



Seattle
Office of Immigrant and
Refugee Affairs
Hamdi Mohamed, Director

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Samantha Deshommès
Chief, Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2104

**RE: Agency Information Collection Activities; Extension, Without Change, of a
Currently Approved Collection: Application for Naturalization (USCIS-2008-0025; OMB
Control Number 1615-0052)**

Dear Division Chief Deshommès:

I write on behalf of the City of Seattle Office of Immigrant and Refugee Affairs, in response to a U.S. Citizenship and Immigration Services' (USCIS) notice of a proposed extension of a currently approved collection of information, Form N-400, Application for Naturalization ("N-400", "Form", or "Application").

The City of Seattle created the Office of Immigrant and Refugee Affairs (OIRA) in 2012 to improve the lives of Seattle's immigrant and refugee families. Through OIRA, the City of Seattle funds and coordinates two naturalization programs called the New Citizen Campaign (NCC) and the New Citizen Program (NCP) to help an estimated 75,000 Seattle-area legal permanent residents ("LPR") become U.S. citizens. Since its inception in 1997, NCP has served over 20,000 people. NCC works with community partners to co-host events called citizenship clinics and citizenship workshops all over Seattle that have to date served 2,770 LPRs.

Seattle OIRA understands that the N-400 application is necessary for the USCIS function of adjudicating the naturalization process. Both NCP and NCC support LPRs to complete the 20-page N-400 both through one-on-one case management and through volunteers at citizenship clinics. We concede that the N-400 form does reasonably well in allowing USCIS to adjudicate naturalization applications and most of the information is helpful toward fair

adjudication. But certain questions within the form make the document less useful. We have found that many portions of and questions within the application are confusing to applicants, including many of the questions in Part 12, the so-called “security questions”. The questions in Part 12 require a much higher level of English proficiency than is required by the citizenship exam. As such, many applicants need this portion of the application translated or interpreted to their native language despite having high levels of English proficiency.

USCIS should simplify the language and phrasing used. Some examples follow:

- Part 12, question 7 is an excellent example of difficult phrasing that confuses applicants:

7.A. Have you EVER not filed a Federal, state or local tax return since you became a lawful permanent resident? B. If you answered yes, did you consider yourself a “non-U.S. resident”?

This question could be made clearer by rewording it to state the following: “A. Since becoming a lawful permanent resident (getting your “green card”) have you ever failed to file a required Federal, state, or local tax return? B. If so, did you fail to file because you did not consider yourself to be a U.S. resident?”

- Question 13 should be removed from the form as the youngest associates of the Nazi party who would have been legal adults by 1945 would now be 95 years old. The very few remaining Nazis can include their party affiliation in question 9.
- Questions 15 through 21 of Part 12 are especially difficult for applicants to understand and their subparts are puzzling even for immigration advocates to distinguish. These questions are much too difficult for most applicants to answer without legal assistance, and the level of English required is much higher than even the average U.S.-born citizen can comprehend.
- The term “habitual drunkard” in Part 12, Question 30 is an antiquated term and therefore is unfamiliar to most applicants.

Some other aspects of USCIS’ adjudication of the N-400 make it unnecessarily burdensome. Filing the N-400 online is out of reach for most clients and participants of Seattle OIRA’s citizenship programming who are low-income and apply with an I-912 request for fee waiver. Until USCIS makes the fee waiver accessible online, the online filing of the N-400 – which USCIS declares to be three times shorter than completing the paper form – will only be available to those with means. USCIS should remove this barrier by creating an easily accessible online fee waiver filing system.

Moreover, most of Seattle OIRA’s more than 20 community-based nonprofit organization partners do not have the capacity to use the USCIS online filing system. As such, many

continue to file N-400s by paper even for clients who do not need the fee waiver. Partners describe difficulties in using the clients' and legal representative online accounts, which result in even more unnecessary logistical work. Additionally, cases do not show up in the online account, and multiple accounts are often created on their behalf instead of adding cases to their already-existing account, etc. Local advocates express satisfaction using the online USCIS Freedom of Information Act records request system and the agency should work to create a similarly user-friendly system for the N-400 and fee waiver.

Seattle OIRA welcomes USCIS' interest in making the N-400 a straightforward and easily understandable tool to assess eligibility for U.S. citizenship. The form and likely USCIS adjudicators themselves will benefit from integrating simpler, more concise, and contemporary language in the form's questions, as well as launching an easy and effective online filing tool that does not discriminate against applicants who need a fee waiver.

If you require further information, please do not hesitate to contact Christina Guros at christina.guros@seattle.gov. Thank you for the opportunity to submit comments on the proposed extension.

Sincerely,



Hamdi Mohamed, Director

Office of Immigrant and Refugee Affairs

City of Seattle

hamdi.mohamed@seattle.gov

(206) 727-8515