons (by name or category) are likely to be the most desirable messengers of citizenship promotion in English and non-English media.
- 17 Researchers should study ways adult, limited English speakers best learn naturalization and civics information with an interactive experience on the Internet or compact discs.
- 18 Researchers should study if civic engagement among Lawful Permanent Residents results in higher naturalization rates.
- 19 Researchers should study the naturalization process as one of social ties. How are immigrants drawn into the naturalization process? Researchers should examine connections between individuals and organizations, family, friends, teachers, and places of worship. The same social approach can identify ways government helps and hinders the naturalization process.
- 20 Researchers should study the ability of elderly immigrants, especially those with lower educational levels in their native country, to learn English.
- 21 Researchers should study the impact of fee increases on the naturalization rate to see if higher fees are a deterrent and study the availability of fee waivers to see if low-income applicants have equal access to naturalization.

Research on the Consequence of Acquiring Citizenship:

- 22 Researchers should quantify citizenship benefits and conduct research that marks the economic and social differences between citizens and noncitizens.
- 23 Researchers should study the economic benefits of gaining citizenship status in terms of job advancement, job stability, and salary increases resulting in a higher quality of living for families, including owning a home, saving for a college fund, and investing in a retirement fund.
- 24 Researchers should study whether naturalized immigrants become more civically engaged than non-naturalized Lawful Permanent Residents or undocumented immigrants. If immigrants naturalize for economic reasons, sponsorship benefits, or the desire for security, does acquisition of citizenship subsequently increase their interest in and the likelihood of their participating in civic affairs?
- 25 Researchers should study the speed with which new citizens exercise their new political rights. Why do some new citizens vote immediately in the first elections in which they are eligible? What factors facilitate the entry of new citizens into the political system?
- 26 Researchers should study what percentage of immigrants start or resume receiving public benefits after

acquiring citizenship status to address perceptions that immigrants become citizens to access benefits.

- 27 Researchers should study the number of individuals immigrating to the United States based on a relative's citizenship status and subsequent petition for family reunification. Doing so would help illuminate the role of immigration as a family-strengthening policy.
- 28 Researchers should study the effect of the naturalization process and citizenship ceremony on applicants' sense of belonging to the United States and their trust in government. Does going through the bureaucratic process of naturalization alienate immigrants from government? Does the citizenship ceremony increase feeling of being "American"?
- 29 Researchers should study how immigrant parents know about derivative citizenship status for minor children, stratified by nationality, educational status, and points of access to naturalization information and assistance.
- 30 How do children's lives change (materially or in a sense of attachment) after their parents acquire citizenship and when children derive citizenship as a result?

Research on Capacity Building for Community-based Organizations and Government Agencies Concerned with Citizenship:

- 31 Researchers should survey immigrants before and after receiving naturalization services to assess the beneficiaries' "customer satisfaction" with naturalization programs.
- 32 Researchers in immigration demographics should document forecasts of anticipated naturalization rates by years and immigrant characteristics using past naturalization data and green card rates five years and beyond. This data will be helpful for programs assessing where to target their resources and activities and evaluating numerical outcomes.
- 33 Researchers should develop topographical images of states, cities, and neighborhoods according to immigrant populations naturalized and non-naturalized to assist program directors in locating and understanding the demographics of targeted groups.
- 34 Researchers should map the supply of language and civics instruction available, their geographic concentration, funding sources and amounts, and levels of instruction in order to compare the infrastructure to facilitate learning with the location and needs of the limited English speaking population in the United States.
- 35 Researchers should study what institutions facilitate immigrant integration in medium and small towns that are new gateway destinations. The findings can help new gateway communities in their capacity building

efforts to prioritize municipal revenue and services for maximum effectiveness and desirability.

- 36 Researchers should create a client and program evaluation tool to assess the effectiveness of resources spent on a national citizenship program.
- 37 Researchers of business efficiency models should study the workforce efficiencies of USCIS immigration benefit interviews conducted off-site in the community, compared to interviews conducted in standard, federal offices. (USCIS has used off-site facilities to conduct interviews in cooperation with community organizations, but some USCIS districts have begun to end this practice claiming it is an inefficient use of time. Contrary opinion suggests it is a time-saving measure for USCIS officers and particularly for immigrants. The use of "circuit rides" brings a few federal officers and their services into the community rather than requiring hundreds of people to travel long distances.)
- 38 Researchers should study the effectiveness of different government-nonprofit partnerships in providing information on citizenship, providing services to facilitate naturalization, and administering the naturalization program.
- 39 Researchers should study the effectiveness of nonprofit naturalization programs' resource development to determine how effective such programs are in securing matching funding.
- 40 Researchers should chart different countries' naturalization requirements and services provided (both programs and dollars amounts) to their immigrant populations.

Research on General Immigrant Incorporation:

- 41 Researchers should survey immigrants to assess voting attitudes and behavior and political opinions.
- 42 Researchers should study the political values and decisions of people holding dual citizenship. Is dual citizenship harmful to one nation's interest against another? Does dual citizenship increase ties (economic, social, and political) between countries? Is political involvement in one country transferable to another?
- 43 Researchers should identify immigrant definitions of integration in the United States and rank definitions by importance ascribed by immigrants. Barriers to integration can be identified and ranked according to severity.
- 44 Researchers should study how immigrant integration works effectively or ineffectively, similarly or differently, between the United States and other nations. How effective is immigrant integration in the United States, given the lack of a coherent immigrant integration policy, compared to countries with integration policies?
- 45 Researchers should study the intergenerational learning and socialization between immigrant parents and children, especially in the area of political behav-

iors. What effect does having a large, noncitizen population have on youth political and civic beliefs and behaviors? Are children of noncitizen parents more or less politically apathetic than children of naturalized parents?

- 46 Researchers should study how immigrants use English verbal, reading, and writing skills on a daily basis to assess the utility of English in different ethnic, linguistic, and geographic communities.
- 47 Researchers should study how immigrants view English as a common language for all to use and to assess immigrant attitudes that may encourage or discourage English acquisition.
- 48 Researchers should study why immigrants do and do not learn English at varying levels of verbal, reading, and writing abilities to identify barriers that can be addressed through policy-making decisions.

Capacity Building for the Research Community and Sharing of Results:

- 49 Researchers should publish a journal issue dedicated to studies in naturalization and citizenship.
- 50 Researchers should be involved in the beginning of a national citizenship plan led by government funding and implemented by private organizations to guide policymakers and practitioners in gathering information important for research.
- 51 Researchers should work more closely with naturalization and immigrant integration program developers to combine known facts through research with program models.
- 52 Researchers, policymakers, and program designers promoting citizenship and providing naturalization services should convene a regularly scheduled conference to increase the knowledge and understanding between various professional disciplines.

Legal Institutions

Respect for the rule of law and individual rights are hallmarks of the U.S. legal system. Regrettably, U.S. immigration policies have not always honored these principles. In 1996, for example, Congress passed three laws that place immigrants at greater risk of detention, removal, separation from their families, and loss of income and health care support. These are: the Antiterrorism and Effective Death Penalty Act of 1996, the Illegal Immigration Reform and Immigrant Responsibility Act (IIRAIRA) of 1996, and the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. Pro-immigrant legal agencies have worked vigorously to eliminate some of the harshest aspects and consequences of these laws.

Recent years have also seen challenges to the United States' historic commitment to citizenship. In 1990 Congress transferred the power of denaturalization from the federal courts to the Attorney General. Following the Homeland Security Act of 2002, denaturalization authority was delegated to the Department of Homeland Security's United States Citizenship and Immigration Services (USCIS). Possibly no development trivializes citizenship more than administrative denaturalization.

Administrative problems have also plagued the naturalization process. Over the past decade, waiting periods due to USCIS application processing backlogs have remained at one year or more. Improper naturalization denials have added to waiting times and frustration, leading attorneys to appeal cases and litigate against the federal government. Although published in 2000, CLINIC's report, *Citizenship at Risk: New Obstacles to Naturalization*, recounts many struggles that persist in 2006. Delays in citizenship harm both immigrants and U.S. society at large by slowing immigrant integration.

Several legal entities have been active in promoting a naturalization system that reflects the rule of law and honors immigrant rights. The American Bar Association (ABA) is the largest voluntary professional membership organization in the world, with more than 400,000 members. The ABA's Coordinating Committee on Immigration Law seeks to strengthen the rights of immigrants and their access to justice. On February 13, 2006, the ABA House of Delegates unanimously approved an important series of policy resolutions presented by the Coordinating Committee. One of the resolutions supports the need for "expanded and coordinated government programs to teach immigrants English, prepare them for citizenship, acculturate them in core U.S. civic values, and otherwise promote their integration into their adopted nation." Other recommendations include: a more efficient system for administering immigration laws and backlogs, swifter processing of Freedom of Information Act (FOIA) requests, greater enforcement against the unauthorized practice of law, and restoration of public benefits to legal immigrants and refugees. If implemented, these recommendations would significantly strengthen a national citizenship plan.

The ABA's Commission on Immigration has also contributed to the understanding of naturalization law with its publication, *Naturalization and Criminal Offenses, Detention, and Removal* (October 2004). This manual provides guidance on how to represent Lawful Permanent Residents with criminal convictions. Another publication, *Naturalization: Citizenship by Choice* seeks to generate greater public support for immigrants seeking citizenship. It also offers suggestions on how lawyers and advocates can help immigrants through the naturalization process.

ABA also provides training in naturalization law. Advanced naturalization training is particularly needed by attorneys who do not specialize in immigration law and who need instruction in how to recognize and address barriers to citizenship, like prior convictions, debilitating disabilities, and inconsistent information in the immigration file.

Funds for legal services to the poor are critically needed across the country. A growing segment of the poor with legal needs are persons with limited English proficiency. In addition to the more common legal difficulties faced by the poor—such as housing, employment, and family issues—immigrants also encounter “access to justice” and immigration challenges. The District of Columbia, for example, has an estimated 39,000 residents who speak little English and have trouble using the legal system.¹ Low-cost legal representation and language services greatly need increased funding.²

Another important legal entity that assists the poor is the National Association of Interest on Lawyer’s Trust Accounts (IOLTA). IOLTA funds come from the interest earned from pooled accounts containing court fees, settlement agreement, real estate closing, and other client funds that can only be invested for very short periods. State bar associations and courts distribute IOLTA monies to fund charitable legal services. While attorney participation is voluntary in 22 states³ IOLTA funds distribute more than \$135 million annually, making it second only to the federally funded Legal Services Corporation as source of funding for this crucial work.⁴

Maryland IOLTA’s 2004-2005 annual report indicates that it funded four organizations that provided legal immigration and naturalization assistance: Catholic Community Services of the Archdiocese of Washington, D.C. for \$102,000; CASA of Maryland for \$74,000; Associated Catholic Charities of Baltimore for \$33,000; and Asian American Justice Center for \$30,000. Most state IOLTA funds do not fund immigration services so generously and, overall, there is a great need for additional IOLTA funding for this work.

Private attorneys in the for-profit legal profession typically charge immigrants a much higher fee for naturalization application assistance and direct representation than charitable legal immigration programs. Private attorney fees for even working poor naturalization applicants with simple cases can exceed \$1,000, whereas charitable legal immigration program fees for similar cases may be only as high as \$100.⁵ However, many for-profit attorneys provide pro bono or reduced fee representation to poor immigrants. In addition, for-profit attorneys contribute volunteer time training and completing naturalization applications at workshops sponsored by nonprofit organizations.

Law schools also play an important role in the immigration field. Increasingly, they offer courses in immigration law

and host conferences and symposia on immigration issues. The latter offer important opportunities for academics, immigration policy advocates, and government representatives to discuss these topics. Examples of these events include the National Legal Conference on Immigration and Refugee Policy, cosponsored by Fordham School of Law and the Center for Migration Studies, and the Annual Immigration Law and Policy Conference, jointly sponsored by Georgetown University Law Center, Migration Policy Institute, and CLINIC. Law school clinics provide an opportunity for students, under the supervision of faculty, to represent low-income individuals in immigration proceedings. This experience broadens student understanding of immigration law and its impact on immigrants seeking asylum, family reunification, employment, and citizenship. Law professors and students also volunteer at citizenship application workshops, take referrals for complex and time-consuming cases, engage in policy research, and advocate for changes in the law.

Georgetown University Law Center’s Federal Legislation Clinic has cooperated closely with charitable immigration organizations and USCIS in a working group on disability issues, which helped write USCIS policy guidance on reasonable accommodations for applicants with disabilities in 2000-01. In 2000, the clinic successfully lobbied Congress for a waiver to the oath requirement for severely disabled naturalization applicants. More recently, it has lobbied Congress to restore Supplemental Security Income (SSI) benefits to elderly and disabled refugees facing the seven-year limit imposed by the welfare reform laws.

The American Immigration Lawyers Association (AILA) is the trade association for the nation’s immigration attorneys. AILA seeks “to promote justice, advocate for fair and reasonable immigration law and policy, advance the quality of immigration and nationality law and practice, and enhance the professional development of its members.”⁶ AILA offers a range of training, publishing and advocacy services for its members. The American Immigration Law Foundation, a legally distinct charitable agency, engages in high-impact litigation, public policy work, public education, and research. AILA’s interest in citizenship and immigrant integration is exemplified in its recent publication, *Power and Potential: The Growing Electoral Clout of New Citizens*. This report shows that, among registered voters, naturalized citizens vote at higher rates than natives. It concludes that the strength and influence of foreign-born voters will continue to grow.⁷

Charitable legal immigration programs help large numbers of immigrants to become citizens, and also serve those who are least likely to naturalize due to their limited income and language skills. They also provide significant outreach on the benefits and requirements for citizenship and the availability of free and fee-based services.

A number of national legal immigration organizations are helping to train local service providers and expand the avail-

ability of affordable legal immigration services. A short list of these include: CLINIC, Immigrant Legal Resource Center (ILRC), National Immigration Law Center (NILC), National Immigration Forum, Lutheran Immigration and Refugee Service (LIRS), U.S. Committee for Refugees and Immigrants (USCRI), Hebrew Immigrant Aid Society (HIAS), World Relief, American Friends Service Committee, Vera Institute for Justice, Mexican American Legal Defense and Educational Fund (MALDEF), League of United Latin American Citizens (LULAC), and the Arab Community Center for Economic and Social Services (ACCESS). These agencies serve immigrants regardless of religion, race, ethnicity, or nationality. Several of them -- including CLINIC, LIRS, USCRI, and HIAS -- support networks of local member agencies. CLINIC enjoys the nation's largest network with 161 member agencies that provide direct legal services in 260 sites.

Some of these organizations concentrate on public education and advocacy, others on training and publications, and still others on the full spectrum of public education, advocacy, training, publications, legal immigration, refugee resettlement, English classes, and naturalization classes. Many have discrete naturalization programs.

Several organizations have worked collaboratively over many years to maximize resources and establish an "industry" of charitable legal immigration programs. One vehicle that has served this goal has been the Immigration Management Program (IMP), originally funded in 1995 by the Ford Foundation as a collaboration between CLINIC, LIRS, and USCRI (formerly known as Immigration and Refugee Services of America). These three networks created a manual, *Immigration Management: Building Blocks for a Successful Program*, and implemented a series of trainings that are designed to enhance the financial viability and client services provided by local charitable programs for immigrants.

RECOMMENDATIONS:

Interest on Lawyer's Trust Accounts:

- 1 IOLTA funds should be expanded and additional monies should be devoted to naturalization services. Mandatory attorney participation and higher interest rates on pooled accounts would increase IOLTA funding.

Advocacy:

- 2 Legal institutions should actively support the ABA's policy in favor of "expanded and coordinated federal and state government programs to conduct large-scale citizenship outreach, assist in the naturalization application process, teach immigrants English, acculturate immigrants in core U.S. civic values, and promote integration broadly."

- 3 Legal institutions should advocate for more federal funding to USCIS to reduce application backlogs and stabilize application fees.
- 4 Legal institutions should advocate for more federal funding for English language instruction and citizenship classes that are vital in helping immigrants who speak limited English become citizens.
- 5 Legal institutions concerned about the unauthorized practice of law by naturalization counselors should advocate for state legislation defining and prohibiting the practice.
- 6 Legal institutions should advocate for more monies to state attorney general offices for staff, particularly bilingual staff, to investigate and prosecute unauthorized legal practitioners.
- 7 Legal institutions should advocate for more federal Legal Services Corporation funding for the poor, including immigrants with legal immigration and interpretation needs.
- 8 Legal institutions should support efforts to redress the funding and bureaucratic weaknesses in USCIS that inhibit immigrants from accessing services, including its increasing fees, long processing backlogs, limited client access to case status information, and poor customer service in general.

Research and Training:

- 9 Legal institutions should support research on immigrant legal needs, the effect of legal status on civic integration and immigrant attainment, and funding challenges for charitable legal immigration programs.
- 10 Legal institutions should assist in training sponsored by charitable immigration programs by providing space and serving as presenters.

Publications:

- 11 Legal institutions with expertise in naturalization and immigration law should update their training materials at least annually to ensure their accuracy.
- 12 Legal institutions that publish naturalization and citizenship materials should make them: understandable for qualified, nonattorney practitioners; affordable for charitable immigration programs; and widely advertised for easier access.

Conferences and Symposia:

- 13 Legal institutions should produce a common calendar each year that lists the conferences and symposia dedicated to naturalization, citizenship, and immigrant integration issues.
- 14 Legal institutions should include key naturalization, citizenship, and immigrant issues in their slate of educational events.

Citizenship Promotion and Direct Legal Services:

- 15 Legal institutions should join with federal, state, and local public and private funders to advocate for a national citizenship program.
- 16 Legal institutions should review the proposed national citizenship program and provide critical comments on its strengths, challenges, and expected outcomes.
- 17 Legal institutions should align themselves with nonprofit, immigrant-focused programs to help them implement best practices in immigration legal services.
- 18 Legal institutions should train, support and lend their expertise to community-based organizations that may wish to obtain BIA recognition so that they can represent low-income immigrants.
- 19 Legal institutions should participate as volunteers in naturalization application group processing workshops sponsored by charitable immigration programs. Professionals in naturalization law should review all completed applications for quality control purposes.
- 20 Legal institutions should provide expanded pro bono and sliding scale fee-based services for the most vulnerable immigrants in the naturalization process who are likely to increase in number under a national citizenship plan.
- 21 Legal institutions should provide technical assistance and otherwise support charitable organizations that provide naturalization services.

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- 1 *The Washington Post*. "Legal Services for D.C.'s Poor" (Editorial, February 17, 2006), p. A18.
 - 2 CASA of Maryland. *Unequal Justice: Barriers to Justice for Latinos in Maryland* (December 1999), p. 23-29.
 - 3 Rhudy, R. J. "Lawyers Create Income for Legal Aid Where There Was None Before" *The Daily Record* (July 1, 2005), p. 3.
 - 4 *Ibid*, p. 1.
 - 5 Interview with Catholic Legal Immigration Network, Inc. attorney John Holmgren conducted by the report's authors on February 21, 2006.
 - 6 American Immigration Lawyers Association. "Mission and Goals," available at: <http://www.aila.org/content/default.aspx?docid=12130>
 - 7 Paral, R. *Power and Potential: The Growing Electoral Clout of New Citizens* (Washington, DC: American Immigration Law Foundation's Immigration Policy Center, October 2004), p. 4.

Immigrant-Focused Nonprofit Organizations

Immigrant-focused nonprofit organizations that provide legal, social, and integration services would play a leading role in harnessing support for a national citizenship plan, implementing it, and driving it forward. These organizations are already involved in helping immigrants naturalize. Some of them focus on particular groups of immigrants, such as refugees, or certain ethnic groups. Some are immigrant-led, and most have immigrants on staff and in decision-making roles.

Some of the national organizations provide support to a network of local member agencies. Examples include: Catholic Legal Immigration Network, Inc. (CLINIC), Asian American Justice Center, National Council of La Raza, American Friends Service Committee, Arab Community Center for Economic and Social Services, and Southeast Asia Resource Action Center. National voluntary refugee resettlement agencies that support similar networks include: U.S. Conference of Catholic Bishops Migration and Refugee Services, Hebrew Immigrant Aid Society, U.S. Committee for Refugees and Immigrants, International Rescue Committee, World Relief Corporation, Episcopal Migration Ministries, Ethiopian Community Development Council, Church World Service, and Lutheran Immigration and Refugee Service.

Some national organizations work almost exclusively on immigration policy advocacy, such as the National Immigration Law Center. Immigrant organizations have advocated for Congress to pass pro-immigrant legislation, such as the Hmong Veterans Naturalization Act of 2000, the naturalization oath waiver for the severely disabled, elimination of the seven-year limit on Supplemental Security Income for noncitizen elderly and disabled refugees, and funding appropriations for backlog reduction at the U.S. Citizenship and Immigration Services (USCIS).

Other immigrant-focused nonprofits are membership organizations, such as the National Immigration Forum, the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, the League of United Latin American Citizens, the American Immigration Lawyers Association (AILA), and the American Bar Association (ABA).

State immigration coalitions provide support to local member agencies and engage in policy advocacy. Examples include the New York Immigration Coalition, Illinois Coalition for Immigrant and Refugee Rights (ICIRR), Massachusetts Immigrant and Refugee Advocacy Coalition, Capital Area Immigrants' Rights Coalition, Tennessee Immigrant Rights Coalition, and the Immigrant Legal Resource Center. Advocacy for state legislation

related to citizenship tends to focus on funding for citizenship services. For example, ICIRR successfully pushed for a \$3 million citizenship initiative in 2004. While the missions of these nonprofits vary, all seek to improve the lives of immigrants.

Immigrant-focused nonprofits mobilize their constituencies through updates on pending legislation via e-mail, list serves, and website postings. They often collect case studies of immigrants who are negatively impacted by legislation and use them to humanize abstract policy. They also organize advocacy days.

Many immigrant organizations engage in citizenship-related policy advocacy at the administrative level. In Washington, D.C., immigrant organizations have met monthly at USCIS headquarters since 1997. The organizations set the agenda and ask questions about USCIS policies and services. Much of the agenda is related to naturalization. Agenda items are collected and minutes are disseminated through the National Citizenship Network, which is staffed by NALEO. At the local level, many immigrant organizations attend liaison meetings with their USCIS district office. Often after consulting with their member agencies, organizations also submit written comments on USCIS proposed regulations published in the *Federal Register*. The feedback ensures a local and direct service perspective on the impact of immigration policies.

Two working groups have spun off from the monthly USCIS meetings. The working group on the naturalization test redesign is promoting a fair test that will not disadvantage certain groups or raise the naturalization denial rate. USCIS is benefiting from consultation with this group during the redesign process because it promotes community buy-in for a controversial initiative.

The second spin-off is the disability working group, which advocates for better access to naturalization for disabled applicants. This group has helped shape several policy guidance memoranda on disabled applicants and revise the Medical Certification for Disability Exceptions (Form N-648).

When administrative advocacy efforts with USCIS failed, some immigrant organizations have engaged in litigation to address problems. In 1998 a group of three organizations—Florida Justice Institute, Florida Legal Services, and Florida Immigrant Advocacy Center—filed a class action lawsuit in Miami on behalf of disabled applicants who were wrongly denied disability waivers of the naturalization test. The lawsuit resulted in new USCIS policies and procedures that helped ensure that disabled naturalization applicants were treated fairly.

Immigrant organizations also operate programs that directly assist immigrants to apply for citizenship using federal, state, or private funding. For example, CLINIC's Refugee Naturalization Project, funded by the federal Office of Refugee Resettlement (ORR) from 1997 to 2003, provided community outreach and naturalization application assistance to refugees in ten cities. ICIRR's New Americans Initiative uses state funding to support local immigrant organizations in assisting Illinois's more than 340,000 Lawful Permanent Residents to become U.S. citizens. The DC Citizenship Project relies on private funding from the Washington, D.C.-based Morris and Gwendolyn Cafritz Foundation to support the work of CLINIC and three local agencies in Washington, D.C., Maryland, and Virginia to provide naturalization outreach, workshops, and legal representation.

Membership organizations often provide technical assistance to their affiliates who are engaged in citizenship services. This includes: training on naturalization law, policies, and procedures; conferences; monitoring visits; immigration hotlines; and informational publications. For example, CLINIC provides at least three regional trainings on naturalization law per year and offers publications on naturalization, including *Citizenship for Us* and *Citizenship for Refugee Elders*. Immigrant Legal Resource Center's citizenship-related publications include a legal guide to naturalization and citizenship and a how-to guide for establishing liaison meetings with local USCIS offices. Technical assistance helps local organizations stay abreast of changes in immigration laws, policies, and procedures. In addition, it can help to identify and correct problems that occur when local USCIS offices fail to implement national policies.

Immigrant organizations are strongly networked and tend to have good communication channels. Most local organizations belong to national networks or state immigration coalitions, and subscribe to various immigration-related list serves. Such networks help to promote the rapid sharing of information and the coordination of advocacy needs and priorities among their participants. In addition, networks allow funders to disperse monies broadly, utilize a built-in system for technical assistance, and limit the amount of time they would otherwise spend managing a large project. It is easier for a funder such as ORR to manage one large grant to CLINIC, which is then re-granted to ten of its local member agencies, than to manage ten smaller grants to local organizations. Although national and regional immigration organizations work closely on certain issues, there is no single, overarching network to which all belong. This lack of coordination can create challenges.

Another challenge is lack of funding. Many immigrant organizations operate without sufficient and sustainable funds, leaving them to struggle to maintain the most basic services and unable to pursue new ideas or initiatives. The

lack of funding, particularly for citizenship services, has hobbled many organizations that had robust citizenship programs in the late 1990s. Federal and state funding for citizenship has declined in the last few years, leading to the elimination of many citizenship programs and services that were once available.

Constituent Services for Immigrants

The Arab Community Center for Economic and Social Services (ACCESS) has a close working relationship with Rep. John Conyer's office. The congressman's immigration caseworker comes to the ACCESS office in Dearborn, Michigan twice a week to meet with clients in need of congressional intervention with their immigration cases. The organization provides the caseworker with an office, phone, and workstation. Clients benefit because it is easier to go to ACCESS than to the congressman's office, while the congressman is able to deliver an important constituent service that promotes integration of the district's sizable Arab community and raises his profile.

Loans for Citizenship Fees

Catholic Charities of Santa Rosa, California, used a private donation to establish a fee assistance fund for its clients applying for citizenship. The agency found that fee waivers from USCIS took too long to prepare and were often denied. A loan fund proved a good alternative for those unable to pay the application fees. The agency uses the poverty guidelines or receipt of public benefits to determine eligibility and gives clients 18 months to pay back the loan.

RECOMMENDATIONS:

Funding:

- 1 Immigrant organizations that provide charitable legal services need to address their chronic lack of financial support by explaining and promoting their work to funders and the general public. In particular, they need to educate the public on the impact of legal representation and the positive difference it makes.
- 2 Charitable legal immigration networks should organize forums for funders, immigration coalitions, think tanks, and government officials that highlight the importance of their work, with the aim of securing additional support.
- 3 Direct service providers need to cultivate and educate potential funders on the crucial role they play in legalization and naturalization initiatives, and dispel the myth that large-scale direct service programs are too costly.

- 4 Charitable legal immigration programs need to document the importance of their work, remove institutional barriers to expansion, and pursue long-term funding strategies.
- 5 Immigrant organizations should educate funders on their citizenship services and the large number of eligible and soon-to-be eligible immigrants.
- 6 Immigrant organizations should provide training for funders, especially in gateway communities, on the basics of immigration and naturalization.

Advocacy:

- 7 The Board of Immigration Appeals (BIA) should eliminate the restriction that requires BIA-recognized agencies to charge only a nominal fee for services. It should also not replace the restriction with burdensome administrative and reporting requirements. Charitable programs should be able to obtain support from the people who use and benefit from their services.
- 8 Immigrant organizations should advocate for their states to expand lawyer trust accounts, known as IOLTA, which provide legal aid to the poor, by establishing mandatory, rather than voluntary, participation standards for practicing attorneys.
- 9 Immigrant organizations should advocate for more federal Legal Services Corporation funding for the poor, including immigrants with legal immigration and interpretation needs.
- 10 Immigrant organizations should attend liaison meetings with their local USCIS office, or work together to establish these meetings if they do not already occur. Local organizations should appoint one person who collects agenda items, submits them to USCIS, takes notes during meetings, and distributes the notes.
- 11 Immigrant organizations should share information with one another, work together to address issues of common concern, and maximize advocacy efforts.
- 12 Immigrant organizations should identify systemic problems at USCIS and bring them to the attention of USCIS officials through letter writing, phone calls, or local USCIS liaison meetings. If their efforts are not successful, they should contact congressional offices and national networks for assistance.
- 13 Immigrant organizations should track local USCIS District Office statistics on citizenship applications received and granted and write to local and state politicians quarterly to inform them.
- 14 Immigrant organizations and funders should work together with USCIS and the Office of Citizenship (OoC) to build consultative processes on immigration, starting at the local level and building to the national level. USCIS and OoC should broadly consult with stakeholders.

Legislation:

- 15 Immigrant organizations should advocate for more congressional funding for USCIS to reduce benefit application backlogs and stabilize application fees.
- 16 Immigrant organizations should advocate for more congressional funding for English language instruction and citizenship classes that are vital in helping limited English speakers become citizens.
- 17 Immigrant organizations concerned about the unauthorized practice of law by predatory and unqualified immigration counseling services should advocate for state legislation defining and prohibiting the practice in order to protect uninformed immigrants.
- 18 Immigrant organizations concerned about the unauthorized practice of law should advocate for more monies to state attorney general offices for staff, particularly bilingual staff, to investigate and prosecute predatory counselors.

Networking and Collaboration:

- 19 National immigrant organizations and others with member agencies should network with one another and communicate regularly in order to coordinate on issues of shared concern. Funders should support a network for the networks.
- 20 Local immigrant organizations that provide citizenship application assistance should join a national, state, or regional network in order to stay informed of legal changes and have a source of technical assistance.
- 21 Immigrant organizations should work with their local public benefits offices, such as the Social Security Administration, to create a referral system for public benefits clients in need of citizenship assistance, especially those at risk of losing benefits.
- 22 Immigrant organizations that do not provide citizenship application assistance should work closely with organizations in their community that do in order to ensure efficient referrals to their clients in need of citizenship help. They can also host events for legal organizations to present information to their clientele.
- 23 Immigrant organizations should partner with English and civics instruction providers to send staff to classrooms to answer students' questions about the citizenship interview and test and to facilitate referrals of students needing application assistance.
- 24 Immigrant organizations that provide citizenship application assistance should work closely with doctors completing disability waiver forms to educate them about the eligibility requirements and ensure the forms are complete and approvable before submission to USCIS.

Working with Immigrant Community Organizers:

- 25 Immigrant organizations that provide citizenship assistance should partner with immigrant community organizers to facilitate civic engagement before and after naturalization.
- 26 Immigrant organizations should partner with immigrant community organizers and recruit a group of volunteer attorneys to give legal consultations following community meetings on immigrant issues such as affordable housing, driver's licenses, and school improvements.
- 27 Immigrant organizations that provide legal services should invite immigrant community organizers to talk at community meetings on immigration legal issues and distribute advocacy materials.
- 28 Immigrant organizations should work closely with immigrant organizers by: identifying potential immigrant leaders among clientele and referring them to organizers; inviting organizers to speak to immigration program staff about their work; offering meeting space to organizers; inviting organizers to attend group consultations, meetings, or gatherings for shared presentations to clientele; serving as an advisor to organizers on immigration law or policy; participating with organizers in a joint letter-writing advocacy campaign; joining organizers in advocacy visits with legislators; inviting organizers to attend community celebrations or events sponsored by their group to present and distribute advocacy materials; and exploring programmatic linkages and joint funding opportunities with organizers.
- 29 Immigrant organizations should promote community action by displaying advocacy information in the office and distributing advocacy materials to clients.

Working with Congressional Offices:

- 30 Immigrant organizations should work closely with their congress member's immigration caseworkers to educate them about citizenship-related issues affecting immigrants and to obtain their assistance with difficult cases.
- 31 Immigrant organizations that provide citizenship legal assistance should partner with congressional representatives to sponsor citizenship workshops in the community. Workshops can be large and celebratory, and offer civic engagement information, entertainment, and refreshments.

Outreach:

- 32 Immigrant organizations, with the help of national groups, need to maximize available technology to map out high-immigrant populations and low naturalization rates in their community in order to target outreach, media messaging, and workshops.

- 33 Immigrant organizations need to conduct ongoing, sustained outreach in their communities on the benefits and requirements of citizenship in order to maintain interest and build greater numbers of applicants over time.
- 34 Immigrant organizations should include citizenship information in all of their community outreach activities.
- 35 Immigrant organizations that provide legal assistance should send a letter to all clients who are newly granted Lawful Permanent Residents informing them of their eligibility date for citizenship, other eligibility requirements, and the location of English language classes to prepare for citizenship. As an incentive, they could include a coupon for a discount on the cost of N-400 application assistance and a cassette tape recording of the 96 questions as a study aid for the citizenship test.
- 36 Immigrant organizations should partner with local schools to conduct citizenship outreach and see if the schools can offer space for citizenship workshops aimed at parents. Additionally, they can offer presentations about citizenship and Citizenship Day for school classes.
- 37 Immigrant organizations should work with the local news media to place stories about immigrant citizenship successes, challenges faced in the naturalization process, difficult cases that need high-level advocacy, and noteworthy programs.
- 38 Immigrant organizations should display information about citizenship in the waiting area of their office, with multilingual information about the benefits and requirements.

Workshops:

- 39 Immigrant organizations need to conduct naturalization group processing workshops on a regular basis in order to ensure visibility for their citizenship services and to sustain community relations.
- 40 Immigrant organizations that provide citizenship legal assistance should recruit former clients who successfully naturalized to assist at citizenship workshops.
- 41 Immigrant organizations should establish regularly scheduled mobile citizenship workshops for remote communities that have large immigrant populations in order to facilitate access to professional assistance.
- 42 Immigrant organizations should invite a representative from the local USCIS office to attend citizenship workshops and answer questions from the applicants.

Direct Services:

- 43 Charitable legal immigration programs should compare rates for legal service fees with other nonprofits to maintain reasonable industry standards.

- 44 Immigrant organizations that provide citizenship application assistance should obtain BIA recognition in order to avoid the unauthorized practice of immigration law.
- 45 Charitable legal immigration programs should charge fees to clients for legal services to enhance client participation and appreciation for the costs involved.
- 46 Charitable legal immigration programs need to analyze and design their legal services within the broader rubric of immigrant integration, including civic participation, social change organizing, rights and responsibilities, and volunteer opportunities.
- 47 Immigrant organizations should work with their local USCIS office and district courts in order to gain permission to conduct voter registration at oath ceremonies.
- 48 Immigrant organizations that provide citizenship application assistance should offer ongoing citizenship preparation classes and brush-up classes for review of test material. Alternatively, they should ensure a smooth referral of clients to these services at other agencies.
- 49 Immigrant organizations should work with Americorps or similar agencies to obtain a full-time volunteer to coordinate or support the citizenship program.
- 50 Immigrant organizations that provide refugee resettlement should: provide information about citizenship benefits and requirements in the cultural orientation classes for new arrivals; assist all eligible male refugees to register with the Selective Service as required for citizenship eligibility; and remind refugees after one year in the United States of the need to apply for a green card and assist them with the application.
- 51 Immigrant organizations should arrange to host a naturalization oath ceremony once or twice a year and make it a celebratory event with speeches, voter registration, passport application assistance, and refreshments.
- 52 Immigrant organizations should conduct voter registration of naturalized citizens on an ongoing basis at their offices, or provide voter registration information and applications for people to submit on their own. In many communities, certain individuals or organizations can become “volunteer deputy registrars,” allowing them to accept voter registration applications on behalf of the registrar.
- 53 Immigrant organizations should conduct a volunteer drive for English and civics tutors to help immigrants prepare for the citizenship test.
- 54 National and membership immigrant organizations need to assist their local member agencies with program evaluation, monitoring, and documentation of best practices to build accountability and a strong justification for future funding needs.
- 55 Immigrant organizations providing citizenship application assistance should use an integrated database system to track client and project outcomes.

- 56 Immigrant organizations should provide holistic citizenship services whenever possible.
- 57 Charitable legal immigration programs must gear up capacity and prepare for the impact of a legalization initiative that may reach millions of undocumented and out-of-status persons. This expansion is important because the service delivery for legalization, including outreach, intake, application assistance, and representation, will likely mirror key elements of a national citizenship program.

Celebrating Citizenship Day:

- 58 Immigrant organizations should organize special events and media coverage in honor of Citizenship Day on September 17, including workshops and oath ceremonies.
- 59 Immigrant organizations should, on their own or with their national parent organization, send a letter to the editor of the local newspaper about Citizenship Day.
- 60 Immigrant organizations that are faith-based should encourage their church to incorporate Citizenship Day into the religious service by recognizing the history and vitality of immigrants in the United States and offering a special blessing for naturalized citizens.

Marketing and Outreach

The power of mass marketing is strong and pervasive in U.S. culture. The U.S. public, adults and children alike, are constantly scrutinizing, accepting, and disregarding a steady stream of media messages. For the discerning consumer, the imperative questions are: “Is this message addressing what I need, want, or desire? How will this improve my life?” The power of marketing is in knowing a consumer group’s way of thinking through surveys, focus groups, and purchasing habits and advertising a product based on consumer feedback.

Immigrants are one segment of the population targeted by strategic marketing research and specialized messaging. There are more than 2,500 ethnic-media outlets, mostly newspapers and magazines, in addition to radio and television stations.¹ Whether corporations sell mainstream or ethnic products, they are increasingly using their advertising dollars to appeal to foreign-born communities. To do so, they recognize that immigrant consumer perceptions and behaviors are influenced by their acculturation outside the United States and that they must advertise in ways that resonate with people’s primary and most rooted cultural identity. The growing generation of the children of immigrants who are bi- or multicultural and bi- or multilingual is also an emerging target group for marketing.

Marketing to immigrants is not just the purview of commerce. Government must also reach the foreign-born population with effective messages in order to inform and serve them effectively. The government uses non-English messages and ethnically matched spokespeople to notify immigrants about an array of requirements and benefits, including Selective Service registration, income tax filing, driving rules, primary and secondary school enrollment, Social Security benefits, employment law, social services, and health care.

The channels used for mass marketing are steadily increasing in variety and sophistication, adding to the powerful mix of message, image, and sound. Internet advertisements are now commonplace on the Web. Advertisers send text messages and video casts to cell phones. How people navigate the cluttered terrain of marketing is a factor of contemporary life and affects their worldview.

Yet the federal government has not invested much money or time to develop basic public information tools to promote citizenship or direct applicants to service organizations providing naturalization assistance. The Department of Homeland’s Office of Citizenship (OoC) budget is severely limited, preventing it from creating a national citizenship media campaign and forcing it to charge a fee for most of its printed educational materials. Its national outreach largely consists of issuing press releases and citizenship news stories, and offering free downloadable publications on its website. Since its establishment in 2002, OoC has had to borrow staff from the United States Citizenship and Immigration Services (USCIS) for its community liaison functions. As of 2006 OoC has community liaison officers in only 19 cities, while USCIS, which is responsible for processing citizenship and other status applications, has 32 district offices. The officers work with immigrants, community-based organizations, and state and local officials to promote citizenship through forums, town meetings, and press releases.

Charitable nonprofits also use media and marketing strategies to attract immigrants. Depending on their mission, such organizations seek to communicate that they educate, serve, train, and empower immigrants, their families, and communities. In sophisticated or rudimentary ways, nonprofits devise outreach plans to attract people’s attention using flyers, brochures, posters, community presentations, print advertisements in non-English newspapers and magazines, radio commercials, community cable TV commercials and talk shows, and radio and TV public service announcements. Few local nonprofits have the money or expertise to create messages that have an appeal equal to those produced in the commercial sector. Even without a high degree of sophistication, the messages of nonprofit services easily resonate among people who have particular needs and trust the service organization.

Historically, promoting citizenship and providing naturalization services has been the purview of nonprofits. Without much direct assistance from government or businesses, nonprofits have relied on their own skills to relay the importance of citizenship. Partners in spreading information may include other social service agencies, places of worship, schools with adult English as a second language and vocational classes, and ethnic stores. The best outreach includes a combination of one-on-one contact, intermediary institutional contact, and a broad message through news sources accessed by immigrants.

Unlike many other aspects of immigration, citizenship is rarely debated, but rather embraced. Simply put, the native-born wish immigrants to become citizens and the vast majority of immigrants want to be citizens. The support of the native-born rests on the belief in equality and the democratic system. In turn, the foreign-born want citizenship as an expression of their appreciation for living in the United States, their desire to remain in the country, and their belief in the ideals of the U.S. government. There is much common ground in promoting citizenship and helping people achieve this particular aspiration.

The challenge before the United States is in overcoming the stinginess with which citizenship is encouraged and facilitated. The lack of financial resources for these purposes, especially outreach and communication efforts, is well-argued in many places in this report.

The foremost barrier immigrants face in becoming citizens is lack of information, according to interviewees informing this report. This is due to the lack of a highly visible citizenship campaign that inspires immigrants to act and directs them to local, professional services. There is no advertising about citizenship that is equal to the sophisticated campaigns promoting alcohol-free driving, abstinence from smoking, or reading to children at an early age. There is no national outreach saying citizenship is desirable and has specific benefits, requirements, and responsibilities. A media campaign adjoined to a national citizenship program is indispensable.

Currently helping to advance a widespread, pro-immigrant message is the National Immigration Forum, a nonprofit established in 1982 that is dedicated to affirming and sustaining America's tradition as a nation of immigrants. The forum conducts focus groups and surveys to poll the public's opinions on immigration, advocates for pro-immigration legislation and policies, publishes reports on immigrant integration and contributions, and develops media stories. It also provides media and messaging training for nonprofits to improve their skills in communicating the complexities of immigration. The forum and other pro-immigrant advocacy organizations experienced in commu-

nications are available to advise the federal government on how to develop and implement a national citizenship media campaign and what tools to use locally.

Non-English television and radio, newspapers, and magazines are an essential conduit of immigration information. Non-English television and radio stations frequently host talk shows on the issue. Ethnic radio and television talk show celebrities wield considerable influence among a large number of consumers on a range of issues, including immigration laws, citizenship promotion, and get-out-the-vote drives. For example, New California Media, a nonprofit organization of more than 400 ethnic media outlets, found that "ethnic media reaches 84 percent of California's three largest minority groups: Latinos, blacks, and Asians."² *La Opinion*, a Spanish daily newspaper, includes immigration issues as a bread-and-butter topic.³ Such media influence has been attributed in part to the large numbers of people demonstrating in the spring of 2006 in favor of legislation to legalize undocumented workers.⁴

Television and radio broadcasters frequently reserve air time for call-in programs to enable viewers and listeners to ask immigration questions of experts, often immigration attorneys either from a for-profit practice or nonprofit immigration program.⁵ A future national citizenship media and public information campaign could benefit from the free air time media companies give for public service announcements, and work with talk show hosts interested in citizenship issues, especially those offering callers a chance to hear extended, detailed information.

Promoting citizenship messages through talk shows and similar media outlets can be problematic, however. Legal immigration practitioners complain that media too frequently gets the facts wrong, spreading misinformation or causing unnecessary alarm in the immigrant community. Talk show hosts or their guests may not consistently uphold legal and ethical concerns espoused by immigration practitioners.⁶ They may simplify or omit complex terms and facts to fit available airtime, even if given scripted information prepared by legal immigration experts. Immigration experts, in turn, should restrict their media-based messages to broad facts and avoid offering individual immigration advice over the airwaves.

Even without a national citizenship program or media campaign, some states are successfully conveying citizenship messages. The most active citizenship campaign currently is the New Americans Initiative (NAI), operated by the Illinois Coalition for Immigrant and Refugee Rights (ICIRR). In late 2004 ICIRR began to develop a community outreach and media strategy to promote citizenship. An experienced, for-profit marketing consultant was funded to create a comprehensive communications plan, develop messages based on research, produce four 15-

second television ads and two 60-second radio ads, place newspaper ads, and help service providers with event planning. Materials such as flyers, brochures, tear-off pads, and posters were produced in English, Spanish, Korean, Chinese, and Polish. Media spots directed people to NAI's toll-free number and website where calls and website hits were tallied.

The mass media initiative helped draw thousands of people to make contact with service providers, attend naturalization application workshops, and come prepared with the necessary documentation. During the campaign, ICIRR learned that immigrants and ethnic organizations respond best to print images that reflect themselves; something not easily achievable with a limited budget and a desire to create a brand look for the project. Yet direct service providers were able to modify the brand look slightly to add more appeal to their target populations. In a national citizenship plan, a media campaign should have a common nationwide look, but allow for local adaptations in messaging.

In another form of outreach, video can be used to make naturalization test preparation materials more widely available. Common teaching tools are instructional booklets used mostly by limited English speakers in a classroom. However, video instruction can reach a much wider audience. In 1997 Coors Brewing Company produced an English-based instructional video of the 96 naturalization questions. Ethnic-based organizations such as Hebrew Immigrant Aid Society, Asian American Justice Center, and Horn of Africa Services developed instructional videos in English and non-English languages in the mid-1990s, a historically high period for naturalization. A challenge for nonprofits is having the time and money to regularly revise videos based on changes in the naturalization process.

An McDowell, a citizenship teacher in Salinas, Calif., for 27 years, began developing audiovisual preparation materials for citizenship preparation in 2001. Her company, now called Citizenship Resources, distributes a recently updated video called *Citizenship, Success at Your CIS Interview*, which takes the immigrant from the waiting room through the entire interview and includes questions on trips out of the country, moral character, allegiance to the United States, and U.S. history and government. Over 40 native- and foreign-born volunteer actors play the part of the USCIS examiner and the applicant in simulated mini-interviews. The immigrant viewer can practice his or her own answers in eight "It's your Turn" sections. The video (or DVD), which is designed for all levels of English and literacy, is available in Spanish for those who qualify to take the test in their native language.

In addition to video outreach, naturalization information is increasingly available on websites. The USCIS website provides materials, referrals, other organization's resources

and related links. Other websites are hosted by commercial enterprises and nonprofits providing information about naturalization eligibility and requirements, the application process, and educational tools to prepare for the naturalization test. Website instruction can be an accessible, attractive, and effective medium for highly skilled English speakers who have the computer literacy necessary to study independently. However, users should always check the date indicating when the contents were last updated. They should also avoid using on-line services to have a naturalization application reviewed for legal advice. On-line review has serious limitations and cannot be a substitute for a face-to-face review by a legal expert.

An online Citizenship Exam Preparation course is provided by The English Center, a division of Miami-Dade County Public Schools in Florida. The online course was adapted in early 2006, based on an earlier curriculum written by Dr. Gemma Santos. It provides a multimedia survey of topics related to U.S. history, U.S. government, and information considered essential for passing the naturalization exam. The student is able to access the course 24 hours a day, seven days a week. Each student is assigned a teacher who guides, instructs, monitors, and is available as a resource at specified hours. The course includes many links to outside websites related to the chapter topics. The course is free but available only to students who are Florida residents and enrolled in the center's programs. More efforts need to be made in web-based learning for the millions of immigrants who do not attend citizenship classes but need and desire specific information and instruction.

In summary, a national citizenship program should use marketing and outreach strategies wisely, based on research and input from target audiences. Effective messaging is critical to informing immigrants about citizenship. Any national media campaign should have a branded image that is easily recognizable and readily adaptable for local campaigns to insert information about neighborhood resources. Monies for media marketing and outreach should be ample for the scope of the national initiative but directed chiefly to local markets and organizations that have the confidence and trust of consumers. National and local marketing efforts should have an evaluation component to assess the best use of funds and the effectiveness of the messages.

RECOMMENDATIONS:

Marketing and Outreach Partnerships:

- 1 A national citizenship campaign needs to be a national priority in partnership with prestigious companies, individuals, and service organizations.
- 2 Media marketing experts should partner, for free or at a reduced rate, with the OoC and local charitable legal immigration programs in periodic national citizenship

promotion campaigns to keep citizenship visible and services readily identifiable.

- 3 Network and cable television should promote citizenship through public service announcements, along with a list of community resources and events on the community calendar that facilitate naturalization.
- 4 Media specialists working on a national citizenship program should partner with citizenship service experts to produce an instructional video of the naturalization process designed for the limited English speaker and persons with special needs, coupled with an effective distribution plan.
- 5 National and local citizenship media campaigns should be scheduled in coordination with national networks and local immigrant service organizations in order for them to be prepared for a sudden increase in the number of calls for help.

Planning and Strategy Development:

- 6 Mass media campaigns promoting citizenship should only be launched after a national citizenship program's infrastructure has been established, in order to sufficiently build up the necessary capacity and partnerships for any large response.
- 7 Media campaigns promoting citizenship should follow the success of using spokespersons to support voter registration and get out the vote drives.
- 8 Media experts should test market high profile naturalized immigrants as potential spokespersons for a national citizenship promotion campaign. They should do similar testing in targeted local markets with local, high profile, foreign-born citizens. Candidates should be selected for their successful professional life, admirable character, and contributions to the community and country.
- 9 Media researchers participating in a national citizenship campaign strategy should conduct focus groups of naturalized and non-naturalized immigrants, focusing on immigrant groups that have the lowest naturalization rates.
- 10 Media campaigns for citizenship promotion using public funds should not have trademark or image branding limitations, but be designed for easy and affordable adaptation by local charitable organizations for local production and distribution.
- 11 Before a national campaign, local citizenship campaigns should test market messages and images with different nationalities and ethnic groups to determine which are most appealing and memorable in promoting citizenship. The successful branding devices should then be test marketed nationally before being used for a national campaign.
- 12 Local citizenship campaigns should feature people who assist immigrants in becoming citizens to demonstrate

how helping others obtain citizenship is personally rewarding and builds community spirit.

- 13 Media campaigns promoting citizenship should rely heavily on national and local ethnic media .
- 14 As part of a campaign for citizenship, a 1-800 number should be set up for information about local citizenship services. Media campaigns for citizenship should draw audience attention to this number. The number should ask, "What language do you speak?" followed by a second request, "What is your mailing zip code?" whereby the message in the chosen language provides information about local citizenship services.
- 15 Media campaigns should occasionally be directed beyond the immigrant community at the broader society, in order to keep all Americans informed and appreciative of citizenship.
- 16 A national citizenship promotion campaign should include a timely Public Broadcasting Service (PBS) airing of a commissioned documentary of the naturalization process, featuring immigrants in the process of becoming citizens and showing their struggles, failures, and successes.
- 17 A national citizenship promotion campaign and accompanying educational materials should be supported by a sufficient budget to provide regular updates about the naturalization process as laws, regulations, and procedures change.

Marketing and Messaging Ideas:

- 18 Outreach to news and other media to build appreciation for immigration should be based on true-life stories of individuals. Stories should be told simply, avoiding immigration complexities and focusing on the benefits of immigration. Stories about individual immigrant achievements, particularly in a family context, that mirror native-born Americans' hopes will help people to better identify with immigrants.
- 19 Media messages to build appreciation for immigration and show that citizenship is worth obtaining should have a strong emotional component, matched with practical information.
- 20 Media messages promoting citizenship should focus on the highest priorities immigrants consistently articulate for their lives: economic progress, family unity, and having a political voice through voting. Messaging should affirmatively state, with personal examples, how citizenship helps achieve these goals.
- 21 Media messages promoting citizenship should make clear that a national citizenship campaign is not about legalization for undocumented immigrants.
- 22 Media messages promoting citizenship should avoid using images of large naturalization oath ceremonies so as to not arouse undue concern that there are too many immigrants in this country. Stories promoting citi-

zanship should not focus on the number of immigrants or aspiring citizens, but on individual success stories.

- 23 Media messages promoting citizenship that feature small naturalization oath ceremonies should highlight the relationships between foreign and native-born citizens, such as native-born relatives, friends, coworkers, pastors, or English tutors, who are celebrating the experience together.
- 24 Campaigns promoting citizenship should target the media on the important dates of July 4 and September 17 (Citizenship Day) when naturalization oath ceremonies are often given special attention.
- 25 As part of a national citizenship campaign, positive depictions of the decision to become a U.S. citizen and the naturalization process should be incorporated into the scripts of dramas or “novellas,” typically aired on Spanish language and other non-English language television shows.
- 26 Outreach to encourage immigrants to apply for citizenship should use a multimedia approach through television, radio, posters, and flyers and incorporate various native languages and ethnic images.
- 27 Media messages to encourage immigrants to apply for citizenship should capture people’s attention quickly, provide practical information, and end with an encouraging message on how to take action.
- 28 Media messages to encourage immigrants to apply for citizenship should not recount the difficulty, length, or cost of the naturalization process but focus on the high percentage of success among the hundreds of thousands of immigrants who apply each year.
- 29 Messaging for radio should not require the listener to write down detailed information. Rather, radio announcements should be inspirational and deliver only simple facts that can be easily retained. Television messages can offer both inspiring images and written facts and information.
- 30 Local community television stations in English and other languages should run immigration programs that have charitable immigration attorneys or representatives accredited by the Board of Immigration Appeals to share immigration news and answer general questions that do not require case specific information.
- 31 Mass media campaigns to promote citizenship on a national or state level should be professionally developed but not exorbitant in cost. Most of the funders’ resources should provide messaging opportunities for grassroots initiatives that can be done more cheaply and effectively where citizenship-driven activities will occur. Mass media campaigns should not take away funds from much-needed direct services.
- 32 A mass media campaign promoting citizenship should be developed with input from a voluntary panel of media experts, immigration service providers, immigration advocates, and immigrant-led organizers.

- 33 Media corporations should partner with the OoC and citizenship instruction experts in designing multimedia learning for students who self-study for the naturalization exam. If affordable, accessible, and appropriate, on-line and DVD materials could be instrumental in helping millions of immigrants obtain citizenship.

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Faith Communities

The United States is a religious nation. A 2004 Gallup poll found that six out of ten Americans described religion as “very important” to their daily life, 64 percent said they belonged to a church or synagogue, and 43 percent had attended religious services in the past seven days.¹ A 2002 poll by the Pew Forum on Religion and Public Life found that religion is greatly valued by many Americans, with 58 percent responding that “the strength of American society is based on the religious faith of its people.”²

Faith communities bring people together and forge social and spiritual bonds. They provide numerous forms of support for their members, such as emergency cash assistance, food pantries, child care, and counseling. Religious leaders and laity are also often involved in the political sphere, taking positions on policy issues that affect or concern members. They played key roles in the movement to abolish slavery and to advance civil rights. Because they have a history of assisting immigrants and offering services to foster their full integration into society, many faith communities are active on immigrant issues, including citizenship. For example, an interfaith coalition in 2006 is working on immigration reform.

Faith communities have an important role to play in a national citizenship plan for several reasons. First, they can lend depth to the discussion of citizenship by speaking about human rights and the responsibility to be a good citizen and give back to one’s community. Second, they are

effective agents of change because they have the ability to rally large numbers of people to a cause, both at the grass-roots and national level.

Third, many faith communities have significant numbers of immigrant members. A study of the religious preferences of recent immigrants who are Lawful Permanent Residents found that nearly two-thirds described themselves as Christian: 42 percent identified themselves as Catholic, 19 percent as Protestant, and 4 percent as Orthodox Christian. The next largest group was Muslim (8 percent), followed by Buddhist (4 percent), Jewish (3 percent), and Hindu (3 percent).³

Fourth, many faith communities have a long tradition of caring for immigrants and specifically teach how their members should treat immigrants. Many local communities have ethnic ministries that reach out to specific immigrant groups and minister to their spiritual needs. In the United States, faith-based organizations are the backbone of the refugee resettlement program and work closely with local congregations that provide a wealth of resources to new arrivals. Out of nine national voluntary agencies that resettle refugees, six are faith-based and all have long histories that date back to World War II or earlier. Many that began primarily aiding refugees now offer immigration services, including citizenship assistance, as part of their efforts to fully integrate newcomers.

One of the national refugee resettlement agencies, the Hebrew Immigrant Aid Society, was founded in the 1880s to assist Russian Jewish immigrants. In the Jewish tradition, care for the immigrant is rooted in the Torah, which in 36 instances commands the Israelite community “to be kind to the stranger, to care for his needs and indeed to love him.”⁴ Because the Israelites had once been foreigners in Egypt, they were enjoined to be especially aware of the needs of strangers in their own midst, and to treat them humanely out of empathy.

“You must not oppress the stranger; you know how a stranger feels, for you lived as strangers in the land of Egypt.” –Exodus 23:9

Various Christian traditions have also demonstrated a concern for immigrants. In 1944 the National Association of Evangelicals established World Relief, an international relief agency, with a mission to “work with, for, and from the Church to relieve human suffering, poverty, and hunger worldwide in the name of Jesus Christ.” As part of this mission, the agency mobilizes U.S. churches to reach out to newcomers and provides immigration services, including citizenship assistance and English language training. The World Relief vision statement reads: “We believe showing suffering people that Christians care and

that the Church wants to make a lasting impact on their lives is a powerful expression of our faith and our love for God.”⁶

The Lutheran Church in the United States cares for immigrants and refugees through Lutheran Immigration and Refugee Service, founded in 1939 to bring “new hope and new life.”⁷ The agency seeks “a world where all communities welcome refugees and migrants.”⁸ It bases its service to migrants on love of God, the sacredness of human life, and the need to treat all people with dignity, compassion, and respect.

The Presbyterian Church also works to aid immigrants and integrate them into the community. In a 1999 statement, the 221st Assembly of the Presbyterian Church noted: “In Christ, barriers no longer divide and alienate; reconciliation is the new reality. All persons in all cultures are our neighbors. Jesus identified with the stranger in his own context and clearly emphasized hospitality as one sign of the reign of God.”⁹

Welcoming Immigrants

Ecumenical Ministries of Iowa, which represents ten Protestant denominations, joined with the University of Northern Iowa to produce a guide entitled, *Welcoming New Iowans*. The guide contains information and resources on the history of immigration in Iowa, the Christian responsibility to newcomers, and ways to welcome newcomers in Iowa’s communities and churches. In explaining the Biblical basis for welcoming the stranger, the document states: “The powerful message that pervades the Old and New Testaments is that when we humbly offer hospitality to a stranger we meet on the road—even someone who might be among the least worthy to receive our attention and help—we encounter God.”¹⁰

In Catholicism, there is a rich tradition of care for the immigrant, and migrants occupy a place of almost unique reverence. The Catholic Church identifies with migrants based on its own history and experience. The Church cites the Holy Family, fleeing from King Herod, as “the models and protectors of every migrant, alien, and refugee of whatever kind who, whether compelled by fear of persecution or by want, is forced to leave his native land, his beloved parents and relatives, his close friends, and to seek a foreign soil.”¹¹

More importantly, the Church identifies newcomers and other marginalized people with God. “I was a stranger and you welcomed me” (Matthew 25:35). Thus, Catholic social teaching calls believers to welcome newcomers as “brothers and sisters.” This moral imperative encompasses

pastoral care and political empowerment. The Church treats the participation of all immigrants in civil society as their right and the community's responsibility.

Catholic Bishops Support Citizenship

U.S. Catholic bishops have eloquently affirmed the importance of citizenship. In their 1999 statement, *From Newcomers to Citizens: All Come Bearing Gifts*, the bishops stated, "The Catholic Church believes that citizenship affirms basic human dignity by allotting full political and legal rights to the individual."¹² They further stressed the importance of citizenship to the wider community by quoting Cardinal Theodore McCarrick: "By becoming citizens, [immigrants] reinforce the equities that they have built in this country and become full partners in the course and life of our nation."¹³ The bishops also addressed the need for citizenship assistance, stating: "As citizens, we have a responsibility to assist those who qualify to take advantage of the opportunity to become U.S. citizens."¹⁴

The Muslim faith also has a history of caring for migrants. The calendar in Islamic countries begins with the year that the Prophet Mohammed took flight from the Arabian city of Mecca and sought refuge in Medina. It is known as the hijra calendar, hijra being the Arabic word for flight or migration. In Medina, Mohammed found safety after being persecuted for his belief in one God. Consequently, Muslims know through the Prophet Mohammed's flight the importance of finding sanctuary for one's beliefs.

Welcoming the stranger is embedded in Arab culture, especially in Arab Bedouin culture. Historically, a weary, unfamiliar traveler is welcomed in one's home and given water, food, and rest for days without being asked who he is, where he comes from, or why he is traveling. Bedouins welcome the stranger based on need rather than social status.

In the United States, Muslims and Buddhists also demonstrate their concern for migrants through concrete programs and services benefiting their own communities. For example, mosques may provide emergency cash assistance for members in need and Buddhist temples often provide socialization programs or citizenship classes for elders. These faith communities often help support refugees' long-term integration needs after resettlement services end.

Many religious communities are involved in citizenship-related activities. In Los Angeles, Catholic churches with large numbers of Latino parishioners host citizenship assistance workshops offered by Catholic Charities. They also

provide publicity about the workshops by distributing flyers and printing announcements in their bulletins. Churches also host brush-up classes to help applicants prepare for the naturalization interview and review U.S. history and civics questions for the test. The workshops, which are held several times each month, typically produce 20-35 citizenship applications.

For several years, the Buddhist Temple in Silver Spring, Md., provided citizenship classes for elderly Cambodian, Vietnamese, and Chinese refugees. The Baltimore City Community College (BCCC) sponsored the classes. When families went to religious services on Sunday mornings, they brought the elders to attend class. When BCCC tried to schedule classes in fall 2005, it learned there was no longer a need for them because all of the elders in the community had successfully naturalized.

The Karbala Islamic Center in Dearborn, Mich., has partnered with Community Immigration Legal Services of the Archdiocese of Detroit to provide citizenship information to its members. Arabic-speaking staff from the archdiocese visit the center on a regular basis to give presentations and answer questions. The visits coincide with religious events or services and also are scheduled when changes are made to immigration law and large numbers of people are seeking information. Topics include the benefits of citizenship, what to expect at the citizenship interview, and the importance of professional legal assistance. In addition, the Center distributes citizenship outreach materials to its members.

In central New Jersey, the Bris Avrohom Center for Russian Jewish immigrants provides daytime and nighttime English language and periodic citizenship classes to help immigrants and refugees integrate into American society. The citizenship classes are geared to elders who need extra help to pass the test. The center also recruits volunteers to tutor students in English.

RECOMMENDATIONS:

- 1 Faith communities, especially those with a large immigrant membership, should assist immigration service agencies in community outreach efforts on naturalization. In particular, they can make announcements at their worship services, post flyers, and place notices in their bulletins.
- 2 Faith communities that have affiliated schools or daycare programs with children from immigrant families should provide information to parents about the benefits and requirements of citizenship.
- 3 Faith communities that provide social services for the poor should conduct citizenship outreach through these programs.

- 4 Faith communities should provide space to immigration service agencies for citizenship workshops, English language classes, and citizenship classes.
- 5 Faith communities should recruit volunteers from among their members to assist at citizenship workshops, teach English and civics classes, and tutor students.
- 6 Faith communities should participate in advocacy efforts on immigration reform and citizenship promotion.
- 7 Faith community leaders should speak out about the rights and responsibilities of citizenship and the need to assist immigrants in this process.
- 8 Faith communities should use their national denominational forums to talk about immigration and immigrant integration issues, including citizenship, and to share best practices in programming.
- 9 Faith communities should include immigration and citizenship issues in their publications dealing with social justice and social services.

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Civic Organizations

Civic organizations forge social bonds between people and strengthen communities. They bring people together for social and recreational activities. At the same time, they are involved in charitable activities and contribute many volunteer hours to humanitarian causes. Importantly, civic organizations build social capital, described as "the collective value of all 'social networks' and the inclinations that arise from these networks to do things for each other."¹ In his seminal book, *Bowling Alone*, Robert Putnam notes that social networks "affect the productivity of individuals and groups" and lead to "norms of reciprocity and trustworthiness."²

Civic organizations, both national and local, have an important role to play in a national citizenship plan for two key reasons. First, they have an interest in promoting citizenship because they have increasing numbers of immigrant members, who tend to be significantly younger than traditional members. *Bowling Alone* notes the decline in membership in civic organizations, which peaked in the 1950s and 60s. By promoting naturalization, civic organizations can increase their visibility in immigrant communities and recruit new members. For example, less than 10 percent of Lions Clubs in the United States are predominantly immigrants, but the newest clubs are immigrant-based and have younger members.³ The Knights of Columbus, a Catholic fraternal organization, has dedicated staff to Hispanic recruitment and the formation of Hispanic councils throughout the United States.

Second, naturalization and citizenship activities fit easily within many civic organizations' missions and interests, particularly those that emphasize patriotism. Even organizations with other missions can mesh citizenship activities within their goals. For example, some civic organizations focus on education or specific groups, such as children, families, or the elderly. The Lions Club promotes service and "building a brighter future for [the] community."⁴ The Rotary Club emphasizes "the ideal of service in each Rotarian's personal, business, and community life."⁵

Most local civic organizations belong to national or international networks, which foster coordination and information sharing and would be advantageous in a national citizenship campaign. One national network that could work on naturalization-related issues is the National Conference on Citizenship (NCoC), created in 1946 to encourage a more active, engaged citizenry. It was federally chartered in 1953 and mandated to: hold an annual, national conference on citizenship; assist in making citizenship more effective by encouraging local, state, and regional citizenship conferences; and highlight how organizations can contribute to a more active citizenry. Its

members include U.S. history and civics teachers, students, historians, professors, nonprofit and foundation leaders, and officials at the federal, state, and local levels.

Many civic organizations are not aware of the range of citizenship-related activities available and the great need for assistance. However, several organizations are already involved in these activities. In Alexandria, Va., the Daughters of the American Revolution (DAR) attend citizenship swearing-in ceremonies where they provide U.S. flags to new citizens, lead the Pledge of Allegiance, and give speeches. They encourage voting and civic engagement and urge new citizens to be proud of their heritage and to participate in the civic life of their new country. DAR chapters in other communities also participate in citizenship swearing-in ceremonies, thus furthering the organization's commitment to patriotism.

The Knights of Columbus, which emphasizes patriotism and civic engagement, partners with Catholic Charities immigration programs to assist immigrants in becoming citizens in several communities, including Los Angeles, Dallas, Long Island, N.Y., and Richmond, Va. The Knights volunteers conduct community outreach on the benefits and requirements of citizenship; assist immigrants in completing the citizenship application at workshops; teach classes on U.S. history and civics; and attend citizenship swearing-in ceremonies where they hand out flags, conduct voter registration, and help complete passport applications for new citizens. The Knights of Columbus provided financial support for these citizenship services through a one-year grant to Catholic Legal Immigration Network, Inc. (CLINIC).

AmeriCorps, a volunteer program that is part of the Corporation for National and Community Service (CNCS), places full-time volunteers in nonprofit, faith-based, and other community organizations to work on anti-poverty and other projects. Its Citizenship AmeriCorps Project now has 37 full-time volunteers in 12 immigration service agencies throughout the country where they are assisting immigrants to naturalize. The volunteers make at least a one-year commitment and receive a stipend to cover their living expenses and an education award that can be used for tuition or college loan repayment. They teach English and civics classes, assist immigrants in completing the citizenship application, recruit more volunteers for the citizenship program, and plan naturalization events. The U.S. Committee for Refugees and Immigrants runs the program through a grant from CNCS.

RECOMMENDATIONS:

- 1 Civic organizations should partner with immigration legal service agencies to assist with citizenship workshops, community outreach, English and civics classes, and swearing-in ceremonies.
- 2 Civic organizations should partner with local U.S. Citizenship and Immigration Services offices and courts to participate in citizenship swearing-in ceremonies by conducting voter registration, providing U.S. flags, assisting with passport applications, and providing other kinds of help as needed.
- 3 Civic organizations that are involved in citizenship swearing-in ceremonies should consider expanding their role to include volunteer work at citizenship application workshops, as well as English, history, and civics classes.
- 4 Civic organizations that provide grants should fund citizenship legal service agencies. A grant as modest as \$3,000 can support outreach and quarterly citizenship workshops in the community.
- 5 The NCoC should use its network of members and contacts to advocate for more funding for the Department of Education to expand English and civics instruction.
- 6 The NCoC should partner with the Office of Citizenship and teachers experienced in English as a second language and civics instruction to develop a U.S. history and civics curriculum.
- 7 The NCoC should feature speakers on naturalization at its national conference and look for ways to increase the naturalization rate.
- 8 National volunteer service programs such as AmeriCorps should strive to place more volunteers on citizenship projects with immigration legal service agencies and as English and civics instructors.

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The Business Community

Immigrants relate to the business sector as employees, business owners and suppliers, and customers. In 2000 immigrants were 11 percent of the U.S. population and nearly 15 percent of the labor force.¹ The business sector, and the U.S. economy in turn, benefits greatly from immigrant workers. In the 1990s immigrants “accounted for half the growth in the U.S. workforce.”² According to the Employment Policy Foundation, “without the contribution of immigrant labor, the output of goods and services in the U.S. would be at least \$1 trillion smaller than it is today.”³

Immigrant workers are distributed broadly across various occupations, but the largest percentage, 44 percent, are employed in managerial, professional, technical, sales, and administrative support occupations.⁴ Many industries, particularly in the retail, agricultural, and service sectors, depend overwhelmingly on immigrant labor. Immigrants represent 34 percent of those working in “private households,” 21.4 percent of those providing other “personal services,” 18.5 percent of the workers in “eating and drinking places,” and 12.8 percent of construction industry employees. In 1997-98, a full 81 percent of farmworkers were foreign born.⁵ Immigrants also dominate garment industry, meatpacking, and poultry processing jobs. The majority of foreign-born workers in the United States—63 percent—are noncitizens.⁶

While immigrant workers enrich our nation and improve our quality of life, many do not reap the just benefits of their work. Instead, they endure subminimum and nonpayment of wages or do not earn enough to escape poverty. In addition, immigrants work disproportionately in jobs that do not provide health insurance or other benefits that most workers take for granted. Only 26 percent of immigrants have job-based health insurance⁷ compared to 59.8 percent of the general population.⁸ At the same time, many immigrant workers suffer from occupational hazards.

Like immigrants of the past, many immigrants today are business owners and entrepreneurs. The U.S. Hispanic Chamber of Commerce reports that the number of Hispanic-owned businesses grew by 31 percent from 1997 to 2002. In New Mexico, Texas, Florida, and California, 15 to 22 percent of businesses are Hispanic-owned, and the Internal Revenue Service predicts that by 2007 one in 10 small businesses will be Hispanic.⁹ A recent report from the U.S. Census Bureau found that “Hispanics are opening businesses at a rate that is three times faster than the national average.”¹⁰ One third of all minority businesses are owned by Asian Americans, yet these businesses accounted for 51 percent of the revenue generated by minority businesses in 1997, a gross receipt of \$306 billion. In 2000 over 2.2 million workers were employed by Asian American businesses.¹¹ Increasingly, the business sector is made up of immigrant business owners.

In addition to being workers and business owners, immigrants are increasingly affluent customers who cannot be ignored. According to the U.S. Census Bureau, the number of Hispanic households with incomes over \$100,000 increased by 137 percent between 1990 and 2000. Hispanic purchasing power is nearly \$700 billion, and is expected to reach up to \$1 trillion by 2007.¹² Asian Americans have approximately \$230 billion in spending power, and in 2000 they had the highest median household income of all ethnic groups, at \$51,205.¹³

For a number of reasons, the business sector should do more to help immigrants become fully integrated citizens in U.S. society. First, businesses have greatly profited from immigration. Consequently, the business sector has strongly supported comprehensive immigration reform and guest worker programs, and opposed immigration restrictions. Second, businesses have the financial means to promote and encourage citizenship. Federal funding and leadership in a national citizenship program must be matched with private industry funding to help build the infrastructure necessary for a national effort.

Third, businesses with significant numbers of immigrants in their workforce provide an excellent conduit for citizenship outreach and public information, as well as space for citizenship classes and workshops. Given that 62 percent of low-wage immigrant workers have limited English proficiency,¹⁴ businesses can also subsidize worksite English classes to help their employees gain the language skills required for citizenship. Studies have shown that immigrants “who are fluent in oral and written English earn about 24 percent more than those who lack fluency, regardless of their qualifications.”¹⁵ A program by the U.S. Department of Education combining job training with language acquisition for employees resulted in decreased attendance problems, better production, increased job retention, and increased quality control.¹⁶ Clearly, worksite English classes are a win-win proposition for employers.

Finally, immigrants who are citizens will be more rooted in their community and more stable employees, so businesses should encourage citizenship out of self-interest. At the same time, citizenship is a way for businesses to invest in the wider community and promote civic engagement. Even businesses that do not have a significant immigrant workforce often have large numbers of immigrants as customers, and could benefit from supporting citizenship activities as a way of appealing to their customer base and improving their image. In addition, some businesses, such as banks, often emphasize civic engagement and philanthropy in the local community, and citizenship promotion complements such activities. Businesses that are owned by immigrants or their children, in particular, would be well positioned to support citizenship activities.

There are several examples of businesses that promote or encourage citizenship for their employees, mainly through English classes. In Baltimore, Md., Trifinity Manufacturing, a company that makes air fresheners, offers on-site English classes in partnership with Baltimore City Community College (BCCC). The company, formerly known as Medo, has sponsored this program since the early 1990s. BCCC pays for the instructors through a grant, and Trifinity pays employees half time to attend the classes. The classes are scheduled over an afternoon shift change so that employees can attend either at the beginning or end of their shifts. In past years, the company encouraged its employees to become citizens by offering citizenship preparation classes, reimbursing them for the cost of a naturalization application successfully completed, and honoring new citizen employees with a party. Over 30 employees successfully naturalized in this way. The company feels that the English and citizenship programs have paid for themselves many times over in terms of money saved on employee turnover. As a result of these programs, the company has an employee retention rate in the high 90s, loyal employees, and excellent morale.

Wegmans Food Markets, a chain based in Rochester, N.Y., with locations in Pennsylvania, New Jersey, Virginia, and Maryland, began offering English classes to its employees in 1999. The classes are conducted two times per week, and employees are paid to attend. At Wegmans' Sterling, Va., store, instructors from Northern Virginia Community College teach the basic level English classes, while a private company, called Wizard, provides higher level English classes that focus on pronunciation and conversation skills. The Sterling store has approximately 700 employees who speak 30 different languages. Wegmans views diversity in its staff as a strength, and places employees' language on their name tags to facilitate communication with customers who may speak the same language. The company decided to offer the English classes in response to the shortage of convenient, affordable classes in local communities and a desire to improve employee retention through better advancement opportunities. Wegmans found that it retains 80 percent of English class graduates. In addition, employees who complete the English classes are more comfortable interacting with customers. Wegmans views the English program as a worthwhile investment that greatly benefits the company as well as the employees. As a result of the company's education programs and other employee benefits, Wegmans was ranked number two on *Fortune* magazine's list of the "100 Best Companies to Work For" in 2006.

In Passaic, N.J., St. Mary's Hospital offers free, on-site English and citizenship preparation classes to its employees as well as the larger community. The hospital has a staff of nearly 800 and is a major employer in the city. For the English and citizenship program, the hospital pays for a program coordinator and secretary, and raises

\$6,000 per year from private donors to pay for the instructors. The program serves 60 students per year and partners with pro bono attorneys and Catholic Charities for document preparation and legal assistance with citizenship applications.

In Chicago, Ill., Mt. Sinai Hospital is collaborating with the Hebrew Immigrant Aid Society (HIAS) to conduct an assessment of employees' immigration and citizenship needs. HIAS is offering periodic open house sessions in the hospital cafeteria where employees can drop in to ask immigration questions. The needs assessment is funded by a private grant. Once the assessment is complete, HIAS hopes to offer citizenship classes and citizenship application assistance on site for hospital employees. In addition, HIAS hopes to provide information about citizenship in the hospital's orientation sessions for foreign-born nurses. The hospital views these services as a benefit that will improve retention of its foreign-born employees.

In Northern Virginia, the Fairfax County Office of Adult and Community Education has contracted with area employers, including restaurants, hotels, banks, construction companies, and landscapers to set up worksite English classes since the mid-1980s. The classes, which meet twice a week for 12 weeks, are customized for each employer's needs and focus on vocabulary required for the job. Employers pay the county for the classes, purchase any necessary books, and pay their employees to attend. Approximately 25 to 30 employers participate in the program each year. Employers who have participated have reported better employee morale, improved safety, and better communication skills on the part of employees.

Even businesses that do not have a large immigrant workforce can play a role in a national citizenship program by providing material support. In Phoenix, two major utility companies cosponsor citizenship workshops with Rep. Ed Pastor (D-N.M.) and provide space and food for the trainings for workshop volunteers. In 1997 Coors Brewing Company produced a free video, with copies available upon request, to assist immigrants in preparing for the U.S. history and civics test. The video featured the 96 citizenship study questions in Spanish and English.

RECOMMENDATIONS:

Citizenship Promotion:

- 1 Businesses with a significant number of immigrant employees should provide information about the benefits and requirements of citizenship and referrals to local nonprofit immigration service agencies for application assistance.
- 2 Businesses should encourage citizenship by reimbursing employees for the cost of a successful naturalization application and should foster pride in new

citizens through parties for newly naturalized employees and other forms of recognition.

- 3 Businesses should distribute materials such as brochures, flash cards, videos, and CDs from the Office of Citizenship (OoC) and charitable immigration programs to inform immigrants about the benefits of citizenship and assist them in preparing for the test.
- 4 Ethnic-based Chambers of Commerce should take a leadership role in promoting citizenship among their members by sponsoring events, providing funding, and featuring activities and projects on their websites, in their publications, and at their national conferences.
- 5 Businesses should be approached through networks such as trade associations and regional consortiums to support a national citizenship program. Corporate foundations and industry-wide educational foundations should also be approached to assist in recruiting employers.
- 6 Federal, state, and local governments should provide tax credits to businesses that offer on-site English or citizenship classes for their employees.
- 7 National and local trade associations should promote citizenship by featuring businesses involved in citizenship activities in their publications, on their websites, and at conferences.
- 8 Government and national and local trade associations should publicly recognize and encourage businesses involved in citizenship activities through special awards for best programs and practices.
- 9 Businesses that support philanthropic activities and are frustrated with the lack of government leadership on citizenship issues should support citizenship initiatives in their local communities. Such citizenship initiatives have many benefits for businesses: they are nonpartisan, they offer many “feel good,” human interest stories, and they have clear and positive outcomes for individuals and communities.

Programs:

- 10 Businesses with a significant number of immigrant employees should offer worksite English language and citizenship classes, paying for employees’ time to attend classes, for the instructor, and for textbooks.
- 11 Businesses should encourage employees who are citizens to volunteer their time to help immigrants going through the naturalization process, especially other employees, by tutoring them in English and civics and providing other kinds of support. They should offer time off for employees who are naturalizing and for those mentoring them to attend citizenship appointments and the swearing-in ceremony. Citizenship-related activities should be included in business volunteer programs.

Partnerships:

- 12 Local mainstream and ethnic-based Chambers of Commerce should encourage employers to provide worksite English and citizenship classes in partnership with community-based organizations.
- 13 The OoC and the Office of Refugee Resettlement should assist in recruiting businesses for worksite English and citizenship classes and for support of citizenship services in the broader community.
- 14 Businesses with a significant number of employees eligible for citizenship should partner with local nonprofit immigration service agencies to offer application assistance through on-site citizenship workshops.
- 15 Large businesses should partner with nonprofit immigration service agencies to lend their expertise and assistance in marketing citizenship, messaging, and advertising citizenship services to the community.
- 16 Local charitable immigration programs should utilize business consultants who specialize in corporate development to assist in recruiting employers to participate in citizenship activities.
- 17 Small businesses that wish to participate in citizenship activities should form a consortium to pool their resources.
- 18 Business leaders, especially those who are immigrants or children of immigrants, should serve on an advisory council for the OoC to assist in recruiting businesses to participate in citizenship activities and to advise on marketing a national citizenship plan to immigrants and the general public.

Funding:

- 19 Businesses such as utility companies that are large, highly profitable, and serve the vast majority of the community, including immigrants, should provide financial and staff support for citizenship workshops. Workshop organizers can give them the opportunity to advertise and set up vending tables at workshops in exchange for their support.
- 20 Businesses that sponsor philanthropic activities should make citizenship and English language training a priority and fund the work of both local and national nonprofit immigration service agencies.
- 21 Businesses should sponsor celebrations at citizenship swearing-in ceremonies.
- 22 Local charitable immigration programs should establish roundtables of wealthy business investors to fund citizenship initiatives in their community.
- 23 Businesses should provide financial support for a national Ad Council campaign promoting citizenship.

- 1 National Immigration Law Center. "Facts About Immigrant Workers" (April 2004), available at: <http://www.nilc.org>
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- 3 National Immigration Law Center. "Facts About Immigrant Workers," para. 6.
- 4 Migration Policy Institute. "What Kind of Work Do Immigrants Do?" (January 2004), available at: <http://www.migrationpolicy.org/pubs/2004.php>
- 5 Catholic Legal Immigration Network, Inc. *Work Without Justice: Low-Wage Immigrant Laborers* (Washington, DC: Catholic Legal Immigration Network, Inc., 2000).
- 6 Migration Policy Institute. "The Foreign Born in the U.S. Labor Force: Numbers and Trends" (January 2004), available at: <http://www.migrationpolicy.org/pubs/2004.php>
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- 8 Center on Budget and Policy Priorities. "The Number of Uninsured Americans Continued to Rise in 2004" (August 30, 2005), available at: <http://www.cbpp.org/8-30-05health.htm>
- 9 United States Hispanic Chamber of Commerce. "Statistics," available at: <http://www.usbcc.com/res-statistics.html>
- 10 Williams, K. and Kang, C. "Study Shows Increase in Hispanic Entrepreneurship" *The Washington Post* (March 21, 2006), para. 1.
- 11 U.S. Pan Asian American Chamber of Commerce. "AA Facts and Statistics," available at: http://www.uspaacc.com/web/aboutus/aa_facts.htm
- 12 United States Hispanic Chamber of Commerce. *Ibid.*
- 13 U.S. Pan Asian American Chamber of Commerce. *Ibid.*
- 14 National Immigration Law Center. "Facts About Immigrant Workers."
- 15 *Ibid.*, para. 17.
- 16 *Ibid.*

Labor Unions

Labor unions play a key role in U.S. economic, social, and political life. Through the use of collective bargaining, unions gain benefits for workers, such as higher wages, health insurance, pensions, and safer working conditions. According to the U.S. Department of Labor, union members have wages an average of 27 percent higher than non-union members, and 92 percent of union members have health coverage through their jobs, compared to 68 percent of non-union members. In addition, 73 percent of union members have a guaranteed, defined benefit pension, while only 16 percent of non-union members do.¹

By organizing and mobilizing their members and supporters in the labor movement, unions have helped improve the standard of living for U.S. society at large. They are credited with ending child labor, improving worker safety, increasing wages for both union and non-union members, reducing the number of hours in the work week, and winning public education for children, along with many other benefits.² Unions pushed for the creation of the Department of Labor in 1913 to protect the rights and welfare of all U.S. laborers, and union leaders proposed the Labor Day holiday, established by Congress in 1894 to celebrate the U.S. worker. Unions are largely responsible for the rise of the middle class in America through their success in negotiating stable, middle-class incomes for workers.

The number of labor unions in the United States began increasing in the mid-nineteenth century with the country's industrialization and peaked in the 1950s, when 30 percent of workers were union members. In the later half of the twentieth century, union membership declined, and by 2000 only 12 percent of U.S. workers belonged to unions.³ In addition to the number of members, the demographics of unions have changed significantly. Over the last 20 years, "women have made up the majority of new workers organized, and union growth has been significantly higher among workers of color and immigrant workers than among white male workers."⁴ The increase in immigrant union members reflects a larger trend in the U.S. labor market. Immigrants are now crucial participants and half of the workers who entered the U.S. labor force during the 1990s were immigrants.⁵ Another change experienced by unions has been in the types of jobs held by their members. With the decline of manufacturing jobs in the United States, more union members hold jobs in healthcare, restaurants, hotels, and other areas of the service sector.

In a national citizenship program, labor unions would play an important role. Because many unions have large numbers of immigrant members, they would be an excellent vehicle for outreach and citizenship application assistance by attorneys. Unions offer other unique strengths. Unlike nonprofit organizations that depend on grants and donations for their programs, some unions have existing financial resources that could be allocated to a citizenship program. Unions also have a firmly established member base and extensive experience in reaching out to their members, which could be utilized for citizenship promotion. In addition, unions are in a good position to negotiate citizenship-related benefits in the work place, such as English language classes.

In recognition of their immigrant members and issues of importance to them, many unions are already actively engaged in the movement for comprehensive immigration reform. Citizenship progresses naturally from immigration reform, which emphasizes lawful permanent residence, and

citizenship programs would increase the effectiveness of union advocacy by creating more voters. Citizenship also furthers the broad goals and objectives of unions to improve the lives of their members by giving them the right to vote and other rights and benefits of full membership in U.S. society. As more unions focus their efforts on organizing and recruiting new members, citizenship assistance can be another important benefit of union membership.

Some labor unions are already involved in citizenship-related activities. In New York City, the Service Employees International Union (SEIU) Local 1199 has an extensive citizenship program for its 250,000 members and their dependents. Citizenship assistance is a negotiated benefit in the union's contract with employers. The SEIU program, which began in 2001, grew from recognition of the need for workers to be able to vote on issues of importance to them and to have holistic benefits. It provides outreach, citizenship application assistance and legal advice, and English language classes. One to two times per month, the program conducts citizenship workshops led by attorneys and representatives accredited by the Board of Immigration Appeals and drawing 30 to 40 applicants each. It also partners with other New York organizations for citizenship drives, case referrals, and citizenship policy advocacy. Another New York union, the American Federation of State, County, and Municipal Employees (AFSCME) DC 37, provides citizenship application assistance as part of an extensive menu of legal services available as a benefit to members.

In California, SEIU United Healthcare Workers-West, a statewide union with 150,000 members, has been providing citizenship outreach and assistance to its members and their families for the last three years. The citizenship program is housed within the union's education and training department and is supported by member dues. It is one of the union's least expensive programs. The union decided to start the program several years ago because it had a large number of immigrant members who often contacted the union seeking citizenship or immigration assistance. The citizenship program was seen as a way of strengthening the union's connection with members. Through the program, the union provides regularly scheduled, two-hour citizenship information sessions to educate members about the citizenship requirements and process. Attendees complete their own citizenship applications during the sessions and are screened and referred to the Immigrant Legal Resource Center if they have any eligibility problems. They are referred to English and citizenship classes in the community if needed. The union also provides a four-hour citizenship refresher course to prepare those with pending applications for the interview. The union informs its members about the citizenship program and course schedule through flyers, its website, and its quarterly magazine.

RECOMMENDATIONS:

- 1 Unions should conduct outreach to their members on the benefits and requirements of citizenship and where to obtain application assistance.
- 2 Unions should offer citizenship application assistance, with attorney support or via community-based immigration programs, and English language classes as a benefit for their members.
- 3 Unions should partner with charitable immigration legal service providers to organize citizenship drives and workshops for their members and others in the community.
- 4 Unions should negotiate with employers to establish worksite English language and citizenship preparation classes.
- 5 Unions should partner with English as a second language (ESL) providers as needed to organize English and citizenship classes at worksites and other convenient locations.
- 6 Unions that provide citizenship application assistance should partner with immigration legal service providers to advocate with United States Citizenship and Immigration Services on policy issues of mutual concern.
- 7 Union national offices should promote citizenship assistance models at their conferences and meetings with local members and provide technical assistance to unions interested in starting citizenship programs.
- 8 Unions that organize immigrants to advocate for immigration reform should promote citizenship as a means to full political participation for their members.

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 - 2 Wikipedia: The Free Encyclopedia. "Labor Unions in the United States," available at: http://en.wikipedia.org/wiki/Labor_unions
 - 3 Ibid.
 - 4 Ibid, para. 3.
 - 5 Urban Institute. "Immigration Studies: A Program of the Urban Institute," available at: <http://www.urban.org/toolkit/issues/immigration.cfm>

COMMENTARIES¹

Preparing Naturalization Applicants for Active and Effective Civic Participation

By **Edward Kisam**
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A broad spectrum of organizations, including both immigrant advocate groups and mainstream civic organizations, now believe the naturalization process should be more than a legal transition from residency to citizenship status. The view that programs should foster genuine civic engagement and, thereby, expand opportunities for new Americans to have a voice in local, state, and federal decision-making is one most of us share. But there has, to date, not been adequate attention to strategies for doing this. I argue that the first steps toward fulfilling the dream of preparing naturalization applicants for civic participation will be for educators, immigrant advocacy groups, and legal service providers to go beyond the basics, and build immigrant civic participation on the solid foundation of immigrants' experiences in the complex social networks that are a universal feature of human society.

Learning About Voice in a Democratic Society

Ironically, some of the richest conceptualizations of "voice" in democratic society come from dispassionate political scientists and sociologists (e.g. Verba, Scholzman, and Brady, 1995), while the imagination of progressives has been derailed by an understandable but short-sighted focus on the centrality of the ritual of voting as the primary pathway toward immigrant empowerment.

In contemporary America, one vote is not nearly as important as one genuine, passionate voice. As part of civic skills instruction, naturalization programs must provide their clients ample opportunities to reflect on their experiences, formulate and articulate their perspectives and opinions, and persuade others to listen to their points of view and, in matters of civic decision-making, come around to their point of view.

It is crucial for immigrants (especially those, like the Mexican farmworkers with whom I work, who have little schooling) to learn that one's own unique experiences are a valuable resource for participation in civic dialogue. For many, the proposition that we all know enough to have our say will be a radical but useful new concept. Classroom and program exercises involving naturalization applicants

in talking about personally important life experiences and perspectives can begin not only to build the foundation for active participation in civic dialogue but also strengthen self-confidence in interacting with people who "are coming from a different place" (such as USCIS adjudicators, nonimmigrant neighbors, and elected officials). What better basis could there be for actively participating in the now-burgeoning national political debate about the cost of migration (now dominated by anti-immigrant voices) than for immigrants to share with others painful experiences of crossing the Sonoran desert in excruciating heat? What better basis for discussion about expedient politicians (such as the governors of California, New Mexico, and Arizona) who seek to focus public dialogue on fiscal policy and, thereby, ignore the human tragedies of border enforcement strategy? What better basis for participation in local school board politics than for parents to compare and contrast their experiences with their children's good or bad teachers, or their own struggles in learning a new language? Or discussing experiences finding decent affordable housing, as a basis for getting involved in municipal government decisions?

Learning about the Power of Voices Joined Together

One single passionate voice sharing individual experiences, presenting a unique, novel perspective, explaining the realities of immigrants' lives in a nation riddled with inequities, countering opponents' misrepresentations of immigrants' lives, persuading fair-minded neighbors to stand up for immigrants' interests as well as their own, is worth 1,000 votes. An affiliational network of immigrants who have come together to address a common concern, promote a shared policy or legislative agenda, or persuade one or several elected or appointed officials to change their position can be worth 10,000 votes. Naturalization programs can and should stress how important organizational participation is as part of contemporary democracy. Not surprisingly, most immigrants are unfamiliar with the specific organizational landscape of the United States. Citizenship preparation must help immigrants understand how their own organizations (e.g. hometown associations/*clubes de oriundos*), labor unions, neighborhood associations, local membership organizations (such as the PTA) or national ones (such as AARP), and professional groups (such as the American Immigration Lawyers Association) play a crucial role in determining actual political outcomes in contemporary politics. If naturalization curriculum focuses only on voting, we will have unwittingly promoted a vision and practice of second-class citizenship and minimal civic participation.

Another important aspect of immigrants' learning about civic voice is that financial contributions, at the very least, amplify one's voice. Most naturalization applicants are poor but not so poor they can afford to ignore the need to assess and choose among competing candidates for elective office and contribute to those who share their concerns or who, at least, are willing to listen to their views. Contributions can be financial or in-kind, working as a volunteer in a campaign—either oriented toward promoting a cause (e.g. the DREAM Act) or a candidate. In the current environment in which money buys air time and the most loudly heard voices are those with access to air time, immigrants can honestly be told that financial or in-kind participation in democratic dialogue is part of one's civic duty.

Active Listening as Part of Civic Dialogue

American civic dialogue is exclusive in that a broad range of crucial decisions about social programs, taxes, and regulatory policy are highly technical and jargon-filled. The media have become, inevitably, the interpreters of arcane in-group babble, which substitutes for supposedly public discourse about civic life. In addition to stressing self-expression and participation in affiliational networks and organizations, naturalization programs must stress media awareness as being a necessary part of effective civic participation. Language is often a barrier but, happily, ethnic media outlets are growing rapidly throughout the United States. Part of this introduction to U.S. civic discourse must also include at least an orientation to media bias and the necessity of comparing and contrasting divergent arguments and representations of current realities (e.g. Hurricane Katrina, the war in Iraq, immigration policy) and what's really going on in civic life. Naturalization applicants, no less than native-born U.S. citizens, have had ample experience with hypocrisy, dissimulation, misrepresentation, and shading of the truth. Building the skills for effective civic participation requires programs to provide their participants with opportunities for critical analysis, building on their personal experience to understand the intricacies and dysfunctional aspects of civic and political dialogue in the United States.

Conclusion

Naturalization programs can and must find the time to introduce their clients to the real nitty-gritty world of American civic and political life, to the jungle in which an extraordinary range of individuals and special interest groups vie to make their voices heard and to have their agendas prevail. The hope that an appeal for civic engagement simply as a duty of citizenship will actually result in immigrants' actively and effectively participating in civic

life is a vain one, especially when democratic participation is visualized as the miracle of one voice in the voting booth making a difference.

Successful civic skills-building requires practice with different modes of civic participation, particularly those related to analytic thinking and effective communication. Naturalization programs and ESL-civics classrooms can be turned into prototypes of communities in which clients practice reflection, self-expression, negotiating, persuading, active listening, and critical thinking. This does take time, energy, and creativity on the part of service providers but this sort of effort will build naturalization applicants' self-confidence and communication skills to succeed in the USCIS oral interview process as well as providing them the foundations for making a difference in civic dialogue and political outcomes—both locally and nationally.

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From the Oath of Citizenship to the Oath of Office

By Ann Morse

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One hundred years ago, when a flood of immigrants came to the United States seeking economic opportunity and political freedom, the country undertook a broad-based campaign to reinforce America's national identity by assimilating the new arrivals. Under the "Americanization" movement, state and federal governments, social clubs, labor unions, and businesses all launched programs to instill the American values of liberty, democracy, and equal opportunity in the newest residents.

Today, with immigration levels approaching those of the 1900s, public leaders are again seeking ways to encourage the civic incorporation of America's newcomers. In its 1997 report, *Becoming an American: Immigration and Immigrant Policy*, the U.S. Commission on Immigration Reform reiterated its call for a renewed commitment to civic education and civic responsibility for immigrants in America. In 2005 USCIS launched a national campaign to encourage foreign-born residents to learn about their rights and responsibilities.

At the state level, legislators have long been active in encouraging Americans to vote, to engage in public policy, to understand the principles of our representative democracy, and to put them to the test. Legislators also have been

working with America's newcomers, encouraging immigrants to become responsible citizens in our democratic system by naturalizing and becoming registered voters.

A number of immigrants have gone even farther by running for office and getting elected to represent the people of their state. At least 79 state legislators have immigrated to the United States from 32 different countries. They hail from Austria, Azores, Bahamas, British West Indies, Canada, Cape Verde Islands, China, Colombia, Cuba, Dominican Republic, El Salvador, United Kingdom (England), France, Germany, Greece, Haiti, Hungary, India, Italy, Japan, Korea, Laos, Lebanon, Panama, Peru, Philippines, Portugal, Scotland, Spain, Thailand, Vietnam, and the West Indies.

Providing a Public Service

The concept of public service is not new to many of our newest citizens. Illinois state Sen. Adeline Geo-Karis, for example, has been a dedicated public servant for most of her life. Born in Greece in 1918, she served in the U.S. Naval Reserve, as justice of the peace, assistant state attorney, and mayor before running for the state legislature, where she has now served for 32 years. What motivated her to run for office? The energy crisis of the 1970s and the need to support home-grown solutions such as ethanol and gasohol. Sen. Geo-Karis strongly believes immigrants should naturalize and vote: "I'm an immigrant myself," she says, "and once you're a citizen, you have a precious right to vote, and it must be used."

"Immigrants should be an asset to the community, and they should not sit on the sidelines," says state Rep. Selim Noujaim of Connecticut. An immigrant from Lebanon, he came to the United States after falling in love with an American woman. Although he spoke no English when he arrived, he became a successful businessman and active member of his community. In 2002 he won election to the legislature with the goal of helping businesses and protecting seniors. Most recently, he has helped a new Albanian community become acclimated and self-sufficient. He says: "The best way for immigrants to thrive is not to give them a handout but to help them help themselves."

A desire for better education for her children led state Rep. Swati Dandekar to overcome her reluctance to enter politics. Born in India, she moved to Iowa in 1973 to join her husband, and finally decided to run for the school board. "We live in a global economy, and need a strong curriculum," she says. She was elected to the Iowa statehouse in 2002 and says civic education has become even more important to her. Despite a tight legislative budget, she helped pass unanimous legislation for Iowa's first Asian-American Commission. The law created a public-private partnership with public funds for staff time and an office, and a nonprofit foundation to develop private support with

commitment from the business community. Minorities from across the state now ask her how they can become involved in politics and become a part of the process.

Learning about Democracy

Becoming involved in the political process is not necessarily easy for immigrants and refugees. The members of these communities face special challenges, one of which can be a lack of knowledge about how a democracy works. Political systems in their country of origin may be completely different or even the cause of their emigration. And after their arrival in the United States, immigrants may face isolation, dislocation, cultural and language barriers, and lack of knowledge or access to civic engagement and direct political participation.

This political disconnect can hold immigrant communities back from achieving integration. Refugee communities in the United States often fail to participate in politics because of a fear of government, an unwillingness to voice concerns or make additional requests of the country that has welcomed them, or time constraints and the economic challenges of earning a living. Many refugees and immigrants also remain confused about the roles and responsibilities of each level of government—federal, state, and local—in the United States.

State legislators are helping to bridge this gap by educating their fellow citizens that public decisions on such issues as education, transportation, and budgets directly affect their lives. Rep. Hoon-Yung Hopgood of Michigan is constantly on the road encouraging Asian-Pacific Americans to become more active in civic life. Adopted from Korea when he was 19 months old, he grew up in a political family and decided to run for public office himself. "Immigrant communities often feel overlooked and under-represented," he observes. He tries to help them make the connections between their lives and what government does, and to teach young people how to become a candidate for public office.

Virginia state Sen. Jeannemarie Devolites represents a diverse immigrant district in Fairfax, Va. An immigrant herself by virtue of being born on an Air Force base in England of immigrant parents, she recognizes the need for immigrants to organize themselves and develop strong leaders. With limited resources to effectively reach the diverse, multilingual communities in Fairfax, it is even more important to have community leaders embrace civic education and build bridges with elected representatives. "We need to do a better job of encouraging citizenship and involvement in government—that would be a giant step in the right direction," she says.

Lessons from the Capitol

Many new Americans learn about their rights and responsibilities through hands-on activities at their state legislatures. Legislators sponsor and welcome citizens' visits to the state capitol, and offer an opportunity to see firsthand how the U.S. political system works.

California Assemblyman Leland Yee believes the best way for elected officials to understand the immigrant community is to reach out and invite immigrants to be part of the legislative staff. It is also important for legislators to participate in the social events, political events, and cultural events of the ethnic communities they represent, and to take the time to understand the culture, he says.

Reflecting on how he came to politics, Assemblyman Yee says, "I come from a generation where politics was not something one aspired to do." An immigrant from China, he became the first Asian-Pacific American to be appointed speaker pro tempore in California, in 2004. The immigrant community has very little faith in the system, he says, and tends not to participate. However, the responsibility falls on the immigrant community to realize the stakes: This is their tax money, the education of their children, their quality of life, and their children's future. "To take control of that," he says, "you must get involved: Become a citizen, vote, support candidates, and run for office."

"Move out of your comfort zone," advises Delegate Ana Sol Gutierrez of Maryland, "and meet your constituents where they live." Originally from El Salvador, she served eight years on her local school board, aiming to improve education for the changing student population before deciding that even more important decisions were made at the state level. She tries to give political voice to her ethnically and racially diverse district through culturally sensitive old-style campaigning—voter registration, voter education, and outreach. By walking the neighborhoods and running targeted campaigns directed at both Latino and mainstream communities, she hopes to support newcomer political involvement in a safe and welcoming way. Constant communication, through Latino media outlets, nonprofits, and town meetings, and focusing on the community's priorities, she believes, will help accomplish results and encourage future political participation.

Building the New American Community, a project of the National Conference of State Legislatures (NCSL), offers these ideas for building communication between newcomer communities and state legislators:

- Policymakers can be invited to community events organized by immigrants to meet with their local constituents;
- Immigrants can create partnerships with other community organizations and collaborate for needed changes in legislation or regulation;
- Immigrants can provide information on their community to the legislators who represent their homes, businesses, or community center and organizations;
- Immigrants can identify and publicize examples of their economic and social contributions in the community;
- Government and immigrant groups can develop brochures and guides on state and local government leadership (who they are, what they do, and how to voice concerns to them); and
- Government and immigrant groups can develop ways to support internships at the statehouse for refugee and immigrant communities so young leaders can learn how political and policy processes function.

Because of their experiences in bringing minority communities into the mainstream, legislators in immigrant families can bring new perspectives and new solutions to the legislature. The uniquely American approach to national identity through commitment to democratic ideals continues to make this country one of the most successful multiethnic nations in history. Our state legislatures reflect the changing face of America, encouraging citizenship and civic responsibility for both new immigrants and old.

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Patriotic Integration is the Key to Successful Immigration

By **John Fonte**

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Our nation cannot have a serious immigration policy without an equally serious assimilation policy (the terms assimilation and integration will be used interchangeably in this essay). The United States of America is the most successful immigration country in the history of the world because of the triumph of patriotic integration—the assimilation of immigrants as loyal members of the American body politic.

For more than 200 years immigrants to America and their children have successfully assimilated into what has been called, the “American way of life.” The patriotic integration of immigrants into the American democratic republic did not happen “naturally.” It was the result of a long-range vision formulated by America’s leaders during our earliest days.

President George Washington wrote his vice president, John Adams, that he envisioned immigrants becoming “assimilated to our customs, measures, laws,” and because of this, he predicted, native-born citizens and immigrants would “soon become one people.” In the 1790s the Congress established the Oath of Renunciation and Allegiance requiring naturalized citizens to “absolutely and entirely renounce” all allegiance to their former nations.

More than a century later, President Theodore Roosevelt stated that, “the immigrant who comes here in good faith [and] becomes an American and assimilates himself to us... shall be treated on an exact equality with everyone else, for it is an outrage to discriminate against any such man because of creed or birthplace or origin. But that is predicated upon the man’s becoming an American and nothing but an American... There can be no divided allegiance here. Any man who says he is an American, but something else also, isn’t an American at all.” About ten years ago, the late Congresswoman Barbara Jordan called for a vigorous new “Americanization” initiative.

What is patriotic integration? First let us review the different forms of integration or assimilation. Linguistic integration means the immigrant learns English. Economic integration means the immigrant does well materially and, perhaps, joins the middle class. Cultural integration means that the immigrant acculturates to the nation’s cultural norms and popular customs (for both good and ill).

These forms of integration are necessary, but not sufficient for successful assimilation. We have learned in recent years that there are naturalized citizens who speak good English, are economically successful, are fans of American films, and, at the same, send money to terrorists who seek to kill Americans. At the end of the day, exclusive political loyalty and an emotional attachment to the American nation are required for complete assimilation.

What about “civic integration,” which seems to be the concept de jour? Civic integration presumably means that the immigrant is integrated into our democratic political system, votes, pays taxes, obeys the law, and participates in public life in some fashion. I am sorry, but there is something rather tepid about the term, and something rather ambiguous about the concept of civic integration. It is a weasel word. It is employed because something more meaningful—loyalty, allegiance, patriotism—might not be considered in good taste in some circles, just as a serious cleric exploring the distinction between heaven and hell might draw smirks and snickers from those same circles and for those same reasons (the embarrassment of the overly sophisticated when confronted with foundational beliefs like patriotism and religion).

Theodore Roosevelt did not talk about civic integration, he talked about “Americanization” and patriotism, and we should talk about patriotic, not civic, integration. Patriotic integration means that the immigrant has transferred sole political loyalty to the United States and is (as the Immigration and Nationality Act requires) “well disposed to the good order and happiness of the United States”—that is to say, emotionally attached to the nation in the affective sense. James Madison in *Federalist 49* explains why a nation needs affective (as well as rational and normative) support in order to survive.

What Policies Should Be Enacted to Promote Patriotic Integration?

Sen. Lamar Alexander of Tennessee has introduced legislation “to promote the patriotic integration of prospective citizens into the American way of life by providing civics, history, and English as a second language courses.” There is a “specific emphasis” on “attachment to the principles of the Constitution” and to the “heroes of American history (including military heroes).” This initiative will be administered by the Office of Citizenship in the U.S. Citizenship and Immigration Services (USCIS). Most importantly, the Alexander bill incorporates “a knowledge and understanding of the Oath of Allegiance into the history and government test given to applicants for citizenship.”

It is vitally important for new citizens to understand the Oath of Allegiance and exactly what occurs when one takes this oath. The oath is crucial to the naturalization process because of the kind of country that we are: We are a nation built not on race, ethnicity, or religion, but on political allegiance to American democracy. Hence, political loyalty is central to our regime.

The oath begins, “I absolutely and entirely renounce” all “allegiance and fidelity” to any former sovereignty “of whom or which I have heretofore been a subject or citizen.”

In taking the oath the immigrant is transferring political allegiance from his or her birth nation to the United States of America. He or she is leaving a previous “people” and joining the American people. This “transfer of allegiance” from one nation to another must be thoroughly explained to immigrants seeking citizenship by the federal officials in charge of naturalization in the same way that candidates for confirmation in the Catholic Church are taught the significance and meaning of the Apostles Creed and the Nicene Creed. It must be a central part of the citizenship test. This is the heart of patriotic integration.

The history and government test should pose meaningful questions and eliminate some of the trivia questions such as: What is the USCIS form number that one needs to apply for citizenship? The test could be kept at the current third-fourth grade level and almost all immigrants who seriously study for it should be able to pass the exam.

The overall goal of the Office of Citizenship should not be quantity (increasing the rates of naturalization), but quality, strengthening patriotic integration for all newcomers who voluntarily decide to transfer their political allegiance to the United States. Indeed, strengthening patriotic integration should not be simply of interest to social conservatives but to all Americans who are serious about the future of our country.

Effective Integration Requires Citizenship

By **Edwin B. Silverman**

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We are living in extraordinary times, on the verge of a new world order. At the heart of the emergent changes is global migration. According to the United Nations, there are more than 180 million migrants—49 percent women—seeking a better life. As a consequence, the host nation and the migrants themselves face extraordinary economic, social, and cultural challenges, and integration of the migrants has become a prominent, critical subject of trans-global inquiry.

Of late, the failure of European nations to deal upfront with the implications of migration has boiled to the surface. France, which has the largest concentration of migrants in Europe, has been the stage for riots. Its immigrants have been marginalized, live in suburbs removed from the mainstream populace, and are victims of racism and poverty. The youth unemployment rate is 40 percent.

Similarly, in Germany, which has a national unemployment rate of 10 percent, the Turkish unemployment rate is 40 percent. In addition to the cultural and religious differences, the German populace looks unkindly upon the Turks for their heavy use of a relatively generous system of welfare benefits. The United Nations High Commission on Human Rights has established the Working Group on Development, which serves to highlight a parallel between the needs of underdeveloped nations and the Committee on Migrant Workers. The Declaration on the Right to Development follows on the Articles of the 1948 Universal Declaration of Human Rights. The right to development is an inalienable human right by virtue of which every human is entitled to participate in, contribute to, and enjoy economic, social, cultural, and political conditions, through which all human rights and fundamental freedoms can be fully realized. It is the responsibility of governments to create circumstances favorable to the realization of the rights of migrant workers.

Needless to say, the effort to actualize the rights of migrant workers and address the circumstance of global migration is a struggle in progress. Global migration is a fact, is irreversible, and will continue to increase. At best it will take several generations to approximate the United Nation’s ideals. It will take intensive education for those in denial who long for the days of cultural homogeneity long past. Further, it requires that national and local governments carefully examine ways in which to promote inclusion and integration of both invited and uninvited immigrants into the fabric of the community, including the right of citizenship.

Clearly, the United States, which has 18 percent of global migrants, is years ahead of European and other nations in providing an environment with the opportunity for immigrants to flourish. At the same time, the laissez-faire attitude of Congress, state legislatures, and city councils is no longer acceptable, insofar as the racial, religious, and educational character of the newest Americans, especially those at the lower income sector of the immigration “hour-glass,” cries out for more thoughtful, proactive efforts to expedite integration. Currently, one in nine residents is foreign born, one in five children is the child of immigrants, and one in two new workers is an immigrant. These dimensions have implications that reach to the core of our future as a nation, and these dimensions will grow.

What have we learned in our history as a nation of immigrants that can lead us to a bright future? Without question the opportunity to work and own businesses and homes is more readily available in America than in most nations. Economic self-sufficiency is a necessity of survival, but in itself does not speak to integration. The requisites for full integration are English language, citizenship, and civic participation. Moreover, as we know, it is the children of immigrants that fully enjoy the fruits of immigration. As the adults struggle to learn English and achieve economic viability, the children call out for adult role models that illustrate the importance of citizenship and civic participation. The children of immigrants are 20 percent of the K-12 population and the number is growing. What can be more important than preparing them for constructive participation in our communities?

The traditional vehicles for integration—the promotion of English language, citizenship, and civic participation—have been the churches, schools, unions, and community-based service providers. All are currently challenged by their respective circumstances, and overall limitations in funding. It is essential that government step forward in support of English language training and citizenship in particular, as well as addressing other government responsibilities, such as enforcement of worker rights, Title VI of the Civil Rights Act barring discrimination based on national origin and, when needed, provision of interpreters in healthcare. Enabling immigrant social mobility and inclusion requires full public-private partnerships.

Illinois has been a leader among state governments in taking a thoughtful, proactive approach to immigrant integration. The Refugee and Immigrant Citizenship Initiative (RICI) is now ten years old. RICI has prepared more than 130,000 immigrants for citizenship, two-thirds of whom have had less than a high school education, 20 percent of whom were senior citizens. After this network of mainly ethnic community-based organizations began their work, naturalizations in the USCIS Chicago District Office (formerly INS) doubled, from an average of 17,000 per year to approximately 40,000 per year. When RICI produced a state demography of immigrants by legislative district, the state legislature took notice. Immigration, long considered a city of Chicago phenomenon and, therefore, a Democratic Party issue, became a bipartisan issue. Naturalization has meant more than 600,000 new voters in Illinois, and with that potency the opportunity for influencing governmental policy. A recent study by Public Agenda reports that 76 percent of immigrants surveyed said they wanted citizenship so they could vote. In the words of one Jordanian: “I want to make a difference.”

A case in point, Illinois like most other states has faced serious budget deficits in the last three years, the worst deficits in state history. Most programs experienced reductions. Immigrant services administered by the Illinois

Department of Human Services, which include RICI, increased from \$5 million to \$8.26 million in the last two years largely due to well-orchestrated, thoughtful lobbying by masses of new immigrant voters. Further, the new immigrant vote helped elect Gov. Rod Blagojevich, a son of immigrants and the first Democratic governor in Illinois in almost 30 years.

In Illinois the citizenship initiative has galvanized community empowerment of ethnic organizations that advocate for their constituencies and have become active in seeking betterment of the community at large. Clearly issues like affordable housing, effective schools, and accessible healthcare also impact the general public. The Coalition of Asian, African, European, and Latino Immigrants of Illinois (CAELII) is a grassroots network devoted to promotion of civic participation. One particularly effective initiative has been Active Citizens Technology in Our Neighborhoods (ACTION). It involves computer training for individuals with lower literacy and has enabled the trainees to access information. In one instance, it enabled an immigrant family to communicate with a son in Iraq.

Community empowerment laid the foundation for the Illinois Coalition for Immigrant and Refugee Rights (ICIRR), now an umbrella for more than 130 community-based organizations. The coalition administers the New Americans Initiative, designed to increase access to naturalization, and also an Outreach and Interpretation Project, providing support for limited-English persons in 40 languages. Fred Tsao, ICIRR policy director, has closely monitored efforts by the Office of Citizenship to revise the citizenship examination, and has been instrumental in the office’s scrapping its first, rather miserable test design.

There is much more than can be said, but to close, progress in Illinois in program and policy development and analyses has stemmed from citizenship and the resultant capacity for community empowerment. In many ways, immigrants, who must earn their citizenship, are more patriotic, loyal, and civically involved than many native-born Americans, who take the rights and privileges of living in this country for granted. The journey of immigrants requires great courage and perseverance. They leave behind friends, family, and all that they know, and venture into a new society. The culmination of the journey is citizenship, a commitment to democratic ideals and constitutional principles. If you have not, attend a naturalization ceremony and experience the pride, patriotism, joy, and multicultural diversity that is uniquely American. It is America at its best.

Justice Denied: Inadequate Legal Aid for Low-Income Persons in the United States

By Robert J. Rhudy

Legal Services Consultant, Attorney, and Mediator

It is very difficult to gain effective access to justice in the United States for many civil matters without the assistance of an attorney, and persons are not likely to receive legal assistance for most civil matters unless they are able to pay a substantial fee. For a country that proclaims “equal justice for all,” this is shameful. Many other comparably developed countries do a much better job of publicly funding legal aid for low to moderate-income persons in civil matters, including providing legal assistance to noncitizens for immigration, naturalization, citizenship, and other critical legal issues.

While numerous states have increased public funding for legal aid over the past several years, other states (generally with the largest proportional poverty and immigrant populations) have not kept pace, and federal funding for legal aid is less than half its level of 1981 when adjusted for inflation and increases in the low-income population. Federal legal aid is very restricted on services for noncitizens, and such persons receive a low priority for state legal aid resources, with the result that essential services for noncitizens must generally be provided by programs using very limited private contributions.

Federal and state governments need to substantially increase funding for civil legal aid if commitments of “access to justice” and “equal justice for all” are to be other than empty phrases. Acknowledging the multiple barriers confronting many noncitizens in the United States, federal and state governments should eliminate the restrictions and limitations on providing legal aid to noncitizens to help expedite citizenship and address other critical civil legal needs for this population.

Legal Aid Funding

Federal funding for civil legal services for low-income persons began in the United States in 1965 under the Office of Economic Opportunity as part of the Johnson Administration’s War on Poverty. Following several years of opposition under the Nixon Administration, Congress created the Legal Services Corporation (LSC) in 1974 to continue federal support for legal aid. LSC received federal funding (starting at \$70 million in FY 1975) to make grants to over 300 local nonprofit legal aid programs throughout the United States and its territories to serve income-eligible persons with their civil legal needs. Congressional funding grew under the Ford and Carter Administrations to \$321.5 million in FY 1981.

Beginning with efforts to eliminate LSC and federal funding for legal aid throughout the Reagan Administration, LSC’s annual congressional appropriation has gone through numerous ups and downs and is \$330,803,705 for FY 2005. If the LSC budget had kept pace with inflation, it would now be \$718 million; and if it had kept pace with increases in the federal budget, it would be \$1,350 million. More than 43 million persons (in families with income not more than 125 percent of the federal poverty level) are currently eligible for LSC-funded services.

LSC dollars amounted to approximately 95 percent of the total funding for civil legal aid to the poor in 1981, compared to about 31 percent today. In response to steep cuts in LSC funding in 1981, many states began establishing other funding sources starting with interest on lawyer trust account (IOLTA) programs, followed by court filing fee surcharges, state appropriations, and other approaches, while legal aid programs also sought support from private foundations, bar associations, lawyers, and other private contributions. Total estimated funding for civil legal aid to the poor in the United States for 2005 is approximately \$956,344,000, of which approximately \$121,210,000 is from private sources (like foundations, bar contributions, and donations), \$113,905,000 from IOLTA, and the remainder from state and federal sources.

LSC funding is distributed to legal aid programs in states based on the number of income-eligible persons. Some states provide substantial additional public funding for legal aid, while such support is virtually nonexistent in other states; and the same is true for private contributions. The result is that the level of total funding for legal aid ranges greatly from \$20 per eligible person annually in 19 states to over \$50 per eligible person in seven states, and from a low of \$9 to a high of \$65 per eligible person.

Unmet Legal Need

LSC has just released a report, *Documenting the Justice Gap in America: The Unmet Civil Legal Needs of Low-Income Americans*, which concludes that at least 80 percent of the civil legal needs of the poor are not being met. The report’s findings are consistent with those of a 1994 American Bar Association national legal needs study and nine recent state legal needs studies. The LSC report indicates there is currently one legal aid attorney (under all combined funding sources and programs) per 6,861 low-income persons in the United States, compared to one private general civil service attorney per 525 persons in the general population. Because of the great disparity in funding, unmet civil legal need is substantially greater in many states.

Legal Aid Funding by Other Countries

The United States allocates much less public funding per capita for civil legal aid to low and low-moderate income persons than virtually all other comparably developed countries. According to a report from a June 2005 meeting of the International Legal Aid Group, the United States currently invests about \$.65 per \$10,000 gross domestic product for civil legal aid, compared to an average of \$4.38 (ranging from \$2.25 for Germany, \$2.47 for Canada, \$4.90 for Scotland, and \$10.50 for England) for ten other similarly developed countries.

Providing Legal Aid to Noncitizens in Immigration Cases

Unlike the United States, several other countries provide substantial support for civil legal aid to noncitizens in immigration (including citizenship and refugee appeal) cases. England allocates approximately 23 percent of its civil legal aid funding for such cases, compared to about 10 percent of the public funding for legal aid for such cases in Canada.

Conclusion

We are grossly underfunding civil legal aid for lower income persons in the United States, as measured in unmet legal need and in comparison with other developed countries. Unlike many other countries, we also provide very little public support for legal aid to noncitizens in citizenship and other critical civil legal problems. While legal services are inadequate in all states, conditions are much worse in some states that provide virtually no public funding for legal aid. Federal and state funding for legal aid should be increased substantially and funding should be provided for noncitizen services to effectively promote access to justice for all.

Robert J. Rhudy is prior executive director of the Maryland Legal Services Corporation and a past president of the National Association of IOLTA Programs, Inc. He states his appreciation to Justice Earl Johnson, (California Court of Appeals), Meredith McBurney (American Bar Association), and Ab Currie (Department of Justice Canada) for providing information used in this article.

Expanding Naturalization by Supporting Service Providers: The Role of Legal Resource Centers

By **Eric Cohen**

Legal Director

Immigrant Legal Resource Center

With as many as 11 million legal immigrants living in the United States today who are eligible for naturalization, support of their naturalization process presents a vital and necessary effort in ensuring the nation's continuance as a fully functioning democracy, one defined by broad civic participation that includes the influence of the immigrant community. To help ensure a supportive and participatory democracy—and encourage immigrant civic participation and acculturation—it is vital that as many immigrants as possible become naturalized U.S. citizens. Although there are other reasons why some immigrants never naturalize, one of the major barriers facing the community is the limited availability of free or low cost direct legal services. However, in addition to increasing the amount and accessibility of such services, resources in the form of training, publications, and technical assistance must also be provided so as to strengthen the capacity of direct service providers and maximize the effectiveness and efficiency of their efforts.

Why Is Naturalization Important?

In these times of xenophobia, threatened civil rights, and the silencing of dissenting voices in our country, efforts must be made to amplify the voices of grassroots immigrants and community-based organizations. There is a direct correlation between encouraging immigrants to embrace America through naturalization and their active participation as positive leaders and role models.

Naturalization is beneficial for individuals, families, and whole communities. Some of the benefits include: the right to vote in elections; the feeling of empowerment that allows individuals to become more involved in the political, social, economic, and social institutions around them and to fight against abuses of civil and human rights; the right to hold most elected offices and the right to hold certain federal and state government jobs; and the security of not being denied entry to or being deported from the United States.

Why Isn't Everyone Applying for Naturalization?

With all the benefits of naturalization, why are millions of eligible immigrants staying on the sidelines? The fact is, applying for naturalization is not easy and many immigrants decide they cannot do it on their own. Second, many immigrants have complicated cases and either the potential applicants or their advocates decide the case is too complex and risky to apply. Third, many potential applicants have limited literacy or English skills and choose not to apply. What is more, some groups of immigrants need special help and do not receive the assistance they need and deserve. These groups include children and refugees with disabilities. Finally, many immigrants avoid naturalization because they will lose rights in their countries of origin or because of the high cost of the application process.

The Supporting Role of Resource Centers in Strengthening Service Providers

Legal resource centers such as the Immigrant Legal Resource Center (ILRC) enhance the effectiveness of direct service organizations across the country by providing training, technical assistance, expert manuals and guides, and policy analysis. Essentially, we leverage an organization's existing resources by providing immigration services to increase their work's efficiency and effectiveness, thereby improving and expanding the comprehensive services available to immigrants. By providing expertise on naturalization law, policy, and procedures, we give direct service providers the answers to their most difficult questions, the confidence needed to handle complicated cases, and guidance toward efficient and effective representation and advocacy.

Examples of important ways to leverage the effectiveness and efficiency of direct service providers include:

- Providing comprehensive naturalization manuals designed especially for those who work at community-based organizations (CBOs).
- Chairing liaison meetings between CBOs and the United States Citizenship and Immigration Services (USCIS) around naturalization topics with the result of opening up lines of communication between CBOs and USCIS on national and local levels.
- Providing comprehensive training on immigration and naturalization issues so that all direct service providers are competent and well-versed in immigration and naturalization law. It is important that service providers helping with naturalization cases are

knowledgeable in most aspects of immigration law, not just naturalization, because understanding an applicant's experiences from start to finish will aid a service provider's ability to facilitate the naturalization process.

- Fielding requests for technical assistance about individual naturalization cases, policies, or procedures. By providing such technical assistance, not only are we answering the service provider's question about a specific case and thus increasing the likelihood that the applicant will become a U.S. citizen, but we are also building capacity so that service providers know more about the laws and procedures generally involved in naturalization cases.
- Consulting with organizations about how best to conduct off-site processing and other methods of efficient and effective naturalization application processing.

Conclusion

In America's post-9/11 environment, a prevailing anti-immigrant sentiment further ostracizes those whom we would consider the next contributors to the country's immigration narrative. Because our legal system is oftentimes unavailable to the underprivileged and underserved, the support of legal resource centers in combination with service providers is needed now more than ever. There are 11 million immigrants living in the country today who are eligible for naturalization, many of them are our family members, friends, and coworkers. Despite this eligibility, many either cannot afford or cannot access a legal system that is designed to protect and ensure their rights. Many more simply live in fear of a system that may be used against them—fearing detention and deportation consequences, separation and removal, or fraudulent consultants commonly referred to as notarios. By leveraging the support of resource centers such as the ILRC against existing service options, those committed to the rights and privileges of democracy will be better equipped to serve an immigrant community looking only to share in the opportunities that are the hallmark of America's social, political, and economic institutions.

Investing in Our Workforce: The New Americans Initiative

By **Eva Millona**

Policy Director

Massachusetts Immigrant and Refugee Advocacy Coalition

Immigrant workers have become indispensable to the expansion and sustainability of the Massachusetts economy. In 2004 immigrants accounted for 17 percent of the state's labor force. Between 2000 and 2004 Massachusetts gained 174,000 immigrants, without whom the population and the workforce of the state would have experienced no growth at all. Over the last 15 years, the number of immigrants living in Massachusetts has increased by 40 percent and now totals over 907,000. These statistical trends show that Massachusetts greatly needs an increase in services to immigrants to support the productivity and the well being of immigrant workers whose initial employment opportunities are often limited to the lowest-paying jobs. Since 2001, the immigrant population in Massachusetts has been devastated by the drastic reduction or complete elimination of many important and successful service programs. These cuts have jeopardized the health, welfare, and education of immigrant families and communities across the commonwealth. The elimination of immigrant services also place at risk the future of the economy of Massachusetts.

The Citizenship Assistance Program

Founded in 1997 in response to restrictions placed by Congress—restrictions still in place today—the Citizenship Assistance Program (CAP) gave low-income immigrants and refugees who might otherwise not have had access to educational services, the opportunity to learn English and civics, and to receive help with the citizenship application process. It also prepared immigrants for the immigration interview. These added skills and increased knowledge facilitated the immigrant clients' integration into the civic life of their communities. English proficiency is critical in acquiring and sustaining employment.

At the same time, CAP provided access to federal safety net programs. This was critically important because the federal welfare reform of 1996 restricted eligibility for many life-line programs, such as food stamps, Medicaid, and SSI, to immigrants who lived in the United States before 1996.

CAP was a great success, funding over 100 community-based organizations and serving over 23,000 individuals, 11,000 of whom became new American citizens.

At the time, the commonwealth recognized the importance of this safety net for low-income workers and their families and allocated state dollars that funded the continuation of many of these essential programs for this vulnerable population. Since then, however, state funding for most of these helpful programs has been eliminated.

Currently, vulnerable immigrants who work, pay taxes, and contribute to the U.S. economy must be citizens to access federal assistance during times of economic downturn and need. Because CAP helped immigrants become citizens, and thereby become eligible once again for federal benefits, Massachusetts saves over \$14 million annually in funding state food stamps and Emergency Aid to Elders, Disabled and Children (EAEDC). CAP was initially funded at \$2 million in 1997. Over the years, it was cut to \$1.5 million, then \$750,000. CAP was completely eliminated by then Acting Governor Jane Swift in 2002.

The New Americans Initiative

The successes that CAP enjoyed left providers with many lessons learned in the organization and implementation of services. From these lessons, CAP stakeholders designed the New Americans Initiative, a new program that would try to expand CAP's functions and capacities. The New Americans Initiative would be comprised of three components:

1. **English for New Americans.** The program will coordinate a statewide network that leverages urgently needed public, private, and individual funding of ESL classes for recent immigrants provided by mutual assistance associations, faith-based organizations, community-based organizations, and others. According to a recent study by the Massachusetts Institute for a New Commonwealth (MassINC) and Northeastern University, an immigrant who speaks English at home earns, on average, 2.5 times as much as an immigrant who does not speak English well (\$38,526 vs. \$14,221 annually). In Massachusetts, strong English-speaking skills are key, not just for civic participation, but also to economic success.
2. **Civics for New Americans.** Utilizing the expertise of local universities and national leaders, programs integrated with ESL services will be developed to prepare immigrants for the naturalization test and provide opportunities for civic engagement and increased participation in the civic life of their local communities
3. **Citizenship for New Americans.** The program will fund local immigrant-serving organizations to assist

immigrants in the often intimidating and confusing naturalization process. Services include application review and assistance, transportation for disabled applicants to and from the Boston USCIS office, and accompanying applicants to citizenship test interviews. These services increase the number of immigrants becoming U.S. citizens in a safe, efficient, and effective manner.

In Massachusetts there are over 300,000 legal immigrants eligible for, or in the process of, naturalization to become U.S. citizens. Of these, 18,501 are on waiting lists to access ESL classes in Boston alone. A large number, 71 percent, of the adult immigrants in Massachusetts are not prepared, primarily because of language barriers, to participate in the knowledge economy. It is evident that with nominal funding, Massachusetts has the capacity to effectively and efficiently implement a national citizenship plan to address these needs.

As a result, a campaign was waged to fight for funding in the state budget for the Citizenship for New Americans program. This campaign successfully garnered \$500,000 to go to the Massachusetts Office of Refugees and Immigrants to be disseminated to community-based organizations across the Commonwealth that provide citizenship services. These services include English as a second language classes with a focus on naturalization preparation, civics classes which concentrate on preparing students for the naturalization exam but also to be civically engaged in their communities, and technical assistance such as application preparation and follow up for immigrants in the naturalization process. Through this funding, about 7,000-8,000 immigrants will be served in the first year.

A Chronology of Naturalization Funding in Maryland

By **Gail Kramer Mogol**

Citizenship Program Coordinator
Baltimore City Community College

How excited we were in 1997 that the Office of Refugee Resettlement (ORR) under the U.S. Department of Health and Human Services issued a sizeable \$250,000 Request For Proposals for citizenship preparation! Refugee resettlement as we knew it was on the wane. For the most part, the Vietnamese and people from the former Soviet Union—the large refugee influxes of the late 1970's and 80's—had completed their journey to freedom in the United States and were successfully integrating into the fabric of our country. It didn't seem as though there were as significant refugee crises elsewhere in the world, and thus, acculturation was the buzzword of the time. Acculturation included naturalization.

Slightly earlier, Congress had passed the Welfare Reform Act of 1996. Tying a citizenship requirement to benefits eligibility was unpalatable to immigrant advocates, but on balance, certainly doable. After all, our culture is based on concepts of immigration, freedom, liberty, democracy, and inclusiveness. Couched in all of those terms, naturalization is a favorable, positive goal. Besides, there is an expectation that naturalization is highly desirable, given the opportunity. Congress assumed that a citizenship interview would provide no additional hardship. Citizenship preparation could be taught!

It was determined that the elderly were the most vulnerable as a result of the legislation. The Maryland state refugee coordinator, Frank Bien, always cognizant of the similarity of needs of immigrants as well as refugees, convened a work group of service providers to bring the issue to the Maryland General Assembly for inclusion in naturalization efforts. In conjunction with the Jewish community alliance, a lobbying effort was successful: \$75,000 was included in the year's budget allocation by the governor of Maryland, Parris Glendening. As Mr. Bien had envisioned it, the state grant would make no distinctions according to status, refugee vs. immigrant, for citizenship class registrations.

In Baltimore, Jewish Family Services and Baltimore City Community College (BCCC) had preempted the idea of offering citizenship preparation to the local community's naturalization-eligible population and were already teaching to full classrooms.

Funding was not an issue. And no one dreamed that it would be an issue.

BCCC won the statewide grant for a Citizenship Promotion Program based on its extensive experience. Classes were offered primarily in the Baltimore metropolitan area and in suburban Maryland—Montgomery County and Prince Georges County. These are the areas in the state most impacted by the foreign-born. In order to comply with the purposes of the federal grant, elderly students were targeted. The Maryland Department of Aging connected us to senior center sites and their respective directors; we also identified HUD-subsidized residences and churches; the various ethnic communities were engaged as partners; English as a second language (ESL) instructors and administrative staff were hired; volunteers were recruited; a textbook was chosen; and a curriculum based on its content was written. Should a formally educated instructor not be available, even a volunteer could teach from it. Both audio and visual aids were purchased for classroom use; a relationship with the Immigration and Naturalization Service (INS) was created through its community-based outreach effort, and a compilation of sliding scale or pro bono legal resources for referral was made available. CLINIC helped with staff development workshops. It was indeed a successfully coordinated effort.

By offering its grant, ORR had identified the burden on the elderly that the 1996 welfare legislation imposed, but immigrant advocates lobbied Congress to further ease that burden, and by October 1999 new legislation had diminished the threat. So ORR changed its grant focus toward mainstreaming the elderly into existing aging services. In just a few years, BCCC was without federal funding for the ESL, civics, and citizenship instruction it was providing to approximately 25 classes.

The only funding stream was the state monies appropriated through the governor's initiative.

While it was necessary to make changes in the program, not all developments could be construed as negative. For example, younger students who had wanted to enroll in classes were now able to attend, since the restrictions of the federal grant no longer held. In an effort to continue to accommodate all students, adjustments and revisions were made in the administration of the program where possible, without eliminating any classes. Weekly instructional hours were affected, however. For example, if a class previously met for three hours of instruction, the time was reduced to two hours. Additionally, some courses were shortened from twelve weeks to nine weeks. Instructors took on registration responsibilities, as a class facilitator position was left unfilled. Transportation expenses were assumed by either students' relatives or underwritten by other resources available at the senior centers.

In early 2000 when INS increased its fees, the program itself was unaffected, but additional distress for students and their families was caused. Fortunately, voluntary agencies and INS attended to this problem through subsidies and fee waivers.

By 2001 BCCC negotiated to add a portion of State Department of Education civics education funds to the citizenship effort, although it was limited to the Baltimore area. Finally, however, the impact of reduced funding affected the number of classes offered. Those sites having the highest enrollments were retained, and those with less than an optimum number of students were either consolidated or eliminated. Total enrollment dropped from about 225 to about 150 per session. In addition, the facilitator positions were greatly reduced. As a result, teachers assumed more administrative tasks in the classroom, and communication was effected via telephone, e-mail, or the postal service, rather than face-to-face interactions at classroom visits. Marketing was concentrated on free advertising—public service announcements, notices in ethnic newspapers, and media publicity during opportune times, such as Independence Day. Proudly, the quality of the instruction never faltered.

Further reductions in funding came as a result of the program's popularity and success. Many students were being naturalized! Local jurisdictions wanted to be included and pressured the state office to fund efforts in their areas. BCCC responded to the loss of funding by again eliminating administrative costs. Finally, the program coordinator acted as coordinator, facilitator, and secretary. In addition, the summer session was eliminated.

By the beginning of 2005, the program coordinator was administering two other unrelated programs in addition to the citizenship program, since the other two paid a concomitant portion of the salary. But the greatest danger to the program was from the annual budget of the state legislature. Every year the program was carefully reviewed and able to pass the scrutiny of the legislature and then the governor. Despite a few close shaves, the program had always survived. This year, however, Maryland was in the throes of serious budget cuts, in order to comply with the law requiring a balanced budget. Despite all efforts, citizenship preparation was eliminated from the state budget.

Although the college had applied for a newly issued ORR Request For Proposals for elderly citizenship preparation, it was generally assumed that the citizenship preparation program had ended.

Then in July, the governor discovered some additional funds, and reinstated the citizenship program, but only in the one jurisdiction with the largest number of immigrants. At the same time, ORR assigned its funding for the elderly, and Maryland was one of the state recipients. So the citizenship preparation program in Maryland continues to offer classes for naturalization-eligible people of all ages, of all legal statuses, in convenient, neighborhood sites.

As illustrated above, the availability of funding has played the significant role in whether citizenship preparation can be offered on a regular basis. Although BCCC has had the longest experience in the state with the program, navigating funding streams has offered extreme challenges. Through it all, the excitement of preparing applicants for the naturalization interview is still as paramount to immigrant advocates as it was at the program's inception. After all, isn't citizenship a cornerstone of our culture?

That philosophy and commitment has maintained the program throughout. Adjustments have been varied and at all levels of the program. To reiterate, the primary administrative salary has been underpinned by the addition of other program responsibilities, although in exchange, citizenship program issues get addressed in less depth. Other changes include narrowing class sites to those that are most convenient and cater to the largest enrollments. E-mail has replaced face-to-face coordination and mentoring. Some administrative processes have been transferred to the classroom teacher, who has assumed those roles out of

dedication to his or her students and to the idea of the program. When there was the real possibility of the elimination of funding, several of the instructors continued teaching on a voluntary basis! And several sites explored methods to continue the offering independently!

Stable funding, perhaps at the national level, directed toward all types and all ages of immigrants would certainly alleviate these problems and reinforce the traditional American concepts of inclusion, tolerance, and diversity.

State Support for Citizenship: An Illinois Perspective

By **Fred Tsao**

Policy Director

Illinois Coalition for Immigrant and Refugee Rights

The state of Illinois has been among the leaders in the nation in promoting citizenship. The Refugee and Immigrant Citizenship Initiative (RICI) and the New Americans Initiative (NAI) have shown how states, partnering with immigrant community organizations, can assist thousands of immigrants in becoming citizens.

Refugee and Immigrant Citizenship Initiative

In 1995 Illinois became the first state in the nation to fund citizenship services. Under the leadership of Republican Gov. Jim Edgar, the state launched the Refugee and Immigrant Citizenship Initiative (RICI) program. RICI sought to address the needs of two groups who would imminently become eligible for naturalization: immigrants who had legalized under the 1986 amnesty and were about to complete five years of Lawful Permanent Resident status, and refugees who had resettled in Illinois from Southeast Asia, the former Soviet Union, and other parts of the world. The need for refugees to naturalize became especially urgent with the passage of the 1996 federal welfare law, which set a seven-year limit on refugee eligibility for most safety-net benefit programs.

RICI has sought to build a public-private partnership to facilitate naturalization. The state distributes grants totaling more than \$1 million each year to organizations within immigrant and refugee communities, agencies that these communities know and trust, so that they can provide citizenship preparation classes and assistance with naturalization applications. To date, RICI-funded programs have assisted more than 90,000 immigrants and refugees to receive citizenship services, with particular success among the refugee communities. Another measure of RICI's

success is that since its inception, the average number of immigrants naturalizing in Illinois each year has doubled from 16,000 to more than 33,000.

RICI also specifically funds educator training, as well as networking and communication among grantees, and administrative advocacy on citizenship-related issues. RICI funding to the Illinois Coalition for Immigrant and Refugee Rights (ICIRR) helped our efforts to highlight the naturalization backlogs at the INS during the late 1990s and, in alliance with other state coalitions, successfully advocate for federal resources for INS to reduce the backlog. With RICI support, ICIRR and our allies also advocated for changes to the revised N-400 naturalization application form drafted by the INS (which replaced a four-page form with a ten-page form); argued against proposed fee increases for naturalization and other immigration benefits; raised strong concerns about the proposed redesign of the naturalization test; and worked locally to ensure access to immigration services for immigrants with disabilities.

RICI has thus not only benefited immigrants and refugees who now have improved access to citizenship education and services through organizations in their communities, but it has also helped raise the voice of these organizations in advocating on behalf of their constituencies.

New Americans Initiative

Even with the success of RICI, the numbers of legal immigrants who had not naturalized was staggering. In 2003 the Urban Institute reported that according to the 2000 Census, 340,000 Lawful Permanent Residents in Illinois were eligible for naturalization but had not yet become citizens. Another 140,000 would become eligible within five years. Combined, these lawful residents made up one-third of the state's foreign-born population. Further research by the Chicago-based Metro Chicago Information Center revealed the most common obstacles that discouraged these immigrants from seeking U.S. citizenship: lack of information about the application process, lack of confidence in their English proficiency, and lack of knowledge about the benefits of U.S. citizenship.

In response, ICIRR developed the NAI, which Gov. Rod Blagojevich, a Democrat and son of a Serbian immigrant, embraced and included in his proposed state budget. In July 2004, at a time when other states were cutting back or even eliminating their citizenship funding, the Illinois General Assembly approved \$3 million in funding for NAI for each of the following three years.

NAI currently provides grants to 12 collaboratives, involving 49 community-based organizations. These collaboratives team up agencies that perform outreach and identify potential applicants with immigration service

providers that assist with applications, legal service providers that offer technical support and representation in problematic cases, and education programs that offer English and citizenship classes. The collaboratives organize workshops where would-be citizens can complete their applications and receive appropriate referrals to participating education and legal service programs. ICIRR administers the program overall, works with media, foreign consulates, and other allies, and offers training and technical support to grantee staffers. In the first nine months of the program, NAI grantees have made contact with 35,000 immigrants and completed 2,879 citizenship applications. NAI's overall goal is to move 60,000 Illinois immigrants to U.S. citizenship during the three years of the program.

Continuing Challenges

Even with ongoing funding for RIC and NAI, immigrants and refugees face major obstacles in seeking citizenship. Perhaps the most significant is the lack of English language educational resources. According to the 2000 Census, more than 9 percent of Illinois residents, 1.1 million people (both U.S.-born and foreign-born), have difficulty speaking English. This includes more than half of the 1.25 million Illinois residents who reported speaking Spanish and just under half of the 249,000 Illinois residents who speak an Asian or Pacific Island language. Public resources for English education come nowhere near meeting the needs of this population: In fiscal year 2004 the Illinois Community College Board granted \$57.6 million to schools and community organizations for programs that reached 161,000 adult education students, including 87,000 ESL students. Several times that figure will be necessary to reach every Illinois resident who needs English training, even as the federal government continues to put these programs in danger of budget cuts.

The state has taken an important step toward addressing this and other obstacles. On November 19, 2005, Gov. Blagojevich issued a first-in-the-nation New Americans Immigrant Policy Executive Order commanding that the state develop a comprehensive approach for immigrant integration. The order establishes an Office of New Americans Policy and Advocacy within the governor's office to coordinate integration efforts within state government, as well as a blue-ribbon policy council staffed by ICIRR that will consider policy alternatives on issues such as education, health care, and housing, and produce a short list of concrete, practical recommendations on how to best address the needs of immigrants in each area. This New Americans Executive Order Policy Project specifically examined English acquisition and citizenship at a session on February 23, 2006. Building upon ten years of success with RIC and NAI, our goal will be to create a blueprint not just for the state of Illinois but also for states across the country, for supporting immigrants as they learn English, apply for U.S. citizenship, and reach for their American dream.

Building Community, Building Trust: Citizenship Efforts in the Arab- American Community

By **Karen Rignall**

Director of Network Planning National Network for Arab-American Communities

Arab Community Center for Economic and Social Services

Anyone who has attended an oath ceremony for naturalizing Americans understands the atmosphere of anticipation and accomplishment surrounding the occasion. A sense of hope joins together people with disparate histories and experiences of life in the United States—refugees healing from war, families reunifying, and immigrants building new lives. For Arab Americans, this experience has been especially poignant in the last few years. The oath ceremonies that the Arab Community Center for Economic and Social Services (ACCESS) has hosted in Dearborn, Mich., offer a hopeful beacon of the role Arab Americans can play in making our democracy as diverse and rich as it could be. The ceremonies have also provided palpable relief to a community that feels targeted—by the government and by other Americans—in the wake of September 11.

ACCESS believes that partnerships supporting the citizenship efforts of new Americans are essential for building a culture of dialogue and understanding. If Americans saw the monumental efforts that new immigrants had gone through to become citizens, many misperceptions about immigrants would indeed be mitigated. Dismantling these stereotypes is a particularly urgent task for Arab Americans. Many see Arab Americans as “foreign,” with a culture “alien to American values,” even though they have contributed to this country for over 150 years. We hear often that Arab Americans should integrate more, yet 55 percent of Middle Eastern immigrants held American citizenship in 2000, compared with 38 percent of immigrants overall (according to the U.S. census). Arab-American community organizations are stepping in with limited resources to help Arab immigrants fulfill their dream of becoming full participants in our civil society.

We ought to show how much we support American values by helping immigrants—Arab and non-Arab—along the path to citizenship. Reducing backlogs and providing resources for citizenship programs are important, but in the meantime, we can make tangible progress with smaller efforts such as building partnerships with the government in hosting citizenship ceremonies. For Arab Americans, this symbolizes the positive role our own community plays in strengthening civic engagement and provides an alternative image to the suspicion and scrutiny that mark our daily lives.

A Rush to Citizenship

Arab Americans are used to being a “problem.” Negative stereotypes pervade the media and influence public policy, and have affected our community’s experience of American life for decades. After September 11, 2001, these stereotypes became much more dangerous for Arab immigrants. Beyond the secret detention of thousands of Arabs and Muslims in the wake of the attacks, the National Security Entry Exit Registration System’s “special registration” program has resulted in the deportation of thousands more. Periodic FBI interviewing of certain classes of Arab and Muslim immigrants and visitors has further heightened the fear of government and the immigration system itself. Despite this fear, or perhaps because of it, there was a rush to citizenship after September 11. In addition to the standard reasons for naturalizing—the desire to vote, family unification, and access to better jobs among them—Arab immigrants wanted the additional protection that American citizenship would afford. Beyond the traditional backlogs, however, immigrants faced some new challenges. ACCESS has seen that three out of ten of our Arab clients are delayed up to two years in the FBI “name check” background check required of all applicants. Anecdotally, this delay is experienced more by Arab immigrants than immigrants from other regions.

How the Arab-American Community Is Engaged

These challenges make the citizenship efforts of ACCESS and other Arab-American groups all the more important. As the largest immigration services provider in the Detroit metropolitan area, ACCESS has seen the benefits of building strong relationships with the USCIS and our congressional representatives. In the past three years, we have hosted six oath ceremonies bringing together between 500 and 700 naturalizing Americans for this celebration of citizenship. Alfonso Aguilar, chief of the USCIS’s Office of Citizenship, returned to Dearborn in late 2005 to preside over his second oath ceremony hosted by ACCESS. These ceremonies cement ongoing efforts to build bridges with USCIS so that we can both better serve our community.

At a time when Arab immigrants are so fearful of stepping forward, we can use our long history as an immigration services provider to serve as an advocate and engage with our government counterparts. Our relationship with our congressional representative has been similarly productive. Rep. John Conyers has placed a bilingual staff person at the ACCESS office twice a week to help our clients clarify complicated cases and move along appeals. This not only helps our clients navigate a complex system, it has maintained an open line of communication so that the congressman can follow the issues his constituents and their families face.

ACCESS has evolved from a small storefront offering basic services in the early 1970s to become one of the premier community-based organizations offering immigration services in Michigan. We have been able to maintain the trust of our community precisely because of our ability to build relationships with the government offices that so many Arab Americans fear. Arab immigrants know that we will serve as a strong advocate for their needs and that we understand the way the immigration system works. ACCESS is far from the only example of this in the Arab-American community. Grassroots organizations use similar approaches all around the country, joining together in 2004 to form the National Network for Arab-American Communities in order to share experiences and advocate for our community’s needs. Immigrant integration is one of the network’s first priorities because we know the importance of promoting community empowerment and sustaining civic participation.

As our nation grapples with easing the path to citizenship, we should not forget the pivotal role grassroots organizations play in reaching vulnerable or marginalized communities. Community-based organizations are often the only institutions that have been able to garner the trust of immigrant groups. While we figure out how to reduce backlogs and allocate more resources to citizenship efforts, we can still make progress by building community-government partnerships and using these partnerships to lay a foundation of trust and dialogue.

Citizenship for Seniors

By **Robert Moser**

Deputy Director

Catholic Charities of San Diego

In the United States, the elderly are commonly referred to as “senior citizens.” This nomenclature implies a respected social status. Unfortunately, this population too often experiences barriers that challenge if not contradict this interpretation. Such reality is particularly poignant for seniors seeking to attain citizenship as a legal status. In their case, becoming a “senior citizen” is often an oxymoron.

Catholic Charities, Diocese of San Diego (CCDSD) has been a provider of services to refugees and immigrants since 1975. Prior to the passage of federal legislation in 1996 that limited receipt of SSI to citizens, our immigration program seldom saw elderly applicants for naturalization. Since then, however, the number of persons over the age of 65 assisted by our agency to complete and submit an N-400 amounts to 1,823 or 13.4 percent of the total filed. Those aged 55 to 64 represent an additional 11 percent (n =1,504). This data can be compared to figures published by the USCIS for the period 1986 to 2004.

Nationwide, the percentage of naturalized persons who were 55 years of age or older more than doubled over the decade from 1986-96 (10.2 percent to 22.2 percent), peaked in 1998 (28.6 percent), and declined since then to 18.1 percent in 2004. Clearly the demand for naturalization among older legal permanent residents has changed over time. Although the approval rate by age is unknown, information regarding the total number of denials as a percent of the total number of applications adjudicated shows a dramatic increase beginning in 1996 when Congress passed legislation to eliminate noncitizen eligibility for federal means-tested benefits. Denial rates over the past decade (1996-2004) average 23.3 percent compared to 2 percent in the decades between 1950 and 1990. Such significant changes suggest, if not signify, a need to reevaluate how seniors are viewed and treated in their quest toward citizenship.

Both advocates and adjudicators recognize that the aging process itself, with associated illnesses and infirmities, can impact the ability of older persons to learn and retain the information and skills needed to satisfy the civics and English requirements. The N-648 waiver and the 50/20 and 55/15 rules are examples of accommodations that enable qualified elders to receive exemptions from the language criteria. A problem occurs, however, when steps intended to address the special needs of seniors serve instead to detract from both the process and outcome of citizenship.

For example, in certain countries, persons over the age of 55 are considered “old.” Cultural beliefs and social roles define what these elders can do. Respected for their age, such seniors are often tapped for their experience and wisdom. Unfortunately for many, somehow after they immigrate to America a change takes place, as they now become viewed as “incompetent.” Whether it is the American bias toward youth, the complexities and difficulties of acculturation, the fear of failure, or the desire on the part of others to help, the popular view has developed that older immigrants cannot learn new information or cannot demonstrate certain competencies simply because they are “old.” Such a stereotype flies in the face of the fact that an individual’s intellectual and sociological capacities are influenced by multiple factors, including self-identity, educational background, and social support systems. Similarly, there develops a self-fulfilling prophecy when the way in which people are defined influences how they are treated, and in turn, how their responses reinforce the initial assessment. It is a premise of this article that it will never be known how much any senior can achieve if labels box them into a generational category of “cannots.”

Another issue involves the N-648 waiver process. Intended as a means for a person with a bona-fide disability to obtain objective verification and validation of the condition’s connection to the ability to learn, the N-648 can devolve into a meaningless “doctor’s excuse” that speaks more to

the person’s age and educational background than to her or his medical or mental status. At worst, some physicians and psychologists provide diagnoses and prognoses that are contradicted by other information, thereby raising concerns about the integrity of their input. Recent reports of a governmental investigation into possible fraud in the San Diego area regarding the N-648 underscore this problem.

As an alternative, the naturalization process could utilize and expand upon the existing methodology of combining age and years of legal permanent residence to excuse an applicant from the English requirement. The current 50/20 and 55/15 rules could easily be extended and applied to any combination that totals or exceeds 70, starting at 50/20 and ending at 65/5. Any age after 65 combined with 5 years of Legal Permanent Resident status would also qualify for this waiver.

Such a proposal would leave intact the civics requirement, which the eligible elderly applicant could fulfill orally in his or her native language. Hopefully, the redesign of the naturalization test to make it more meaningful would also apply to seniors. Many older immigrants and refugees are experienced in the principles that underlie American citizenship. Freedom, loyalty, sacrifice, and service are not foreign to the foreign-born. Often the elderly exhibit a greater interest and insight into politics and government than younger generations. Given the opportunity to express themselves about core values and given appropriate support to learn about American democracy at work, many seniors would be empowered to demonstrate their assets and abilities rather than enabled to document their disabilities.

Granted this recommendation does nothing to address those applicants who would not qualify under its condition, but it does something substantive, however, for a segment of the population. Namely, it provides dignity to both the applicant and the application. If achieved, becoming and being a “senior citizen” gains the respect it deserves.

Bringing Community Groups into the Citizenship Classroom in Formal Collaborations: Lessons from Chicago

By **Aliza Becker**

Citizenship Education Consultant and Author

and

Sandra Del Toro

Organizer, Southwest Organizing Project

The naturalization process presents an opportunity for future citizens not only to obtain individual benefits (e.g. the ability to petition for U.S. residency for family members and the elimination of the threat of deportation), but also to engage in a transformative experience, building an understanding of, and interest in, civic participation.

Historically, service organizations and community groups have been involved in the citizenship process with overlapping but distinct goals. Many community groups, especially those in immigrant communities, are concerned with reaching and motivating the largest number of noncitizens in their community to naturalize and subsequently encouraging them to become active community participants and voters. In contrast, service providers are largely focused on making sure that applicants' papers are legally sound, and that the applicants are able to pass the citizenship test.

Community groups generally operate under the organizing principle, "don't do for others what they can do for themselves." Their focus is on leadership development and collective action. Such groups facilitate leadership training in a process whereby people identify issues of concern in their community and organize groups of residents to make changes. Community groups primarily work with institutions—churches, hometown associations, schools, and other organizational entities. Their target audience is community residents who are already part of networks that include many new and prospective citizens.

Classroom citizenship engagement instruction is generally within the purview of the citizenship preparation instructor. Civic empowerment exercises are integrated into the class curriculum, which is necessarily focused primarily on helping students pass the test.

While there are many good civic engagement materials available, the quality of classroom civic engagement instruction varies greatly, for several reasons: limited time available for instruction, the service orientation of the institution conducting the classes, and the idiosyncrasies of individual teachers—their knowledge and training, access

to resources, understanding of relevant issues, and overall level of comfort in teaching a topic that is tangential to passing the citizenship test. Also, teachers generally do not have an existing relationship with local groups that are already working on issues important to class members, making it difficult to foster an atmosphere that allows students to practice these skills on an ongoing basis after they have completed the class.

In order to enhance the quality and impact of civic participation instruction, several collaborative partnerships were recently formed between community groups and citizenship education providers in the Chicago area. Experience to date with these new initiatives indicates that these models offer many promising approaches.

Staff from two collaborations were interviewed for this paper. One partnership is between an organizing group, Interfaith Leadership Project, and the satellite classes of a larger educational institution, Instituto del Progreso Latino. The second is between Instituto and the Southwest Organizing Project (SWOP), with outpost classes based at SWOP member institutions. In one case, the community organization's involvement was motivated by an interest in building and sustaining relationships, and identifying potential leaders in a member institution; in the other, the group was interested in reaching beyond its traditional member constituencies.

Both collaborations emphasize the idea of building a connection between organizers and students. The organizer spends four to eight classroom hours with the students during the session, both in formal leadership development training and as a resource for other local volunteer opportunities or community activities, such as motivating other neighborhood residents to become citizens, sharing their success stories with members of the media and elected officials, or participating in one of the community organization's standing issue committees.

The leadership development curricula include discussion of how the seemingly individual decision to naturalize affects the community as a whole, giving students a broader sense of what becoming a citizen means. In one program the discussion is fostered by introducing students to community organization leaders who have played a key role in developing neighborhood improvement initiatives, including immigration reform, school improvement efforts, or housing initiatives. The curricula may also include discussions of the organizing process required to obtain the resources to pay for the class itself, and current students' potential roles in seeing those initiatives continue in the future.

Students are also invited to participate in and reflect upon a collective action, such as large community meetings, rallies, or conventions. At a recent event, citizenship students attended a town hall meeting at a local church with former

vice-presidential candidate, John Edwards. One student had the role of asking Edwards his position on immigration reform. Reflection upon these meetings is critical to having students understand the role of their participation in the success of the event. Questions may include: “How did you feel to be a part of this action? Did you feel respected? Did you feel powerful? Why or why not?”

Planning and conducting a meeting with a local elected official is another effective activity used by organizers. Students learn about the role of government as they think through questions they plan to pose, and how to respond to questions the elected officials might have for them. The classes are conducted bilingually, but the meeting is conducted in English. Questions from a recent meeting included, “Why did you decide to become a public official?” and “What did you think about President Bush’s announcement that he would put the National Guard at the border?” Students practiced responses to potential questions about why they came to the United States and why they want to become citizens, and their opinions about salient immigration issues.

This model for collaborations should be explored further, with the understanding that conditions for such partnerships are not universal. The issue of sustainability is particularly important to understanding how best to have a long-lasting impact on students’ ability to continue their civic participation efforts after taking their citizenship exams.

The model underscores the fact that civic engagement need not be limited to a citizenship classroom under the direction of a single citizenship instructor. Rather, teachers and organizers can work in their own areas of expertise, allowing students to learn about a spectrum of opportunities for civic engagement, including voting, but in no way limited to that activity. Collaboration allows for a hybrid model, which links the expertise of service organizations, specializing in preparation for and passage of the citizenship exam, with organizing and leadership development, thereby increasing the likelihood that students who choose to will have a venue in which to sustain their civic engagement even after the class is completed.

One difficulty with this model is the variable of trust in developing partnerships. Organizing entities presented here had long-standing, trusting relationships with the educational service organizations, and these relationships were instrumental in carrying the project forward. Both groups needed to have a commitment to the roles of their partners and an understanding that students’ foremost priority was to pass the citizenship exam. Trust between the citizenship students and the organizer in the community group is also significant in ensuring that students exercise their new skills upon completion of their classes. Organizers were present in the classroom throughout the students’ class time, and developed opportunities for

students to interact with each other and reflect upon shared experiences as a class. Community organizing partners must use a model that encourages students to develop their own opinions on key issues and provide opportunities to discuss and debate them.

Some additional limitations relate to the question of language: The groups presented here were able to utilize a bilingual (Spanish/English) model with Latino immigrants, but many citizenship classes combine students of different countries of origin speaking a diverse number of languages.

This paper presents several promising ideas for engaging students in long-term civic participation efforts through collaboration between service organizations and community organizers, but the scope allows us only to scratch the surface of the lessons learned. Additional research is needed in order to ascertain the level of ongoing involvement once students have left the classroom, as well as examining other promising practices throughout the country.

Teaching Citizenship Classes

By **Peter J. Slevin**

Retired Probation Officer

Volunteer at La Esperanza Social Service Center

I had moved down to Bethany Beach, Del., in 1993 after retiring twice. I suppose I was open to the idea of eventually doing some volunteer work, but in no hurry to get involved. Then, a year or so later, I met one of the Carmelite sisters who had just recently opened a social service center to help meet the needs of recent immigrants from Mexico and Guatemala. These people had come to the area around Georgetown, Del., to find work in the poultry industry. Learning that my mother had been a Spanish-speaking immigrant, she suggested that I could possibly be of some service. There was a need for someone to give citizenship classes to prepare eligible people for the final exam in the naturalization process. Since my Spanish was less than proficient I expressed some hesitancy.

Sister Ascensión would have none of that. She said people needed a teacher who spoke in English since the exam was given in English. I agreed to take a stab at it and started to get ready. I looked over the material she gave me, a sheet of 96 questions and answers about American history and our form of government. I also had a booklet from the INS, which explained the naturalization process in detail. After I had a few days to review my son’s American history textbook, as well as a shorter text from the INS that was geared to the level of a high school senior, I bit the bullet and told the secretary at La Esperanza to get the word out that we were now going to give citizenship lessons. Sister had insisted on some sort of schedule that would make it possible for persons from varying work shifts in the

poultry plants to attend the classes. We ended up with a class early Monday morning and another late Wednesday afternoon. We scheduled the classes for an hour's length.

Well, in no time we had two classes going per week with the average size of the groups around six. I had decided to reorder the 100 questions according to a theme so as to avoid mere memorization and make the questions meaningful in their thematic context.

The subjects were the flag, the colonies, independence, the Constitution, the legislative branch, the executive branch, and the judicial branch, with several additional questions regarding later U.S. history. The only handout was an explanation of the course's purpose, a page on the theme list, and a copy of the famous 100 questions with their answers.

I am sure anyone who has taken on teaching any kind of class will say that one learns as one teaches. This was certainly the case for me. To make a long story short, I learned that the differences in English proficiency were notable and caused a good deal of discomfort for many of the less fluent students. Most were between the ages of 20 through 40 and had had varied educational backgrounds at home. Another problem was the occasional absences that made it difficult to move on with the majority of the class. Often, the absent student did not even have the time available for me to bring him or her up to speed. I also learned that my Spanish was a lot better than I thought. This helped explain terminology, and even allowed for some teaching of basic English specific to the test language.

Also unexpected was that the fact that I could speak some Spanish, and even more, that my mother was Hispanic and had to take the same test in 1940, sort of created a bond between many of the students and myself. Another insight I will mention is learning that I would have to put more into the orientation about the conditions surrounding the exam itself.

I had a regrettable experience of having a man go to the exam quite ready to answer any question. He arrived at the examination thinking he was well prepared. The examiner ordered, "Raise your right hand, please." My student froze, not knowing what to do or say, and was immediately told that the exam was over. (He later passed!)

At present, as a result of these early experiences, I now continue to hold classes on each Monday morning and Wednesday afternoon. I take the students one at a time. I have a worksheet for each class that, in essence, requires the student to write out the answers to the day's questions as a homework assignment, just as he or she will have to do in the real final exam. I can give whatever special attention the individual student may need.

Missed classes are no longer a problem. I have a world map and one of the USA on the wall that have turned out to be surprisingly useful. I have the time to work with students who can use some help with specific English problems that could affect test performance, and I will refer people to academic programs available in the community if I believe they are not sufficiently ready language-wise to take the final exam. My students do well on the tests, becoming citizens. Those who don't make it the first time will usually do so if they return for a review course.

I should mention that one thing I am privileged to do is to light a fire of self-confidence in many of my students who for many reasons do not always have the confidence they need to be successful in some area of life. If they make it in this exam, they are learning to negotiate a system within a different culture, and they are doing it in that system's language. I have also learned that I can get the job done in 30-minute classes. It seems to focus me in my presentations, and takes into consideration that a man or woman who has worked all night, or all day, for that matter, can do much better in that time frame.

I understand there are many persons in our population who are, in fact, eligible to apply for citizenship. It may very well happen that there will be a need for more persons to involve themselves as teachers to prepare these candidates to pass their final test. I would encourage anyone who feels called to do this to not allow himself or herself to be discouraged or dissuaded. With a bit of preparation, it is quite amazing what one can do. Also, it is a humbling but rewarding experience to really help a person do something as worthwhile as to become an American citizen.

1 Commentaries in this chapter are the opinions of the authors and do not necessarily reflect the opinions of Catholic Legal Immigration Network, Inc. (CLINIC).



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