

REPORT TO THE LEGISLATURE

Naturalization Services

Chapter 415, Laws of 2019 (ESHB 1109 Section 205 (4))

January 1, 2020

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EXECUTIVE SUMMARY

Chapter 415, Laws of 2019 (ESHB 1109 Section 205 (4)) requires the Department of Social and Health Services (DSHS or the Department) to annually report all sources of available funding for naturalization services during the current fiscal year, amounts expended to date by service type and funding source, the number of participants served, and program outcome data.

This report covers state fiscal year (SFY) 2019 (July 1, 2018 – June 30, 2019).

Program Overview

The Office of Refugee and Immigrant Assistance (ORIA) is located within the Department of Social and Health Services (DSHS), Economic Services Administration, Community Services Division, and administers \$24 million in federal and state dollars to support holistic services for refugees and immigrants living in Washington state. More than 60 providers serve over 9,000¹ individuals annually. Through a network of community-based providers, ORIA delivers services that provide individuals and families with the resources they need to rebuild their lives from the moment of their arrival in Washington to becoming naturalized U.S. citizens.

These services are part of 13 different programs that fall into four core areas: Refugee Health and Wellness, Employment and Training Services, Immigration Assistance and Naturalization Services, and Whole Family Services. Some examples of services offered include Refugee Cash Assistance and Refugee Medical Assistance (RCA/RMA) programs, comprehensive case management, self-sufficiency education, immigration assistance, refugee health and mental health services, employment assistance, English as a second language (ESL) services, unaccompanied refugee minor foster care, youth educational activities, elderly services and naturalization services.

Naturalization is the process by which the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS) grants U.S. citizenship to a legal immigrant after he or she fulfills the requirements established by Congress in the Immigration and Nationality Act (INA). To qualify for naturalization, an immigrant must be a lawful permanent resident

¹ ESA Program Briefing Book 2019 Annual Unduplicated Clients Served report for Refugee and Immigrant Assistance (RIA) unduplicated clients. This count includes clients served by the following ORIA programs: LEP Pathway, ORIA BFET and Naturalization Services.

(LPR) for five years², have good moral character and demonstrate knowledge of U.S. Civics and English by passing a written and oral exam.

Washington State law, RCW 74.08A.130 (**Appendix A**), requires DSHS to make an affirmative effort to identify and proactively contact legal immigrants receiving public assistance to facilitate their applications for naturalization. ORIA administers the Naturalization Services program statewide by contracting with community-based organizations (CBOs), nonprofit legal services organizations and refugee resettlement agencies recognized by the Office of Legal Access Programs (OLAP) in the U.S. Department of Justice (DOJ). In the past, the Board of Immigration Appeals (BIA) administered this recognition. In addition, ORIA collaborates and contracts with the City of Seattle to leverage state and local funds to expand naturalization services in King County.

Immigrants receiving public assistance are eligible for the Naturalization Services program if they meet the USCIS criteria to apply for U.S. citizenship and will be eligible to naturalize within a year of receiving naturalization services. Clients who enroll into the Naturalization Services program while on public assistance can continue to receive services even if their public assistance benefits end.

The Naturalization Services program provides specialized and culturally appropriate services that help clients become U.S. citizens. These services include intake eligibility screening, application assistance, preparing fee waiver requests, assistance in obtaining medical disability exemption for disabled and elderly clients medically unable to pass the exam, citizenship training and preparation classes, interview preparation and on-site interview assistance, appeals, and follow-up reporting to confirm enrolled clients have naturalized.

Outreach Participants

The Naturalization Services program prioritizes reaching out to people who may be in jeopardy of losing federally funded public benefits if they fail to naturalize or to those people who could gain access to federal benefits if they became U.S. citizens. Federal law stipulates that people who are refugees or humanitarian immigrants that experience a disability may receive federal Supplemental Security Income (SSI) benefits for a maximum of seven years. If after seven years, they fail to naturalize they are in jeopardy of losing federal benefits, and many become eligible to receive state-funded Aged, Blind, and Disabled (ABD) benefits. Other people who are lawful permanent residents may only be eligible to receive

² USCIS 'time in the U.S.' requirement varies among immigrants. Some may naturalize sooner than five years in the U.S.

federal SSI benefits if they become U.S. citizens. Therefore, providers give precedence to serve the following targeted group of “outreach” participants:

- People with refugee or humanitarian immigration status that arrived in the U.S. on or after August 22, 1996, who are currently receiving federal Supplemental Security Income (SSI) benefit and have not naturalized;
- People with refugee or humanitarian immigration status or lawful permanent residency (LPR) that are currently receiving state-funded Aged, Blind or Disabled (ABD) benefits; or
- People with refugee or humanitarian immigration status who are no longer eligible to receive SSI as a result of the seven-year time limit, which is removed once they become U.S. citizens.

Program Budget and Expenditures

For SFY 2019, the Washington State Legislature appropriated \$1,657,000 in general state funds (GF-S) for the Naturalization Services program. ORIA administers the total budget for this program via statewide contracts for the provision of services. See **Appendix B**. In SFY 2019, the Naturalization Services program expended \$1,651,175.

Program Outcomes

In SFY 2019, the Naturalization Services program served 3,197 unduplicated clients, an increase of 11% from the prior fiscal year. Out of those served, 618 (19%) identified as outreach participants and providers reported that 1,157 clients became naturalized U.S. citizens.

Upcoming Changes and Challenges in SFY 2020

During the 2019 legislative session, the Washington state Legislature increased funding for the DSHS Naturalization Services program by \$888,000 for SFY2020 and \$889,000 for SFY2021³. This investment of additional funding will help support the Naturalization Services providers as they respond to a significant number of changes to federal policies that will impact this program in the SFY 2020.

First, in the fall of 2019, the Department of Homeland Security, U.S. Citizenship and Immigration Services proposed changing the fee waiver application to exclude receipt of means-tested benefits as evidence of eligibility. This change will increase the documentation required by low

³ WA ESHB1109, p. 112

income applicants who are unable to pay the \$640 fee, including those eligible for DSHS Naturalization Services. It will also increase the time needed to complete the fee waiver applications by the Naturalization Services providers. This change went into effect in December 2019. USCIS is also proposing to lower the income standard for the fee waiver from 150% to 125% of the federal poverty line and eliminate the opportunity for applicants to apply for a reduced fee in the future. More Naturalization Services providers may need to use DSHS funding to assist low income immigrants in covering the cost of the application fee.

In addition, in June of 2019, the USCIS Seattle District Office shifted naturalization applications to Portland and Yakima to reduce the application backlog and expedite processing for naturalization interviews and oath ceremonies. However, this shift increased travel costs for both DSHS Naturalization Services program clients and providers as they navigate the new USCIS process.

BACKGROUND

Washington state has a large and dynamic immigrant community and is among the top refugee receiving states in the nation⁴. According to the 2017 American Community Survey, out of Washington's 2017 total estimated population of 7,169,967, approximately 13.8 percent (986,515) are foreign-born and 47.1 percent (464,628) of those are Naturalized U.S. citizens⁵.

Each year, the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS) naturalizes approximately 700,000 citizens during ceremonies across the U.S. and around the world. In FFY 2018, 756,481 people became U.S. citizens, including 14,045 people in Washington State⁶.

Naturalization is the hallmark of successful integration. Immigrants who naturalize receive the same rights as other citizens, including the right to vote and the ability to fully participate in civic engagement. Other benefits include full protection of the U.S. Constitution, freedom to travel abroad and eligibility for federal benefits such as Social Security benefits and Medicare. See **Appendix C** for basic information on becoming a U.S. citizen.

Since its creation in April 1997, ORIA's Naturalization Services program has provided specialized and culturally appropriate services assisting eligible immigrants to apply, prepare and naturalize in Washington State.

⁴ Refugee Processing Center: <http://www.wrapsnet.org/admissions-and-arrivals/>

⁵ U.S. Census Bureau, American Fact Finder:
https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

⁶ USCIS, Naturalization Data Set: <https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-form-n-400-application-naturalization>

In SFY 2019, ORIA provided Naturalization Services through 13 contracts statewide with community-based organizations (CBOs), nonprofit legal services organizations that specialize in immigration and refugee resettlement agencies, all of whom are recognized by the Office of Legal Access Programs (OLAP) in the U.S. Department of Justice (DOJ) (See **Appendix B**).

ORIA leverages existing community resources to maximize access to quality naturalization services. For example, ORIA contracts with the City of Seattle's Office of Immigrant and Refugee Affairs (OIRA) to leverage city funding for their New Citizens program, which has 12 providers. Through this partnership, ORIA supports a broader collaborative approach to offering services in King County. The City of Seattle's New Citizens program offers access to training and technical assistances to support any state-funded provider as well as training for citizenship teachers.

Success Story:

Mr. J has lived in the U.S. for 20 years. He has lived with advanced HIV that has caused physical and mental impairments to his daily living. A health care case manager assisted Mr. J to file his application for citizenship, but he did not understand the process of asking for a disability exception. When he went to his USCIS interview, the officer did not approve his case. He then contacted NWIRP to intervene. NWIRP was able to quickly work with his doctor to get the necessary paperwork for the disability exception. NWIRP also discovered that Mr. J had unpaid traffic fines, and was able to convince the court to allow him to do community service in lieu of paying the fines he could not afford. When USCIS subsequently erroneously denied Mr. J's application because of these fines, NWIRP helped him appeal. Almost a year later, Mr. J was finally approved and became a US citizen.

NW Immigrant Rights Project
(NWIRP)

All providers receiving ORIA funding are required to be DOJ recognized organizations with DOJ accredited individuals on staff and/or have access to a licensed immigration attorney. In SFY 2019, in an effort to build service capacity, ORIA continued to collaborate with the City of Seattle, King County, and OneAmerica to explore avenues to expand DOJ recognition and accreditation in Washington.

DSHS Naturalization Services providers have ties to ethnic communities and provide bilingual services in culturally sensitive ways to people seeking naturalization services. Many organizations hire and train bilingual staff who arrived as in the U.S. as immigrants and refugees. Citizenship classes are held in convenient community locations such as community colleges, neighborhood community centers, religious facilities and public housing multi-purpose rooms. Providers tailor classes to meet the needs of their participants, creating flexibility in the class times and locations, teaching techniques and accessibility.

In SFY 2019, ORIA contracted with Northwest Immigrant Rights Project (NWIRP) to provide legal consultation and training to its providers and to assist eligible participants with complex naturalization cases to become U.S. citizens.

ELIGIBLE POPULATION

Most legal immigrants, including refugees, must reside in the U.S. for five years before they are eligible to become citizens. There are some exceptions, such as immigrants who obtained permanent residency through marriage to a U.S. citizen who can apply after residing in the U.S. for three (3) years. Applicants who served in the U.S. armed forces during war may obtain citizenship without first becoming a permanent resident, if they were in the U.S. upon enlistment into the U.S. military.

Individuals are eligible to receive DSHS Naturalization Services if they are non-citizen, legal immigrants who:

- Are Washington state residents; and
- Are eighteen (18) years old or older; and
- Are recipients of Supplemental Security Income (SSI), or other Washington state administered state/federal funded cash, food, and medical assistance, or were receiving such benefits at the time the participant began receiving Naturalization Services; and
- Meet the eligibility criteria to apply for U.S. citizenship, including lawful permanent residence status; and
- Are eligible to naturalize or will be eligible to naturalize within one (1) year of receiving Naturalization Services.

Clients who enroll into the Naturalization Services program while on public assistance can continue to receive services even if their public assistance benefits end.

Outreach Participants

The DSHS Naturalization Services program prioritizes reaching out to people who may be in jeopardy of losing federally funded public benefits if they fail to naturalize or to those people who could gain access to federal benefits if they became U.S. citizens.

People with refugee or other humanitarian immigration status are only eligible to receive SSI for up to seven (7) years unless they naturalize. If they fail to become a U.S. citizen, they will lose their SSI cash benefits (a

monthly income of \$771 per eligible individual and \$1,157 per eligible couple). Once they lose SSI, they are eligible for the Washington state Aged Blind or Disabled (ABD) program, which is a monthly cash benefit of up to \$197 for a single individual or \$248 for a married couple. Naturalization allows SSI recipients to keep or regain their benefits, which is a higher monthly income and does not draw on state funds.

The DSHS Naturalization Services program identifies people with refugee or other humanitarian immigration status who receive federal SSI or state-funded ABD benefits as a target group and designates them as “Outreach” participants.

Outreach participants are:

- People with refugee or humanitarian immigration status who arrived in the U.S. on or after August 22, 1996, who are currently receiving SSI, and have not naturalized;
- People with refugee or humanitarian immigration status or lawful permanent residence (LPR) that are currently receiving ABD; or
- People with refugee or humanitarian immigration status that are no longer receiving SSI as a result of the seven-year time limit.

Success Story:

Ms. B came to the U.S. as an immigrant from Ethiopia in April 2012. She is a single mother with a child. She applied for public assistance at DSHS and was referred to Refugee & Immigrant Services NW (RISNW) for services. Ms. B. started receiving services through the LEP Pathway program. She faced many barriers, such as limited English skills, lack of work experience in the U.S., housing, transportation, networking, etc. Ms. B started attending ESL classes and was enrolled in the community job program. RISNW helped her apply for citizenship in 2017. With encouragement and hard work, she was determined to pass the test to become a U.S. citizen. She passed her naturalization interview in April 2019 and she was overjoyed with happiness. She now is more confident and becoming a U.S. citizen has truly changed her life.

Refugee & Immigrant Services NW

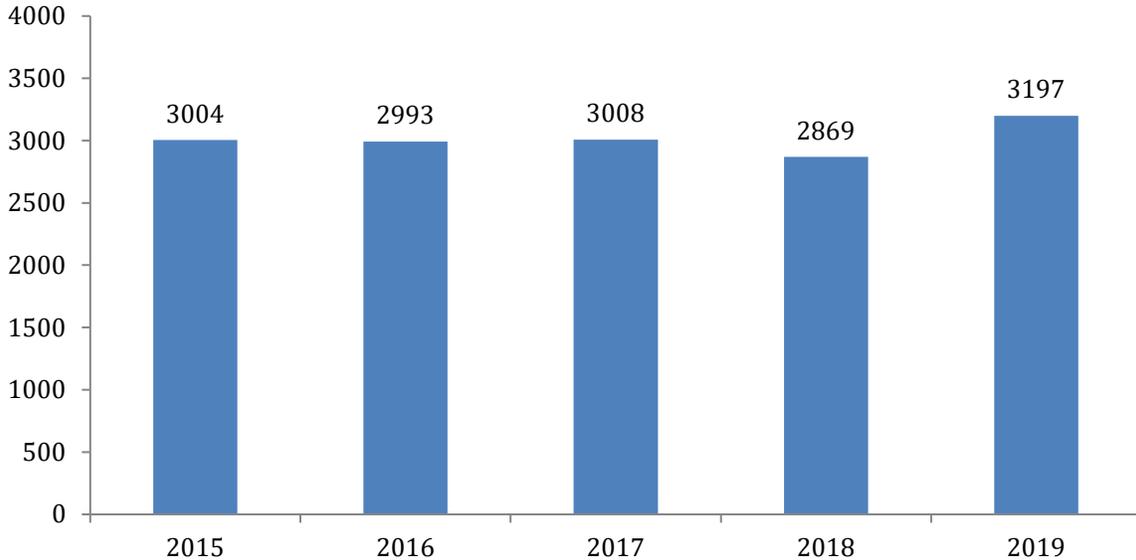
POPULATION SERVED

In SFY 2019, a total number of 3,197 participants received naturalization services, of which 1,639 (51%) arrived in the U.S. as refugees and 1,558 (49%) were non-refugee clients⁷. This reflects an 11% increase in the number of people seeking naturalization services from SFY 2018.

The following chart shows the number of Naturalization Services program participants from SFY 2015-2019:

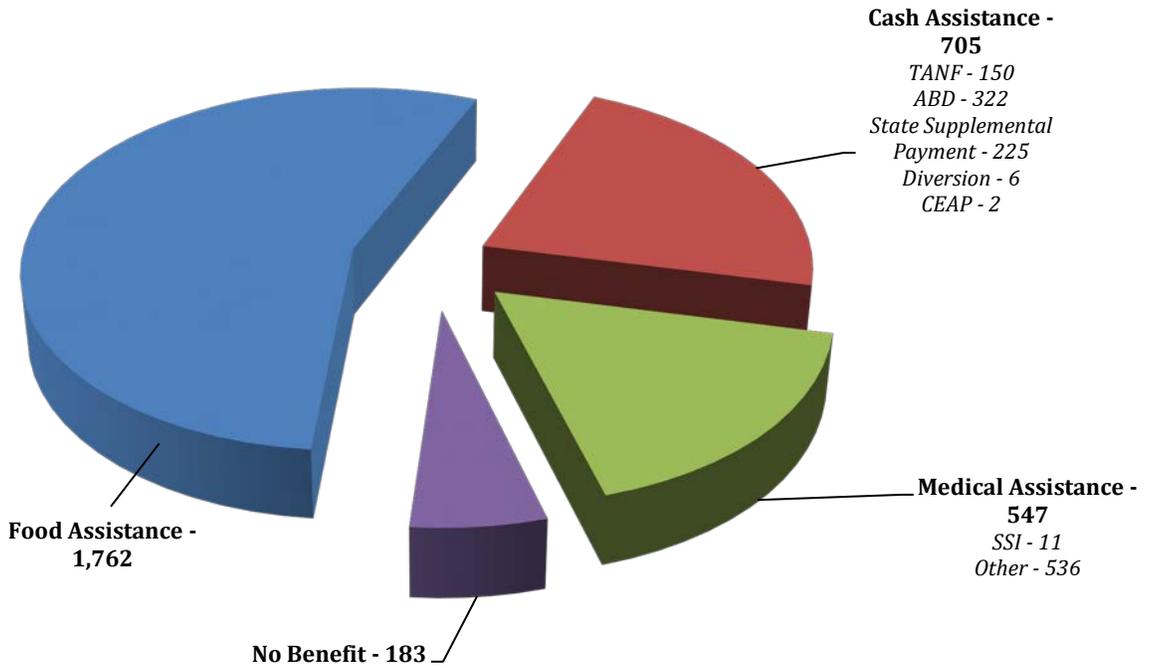
⁷ Data Source: RIA, ACES Database Warehouse as of 10/24/19.

Total Number of Participants in DSHS Naturalization Services SFY 2015-2019



The following chart shows the total number of unduplicated participants in SFY 2019 by their benefit type. If a client is in more than one public assistance program, DSHS uses the unduplicated client count based on program hierarchy: cash, food, and then medical.

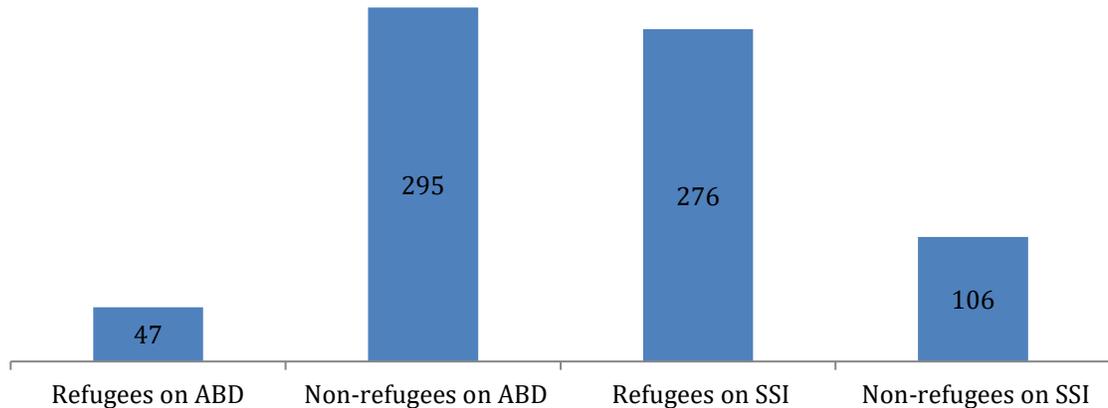
Number of Unduplicated Participants by Benefit Type in SFY 2019⁸



⁸ Data Source: RIA, ACES Database Warehouse as of 10/24/2019. 183 clients have no benefit. Clients who enroll into the Naturalization Services program while on public assistance can continue to receive services even if their public assistance benefits end.

The following chart shows the total 724 clients on ABD and SSI served in SFY 2019:

Number of Refugees/Non-Refugees on ABD/SSI in SFY 2019⁹



In SFY 2019, 618 individuals met the criteria that prioritized them as Outreach participants.

In addition, there were 106 lawful permanent residents (LPRs) receiving SSI who were not considered outreach participants because they will not lose their SSI if they fail to naturalize. LPRs are eligible for SSI if they have 40 federal credits of work in the U.S. and the 7-year rule does not apply to them. If LPRs entered the U.S. on or after August 22, 1996, then LPRs may not be eligible for SSI for the first five years as a lawfully admitted permanent resident, even if they have 40 credits of earnings.

SERVICES

In SFY 2019, DSHS contracted with Naturalization Service providers to offer the services listed below.

- Intake Screening – Establishing program and naturalization eligibility by interviewing and completing of the Intake Screening form as provided by ORIA for potential participants.
- Application Assistance – Assistance with completion and submittal of the USCIS Application for Naturalization (Form N-400) and the Request for Fee Waiver (Form I-912) to waive the N-400 and fingerprint fees. These forms are lengthy and difficult for many participants to complete.

⁹ Data Source: RIA, ACES Database Warehouse as of 10/24/2019.

- Training and Instruction – Citizenship preparation training and instruction includes classes in American History and civics and USCIS interview questions. English language training needed for the citizenship test may also be provided.
- Disability Waiver – Assistance with completion and submittal of the USCIS Medical Certification for Disability Exception (Form N-648) and assistance in obtaining other test exemptions when appropriate.
- Interview Preparation – Includes follow-up with participants and USCIS on the date/time for an interview; arrangement for interpreters, attorneys, and additional documents requested by USCIS; and additional sessions to practice pronunciation and diction.
- Interview Assistance – Assisting participants to apply for special accommodations during the interview process and/or being present on-site with participants during the interview to provide assistance and support.
- Fingerprint Fee Reimbursement – Reimbursement of the fingerprint fee for all participants age 75 years and under who do not meet USCIS criteria for fee waivers and have received a denial of eligibility of their waiver request from USCIS based on ineligibility.
- N-400 Fee Reimbursement – Reimbursement of the USCIS Form N-400 application processing fee when participant is ineligible for a fee waiver. This requires prior written approval by the DSHS ORIA program manager.
- Appeals – For Immigration Attorney/OLAP accredited representative to assist with a Request for a Hearing on a Decision in Naturalization Proceedings (USCIS Form N-336) to request a hearing before an immigration officer on the denial of the participant's USCIS N-400 Application.
- Naturalization Completion Follow-Up – Providers track and monitor the progress of the client's N-400 application with the U.S. Citizenship and Immigration Services (USCIS). They contact and follow-up with clients to confirm that they have been interviewed and/or have participated in the oath ceremony. ORIA requires providers to report the successful naturalization of a participant to ensure the quality of the services being provided. Contractors must provide the date of naturalization and one of the following naturalization verifications: copy of USCIS oath ceremony notice or valid US Passport, or naturalization certificate number.

This year, ORIA continued to provide expanded services through a partnership with the Northwest Immigrant Rights Project (NWIRP) on a project to build service provider capacity and support for serving those with complex immigration cases. These services include:

- Technical Assistance – Providing legal consultation to other DSHS Naturalization Services providers to determine the best way to assist participants to become naturalized U.S. Citizens
- Trainings – Developing and providing training and training materials specifically designed to help other DSHS Naturalization Services Providers develop an understanding of various naturalization topics and best ways to handle complex naturalization cases.
- Case Analysis – Conducting a comprehensive case analysis to determine whether the participant is eligible for representation for naturalization. A case analysis includes client interview, record request, legal research, criminal analysis, and follow up naturalization services with the participant if case is determined to be representable leading to successful naturalization.

Success Story:

Mr. N, a married man with two small children, immigrated to the U.S. in May 1998. In 2005, he applied for naturalization twice on his own, but was denied by USCIS. He lost hope of becoming a U.S. citizen so that he could apply for a janitorial position in a federal institution and help his children obtain citizenship. In November 2017, he went to Korean Women's Association (KWA) for the energy assistance program. While in the office, he met one of KWA's citizenship staff and learned that he qualified for the ORIA Naturalization Services program. He started attending citizenship classes and KWA helped file his application and fee waiver request in December 2017. In April 2019, he excitedly reported to KWA that he is now a U.S. citizen and was very appreciative of KWA's assistance. Mr. N is happy to be applying for U.S. passports for all his children, and he is also planning to apply for a federal job.

Korean Women's Association

Test Exemptions and Accommodations

Contracted staff assist applicants to apply for test exemptions and accommodations to ensure that they have the best support to successfully pass the naturalization test. The process to obtain exemptions and accommodations is often complex and lengthy thus, assistance from trained provider staff is vital to the successful completion of the naturalization process.

Common exemptions include:

- English and Civics Examination
There are two general exemptions: 50/20 (50 years of age and residing in the U.S. for at least 20 years) and 55/15 (55 years of age and residing in the U.S. for at least 15 years). Meeting either criterion means the applicant can waive the requirement to read and write a sentence correctly in English during the naturalization examination. The applicant still needs to take the American civics exam in English unless granted a waiver to take the same exam in the applicant's native language. The applicant is responsible to bring an interpreter to the interview if the civics exam is given in a language other than English.
- Medical Disability
A medical disability exemption waives the English and civics examination for qualified applicants. A licensed medical or osteopathic doctor or licensed clinical psychologist completes Form N-648 to verify the applicant's disability due to a physical or developmental disability or mental impairment that has lasted or will last 12 months or longer. DSHS contractors have reported an increase in denials from the USCIS and have been meeting to strategize on appropriate strategies to address this concern.

Common accommodations include:

- Disability
USCIS has an obligation under federal law and policy to provide accommodations for physical and mental impairments that make it difficult for applicants to complete the naturalization process, including the examination.
- Age 65 and Older
In some cases, applicants who are 65 years of age and older and have resided in the U.S. for 20 years or more may be given a shortened version of the naturalization civics examination in the applicant's native language. This waiver does not require the applicant to be disabled.

Success Story:

Mrs. J was a LPR for 22 years and applied for naturalization based on her disability waiver. First time she attended her interview, the U.S. Citizenship and Immigration Service (USCIS) denied her disability exception (N-648) form, which did not meet their standard. She struggled to find another doctor that could help her fill out her N-648 form. Lutheran Community Services NW provided Mrs. J with a list of local practitioners. One day before her second interview, she saw a new doctor who completed her N-648 form properly. USCIS approved her disability exception and she passed her interview. Mrs. J came back to LCSNW's office in tears holding her naturalization certificate and thanked LCSNW staff for all their help.

Lutheran Community Services NW

Outreach Participants

Providers prioritize services and pay special attention to address unique needs in the outreach target population. For example, elderly refugees may suffer from age related memory loss, lack of concentration and may have difficulty learning a new language. They often require more class time to practice and study before they can successfully pass the naturalization test. Contractors can also assist individuals who are currently receiving ABD or SSI to waive English language proficiency requirements based on age and length of lawful permanent resident status requirements for naturalization. Additionally, some contractors are able to provide tutoring for homebound outreach participants.

Naturalization Completion Reporting

The goal of the Naturalization Services program is to assist people in becoming naturalized US citizens. Contracted staff assist clients throughout the naturalization process, from application completion and submission to responding to requests for additional information and being present on-site at USCIS offices during a client's formal interview. Contracted service providers must monitor and track their caseloads on a regular basis to ensure that clients successfully naturalize. This requires regular follow-up and outreach to clients after the submission of the application over an extended period of time.

Contractors are reimbursed based on payment points for work from application submission to follow-up services, including reporting of successful naturalization. By reporting naturalization completions to ORIA, contractors are confirming that they have successfully assisted eligible refugees and immigrants in becoming U.S. Citizens. After naturalization, contractors may also assist clients with their voter registration and notification of naturalization to all necessary agencies such as the Social Security Administration.

In SFY 2019, USCIS reported that the processing time for the N-400 (citizenship) applications in the Seattle Field Office was approximately 16 - 20 months, which is twice the length of time as in prior years. ORIA continues to work with providers to monitor and evaluate the impact of processing times on the Naturalization Services program.

PROGRAM FUNDING

The DSHS Naturalization Services program is supported solely through general state funds (GF-S). Since 2012, the Washington State Legislature has appropriated \$1,657,000 for services. In the past year, providers reported an increase in the need for naturalization services, as many people

in our communities are eager for the protections and opportunities afforded through naturalization. To address the need for services, providers leverage state dollars with other funding resources, such as grants from USCIS. Regardless of the varied funding streams, providers report waiting lists for their services.

In 2019, the Washington state Legislature increased ORIA’s naturalization funding by \$880,000 for SFY20 and \$889,000 for SFY21. This increase illustrates Washington state’s commitment to the critical role naturalization plays in successful integration into life in the U.S. In anticipation of developing a program funding plan for SFY20 and SFY21, ORIA met with naturalization service providers to identify how best to invest the additional funds to better serve Washington residents interested in obtaining U.S. citizenship.

In SFY 2019, the Naturalization program expended \$1,651,175. The following chart shows total program disbursement for SFY 2015-2019:

State Fiscal Year	Total Budget	Total Distribution	Balance
2015	\$1,657,000	\$1,634,792	\$22,208
2016	\$1,657,000	\$1,649,362	\$7,638
2017	\$1,657,000	\$1,646,184	\$10,816
2018	\$1,657,000	\$1,657,000	\$0
2019	\$1,657,000	\$1,651,175	\$5,825

PROGRAM DISBURSEMENTS

The Naturalization Services program contracts follow a state fiscal year schedule (July 1 to June 30). In SFY 2019, contractors entered into a performance-based contract structured on services provided and naturalization completions. This contracting model meets performance based outcome criteria for contracting required under previous Governor Executive Order 10-07, *Performance Based Contracting*. Under the 80/20 contract model, contractors receive up to 80% of their contracted amount by billing for specific service payment points and may earn the remaining 20% by achieving their individually negotiated naturalization completion annual performance outcome goals.

Contractors have a menu of services they are allowed to provide in order to offer flexibility on how they determine services and spend their contracted

amount under the 80/20 model. Contractors submit invoices for naturalization services on a monthly basis and submit billings up to 30 days after each month of service. ORIA permits the submission of an additional final invoice after their June submission in order to close out the program service year. DSHS has 30 days from the date of receipt and approval of each invoice to process and make payment.

This chart shows SFY 2019 program expenditures by service type:

Program Expenditures, SFY 2019

Service	Expenditures	Expenditure Percentages
Application Assistance	\$913,292	55.1%
USCIS Fingerprint Fee	\$0	0.0%
USCIS N-400 Application Fee	\$1,280	0.1%
Disability Exception Assistance - USCIS N648 Form	\$82,770	5.0%
Citizenship Training Hours	\$164,783	10.0%
Appeals	\$500	0.0%
Interview Preparation	\$78,600	4.7%
Interview Assistance	\$35,100	2.1%
Annual Performance Outcome Goal Achievement	\$324,850	19.6%
Specialized Naturalization Services (Specialized Project)	\$40,000	2.4%
Annual Performance Outcome Goal Achievement (Specialized Project)	\$10,000	0.6%
Total	\$1,651,175	99.6%

PROGRAM OUTCOMES

In SFY 2019, the Naturalization program had:

- 3,197 unduplicated clients receive Naturalization services, of which 618 (19%) were Outreach participants.

- 1,157 Naturalization completions reported for the total unduplicated caseload.

Although the main performance outcome goal for this program is completed naturalizations, given the challenges and complexities of this process for many of the clients, the program also tracks specific activities associated with the naturalization process as outcomes and payment points for billings.

The following reflects reported payment points outcome data for SFY 2019, with a four-year look-back:

SFY 2015-2019 Outcomes

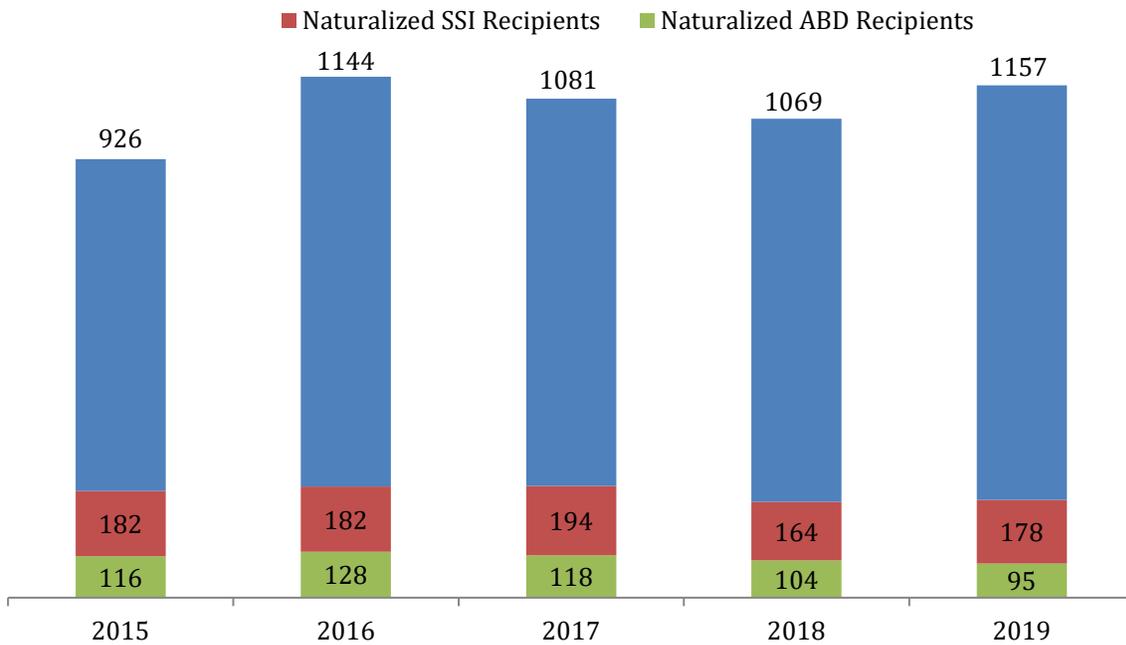
Service	2015	2016	2017	2018	2019 ¹⁰
Application Assistance	1,580	1,599	1,700	1,658	1,706
USCIS Fingerprint Fee	0	0	0	0	0
USCIS N-400 Application Fee	0	0	0	0	2
Disability Exception Assistance - USCIS N648 Form	253	235	233	305	309
Citizenship Training Hours	25,490 Hours	18,069 Hours	16,771 Hours	19,964 Hours	18,855 Hours
Naturalization Completion Follow-up	926	1,144	1,082	1,069	1,157
Appeals	5	2	1	5	2
Interview Preparation	532	505	426	448	801
Interview Assistance	129	270	197	191	361
Technical Assistance (Specialized Project)	n/a	n/a	n/a	94	123
Case Analysis (Specialized Project)	n/a	n/a	n/a	18 ¹¹	33
Trainings to other DSHS Providers (Specialized Project)	n/a	n/a	n/a	2	2

¹⁰ Data Source: RIA, ACES Database Warehouse as of 10/24/2019.

¹¹ Naturalization Completion was not a part of the Specialized Naturalization Services Project's performance outcome goal in SFY 2018 because the USCIS processing time has averaged approximately 16 – 18 months for naturalization applications with non-complex cases.

The following chart shows the number of clients who have been granted U.S. citizenship status through the naturalization process from SFY 2015-2019, with breakout counts for SSI and ABD recipients who have naturalized:

Total Number of Naturalized Participants, SFY 2015-2019¹²



The actual number of naturalized individuals is likely higher than captured here, because participants may neglect to report their naturalization to service contractors. Failure to report a change in status may be due to a number of factors such as multiple attempts before a successful naturalization, relocation during the process and naturalizing on their own after receiving services through a contractor.

BARRIERS TO NATURALIZATION

The application process for naturalizing is complicated and even a simple mistake can delay processing. It is also costly. The current naturalization fee is \$725 per person, which includes the application fee and a mandatory fingerprint fee. Low-income applicants often find the cost for professional assistance combined with the naturalization fees prohibitive, and without DSHS’s free Naturalization Services program, many may not attempt to apply to naturalize.

¹² Data Source: RIA, ACES Database Warehouse as of 10/24/2019.

The high cost of application fees can be a barrier to individuals applying for citizenship. However, USCIS currently waives this fee for low-income applicants such as those on public assistance. Contractors are required to assist participants to submit a fee waiver request and help them gather the documentation they need to support their request. In SFY 2019, contractors reported helping participants submit 1,706 fee waiver requests to USCIS. While there is great benefit in seeking waivers, filing waiver requests is a significant workload for both the service provider and the applicant. Submitting a fee waiver request will generally increase the processing time by about two months.

The naturalization examination was revised in 2013 from a simpler civics test to a deeper exploration of U.S. government structure, American history and geography. To pass the test, applicants must have a more detailed understanding of U.S. political and historical concepts. For example, the examination tests the applicant's understanding of how the federalist papers included the ratification of the U.S. Constitution. Service providers have incorporated more rigorous curriculum into their naturalization classes.

DSHS and service providers are working to mitigate barriers to the naturalization process by helping participants overcome anxieties and barriers including:

- Age-related memory problems and their impact on learning civics and history
- Inability to speak English under the pressure of the citizenship interview
- Citizenship classes tailored for “everyone” regardless of English capabilities
- Difficulty in obtaining test exemptions and/or accommodations
- High costs related to the naturalization process: \$640 application fee and \$85 mandatory fingerprint fee

Another barrier in the naturalization process relates to Medical Disability Waivers (N-648). Over the last couple of years, DSHS contractors have been experiencing an increased level of disability waiver denials by USCIS. A disability waiver allows disabled clients, particularly those with mental health issues, to either take a simplified citizenship test or have the test waived. The “spike” in denials is not unique to our state and both the federal Office of Refugee Resettlement and the USCIS recognizes this issue and have previously organized discussions on this topic. The concern is that

USCIS requires medical documentation to support the disability request and USCIS agents, who are not medically trained, are overriding the medical evidence based on their own perception of the client's disability.

ORIA collaborates with the City of Seattle's Office of Immigrant and Refugee Affairs (OIRA) to coordinate and address with the USCIS the struggles that many contractors face in obtaining an approval of the N-648 Disability Exception Requests for clients. The rejection of the N-648s greatly affects the increased time contractors need to spend to resubmit applications, and denials of N-648s may result in some refugee clients losing SSI benefits for failure to naturalize within the seven-year federal timeline. To improve their performance, USCIS is training immigration officers to handle disability waiver requests, and offering more trainings to stakeholders on the disability waiver requirements to improve the ways that medical experts are completing the documentation.

The Department recognizes the service providers who contract with DSHS as playing a key role in identifying issues, strategies and solutions to help address barriers to naturalization. ORIA hosted stakeholder meetings throughout the SFY 2019 program year to discuss outreach to clients, program successes and challenges and contracting structure. The intent is to work together to modify the program to improve the quality and effectiveness of the naturalization program.

APPENDIX A

RCW 74.08A.130

Immigrants - Naturalization facilitation.

The department shall make an affirmative effort to identify and proactively contact legal immigrants receiving public assistance to facilitate their applications for naturalization. The department shall obtain a complete list of legal immigrants in Washington who are receiving correspondence regarding their eligibility from the social security administration. The department shall inform immigrants regarding how citizenship may be attained. In order to facilitate the citizenship process, the department shall coordinate and contract, to the extent necessary, with existing public and private resources and shall, within available funds, ensure that those immigrants who qualify to apply for naturalization are referred to or otherwise offered classes. The department shall assist eligible immigrants in obtaining appropriate test exemptions, and other exemptions in the naturalization process, to the extent permitted under federal law.

APPENDIX B

SFY 2019 NATURALIZATION CONTRACTS

Contractor	Contract Amount
REGION 1	
La Casa Hogar	\$ 72,000
World Relief – Spokane	\$ 200,000
World Relief – Tri Cities	<u>\$ 95,000</u>
Region 1 Total	\$ 367,000
REGION 2	
City of Seattle	\$ 425,000
International Rescue Committee	\$ 64,600
Refugee & Immigrant Services NW	\$ 170,000
Refugee Federation Service Center	\$ 99,800
Ukrainian Community Center of WA	<u>\$ 55,000</u>
Region 2 Total	\$ 814,400
REGION 3	
Korean Women’s Association	\$ 141,600
Lutheran Community Services NW (Clark & King Counties)	\$ 189,000
Multicultural Self-Sufficiency Movement	\$ 45,000
Tacoma Community House	<u>\$ 50,000</u>
Region 3 Total	\$ 425,600
STATEWIDE	
NW Immigrant Rights Project (Specialized Project)	<u>\$ 50,000</u>
Statewide Total	\$ 50,000
TOTAL CONTRACT AMOUNT	\$1,657,000

APPENDIX C

BASIC INFORMATION ON BECOMING A UNITED STATES CITIZEN

Who is eligible?

Lawful permanent residents (LPR) who have resided in the U.S. for five years (three years if married to a U.S. citizen). LPR status is indicated on the applicant's USCIS I-551 Permanent Resident Card (also known as a "green card"). Refugees are eligible to apply for LPR status one year after arriving in the U.S.

Requirements to apply for citizenship - Applicant must:

- Be at least 18 years old;
- Have been present in the U.S. as a Permanent Resident for at least half of the 5 years (three years if married to a U.S. citizen);
- Be able to pass a test on speaking, understanding, reading and writing basic English;
- Be able to pass a U.S. history and government test;
- Have good moral character;
- Understand and accept the oath of allegiance to the U.S.; and
- Not have a citizenship-related legal problem.

Exceptions in the testing requirements

For applicants that meet certain age and time in the U.S. criteria, the USCIS makes exceptions to the testing procedures. This may include allowing the applicant to bring an interpreter for the English test, or asking the applicant 10 history and U.S. government questions instead of 20. For applicants who meet the USCIS criteria for disability, both tests are waived.

What is the process?

If the applicant meets all the eligibility requirements, he or she may file a USCIS Application for Naturalization form with required photos and a money order or check for the application fee (\$640) and fingerprint fee (\$85) to the USCIS. The process takes approximately 16 - 20 months from the date of the application to date of interview with USCIS.

Are there any resources available to help?

There are community based organizations in the state that provide services to eligible applicants including assistance in completing the citizenship

application and disability waiver requests, providing applicants with the USCIS fees, or assisting them to request the USCIS to waive the fees for low income families. These agencies also provide citizenship preparation classes.

What are the benefits?

Many SSI clients that have not naturalized or cannot show they have 40 work quarters will lose their SSI benefits when they reach their 7-year time limit. By becoming citizens, they can maintain their benefits and become eligible for a full range of other public benefits. Citizens can apply for more family members to immigrate to the U.S. and often more quickly than lawful permanent residents. Children, who are under 18 and live at home at the time one or both of their parents naturalizes, automatically become U.S. citizens. Citizens can vote, can travel abroad without worrying about re-entry permits, are protected from deportation and can apply for certain government jobs.