

## REPORT TO THE LEGISLATURE

### Naturalization Services

Chapter 297, Laws of 2022 (ESSB 5693 Section 205 (4))

January 1, 2023

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## EXECUTIVE SUMMARY

Chapter 297, Laws of 2022 (ESSB 5693 Section 205 (4)) requires the Department of Social and Health Services to report to the Legislature annually on 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) 2022 (July 1, 2021 – June 30, 2022).

### 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 over \$30 million in federal and state dollars to support comprehensive services for refugees and immigrants living in Washington state. Through a network of community-based providers, ORIA delivers services that provide individuals and families with resources they need to rebuild their lives, from their arrival in Washington to becoming naturalized U.S. citizens. More than 70 providers serve approximately 11,000 individuals annually.

These services are comprised of 14 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. Included within these core areas are employment assistance, English as a Second Language (ESL) instruction, comprehensive case management, self-sufficiency education, refugee health screenings, health case management, behavioral health services, unaccompanied refugee minor foster care, youth educational activities, elder services, technology access and digital inclusion, ORIA's naturalization program, and other services as well.

U.S. citizenship is a critical component of civic participation and integration into the community. The Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS) authorizes U.S. citizenship to legal immigrants after they fulfill the requirements established by Congress in the Immigration and Nationality Act (INA). To qualify for naturalization, an immigrant must be a legal permanent resident (LPR) for five years<sup>1</sup>, have good moral character, and demonstrate knowledge of U.S. Civics and English by passing a written and oral exam.

[RCW 74.08A.130](#) 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, nonprofit legal services organizations and refugee resettlement agencies recognized by the Office of Legal Access Programs (OLAP) within the U.S. Department of Justice. In addition, ORIA collaborates and

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<sup>1</sup> USCIS 'time in the U.S.' requirement varies among immigrants. Some may naturalize sooner than five years in the U.S.

contracts with the City of Seattle to leverage state and local funds to expand the reach of naturalization services in King County.

Immigrants receiving public assistance are eligible for the Naturalization Services Program if they meet 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 eligibility screening, application assistance, preparing fee waiver requests, assistance obtaining medical disability exemptions 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 to confirm enrolled clients have naturalized.

With an increase in state funding in SFY 2020, ORIA expanded services to help participants apply for Certificates of Citizenship for their children, increase language access, and mitigate barriers, such as transportation cost to naturalization interviews when USCIS shifted appointments from their Seattle-based office to the Portland and Yakima field offices. These services continued throughout SFY 2022.

In addition, during the first quarter of SFY 2022, ORIA's service providers continued to assist clients with remote access and survival services. ORIA allowed these expanded naturalization services through September 30, 2021, in order to meet the ongoing needs of participants affected by COVID-19. These services included outreach and needs assessment, information and referral, connections to emergency and basic needs services, online education, and client engagement.

### **Outreach Participants**

The Naturalization Services Program prioritizes outreach to people who may be in jeopardy of losing federally funded public benefits if they fail to naturalize, and to people who could gain access to federal benefits if they became U.S. citizens. Federal law stipulates that people with refugee or humanitarian immigration status<sup>2</sup> 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 may 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 federal SSI benefits if they become U.S. citizens. Therefore, providers give priority for service to the following targeted group of "outreach" participants:

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<sup>2</sup> A noncitizen may be eligible to receive SSI if they are a refugee, an asylee, a noncitizen with deportation or removal withheld, an Amerasian immigrant, or a Cuban or Haitian entrant.

- People with refugee or humanitarian immigration status that arrived in the U.S. on or after August 22, 1996, who are currently receiving federal SSI benefits and have not naturalized;
- People with refugee or humanitarian immigration status or lawful permanent residency (LPR) that are currently receiving state-funded ABD benefits; and
- 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**

In SFY 2022, the Washington State Legislature appropriated \$2,545,000 in general state funds (GF-S) for the Naturalization Services Program. During the reporting period, ORIA expended \$2,234,261 through its 14 contracted providers.

## **Program Outcomes**

In SFY 2022, the Naturalization Services Program served 3,831 unduplicated clients. Out of those served, the program served 594 (16%) outreach participants, and 1,278 became naturalized U.S. citizens.

## **Changes and Challenges**

The COVID-19 pandemic continued to play a role in reducing service providers' ability to assist individuals seeking to naturalize, particularly in the early months of SFY 2022. Many agencies, including the local USCIS office, opened offices with limited capacity. This resulted in barriers for many clients as they tried to access limited or remote services, which resulted in reduced opportunities to naturalize.

During SFY 2022, the USCIS Seattle District Office continued to send certain applicants to Portland and Yakima to reduce application backlog and expedite the naturalization process. Those who had to travel for their interviews and oath ceremonies faced an additional economic burden, to include travel and lodging costs, frequently on more than one trip. ORIA responded by allowing service providers to cover transportation costs for their staff and applicants required to travel to complete their naturalization process.

In SFY 2022, ORIA offered our service providers an opportunity to attend the Catholic Legal Immigration Network, Inc. (CLINIC) convening that brought together legal practitioners, advocates, and nonprofit leaders from across the country to network and gain insight about the current state of immigration law. The CLINIC Convening is the premier national conference providing comprehensive education on immigration law, program management, networking and advocacy.

In SFY 2022, many service providers experienced a higher than usual employee turnover, requiring ORIA to provide more technical assistance and training to support new staff members.

## BACKGROUND

Washington has a large and dynamic immigrant community and is among the top refugee receiving states in the nation<sup>3</sup>. According to the 2021 American Community Survey, approximately 15.1% of Washington's 2021 total estimated population (1,143,311) are foreign-born and 49% (560,282) of those are naturalized U.S. citizens<sup>4</sup>.

Each year, USCIS naturalizes approximately 800,000 citizens during ceremonies across the U.S. and around the world. In FFY 2021, 809,388 people became U.S. citizens, including 17,388 in Washington state<sup>5</sup>.

Naturalization is a 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 and Medicare. See **Appendix A** for 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 to assist eligible immigrants to apply, prepare and naturalize in Washington state.

In SFY 2022, ORIA provided Naturalization Services through 14 contracts statewide with community-based organizations, nonprofit legal services organizations that specialize in immigration, and refugee resettlement agencies, all of whom are recognized by OLAP (See **Appendix B**).

### Participant Success Story

Lutheran Community Services NW represented Vera, a 95-year old refugee from Moldova who lost her Social Security Income (SSI) disability grant in 2021 when she failed to become a U.S. citizen. Refugees are required by federal law to naturalize within seven years or risk losing SSI disability. Vera had a disability waiver on file, and could only understand limited questions, even when translated into her native language. She lacked literacy skills, and struggled to sign documents. She had no US citizen relatives who could be designated as representatives if USCIS recognized her as incapable of answering questions. The LCSNW Naturalization case worker assisted her during the 90 minute interview. In the end, Vera passed and became a U.S. citizen. She is now back on SSI benefits.

Lutheran Community Services NW  
(LCSNW)

<sup>3</sup> Refugee Processing Center: <http://www.wrapsnet.org/admissions-and-arrivals/>

<sup>4</sup> U.S. Census Bureau, American Fact Finder: <https://data.census.gov/cedsci/table?q=0400000US53&d=ACS%201-Year%20Estimates%20Data%20Profiles&tid=ACSDP1Y2021.DP02>

<sup>5</sup> USCIS, Naturalization Data Set: <https://www.uscis.gov/tools/reports-and-studies/immigration-and-citizenship-data>

ORIA leverages existing community resources to maximize access to naturalization services through its contract with the City of Seattle's Office of Immigrant and Refugee Affairs New Citizens Program, which contracts with 12 naturalization providers. Through this partnership, ORIA supports a broader collaborative approach to offering services in King County and offers an expanded menu of training and technical assistance for immigration staff and citizenship instructors.

Organizations contracted to provide ORIA naturalization services are required to be recognized by the Department of Justice (DOJ) with either DOJ accredited individuals on staff and/or access to a licensed immigration attorney. In SFY 2022, to build service capacity, ORIA continued to collaborate with the City of Seattle and OneAmerica to explore avenues to expand DOJ recognition and accreditation in Washington.

ORIA's naturalization services providers have ties to ethnic communities and provide bilingual services in culturally appropriate ways to people seeking naturalization services. Many organizations hire and train bilingual staff who arrived in the U.S. as immigrants and refugees themselves and are personally familiar with the process. Citizenship classes are held in convenient community locations, such as community colleges, neighborhood community centers, faith-based facilities and public housing multi-purpose rooms. Providers tailor classes to meet the needs of participants, creating flexibility in the class times and locations, teaching techniques, and accessibility.

In SFY 2022, ORIA continued to contract with Northwest Immigrant Rights Project (NWIRP) to provide legal consultation and training to ORIA naturalization service providers and to assist eligible participants with complex naturalization cases and barriers to naturalization.

## **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. These individuals can apply after residing in the U.S. for three 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 for the Naturalization Services Program if they are non-citizen, legal immigrants who:

- Are Washington state residents;
- Are 18 years old or older;

- Are recipients of SSI, 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;
- 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 year of receiving Naturalization Services.

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

### 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.

People with refugee or other humanitarian immigration status are only eligible to receive SSI for up to seven years unless they naturalize. If they fail to become U.S. citizens, they are in jeopardy of losing their SSI cash benefits, which in 2022 was a maximum monthly benefit of \$841 per eligible individual and \$1,261 per eligible couple.

Naturalization allows SSI recipients to keep or regain their federal benefits, which is a higher monthly benefit than state-funded ABD.<sup>6</sup> It also avoids the need to draw on state funds for the alternative ABD benefits. The 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;

#### Participant Success Story

Born in Pakistan as a member of a religious minority - the Ahmadiyya community – Fouz experienced various forms of religious persecution and discrimination. She and her family had to flee her country in search of freedom and a better future for her children. She came to the US and rebuilt her life, but she wasn't sure how to become a citizen to fully participate in the civic life of her new home. RISNW assisted Fouz through the naturalization journey, including addressing barriers. She naturalized in June 2022. Her children are now in college, and Fouz and her family recently purchased their first house .

Refugee & Immigrant Services NW  
(RISNW)

<sup>6</sup> If a client loses SSI, they may be eligible for Washington's ABD program, which in SFY 2022 provided a maximum monthly cash benefit of \$197 for a single individual or \$248 for a married couple, and a referral to the Housing and Essential Needs (HEN) Program.



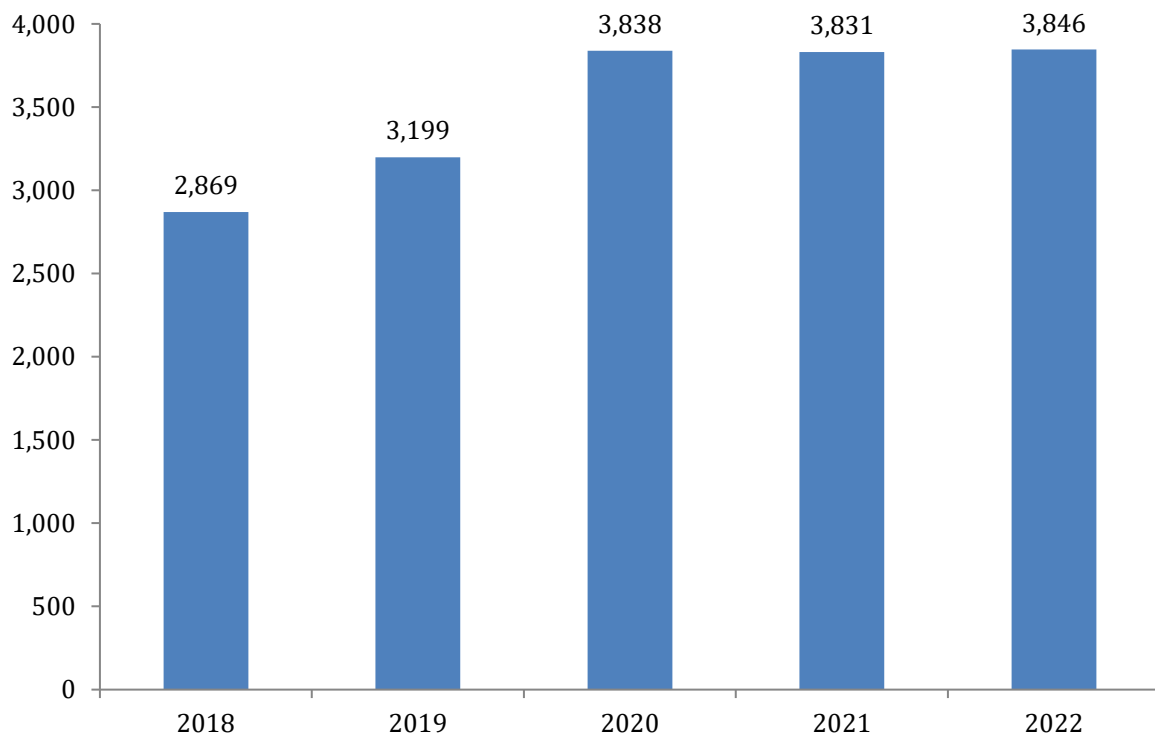
- People with refugee or humanitarian immigration status or lawful permanent residence (LPR) that are currently receiving ABD; or
- People with refugee or humanitarian immigration status that are no longer receiving SSI as a result of the seven-year time limit.

## POPULATION SERVED

In SFY 2022, 3,846 participants received naturalization services, of which 2,371 (62%) arrived in the U.S. as refugees and 1,475 (38%) were non-refugees clients<sup>7</sup>.

This chart shows the number of participants from SFY 2018-2022:

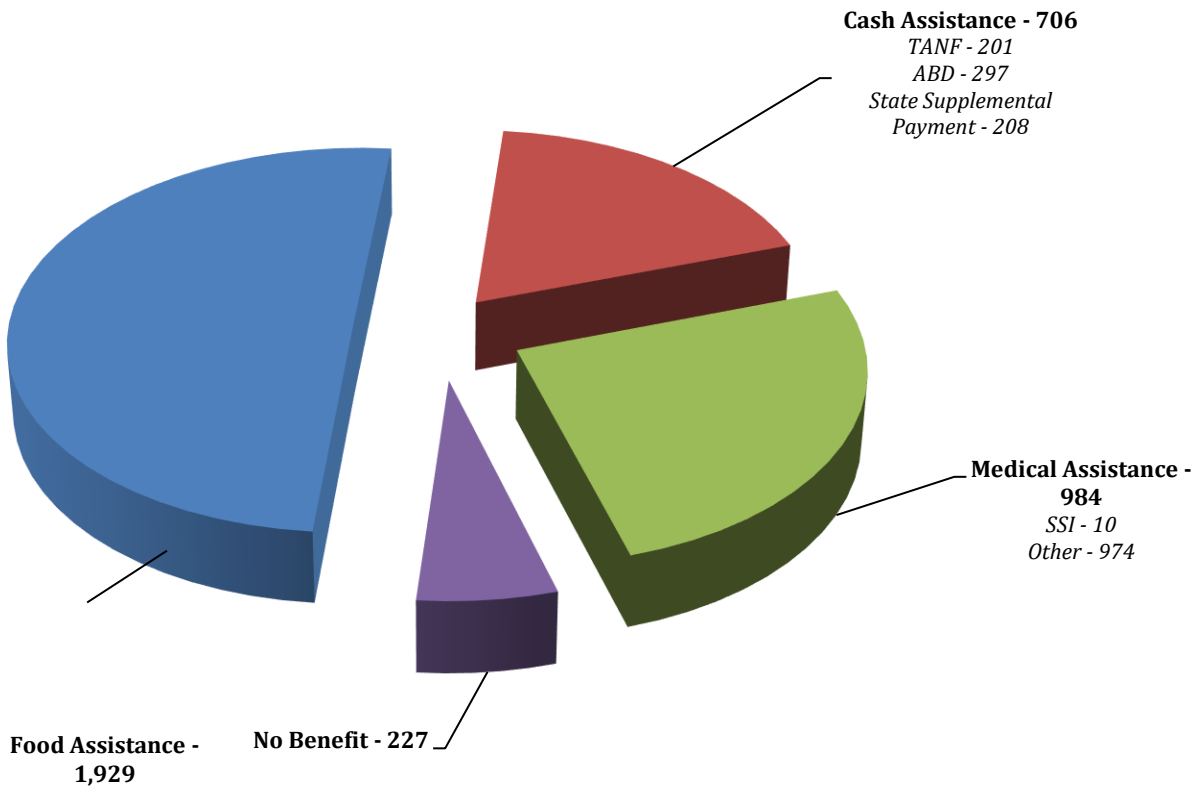
**Total Number of Participants in DSHS Naturalization Services Program  
SFY 2018-2022**



The chart below shows the total number of unduplicated participants in SFY 2022 by benefit type. If a client receives more than one form of public assistance, DSHS uses the unduplicated client count based on the following benefit type hierarchy: cash, food, and then medical.

<sup>7</sup> Data Source: RIA, ACES Database Warehouse as of 10/14/2022.

## Number of Unduplicated Participants by Benefit Type in SFY 2022<sup>8</sup>



## Number of Refugees/Non-Refugees on ABD/SSI in SFY 2022<sup>9</sup>

In SFY 2022, 594 individuals met criteria that prioritized them as Outreach participants. In addition, 60 LPRs receiving SSI were not considered outreach participants because they were not in danger of losing SSI if they failed to naturalize. LPRs are eligible for SSI if they have 40 federal credits of work in the U.S. and are not subject to the seven-year rule. If LPRs entered the U.S. on or after August 22, 1996, they may not be eligible for SSI for the first five years, even if they have 40 credits of earnings.

## SERVICES

In SFY 2022, DSHS contracted with statewide providers to offer the following Naturalization Services.

<sup>8</sup> Data Source: RIA, ACES Database Warehouse as of 10/14/22. Clients who enroll in the Naturalization Services Program while on public assistance can continue to receive services even if their public assistance benefits end.

<sup>9</sup> Data Source: RIA, ACES Database Warehouse as of 10/14/2022.

- Intake Screening – Establishing program and naturalization eligibility by interviewing and completing the Intake Screening form as provided by ORIA for potential participants.
- Assistance with the N-400 Application – Assistance with completion and submittal of the USCIS Application for Naturalization (Form N-400). This form is complex, lengthy, and difficult for many participants to complete.
- Assistance with the I-912 Fee Waiver Request – Assistance with completion and submittal of the USCIS Fee Waiver Request (Form I-912) to waive N-400 or N-600 fees.
- Citizenship Training and Instruction – Citizenship preparation training and instruction which includes classes in American History and civics, USCIS interview questions, and civics-related English language training.
- Disability Exception Request – 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 – Follow-up with participants and USCIS on the date/time for an interview; arrangement for interpreters, attorneys, and additional documents requested by USCIS; and sessions to practice pronunciation and diction.
- Interview Assistance – Assistance applying for special accommodations during the interview process and being on-site with participants during the interview for support.
- N-400 Fee Reimbursement – Reimbursement of the USCIS Form N-400 application-processing fee when participant is ineligible for a fee waiver.
- 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.
- 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 – Tracking and monitoring progress of the client's N-400 application with USCIS. Providers follow-up with clients to confirm 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.

- N-600 Assistance – Assistance with completion and submittal of the USCIS Application for Certificate of Citizenship form (N-600 form) for a program participant's child after naturalization completion through the ORIA Naturalization Services Program.
- N-600 Fee Reimbursement – Reimbursement of the USCIS Form N-600 processing fee when participant is ineligible for a fee waiver.
- N-600 Completion Reporting – Reporting N-600 completion to ORIA when Certificate of Citizenship is received for naturalized participant's child.
- Translation and Notary Services Cost Reimbursement for N-600 – Reimbursement of cost to procure translation and notary services for supporting documents when submitting N-600 to USCIS.
- Interpreter Services Cost Reimbursement for N-648 Medical Appointments – Reimbursement of cost to procure DSHS certified/qualified medical interpreter for N-648 medical appointments if a medical provider is not able to secure a qualifying interpreter for participant.
- Naturalization Workshops – Planning and conducting one-day naturalization workshops in remote locations.
- FOIA Request Fee Reimbursement – Reimbursement of the Freedom of Information Act (FOIA) request fee when a contractor makes a request for a participant to determine whether applying for naturalization would be appropriate.
- I-942 Reduced Fee Request – Assistance with completion and submittal of the USCIS Reduced Fee Request (Form I-942) to reduce the N-400 fee.
- Transportation Cost Reimbursement – Reimbursement for mileage traveled as a contractor and program participant for attending an interview and/or oath ceremony when scheduled outside of USCIS's regular service facility.

ORIA continues to partner with the Northwest Immigrant Rights Project (NWIRP) to expand service provider capacity and to support legal services for individuals 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.

- Provider Trainings – Developing and providing training and materials specifically designed to help 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 the case is determined to be representable leading to successful naturalization.
- Naturalization Completion – Reporting completion of naturalization for represented case analysis participants in the program.

During the first quarter of SFY 2022, ORIA providers continued to offer expanded COVID-19 response services as a result of the ongoing impacts of the pandemic. These services included:

- Needs Assessments that address overall financial stability, housing, employment, social and emotional well-being, children and youth, elders and health and medical needs.
- Information and Referrals on resources for COVID-19, unemployment insurance benefits, public benefits and new stimulus programs and updates on available services and resources.
- Providing and/or Connecting with New Services, including addressing food insecurity, addressing gaps in childcare and employer outreach and engagement.
- Education and Client Engagement offering opportunities to address social isolation through remote options and engaging volunteers to support.

### **Test Exemptions and Accommodations**

Contractor staff assist individuals apply for test exemptions and accommodations to ensure they have the best support to pass the naturalization test successfully. The process to obtain exemptions and accommodations is often complex and lengthy, so assistance from trained staff is vital to 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 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.

## **Outreach Participants**

Providers prioritize services for outreach participants with customized services that address the special needs of the targeted outreach population. For example, elderly refugees may suffer from age-related memory loss and challenges concentrating, which may result in difficulty learning English and memorizing history content. 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 receiving ABD or SSI to waive English language proficiency requirements based on their age and the length of their legal permanent resident status. Some contractors are also able to provide tutoring for homebound outreach participants.

## **Naturalization Completion Reporting**

Contractor staff assist clients throughout the naturalization process, from completion and submission of the application, to responding to USCIS requests for additional information and accompanying clients to their 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 services from application submission to follow-up, which includes reporting successful naturalization. By reporting naturalization completions to ORIA, contractors are confirming they have successfully assisted eligible refugees and immigrants in becoming U.S. citizens. After naturalization completion, contractors may also assist clients with voter registration and notification of naturalization to all necessary agencies such as the Social Security Administration.

In SFY 2022, USCIS reported that the processing time for the N-400 (citizenship) applications in the Seattle Field Office was approximately 19.5 months, which is twice the length of time of prior years. For part of SFY 2022, the ongoing impacts of COVID-19 dramatically decreased the ability for program participants to naturalize as USCIS limited the number of naturalization interviews as well as oath ceremonies. Towards the end of SFY 2022, there were reports of processing time being as fast as four months for a few applicants. ORIA continues to work with providers to monitor 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). In recent years, providers reported an increase in the need for naturalization services, as many people in our communities are eager for protections and opportunities afforded through naturalization. To address the increasing need for services, ORIA providers leverage state dollars with other funds, such as grants from USCIS and private foundations to support the need for comprehensive naturalization services.

In 2019, the Washington State Legislature recognized the need to invest more than \$1,657,000 in naturalization services and allocated \$889,000 in additional funds for naturalization for SFY 2021 and \$888,000 for SFY 2022. This brought the total allocation for SFY 2022 to \$2,545,000. This increase illustrates Washington's commitment to the critical role naturalization plays in civic engagement and successful integration into life in the U.S. In order to collaboratively develop a program funding plan, ORIA met with naturalization service providers to identify how best to invest the additional funds to enhance services for

### Participant Success Story:

Claudia is from Mexico and worked in agriculture for four years to provide for her family. Claudia struggled with language barriers when attending school meetings and doctor's appointments. She took ESL classes with Nuestra Casa for three years before registering for citizenship classes. She naturalized in May 2022, and was also able to apply for a certificate of citizenship for her daughter. Claudia is very thankful for the opportunity and support DSHS provided for her and her family and would like to motivate other parents who may be in the same situation to not give up and chase the American dream for a better future and opportunity for oneself and their families.

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Nuestra Casa (NC)

Washington residents seeking to become U.S. citizens.

The ongoing impacts of COVID-19 on naturalization services, through USCIS office closures and service cancelations as well as the move remote work, continued to have an effect on the ability of ORIA providers to fully expend their contracted funding amounts.

In SFY 2022, the Naturalization Services Program expended \$2,234,261.33. The following chart shows total program disbursements for SFY 2018-2022:

<b>State Fiscal Year</b>	<b>Total Budget</b>	<b>Total Distribution</b>
2018	\$1,657,000.00	\$1,657,000.00
2019	\$1,657,000.00	\$1,651,175.00
2020	\$2,545,000.00	\$2,153,267.01
2021	\$2,546,000.00	\$2,264,123.25
2022	\$2,545,000.00	\$2,234,261.33

## **PROGRAM DISBURSEMENTS**

Naturalization Services Program contracts follow a state fiscal year schedule (July 1 to June 30). In SFY 2022, ORIA once again entered into performance-based contracts with providers structured on services provided and naturalization completions. This model meets the performance based outcome criteria for contracting required by the Governor’s Executive Order 10-02, Performance Based Contracting. Under an 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 down their contracts. Contractors submit invoices for naturalization services on a monthly basis and may submit billings up to 30 days after each month of service. DSHS has 30 days from the date of receipt and approval of each invoice to process and make payment.

This chart shows SFY 2022 program expenditures by service type:

### **Program Expenditures, SFY 2022**



<b>Service</b>	<b>Expenditures</b>
N-400 Assistance	\$780,772.65
Fee Waiver Request	\$269,400.00
Reduced Fee Request	\$600.00
USCIS N-400 Application Fee Reimbursement	\$7,040.00
Reduced Application Fee Reimbursement	\$0.00
USCIS Fingerprint Fee Reimbursement	\$935.00
Disability Exception Assistance - USCIS N648 Form	\$102,900.00
Interpreter Services Reimbursement for N-648 Medical Appointments	\$0.00
FOIA Request Fee Reimbursement	\$0.00
Citizenship Training Hours	\$267,196.50
Citizenship Workshop	\$25,000.00
Appeals	\$1,200.00
Interview Preparation	\$113,500.00
Interview Assistance	\$95,800.00
Transportation Cost Reimbursement	\$8,392.18
N-600 Assistance	\$42,700.00
N-600 Application Fee Reimbursement	\$0.00
Translation & Notary Reimbursement for N-600 Support Docs	\$0.00
N-600 Completion Reporting	\$3,700.00
COVID-19 Response	\$26,250.00
Annual Performance Outcome Goal Achievement	\$402,800.00
Specialized Naturalization Services (Specialized Project)	\$66,000.00

Service	Expenditures
Annual Performance Outcome Goal Achievement (Specialized Project)	\$16,500.00
CLINIC Convening 2021 Conference for Providers	\$3,575.00
<b>Total</b>	<b>\$2,234,261.33</b>

## PROGRAM OUTCOMES

In SFY 2022:

- 3,846 unduplicated clients received Naturalization services, of which 594 (15%) were Outreach participants.
- 1,315 Naturalization completions were reported for the total unduplicated caseload including N-600 completions.

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

The following chart reflects reported payment points outcome data for SFY 2022, with a four-year look-back:

### SFY 2018-2022 Outcomes

Service	2018	2019	2020	2021	2022
Application Assistance (2018, 2019 & part of 2020 included N-400 & fee waiver. In 2020, ORIA separated the services for payment & tracking)	1,658	1,706	509	n/a	n/a
N-400 Assistance	0	0	1,030	1,782	1,749
Fee Waiver Request	0	0	1,090	1,844	1,796
Reduced Fee Request	0	0	7	12	4
USCIS N-400 Application Fee Reimbursement	0	0	13	10	11
Reduced Application Fee Reimbursement	0	0	5	3	0

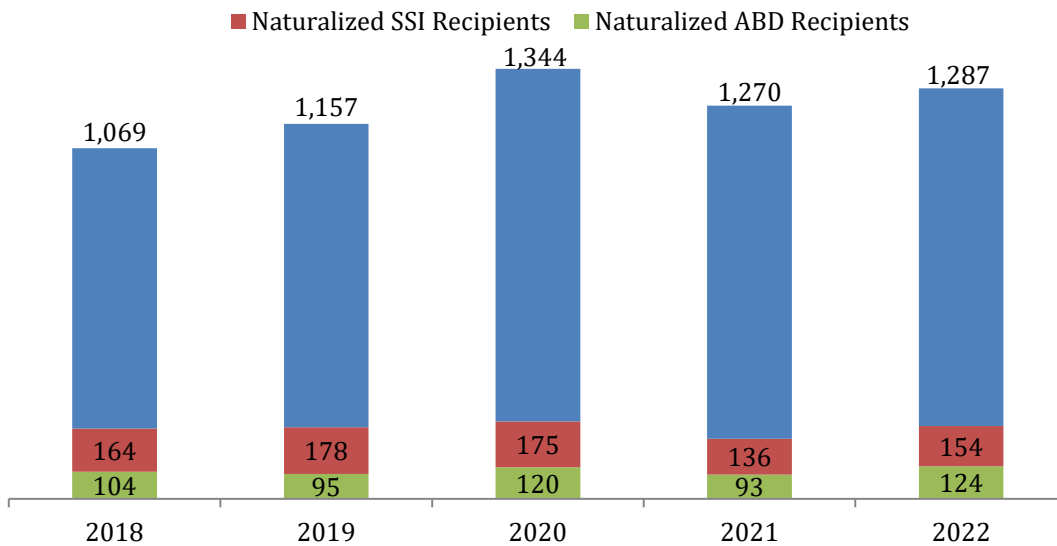
<b>Service</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
USCIS Fingerprint Fee Reimbursement	0	2	18	12	11
Disability Exception Assistance - USCIS N648 Form	305	309	285	347	343
Interpreter Services Reimbursement for N-648 Medical Appointments	0	0	3	1	0
FOIA Request Fee Reimbursement	0	0	0	0	0
Citizenship Training Hours	19,964 Hours	18,855 Hours	14,881 Hours	14,856 Hours	17,813.1 Hours
Citizenship Workshop	0	0	13	17	10
Appeals	5	2	6	3	4
Interview Preparation	448	801	795	829	1,135
Interview Assistance	191	361	300	305	479
Transportation Cost Reimbursement	0	0	175	24	40
Naturalization Completion Follow-up	1,069	1,157	1,344	1,207	1,278
N-600 Assistance	0	0	97	218	127
N-600 Application Fee Reimbursement	0	0	7	4	0
Translation & Notary Services Reimbursement for N-600 Support Docs	0	0	0	0	0
N-600 Completion Reporting	0	0	21	63	32
COVID-19 Response	0	0	1,152	910	175
Technical Assistance (NWIRP Specialized Project)	94	123	31	42	43
Case Analysis (NWIRP Specialized Project)	18 <sup>10</sup>	33	20	23	25

<sup>10</sup> Naturalization Completion was not a part of the Specialized Naturalization Services Program's performance outcome goal in SFY 2018 because the USCIS processing time has averaged approximately 16 – 18 months for applications with non-complex cases.

Service	2018	2019	2020	2021	2022
Trainings to other DSHS Providers (NWIRP Specialized Project)	2	2	2	3	3

The following chart shows the number of clients who have been granted U.S. citizenship status through the naturalization process from SFY 2018-2022, with breakout counts for SSI and ABD recipients who have naturalized:

### Total Number of Naturalized Participants, SFY 2018-2022<sup>11</sup>



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 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 these fees prohibitive, and without DSHS’s free Naturalization Services Program, many may not attempt to apply to naturalize.

<sup>11</sup> Data Source: RIA, ACES Database Warehouse as of 10/14/2022.

While the high cost of application fees can be a barrier to individuals applying for citizenship, 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 documentation to support their request. In SFY 2022, contractors reported helping participants submit 1,796 fee waiver requests to USCIS. While there is great benefit in seeking waivers, filing waiver requests requires a significant amount of time and effort for both the service provider and the applicant. Submitting a fee waiver request will generally increase the processing time by about two months.

To pass the citizenship test, applicants must have a detailed understanding of U.S. civics, history and political 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 rigorous and scaled curricula into their naturalization classes, which include strategies for those with limited English skills.

ORIA 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;
- Limited English conversational skills, which are exacerbated under the pressure of the citizenship interview;
- Meeting the unique learning needs, capabilities, and skill levels of participants;
- Challenges in obtaining test exemptions and/ or accommodations; and
- High costs related to the naturalization process: \$640 application fee and \$85 for the mandatory fingerprint fee for a total of \$725.

Another barrier in the naturalization process relates to Medical Disability Waivers (N-648). Over the past few years, DSHS contractors have experienced an increased number of disability waiver denials by USCIS. A disability waiver enables clients with disabilities, 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 Washington state and both the federal Office of Refugee Resettlement and USCIS recognizes this issue and have organized discussions and trainings related this topic for both providers and USCIS staff. A major 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 USCIS the struggles that many providers face in obtaining an approval of the N-648 Disability Exception Requests for clients. The rejection of N-648s increases the time contractors need to spend to resubmit applications, and denials of N-648s may result in some 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 to improve how medical experts complete disability waivers for a greater likelihood of approval.

ORIA recognizes the key role service providers play in identifying issues, strategies and solutions to help address systemic barriers to naturalization. During SFY 2022, ORIA encouraged stakeholders to conduct innovative outreach to clients, share program successes and challenges, and advise the office on the contracting structure. The intent is to work together to continuously improve the program to enhance the quality and effectiveness of naturalization services for Washington state residents.

# **APPENDIX A**

## **BASIC INFORMATION ON BECOMING A UNITED STATES CITIZEN**

### **Who is eligible?**

Legal permanent residents (LPR) are individuals 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 five 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, 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 eligibility requirements, they may file a USCIS Application for Naturalization with required photos and a money order or check for the application fee (\$640) and fingerprint fee (\$85) to USCIS. The process takes approximately 18-23 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 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 seven-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 naturalize, automatically become U.S. citizens. Citizens can vote, travel abroad without worrying about re-entry permits, are protected from deportation and can apply for certain government jobs.



## APPENDIX B

### SFY 2022 NATURALIZATION CONTRACTS

<b>Contractor</b>	<b>Contract Amount</b>
<b>REGION 1</b>	
La Casa Hogar	\$ 111,000
Nuestra Casa	\$ 21,500
World Relief – Spokane	\$ 280,000
World Relief – Tri Cities	<u>\$ 100,000</u>
Region 1 Total	\$ 512,500
<b>REGION 2</b>	
City of Seattle	\$ 695,000
International Rescue Committee	\$ 185,000
Refugee & Immigrant Services NW	\$ 220,000
Refugee Federation Service Center	\$ 195,000
Ukrainian Community Center of WA	<u>\$ 115,000</u>
Region 2 Total	\$1,410,000
<b>REGION 3</b>	
Korean Women’s Association	\$ 198,000
Lutheran Community Services NW (Clark & King Counties)	\$ 201,000
Multicultural Self-Sufficiency Movement	\$ 101,000
Tacoma Community House	<u>\$ 40,000</u>
Region 3 Total	\$ 540,000
<b>STATEWIDE</b>	
NW Immigrant Rights Project (Specialized Project)	<u>\$ 82,500</u>
Statewide Total	\$ 82,500
<b>TOTAL CONTRACT AMOUNT</b>	<b>\$2,545,000</b>