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A MORE PERFECT UNION: A NATIONAL CITIZENSHIP PLAN

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1 Introduction

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. Naturalization can be viewed as a benchmark of immigrant integration. However, the United States lacks a coherent immigrant integration policy, much less a coordinated program to promote citizenship and to prepare immigrants for naturalization.

Most immigrants strongly value U.S. citizenship. Fully 90 percent view citizenship as something “necessary and practical” or a “dream come true.”¹ Yet, obstacles to naturalization are particularly challenging for the increasing number of immigrants with limited English proficiency, low income, and limited formal education.

2 Study Purpose

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 services agencies, English language instructors 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 for current and future lawful permanent residents commonly referred to as LPRS or “green card” holders.

2.1 Study Overview

Research for *A More Perfect Union* reveals facts about: 1) the most vulnerable immigrants currently eligible to naturalize; 2) perspectives on the future eligibles hopefully coming from a legalization bill; 3) an analysis of how the U.S. government fails to broadly promote citizenship or provide naturalization services; 4) why a national citizenship program is needed; and 5) what outcomes can be expected of a national citizenship program.

¹ 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.

2.2 *Selected Characteristics of Immigrant Citizenship Groups*

Research for a national citizenship plan arose from a previous report by the Urban Institute in 2002 entitled *Trends in Naturalization*, updated by the Pew Hispanic Center in 2007 and named *Naturalization Trends*. The recent report reveals that the U.S. has at least 8.4 million lawful permanent residents eligible to become citizens.² This is exciting for our democracy and society but a challenge because we do not have the resources dedicated to promote citizenship robustly or provide naturalization services on this scale.

We know from the Pew Hispanic Center study that lawful permanent residents today, compared to recently naturalized citizens, have less English language ability, formal education and income. Nearly sixty percent (55%), at least 4.6 million, are estimated to be “limited English proficient.” Twenty-four percent (24%), or about 2.1 million people, have less than a ninth grade level of education compared to just 9% of those recently naturalized. In addition, 41 percent of LPRs eligible to naturalize have incomes less than 200 percent of the poverty level, and worse, approximately 17 percent have incomes under the federal poverty level altogether.³ (The poverty level for one person equals \$9,800 and for a family of three equals \$16, 600.)⁴

Three quarters of those eligible to naturalize live in five states: California, New York, Texas, Florida, New Jersey and Illinois; one-third alone in California.⁵ But the dispersion of the remaining 25% of eligibles in other states is widespread across the country.

2.3 *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).⁶ Although other minorities have improved their English literacy skills in the past decade, English literacy among Hispanics has declined. In 1992,

² Passel, J.S. *Naturalization Trends, 1995 – 2000* (Washington, DC: pew Hispanic Center, Forthcoming 2007).

³ Ibid.

⁴ Federal Register, (January 24, 2006), Vol. 71, No. 15, pgs. 3848 – 3849.

⁵ Passel, J.S. *Naturalization Trends, 1995 – 2000* (Washington, DC: pew Hispanic Center, Forthcoming 2007).

⁶ Martinez, T. and Wang, T. *Supporting English Language Acquisition: Opportunities for Foundations to Strengthen the Social and Economic Well-Being of Immigrant Families* (The Annie E. Casey Foundation and Grantmakers Concerned with Immigrants and Refugees, 2005), p. 6.

35 percent of Hispanics were identified as having below basic English reading and speaking skills. This figure increased to 44 percent in 2003.⁷

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.”⁸ 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.⁹ 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.¹⁰ Only 71 percent of elderly applicants 65 years and older passed the English portion of the test on the second attempt.¹¹ 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.¹² 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).¹³ These rates improved to between 90.7 percent and 93.6 percent after the last attempt on the test.¹⁴ 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.¹⁵ Refugees had a

⁷ National Center for Education Statistics. *National Assessment of Adult Literacy: A First Look at the Literacy of America's Adults in the 21st Century* (Washington, DC: U.S. Department of Education, December 2005), p. 8.

⁸ Gallagher, M. “Highlights From Phase One of the New Americans Research Project” Presentation to the Illinois Coalition for Immigrant and Refugee Rights by the Metropolitan Chicago Information Center (January 2006).

⁹ Passel, J.S. *Naturalization Trends, 1995 – 2005* (Washington, DC: Pew Hispanic Center, Forthcoming 2007).

¹⁰ American Institutes for Research. *Pass Rates for the Current U.S. Naturalization Test: Results from the Records Study* Report prepared for the U.S. Citizenship and Immigration Services (February 8, 2006), p. 7-8.

¹¹ *Ibid.*, p. 10.

¹² *Ibid.*, p. 10.

¹³ *Ibid.*, p. 16.

¹⁴ *Ibid.*, p. 14.

¹⁵ *Ibid.*, p. 14-15.

significantly lower pass rate for the first attempt in comparison to applicants with other types of immigration status, 77 percent compared to 86 percent.¹⁶

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.”¹⁷ 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

¹⁶ Ibid, p. 15.

¹⁷ The Urban Institute. *Immigrants in New York City and Los Angeles: Language Barriers, Legal Status and Hardship* (2002), available at <http://www.urban.org>

neighbors, engaging in civic life, and becoming integrated into their new community.”¹⁸

2.4 *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.¹⁹ A survey of over 500 immigrants in New York City showed that nearly 90 percent wanted to learn English.²⁰ 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.²¹

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

¹⁸ Martínez, T. and Wang, T. *Supporting English Language Acquisition: Opportunities for Foundations to Strengthen the Social and Economic Well-Being of Immigrant Families*.

¹⁹ Tolbert, M. *English Literacy and Civics Education for Adult Learners* (Washington, DC: National Institute for Literacy, August 2001), p. 2.

²⁰ New York Immigration Coalition. *Eager for English: How and Why New York’s Shortage of English Classes for Immigrants Should Be Addressed* (New York, 2001), p. 1.

²¹ *Ibid*, p. 6.

widely from several weeks to more than three years.²² Another study suggests that the availability of classes in the New York area actually decreased as immigration increased in the 1990s.²³ “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.”²⁴

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 civics²⁵ instruction and ESL and citizenship instruction²⁶ 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.

2.5 *What A More Perfect Union Offers Professionals in the Fields of Citizenship and English Language Instruction*

A More Perfect Union dedicates one of its twelve chapters, “Preparing Immigrant Learners for Citizenship” to the critical issue of expanding English and civic instruction. Written by five experts in the field, 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

²² Tucker, J. T. *Waiting Times for Adult ESL Classes and the Impact on English Learners*, (National Association of Latino Elected and Appointed Officials, June 2006), p. 3.

²³ New York Immigration Coalition. *Eager for English: How and Why New York’s Shortage of English Classes for Immigrants Should Be Addressed*, p. 1.

²⁴ Martinez, T. and Wang, T. *Supporting English Language Acquisition: Opportunities for Foundations to Strengthen the Social and Economic Well-Being of Immigrant Families*, p. 12.

²⁵ Tolbert, M. *English Literacy and Civics Education for Adult Learners*, p. 18-23.

²⁶ Becker, A. and Wrigley, H.S. *Citizenship Education in Illinois: What Works?* (Chicago: Illinois Department of Human Services, August 2000), p. 70-82.

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. In total, fifty-six recommendations are offered in this chapter to expand and improve ESL and citizenship instruction within the scope of a national citizenship program.

2.6 *Lack of Federal Leadership and Funding for Naturalization and English Services*

These characteristics of vulnerability and subsequent challenges to naturalization will be exhibited, likely in to an even greater degree, by the millions of undocumented people who may legalize if a bill passes offering a path to citizenship. The physical presence of the undocumented is even more scattered throughout the country, with many in communities that lack a sufficient infrastructure to expand services to teach English and civics and provide affordable legal immigration services for naturalization on a larger scale.

While the federal government plays a dominant role in regulating immigration, it continues to lack an immigrant integration policy to match. As a result, states in partnership with private organizations are cobbling together funding, policies and program initiatives on everything from ESL for early arriving immigrant school-age children to citizenship classes and voter registration for immigrant adults who have lived in the U.S. for five years or more.

From 2001 to 2006, there has been a severe decline in funding for naturalization compared to a decade ago. This includes federal, state, local, and philanthropic funding. The states of Illinois and California are two exceptions. Both states allocated \$3 million for their current fiscal years for naturalization services.

There is no federal funding for direct naturalization assistance. The Office of Refugee Resettlement within the Department of Health and Human Services provides indirect assistance through a \$200,000 citizenship and civic participation technical assistance grant for refugees, approximately 9 percent of the total U.S. immigrant population.

The Department of Education spends only \$70 million per year to help teach English and civics education to the millions of limited English speakers. Even so, this money is usually directed to community colleges and adult basic education programs and rarely to community based

organizations that have more access to the poorest of the immigrant population. Furthermore, the Department of Education does not require the curricula to be linked to naturalization, helping immigrants understand naturalization eligibility, the application process, or preparing for the naturalization test.

The Office of Citizenship in the Department of Homeland Security was established in 2002. It has a peculiar location within the federal government but an admirable mission. However, it has a paltry budget of \$3.2 million covering only bare staff operations and no funds for widespread distribution of free promotional or educational materials. It is important to note that these funds come solely from fees paid by immigrants to U.S. Citizenship and Immigration Service for immigration benefit applications. The amount of \$3.2 million for the nation is shockingly small compared to the same amount spent by the states of Illinois and California respectively. Furthermore, the Office of Citizenship has no direct spending authority or budget for grant making to community based organizations.

2.7 *Past U.S. Efforts to Naturalize Immigrants*

Unfortunately, the United States has not experienced a long-standing, positive period of endorsing citizenship. One period, the “Americanization Movement” in the early 20th Century induced hundreds of thousands of immigrants to learn English, history and civics and become naturalized citizens. This was achieved through educational materials developed by the federal government and wide-spread partnerships formed with private organizations. Yet, the naturalization work done under the Americanization Movement had a troubling foundation and implementation flaws. It was begun chiefly out of concern that immigrants would retain their native languages, habits and political values perceived as counter to American traditions and democracy. These concerns increased when the U.S. entered into battle in WWI against powers in Europe, where most immigrants had come from. The Americanization Movement also used, at times, demagoguery, coercion and derision to promote immigrant assimilation.

The most productive period in promoting citizenship since came 80 years later in the mid-1990s. The passage of anti-immigrant legislation, Proposition 187 in California, gave immigrants fear of losing access to benefits without citizenship status. In the mid-1990s, the INS launched a naturalization initiative, “Citizenship USA.” This initiative expanded public information promoting citizenship and piloted government models to streamline the naturalization process. Citizenship USA became embroiled in controversy when a few members of Congress raised accusations that the INS initiative was designed to support President

Clinton's 1996 re-election campaign. Also, allegations of fraud were raised against some federal immigration subcontractors engaged in English testing and fingerprint taking for naturalization applications. A federal investigation revealed a small level of fraudulent activities that helped bring down the entire national initiative.

In 1996, Congress passed welfare reform legislation that limited non-citizen access to public, means-tested income and health care benefits. Shortly thereafter, Mr. George Soros, a billionaire immigrant philanthropist, donated \$50 million of his private funds to his own foundation, the Open Society Institute, which in turn, established the Emma Lazarus Fund. The Fund supported a wide network of charitable organizations to help immigrants become citizens and learn English for the naturalization test. The programmatic and numerical impact was significant.

The Emma Lazarus Fund for naturalization was depleted within a few years and very little naturalization work was sustained thereafter; another short-lived effort. The Emma Lazarus Fund was a missed opportunity by advocates and elected officials to set forth a national citizenship program, a program that would achieve many benefits for immigrants and our nation's democracy. Unfortunately, the achievements from Mr. Soros' generous funds were made at a time of sour attitudes about immigrants in Congress. Regrettably, Congress continues to overlook the opportunity to promote citizenship and immigrant integration. Furthermore, it continues to tarnish the meaning of citizenship by coupling its honor with eligibility by the poor to receive federal and state support for basic needs such as food, housing and health care.

2.8 *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. 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.

2.9 *What a National Citizenship Plan Can Achieve*

A national citizenship plan as presented in *A More Perfect Union: A National Citizenship Plan* will: 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 more English as a second language (ESL) funding and expanded 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.

2.10 *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.

3 Priority Recommendations for a National Citizenship Plan

3.1 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.

3.2 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.

3.3 *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.

3.4 *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.

3.5 *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.

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