# Improving operational processes at USCIS



New, informative letters improved Form N-400 submissions

### **Key findings**

We found that mailing a new, informative letter to lawful permanent residents (LPRs) encouraging them to apply for U.S. citizenship increased naturalization application rates by 1.0 percentage point, over a baseline of 8.4 percent. We examined whether the letter had different impacts based on length of time since obtaining LPR status, region of birth, and class of admission (i.e., by what process an individual obtained LPR status). We found that every group increased submissions after receiving the letter, but observed the largest impacts for individuals who became LPRs through spousal or employer sponsorship, with the smallest increases for those born in the regions with the highest number of applicants (Mexico, China, India, and the Caribbean). The impact of the letter was greater for online submissions than mail-in submissions, and for those paying the full application fee compared to those filing with a fee waiver or reduced fee due to financial hardship. Overall, these results suggest that proactive informational outreach can significantly increase the number of LPRs applying for citizenship. However, consistent with existing literature on the bandwidth tax. LPRs in lower-income neighborhoods were less responsive to the intervention.1

## Agency priority

Millions of LPRs reside in the United States and may be eligible to naturalize (the process by which U.S. citizenship is granted after meeting the requirements established by Congress), but have not completed the application process.<sup>2</sup> The Department of Homeland Security's (DHS) United States Citizenship and Immigration Services (USCIS) aims to expand awareness of the naturalization process by making tools and resources available to LPRs and to reach out to engage these communities in creative ways.<sup>3</sup>

### **Outreach change description**

To begin the naturalization process, applicants must complete the Form N-400 submission process, which is the application required to apply for naturalization as a U.S. citizen.<sup>4</sup> Most LPRs can apply for naturalization if they have been LPRs for five years and resided in the U.S. for at least 30 months. The application process requires the individual to submit the Form N-400, be of "Good Moral Character," participate in a naturalization interview, and pass both an English and Civics exam.<sup>5</sup> Individuals who submit the N-400 must also pay the current application fee, which was \$725 at the time the evaluation began.

There are a number of barriers that potentially eligible LPRs may face which may lead them not to apply for naturalization. First, research has consistently found that individuals avoid difficult or time-consuming tasks, especially when the benefits are unclear or not experienced until far into the future. Another barrier is application filing fees, as prior research found that informing eligible LPRs about the fee waiver program increased application rates. Making benefits more salient, highlighting how people like the individual have completed these tasks, and providing tools to practically and cognitively simplify the process, can all increase participation rates.

<sup>&</sup>lt;sup>1</sup> Mani, A., Mullainathan S., Shafir, E., Zhao, J. (2013). Poverty impedes cognitive function. *Science* 341, 976–980.

<sup>&</sup>lt;sup>2</sup> Baker and Miller (2022). DHS Office of Immigration Statistics. Estimates of the Lawful Permanent Resident Population in the United States and the Subpopulation Eligible to Naturalize: 2022. https://ohss.dhs.gov/sites/default/files/2023-12/2022 0920 plc y lawful permenent resident population estimate 2022 0.pdf.

<sup>&</sup>lt;sup>3</sup> U.S. Citizenship and Immigration Services. FYs 2023-2026 Strategic Plan (2022), https://www.uscis.gov/sites/default/files/document/reports/StrategicPlanFY23.pdf.

<sup>&</sup>lt;sup>4</sup> A number of potential barriers are raised in this 2021 U.S. Congressional Research Report on U.S. Naturalization Policy: <a href="https://crsreports.congress.gov/product/pdf/R/R43366">https://crsreports.congress.gov/product/pdf/R/R43366</a>.

<sup>&</sup>lt;sup>5</sup> Individuals who are married to a U.S. citizen or who served in the military can apply sooner than five years, and some applicants who are long-term residents can receive exemptions to the exams. "Good Moral Character" is discussed in USCIS Policy Manual Volume 12, Part D, Chapter 9: https://www.uscis.gov/policy-manual/volume-12-part-d-chapter-9.

<sup>&</sup>lt;sup>6</sup> Hotard, M., Lawrence, D., Laitin, D.D. *et al.* (2019). A low-cost information nudge increases citizenship application rates among low-income immigrants. *Nat Hum Behav* 3, 678–683. Hainmueller, J., Lawrence, D., Gest, J., Hotard, M., Koslowski, R., & Laitin, D. D. (2018). A randomized controlled design reveals barriers to citizenship for low-income immigrants. Proceedings of the National Academy of Sciences, 115(5), 939-944.

We collaborated with USCIS to create an outreach letter and web page designed to encourage potentially eligible LPRs to submit a Form N-400 application. Each letter used positive language to encourage the individual to apply, provided a checklist of activities to make the process more manageable, highlighted many of the long-term benefits of becoming a U.S. citizen, and provided statistics showing the pass rates of the naturalization exams. The letter also referenced both the fee waiver process and existing USCIS resources available to connect applicants with free legal services. The letter included a QR code that took the reader to a web page that included the same contents of the letter in multiple languages, a link to file online, and a series of relevant resources available on the main uscis.gov website. Although all the information provided in the letter and web page is publicly available elsewhere, this proactive outreach was a new step that consolidated the information to make it easier to access. Both the letter and web page contents were available in English, Arabic, Chinese, French, Haitian Creole, Korean, Spanish, Tagalog, and Vietnamese.

### **Evaluation design**

The outreach change was evaluated with an individual-level randomized control trial. USCIS identified 1,861,178 individuals potentially eligible to naturalize, as they had not yet submitted a Form N-400 application and had been LPRs for between six and nine years.<sup>9</sup>

Of that sample, USCIS mailed identical letters to 300,000 randomly selected individuals between late October and early December 2023, stratified by an individual's years as an LPR (6, 7, 8, or 9), class of admission (Employment, Family, Spouse, Humanitarian, or Parent), and region of birth (Mexico, China/India, Caribbean, Central/South America, or Other). The remaining 1,561,178 individuals in the control group were not sent the letter.

This project is a collaboration between the Office of Evaluation Sciences and the U.S. Department of Homeland Security

USCIS worked to identify up-to-date addresses for the treatment group, and, in the case when a letter was returned with a forwarding address, they resent the letter.

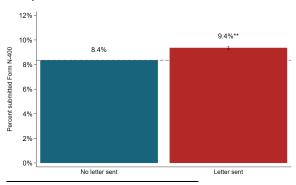
### Analysis of existing data

Form N-400 filing dates through June 2024 were used to compare application rates between the two groups. <sup>10,11</sup> The data included the three stratification categories and a small set of other background characteristics:age, gender, marital status, nation of birth, geographic residence (state, zip code, and core-based statistical area), and a USCIS-created variable for propensity to naturalize. We also examined whether effect sizes differed by an applicant's class of admission, region of birth, or by the number of years they were LPR.

#### Results

We found that individuals who received the new outreach letter were 1.01 percentage points (p < .001, 95% CI [0.0089, 0.0112]) more likely to submit a Form N-400 application by June 2024, which was approximately six to eight months after receiving their letter. Given that only 8.4% of the comparison group, who did not receive the new letter, submitted a Form N-400 during the same time, this translates into a 12% increase in submission rates over the baseline.

**Figure 1.** LPRs who were sent a letter were more likely to submit a Form N-400



<sup>&</sup>lt;sup>10</sup> Unless noted otherwise, all of the analysis reported in this abstract was prespecified in a pre-analysis plan, which can be found at <a href="https://oes.gsa.gov/assets/analysis/2121-dhs-increasing-naturalization-analysis-plan-final.pdf">https://oes.gsa.gov/assets/analysis/2121-dhs-increasing-naturalization-analysis-plan-final.pdf</a>.

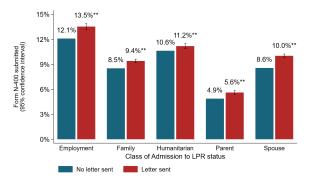
<sup>&</sup>lt;sup>8</sup> Madrian, B. C. (2014). Applying Insights from Behavioral Economics to Policy Design. *Annual Review of Economics*, 6 (Volume 6, 2014), 663-688.

<sup>&</sup>lt;sup>9</sup> USCIS also removed additional individuals such as those with classes of admission protected from disclosure under 8 U.S.C. Section 1367, who were under the age of 18, and had no address or zip code. The entire list is available in the full report.

<sup>&</sup>lt;sup>11</sup> The pre-analysis plan proposed to evaluate Form N-400 submissions six months after individuals received the letter, but staggered rollout and the lack of mailing dates in the control group required a fixed completion date. We chose June, as it was approximately six months after the last treatment group received their letter.

We found that treatment effects were positive and statistically significant for each stratification group: years since LPR status, class of admission, and region of birth. Figure 2 shows that the largest treatment effects were for individuals whose class of admission to LPR was via spouse-sponsored or employment-sponsored processes, whose Form N-400 submissions increased approximately 1.4 percentage points. Individuals who classified via family, humanitarian, or parent class of admission exhibited smaller treatment effects from 0.6 to 0.9 percentage points.

**Figure 2.** LPRs who were admitted via employment or spouse classes of admission were more likely to respond to the letter



We also found slightly larger treatment impacts for individuals born in Central and South America or Other regions, and smaller impacts for those born in Mexico, China, India, or the Caribbean.

One important question is whether the letter was effective across LPRs with varying degrees of resources. To examine this in the context of our evaluation, we examined whether the letter had a differential effect on online submissions and mailbased submissions, as well as whether it had a differential effect for LPRs paying the full naturalization application fee compared to those who file with a partial or full fee waiver due to financial hardship.

We found that the letter increased online and paper Form N-400 submissions by 0.7 and 0.3 percentage points, respectively. We also found that Form N-400 applications with a full

application fee increased by 0.8 percentage points, whereas the effect for submissions with a full or partial fee waiver was only 0.2 percentage points.

These results, combined with additional analysis that found smaller impacts among individuals in lower-income zip codes, suggest that the letter was more effective for LPRs who had the ability to file online and pay the full fee. While we observe a positive effect among those who file with a federal fee waiver, the effects are smaller, even though the letter did provide LPRs with resources to check their eligibility for the fee waiver and to find free or reduced-fee legal help to file.

### **Implications**

We found that this low-cost, scalable effort significantly increased LPRs' applications for citizenship. The intervention led to an increase of approximately 3,000 additional Form N-400 submissions in the treatment group, and would have increased submissions by 18,600 had we sent letters to the full sample. Our sample did not include individuals who became LPRs ten or more years prior, and who might also benefit from the intervention.

Given that USCIS had not previously engaged in proactive outreach efforts towards this population, significant attention was paid to designing multilingual materials that used welcoming language, spoke directly to the challenges faced by this specific population, and provided easy to follow online links. Future work could examine the relative effectiveness of alternate interventions for example, mailers versus email outreach. This work could also consider other strategies or messaging that might target individuals in lowerincome zip codes, who had smaller treatment effects. Other agencies looking to increase participation rates in key programs could consider incorporating outreach designed to motivate the reader and consolidate disparate yet relevant pieces of information.