

Barriers to Naturalization: A Review of the Literature

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PREFACE

U.S. Citizenship and Immigration Services (USCIS) is the government agency that administers lawful immigration to the United States. Since 2003, USCIS has operated within the U.S. Department of Homeland Security (DHS) and has been responsible for the federal government's immigration services, including naturalization oversight. USCIS upholds America's promise as a nation of welcome and possibility with fairness, integrity, and respect for all we serve. The USCIS home page address is <https://www.uscis.gov>.

The Strategy and Evaluation Division (SED) within the Office of the Chief Financial Officer (OCFO) at USCIS coordinates and conducts significant evaluation activities to identify problems and improve the efficiency and effectiveness of USCIS programs and policies. We strive to make our products available in a variety of formats and in language that is appropriate to a variety of audiences.

USCIS contracted the Federal Research Division (FRD) at the Library of Congress for research and analytical support to prepare this literature review on the barriers to naturalization both before and after starting the application process. The analysis in this report is based upon a literature review of research published within a fifteen-year period from 2008 to 2022. This included peer-reviewed research published in current periodicals and scholarly journals, reports published by nongovernmental organizations, and other information published online.

FRD provides customized research and analytical services on domestic and international topics to agencies of the U.S. government, the District of Columbia, and authorized federal contractors on a cost-recovery basis. This report represents an independent analysis by FRD and the authors, who have sought to adhere to accepted standards of scholarly objectivity. It should not be considered an expression of an official U.S. government position, policy, or decision.

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EXECUTIVE SUMMARY

In July 2022, the Evaluation Branch of the Strategy and Evaluation Division in the Office of the Chief Financial Officer within U.S. Citizenship and Immigration Services (USCIS)—a component of the U.S. Department of Homeland Security (DHS)—engaged the Federal Research Division (FRD) within the Library of Congress to perform a study on how people who apply for naturalization differ from those who do not apply. As part of this study, FRD performed a review of the literature to identify current knowledge on barriers to naturalization for eligible applicants both before and after initiating the naturalization application.

The two primary objectives for this literature review were to identify:

1. Barriers before initiating the naturalization application process, including predatory service providers, lack of assistance when needed, misinformation about the process, costs/fees associated with the process, legal issues within one's country of origin, and confusion regarding eligibility.
2. Barriers after starting the naturalization application process, including but not limited to the bureaucratic obstacles to the applicant (if a person tried to apply and gave up), such as application formats, system filters that prevent application, and language barriers.

Key Findings

Based on its review of the literature, FRD identified eleven key findings:

1. While naturalization applications and naturalizations have risen over time, there is a gap between the total eligible-to-naturalize population and the number of individuals who naturalize. For example, from 2015 to 2019, there were over 8 million individuals eligible to naturalize each year; however, the number of individuals who naturalized never surpassed 9.3 percent of the total eligible-to-naturalize population.¹
2. Adults who may be eligible to naturalize frequently cite the cost of the naturalization application as a primary reason for not initiating the naturalization application, according to surveys of immigrants from various states across the United States, including California, Texas, and New York.² For example, historical fee increases in 1998, 2007, and 2011 resulted in initial spikes in the numbers of applications submitted between the announcements of the increases and the fees going into effect. These spikes were followed by major declines in the numbers of applications submitted after the fee increases went into effect, suggesting that the decision to naturalize is price sensitive.³

3. Experimental studies support the conclusion that application cost remains a significant barrier to initiating the naturalization application process. For instance, one study found that when immigrants were provided a voucher that waived the application fee, application rates increased by 41 percent.⁴
4. Experimental designs reveal that lack of access to information about the naturalization process may prevent some eligible immigrants who are price sensitive to application fees from initiating the naturalization application. For example, one study found that an information campaign about fee waiver eligibility increased naturalization rates in a low-income population by 35 percentage points.⁵
5. In several observational studies, immigrants cite English language proficiency as a critical barrier prior to initiating the naturalization application. One analysis of the eligible-to-naturalize population found that individuals who speak English well or very well are 130–150 percent more likely to naturalize than those with limited English language skills.⁶
6. Living in highly assimilated immigrant communities can play a role in helping or hindering the eligible population prior to initiating the naturalization application. Lawful permanent residents (LPRs) who live in immigrant community enclaves with developed networks among persons with culturally similar backgrounds may receive information or guidance from naturalized community members.⁷ Comparatively, LPRs who live in less-assimilated communities are less likely to naturalize.⁸
7. Educational attainment can be a key indicator of the probability to naturalize. Individuals without a high school diploma or those with a high school level of education are less likely to naturalize than individuals with some college education or an advanced degree. One 2019 analysis of the naturalized population found that those who attain some college education or a bachelor's degree have a 30–35 percent higher probability of naturalizing than those who do not.⁹
8. Approval rates for naturalization applications remain high. Since 2009, around 86–87 percent of applications have been approved annually, indicating that barriers to initiating the naturalization application may be more of an impediment than barriers after starting the naturalization application.¹⁰
9. After starting the naturalization application, some applicants find the application and adjudication process (including the N-400 form text itself) confusing and complex.¹¹ For example, 35 percent of eligible-to-naturalize immigrants considered lack of information on how to complete the application a top obstacle in naturalizing, according to a 2013 survey of local immigrant legal service providers in Boston. Subsequent interviews confirmed that they found the N-400 language complex.¹²

10. A 2022 study found that certain demographic factors are correlated with differences in naturalization approval rates. Specifically, Black or African American applicants, Hispanic applicants, male applicants, and applicants from Muslim-majority countries face lower naturalization approval odds than non-Hispanic White applicants, female applicants, and applicants from non-Muslim-majority countries.¹³ It is unknown why these disparities exist; while this study finds a correlation, there is no supporting evidence to suggest that applicants' race/ethnicity, gender, or country of origin are the cause for their denial.
11. USCIS policies in the late 2010s, some of which have been superseded by new guidance, may have contributed to time delays or deterred applicants due to additional review criteria for naturalization applications during this time period. These policies include, in particular, those addressed by USCIS Policy Alerts on April 27, 2021, regarding deference to prior determinations of eligibility in requests for extensions of petition validity, and on June 9, 2021, regarding Requests for Evidence and Notices of Intent to Deny.¹⁴ Some reports by academics, immigration legal experts, and the Colorado State Advisory Committee to the U.S. Commission on Civil Rights find transparency issues in the adjudication process contribute to time delays as well.¹⁵

Recommendations for Future Research

FRD developed the following eleven recommendations for future research:

1. Developing experimental or quasi-experimental studies is necessary to identify causal relationships between a possible barrier and potential applicants prior to initiating the naturalization application. There is a significant dearth of causal studies in this realm.
2. Further rigorous research is needed to explain the additional barriers low-income immigrants face prior to initiating the naturalization application process beyond cost and information access.
3. While there is no one solution that addresses the issues presented by the identified barriers, further research is needed on possible ways to alleviate these obstacles, such as increasing financial aid to naturalization seekers and providing education on the naturalization process to eligible applicants with limited English proficiency.
4. Further research into the effects of fee increases in recent decades using American Community Survey data may help develop a clearer understanding of price sensitivity among those eligible to naturalize.

5. More research into explanations for the differences in naturalization rates between refugees and non-refugee LPRs is necessary to identify specific barriers faced by non-refugee LPRs.
6. Future research is needed to determine whether the increased use of virtual immigration services, especially since the COVID-19 pandemic, has affected eligible LPRs' access to immigration service providers and alleviated some of the barriers to naturalization caused by information access disparities. This research could include interviews of immigration service providers and other organizations providing these virtual services.
7. Future research should compare the different reasons among eligible individuals for not initiating the naturalization application, or for starting the naturalization application and dropping out. Demographic characteristics to disaggregate include income, English language proficiency, educational attainment, and country of origin. In particular, FRD recommends conducting interviews with individuals who may be eligible to naturalize and individuals who have started the naturalization application to determine what effect these factors had upon their decision to naturalize.
8. Research on applicants' understanding of the N-400 form and any areas of confusion could serve as a first step toward removing barriers associated with the form's complexity.
9. More research, specifically research utilizing experimental methods, examining the differences in naturalization application approval rates across different demographics—specifically race/ethnicity, gender, religion, income, and education—is needed to understand the root causes of these differences.
10. Research confirming if backlog or processing delays deter potential applicants from applying for naturalization also is necessary. Prioritization of an experimental or quasi-experimental design to confirm a causal relationship would be particularly helpful.
11. Examining the role of current USCIS policies as barriers to naturalization may be necessary as recent research mostly focuses on policies from the late 2010s, which have since been superseded. These policies include, in particular, those addressed by USCIS Policy Alerts on April 27, 2021, regarding deference to prior determinations of eligibility in requests for extensions of petition validity, and on June 9, 2021, regarding Requests for Evidence and Notices of Intent to Deny.¹⁶

TABLE OF CONTENTS

PREFACE.....	i
EXECUTIVE SUMMARY	ii
Key Findings	ii
Recommendations for Future Research.....	iv
1. INTRODUCTION	1
1.1. Methodology.....	2
1.2. Key Terms and Definitions.....	4
1.2.1. Adjudication Process	4
1.2.2. Eligible LPR	4
1.2.3. Eligible to Naturalize.....	4
1.2.4. Foreign Born	4
1.2.5. Immigrant.....	5
1.2.6. Immigration Service Provider	5
1.2.7. Lawful Permanent Resident.....	5
1.2.8. Migrant.....	5
1.2.9. Naturalization	5
1.2.10. Naturalization Process	6
1.2.11. Naturalization Application Process.....	6
1.2.12. Form N-400/Application.....	6
1.2.13. Refugee	6
1.3. Naturalization Primer	7
1.3.1. Reasons for Naturalizing	8
1.3.2. Naturalization Requirements.....	8
1.3.3. Naturalization Trends	10
1.3.4. Applicant Demographic Characteristics	14
2. BARRIERS TO INITIATING THE NATURALIZATION PROCESS	16
2.1. Economic and Cost Barriers	16
2.1.1. Price Sensitivity of Naturalization and Effect of Fee Increases on Demand	17
2.1.2. Price Sensitivity of Naturalization and Use of Fee Waivers	22
2.2. Information Access Disparities	27
2.3. Social Factors.....	30
2.3.1. English Language Proficiency.....	31
2.3.2. Educational Attainment.....	32

2.3.3. Country of Origin	33
2.3.4. Family Dynamics and Other Demographic Factors	36
3. BARRIERS TO NATURALIZATION AFTER INITIATION OF THE APPLICATION	40
3.1. Complexity of Naturalization Application and Adjudication Process.....	40
3.2. Social Factors Influencing Naturalization Rates.....	42
3.3. Backlog and Increased Processing Times as a Barrier	43
3.4. Legal and Policy Barriers	46
3.4.1. Policies Increasing Adjudication Times.....	46
3.4.2. Decreased Transparency in Adjudicative Process.....	49
4. CONCLUSION AND RECOMMENDATIONS FOR FUTURE RESEARCH.....	51
Recommendations for Future Research	52
5. APPENDIX I: USCIS Form M-480 Naturalization Eligibility Worksheet	54
6. APPENDIX II: Flow Chart for Naturalization Process	58
7. NOTES	59

TABLE OF FIGURES

Figure 1. Foreign-Born Population of the United States (1850–2021)	11
Figure 2. Naturalization Applications Filed, Denied, and Accepted (FY1990–2020).....	12
Figure 3. Naturalized Foreign-Born Population Compared to Total Foreign-Born Population (1920–2019).....	13
Figure 4. Naturalized Individuals by Region of Birth Over Time (1970–2019).....	14
Figure 5. Foreign-Born Population by Origin Country and Citizenship Status, 2019	15
Figure 6. Selected Historical Immigration Services Application Fees (FY1994–2011).....	19
Figure 7. Record of N-400 Applications and Naturalizations by Year (1981–2011).....	20
Figure 8. N-400 Backlog (FY2017–22)	44
Figure 9. Pending N-400 Applications and Processing Times (FY2009–20)	45

1. INTRODUCTION

In July 2022, the Evaluation Branch of the Strategy and Evaluation Division in the Office of the Chief Financial Officer within U.S. Citizenship and Immigration Services (USCIS)—a component of the U.S. Department of Homeland Security (DHS)—engaged the Federal Research Division (FRD) within the Library of Congress to perform a study on how people who apply for naturalization differ from those who do not apply. As part of this study, FRD performed a review of the literature to identify current knowledge on barriers to naturalization for eligible applicants both before and after initiating the naturalization application. In particular, FRD sought to identify:

1. Barriers before initiating the naturalization application process, including predatory service providers, lack of assistance when needed, misinformation about the process, costs/fees associated with the process, legal issues within one's country of origin, and confusion regarding eligibility.
2. Barriers after starting the naturalization application process, including but not limited to the bureaucratic obstacles to the applicant (if a person tried to apply and gave up), such as application formats, system filters that prevent application, and language barriers.

The literature revealed that there is a gap between the number of individuals eligible each year to apply for naturalization and the number of naturalization applications. In fact, as demonstrated in Figure 3 in Section 1.3.3, a common finding among the literature is that naturalization rates are not keeping pace with the growth of the United States' total foreign-born population (the population from which eligible naturalization applicants are derived).

To understand the causes of this gap, FRD researchers first reviewed factors that impede or prevent a person's initiation of the naturalization application. These factors include demographic characteristics such as income, English language skills, education level, age, and family dynamics. However, other elements that serve as barriers to initiation of the application include policy issues, such as the fee for the N-400 naturalization application and the distribution of information relevant to the naturalization process and the benefits of citizenship.

While each factor presents unique challenges to the eligible-to-naturalize population, each eligible-to-naturalize individual may face a combination of barriers that prevents them from becoming a U.S. citizen. For example, English proficiency can impact an eligible-to-naturalize individual's access to information, and the cost of the application could be an additional barrier to initiation. Therefore, these barriers should be observed both as separate factors and as parts of a larger system in the naturalization process.

FRD researchers then examined the barriers to naturalization once an applicant begins the application for U.S. citizenship. Survey data suggest that some applicants find the naturalization application and adjudication process, including filling out the N-400 form itself, confusing and complex. Once the application is complete and sent to USCIS, research suggests that demographic characteristics, such as race/ethnicity, gender, and religion, are correlated with the likelihood of application approval; however, more research is necessary to confirm this finding.

Indeed, it is important to note that observational or nonexperimental studies cannot confirm causal relationships and FRD recommends, where possible, that future research focuses on experimental or quasi-experimental studies. Further, backlogs and processing delays can impede applicants by increasing the time they must wait for application adjudication; this especially can cause problems for those whose Lawful Permanent Resident (LPR) status may soon expire and those who wish to naturalize prior to anticipated policy changes. For example, policy changes in the late 2010s, some of which have been superseded, resulted in additional review criteria during the adjudication process.¹⁷ These changes, along with limited ways for applicants to contact USCIS field offices directly, may have contributed to further time delays and feelings of apprehension around applying. More research into how policies may be a barrier to naturalization is needed since most recent research focuses on these superseded policies. Additionally, some reports note that USCIS policy is insufficiently transparent, suggesting that applicants may struggle to inquire about their case's details or communicate with USCIS staff to resolve case issues, both of which may contribute to further time delays.

This report, which summarizes the findings of FRD's literature review, is organized into four primary sections. Section 1 provides context for the project's inception and enumerates the core research questions. It also describes the methodology used and includes a naturalization primer, which discusses the naturalization application process and important trends. Section 2 covers barriers to naturalization prior to initiating the application process. Section 3 reviews barriers to naturalization after starting the application. Lastly, Section 4 concludes the report and highlights literature gaps where more research is necessary.

1.1. Methodology

To summarize current knowledge on naturalization processes in the United States and to identify barriers to naturalization, the FRD research team drafted a literature review informed by a search of Library of Congress databases. These databases include but are not limited to EBSCO, JSTOR, ProQuest, GovInfo, and HeinOnline.

The FRD research team, in order to conduct the literature review, searched for studies published in scholarly, peer-reviewed journals and government reports. Additionally, the team scanned for relevant reports from nongovernmental organizations, such as the Migration Policy Institute and the Pew Research Center. FRD sought studies using a variety of research methodologies, including qualitative and quantitative studies (with an emphasis on experimental or quasi-experimental studies), to identify the current knowledge on barriers to naturalization for eligible applicants both before and after beginning the naturalization application. To be included in the literature review, a study generally had to be published in English within the past fifteen years (2008–2022); FRD did review certain seminal studies released prior to 2008 due to their importance in the literature.

As previously noted, the searches focused on two research questions. First, FRD sought to identify barriers to initiating the naturalization application process, including predatory service providers, lack of assistance when needed, misinformation about the process, costs/fees associated with the process, legal issues within a person’s country of origin, and confusion regarding eligibility. Second, FRD examined barriers after starting the naturalization application process, including but not limited to the bureaucratic obstacles to the applicant (if a person tried to apply and gave up), such as application formats, system filters that prevent application, and language barriers. FRD did not conduct any new empirical research for this literature review.

Keyword search terms consisted of Boolean search strings including the use of wildcards, truncations, and modifiers, such as the use of quotation marks for specific phrases. Search terms included but were not limited to variations of the following:

- Barriers to naturalization application;
- Naturalized immigrants;
- Citizenship-eligible lawful permanent residents;
- Naturalization process;
- Presidential administration change AND citizenship applications;
- Policy change AND citizenship applications;
- Cost of naturalization;
- Contributing factors to naturalization;
- Predatory service providers;
- Naturalization misinformation;
- Country of origin legal issues AND naturalization.

1.2. Key Terms and Definitions

This literature review references terminology used by USCIS, other federal agencies, and academic and non-academic sources. This section defines the key terms used throughout this report and describes how they are used in the context of this literature review.

1.2.1. Adjudication Process

This literature review uses “adjudication process” when referring to the stages of the naturalization process that occur after a person submits an application while USCIS reviews applications and verifies eligibility. Parts of the adjudication process include a civics exam and background check.

1.2.2. Eligible LPR

This literature review uses “eligible LPR” when referring to individuals with Lawful Permanent Resident (LPR) status who may be eligible for naturalization because they meet the legal residency requirements set out by the 1952 Immigration and Nationality Act (INA). As described in other definitions in this section, a small share of individuals can be eligible for naturalization through military service without becoming an eligible LPR.

1.2.3. Eligible to Naturalize

The phrase “eligible to naturalize” refers to all persons who may be eligible to initiate the naturalization process based on the legal requirements outlined in the INA. The eligible-to-naturalize population includes eligible LPRs, as well as individuals who may meet eligibility through other requirements, such as those who served in the military.

1.2.4. Foreign Born

The U.S. Census Bureau defines “foreign born” as “anyone who is not a U.S. citizen at birth, including those who become U.S. citizens through naturalization.”¹⁸ In this literature review, the term “foreign born” is used when referencing sources that utilize foreign-born population data. The U.S. Census Bureau, for example, collects data on all foreign-born individuals who participate in Census surveys regardless of their legal status. Consequently, this literature review sometimes uses “legal foreign-born” when referring to sources that cite data on foreign-born individuals residing in the United States legally. The legal foreign-born population includes naturalized U.S. citizens and LPRs.

1.2.5. Immigrant

The DHS Office of Immigration Statistics defines “immigrant” as “any person lawfully in the United States who is not a U.S. citizen, U.S. national, or person admitted under a nonimmigrant category as defined by the INA Section 101(a)(15).”¹⁹ This literature review uses the term “immigrant” when referencing sources that use it to broadly refer to a person or persons who immigrated to a different country, but who otherwise do not have a shared legal status or their legal status is unknown in the context of a specific study.

1.2.6. Immigration Service Provider

“Immigration service provider” (ISP) refers to any individual or organization that provides immigration services to the public. These services include providing educational materials, legal services, and assistance with preparing immigration forms.²⁰

1.2.7. Lawful Permanent Resident

LPR status is an important step prior to naturalization for most immigrants in the United States, and is a term referenced frequently throughout this literature review. This literature review uses the USCIS definition of “lawful permanent resident,” which defines an LPR as “any person not a citizen of the United States who is living in the U.S. under legally recognized and lawfully recorded permanent residence as an immigrant.”²¹

1.2.8. Migrant

USCIS defines “migrant” as “a person who leaves his/her country of origin to seek temporary or permanent residence in another country.”²² In this literature review, “migrant” is used when referencing studies that use the term when they do not (or cannot) provide a more specific description for the legal status of the studies’ participants.

1.2.9. Naturalization

The INA defines “naturalization” as “the conferring of nationality of a state upon a person after birth, by any means whatsoever.”²³ This literature review uses the term “naturalization” to generally refer to the process of obtaining citizenship by filing USCIS Form N-400, Application for Naturalization.

1.2.10. Naturalization Process

In this literature review, the phrase “naturalization process” is used to refer to the entirety of the U.S. naturalization process, starting from the decision to pursue naturalization and ending with a completed USCIS Form N-550, Certificate of Naturalization. This process includes the steps taken before an eligible-to-naturalize person initiates the N-400 application, such as deciding to pursue naturalization and speaking to an immigration attorney or immigration service provider. The process also includes steps taken after an eligible person submits an N-400 form, such as an English language test and civics test. More detail on the individual steps of the naturalization process is provided in the naturalization primer in Section 1.3.

1.2.11. Naturalization Application Process

“Naturalization application process” or “application process” is used in this literature review to refer to each step needed to complete the N-400 application. These steps include filling out and submitting the N-400 form, but do not include any steps in the naturalization process that occur prior to an applicant initiating the N-400 form.

1.2.12. USCIS Form N-400/Application

In this literature review, “USCIS Form N-400” or “N-400 application” refers to the official USCIS application for naturalization. This form must be completed and submitted to USCIS to initiate the naturalization process.

1.2.13. Refugee

This literature review uses the legal definition of the term “refugee” provided by USCIS, which is derived from the INA. “Refugee” refers to “any person outside his or her country of nationality who is unable or unwilling to return to that country because of persecution or a well-founded fear of persecution based on the person’s race, religion, nationality, membership in a particular social group, or political opinion.”²⁴ Importantly, “refugee” is a specific designated status that is distinct from other immigration statuses, so while all refugees are included under large umbrella terms such as “immigrant” or “migrant,” not all immigrants can be referred to as refugees.

1.3. Naturalization Primer

The term “naturalization” means “the conferring of nationality of a state upon a person after birth, by any means whatsoever,” as defined in the INA.²⁵ In the United States, naturalization is the process by which citizenship is granted to an applicant after meeting the requirements established by Congress in the INA.²⁶ Naturalization is almost exclusively utilized by LPRs, and within this report, FRD primarily refers to LPRs when discussing naturalization barriers. It is helpful to note, however, that not all applicants for naturalization need to be an LPR. For example, 98.8 percent of individuals naturalized in fiscal year (FY) 2021 were LPRs; the remaining 1.2 percent were military members (1.1 percent) and other individuals (0.1 percent).²⁷

Naturalization is a voluntary and permanent act, meaning that individuals who undergo naturalization are not required to do so. Further, naturalized citizens are not required to reaffirm or renew their citizenship continually, unlike LPRs who must regularly renew a Permanent Resident Card (informally known as a Green Card).²⁸

Naturalization may bestow many benefits both directly and indirectly upon naturalized individuals and others in their local area, state, and across the United States. Directly, naturalization gives individuals the right to vote in elections, the right to run for elected office requiring citizenship,ⁱ security from deportation, the ability to travel with a U.S. passport, the ability to transmit U.S. citizenship to their children, the ability to sponsor relatives to immigrate to the United States, and all other benefits and rights natural-born U.S. citizens enjoy.²⁹ Indirectly, some studies from the mid-2010s, which looked at the correlation between individuals’ earnings and citizenship, observed that naturalization is associated with increased earnings, increased homeownership rates, increased employment rates, and lower levels of poverty for naturalized individuals compared to non-naturalized individuals.³⁰

However, it is important to remember that these economic benefits are correlational, not causal, as there may be inherent differences between immigrants who choose to naturalize and those who do not that potentially bias the results. For example, eligible LPRs who choose to naturalize may have higher incomes than those who do not. One quasi-experimental study from the time period used a propensity score matching method with data from twenty-one U.S. cities and found that if all eligible LPRs were to naturalize, tax revenues would increase by \$2 billion; if just half of eligible LPRs naturalized, these naturalized citizens’ increased income and homeownership demand could boost the gross domestic product of the United States by as much as \$45 billion

ⁱ Naturalized citizens are not able to run for president.

per year.³¹ Still, causal research that accounts for selection bias is needed to test these findings further.

1.3.1. Reasons for Naturalizing

An individual's reasons for applying for naturalization vary. First, as discussed previously, there are several concrete benefits to naturalization, such as obtaining voting privileges, traveling with a U.S. passport, applying for federal jobs, and becoming an elected official.³² Eligible individuals also may be motivated to apply because they see citizenship as the next step in joining their host country's community.³³ Additionally, some individuals may be motivated to naturalize for social reasons, such as for benefits for their family or because of a favorable social and political climate that encourages naturalization.³⁴ Lastly, some individuals naturalize as a protective measure against real or perceived threats in their host country and to defend themselves from possible deportation.³⁵ Findings from a 2012 Pew Research Center survey on foreign-born Latino naturalized citizens support this list of motives. Specifically, in response to an open-ended question about their reason for naturalization, 18 percent of respondents said civil and legal rights, 16 percent said access to benefits and opportunities, 15 percent said family reasons, 12 percent said because the United States is their home, and 6 percent said they naturalized as a component of American identity.^{36,ii}

1.3.2. Naturalization Requirements

In order to naturalize, an applicant must fulfill a series of criteria outlined in the INA. In short, applicants must:

- **Be at least eighteen years old.**
- **Meet the continuous residency and physical presence requirements.** The applicant, in most cases, must have continuously resided in the United States for at least five years, although there are exceptions for children and spouses of U.S. citizens and U.S. military personnel. Additionally, the applicant must be physically present in the United States for at least half of their LPR residency period and have resided in the state or district of application for at least three months prior to their application, or prior to their naturalization interview if the applicant is taking advantage of early filing rules. The continuous residency requirement is not fulfilled if the applicant leaves the United States

ⁱⁱ The open-ended question resulted in many other individual reasons outside of these categories, including "Don't Know" and "Refused" responses.

for periods of more than one year, unless the applicant has an approved USCIS Form N-470, Application to Preserve Residence for Naturalization Purposes.^{37,iii}

- **Possess good moral character.** Applicants are required to demonstrate “good moral character” during a time period of usually five years prior to their application. This requirement is not fulfilled if an applicant commits certain illegal or immoral acts, such as aggravated felonies or, in some cases, acts like practicing polygamy, illegal gambling, or failing to pay child support.
- **Demonstrate an understanding of the English language.** During interviews, applicants are required to show English language skills in reading, writing, speaking, and comprehension. This requirement is waived for applicants who are at least fifty years old and have lived in the United States as an LPR for at least twenty years; applicants who are at least fifty-five years old and have lived in the United States as an LPR for at least fifteen years; and applicants who cannot satisfy these requirements due to a physical or developmental disability or mental impairment.
- **Demonstrate knowledge of U.S. government and history (civics).** During interviews, an applicant takes an oral exam testing their knowledge of U.S. government and history. Special consideration is given to individuals who are older than sixty-five and have lived in the United States as an LPR for at least twenty years. The civics requirements do not apply to applicants with physical or developmental disabilities or mental impairments who are unable to comply with them.³⁸ Due consideration is afforded to applicants on a case-by-case basis in choosing subject matters based on applicants’ age, background, level of education, etc.
- **Be willing to take the Oath of Allegiance.** Applicants must take an oath of renunciation and allegiance (Oath of Allegiance) in a public ceremony. Modification of the oath may be requested for individuals based on religious or conscientious objections. The requirement to take the Oath of Allegiance may be waived for applicants who are unable to understand or communicate an understanding of its meaning due to a physical or developmental disability or mental impairment.³⁹

ⁱⁱⁱ Approval for USCIS Form N-470, Application to Preserve Residence for Naturalization Purposes, is based on employment by the U.S. government, an international organization of which the United States is a member, a U.S. research institute, a U.S. company engaged in foreign trade, or a religious vocation. Prior to engaging in qualifying employment abroad, the applicant generally must be physically present and continuously residing in the United States as an LPR for at least one year. For military naturalizations, those serving during peacetime are not required to meet residency requirements if they apply within six months of their discharge; however, they must still be LPRs and must have served honorably for at least one year, and if discharged, they must reside in the United States from the termination of their service until the filing of the application for naturalization. For those serving honorably for any length of time during a designated period of hostilities, there are no residency requirements or application timing requirements. Further, individuals who serve during a designated period of hostilities are not required to be LPRs provided they enlisted or reenlisted in the United States. Most other requirements for military naturalizations are very similar to the general naturalization requirements, although there are other exceptions.

The process of applying for naturalization begins when the applicant files USCIS Form N-400, Application for Naturalization, and pays a \$640 filing fee and \$85 biometric fee.⁴⁰ There are fee waivers or reductions based on receipt of means-tested benefits, or for individuals with incomes at or below 150 percent of the Federal Poverty Guidelines or who can prove financial hardship. Additionally, some groups may receive exemptions (e.g., military members are exempt from fees).⁴¹ These fee reductions, which are discussed in further detail in Section 2.1, include a fee waiver reduction that lowers the cost of the N-400 application to \$320 for individuals whose household income is greater than 150 percent but less than 200 percent of the poverty line.⁴²

After filing the N-400, applicants then attend a required biometrics appointment in which their fingerprints, photograph, and signatures are taken in order to conduct a background check to verify their eligibility. After completing the background check, applicants are scheduled for and complete an interview, in which the applicant is tested on their English language proficiency and civics knowledge. If an applicant passes their background check, interviews, and exams and meets the requirements outlined above, they take the Oath of Allegiance to the United States in a naturalization ceremony before a judge or at USCIS.⁴³ After completing the oath, newly naturalized citizens receive USCIS Form N-550, the Certificate of Naturalization. A flow chart detailing this process is included in Appendix II.

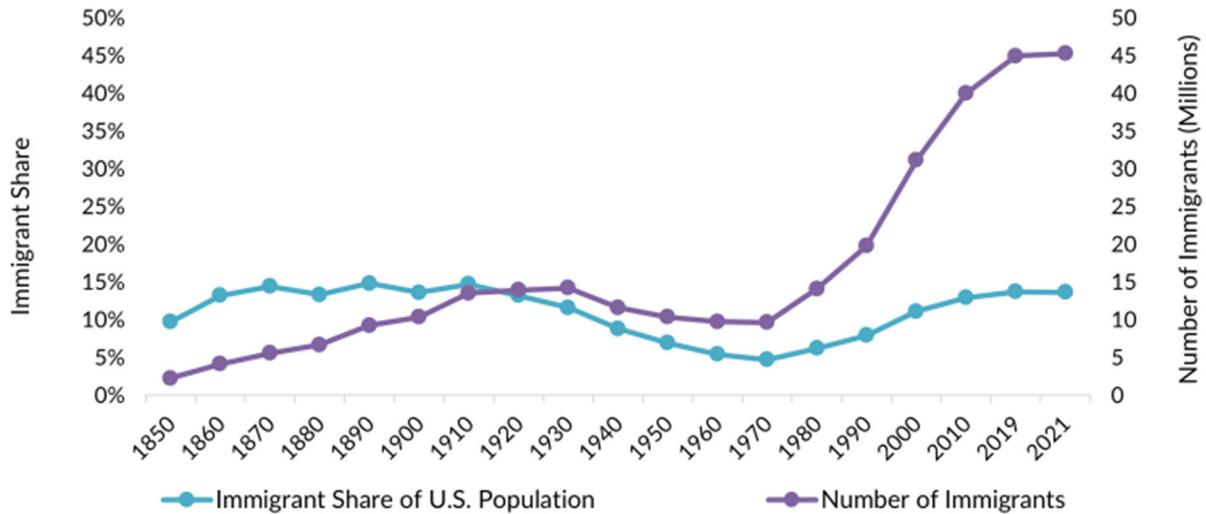
1.3.3. Naturalization Trends

Naturalization trends have shifted over time. In terms of naturalization applications, the number of applicants has risen over the past thirty years. This rise in applications mirrors the increase in the number of foreign-born residents of the United States, as can be seen in Figures 1 and 2. Figure 1 shows the foreign-born population grew from around 20 million in 1990 to around 45 million in 2021.⁴⁴ Figure 2 shows that in FY1990, 233,843 individuals applied for naturalization, compared with 967,755 individuals who applied for naturalization in FY2020.⁴⁵

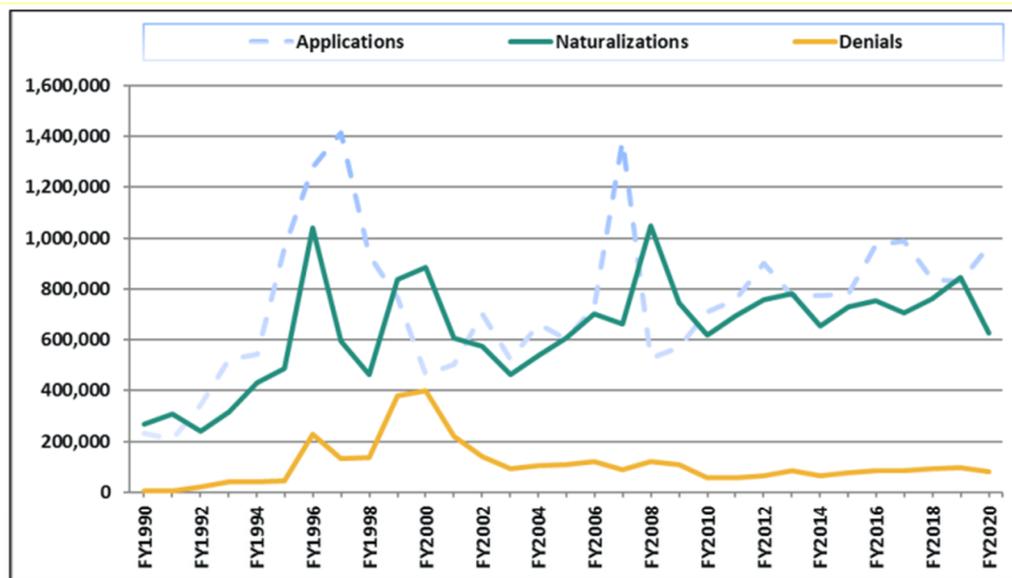
In FY1997, naturalization application volume reached a peak, reflecting the impact of legislation such as the Immigration Reform and Control Act of 1986 (IRCA), which legalized around 2.8 million LPRs between 1986 and 1989, and the Immigration Act of 1990, which increased limits on legal immigration and subsequently increased application volume throughout the mid-1990s. The full impact of these two legislative acts was not borne out until FY1997 due to the time needed for new LPRs legalized by the IRCA to meet the residency requirements for naturalization. Other studies have suggested the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) also played a part in this 1997 surge. The act reduced non-naturalized immigrants' access to welfare benefits, which may have, consequently, incentivized some to naturalize.⁴⁶

Application volume peaked again in FY2007, reflecting the large volume of LPRs who applied for naturalization in advance of the 2008 election and in anticipation of a fee increase that took effect in July 2007. This surge demonstrates a common trend that naturalization applications generally rise in advance of fee increases, general elections, and either before or after major legislative or policy changes go into effect.⁴⁷

Figure 1. Foreign-Born Population of the United States (1850–2021)



Source: Nicole Ward and Jeanne Batalova, “Frequently Requested Statistics on Immigrants and Immigration in the United States,” Migration Policy Institute, March 14, 2023, <https://www.migrationpolicy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states>.

Figure 2. Naturalization Applications Filed, Denied, and Accepted (FY1990–2020)

Sources: FY1990-FY2019: DHS Office of Immigration Statistics, *2019 Yearbook of Immigration Statistics*, Table 20. FY2020: USCIS, "All USCIS Application and Petition Form Types (Fiscal Year 2020, 4th Quarter, Jul. 1-Sep 30, 2020)."

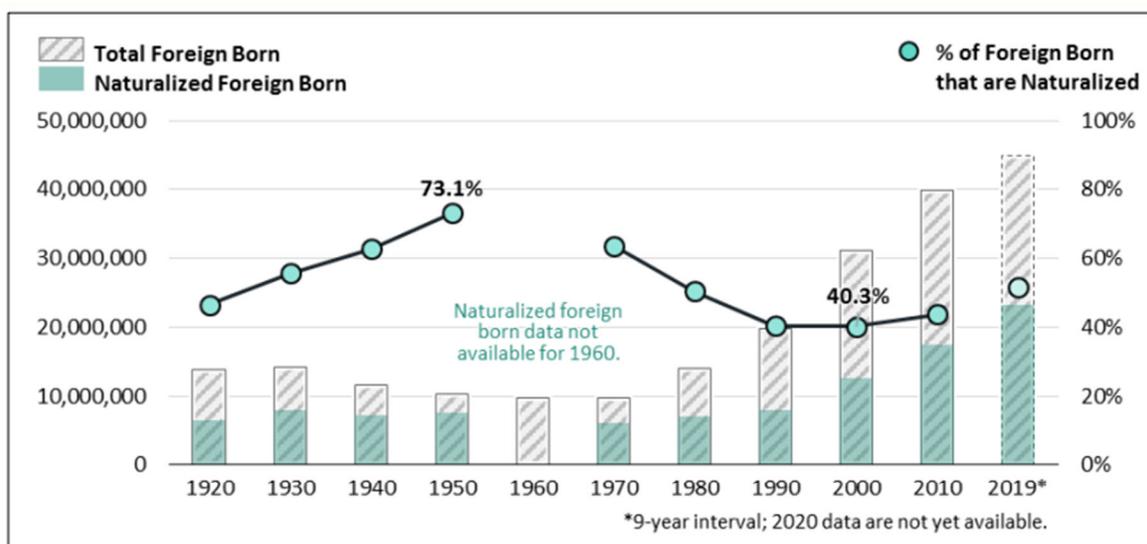
Notes: Because DHS *Yearbook of Immigration Statistics* data are not yet available for FY2020, FY2020 naturalizations shown are represented by approved Forms N-400 published by USCIS. These two data sources closely correspond.

Source: Holly Straut-Eppsteiner, *U.S. Naturalization Policy*, CRS Report for Congress R43366 (Washington, DC: Library of Congress, Congressional Research Service [CRS], updated May 3, 2021), 16, <https://crsreports.congress.gov/product/pdf/R/R43366>.

Similar to application numbers, approved naturalizations have risen over the past thirty years, roughly mirroring the trends in applications since denial numbers have stayed roughly flat, as seen in Figure 2. In 2021, there were 814,000 approved naturalizations, up from an average of 500,000 in the 1990s, 680,000 in the 2000s, and 730,000 in the 2010s.⁴⁸ When examining naturalization rates (i.e., the percentage of LPRs who became naturalized citizens), a USCIS report from 2016 indicates that rates of naturalization are increasing. Comparing six-, ten-, and twenty-year naturalization rates (i.e., the number of individuals who spend six, ten, and twenty years as LPRs before naturalization), USCIS found that all three measures increased on average from the 1973 LPR cohort to the 2008, 2004, and 1994 LPR cohorts—increasing from 19.8 percent to 34.7 percent, 31.4 percent to 54.3 percent, and 41.7 percent to 61.7 percent for the six-, ten-, and twenty-year rates, respectively.⁴⁹ The trend from this data reveals that naturalization rates for eligible individuals have increased over time since the mid-to-late 20th century.

Yet, while naturalization rates are increasing, the gap between the naturalized foreign-born population and the total foreign-born population is still substantial and is greater than it was in the 1950s, as can be seen in Figure 3. In 1950, 73.1 percent of the total foreign-born population in the United States naturalized; however, by 2019, only 51.6 percent of the total foreign-born population had naturalized.⁵⁰

Figure 3. Naturalized Foreign-Born Population Compared to Total Foreign-Born Population (1920–2019)



Sources: 1900-2000: Campbell Gibson and Kay Jung, “Historical Census Statistics on the Foreign-Born Population of the United States: 1850 to 2000,” U.S. Census Bureau Population Division (February 2006). 2010 and 2019: CRS analysis of American Community Survey data, Table B05001, at <https://data.census.gov/cedsci/>.

Notes: The 1960 Decennial Census did not ask respondents about their citizenship status. See Guillermina Jasso and Mark R. Rosenzweig, *The New Chosen People* (New York: Russell Sage Foundation, 1990), p. 105.

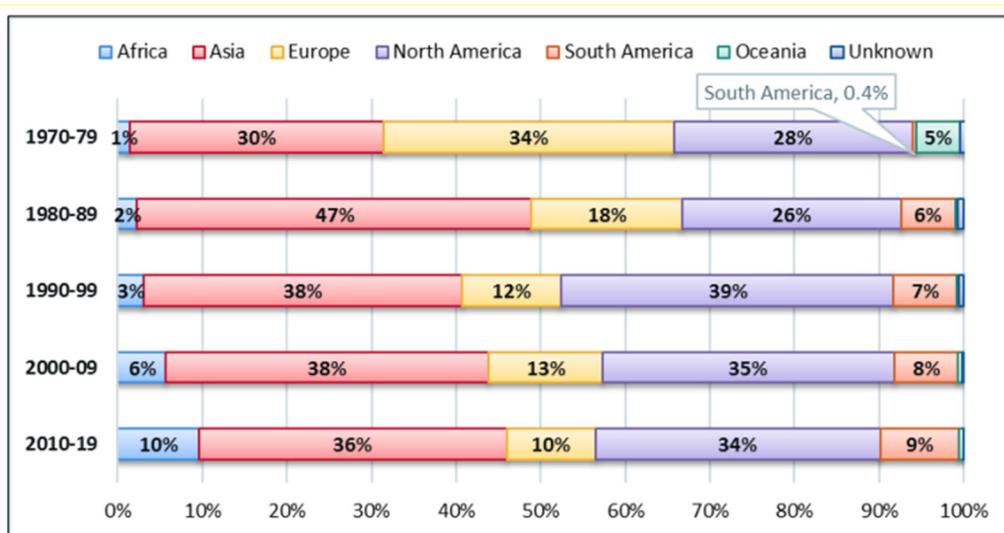
Source: Holly Straut-Eppsteiner, *U.S. Naturalization Policy*, CRS Report for Congress R43366 (Washington, DC: Library of Congress, CRS, updated May 3, 2021), 19, <https://crsreports.congress.gov/product/pdf/R/R43366>.

A similar and common finding in naturalization research is that naturalization rates are not keeping pace with the growth of the LPR population, a more specific subset of the total foreign-born population. For example, in 2019, there were approximately 9.2 million individuals who may have been eligible to naturalize, according to the DHS Office of Immigration Statistics.⁵¹ In FY2019, USCIS received 830,560 applications for naturalization, or about 9 percent of the total eligible LPR population.⁵² While “9.2 million” represents the number of total eligible LPRs as accumulated over decades, this comparison demonstrates that only a small percentage of eligible LPRs apply for naturalization in any given year. When examining both the total foreign-born population and eligible LPRs, there is a gap between these population sizes and the numbers of individuals applying for naturalization.

1.3.4. Applicant Demographic Characteristics

Naturalization applicant demographic characteristics also have changed over time, as can be seen in Figure 4. In the 1970s, for example, the plurality of naturalized individuals came from Europe. Over time, the proportion of naturalized individuals from Europe decreased while the proportion of naturalized individuals from African and South American countries increased. Since the 1980s, Asian immigrants have represented the plurality of naturalized individuals. The one exception is between 1990 and 1999, when immigrants from North America represented the plurality.⁵³

Figure 4. Naturalized Individuals by Region of Birth Over Time (1970–2019)



Sources: 1970: *Immigration and Naturalization Service 1975 Annual Report*. 1971-1980: *1980 Statistical Yearbook of the Immigration and Naturalization Service*. 1981-1990: *1990 Statistical Yearbook of the Immigration and Naturalization Service*. 1991-2000: *2000 Statistical Yearbook of the Immigration and Naturalization Service*. 2001-2010: DHS, *2010 Yearbook of Immigration Statistics*. 2011-2019: DHS, *2019 Yearbook of Immigration Statistics*.

Source: Holly Straut-Eppsteiner, *U.S. Naturalization Policy*, CRS Report for Congress R43366 (Washington, DC: Library of Congress, CRS, updated May 3, 2021), 18, <https://crsreports.congress.gov/product/pdf/R/R43366>.

In 2021, the greatest numbers of naturalized individuals in that year came from Mexico (113,000), India (57,000), Cuba (48,000), the Philippines (48,000), and China (29,000). This finding reflects a slight change from FY2009 to FY2014, when the Dominican Republic was in the top five instead of Cuba.⁵⁴ These naturalization numbers mostly match the foreign-born populations with the largest numbers of potentially eligible-to-naturalize LPRs: Mexico, China, Cuba, the Dominican Republic, and India. Interestingly, as visualized in Figure 5, foreign-born individuals from Mexico—despite making up the largest number of potentially eligible-to-naturalize individuals—have among the lowest naturalization rates, along with foreign-born individuals from Brazil and Central American countries, such as El Salvador, Guatemala, and Honduras, all of which are below 35 percent. Foreign-born populations from Vietnam, Iran, Poland, and the Philippines, on the other

hand, have the highest naturalization rates, exceeding 70 percent.⁵⁵ In addition to country of origin, naturalization rates vary by individual characteristics such as time spent in the United States and socioeconomic indicators such as income, education, and English language proficiency, all of which are positively correlated with naturalization rates.⁵⁶

Figure 5. Foreign-Born Population by Origin Country and Citizenship Status, 2019
 25 largest national origins, listed in order of U.S. population size (each square represents 100,000 people)



Source: 2019 American Community Survey (ACS) Public Use Micro Sample (PUMS), U.S. Census Bureau.
Note: Populations are rounded to the nearest 100,000.

Source: Holly Straut-Eppsteiner, *U.S. Naturalization Policy*, CRS Report for Congress R43366 (Washington, DC: Library of Congress, CRS, updated May 3, 2021), 21, <https://crsreports.congress.gov/product/pdf/R/R43366>.

In order to explain differences in naturalization rates, the literature offers many hypotheses and theories. In the next section, this report explores barriers prior to initiating the naturalization application, examining differences between those who do and do not apply for naturalization. Following that, the report explores barriers to naturalization after initiating the naturalization application.

2. BARRIERS TO INITIATING THE NATURALIZATION PROCESS

While there are many potential benefits to citizenship, including psychological benefits associated with a secure citizenship status, access to federal benefits programs, and citizenship benefits extended to family members, eligible-to-naturalize individuals may not initiate the naturalization process if they anticipate that the costs of the naturalization process will outweigh the benefits associated with citizenship. Such anticipated costs can include the direct costs of application fees, potential costs of legal and other assistance, and less tangible costs, such as the length of time spent navigating the naturalization process, a loss of ties to one's homeland, or a change in identity.⁵⁷ However, even in cases where eligible-to-naturalize individuals determine that the anticipated costs are less than the benefits of naturalization, they still may be prevented from initiating the citizenship process due to issues outside of their control, such as legal obstacles and systemic factors that impact English language proficiency and educational attainment.

The following section considers the ways in which different factors affect the eligible-to-naturalize population prior to initiating the naturalization application. It is divided into three subsections: economic and cost barriers, information access disparities, and social factors. Each subsection includes information describing how each type of barrier affects naturalization rates and lists specific factors within each barrier that deter eligible-to-naturalize individuals from initiating the naturalization process. Because these barriers are interconnected, overlap may occur between the subsections.

2.1. Economic and Cost Barriers

Several studies reveal that eligible-to-naturalize individuals most frequently cite application fees and related costs as reasons for not pursuing naturalization. A 2012 survey conducted by the Pew Research Center, for example, found that 96 percent of Latino LPRs claimed that they would be interested in naturalizing "if they could." Of this 96 percent, 18 percent cited financial and administrative barriers to pursuing citizenship.⁵⁸ These findings align with a previous survey conducted nine years prior, which found that among eligible-to-naturalize LPRs residing in Texas, 20 percent cited cost as a barrier to applying for citizenship.⁵⁹ Additionally, academic scholars who conducted randomized controlled trial experiments with eligible-to-naturalize LPR populations in New York City have observed that immigrants in low-income households are less likely to naturalize.⁶⁰

Overall, cost-related barriers can be attributed to two main factors: the price of the naturalization application and the fact that, in 2019, 14.7 percent of the eligible-to-naturalize population lived below the poverty threshold. More specifically, 1,187,158 eligible-to-naturalize individuals hold relatively low amounts of expendable income, which may make it more difficult to bear costs throughout the naturalization process.⁶¹ As of October 2023, the total base price of naturalization is \$725, which includes both the \$640 N-400 application fee and the \$85 fee for required biometric testing for individuals under seventy-five years of age.⁶² In addition to the base price of the application, the process of naturalizing may require individuals to incur additional costs due to time spent preparing for and going through the naturalization process. Some immigrants may face additional costs from classes, such as English language classes, to help prepare for the citizenship process. Some immigrants also choose to engage attorneys to help them through the naturalization process, which can incur additional fees. A sampling of fees charged by immigration attorneys shows that these additional costs can range from \$850 to \$2,500.⁶³

2.1.1. Price Sensitivity of Naturalization and Effect of Fee Increases on Demand

Despite the frequency with which surveys of eligible-to-naturalize LPRs cite cost-related issues as a barrier to naturalization, there is a debate in existing literature over whether the eligible-to-naturalize population's decision to naturalize is price sensitive. Price sensitivity describes a consumer's willingness to pay for a good or service.^{iv} For instance, a 2007 report by the Congressional Research Service (CRS) studied the observed effects of fee increases on the numbers of immigration forms submitted to USCIS from 1998 to 2007. It concluded that the overall "fee increases have little to no effect on demand [for USCIS immigration services]."⁶⁴ A related 2010 report by CRS concluded that the "relationship between fees and [USCIS processing] workload remains unclear."⁶⁵ The lack of a clear effect on USCIS's workload suggested to CRS researchers that potential applicants were not deterred by price increases for various immigration forms and applications, including the N-400 naturalization application. Similar evidence regarding the limited effect of price relative to decreases in the volume of N-400 applications following fee increases in 2007, 2010, and 2016 led DHS also to conclude that "price elasticity for immigration services is inelastic and increases in price will have no impact on the demand for these services."⁶⁶

^{iv} In the case of the naturalization application, price sensitivity refers to the eligible-to-naturalize population's willingness to pay for the cost of the naturalization application. Eligible-to-naturalize individuals who are less price sensitive are more willing to pay a higher price for the cost of the naturalization application. Comparatively, eligible-to-naturalize individuals who are more price sensitive are less willing to pay high prices for naturalization and may choose not to naturalize if they determine that the cost of the naturalization application is too high.

However, other scholars have pushed back against these conclusions to argue that the decision to naturalize is price sensitive. A 2013 report for the Center for the Study of Immigrant Integration (CSII) at the University of Southern California provides one of the most in-depth counterarguments against the conclusions made in the CRS reports. In this CSII report, Manuel Pastor and his coauthors argue that the demand for naturalization “is not a traditional market and the usual techniques of estimating a demand curve—the relationship between price and quantity demanded—are not generally possible.” According to Pastor et al., conclusions made about price sensitivity derived from the CRS studies are not definitive because the studies’ methodology is flawed:

1. **First, the CRS reports focus on “the relationship between fee increases and total USCIS workload and services.”** By not focusing specifically on the relationship between application fee increases and naturalization, the CRS reports failed to account for the fact that many application forms (including USCIS Form I-90 to replace a Permanent Resident Card, USCIS Form I-129 to petition for a nonimmigrant worker, USCIS Form I-130 to petition for an alien relative, USCIS Form I-485 to apply for LPR status, and USCIS Form I-765 to apply for employment authorization) are filed out of necessity in order for a person to work and reside in the United States legally. Unlike naturalization applications, immigrants do not have alternative options to filing these other forms and, consequently, the price sensitivity for these forms is very inelastic (i.e., demand is unresponsive to price changes). This inelasticity potentially skews findings from the data because legal alternatives to naturalization, such as renewing a Permanent Resident Card, make the demand for naturalization forms comparatively more elastic (i.e., demand is responsive to price changes).
2. **Second, the 2007 CRS report began its data analysis starting with the year 1998.** By starting with this year, the data analysis cannot capture the full extent of the impact of the FY1998 fee increase. Additionally, Pastor et al. argue that within the timeframe of the scope of CRS’s analysis, the FY1998 fee increase is much higher than the other fee increase introduced in FY2004 and, therefore, “should have been given special attention.”
3. **Third, both CRS reports indicated that the fee increase that was introduced in FY1998 occurred in FY1998.** However, this fee increase was implemented in October 1998, which is the start of FY1999. Consequently, Pastor et al. argue that the 1998 fee increase should be assigned to FY1999, as is demonstrated in Figure 6. For similar reasons, Pastor et al. assign the 2010 fee increase to FY2011 because it was introduced in November 2010 (i.e., FY2011).
4. **Fourth, the 2010 CRS report compared the rate of N-400 applications to the total number of all immigration applications (including the N-400 application) submitted over a given year.** Pastor et al. argue that because N-400s comprise a relatively low percentage of all applications submitted in a given year, analysts should instead compare

the rate of N-400s to the rate of “all other applications (excluding N-400s)” submitted in a given year. Comparing the rate of submissions of N-400 applications and the rate of submissions of other immigration applications, including the I-90 form that renews LPR status, allows analysts to measure if eligible LPRs are deciding to maintain their LPR status rather than pursuing naturalization.⁶⁷

Figure 6. Selected Historical Immigration Services Application Fees (FY1994–2011)

Form	FY 1994	FY 1999	% Diff	FY 2002	FY 2004	% Diff	FY 2006	FY 2007	% Diff	FY 2007	FY 2011	% Diff
I-90	\$75	\$110	47%	\$130	\$185	42%	\$190	\$290	53%	\$290	\$365	26%
I-129	\$75	\$110	47%	\$130	\$185	42%	\$190	\$320	68%	\$320	\$325	2%
I-130	\$80	\$110	38%	\$130	\$185	42%	\$190	\$355	87%	\$355	\$420	18%
I-485	\$130	\$220	69%	\$255	\$315	24%	\$325	\$930	186%	\$930	\$985	6%
I-765	\$70	\$100	43%	\$120	\$175	46%	\$180	\$340	89%	\$340	\$380	12%
N-400	\$95	\$225	137%	\$260	\$320	23%	\$330	\$595	80%	\$595	\$595	0%

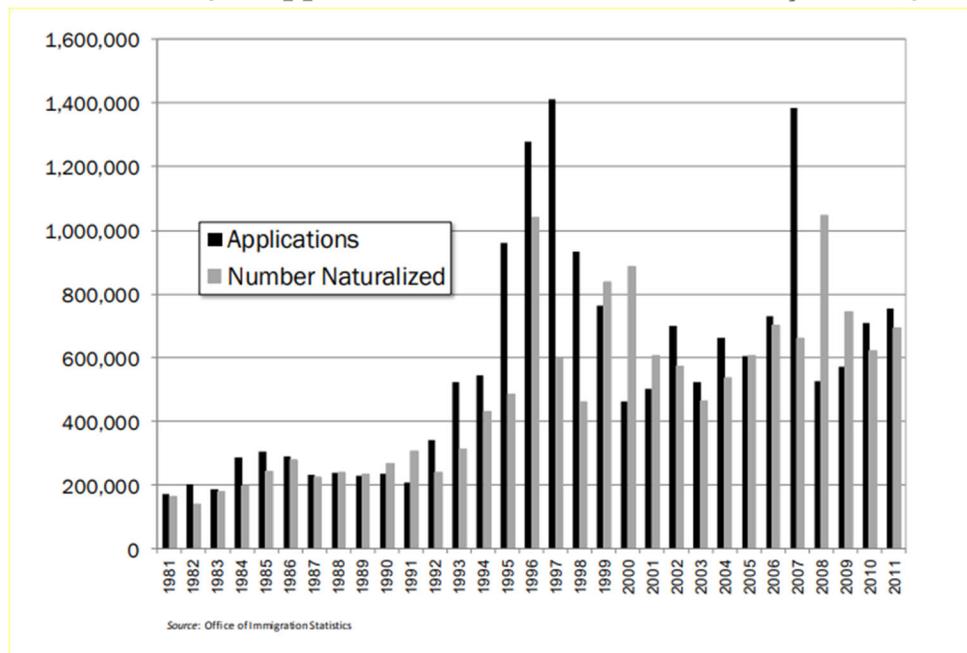
Source: For FY 1994 to FY 2011, Congressional Research Service U.S. Citizenship and Immigration Services' Immigration Fees and Adjudication Costs: Proposed Adjustments, and Historical Context; for FY 2011,

<http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnnextoid=5be73dc5cb93b210VgnVCM10000082ca60aRCRD&vgnnextchannel=5b33aca797e63110V>

Source: Manuel Pastor, Jared Sanchez, Justin Scoggins, and Rhonda Ortiz, *Nurturing Naturalization: Could Lowering the Fee Help?* (Los Angeles: University of Southern California, Center for the Study of Immigrant Integration and the National Partnership for New Americans, February 2013), 6, http://dornsife.usc.edu/assets/sites/731/docs/Nurturing_Naturalization_final_web.pdf.

To support their critiques of the data analysis in the two CRS reports, Pastor et al. conducted a separate analysis over a similar time period using an updated methodology based on the arguments previously described. In expanding the scope of their analysis to include the number of naturalizations from 1981 to 2011, Pastor et al. found that there was a drop in N-400 applications following the fee increase introduced in October 1998 (a fee increase they referred to as the FY1999 increase).⁶⁸

As shown in Figure 7, this drop was preceded by a significant surge in applications in the years running up to 1997. Relatedly, Pastor et al. also observed a significant surge in the number of N-400 applications in 2007 followed by a significant drop in 2008. Similar to the surge leading up to 1997, this surge may be attributed to a rush to apply for naturalization before the implementation of a fee increase in November 2007. To support this hypothesis, Pastor et al. cite a 2008 report by the Migration Policy Institute that looked at USCIS data on monthly filings of N-400 applications. This report found that in FY2007, USCIS received an increasing number of N-400 forms each month with the exception of August, September, and the months following the implementation of the fee increase. The large number of rises and falls in the number of N-400 forms submitted suggests that the eligible-to-naturalize population is impacted by changes in the price of application fees and their incentive to apply for naturalization may be price sensitive. These gaps led Pastor et al. to conclude that any observable difference in the number of individuals who naturalize after the implementation of fee increases will be represented in the “post-surge years,” as demonstrated by the decrease in applications submitted in 1999 and 2008.⁶⁹

Figure 7. Record of N-400 Applications and Naturalizations by Year (1981–2011)

Source: Manuel Pastor, Jared Sanchez, Justin Scoggins, and Rhonda Ortiz, *Nurturing Naturalization: Could Lowering the Fee Help?* (Los Angeles: University of Southern California, Center for the Study of Immigrant Integration and the National Partnership for New Americans, February 2013), 11, http://dornsife.usc.edu/assets/sites/731/docs/Nurturing_Naturalization_final_web.pdf.

One way to estimate the price sensitivity of the eligible-to-naturalize population is by comparing naturalization applications with Permanent Resident Card (Green Card) renewal applications. While not a direct substitute for naturalization, I-90 applications can be viewed as a “comparison shopping” item for individuals who may be eligible to naturalize and are possibly deterred by the price of the N-400 application. Given this substitution, Pastor et al. used the years in which Green Card renewal remained substantially cheaper than the N-400 application as another way to determine the effect of price on naturalization rates. They compared the price differential between the I-90 and N-400 applications between 1994 and 2010, along with the number of years spent in the United States prior to naturalization. This comparison revealed that an increase in the price differential is generally associated with longer delays to naturalization. This correlation suggests that individuals who may be eligible to naturalize may be more willing to pay the cost of the N-400 application fees when there is a smaller differential with the I-90 form fees. Expanding on these findings, Pastor et al. concluded that individuals who may be eligible to naturalize may utilize the I-90 application as an alternative to submitting naturalization applications when there is a significant price differential between the I-90 and N-400 applications. The study’s conclusions imply that some of the eligible-to-naturalize population exhibits price sensitivity toward naturalization costs.⁷⁰

Another novel method to estimate price sensitivity of naturalization is through analysis of the U.S. Census Bureau's American Community Survey (ACS) demographic data. For example, Pastor et al. used demographic data from the ACS, which began to record the year of naturalization for foreign-born citizens in 2008, to further understand the effect historical fee increases had on naturalizations. The ACS data allowed them to determine a more accurate estimate of how fee increases are correlated with changes in the demographics of who naturalizes in a given year. Specifically, Pastor et al. looked at three characteristics of the naturalized population. First, they assessed the naturalized population by looking at the level of education for recently naturalized individuals. In particular, they measured the percentage of the naturalized population in a given year in three categories: "those who had less than a high school degree, those with a bachelor's degree or better, and those who had completed high school or some college." Pastor et al. observed a significant fall in naturalization rates between 1999 and 2004 for the population with less than a high school degree, followed by another significant decline in 2008 after the surge of applications submitted in 2007 were processed. These decreases align with the timing of N-400 fee increases in FY1999 and FY2007 and the general decreasing trend in naturalization associated with the "post-surge" years following major fee increases. These parallels suggest that eligible-to-naturalize individuals with less than a high school degree are affected by price increases. Pastor et al. argue that these changes in rates suggest that eligible-to-naturalize individuals' willingness to pursue naturalization is affected by fee increases because level of education is "highly coordinated with [level of] income."⁷¹ Consequently, the decrease in the share of the population of naturalized citizens with less than a high school degree suggests a decrease in naturalizations for the low-income eligible-to-naturalize population, though specific income data was not available.

Pastor et al. also used ACS data to analyze the correlation between fee increases and the time spent in the country prior to initiating the naturalization application to further demonstrate the correlation between fee increases and naturalization rates. In order to obtain this measurement, they calculated the average length of time between a recorded LPR's arrival in the country and the year of naturalization. The researchers then charted this average length of time against the real price differential between the I-90 and N-400 forms (relying on the idea that these two forms represent "comparison shopping for immigrants"). These calculations, however, were limited by the constraints of the ACS data, which only report when an immigrant arrives in the country and their reported year of naturalization. Consequently, Pastor et al.'s measurements are weakened as the researchers could not account for individual differences in when an immigrant becomes eligible for naturalization. However, despite this limitation in the data, the researchers found a correlated increase in naturalization applications when fees were anticipated to rise in 1999 and

2007. They theorized that this increase in naturalization applications was due to long-term residents seeking to get ahead of a price increase.⁷²

When looking at the long-term trend, Pastor et al. found that as the price differential between the I-90 and N-400 forms increased, there was generally a longer time spent in the country prior to naturalization. They concluded that this increased length of time spent in the country prior to naturalization suggests that eligible individuals did not pursue naturalization in years where the N-400 application fees were significantly more expensive relative to the cost of the I-90 form. The researchers argue that this prolonged wait between when an individual is eligible to naturalize and when an individual pursues naturalization suggests some price sensitivity for the eligible-to-naturalize population.⁷³ While supported with some correlational ACS data, this theory bears testing with experimental or quasi-experimental methods in future research.

The methods outlined in this subsection offer a number of different avenues for estimating the price sensitivity of the eligible population's willingness to naturalize. However, all of the methods are correlational, meaning that the current evidence suggests that naturalization may be price sensitive, but the evidence is not definitive. The CRS reports and Pastor et al.'s study show there is still debate over whether the decision to naturalize is price sensitive. In other words, the literature currently cannot prove that the cost of the naturalization application or other associated expenses affects the eligible-to-naturalize population's actions. Further causal research looking into the price sensitivity of naturalization costs is needed, especially research that disaggregates the findings by subpopulation.

2.1.2. Price Sensitivity of Naturalization and Use of Fee Waivers

An alternative approach to determining price sensitivity of naturalization is to analyze the use of fee waivers and reduced fees for application costs. Recent experimental studies on the effects of the introduction of a standardized fee waiver for the N-400 application in November 2010 support Pastor et al.'s argument that the decision to initiate the naturalization process is price sensitive.

Beginning in 2010, USCIS standardized its federal fee waiver procedures to offer a complete fee waiver for individuals whose household income is less than 150 percent of the poverty line.⁷⁴ Effective as of December 23, 2016, USCIS also offers an application for a reduced fee, USCIS Form I-942, Request for Reduced Fee, for individuals who can clearly demonstrate that their household income is greater than 150 percent of the poverty rate but no more than 200 percent of the poverty rate.⁷⁵ USCIS Form I-942 reduces the fee resulting in a partial fee waiver that lowers the cost of the N-400 application to \$320 for qualifying individuals.⁷⁶ The fee waiver and reduced fee

application help alleviate the cost of the naturalization process for the low-income eligible population and can serve as an incentive to initiate the naturalization application. Prior to the introduction of the standardized fee waiver, individuals could petition USCIS for a fee waiver provided they could sufficiently demonstrate they were unable to pay for the application, but there was no standardized form or standardized evidence requirements. This process resulted in an uneven distribution of waivers due to the lack of standardized policies in determining an applicant's ability to pay. The implementation of the standardized fee waiver program saw a steady rise in the number of applications submitted with fee waivers, with a total of more than 1,000,000 LPRs applying using the standardized fee waiver between 2010 and 2019.⁷⁷ This increase in the use of fee waivers suggests that the eligible-to-naturalize population is price sensitive to the cost of the naturalization application. This conclusion is supported by findings from experimental studies conducted by Stanford University's Immigration Policy Lab (IPL), as well as observational analyses of ACS data.⁷⁸ Together these studies find that eligible LPRs are more likely to naturalize when they have access to reduced application costs through the USCIS reduced fee or other vouchers, a fee waiver, and information on their fee waiver eligibility.

Strong evidence shows that the standard federal fee waiver from USCIS has a positive effect on naturalization applications. For example, in a causal, quasi-experimental study using a difference-in-differences method to compare low-income immigrants' naturalization behavior before and after the standardized federal fee waiver, researchers from IPL found that the introduction of the standardized fee waiver by USCIS increased the overall naturalization rate by about 10 percent in 2013. They were able to say that the fee waiver standardization caused this increase because of their rigorous causal methods. The same study estimated that the changes to the fee waiver program allowed 75,318 LPRs who used the fee waiver program in 2013 to become citizens when they otherwise would not have applied for naturalization. Significantly, this positive effect on naturalization rates was concentrated among immigrant groups who may face some of the steepest barriers to naturalization. The effect is more than two times as large for lower-income groups and for households without an English speaker. Additionally, the effect is four times as large for groups with a high school level of education or less. The IPL researchers theorized that increased assistance from immigration service providers (ISPs) could explain the larger effects of the fee waiver standardization on these particular subgroups. They found that the highest use of fee waivers tended to come from may-be-eligible-to-naturalize LPRs who lived near ISPs. Indeed, they found that LPRs who received ISP assistance were 21.5 percentage points more likely to apply with fee waivers.⁷⁹ Thus, this study suggests that application cost is a significant barrier for groups that are eligible to apply with a fee waiver, and that access to information and assistance in the naturalization process also can be a factor in whether or not immigrants pursue naturalization. This factor is discussed in further detail in Section 2.2.

Similarly, in a separate 2019 randomized controlled trial study of low-income immigrants in New York City conducted by IPL, Michael Hotard et al. found that knowledge of the fee waiver increased naturalization rates. The full study, which also is discussed in further detail in Section 2.2, set out to determine reasons for the gap in the may-be-eligible-to-naturalize population who could reasonably afford naturalization after the introduction of the fee waiver but still did not apply. Overall, the researchers discovered that informing immigrants of their fee waiver eligibility increased naturalization rates in the sample population by 35 percent. This measured effect between naturalization rates and knowledge of the fee waiver suggests that application costs and access to information were both barriers to low-income immigrants who did not choose to pursue naturalization until they were aware of their eligibility for the federal fee waiver. Still, only 33.1 percent of immigrants applied for naturalization with the fee waiver after learning they were eligible for the waiver. This relatively small percentage suggests that many lower-income immigrants face additional barriers to naturalization unrelated to knowledge of the fee waiver or the cost of the application fees. IPL's researchers conducted follow-up qualitative surveys with immigrants who participated in the study to try to determine these additional barriers but found no clear answer. They hypothesized that these additional barriers could be derived from a combination of factors, such as lack of time and legal assistance, as well as difficulty navigating the application system, but further research is needed to determine the reason for this persistent gap in naturalization rates.⁸⁰

One possibility is that there are individuals who may be eligible to naturalize but who are not eligible for the fee waiver who may be similarly deterred by the application cost. For instance, one 2014 descriptive study by researchers for CSII and the Center for American Progress (CAP) looked at observed trends in the ACS data and concluded that individuals who are not eligible for the fee waiver may still be deterred by the application cost.^v This study was published two years before USCIS Form I-942, Request for Reduced Fee, went into effect. However, the study's conclusions also align with the "Additional Information for Filing a Reduced Fee Request" on the USCIS website, in which USCIS "recognize[s] that some applicants cannot afford to pay the full filing fee but can pay a reduced fee."⁸¹ In the 2014 study, CSII and CAP researchers found that of the eligible-to-naturalize population in 2012, 32 percent had incomes that fell below the 150 percent poverty line. While these individuals qualified for the fee waiver and consequently may have been more likely to naturalize, an additional 22 percent lived between 150 percent and 250 percent of the poverty line, and 46 percent lived above the 250 percent poverty line income marker. Comparatively, of the population of those who naturalized in 2011 and 2012, 26 percent fell below

^v The study was published in 2014 and referred to ACS data from 2012, which is prior to when USCIS Form I-942, Request for Reduced Fee, came into effect in December 2016. Therefore, the study references the full federal fee waiver but not the partial fee waiver resulting from the reduced fee application.

the 150 percent poverty line, 21 percent lived between 150 percent and 250 percent of the poverty line, and 53 percent lived above the 250 percent poverty line income marker.⁸²

Naturalization rates also seem to vary by income, suggesting that application costs are influencing behavior. When looking at available ACS data for the population of LPRs who are specifically eligible to naturalize, as compared to the full naturalized population in 2011 and 2012, the CSII and CAP researchers found that there were clear differences in naturalization rates between these income groups: a 6.0 percent naturalization rate for those below 150 percent of the poverty level, a 7.1 percent rate for those in the 150–250 percent band, and a 9.2 percent rate for those whose income is above 250 percent of the poverty level. While the percentage differences in naturalization rates between these different income groups appear small, the researchers estimate that if the rate of the middle-income group (those that live between 150 percent and 250 percent of the poverty line) rose even slightly to be equal to the 9.2 percent rate of the higher income group, “just under 40,000 additional naturalizations” would have occurred. These differing rates suggest that despite the introduction of the standardized federal fee waivers, immigrants in higher income groups naturalize at a more frequent rate than those who qualify for the waivers. The researchers also suggest that if eligible individuals who fall in the 150–250 percent band were offered eligibility for a fee waiver for the naturalization application similar to the one currently offered to those who fall below the 150 percent poverty line, they may experience higher naturalization rates than the LPRs who fall below the 150 percent poverty line, though this hypothesis is unproven.⁸³ The USCIS reduced application cost, which was introduced two years after the publication of this study, targets a similar group of individuals who fall between 150 and 200 percent of the poverty line, which may further support the conclusions of this study; however, further research is needed to confirm this hypothesis. This CSII and CAP study further supports the idea that the cost of the naturalization process relative to an eligible-to-naturalize individual’s income level may serve as a barrier prior to initiating the naturalization application even with the implementation of the fee waiver and reduced costs for the lowest income immigrant groups.

Strong evidence shows that cost also remains a significant barrier for some of the eligible-to-naturalize population who do not qualify for the federal fee waiver. In a related randomized controlled trial experimental study of the immigrant population in New York City, IPL researchers found that offering a voucher for the full cost of the naturalization application doubled the naturalization rate among low-income LPRs with a household income between 150 percent and 300 percent of the federal poverty line. In this 2018 study, Jens Hainmueller et al. conducted two separate experiments involving a randomized distribution of assistance among immigrants who may have been eligible to naturalize. The first experiment looked at a randomized distribution of vouchers that covered the cost of the naturalization application fee through a lottery among

immigrants whose household income was between 150 percent and 300 percent of the poverty line. Although low income, these immigrants did not qualify for the federal fee waiver. Researchers found that distribution of the vouchers to this group increased naturalization rates by about 41 percent. They also observed that the positive effect from the fee voucher was stronger among eligible-to-naturalize immigrants who registered for the New York naturalization program in Spanish. Their rates increased by 51 percent compared to those who registered in English (a 36 percent increase).⁸⁴ The difference in percentage suggests that immigrants face varying barriers to naturalization based on their level of English language proficiency, which is discussed further in Section 2.3.1. This increase also suggests that application fees are a significant barrier to this group despite the fact that they do not qualify for the federal fee waiver.

In the second experiment, researchers randomly distributed five different behavioral nudges with varying levels of information about fee waiver eligibility to eligible-to-naturalize LPRs who fell below the 150 percent poverty line and therefore qualified for the federal fee waiver. These nudges were: a letter from the New York State Office for New Americans reminding them of their potential fee waiver eligibility; a similar letter with a MetroCard for free transport to the nearest immigration Opportunity Center, a “community-based [organization] contracted by the New York State Office for New Americans”; a similar letter and four SMS text reminders; a call to schedule an appointment at an Opportunity Center; and a mixed-outreach strategy that included multiple calls, emails, a letter, and a \$10 MetroCard. These nudges were delivered in English or Spanish based on the language preference of the eligible-to-naturalize LPR. However, the researchers found that these behavioral nudges did not result in statistically significant increases in application rates. This finding suggests that eligible-to-naturalize LPRs who do qualify for the federal fee waiver face additional barriers beyond the cost of the naturalization process. Hainmueller et al. conducted 108 follow-up exploratory interviews with participants from the second experiment in an attempt to determine the reason they did not apply. Many participants stated that they were “too busy” or did not have enough assistance with their naturalization application. Overall, the results of these two experiments support the finding that application costs are a barrier for eligible LPRs who fall between 150 percent and 300 percent of the poverty line and do not currently qualify for the federal fee waiver.⁸⁵ They also demonstrate that the eligible-to-naturalize population with the lowest income levels who do qualify for the federal fee waiver face additional barriers prior to initiating the naturalization application.

Overall, application costs can be a significant deterrent for initiating the naturalization process. As Hotard et al.’s 2019 causal difference-in-differences study demonstrates, eligible-to-naturalize individuals with a household income below the 150 percent federal poverty line are disproportionately impacted by the cost of naturalization and are more likely to pursue citizenship

when provided access to information about their eligibility for the federal fee waiver.⁸⁶ However, the 2018 randomized controlled trial experimental study by Hainmueller et al. shows that even with the introduction of behavioral nudges for low-income groups that do qualify for the federal fee waiver, LPRs from the lowest income groups who may be eligible to naturalize face additional barriers during the naturalization process.⁸⁷ When taken together, the results from these two experimental studies demonstrate that the eligible-to-naturalize population faces barriers related to cost throughout the naturalization process. Additionally, observational historical analyses using ACS data comparing naturalization rates and N-400 fee increases demonstrate a decrease in naturalization applications after major fee increases are implemented.

These observational findings, along with the results from the experimental studies, suggest that a relationship between application costs and initiating the naturalization process does exist, although the exact nature of this relationship remains unknown. As of this writing, no known analysis plots the curve of immigrants' price sensitivity to naturalization fees or reveals specific price points at which immigrants are deterred from pursuing citizenship. This area remains a gap in the literature and may be an area for further research on price sensitivity in the future.

2.2. Information Access Disparities

Access to information about the naturalization process and the benefits of naturalization also can play a role in whether an individual pursues naturalization. One 2013 survey by ISPs in Boston, for example, found that 35 percent of immigrants cited a lack of information on the naturalization application process as a barrier to initiating the application.⁸⁸ Lack of information regarding the naturalization process and how to navigate the immigration system can act as a key deterrent for individuals pursuing citizenship. Conversely, some scholars argue that knowledge of the benefits of citizenship can serve as a motivator for naturalization.

The naturalization rates for refugees compared to non-refugee LPRs in particular reveal the impact of information access disparities. Refugees have higher naturalization rates than non-refugee LPRs. In 2015, only 29 percent of non-refugee LPRs naturalized within six years of receiving their legal residency status compared to 45 percent of eligible-to-naturalize resettled refugees. From this comparison, academic scholars who study refugee naturalization rates concluded, "Refugees naturalize faster and at higher rates than non-refugee immigrants from the same cohorts." The same scholars attributed refugee resettlement rates to three factors: "1) sociodemographic characteristics, 2) impacts of countries of origin, [and] 3) the social context in which refugees are embedded (i.e., employment opportunities, policy environment, density of co-nationals and immigrant support networks in the local community)." While the impacts of sociodemographic

characteristics and countries of origin are not unique to refugees, the impact of social context does suggest an influence of the level of information access. For instance, the researchers found that refugees placed by settlement agencies in geographic areas with immigrant and ethnic enclaves are more likely to encounter better employment opportunities and higher naturalization rates.⁸⁹ They theorize that refugees residing within these communities are able to share and obtain knowledge from community members and organizations, such as faith-based organizations.

The significance of these enclaves is consistent with findings on the impact of immigrant enclaves by researchers from Purdue University, who found that “settlement (integration) resources are not widely available to all categories of immigrants.” Additionally, the Purdue researchers found that immigrants who do not receive government assistance “must rely on their personal skills or turn to resources provided by their neighborhoods or communities.” Immigrants who are more assimilated, have higher English language skills, and have higher levels of education can assist other less-assimilated members of their immigrant communities or families by helping provide access to and understanding of information.⁹⁰

Relatedly, a recent study by IPL researchers using 2016 ACS data on the naturalized population found that LPRs married to a naturalized citizen are more likely to naturalize, while those married to an undocumented person are less likely to pursue citizenship.⁹¹ This finding further supports the idea that the makeup of immigrant communities likely influences an eligible individual’s incentive to naturalize, though other motivations may influence the decisions of individuals married to undocumented persons. While assimilation is not required for naturalization, eligible-to-naturalize individuals who live in communities with well-assimilated immigrant enclaves are more likely to experience higher naturalization rates due to increased access to information on the naturalization process.

Living in an immigrant enclave also increases the likelihood of receiving information and assistance from ISPs, who provide legal and welfare services often at no or low cost to immigrants. Individuals with access to no- or low-cost immigrant legal services are more likely to pursue naturalization due to the assistance provided throughout the process. While the majority of immigrants whose household income falls below 150 percent of the Federal Poverty Guidelines live within 6.6 miles of ISP coverage, about 1.5 million low-income immigrants do not live within twelve miles of an area covered by an ISP.⁹² Thus, a small but significant number of immigrants likely have little to no access to services that can assist with providing necessary and helpful information about the immigration process.

These geographic distributions correlate with research findings from surveys of, and interviews with, eligible LPRs in 2015 conducted by the National Immigration Forum and the New Americans Campaign, which indicate that 61 percent of the LPRs polled had not received any information about the naturalization process.⁹³ As demonstrated by the IPL study on the effect of fee waiver standardization discussed in Section 2.1, access to service providers can be a key determinant in whether immigrants pursue the naturalization process.⁹⁴ In recent years, and especially since the COVID-19 pandemic, ISPs have increased their use of virtual services. However, future research is needed on how this increase in virtual services has affected the eligible-to-naturalize population's access to ISPs.

The lack of access to a service provider is especially noteworthy when viewed in congruence with evidence that increases in information campaigns can have a positive effect on naturalization rates. For example, in a 2019 experimental study in New York City, also discussed in Section 2.1, IPL researchers randomly assigned study registrants who qualified for the N-400 fee waiver to information nudges. Immigrants who participated in the study were separated into two groups. The treatment group, consisting of 75 percent of participants, received an information packet that informed them of their eligibility for the fee waiver and directed them to a resource web page where they could learn more about naturalization, as well as find an ISP who could help them with their application. Comparatively, the control group, consisting of the remaining 25 percent of participants, received information about the resource web page but no information on their eligibility regarding the fee waiver.⁹⁵

Overall, the IPL study found that providing additional information on the N-400 fee waiver to those who qualify increased the rate of naturalization applications by 35 percent. Researchers also found that the fee waiver notice increased the use of the fee waiver in naturalization applications by 10.1 percentage points. The immigrants who participated in the study varied along lines of educational attainment, English language proficiency, and country of origin. In terms of education, 20 percent had not obtained a high school or equivalent degree, 27 percent had obtained a high school or equivalent degree, and 53 percent had attended at least some college classes. In terms of language proficiency, 66 percent completed their registration in English while the remaining 34 percent completed their registration in languages such as Spanish, Russian, Chinese, and Korean.⁹⁶ However, despite this variety, there was no significant evidence that the information nudge was less effective for individuals with lower levels of income or education, suggesting that information campaigns have a positive effect on all immigrant populations.

The effects of this information campaign suggest that lack of information can be a significant barrier for immigrants, even among eligible-to-naturalize LPRs who register for a naturalization

study. Consequently, ensuring access to information on available programs that assist immigrants throughout the naturalization process could assist in alleviating barriers to naturalization. It is important to note, however, that there were some eligible LPRs participating in the IPL experiment who did not pursue naturalization after receiving the information prompts. As discussed in Section 2.1, the fact that a majority of the applicants were informed of their fee waiver status but still did not pursue a naturalization application suggests that immigrants face additional barriers beyond information access.⁹⁷ Further research modeled after this experimental design would be extremely useful in determining these barriers.

Finally, greater access to ISPs and information campaigns could provide further information on how citizenship can benefit immigrants who may be uncertain about initiating the naturalization process. These information campaigns are distinct from the information campaigns provided in the IPL study due to their focus on providing education on broader aspects of the naturalization process. Specifically, this education can include information on concrete benefits of citizenship, such as psychological benefits associated with a secure legal status, possible higher wages, access to federal benefits, and civic opportunities. Additionally, education on how U.S. citizenship can fit into an immigrant's preexisting identity has been shown to remove personal barriers to citizenship for some immigrants. For example, one 2010 ethnographic study observed the citizenship narrative used to educate Laotian refugees that connected traditional themes of citizenship, including "unity, nationalism, assimilation, and upward mobility," with the refugees' articulation of the complex ideology of citizenship.⁹⁸ Findings from this small study suggest that such tailored education on the benefits of citizenship for each immigrant group may motivate refugees to naturalize. Improving access through these education campaigns, as well as increasing awareness of fee waiver eligibility, may alleviate barriers for eligible LPRs, though more research is needed to see if the results generalize to other populations.

2.3. Social Factors

In addition to the barriers described in the previous two subsections, various social factors related to immigration demographics affect eligible-to-naturalize individuals' decision to pursue naturalization. Such social factors include English language proficiency, educational attainment, country of origin, and family dynamics and other demographic factors. To provide clarity in this report, each of these topics is listed separately, but because they are interconnected, there is some overlap between the sections.

2.3.1. English Language Proficiency

Limited English language proficiency presents in the research literature as a major barrier in the pre-application phase of the naturalization process. An analysis of ACS data on the naturalized population from 2012 to 2016, for example, demonstrates that “individuals who speak English well or very well have about 130 to 150 percent higher odds of naturalizing than those who report not speaking English at all.”⁹⁹ These higher rates are partially due to the correlation between English language levels and higher incomes, educational levels, and overall time spent in the United States.

Donald Kerwin, Robert Warren, and Charles Walker, researchers from the Center for Migration Studies of New York and the Catholic Legal Immigration Network, also reviewed ACS data from 2010 to 2019 for immigrants arriving between 1991 and 2001 and found that naturalization rates are higher for immigrants fluent in English, as well as immigrants who have higher levels of educational attainment. In particular, they found that individuals are three to four times more likely to naturalize if they are fluent in English and attended college. Their analysis showed that 48 percent of individuals fluent in English had naturalized by 2019, compared to only 11 percent of those with less fluency. The naturalization rates were exactly the same for those with more than a high school education (48 percent) compared to those with less than a high school education (11 percent).¹⁰⁰

Additionally, some evidence suggests that immigrants with lower English language proficiency may be less likely to initiate the naturalization application due to fear of the English language test. Research suggests that many individuals seeking to naturalize are aware of the English language requirement and those who do not feel comfortable with their English skills may not apply, even if they would otherwise want to naturalize. A 2012 Pew Research Center survey of Hispanic migrants found that 26 percent identified personal barriers, including a lack of English proficiency, as one of the main reasons for not naturalizing. Within the 26 percent who cited personal barriers, 65 percent of migrants claimed that they needed to learn English and that the citizenship test was too difficult. Relatedly, those surveyed who reported speaking English moderately or very well also reported higher motivations for seeking naturalization.¹⁰¹ To put these numbers in perspective, 43 million U.S. adults possess low literacy skills, according to a National Center for Education Statistics (NCES) analysis of data from the Program for the International Assessment of Adult Competencies. This number includes 8.2 million adults who could not fully participate in the study due to a language barrier or a physical or cognitive disability. The NCES study also found that foreign-born adults were overrepresented in the low literacy population, comprising 34 percent.¹⁰²

However, the extent to which English language proficiency acts as a barrier to naturalization varies among immigrant groups. Descriptive analysis from CSII researchers that looked at the eligible-to-naturalize population in California found that level of English language proficiency is not a uniform barrier to naturalization across all immigrant populations. Using data from the ACS, they estimate that individuals who speak Spanish at home have some of the lowest naturalization rates in contrast to individuals with similar English language skills who speak Vietnamese, Chinese, and Korean at home and have the highest rates of naturalization in the state. The researchers suggest that this divergence among immigrant groups is likely due to the influence of other factors that impact Spanish-speaking immigrants. For example, immigrants from Mexico also have a lower average income compared to other immigrant groups, which may be one contributing factor for low naturalization rates for Spanish-speaking immigrants. Yet further research needs to be done to identify more specific reasons for the high naturalization rates among Vietnamese, Chinese, and Korean speakers.¹⁰³

The variations in the impact of English language proficiency among different immigrant groups also suggest that there are other factors that influence naturalization, such as country of origin. However, even within these levels of variation, English language proficiency remains a barrier for each population group. Indeed, for groups from Asian countries including Vietnam, China, and Korea, English proficiency is one of the only demographic factors that can determine likelihood of naturalization.¹⁰⁴ Still, despite the reported hesitancy to naturalize from immigrants with lower English language proficiency, the English and civics components of the naturalization test have a 93 percent pass rate.¹⁰⁵ This high pass rate likely suggests that those with lower English language skills do not initiate the naturalization process, but more research is needed to confirm this assumption.

2.3.2. Educational Attainment

Level of education also is one of the most frequently cited factors correlated with rates of naturalization. Immigrants with a high school degree or no diploma are less likely to naturalize than individuals with some college education or an advanced degree. A review of historical naturalization trends reveals that individuals with at least some college education or a bachelor's degree have about a 30–35 percent higher chance of naturalizing than those with a high school level of educational attainment or less.¹⁰⁶ However, a large percentage of the current eligible-to-naturalize population has less than a high school diploma. More specifically, according to the most recently available data on the eligible-to-naturalize population from the 2019 ACS, 18.5 percent of eligible adults have a bachelor's degree or higher, 14.5 percent have at least some form of college education, and 40 percent have less than a high school diploma level of educational

attainment.¹⁰⁷ These percentages mean that only about 33 percent of eligible-to-naturalize adults currently have the educational attainment level shown in naturalization trends to be more likely to naturalize.

While the ACS data cannot provide causal evidence as to whether possessing less than a high school degree affects the decision to naturalize, this observed correlation is supported by studies that found adults with less than a high school education also are least likely to be able to afford the naturalization fee.¹⁰⁸ As referenced in Section 2.1, these findings demonstrate that levels of educational attainment are often positively associated with levels of income among the eligible-to-naturalize population.¹⁰⁹ Consequently, the education disparity is a representation of the intersectionality of many barriers prior to initiating the naturalization application.

Similarly, some academics argue that while the population considered the least likely to naturalize includes individuals who do not possess a high school diploma, these individuals also share many other characteristics that are correlated with lower naturalization rates. These demographic characteristics include having a lower income, being Latino, being older, and having lower English language proficiency.¹¹⁰ For example, a nationwide 2012 survey of Latino LPRs conducted by the Pew Research Center found that Latino LPRs with lower levels of educational attainment were more likely to cite language and personal barriers as their reasons for not initiating the naturalization process than other Latino LPRs surveyed. Pew concludes that due to the wide availability of data on education levels, researchers and analysts can use level of educational attainment as a proxy to identify groups of eligible LPRs that may be the least likely to initiate the naturalization process.¹¹¹ This conclusion, however, is still up for debate.

2.3.3. Country of Origin

There are three ways immigrants' country of origin can affect their likelihood to pursue naturalization: feelings of connection to their homeland, the role of dual citizenship, and the country of origin's political environment. This section considers all three possibilities.

First, some scholars argue that immigrants who feel a strong connection to their country of origin and who continue to view their origin country as their homeland may be inclined not to pursue naturalization due to issues related to personal identity. This argument falls logically within the consensus among academics that modern "immigrants are simultaneously embedded and integrated in the political, social, and economic life" of both the United States and their home countries.¹¹² However, in their 2014 study of Latino immigrants who hold transnational ties to their home countries, academic researchers Sarah Allen Gershon and Adrian D. Pantoja argue that such

ties actually can facilitate an initiation to naturalization. They conclude that by maintaining transnational ties to their homeland, individuals are more likely to develop and strengthen civic and cognitive skills, such as navigating a bureaucratic process. These skills allow immigrants who maintain transnational ties to participate civically and naturalize at higher rates. Consequently, although there is not enough evidence to prove a direct causal relationship between transnational ties and immigrants' incentive to initiate the naturalization process, Gershon and Pantoja's study demonstrates that feelings of connection to one's homeland should not necessarily be seen as a confirmed barrier to the naturalization process for the eligible-to-naturalize population.¹¹³ Still, more research in this area is needed.

Second, laws restricting dual citizenship in an immigrant's country of origin can serve as an incentive not to naturalize for some. One difference-in-differences quasi-experimental study looking at the effect of 1990s dual citizenship laws in Latin American countries on naturalization rates revealed that immigrants recently granted dual citizenship are more likely to naturalize. The researcher's analysis of U.S. Census Bureau immigration data from countries that began to offer dual citizenship in the 1990s (such as Colombia, Ecuador, Costa Rica, the Dominican Republic, and Brazil) found that naturalization rates for immigrants from these countries rose 4.5 percentage points relative to immigrants from other Latin American countries. The same study estimated that between 1990 and 2000, the overall naturalization rate for immigrants from all Latin American countries that granted dual citizenship increased by 18 percent. The study also found immigrants originating from countries offering dual citizenship have higher employment rates and earnings and are less likely to participate in welfare programs.¹¹⁴ This finding is important because employment and income level also are positively correlated with higher naturalization rates. However, while the study provides evidence of a positive correlation between dual citizenship and rates of naturalization, it may not sufficiently disentangle the selection bias issue between the income and education levels of those who apply for dual citizenship and their motivations for applying.

Other studies have found less conclusive results on the benefits of dual citizenship. A 2016 paper by IPL researchers Moritz Marbach, Jens Hainmueller, and Dominik Hangartner, for example, found that dual citizenship recognition had a much more limited effect than the conclusion reached by the previous study on Latin American immigrants to the United States. The IPL researchers suggest that the prior study and others with similar conclusions fail to account for the confounding effect of general naturalization trends, such as the fact that naturalization rates tend to increase over time independent of citizenship reform.¹¹⁵

Utilizing a causal regression discontinuity design to examine short-term naturalization rates in the United States and Switzerland before and after dual citizenship reform and allowing for individuals to naturalize and retain their origin country citizenship, Marbach, Hainmueller, and Hangartner's results indicate that dual citizenship overall has a null effect on naturalization rates. For immigrants from some countries of origin to some host countries, such as Ecuadorian immigrants to the United States, the effect of dual citizenship reform is positive (i.e., increased naturalization rates). For others, such as Mexican immigrants to the United States, the effect is negative (i.e., decreased naturalization rates). However, the majority of dual citizenship reforms resulted in a null effect on naturalization rates. On the whole, dual citizenship reform has an effect which is not statistically significant, meaning the analysis cannot prove dual citizenship reform has an effect on naturalization rates. As such, the IPL researchers conclude that dual citizenship reform alone is likely not an effective tool to incentivize naturalization and other reforms, such as lowering the cost of application, are more effective.¹¹⁶

Third, immigrants' decision to naturalize can be both helped and hindered by the political and economic environment of their country of origin. For instance, one study—a descriptive analysis of naturalization data from 2012 to 2016—found that immigrants from socialist or refugee-sending countries are more likely to naturalize. If an LPR is from a country that is “traditionally refugee-sending,”^{vi} their likelihood of naturalization increases by 42.5 percent. However, if immigrants are from a country designated with Temporary Protected Status (TPS),^{vii} there is a 26.7 percent lower probability of them pursuing naturalization compared to immigrants not from TPS countries. This difference may be attributed to the fact that many immigrants from TPS countries tend to possess other characteristics associated with lower naturalization rates. Additionally, immigrants from countries with more democratic systems or higher gross national products are less likely to naturalize in the United States. Geographic distance also can be an influencing factor as individuals who immigrated from more distant countries are more likely to naturalize.¹¹⁷

In another analysis using data on LPRs from 2019, CRS found that immigrants from Brazil, Honduras, Guatemala, El Salvador, and Mexico had among the lowest naturalization rates (35 percent), indicating a possible correlation between naturalization rates and geographic proximity.

^{vi} The phrase “traditionally refugee-sending” is used by one study to describe countries that send refugees when specifically looking at the relationship between naturalization rates and immigrants' countries of origin (Thai V. Le, Manuel Pastor, Justin Scoggins, Dalia Gonzalez, and Blanca Ramirez, *Paths to Citizenship: Using Data to Understand and Promote Naturalization* (Los Angeles: University of Southern California, Center for the Study of Immigrant Integration, January 2019), https://dornsife.usc.edu/assets/sites/731/docs/PathsToCitizenship_Full_Report_CSII.pdf.

^{vii} TPS is a special status designated by the Secretary of Homeland Security “due to conditions in the country that temporarily prevent the country's nationals from returning safely, or in certain circumstances, where the country is unable to handle the return of its nationals adequately” (“Temporary Protected Status,” USCIS, DHS, last updated October 10, 2023, <https://www.uscis.gov/humanitarian/temporary-protected-status>).

However, as this literature review previously mentioned, eligible LPRs from these countries also face many other barriers, such as cost barriers, barriers related to low English proficiency, and barriers related to accessing information, which makes it hard to disentangle the causal factors for lower naturalization rates. Comparatively, that same year, immigrants from the Philippines, Vietnam, Iran, and Poland had some of the highest naturalization rates (exceeding 70 percent), which also may indicate a correlation between naturalization rates and geographic proximity. These countries also have less democratic or more oppressive political systems, or “geopolitical factors and calamities that initiate flows of refugees and asylees,” which may further influence naturalization rates.¹¹⁸

Finally, several sources in the literature note that immigrants from Mexico are less likely to naturalize than immigrants from any other country. Low naturalization rates for immigrants from Mexico and other Latin American countries appear across the literature referenced in this report. These low rates can be partially explained by the fact that when looking at country of origin, Mexican immigrants comprise both the largest proportion and the poorest group of LPRs.¹¹⁹ Additionally, a 2016 study using U.S. Census Bureau data and other publicly available state data found that the share of naturalizations was lower in locations where Mexican immigrants lived in clusters together.¹²⁰

While these findings seemingly contradict research on the effect of immigrant enclaves, the researchers of this study suggest that the lower rates of naturalization for Mexican immigrants may be attributed to the fact that they are highly represented in the undocumented immigrant population. Undocumented immigrants are not eligible to naturalize and, therefore, can lower the share of naturalizations in a given area.¹²¹ However, even with the disproportionate representation in the undocumented population, Mexican immigrants’ naturalization rates (36 percent in 2013 and 34 percent in 2019) are consistently low in comparison to the rates of immigrants from other countries of origin, suggesting that something unique about the country of origin may act as a barrier in the pre-application process.¹²²

2.3.4. Family Dynamics and Other Demographic Factors

The influence of family dynamics on the decision to initiate naturalization is difficult to quantify, but there is evidence that the immigration status of family members, marriage status, gender, and parental status can serve as barriers in certain contexts. As discussed in Section 2.2, living in close proximity to immigrants who are naturalized, are more assimilated, or have higher educational attainment can increase an eligible individual’s likelihood of initiating the naturalization process.¹²³ Individuals who live with a naturalized parent, spouse, or other family member are more likely to

become citizens.¹²⁴ Comparatively, having an undocumented family member in the household can lead to 50 percent lower odds of naturalizing compared to living with no undocumented family members. Researchers theorize that this barrier prior to initiating the naturalization application likely stems from concerns about potentially putting an undocumented family member at risk by interacting with the government and immigration service agencies, though evidence to support this theory is merely anecdotal.¹²⁵

Additionally, some naturalized adults explain that providing opportunities for their children was one of their main reasons for pursuing citizenship.¹²⁶ However, if children can obtain citizenship status through other means, parents may be less incentivized to pursue naturalization. An example of this dynamic occurred in Germany after the government changed its citizenship laws in 2000 to allow the children of immigrants living in Germany to naturalize more easily regardless of their parents' naturalization status. Following this change, Germany saw a slight decrease in the number of naturalizations, likely due to a decreased incentive for parents who were previously motivated to pursue citizenship for their children's benefit.¹²⁷

Family dynamics such as the immigration status of one's children or spouse also can have some influence on whether or not an individual initiates the naturalization process. One 2018 study published in the prestigious journal *Proceedings of the National Academy of Sciences of the United States of America* used a fixed effects regression model with 2000–10 administrative data from the DHS Office of Immigration Statistics to determine reasons for U.S. refugee naturalization. The authors (Mossaad et al.) found that of refugees' motivations to naturalize, spousal and parental characteristics seemingly only affected refugee naturalization rates by 3 percent.¹²⁸

A more recent study, however, found that eligible individuals with a naturalized spouse are significantly more likely to naturalize compared to eligible individuals with an undocumented spouse. This study also employed a fixed effects regression model, using ACS data from 2012 to 2016 to analyze the total recently naturalized population, including refugees and non-refugees.¹²⁹ The same study further demonstrated that women are more likely to naturalize than men. This finding is supported by Mossaad et al.'s study on refugee motivations to naturalize, which found women naturalize at a rate 12 percent faster than men.¹³⁰ Additionally, consistent with findings on naturalization barriers for the general LPR population, surveys of unmarried Latino LPRs without children reveal financial and administrative barriers to be reasons for why they have not naturalized.¹³¹ The barriers associated with these family dynamics are likely related to the intersectionality of factors deterring initiation of the naturalization process. Indeed, many correlations between naturalization initiation rates and marital status could be attributed to other barriers, such as English language proficiency and access to information.

Finally, age also can be a barrier in the pre-application phase of the naturalization process, especially when combined with other factors. For example, one correlational study focusing on Dutch migrants in the Netherlands conducted a regression analysis on a longitudinal Dutch immigrant database that included data from 1995 to 2011.^{viii} The researchers found that “migrants who immigrate at an older age are less likely to naturalize (a decrease of about 2 percent per year of age).”¹³² While the generalizability of this context to domestic U.S. naturalization is unclear, research in the U.S. context specifically suggests that the conclusions may hold. For instance, in the United States, the largest percentage of naturalizations consists of adults between the ages of twenty-five and forty-four. Comparatively, adults over the age of fifty-five and between the ages of eighteen and twenty-four comprise much smaller percentages of the naturalized population.¹³³ These differences may be partially attributed to the fact that adults aged forty-four years and younger comprise the largest share of the eligible-to-naturalize population.¹³⁴

However, the probability of naturalization decreases significantly for individuals aged sixty-five and older. One reason for this age gap in naturalization rates could be that eligible-to-naturalize adults aged sixty-five and older face additional barriers to initiating the naturalization process given that they are more likely to have lower levels of English language proficiency and lower levels of educational attainment, based on a study of ACS data. Researchers also suggest that older immigrants may be less incentivized to naturalize compared to younger immigrants because they have less time to “reap the benefits of citizenship.” Consequently, these researchers suggest that reaching the eligible-to-naturalize population earlier in their lives may increase rates of naturalization.¹³⁵

Similarly, many studies have observed that naturalization rates are lower for eligible-to-naturalize individuals who have spent more than twenty years residing in the United States. An FY2019 study by CRS, for example, found that naturalized individuals spent an average of eight years in LPR status before naturalization. A later study by the DHS Office of Immigration Statistics revealed that in 2021, individuals spent a median of seven years in LPR status before obtaining citizenship.¹³⁶ Researchers analyzing ACS data also demonstrate that of the population of eligible LPRs living in the United States, the largest share consists of LPRs who have been eligible to naturalize for over twenty years, followed by the group of LPRs that has been eligible to naturalize for one to five years. The group that has the lowest percentage of eligible-to-naturalize LPRs comprises those who have been eligible for six to ten years, which, along with the CRS and DHS findings, suggests that this group has the most naturalizations. This last study concluded that extended time as an eligible-to-naturalize LPR who has not naturalized is correlated with a lower likelihood of naturalization.¹³⁷

^{viii} FRD uses the term “migrant” here because it is the term used by researchers in the cited study.

Overall, the observations from each of these administrative studies suggest that older age and increased time in the United States in eligible LPR status are correlated with lower naturalization trends. While this correlation does not provide enough evidence to draw a direct causation between age and the likelihood to naturalize, it does indicate that age could be a factor in the pre-application phase of the naturalization process.

In total, a variety of social factors are correlated with the decision to initiate naturalization before submitting the naturalization application. The eligible-to-naturalize population faces a unique intersection of barriers, such as English language proficiency, educational attainment, country of origin, and social dynamics, that affects one's likelihood to pursue citizenship. Due to this intersectionality, these factors may impact some eligible-to-naturalize groups more than others, such as Spanish speakers with limited English language proficiency. As this intersectionality can make it difficult to determine the effect of individual barriers, further research analyzing the demographic characteristics of naturalized groups is needed.

3. BARRIERS TO NATURALIZATION AFTER INITIATION OF THE APPLICATION

The literature on naturalization notes several barriers that applicants can face after they begin the naturalization application. In the early stages of applying, some applicants state that they find the naturalization application and adjudication process, including the N-400 text itself, confusing and complex. Once they submit their application to USCIS, a recent study found a correlation between applicants' race/ethnicity, gender, and religion and lower rates of application approval. However, as this study is correlational and not causal, more research is needed to understand the root causes of these differences.¹³⁸ Further, backlog issues and processing time delays can present an obstacle by increasing the time applicants spend waiting during the adjudication process, which may cause some to forgo their application in favor of other routes, such as reapplying for their Green Card. Lastly, recent policy decisions that resulted in additional review criteria and reduced transparency may have created barriers by inducing applicants to spend increased time on their applications or abandon the naturalization application altogether.¹³⁹ Despite these obstacles, it is important to note that the approval rate for applications remains high. Since 2009, around 86–87 percent of applications have been approved each year.¹⁴⁰ This suggests that pre-initiation barriers likely represent a far larger impediment to the naturalization process than post-initiation barriers.

This section proceeds as follows: First, it reviews how the complexity of the naturalization application acts as a barrier to naturalization. Second, it considers how demographic factors correlate to naturalization approval rates. Third, it examines the impact of backlog and processing delays. And fourth, it reviews literature stating that recent policy decisions represent a shift toward enforcement over adjudication and reduce transparency, which act as another barrier.

3.1. Complexity of Naturalization Application and Adjudication Process

The first barrier applicants generally face after deciding to apply for naturalization is trying to understand what they perceive as a confusing, lengthy, and difficult application and adjudication process, as stated in interview findings by applicants or their representatives. For example, New America, a "think and action tank" in Washington, DC, that conducts research and advocates for evidence-based reforms, interviewed sixty-three immigrants and naturalized citizens and released its findings in a 2019 report. Half of the interviewees claimed the naturalization process post-application is "long, outdated, complex, not transparent, or difficult."¹⁴¹ Similarly, interview findings from a 2020 study of over 200 service providers in twenty-four metro areas by the Migration Policy Institute, a nonpartisan think tank, suggest applicants are intimidated by the lengthy application and adjudication process.¹⁴²

Other surveys also support or supplement this finding. For instance, a 2016 report published by the National Immigration Forum, an immigrant advocacy nonprofit group, citing a survey of 128 LPRs noted that 61 percent said they had not received information about how to become a citizen.¹⁴³ These qualitative findings suggest that even beginning the naturalization process is confusing or daunting for many applicants. These feelings could delay or dissuade applicants from beginning the process. The interviews, however, did not determine how many people did not apply or suspended an application due to these concerns.

For the naturalization application text itself, found in the N-400, additional survey and interview data from a 2017 report published by the National Partnership for New Americans, a coalition of sixty immigrant and refugee rights organization in the United States, reaffirm that many find the application text and requirements long and complex.¹⁴⁴ The N-400 application itself is twenty pages long with more than fifty questions; these questions also require gathering additional information and supporting documentation.¹⁴⁵ Since researchers do not have data on precisely how long potential applicants spend preparing to apply, it is unknown how long the entire process takes, from deciding to apply through gathering needed materials, learning what needs to be done, and actually submitting an application. However, the researchers from New America found that around half of the applicants surveyed considered finding the time to complete the large application and gather the necessary documentation to be a barrier to naturalization.¹⁴⁶ Further, in a 2013 survey of ISPs in Boston, 35 percent of respondents shared that they considered lack of awareness about the naturalization process to be a barrier.¹⁴⁷

The New America study also found that interview respondents considered some language in the N-400 to be complex and confusing. Respondents shared that they feared making simple mistakes due to misunderstanding the application requirements and would regularly have another person review their application to ensure there was no misinterpretation.¹⁴⁸ The National Foundation for American Policy, a nonpartisan think tank focused on immigration, international trade, and other issues related to globalization and the economy, similarly argues that the language of the N-400 form is complex and contains terminology average English speakers may not understand. Their recommendations for clarifying the language of the N-400 text are to:

- Specify that each applicant in a family unit must file a separate application;
- Clarify the timeframe of eligibility for an applicant to file the N-400;
- Provide a link to the M-476 manual, “A Guide to Naturalization”;
- Explain the legal terminology used in USCIS Form N-400;

- Clarify reporting requirements regarding name, mailing address, and time spent outside the United States;
- Cross-reference between page numbers of the N-400 form and sections of the N-400 instructions;
- Reference waivers an applicant may apply for; and
- Clarify complex, unfamiliar, or obscure terminology used in the N-400, such as “title of nobility”; “affiliation”; “indirectly”; “nonresident”; “habitual drunkard”; and “bear arms.”¹⁴⁹

These recommendations align with the applicants’ previously mentioned concerns regarding the application’s focus on complex language, legal concerns, and reporting requirements.

The literature also suggests that a significant number of immigrants likely have little to no access to services that can assist with providing information about the naturalization application process, and that large percentages of the eligible population have not received information about how to naturalize.^{ix} Such assistance might resolve some of the stated confusion and concern regarding the application process and N-400 text. The New America researchers, for instance, state that citizenship assistance generally requires a potential applicant to actively seek help. After obtaining permanent residence, communication around immigration and naturalization is limited, and many individuals only consider naturalization around major milestones, such as the five-year residency requirement mark or around the expiration of a person’s Green Card.¹⁵⁰ Without assistance, some potential applicants may be dissuaded from applying over concerns that the naturalization process is too long and complex.

3.2. Social Factors Influencing Naturalization Rates

Study findings further suggest that an applicant’s race/ethnicity, gender, or religion may affect their probability of naturalization approval. In particular, researchers from the University of Southern California’s Gould School of Law and the University of Washington’s School of Public Policy found significant differences in naturalization approval rates based on the above factors when reviewing USCIS data from 2014 to 2018. The total sample included more than 2,687,101 nonmilitary applications for naturalization (N-400s), of which USCIS approved about 92 percent. The researchers found that non-White applicants and Hispanic applicants were less likely to be approved for naturalization than non-Hispanic, White applicants. Also, male applicants were less likely to be approved than female applicants, and applicants from Muslim-majority countries were

^{ix} For more information, see Section 2.2.

less likely to be approved than applicants from non-Muslim-majority countries. Their findings suggest that an applicant's race/ethnicity, gender, and religion may affect their probability of naturalization approval.¹⁵¹ However, the reason for these disparities is unknown, and the correlational findings from this study only indicate that a disparity existed between 2014 and 2018.

More specifically, the researchers' regression model found that, all else being equal, Black applicants were 41 percent less likely than White applicants to have their applications approved. Black applicants comprised approximately 13.1 percent of the sample yet accounted for 15.6 percent of all denials. Female applicants' odds of approval were about 18 percent larger compared to male applicants. Female applicants comprised approximately 55.9 percent of the sample but accounted for only 53 percent of denials. And applicants from Muslim-majority countries were 43 percent less likely to have their applications approved than applicants from non-Muslim-majority countries. Applicants from Muslim-majority countries comprised 11.7 percent of the sample but accounted for 15.2 percent of denials. All of these results were statistically significant.¹⁵²

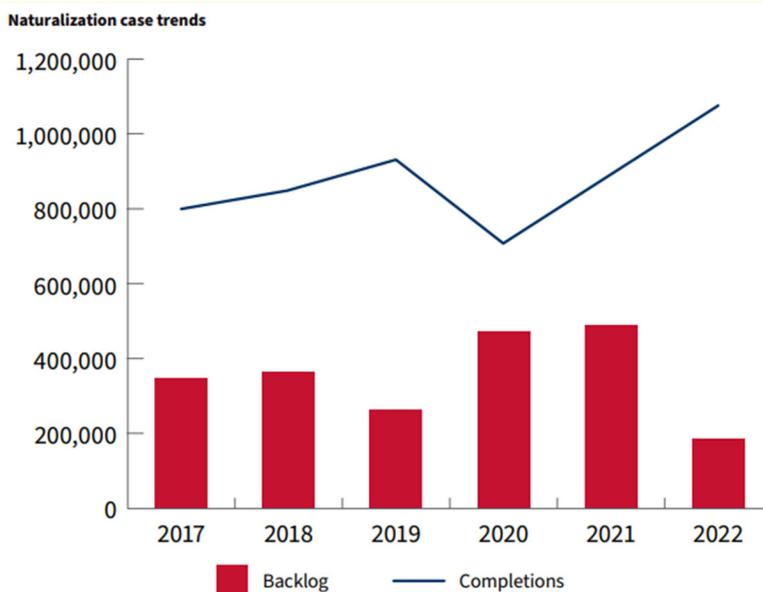
The researchers also found that these factors can interact, resulting in further discrepancies and creating a ranking of naturalization rates based on race/ethnicity, gender, and religion. For example, the estimated probability of the approval rate for Black males is 89 percent compared to the estimated probability of approval for White females (94 percent), and Black applicants from Muslim-majority countries are an estimated 9 percent less likely to be approved than White individuals from other countries.¹⁵³ Still, additional research is needed to test these findings in years both before and after the years of this study.

3.3. Backlog and Increased Processing Times as a Barrier

A commonly cited barrier to initiating the naturalization application is the USCIS backlog^x for N-400 adjudication, specifically that the backlog exacerbates the processing times for applicants and forces applicants to wait long periods of time to learn of adjudication decisions. The New America interview evidence suggests that knowledge of the backlog may keep potential applicants from initiating the naturalization process, but more rigorous research is needed to confirm this theory.¹⁵⁴ The backlog for N-400 applications had been increasing in recent years as can be seen in Figure 8. In 2022, however, the backlog for N-400 applications dropped to under 200,000, marking a change in the increasing backlog trend since 2017.¹⁵⁵ This means that in 2022, there were around 200,000 cases which took longer than six months to adjudicate.

^x "Backlog" is defined as the number of cases still pending outside the target cycle time period. According to USCIS, the target cycle time period for N-400 applications is six months ("Reducing Processing Backlogs," accessed March 28, 2023, <https://egov.uscis.gov/processing-times/reducing-processing-backlogs>).

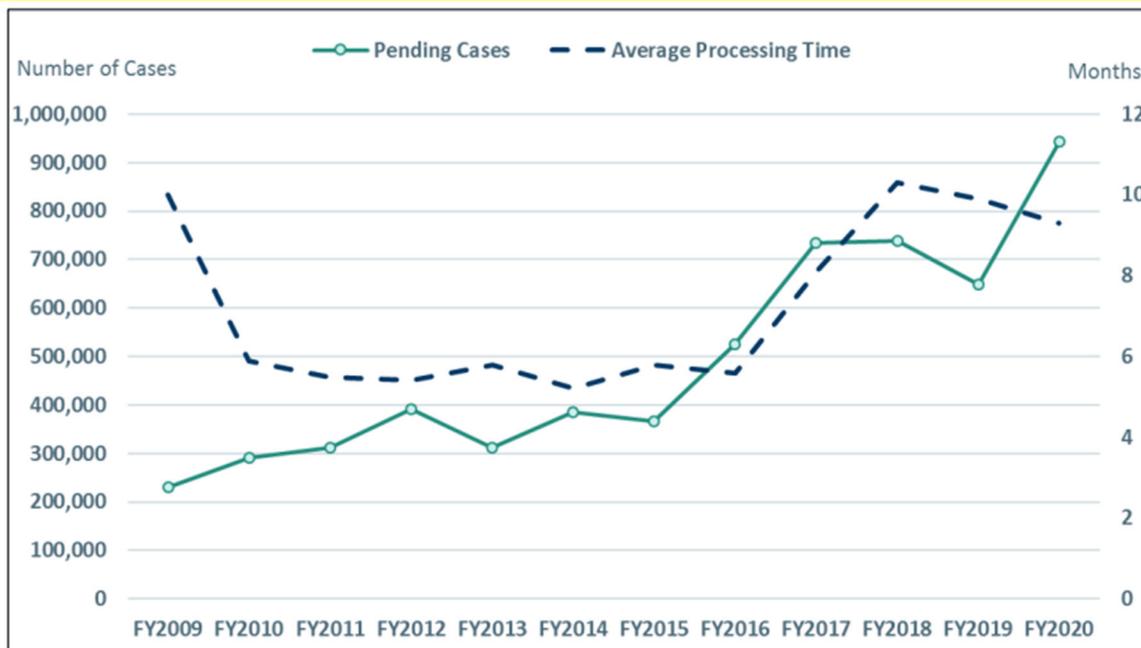
Figure 8. N-400 Backlog (FY2017–22)



Above: In FY 2022, USCIS completed 1,075,700 naturalization applications (Form N-400) and administered the Oath of Allegiance for 967,400 new U.S. citizens. Including derivatives (Forms N-400, N-600, N-600k, N-336, and I-551), USCIS completed 1,122,300 naturalization cases and naturalized 1,023,200 new U.S. citizens.

Source: DHS, USCIS, *Fiscal Year 2022 Progress Report* (Washington, DC: DHS, USCIS, December 2022), 3, https://www.uscis.gov/sites/default/files/document/reports/OPA_ProgressReport.pdf.

When using a different definition, pending cases or the number of N-400 applications in the docket regardless of how long they have been processing, the number of individuals awaiting adjudication is higher and reflects a constantly increasing trend since at least FY2009, as can be seen in Figure 9. The growth of pending applications, 291,833 in FY2010 compared to 942,669 in FY2020, is accompanied by increases in processing times, from 5.9 months in FY2010 to 10.5 months in FY2022.¹⁵⁶ This change implies that as the number of pending applications grows, applicants must wait longer to hear back on their applications.

Figure 9. Pending N-400 Applications and Processing Times (FY2009–20)

Sources: Pending cases (FY2009-FY2012): Data provided to CRS by USCIS. (FY2013-FY2020): USCIS, "All USCIS Application and Petition Form Types," multiple years, at <https://www.uscis.gov/tools/reports-and-studies/immigration-and-citizenship-data>. Average processing times (FY2009-FY2014): Data provided to CRS by USCIS. (FY2015-2020): USCIS, "Historic Processing Times," at <https://egov.uscis.gov/processing-times/historic-pt>; and data provided by USCIS.

Source: Holly Straut-Eppsteiner, *U.S. Naturalization Policy*, CRS Report for Congress R43366 (Washington, DC: Library of Congress, CRS, updated May 3, 2021), 17, <https://crsreports.congress.gov/product/pdf/R/R43366>.

Longer processing times can act as a barrier to naturalization because long wait periods may deter immigrants from naturalizing, especially for those whose Green Card would expire before their N-400 application is processed or who are naturalizing in order to vote in an upcoming election.¹⁵⁷ However, research did not uncover any quantitative data on how many individuals drop out of or never initiate the naturalization application due to delays caused by the backlog. It is an assumption supported anecdotally within the literature but requires further research to confirm conclusively. For example, the researchers from New America state "[a] couple of interviewees described having planned to apply for citizenship when their Green Card expired, but ultimately opted to renew upon learning that citizenship approval may take longer than the time they had left on their Green Card."¹⁵⁸ In any case, this concern is likely mitigated to some extent by a recent change in USCIS policy. In December 2022, USCIS updated language on its Form N-400 receipt, Notice of Action (USCIS Form I-797), to include an automatic extension of Green Cards (Permanent Resident Cards) for twenty-four months from the "Card Expires" date listed on the Green Card.¹⁵⁹

It is, however, possible that eligible LPRs who are seeking to naturalize in order to vote in an upcoming election may delay their application if they do not believe they will be able to naturalize in time to vote in the election. Researchers from Asian Americans Advancing Justice, an affiliation organization of five civil and human rights organizations, state that “immigration service providers and immigrant rights advocates are concerned that these lengthening processing times—backlogs—will deter eligible immigrants from naturalizing,” and that individuals who apply in advance of an election may not be able to “complete the process in time to meet voter registration deadlines.”¹⁶⁰ The literature suggests that processing times and backlogs are a barrier for applicants, but more research is needed to confirm how many people this barrier affects and if the barrier causes people to discontinue their applications or only causes time delays. Future research may indicate whether the recent change to USCIS policy to automatically extend the expiration date of Green Cards after receiving a USCIS Form N-400 significantly reduces these barriers.¹⁶¹

If the application from start to finish can take almost a year, since processing times were 10.5 months in FY2022, some applicants may be deterred from applying for naturalization and instead take other routes, such as renewing their Green Card, as seen in the New America interviews. This means that delays in processing times can present a barrier to naturalization for some applicants.¹⁶² However, an executive order in 2021 directed federal agencies to develop plans to reduce naturalization processing times, so in the future, this barrier may be reduced.¹⁶³

3.4. Legal and Policy Barriers

In this section, the literature review covers information and arguments asserting that recent USCIS policies, some of which are no longer in effect, result in practices that increase the time burden on applicants and may cause stress for some applicants or a hesitancy to apply. Additionally, this section reviews literature stating that applicants face difficulty inquiring into the status of their application, which can increase the time burden of the application process by preventing applicants from making timely corrections.

3.4.1. Policies Increasing Adjudication Times

Several authors note that in the second half of the 2010s, USCIS implemented additional review criteria for naturalization applications.¹⁶⁴ Cited evidence for this shift includes changes to the USCIS mission statement, as well as the issuance of more Requests for Evidence, the creation of a denaturalization office,¹⁶⁵ and the allocation of additional resources toward fraud detection,¹⁶⁶

including reallocation from adjudication. Then USCIS Director L. Francis Cissna announced in 2018 that an office would be created to review cases of immigrants who unlawfully obtained citizenship status for referral to the U.S. Department of Justice (DOJ).¹⁶⁷ It is unclear if this office was ever launched.¹⁶⁸ The proposed denaturalization office was distinct from the Denaturalization Section created by the DOJ in February 2020, which was created to pursue similar goals as the USCIS denaturalization office.¹⁶⁹ The policy shift could have acted as a barrier for several reasons, such as by creating an institution that seemed less welcoming toward naturalization and shifting resources away from adjudication.^{xi}

First, the USCIS mission statement changed in 2018 and began to use language more associated with a homeland security focus than a benefits adjudication mission. While the current mission statement no longer uses this language, it represented an institutional change that may, at the time, have deterred applicants from applying or increased review criteria for applications submitted.¹⁷⁰ The previous mission statement used language such as “nation of immigrants” and referred to applicants as “customers,” while the 2018 mission statement used language like “safeguarding its integrity,” “protecting Americans,” and “securing the homeland.”^{xii} The Colorado State Advisory Committee to the U.S. Commission on Civil Rights (USCCR), a fact-finding federal agency focused on developing national civil rights policy and enforcing civil rights laws, which sought to study the effects of the backlog of naturalization applications in Colorado, stated in a 2018 report that this mission statement and accompanying change in the written purposes of USCIS created an “unwelcoming climate [which] can lessen interest in naturalizing and pose barriers to naturalizing.”¹⁷¹

In 2018, there also were changes to policy governing adjudications. One policy from summer 2018 superseded a prior rule permitting adjudicators to defer to previous decisions when adjudicating extension requests.¹⁷² As Jill E. Family, a law professor at Widener University, notes, this policy

^{xi} It is important to note that several of these policies have been reversed since 2021 and that even at the time, N-400 approval rates were not impacted.

^{xii} The mission statement prior to February 2018 read, “USCIS secures America’s promise as a nation of immigrants by providing accurate and useful information to our customers, granting immigration and citizenship benefits, promoting an awareness and understanding of citizenship, and ensuring the integrity of our immigration system.” The mission statement was changed in February 2018 to read, “U.S. Citizenship and Immigration Services administers the nation’s lawful immigration system, safeguarding its integrity and promise by efficiently and fairly adjudicating requests for immigration benefits while protecting Americans, securing the homeland, and honoring our values.” Since February 2022, the mission statement has read, “USCIS upholds America’s promise as a nation of welcome and possibility with fairness, integrity, and respect for all we serve” (Richard Gonzales, “America No Longer a ‘Nation of Immigrants,’ USCIS Says,” *NPR*, February 22, 2018, <https://www.npr.org/sections/thetwo-way/2018/02/22/588097749/america-no-longer-a-nation-of-immigrants-uscis-says>; “Mission and Core Values,” USCIS, DHS, last updated April 20, 2023, <https://www.uscis.gov/about-us/mission-and-core-values>).

required applications for extensions to be treated as *de novo*—that is, adjudicators could not give any weight to the fact that the same status was approved in the past for the same individual.¹⁷³ This policy change resulted in applications for extension requiring more time for both the applicant to argue for an extension and for officers to re-adjudicate the scenario without referring to previous decisions.¹⁷⁴ This policy from summer 2018 was eventually superseded again by a new policy in 2021, which directs adjudicators to give deference to prior determinations in many circumstances.¹⁷⁵ The new policy instituted in 2021 is still in effect at the time of writing. While researchers have not been able to locate any causal evidence that this policy of not giving deference to prior determinations in extension applications directly resulted in delays or unfinished naturalization applications, Family states that the policy reflected an increased procedural burden for applications, effectively meaning that applying for benefits like naturalization became more difficult.¹⁷⁶

A separate policy enacted in 2018 allowed officers to deny benefit requests, such as citizenship applications, for lack of supporting evidence without first sending the applicant a Request for Evidence (RFE) or Notice of Intent to Deny (NOID).¹⁷⁷ An RFE is used by adjudicators when they feel more evidence is needed to decide whether to grant a benefit.¹⁷⁸ This change meant that if an applicant were rejected, they would need to either appeal their case or refile their application and pay the filing fees again before they could submit documents or information supporting their application. As several scholars have stated, this change likely caused an increased burden on applicants.¹⁷⁹ Further, a USCIS Policy Alert from June 2021 described not only an “increased burden on benefit requestors” because of this policy, but stated that it was “an inefficient use of USCIS resources” and that “the use of an RFE or NOID, rather than a denial, generally saves both benefit requestors and USCIS time and money.”¹⁸⁰ This Policy Alert reverted many of the changes caused by the 2018 policy by directing officers to generally issue an RFE or NOID if further evidence could show that an applicant is eligible for a benefit.¹⁸¹ Further research is necessary to determine the causal impact of these policy changes, including if or how often officers denied benefit applications when additional evidence may have resulted in an eligible rating.

Overlapping the period when the two policies discussed above were in effect between 2018 and 2021, analysis of survey data from 200 naturalization service providers in thirty-four metro areas by the Migration Policy Institute shows that USCIS adjudicators were issuing RFEs more frequently between 2017 and 2019 than previously.¹⁸² More specifically, more than one-third of respondents stated that USCIS issued RFEs more often between 2017 and 2019, according to the 2019 survey results.¹⁸³ It is possible that the policy prohibiting adjudicators from deferring to previous decisions when considering an application for extension of a previously approved status caused adjudicators to issue more RFEs. This increased use of RFEs potentially affected naturalization

applicants because issuing more RFEs results in extending the adjudication process and can increase waiting times.¹⁸⁴

Along the same lines as increased usage of RFEs, that same survey notes USCIS utilized additional review practices throughout the adjudication process, reflecting changed practices at USCIS since 2016. Approximately 25 percent of respondents noted that interviews “doubled in length,” 10 percent stated that English and civics tests were given “more strictly,” 33 percent said adjudicators asked for documents not usually requested, and 20 percent said the standards for good moral character were raised, among other data, which suggests that the process was more extensive than in the past. Similarly, the researchers at the Migration Policy Institute noted that 22 percent more naturalization applications and other applications were referred to the Fraud Detection and National Security directorate in FY2019 than in FY2018.¹⁸⁵ The Colorado State Advisory Committee to the USCCR found the same, that increased resources were allocated to Fraud Detection and National Security, and stated that this allocated resources away from efficiency and negatively impacted the completion rate, again increasing the amount of time applicants must spend waiting.¹⁸⁶ However, denial rates were unaffected, remaining around 13–14 percent since 2009, which indicates that increased scrutiny did not result in increased denials, only possibly a more strenuous and lengthy adjudication process.¹⁸⁷

While denial rates remained flat, these practices in sum likely increased fear of applying for naturalization and for those who did apply, caused some to dedicate more resources to the process, predominantly in time. The Colorado State Advisory Committee to the USCCR stated that “these higher standards have a discouraging effect on applicants pursuing naturalization and likely contribute to an increase in processing times once an application has been filed.”¹⁸⁸ It is unclear whether and how many people these policies caused to not apply or suspend an application. While several of these policies have been noted as no longer in effect, their recency likely has a lingering impact. More research into the effect of existing policies is needed as researchers struggled to uncover examinations of naturalization policies before 2016 and since 2021.

3.4.2. Decreased Transparency in Adjudicative Process

Reports from academic researchers, immigration legal experts, and the Colorado State Advisory Committee to the USCCR reviewing backlogs also note changes in agency practices in the late 2010s, which reduced transparency, or the ability of applicants and their representatives to inquire about the status of their case or resolve issues with their case.¹⁸⁹ Primarily, USCIS discontinued the “InfoPass” appointment software, which applicants could use to schedule in-person meetings with USCIS about adjudication issues.¹⁹⁰ USCIS has replaced InfoPass with a new system that requires

applicants to request an appointment through the USCIS Contact Center, which they can approve or deny based on the center's determination of customer need.¹⁹¹ Now, USCIS encourages applicants to use this new computerized system that Ming H. Chen and Zachary New, researchers at the University of Colorado Law School, noted in 2019 can be less personal and make it more difficult to get details about cases.¹⁹²

The Colorado State Advisory Committee to the USCCR, drawing from a combination of qualitative and quantitative evidence presented in expert panel discussions and a community forum for various stakeholder testimony, issued a report that states more broadly that too few opportunities exist for applicants to communicate with USCIS about their applications and settle case issues. The report also states that prior to an interview, there is no mandate for a response timeline by USCIS. After an interview, there are statutory requirements for the time period related to processing. The report concludes then that after a person's submission of an application and prior to the interview, applicants could be "caught in a legal limbo" where their only option to compel adjudication is litigation, which can be resource intensive; applicants also may fear initiating litigation due to potential retaliation in the adjudication process.¹⁹³

Taken together, while applicants have some abilities and avenues to inquire about the status of their application and reasons for delays, reports from legal experts, academics, and the Colorado State Advisory Committee to the USCCR find that the transparency of the process could be improved and that the current state of affairs results in time delays, which may act as a barrier.

4. CONCLUSION AND RECOMMENDATIONS FOR FUTURE RESEARCH

This review of the literature revealed a gap between those eligible each year to apply for naturalization and the number of naturalization applications submitted. It also showed a larger trend of naturalization rates lagging behind the growth of the foreign-born population in the United States. Analysis of interviews and U.S. Census Bureau ACS data reveal that much of the eligible-to-naturalize population faces several barriers prior to beginning the naturalization process, including issues with the cost of the application, lack of information about how to apply, and legal restrictions on eligibility. Social factors such as English language skills and family dynamics also can play a role in eligible individuals' decision to initiate naturalization. While there is some debate in the literature regarding the price sensitivity of the eligible-to-naturalize population, more recent experimental studies demonstrate that the eligible-to-naturalize population is affected by economic barriers, including the cost of the naturalization application.

Randomized experimental studies of low-income immigrant populations in New York City show that economic barriers, including high application fees, are among the most influential factors in preventing these individuals from initiating the naturalization process. These findings appear to support the argument that the eligible-to-naturalize population is price sensitive but more research into these economic barriers is needed to make a definitive claim. Similar experimental studies also reveal that access to information about fee waiver eligibility can increase application rates, which suggests that these cost barriers are exacerbated by information access barriers. The results of these studies suggest that additional factors, including confusion regarding the application process, lower English language proficiency, and lower educational attainment, also have a compounding impact on naturalization initiation. However, further experimental or quasi-experimental research focusing on these individual factors is needed to determine the full effect.

Overall, there is a fair amount of observational data on barriers to initiating naturalization gathered through immigrant surveys and historical statistics from ACS and USCIS application records, but a lack of experimental studies that measure the effect of specific barriers on the decision to submit an application. Future research with experimental or quasi-experimental designs, such as the designs used in IPL's randomized studies, would provide significant steps in clarifying the individual causal effects of the multifaceted combination of barriers faced by eligible individuals.

Additionally, multiple observational surveys and interviews state that there are barriers after beginning the naturalization application. These sources describe that some applicants find the application and adjudication process to be confusing and complex, including the actual N-400

text, as well as a time burden. Some, such as non-White applicants, Hispanic applicants, male applicants, and applicants from Muslim-majority countries may face lower naturalization approval odds than non-Hispanic, White applicants, female applicants, and applicants from other countries. It is important to note, however, that the reason for this disparity is unclear and the supporting evidence is correlational. No causal relationship between applicants' race/ethnicity, gender, religion, or country of origin and odds of naturalization can be established based on the evidence currently available.

Initial evidence also suggests that backlog and processing delays can act as a barrier by increasing the time applicants must spend in the adjudication process, which can cause issues for some applicants, like those whose Green Card may expire soon. Recent policy decisions, some of which are no longer in effect, can compound these time delays due to additional review criteria for applications and reduced transparency in the process. However, to date, only anecdotal and small sample interview evidence exists to indicate that backlogs impede individuals from starting or completing their applications. It is generally unknown whether, and to what extent, these barriers can cause an individual to apply or suspend their application. Observational studies are unable to confirm causal relationships between the factors listed above and an individual's likelihood to naturalize. Future studies with quasi-experimental or experimental designs that rigorously evaluate these potential barriers would be extremely useful to confirm whether, and to what extent, these post-application barriers exist.

Recommendations for Future Research

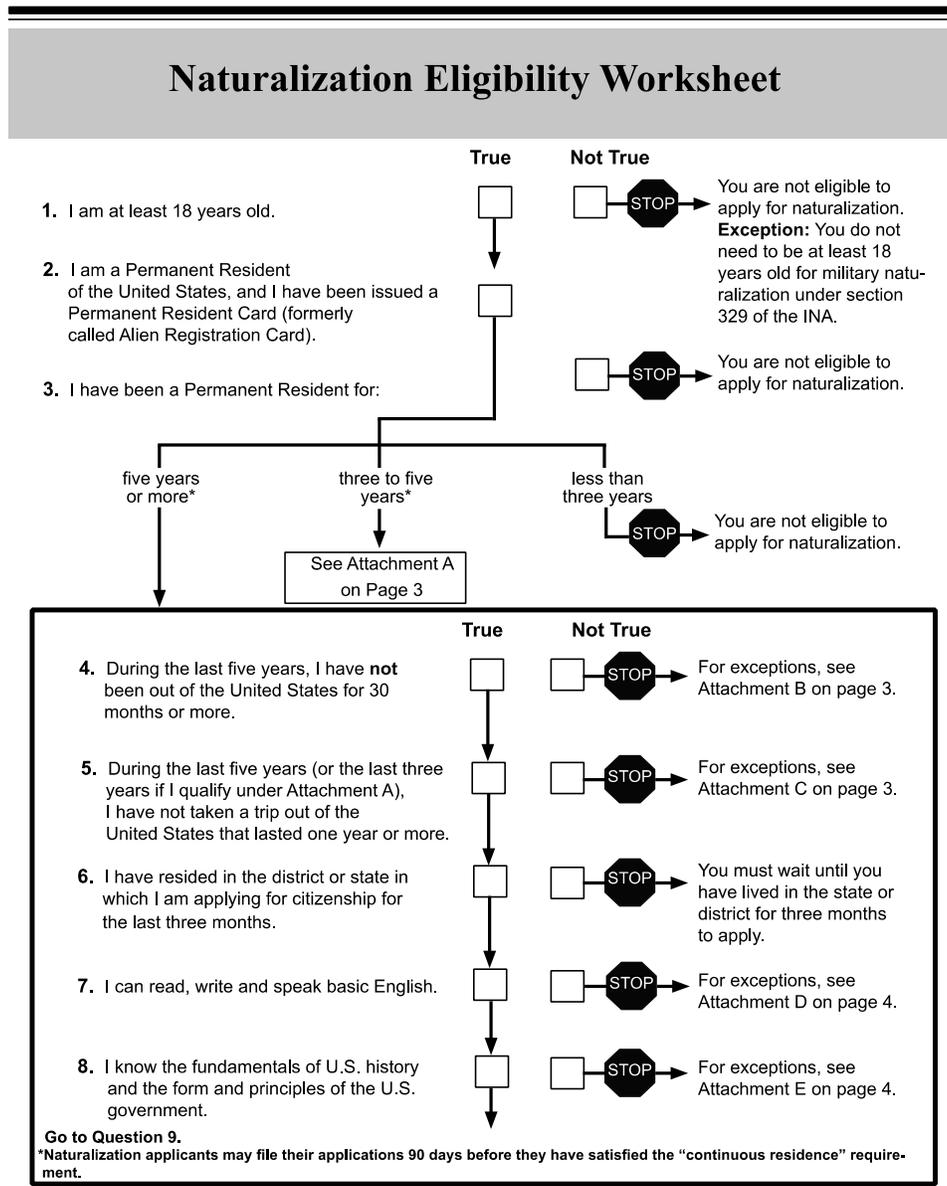
FRD developed the following eleven recommendations for future research:

1. Developing experimental or quasi-experimental studies is necessary to identify causal relationships between a possible barrier and potential applicants prior to initiating the naturalization application. There is a significant dearth of causal studies in this realm.
2. Further rigorous research is needed to explain the additional barriers low-income immigrants face prior to initiating the naturalization application process beyond cost and information access.
3. While there is no one solution that addresses the issues presented by the identified barriers, further research is needed on possible ways to alleviate these obstacles, such as increasing financial aid to naturalization seekers and providing education on the naturalization process to eligible applicants with limited English proficiency.

4. Further research into the effects of fee increases in recent decades using American Community Survey data may help develop a clearer understanding of price sensitivity among those eligible to naturalize.
5. More research into explanations for the differences in naturalization rates between refugees and non-refugee LPRs is necessary to identify specific barriers faced by non-refugee LPRs.
6. Future research is needed to determine whether the increased use of virtual immigration services, especially since the COVID-19 pandemic, has affected eligible LPRs' access to immigration service providers and alleviated some of the barriers to naturalization caused by information access disparities. This research could include interviews of immigration service providers and other organizations providing these virtual services.
7. Future research should compare the different reasons among eligible individuals for not initiating the naturalization application, or for starting the naturalization application and dropping out. Demographic characteristics to disaggregate include income, English language proficiency, educational attainment, and country of origin. In particular, FRD recommends conducting interviews with individuals who may be eligible to naturalize and individuals who have started the naturalization application to determine what effect these factors had upon their decision to naturalize.
8. Research on applicants' understanding of the N-400 form and any areas of confusion could serve as a first step toward removing barriers associated with the form's complexity.
9. More research, specifically research utilizing experimental methods, examining the differences in naturalization application approval rates across different demographics—specifically race/ethnicity, gender, religion, income, and education—is needed to understand the root causes of these differences.
10. Research confirming if backlog or processing delays deter potential applicants from applying for naturalization also is necessary. Prioritization of an experimental or quasi-experimental design to confirm a causal relationship would be particularly helpful.
11. Examining the role of current USCIS policies as barriers to naturalization may be necessary as recent research mostly focuses on policies from the late 2010s, which have since been superseded. These policies include, in particular, those addressed by USCIS Policy Alerts on April 27, 2021, regarding deference to prior determinations of eligibility in requests for extensions of petition validity, and on June 9, 2021, regarding Requests for Evidence and Notices of Intent to Deny.¹⁹⁴

5. APPENDIX I: USCIS Form M-480 Naturalization Eligibility Worksheet

Interested individuals must determine if they are eligible for naturalization as an important first step in the naturalization process. The USCIS Form M-480, "Naturalization Eligibility Worksheet," provided below is intended to serve as a tool for individuals who are considering naturalization based on their years as Permanent Residents.¹⁹⁵ If an individual meets the eligibility requirements outlined in USCIS Form M-480, the naturalization process proceeds with the submission of USCIS Form N-400 as displayed in Appendix II, Flowchart for Naturalization Process.



Naturalization Eligibility Worksheet

	True	Not True	
9. I am a person of good moral character.	<input type="checkbox"/>	<input type="checkbox"/>	You are not eligible to apply for naturalization.
10. One of the following is true: (a) I am female, or (b) I am a male registered with the Selective Service, or (c) I am a male who did not enter the United States under any status until after my 26th birthday, or (d) I am a male who was in the United States between the ages of 18 and 26 but who did not register with the Selective Service, and I will send a "Status Information Letter" from the Selective Service explaining why I did not register with my application. (e) I am a male who was in the United States between the ages of 18 and 26 as a lawful nonimmigrant.	<input type="checkbox"/>	<input type="checkbox"/>	You are not eligible to apply for naturalization.
11. I have never deserted from the U.S. Armed Forces.	<input type="checkbox"/>	<input type="checkbox"/>	You are not eligible to apply for naturalization.
12. I have never received an exemption or discharge from the U.S. Armed Forces on the grounds that I am an alien.	<input type="checkbox"/>	<input type="checkbox"/>	You are not eligible to apply for naturalization.
13. I am willing to perform either military or civilian service for the United States if required by law. (NOTE: If your religious teachings and beliefs prohibit you from performing military service, you must be willing to perform non-military service.)	<input type="checkbox"/>	<input type="checkbox"/>	You are not eligible to apply for naturalization.
14. I will support the Constitution of the United States.	<input type="checkbox"/>	<input type="checkbox"/>	You are not eligible to apply for naturalization.
15. I understand and am willing to take an oath of allegiance to the United States.	<input type="checkbox"/>	<input type="checkbox"/>	You are not eligible to apply for naturalization.

STOP HERE: You are probably eligible to apply for naturalization. Please call the Forms Line (1-800-870-3676) for an "Application for Naturalization" (Form N-400) and be sure to read *A Guide to Naturalization*.

Attachment A - Naturalization Eligibility Worksheet

I have been a Permanent Resident for three to five years

	True	Not True	
I am married to, and living with, a U.S. citizen.	<input type="checkbox"/>	<input type="checkbox"/> STOP	You are not eligible to apply for naturalization.
I have been married to that U.S. citizen for at least the past three years.	<input type="checkbox"/>	<input type="checkbox"/> STOP	You are not eligible to apply for naturalization.
My spouse has been a U.S. citizen for at least the past three years.	<input type="checkbox"/>	<input type="checkbox"/> STOP	You are not eligible to apply for naturalization.
During the past three years, I have not been out of the country for 18 months or more.	<input type="checkbox"/>	<input type="checkbox"/> STOP	You are not eligible to apply for naturalization.

If you answered "True" to all four questions, go to Question 5 on page 1.

Attachment B

I have been out of the country for 30 months or more

	True	Not True	
I am: (a) A person who has served on board a vessel operated by or registered in the United States, or (b) An employee or an individual under contract to the U.S. Government, or (c) A person who performs ministerial or priestly functions for a religious denomination or an interdenominational organization with a valid presence in the United States.	<input type="checkbox"/>	<input type="checkbox"/> STOP	You are not eligible to apply for naturalization.

If you answered "True," see pages 20 and 21 in *A Guide to Naturalization* to get more information and go to Question 5 on page 1.

Attachment C

I have been out of the country for one year or more

	True	Not True	
Since becoming a Permanent Resident, I have not taken a trip out of the United States that lasted for one year or more without an approved "Application to Preserve Residence for Naturalization Purposes" (Form N-470). NOTE: Only certain persons can use Form N-470. See Pages 18-21 in <i>A Guide to Naturalization</i> for more information.	<input type="checkbox"/>	<input type="checkbox"/> STOP	You are not eligible to apply for naturalization.

If you answered "True," go to Question 6 on page 1.

Attachment D - Naturalization Eligibility Worksheet

I cannot read, write or speak basic English

	True		Not True	
I am over 50 years old and have lived in the United States for at least 20 years since I became a Permanent Resident, or	<input type="checkbox"/>	↓	<input type="checkbox"/>	You are not eligible to apply for naturalization.
I am over 55 years old and have lived in the United States for at least 15 years since I became a Permanent Resident, or	<input type="checkbox"/>	↓	<input type="checkbox"/>	You are not eligible to apply for naturalization.
I have a disability that prevents me from fulfilling this requirement and will be filing a "Medical Certification for Disability Exceptions" (Form N-648) completed and signed by a doctor with my application.	<input type="checkbox"/>	↓	<input type="checkbox"/>	You are not eligible to apply for naturalization.
NOTE: Only certain people can use this exemption. See pages 26 and 27 in <i>A Guide to Naturalization</i> for more information.				

If you answered "True" to one of these questions, go to Question 8 on page 1.

Attachment E

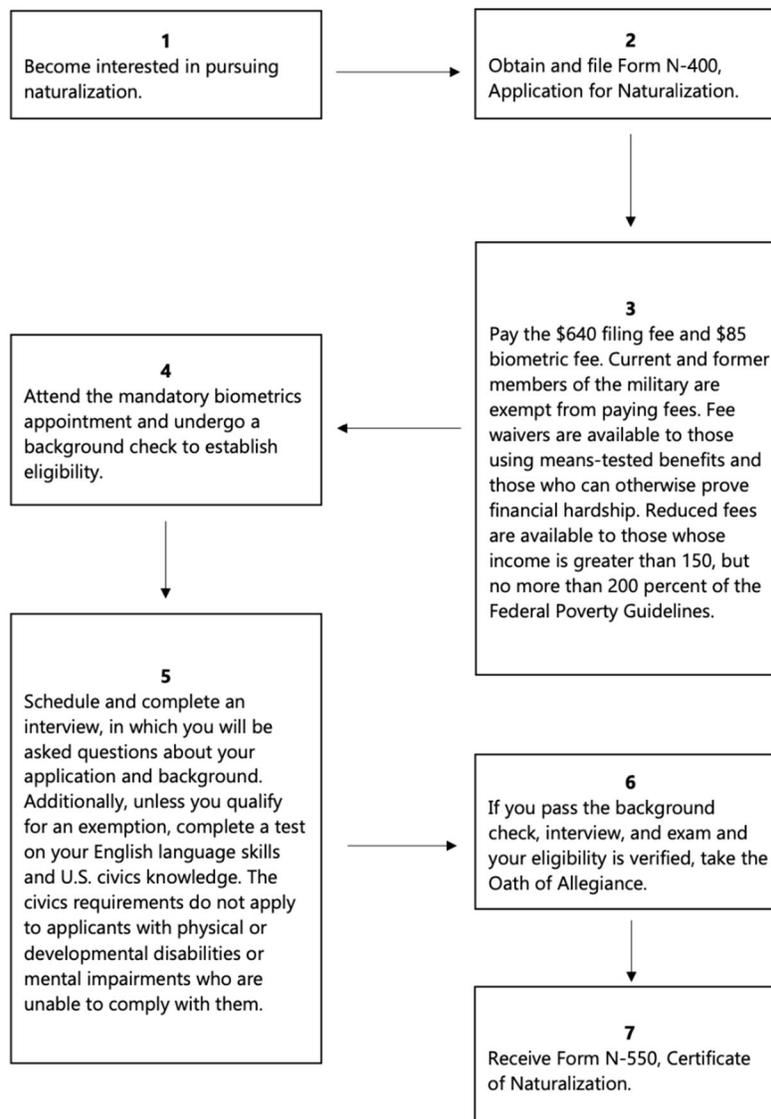
I have a disability that prevents me from fulfilling the civics requirement

	True		Not True	
I have a disability that prevents me from fulfilling the civics requirement, and I will be filing "Medical Certification for Disability Exceptions" (Form N-648) completed and signed by a doctor with my application.	<input type="checkbox"/>	↓	<input type="checkbox"/>	You are not eligible to apply for naturalization.
NOTE: Only certain people can use this exemption. See pages 26 and 27 in <i>A Guide to Naturalization</i> for more information.				

If you answered "True" to the question, go to Question 9 on page 2.

6. APPENDIX II: Flow Chart for Naturalization Process

The flow chart below displays a simplified overview of the naturalization process beginning from when an individual decides to pursue naturalization and ending with the recipient of USCIS Form N-550, Certificate of Naturalization. Unlike USCIS Form M-480, Naturalization Eligibility Worksheet, this flow chart does not show the process of determining eligibility for naturalization. Instead, this flow chart begins where USCIS Form M-480 ends and outlines the process for naturalization once eligibility is confirmed.



7. NOTES

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