

# **REPORT TO THE LEGISLATURE**

## **Naturalization Services**

Chapter 376, Laws of 2024 (ESSB 5950, Section 205(4))

January 1, 2025

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## EXECUTIVE SUMMARY

Chapter 376, Laws of 2024 (ESSB 5950 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) 2024 (July 1, 2023 – June 30, 2024).

### 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 \$100 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 100 providers serve approximately 20,000 individuals<sup>1</sup> annually.

These services are comprised of 21 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 language instruction, case management, self-sufficiency education, asylee services, refugee health screenings, health case management, behavioral health services, unaccompanied refugee minor foster care, youth educational and mentoring activities, elder services, housing stabilization, immigration-related services, naturalization, and other services.

U.S. citizenship is a critical component of civic participation and integration into local communities. 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>2</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 agencies recognized by the Office of Legal Access Programs (OLAP) within the U.S. Department of Justice, including community-based organizations, nonprofit legal services organizations and refugee resettlement programs. In addition,

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<sup>1</sup> [ESA Briefing Book 2023: Refugee and Immigrant Assistance \(RIA\)](#)

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

ORIA collaborates and 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 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 eligibility screening, application assistance, preparing fee waiver requests, assistance in 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 reporting to confirm enrolled clients have naturalized.

With an increase in state funding beginning in SFY 2020, ORIA expanded services to help participants apply for Certificate of Citizenship for their children after naturalization and mitigate barriers for low-income applicants, such as the cost of transportation to naturalization interviews when USCIS shifted some appointments from their Seattle-based office to their Portland and Yakima field offices. These services continued throughout SFY 2024.

### **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>3</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 then become eligible to receive state-funded Aged, Blind, or 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.

### **Program Budget and Expenditures**

In SFY 2024, the Legislature appropriated \$3,545,000 in general state funds (GF-S) for the Naturalization Services Program. During the reporting period, ORIA expended \$3,268,341 through its 15 contracted providers.

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<sup>3</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.

## Program Outcomes

In SFY 2024, the Naturalization Services Program served 4,308 unduplicated clients. Out of those served, the program served 575 (13%) outreach participants, and 1,870 became naturalized U.S. citizens.

## Changes and Challenges

In SFY 2024, ORIA offered 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, learn 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 2024, many service providers continued to experience a higher than usual employee turnover, requiring ORIA to provide more technical assistance and training to support new staff members.

In April 2024, USCIS increased the filing fee for naturalization to \$760 for a paper filing, or to \$710 for online filing (online filing is not currently available when an applicant is requesting either a reduced fee or a fee waiver). Under the 2024 fee rule, there is no separate biometric fee. As part of the same rule, USCIS also increased access to naturalization by expanding eligibility for a reduced fee (\$380) for applicants who have household incomes that are between 150% and 400% of the federal poverty level (FPL). There is no separate form for reduced fee request as this is now done via the N-400 with supporting documentation. The prior 2016 rule only reduced the application fee to \$320 if the applicant had a household income between 150% and 200% of the FPL.

## BACKGROUND

Washington has a large and dynamic immigrant community and is among the top refugee receiving states in the nation<sup>4</sup>. According to the 2023 American Community Survey, out of Washington's 2023 total estimated population of 7,812,880, approximately 15.5% (1,213,933) are foreign-born and 49% (594,998) of those are Naturalized U.S. citizens<sup>5</sup>.

Each year, USCIS naturalizes approximately 880,000 citizens during ceremonies across the U.S. and around the world. In federal fiscal year 2023, 875,506 people became U.S. citizens, including 22,710 people in Washington state<sup>6</sup>.

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

<sup>5</sup> U.S. Census Bureau, American Fact Finder: <https://data.census.gov/table/ACSDP1Y2023.DP02?g=040XX00US53&d=ACS%201-Year%20Estimates%20Data%20Profiles>

<sup>6</sup> USCIS, Naturalization Data Set: <https://www.uscis.gov/tools/reports-and-studies/immigration-and-citizenship-data>

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 2024, ORIA provided Naturalization Services through 15 contracts statewide with community-based organizations, nonprofit legal services organizations that specialize in immigration, and refugee resettlement agencies, all of whom are recognized by the Department of Justice (DOJ). (See **Appendix B**).

ORIA leverages existing community resources to maximize access to quality naturalization services through its contract with the City of Seattle's Office of Immigrant and Refugee Affairs New Citizens Program, which contracts with 10 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.

All organizations contracted to provide services through ORIA's Naturalization Services Program are required to be recognized by DOJ with either DOJ accredited individuals on staff and/or a licensed immigration attorney.

ORIA's naturalization services providers have ties to ethnic communities and provide bilingual services in culturally appropriate ways to people seeking naturalization services.

### Participant Success Story

Azra is from Bosnia and Herzegovina where she lived with her boyfriend and their son. When the war broke out, both her parents were killed and her brother was taken to a concentration camp. She split with her boyfriend because she couldn't stay in that area any more. Her only option was to relocate with her son. After her brother was released from the concentration camp, he got an opportunity to come to the U.S. as a refugee and soon after he applied for Azra to join him in the U.S.

After waiting for 21 years, Azra and her son were approved to join her brother in the U.S. as refugees. She finally arrived in the U.S. in 2019 but life in the US was not what she thought it would be as she was diagnosed with cancer. She was disqualified for medical treatment because she was a sponsored alien. Azra needed to become a U.S. citizen to continue receiving medical treatment.

When Azra become eligible for naturalization in February 2024, Nuestra Casa assisted Azra in submitting her N-400 application and she naturalized in May 2024. NC helped Azra regain her medical coverage on the same day and scheduled an appointment with her doctor to re-start her treatment.

Azra was very thankful for the opportunity to live in the US and the chance to get better in this country.

.....  
Nuestra Casa

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 community locations, such as community colleges, neighborhood community centers, faith-based facilities, churches, 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 2024, ORIA continued to contract with Northwest Immigrant Rights Project to provide legal consultation and training to ORIA naturalization providers and 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 who 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 to access the DSHS 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 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 years unless they naturalize. If they fail to become U.S. citizens, they are in jeopardy of losing their SSI cash benefits, which in 2024 was a maximum monthly benefit of \$943 per eligible individual and \$1,415 per eligible couple. If a client loses SSI, they may be eligible for Washington’s ABD program, which in SFY 2024 provided a maximum monthly cash benefit of \$450 for a single individual or \$570 for a married couple, and a referral to the Housing and Essential Needs (HEN) Program. Naturalization allows SSI recipients to keep or regain their federal benefits, which is a higher monthly benefit than state-funded ABD. 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;
- People with refugee or humanitarian immigration status or lawful permanent residence 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.

**Participant Success Story**

Ms. M came from Congo with her four children, three of whom are already U.S. citizens. Ms. M was afraid to apply for citizenship, because of her limited English skills. Manzanita House helped Ms. M with document screening, citizenship classes, and interview preparation. Ms. M attended every class and received positive feedback during her interview preparation. She was able to naturalize successfully. Becoming a naturalized citizen had a profound impact on Ms. M. She was able to get a US passport and visited her home country after many years. She is also planning to register to vote and participate in the upcoming presidential election.

Manzanita House (MH)

## POPULATION SERVED

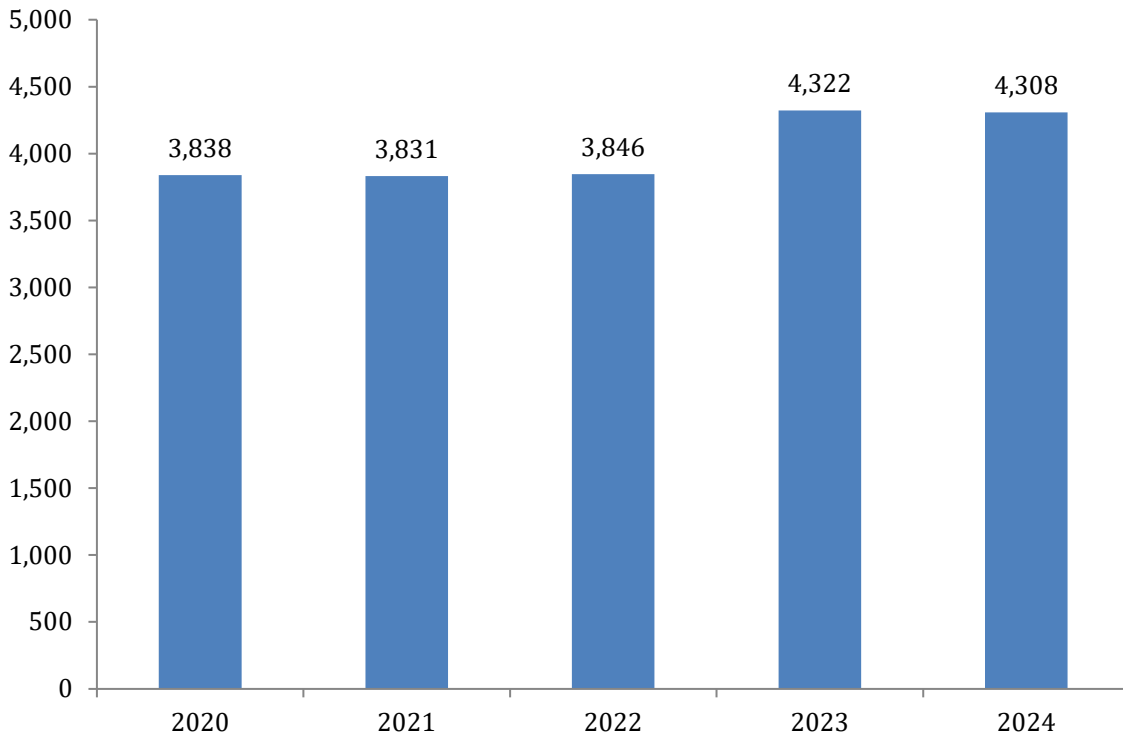
In SFY 2024, 4,308 participants received naturalization services, of which 2,594 (60%) arrived in the U.S. as refugees and 1,714 (40%) were non-refugee clients<sup>7</sup>.

The chart below shows the number of Naturalization Services Program participants from SFY 2020-2024:

<sup>7</sup> Data Source: RIA, ACES Database Warehouse as of 10/24/2024.

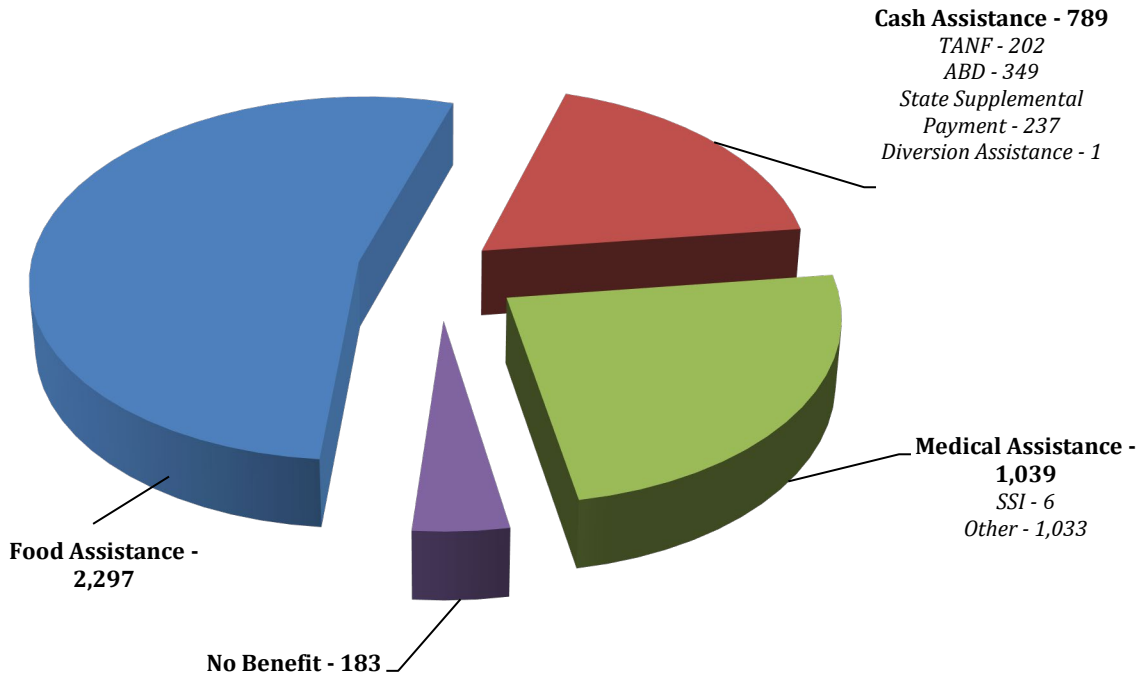


### Total Number of Participants in DSHS Naturalization Services Program SFY 2020-2024

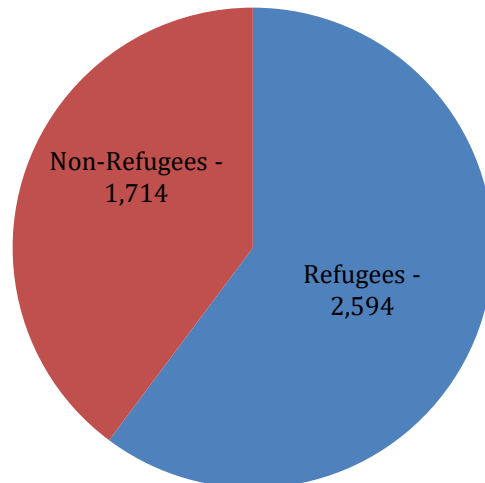


The chart below shows the total number of unduplicated participants in SFY 2024 by benefit type. If a client receives more than one form of public assistance, DSHS uses the unduplicated client count based on the following benefit type hierarchy: cash, food, and medical.

### Number of Unduplicated Participants by Benefit Type in SFY 2024<sup>8</sup>



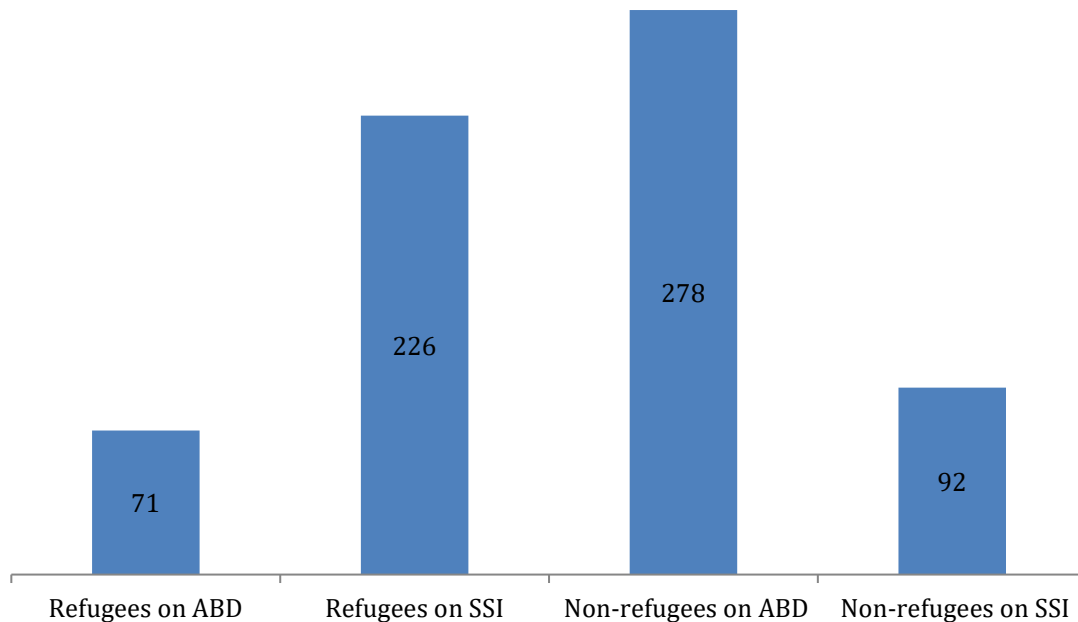
### Number of Refugees/Non-Refugees on ABD/SSI in SFY 2024<sup>9</sup>



<sup>8</sup> Data Source: RIA, ACES Database Warehouse as of 10/24/2024. 183 clients are indicated as receiving 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.

<sup>9</sup> Data Source: RIA, ACES Database Warehouse as of 10/24/2024.

In SFY 2024, 575 individuals met criteria that prioritized them as outreach participants. In addition, 92 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 2024, DSHS contracted with statewide providers to offer the Naturalization Services listed below.

- 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.

- Assistance with the 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.
- Disability Exception Request – Assistance with completion and submittal of the USCIS Medical Certification for Disability Exception (Form N-648), as well as, assistance in obtaining other test exemptions when appropriate.
- 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.
- 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.
- 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 additional sessions to practice pronunciation and diction.
- Interview Assistance – Assistance applying for special accommodations during the interview process and/or being present 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 – Providers track and monitor the progress of the client's N-400 application with the 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.

- 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 from USCIS.
- 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.
- 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 program participant to determine whether applying for naturalization would be appropriate.
- Transportation Cost Reimbursement – Reimbursement for mileage traveled as a contractor and program participant for attending an interview and/or oath ceremony when they are scheduled outside of USCIS's regular service facility.

ORIA continues to partner with Northwest Immigrant Rights Project 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.

## **Test Exemptions and Accommodations**

Contractor staff help 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 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.

## **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 currently 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 the naturalization completions to ORIA, contractors are confirming that 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 2024, USCIS reported that the processing time for the N-400 (naturalization) applications in the Seattle Field Office was approximately six months, which is less than the length of time of prior years. 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. In recent years, providers reported an increase in the need for these services, as many people in our communities are eager for the 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 2023, the Legislature continued to recognize the need to invest more than \$2,545,000 in naturalization services and allocated an additional \$1,000,000 for naturalization for SFY 2024 and \$1,000,000 for SFY 2025. This brought the total allocation for SFY 2024 to \$3,545,000. This increase illustrates Washington state’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 Washington residents seeking to become U.S. citizens.

**Participant Success Story:**

Mr. H was a successful business man before the 2008 financial crisis took most of his savings including his house. Due to financial stress, Mrs. H returned to South Korea leaving Mr. H to take care of their two children in the U.S. Once his children became turned 18, they applied for Mr. H to get his legal permanent residency. In the meantime, Mrs. H was denied a visa to return to the U.S. due to her previous overstay record. Mr. H came to KWA for assistance and enrolled in the ORIA naturalization services program in March 2024, and naturalized in May 2024. Mr. H is very appreciative of this program and KWA as it gives him new hopes to reunite with his wife soon after 16 years.

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Korean Women’s Association (KWA)

The following chart shows total program disbursements for SFY 2020-2024:

State Fiscal Year	Total Budget	Total Distribution
2020	\$2,545,000	\$2,153,267
2021	\$2,546,000	\$2,264,123
2022	\$2,545,000	\$2,234,261
2023	\$2,546,000	\$2,402,835
2024	\$3,545,000	\$3,268,341

**PROGRAM DISBURSEMENTS**

The Naturalization Services Program contracts follow a state fiscal year schedule. In SFY 2024, ORIA entered into performance-based contracts with providers structured on services provided and naturalization completions. This contracting model meets performance-based outcome criteria for contracting required by the Governor’s Executive Order 10-02. 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 2024 program expenditures by service type:

**Program Expenditures, SFY 2024**

<b>Service</b>	<b>Expenditures</b>
N-400 Assistance	\$891,025.00
Fee Waiver Request	\$396,200.00
Reduced Fee Request	\$1,750.00
USCIS N-400 Application Fee Reimbursement	\$3,200.00
Reduced Application Fee Reimbursement	\$960.00
USCIS Fingerprint Fee Reimbursement	\$680.00
Disability Exception Assistance - USCIS N648 Form	\$136,355.00
Interpreter Services Reimbursement for N-648 Medical Appointments	\$0.00
FOIA Request Fee Reimbursement	\$0.00
Citizenship Training	\$259,029.00
Citizenship Workshop	\$115,307.50
Appeals	\$175.00
Interview Preparation	\$198,000.00
Interview Assistance	\$110,000.00
Transportation Cost Reimbursement	\$783.05
N-600 Assistance	\$168,076.00

<b>Service</b>	<b>Expenditures</b>
N-600 Application Fee Reimbursement	\$2,340.00
Translation & Notary Reimbursement for N-600 Support Docs	\$0.00
N-600 Completion Reporting	\$31,950.00
Annual Performance Outcome Goal Achievement	\$768,510.00
Specialized Naturalization Services (Specialized Project)	\$169,600.00
Annual Performance Outcome Goal Achievement (Specialized Project)	\$42,400.00
CLINIC Convening 2024 Conference for Providers	\$7,050.00
<b>Total</b>	<b>\$3,268,340.55</b>

## PROGRAM OUTCOMES

In SFY 2024:

- 4,308 unduplicated clients received Naturalization services, of which 575 (13%) were Outreach participants.
- 2,132 Naturalization completions were reported for the total unduplicated caseload, including N-600 completions.

Although the main performance goal for this program 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 2024, with a four-year look-back:

### SFY 2020-2024 Outcomes

<b>Service</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Application Assistance <sup>10</sup>	509	n/a	n/a	n/a	n/a

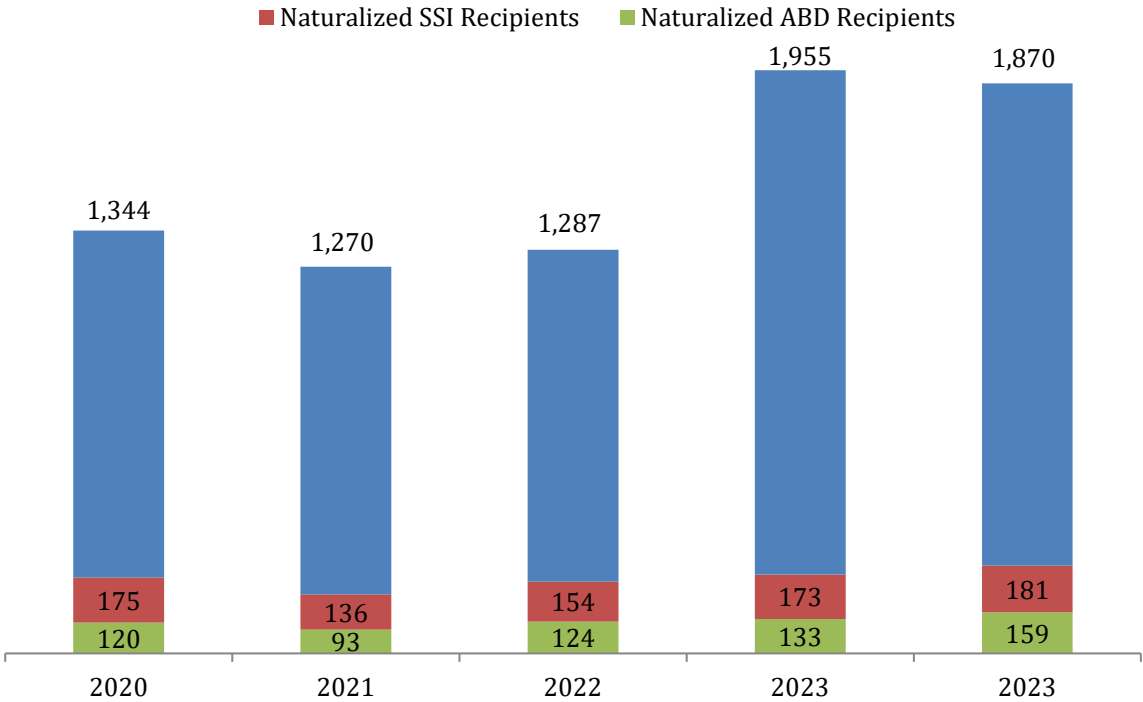
<sup>10</sup> (In 2020, ORIA separated the service in N-400 Assistance and Fee Waiver Request for payment & tracking)

<b>Service</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
N-400 Assistance	1,030	1,782	1,749	1,749	1,999
Fee Waiver Requests	1,090	1,844	1,796	1,960	2,264
Reduced Fee Requests	7	12	4	1	10
USCIS N-400 Application Fee Reimbursements	13	10	11	1	5
Reduced Application Fee Reimbursements	5	3	0	0	3
USCIS Fingerprint Fee Reimbursements	18	12	11	1	8
Disability Exception Assistance - USCIS N648 Form	285	347	343	377	431
Interpreter Services Reimbursement for N-648 Medical Appointments	3	1	0	0	0
FOIA Request Fee Reimbursements	0	0	0	0	0
Citizenship Training Hours	14,881	14,856	17,813	14,866	17,269
Citizenship Workshops	13	17	10	18	47
Appeals	6	3	4	0	1
Interview Preparation	795	829	1,135	1,317	1,320
Interview Assistance	300	305	479	444	550
Transportation Cost Reimbursements	175	24	40	29	4
Naturalization Completions Reported	1,344	1,207	1,278	1,922	1,870
N-600 Assistance	97	218	127	469	495
N-600 Application Fee Reimbursements	7	4	0	2	2
Translation & Notary Services Reimbursement for N-600 Support Documents	0	0	0	0	0
N-600 Completions Reported	21	63	32	99	213
COVID-19 Responses	1,152	910	175	n/a	n/a

Service	2020	2021	2022	2023	2024
Technical Assistance (NWIRP Specialized Project)	31	42	43	44	56
Case Analyses (NWIRP Specialized Project)	20	23	25	38	34
Trainings to other DSHS Providers (NWIRP Specialized Project)	2	3	3	3	4

The following chart shows the number of clients who have been granted U.S. citizenship status through the naturalization process from SFY 2020-2024, with breakout counts for SSI and ABD recipients who have naturalized:

**Total Number of Naturalized Participants, SFY 2020-2024<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. Not reporting 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.

<sup>11</sup> Data Source: RIA, ACES Database Warehouse as of 10/24/2024.

## 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 \$760 per person for a paper filing or \$710 for online filing, 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.

While the high cost of application fees can be a barrier to individuals applying for citizenship, USCIS 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 they need to support their request. In SFY 2024, contractors reported helping participants submit 2,264 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 generally increases 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 instructional 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 can be exacerbated under the pressure of the citizenship interview
- Meeting the unique learning needs, capabilities, and skill levels of participants
- High costs related to the naturalization process: \$760 application fee for paper filing or \$710 for online filing

Another barrier in the naturalization process relates to Medical Disability Waivers (N-648). Over the past few years, DSHS contractors have been experiencing 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.

#### Participant Success Story:

FJI, aged 60, came to the U.S. as an immigrant from Pakistan. She wanted to become a US citizen, but had limited English skills RISNW provide her with needed information about the process and interview. Due to her age and English skill, learning US history, civics, and English was not easy for her. However, she never gave up and continued with her commitment and hard work to prepare for the test. With RISNW’s support and guidance, she was able to learn all citizenship materials and successfully pass the naturalization interview. She became a U.S. citizen in June 2023. After her naturalization interview, she contacted RISNW and was very appreciative of RISNW and the DSHS naturalization program for all the assistance in her journey to become a US citizen. RISNW provided her information about registering to vote.

Refugee & Immigrant Services NW (RISNW)

ORIA collaborates with the City of Seattle’s Office of Immigrant and Refugee Affairs to coordinate and address 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 2024, 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 an 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 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 (\$760 for paper filing or \$710 for online filing) to USCIS. The process takes approximately six months from the date of the application to the 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 2024 NATURALIZATION CONTRACTS

<b>Contractor</b>	<b>Contract Amount</b>
<b>REGION 1</b>	
La Casa Hogar	\$ 224,800
Manzanita House	\$ 210,900
Nuestra Casa	\$ 104,185
World Relief – Tri Cities	<u>\$ 115,050</u>
Region 1 Total	\$ 654,935
<b>REGION 2</b>	
City of Seattle	\$ 865,600
International Rescue Committee	\$ 296,000
Jewish Family Services	\$ 110,000
Refugee & Immigrant Services NW	\$ 302,315
Refugee Federation Service Center	\$ 287,500
Ukrainian Community Center of WA	<u>\$ 203,500</u>
Region 2 Total	\$ 2,064,915
<b>REGION 3</b>	
Korean Women’s Association (Snohomish, King, & Pierce Counties)	\$ 166,500
Lutheran Community Services NW (Clark & King Counties)	\$ 242,150
Multicultural Self-Sufficiency Movement	\$ 166,500
Tacoma Community House	<u>\$ 38,000</u>
Region 3 Total	\$ 613,150
<b>STATEWIDE</b>	
NW Immigrant Rights Project (Specialized Project)	<u>\$ 212,000</u>
Statewide Total	\$ 212,000
<b>TOTAL CONTRACT AMOUNT</b>	<b>\$ 3,545,000</b>