



PROJECT CITIZENSHIP

4 Faneuil South Market Building
3rd Floor, Suite 4005
Boston, MA 02109

May 14, 2021

Samantha Deshommes
Chief, Regulatory Coordination Division, Office of Policy and Strategy
U.S. Citizenship and Immigration Services, Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

*Re: Identifying Barriers Across U.S. Citizenship and Immigration Services (USCIS)
Benefits and Services, Request for Public Input, Docket No. USCIS-2021-0004*

Dear Ms. Deshommes:

Project Citizenship thanks the United States Citizenship and Immigration Services (“USCIS”) for the opportunity to comment on how USCIS can reduce administrative and other barriers and burdens within its regulations and policies, including those that prevent foreign citizens from easily obtaining access to immigration services and benefits.

Project Citizenship is a nonprofit organization based in Boston, Massachusetts. Launched in 2014, Project Citizenship specializes in helping permanent residents in Massachusetts and beyond overcome barriers to U.S. citizenship. Our mission is to ensure that all immigrants understand and have access to a path to citizenship, regardless of their ability to pay. Since 2014, Project Citizenship has helped over 8,257 lawful permanent residents apply for citizenship through its dedicated full-time staff, pro bono legal partners, and more than 1,000 trained volunteers. We have a 95% success rate.

Reducing administrative barriers to naturalization will help further Project Citizenship’s goal of promoting citizenship so that all naturalized citizens can participate in democracy and be civically engaged. Project Citizenship submits the following proposed recommendations in support of that goal.

I. Remove Unnecessary Barriers to Naturalization by Amending the Agency’s Notice to Appear Policy

A. The Threat of Receiving a Notice to Appear Engenders Fear and Discourages Individuals from Applying for Naturalization

Every year, potential applicants, including many of our clients, who meet all of the eligibility requirements for U.S. citizenship decide to forgo filing their N-400 applications for

(617) 694-5949 | www.projectcitizenship.org | Fax: (617) 859-9993



naturalization. Although these individuals are eligible for naturalization, they either have heard about or know someone who has been summoned to immigration court as a result of filing an N-400 application. Even if an individual has no logical reason to believe that they will be denied citizenship, they may ultimately decide not to apply out of fear that USCIS will provide them not with an approval of naturalization, but instead with a Notice to Appear (“NTA”) in immigration court.

Although U.S. Immigration and Customs Enforcement (“ICE”) is the agency that most frequently issues NTAs, there are instances in which USCIS is required by statute or regulation to issue an NTA. However, USCIS is **never required** by statute or regulation to issue an NTA as a result of the information provided in an N-400 application. Instead, USCIS policy dictates when the agency will issue an NTA in such cases. Therefore, a USCIS policy prohibiting the issuance of NTAs on the basis of information provided in an N-400 application does not conflict with statute or regulation. For the reasons outlined below, such a policy is desirable.

On November 7, 2011, the Obama Administration issued a policy memorandum instructing USCIS to conduct a thorough review process that considers the totality of circumstances before issuing an NTA to naturalization applicants submitting a Form N-400.¹ In cases of Egregious Public Safety (“EPS”) or in certain non-EPS criminal cases, USCIS referred the case to ICE rather than issuing an NTA directly.² The Trump Administration greatly expanded USCIS’s authority to issue NTAs directly in response to an N-400 application. On June 28, 2018, USCIS issued a policy memorandum in which it directed USCIS officials to issue NTAs directly to naturalization applicants in all EPS and non-EPS cases, as well as in all cases where an N-400 application was denied on good moral character grounds based on an underlying criminal offense.³ Furthermore, the memorandum removed the rigorous review process required under the Obama Administration, instead allowing for the exercise of prosecutorial discretion “in very limited circumstances.”⁴ On January 20, 2021, DHS Acting Secretary rescinded the June 28, 2018 policy memorandum.⁵ However, it is not clear that USCIS has returned to their November 7, 2011 practices.⁶ The Biden Administration should issue updated NTA guidance for USCIS and remove the threat of removal proceedings for naturalization applicants.

¹ See USCIS Policy Memorandum, Revised Guidance for the Referral of Cases and Issuance of Notices to Appear (NTAs) in Cases Involving Inadmissible and Removable Aliens (November 7, 2011), <https://www.uscis.gov/sites/default/files/document/memos/NTA%20PM%20%28Approved%20as%20final%2011-7-11%29.pdf>.

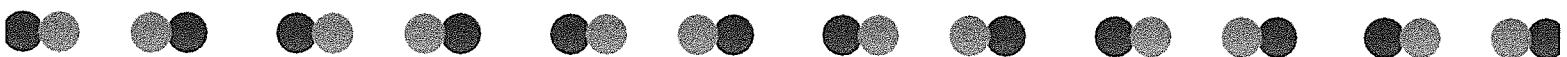
² *Id.*

³ See USCIS Policy Memorandum, Updated Guidance for the Referral of Cases and Issuance of Notices to Appear (NTAs) in Cases Involving Inadmissible and Deportable Aliens (June 28, 2018), <https://www.uscis.gov/sites/default/files/document/memos/2018-06-28-PM-602-0050.1-Guidance-for-Referral-of-Cases-and-Issuance-of-NTA.pdf>.

⁴ *Id.*

⁵ DHS Memorandum, Review of and Interim Revision to Civil Immigration Enforcement and Removal Policies and Priorities (January 20, 2021), https://www.dhs.gov/sites/default/files/publications/21_0120_enforcement-memo_signed.pdf

⁶ See USCIS, Notice to Appear Policy Memorandum (last updated February 26, 2019), <https://www.uscis.gov/laws-and-policy/other-resources/notice-to-appear-policy-memorandum>



B. Information Provided in N-400 Applications for Naturalization Should Not Be Used for Enforcement Purposes

The Obama Administration policy allowing for N-400 applications to trigger the issuance of NTAs, which was dramatically enhanced by the Trump Administration, creates an undue barrier for lawful permanent residents applying for U.S. citizenship. The purpose of the N-400 is to allow lawful permanent residents to take the first step towards becoming a U.S. citizen. Naturalization is a dream for countless lawfully abiding residents who contribute to the fabric of our society. When considering the benefits of increased citizenship not only to naturalized individuals but also to this country's society and economy, eligible lawful permanent residents should be encouraged to file an N-400. In reality, however, the accompanying perceived risk of receiving an NTA instead of an approved N-400 prevents many from ever filing an application.

USCIS should look to existing internal policy, namely Deferred Action for Childhood Arrivals ("DACA"), to revise its current policy on issuing NTAs in response to N-400 applications. Under DACA, DHS is directed to use its prosecutorial discretion in not initiating removal proceedings against those who meet the eligibility criteria.⁷ USCIS should employ similar prosecutorial discretion to not initiate removal proceedings against naturalization applicants. Adopting such a policy would promote USCIS's goal of eliminating undue barriers that prevent and discourage eligible lawful permanent residents from applying for naturalization.

II. Reduce Administrative Burdens to Naturalization Applications by Streamlining Processes

A. Simplify Language and Narrow Scope of Form N-400

The greatest way that USCIS can reduce administrative barriers to naturalization is by amending Form N-400. First, the form should be amended so that plain language is used throughout. USCIS has already demonstrated a commitment to using plain language by expressing its support of the Plain Writing Act of 2010 and implementing an internal plain language program. However, this internal plan has thus far only addressed USCIS's written communications, and has not been expanded to prompt a reconsideration of the agency's various application forms.⁸ Specifically, USCIS should consider conducting paraphrase and usability testing to determine the most effective ways to make the Form N-400 less confusing and more easily accessible to people of all cultural (including, without limitation, language barriers), educational, and socioeconomic backgrounds. Other federal agencies have conducted similar testing to improve their forms.⁹ Along these lines, USCIS should also make the pdf format of

⁷ See USCIS Memorandum, Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children (June 15, 2012), <https://www.dhs.gov/xlibrary/assets/si-exercising-prosecutorial-discretion-individuals-who-came-to-us-as-children.pdf>.

⁸ See 2021 Plain Writing Act Compliance Report, Department of Homeland Security, https://www.dhs.gov/sites/default/files/publications/21_0122_plain-language-compliance-report.pdf.

⁹ See Paraphrase Testing from the Veterans Benefits Administration, Federal Plain Language Guidelines, March 2011, PLAINLANGUAGE.GOV, <https://www.plainlanguage.gov/media/FederalPLGuidelines.pdf>.



the Form N-400 more accessible. Some small changes that would vastly increase usability include: eliminate the requirement that all fields include an 8-digit date (i.e., allow for the entry of a 4-digit date of either mm/yy or yyyy); allow for the entry of commas and tildes in all fields; and increase the field character limits (e.g., under the current format, our organization's entire name "Project Citizenship" surpasses the character limit in the Preparer's Organization Name field). These efforts would promote clear communication from USCIS and increase usability for applicants, thereby reducing administrative barriers to accessing immigration benefits and services.

Second, USCIS should narrow the scope of the N-400 by eliminating questions that seek information or data that USCIS does not need and is unnecessary to achieve its regulatory objectives. To start, the agency should not require naturalization applicants to submit irrelevant or duplicative records (e.g. previously submitted evidence of birth, marriage, divorce, or criminal dispositions). Additionally, USCIS should consider amending many questions in Part 12 that seek unnecessary information. In order to be eligible for naturalization, an applicant must establish that they were "lawfully admitted" and have been a person of "good moral character" during the statutory period and meet continuous residency requirements, among other things.¹⁰ However, many questions in Part 12 of the Form N-400 go beyond this and seek information from time periods that are entirely irrelevant to an applicant's eligibility for naturalization. USCIS should tailor the scope of Part 12 and delete the words "have you **EVER**..." from the questions because such wording seeks information that reaches beyond the statutory period, and therefore has no bearing on whether a person is eligible for naturalization. Instead, USCIS should limit information sought in Part 12 to the applicant's admission and the statutory period.

B. Improvements to Naturalization Processes

USCIS should consider streamlining the naturalization process in a variety of ways that aim to eliminate administrative barriers.

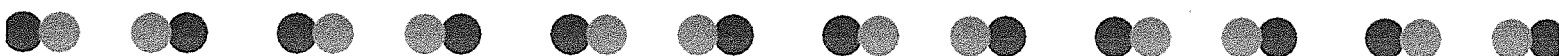
1) *Streamlining Naturalization Interviews*

First, USCIS should consider providing more applicants the option to take the Naturalization Oath of Allegiance on the same day as their naturalization interview. USCIS has already adopted a framework for conducting administrative naturalization ceremonies by designated USCIS officers¹¹ and many jurisdictions have issued orders to the same effect.¹² Expanding access to same-day swearing-in ceremonies would considerably expedite the naturalization process and reduce the backlog that has been multiplied by the coronavirus

¹⁰ INA § 316; 8 U.S.C. § 1427; INA § 319; 8 U.S.C. § 1430; INA § 328; 8 U.S.C. § 1439; INA § 329; 8 U.S.C. § 1440.

¹¹ Administrative Naturalization Ceremonies, USCIS Policy Manual, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, <https://www.uscis.gov/policy-manual/volume-12-part-j-chapter-5>.

¹² See e.g., Second Supplemental Order Concerning Naturalization Ceremonies, General Order 20-30, U.S. District Court District of MA, Jun. 30, 2020, <https://www.mad.uscourts.gov/general/pdf/announce/Gen.Order20-30-Coronavirus-Supp.OrderreNaturalizationCeremonies.pdf>.



pandemic. As of August 2020, it was estimated that 300,000 people nationwide who would normally be eligible to naturalize, would miss out on voting in the 2020 election because of the backlog of naturalization interviews and oath ceremonies.¹³ Furthermore, USCIS should allow for family members to have N-400 applications processed together (i.e. schedule biometrics, interview, oath ceremonies at the same place/date at similar times). Reducing the number of required appearances, particularly within a single family, would increase access to naturalization for many applicants for whom it is difficult to make multiple appearances due to travel time or employment and familial obligations.

Recognizing that this may not be a viable option for all applicants, including those undergoing a name change requiring a judicial order, USCIS should consider conducting remote interviews and/or oath ceremonies when convenient or necessary, for example, for elderly or disabled applicants, or in a global pandemic. The statutory requirements for the Oath of Allegiance under the Immigration and Nationality Act (“INA”) state that before being admitted to citizenship, a person shall take an oath in a public ceremony to support and defend the U.S. Constitution, bear allegiance to the United States, renounce foreign allegiances, serve in the U.S. Armed Forces, and perform noncombatant or civilian service for the United States, if needed.¹⁴ Statutory language does not expressly require that the applicant appear in person, only that “the administration of the oaths of allegiance under this section are public.”¹⁵ The “in person” requirement comes from the corresponding regulation, noting that an applicant “must appear in person in a public ceremony, unless such appearance is specifically excused.”¹⁶ Since an in-person administration of the oath ceremony is not statutorily required and may be excused, USCIS is not prohibited from administering remote oaths. The agency has the discretion to interpret its own regulations in a manner that would allow for remote oath ceremonies or waive the in-person requirement it created.¹⁷

2) Improving technological capabilities in form submissions

USCIS should consider expanding technological capabilities in submitting and processing naturalization applications. Specifically, USCIS should allow submission of the Form I-912 via online forms to permit low-income applicants to apply electronically, use of digital signatures¹⁸, and should implement one reliable way to submit an updated Form G-28 after an application has been submitted. In fact, the agency has a federal directive to do so. Last year, the President’s Office of Management and Budget (“OMB”) issued a memo directing all

¹³ Shannon Dooling, *A Naturalization Crisis: 10,000 Would-Be Voters In Mass. Might Miss Out In November*, WBUR NEWS, Aug. 6, 2020, <https://www.wbur.org/news/2020/08/06/naturalization-us-voters-november>.

¹⁴ INA § 337; 8 U.S.C. § 1448.

¹⁵ INA 337(d); *see also* 8 C.F.R. §337.1 (“[A]n applicant for naturalization shall, before being admitted to citizenship, take in a public ceremony held within the United States the following oath of allegiance”).

¹⁶ 8 C.F.R. §337.2(a).

¹⁷ Ethan Nasr & Peggy Gleason, *Remote Naturalization Oaths are Legally Permissible*, IMMIGRANT LEGAL RESOURCE CENTER, July 2020, https://www.ilrc.org/sites/default/files/resources/remote_naturalization_oaths_are_legally_permisable.pdf.

¹⁸ At a minimum, USCIS should permanently extend the no wet signature requirement policy adopted in response to the coronavirus pandemic.



federal agencies to “use the breadth of available technology capabilities to fulfill service gaps and deliver mission outcomes.”¹⁹ The OMB memo goes on to emphasize that agencies are encouraged to leverage digital methods to meet mission needs, to include leveraging digital forms and electronic signatures to the fullest extent practicable. Furthermore, many other federal agencies already allow for electronic filing of documents.²⁰ Electronic filing is even permitted by other entities involved with immigration matters. For instance, in the context of employment-based immigrant visas, parties are permitted to file electronic labor certification applications with the Department of Labor.²¹

Along these lines, USCIS should consider expanding access to its existing e-filing system to allow non-attorney representatives within law firms or recognized organizations to create and access e-filing accounts. Many other government entities, such as the IRS, allow for account creation by non-attorneys. However, USCIS currently restricts access to attorneys and U.S. Department of Justice accredited representatives only. Expanding access to non-attorney staff will eliminate unnecessary administrative and economic barriers to both law firms and legal services organizations as well as eligible applicants seeking naturalization.

C. Improvements to Derivation of Citizenship Process

Another way the agency can reduce administrative barriers to naturalization is by streamlining the derivation of citizenship process. Currently, an eligible minor who derives citizenship from a U.S. citizen parent must submit a Form N-600 to obtain a Certificate of Citizenship. Although derivation of citizenship in such situations is automatic upon the naturalization of one’s parent²², the additional step of obtaining proof of such status from USCIS adds further delay to an already time-consuming and complicated process. After filing a Form N-600, the processing time can take anywhere from 9 to 14 months.²³ However, this is only an approximation, and the processing time may be even longer for some applicants, especially if USCIS makes a request for additional information or schedules an additional interview.²⁴ In fact, the current processing time for a Form N-600 in the Boston Field Office can range up to 16 months, despite the fact that derivation of citizenship occurs automatically as a matter of law.²⁵

In order to streamline the derivation of citizenship process and drastically reduce processing delays, USCIS should allow naturalization applicants the option to file Form N-600s for their minor Legal Permanent Resident (“LPR”) children living in their legal and physical

¹⁹ OMB, Harnessing Technology to Support Mission Continuity, March 22, 2020, <https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-19.pdf>.

²⁰ IRS, Electronic Filing Options for Individuals, <https://www.irs.gov/filing/e-file-options> (last updated Apr. 14, 2021).

²¹ See Foreign Labor Certification Online Filing System, U.S. DEP’T OF LABOR, https://www.plc.doleta.gov/eta_start.cfm?actiontype=home.

²² INA § 320; 8 U.S.C. § 1431.

²³ Form N-600 Processing Time, CITIZEN PATH, <https://citizenpath.com/form-n-600-processing-time/>.

²⁴ *Id.*

²⁵ Processing Time for Application for Certificate of Citizenship (N-600) at Boston MA, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, <https://egov.uscis.gov/processing-times/> (last visited May 6, 2021).



custody concurrently. The Form N-400 and any Form N-600 should be processed simultaneously. Once the application for naturalization is conditionally approved, USCIS can prepare a Certificate of Citizenship for each minor LPR child that can be provided to the parent at their oath ceremony.

Furthermore, USCIS should remove the requirement that passport photos must be sent to the USCIS Lockbox with Form N-600 if they cannot be transferred to the USCIS Field Office (such that the Field Office must request additional passport photos to complete adjudication).

Adopting these recommendations would reduce administrative barriers to naturalization by eliminating unnecessary waiting periods and simplifying requirements for eligible minors to receive a Certificate of Citizenship. Processing related forms within a single family simultaneously will eliminate the review of redundant materials and conserve limited USCIS resources. Furthermore, USCIS has already adopted concurrent filing review processes, such as in the case of a concurrent filing of Form I-485 and an underlying visa petition, which can be easily applied to the present context.²⁶

III. Reduce Barriers and Increase Access to Immigration Benefits for Low-Income Applicants and Applicants with Disabilities

A. Provide Clearer Guidance on What Constitutes Financial Hardship

Naturalization applicants may apply for a fee waiver if they provide adequate documentation showing that they qualify based on one of three criteria, one of which is that the applicant is “currently experiencing financial hardship that prevents [the applicant] from paying the filing fee, including unexpected medical bills or emergencies.”²⁷ Exactly what constitutes financial hardship, however, is unclear. Our organization has submitted numerous petitions with ample supporting documentation requesting fee waivers on behalf of individuals experiencing various types of financial hardship. All of these applications have been rejected. None of the rejected applications provided an adequate explanation for such rejection.

A Policy Memorandum released on March 13, 2011 provides examples of individuals experiencing financial hardship as well as documentation that USCIS would consider in evaluating whether an individual meets their standard.²⁸ While these examples appear to provide useful guidance, our experience in requesting fee waivers based on financial hardship proves that

²⁶ See Green Card Processes and Procedures, Concurrent Filing of Form I-485, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, <https://www.uscis.gov/green-card/green-card-processes-and-procedures/concurrent-filing-of-form-i-485> (last updated Nov. 10, 2020).

²⁷ USCIS, *Additional Information on Filing a Fee Waiver*, <https://www.uscis.gov/forms/filing-fees/additional-information-on-filing-a-fee-waiver>

²⁸ See USCIS Policy Memorandum, Fee Waiver Guidelines as Established by the Final Rule of the USCIS Fee Schedule; Revisions to *Adjudicator's Field Manual (AFM)* Chapter 10.9, *AFM* Update AD11-26 (March 13, 2011), https://www.uscis.gov/sites/default/files/document/memos/FeeWaiverGuidelines_Established_by_the_Final%20Rule_USCISFeeSchedule.pdf



such guidance is nothing more than a mirage. USCIS should ensure that it is following the 2011 Policy Memo when reviewing fee waiver requests based on financial hardship. Furthermore, USCIS must provide clearer guidance regarding documentation required to prove financial hardship.

B. Allow for Reduced Fee Requests with Form N-600

Currently, Form I-942 Requests for Reduced Fee may only accompany Form N-400. USCIS should extend the option to apply for a reduced fee when filing Form N-600. Many of our clients require a Certificate of Citizenship for a variety of reasons such as to obtain a U.S. passport, apply for certain jobs, or to obtain other federal benefits, such as financial aid. Unfortunately, the majority of our clients cannot afford to pay the \$1,170 filing fee. Nevertheless, due to the stringent requirements to receive a fee waiver, some of our clients' requests for a fee waiver are rejected, leaving them unable to apply for a Certificate of Citizenship. As a result, many U.S. citizens are left without this proof and struggle to access the many benefits of citizenship.

C. Revert to Edition 05/23/19 of Form N-648

Not only is the current edition 07/23/20 of Form N-648 three pages (50%) longer than the previous form, but it also is unnecessarily and restrictively burdensome. Federal regulations merely require a medical professional to "be able to attest to the origin, nature, and extent of the medical condition as it relates to the disability" when completing Form N-648.²⁹ With the recent changes, however, the current form exceeds the scope of the regulations.

The following questions did not appear on the previous edition of the Form N-648 and exceed the scope of the regulations:

- i) Part 3.3: date when *each* disability and/or impairment began
- ii) Part 3.4: date of diagnosis
- iii) Part 3.7: severity of each disability and/or impairment
- iv) Part 3.8: how each relevant disability and/or impairment affects specific functions of the applicant's daily life
- v) Part 3.9–10: whether the disabilities and/or impairments lasted or are expected to last 12 months or more, and if so, why
- vi) Part 3.17–22: numerous additional questions regarding treatment
- vii) Part 4.9–10: if telephonic interpreter was used, whether the medical professional asked the interpreter to affirm their fluency in English and accuracy in interpretation

These unnecessarily burdensome and lengthy sections create a barrier for disabled individuals seeking exception to the U.S. history and government knowledge requirements. The

²⁹ See 8 C.F.R. § 312.2(b)(2).



questions are not necessary to determine whether an applicant is eligible for the waiver and interfere with medical professionals' abilities to perform their essential duties by requiring them to spend excessive time completing Form N-648.

Additionally, the last sentence of the section of the instructions to Form N-648 titled "Who should submit Form N-648 and when?" should be deleted. There is no requirement that Form N-648 be completed within six months of filing the accompanying Form N-400. The USCIS policy manual merely states that a Form N-648 that was completed more than six months before filing the Form N-400 may give rise to credible doubts during adjudication of Form N-648.³⁰ Therefore, the current Form N-648 instructions are misleading and could cause otherwise eligible individuals to forgo including a completed Form N-648 with their application for naturalization.

Finally, the list of medical professionals authorized to certify the disability exception is outdated and severely reduces the opportunity for disabled individuals to naturalize. First, nurse practitioners should be authorized to certify Form N-648. Nurse practitioners increasingly fill the gaps in health care caused by a shortage of primary care providers. Like a doctor, a nurse practitioner can serve as a primary care provider, diagnose and treat acute conditions, and order diagnostic tests.³¹ All nurse practitioners must have a master's or doctoral degree and have completed advanced clinical training beyond what is required of registered nurses.³² At the very least, nurse practitioners should be authorized to conduct the examination of the applicant to then be certified by a medical doctor.

Second, medical professionals should be permitted to conduct telehealth examinations for purposes of certifying the Form N-648. Not only has the use and efficiency of telehealth been greatly accelerated by the COVID-19 pandemic, but the benefits have become widely accepted. The American Academy of Family Physicians promotes greater use of telehealth beyond the pandemic: "Congress should re-introduce and pass the Expanding Access to Telehealth Act, which ensures that Medicare beneficiaries can continue to access evaluation and management (E/M) and mental health services provided via telehealth beyond the public health emergency."³³ Access to in-person medical visits is limited for a large portion of this country due to lack of transportation and inflexible employment schedules. Telehealth is an easy, effective, and cost-efficient way to reduce this barrier.

³⁰ USCIS Policy Manual, Chapter 3 – Medical Disability Exception (Form N-648), <https://www.uscis.gov/policy-manual/volume-12-part-e-chapter-3>

³¹ See Cedars Sinai, *Can I See a Nurse Practitioner Instead of a Doctor?* (January 27, 2019), <https://www.cedars-sinai.org/blog/difference-nurse-practitioner-vs-doctor.html>

³² See American Association of Nurse Practitioners, *What's a Nurse Practitioner (NP)?*, <https://www.aanp.org/about/all-about-nps/whats-a-nurse-practitioner>

³³ American Academy of Family Physicians, *Preserving Access to Telehealth Beyond COVID-19*, https://www.aafp.org/dam/AAFP/documents/advocacy/health_it/telehealth/BKG-Telehealth.pdf



IV. Reduce administrative barriers for non-English speakers

Language Accessibility for Non-English speakers

USCIS should communicate with exempt (or excepted) applicants in their native language. For example, all correspondence between USCIS and these non-English speaking applicants, such as appointment notices, should be in the applicant's native language.

V. Minimize the negative impacts of COVID-19 pandemic


Continuous Residence

USCIS should publish guidance on the effect of extended travel abroad (i.e. over six months or one year) due to COVID-19 on naturalization eligibility. Naturalization applicants who resided outside of the U.S. for over one year due to the pandemic should not be considered to have broken their continuity of residence. Furthermore, applicants who resided outside of the U.S. for over six months should not have to rebut a presumption of a break in their continuity of residence.

VI. Conclusion

The mission of Project Citizenship is to provide free, timely, high-quality legal services, promote citizenship, and increase naturalization in Massachusetts and beyond. The proposed changes laid out in this comment will aid in our efforts to increase citizenship and its many benefits by reducing the barriers many of our clients face when attempting to access the immigration benefits offered by USCIS. Furthermore, the proposed changes will increase USCIS's efficiency in processing naturalization and Certificate of Citizenship applications, which will reduce the backlog of N-400 and N-600 applications. Finally, an increase in citizenship benefits the U.S. economy and contributes to a vibrant and dynamic society.

Thank you,



Mitra Shavarini
Executive Director
Project Citizenship
4 Faneuil South Market Building
3rd Floor
Boston, MA 02109

