

PROMOTING CITIZENSHIP

ASSESSING THE IMPACTS OF THE PARTIAL FEE WAIVER

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INTRODUCTION

Naturalization can have large economic and civic benefits for both immigrants and the native-born (Gonzalez-Barrera et al. 2013; Pastor and Scoggins 2012). Yet there are 8.5 million adults in the U.S. who are eligible to naturalize but have not. The barriers to naturalization are both individual, including English-language ability and fear of the citizenship test, as well as structural, including the cost of naturalization and the civic infrastructure that does (or does not) encourage citizenship. Given the recent revised fee proposal from the Department of Homeland Security¹ (DHS) – in which it newly introduces a reduced fee of \$320 for naturalization applicants with family income greater than 150 percent and not more than 200 percent of the Federal Poverty Guidelines – one of those barriers is being lowered.

While it is not the only barrier, it is important psychologically—in focus groups, many immigrants list it as a main concern—and it is one of the factors most amenable to change in order to ease the naturalization process. The proposed fee change has come as a result of a regular process: the United States Citizenship and Immigration Services (USCIS) administration changes fees periodically and when doing so must first submit a “comprehensive fee study” and then eventually file final fee schedules with the Code of Federal Regulations (CFR). The last change to fees took effect in November 2010 (Preston 2010). It was then that USCIS provided a standard means for submitting fee-waiver requests on the naturalization application process. Before this, full fee waivers were applied on a case-by-case basis since the early 2000s. However, given that such waivers have been limited to individuals with household income at or below 150 percent of federal poverty guidelines, many near-poor or working poor families were left without needed assistance.

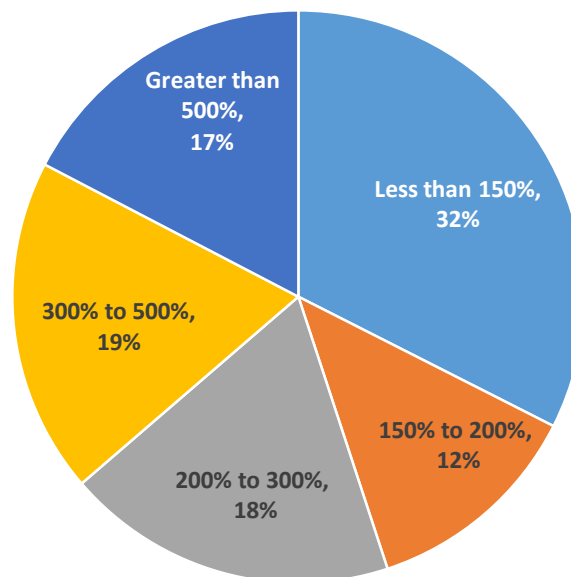
Now, potentially 1 million adults would be eligible for partial fee waivers through this new action. The National Partnership for New Americans, along with many others, has advocated on behalf of many working poor LPRs who effectively were just beyond the cusp of financial assistance but also far from the realization of citizenship. New partial fee waivers for this important subset of price-sensitive eligible LPRs could have an important impact on naturalization rates across the country, particularly for those who are lower-income and for whom the fee has been seen as a significant barrier.

¹ The recent proposal can be found on the [Federal Register](http://www.federalregister.gov) website.

PARTIAL WAIVER ELIGIBLE-TO-NATURALIZE

A significant share of the 8.5 million eligible-to-naturalize adults will be eligible for the proposed partial fees waivers on the Application for Naturalization (Form N-400). Being within the 150-200 percent of poverty guidelines translates to a family of four earning in between \$36,450 and \$48,600 annually. As noted above, there are approximately 1 million eligible adults who fall within this category, comprising up to 12 percent of all adults eligible-to-naturalize who have not yet made the passage to citizenship (Figure 1). This is in addition to the 32 percent of adults who already are potentially eligible for full fee waivers. In other words, poor eligible adults are nearly 45 percent of the total eligible adults and economic relief to address naturalization fees could be important.

Figure 1 - Adult Eligible-to-Naturalize by Poverty Bands, United States, 2010-2014



The partial fee waiver eligible are not just a significant share but also are present in every state of the country (Figure 2). As might be expected, the shares are higher in certain states that have long been identified as important homes for immigrants. California, for example, contains 26 percent of all partial waiver eligible; if we add those in Texas, New York, and Florida, just these 4 states represent slightly over 60 percent of the total in the country. But as Figure 2 makes clear, the potential for the fee waiver to promote citizenship exists all over the country.

Figure 2 - Adult Eligible-to-Naturalize by Poverty Bands by State, 2010-2014

State	Total ETN Adult Population	Distribution Across States	Total ETN Adult Population At or Below 150% Poverty	As percent of ETN Adult Population	Total ETN Adult Population Between 151-200% Poverty	As percent of ETN Adult Population
Alabama	27,632	0%	9,575	35%	3,145	11%
Alaska	9,331	0%	2,056	22%	1,364	15%
Arizona	201,431	2%	84,596	42%	27,214	14%
Arkansas	26,588	0%	9,825	37%	5,073	19%
California	2,175,753	26%	741,113	34%	294,201	14%
Colorado	104,902	1%	31,739	30%	12,841	12%
Connecticut	100,164	1%	19,695	20%	9,429	9%
Delaware	12,962	0%	2,566	20%	1,350	10%
District of Columbia	19,178	0%	4,027	21%	1,960	10%
Florida	824,588	10%	301,036	37%	113,385	14%
Georgia	191,762	2%	60,940	32%	24,757	13%
Hawaii	53,882	1%	13,983	26%	5,340	10%
Idaho	21,882	0%	9,245	42%	2,358	11%
Illinois	352,806	4%	96,552	27%	45,054	13%
Indiana	57,515	1%	18,329	32%	7,621	13%
Iowa	26,366	0%	7,782	30%	2,664	10%
Kansas	37,163	0%	11,930	32%	4,740	13%
Kentucky	27,351	0%	8,599	31%	2,531	9%
Louisiana	30,079	0%	8,609	29%	3,639	12%
Maine	10,260	0%	3,130	31%	1,148	11%
Maryland	152,250	2%	27,929	18%	15,051	10%
Massachusetts	198,393	2%	48,430	24%	17,981	9%
Michigan	114,513	1%	32,848	29%	12,773	11%
Minnesota	66,260	1%	19,573	30%	6,269	9%
Mississippi	11,486	0%	3,345	29%	1,709	15%
Missouri	46,717	1%	13,275	28%	5,197	11%
Montana	4,267	0%	701	16%	440	10%
Nebraska	19,766	0%	6,728	34%	3,438	17%
Nevada	112,244	1%	34,003	30%	15,904	14%
New Hampshire	16,162	0%	2,325	14%	1,506	9%
New Jersey	360,494	4%	82,813	23%	36,585	10%
New Mexico	53,952	1%	25,762	48%	8,423	16%
New York	881,993	10%	289,983	33%	98,867	11%
North Carolina	142,563	2%	52,830	37%	18,039	13%
North Dakota	3,547	0%	982	28%	398	11%
Ohio	80,440	1%	19,166	24%	7,637	9%
Oklahoma	39,069	0%	14,400	37%	4,681	12%
Oregon	85,949	1%	28,816	34%	11,468	13%
Pennsylvania	138,507	2%	40,325	29%	14,208	10%
Rhode Island	29,062	0%	10,844	37%	3,263	11%
South Carolina	41,358	0%	12,518	30%	4,169	10%
South Dakota	3,284	0%	1,190	36%	281	9%
Tennessee	58,117	1%	18,738	32%	6,446	11%
Texas	994,922	12%	387,432	39%	137,860	14%
Utah	47,877	1%	16,541	35%	6,817	14%
Vermont	4,799	0%	719	15%	379	8%
Virginia	175,999	2%	34,722	20%	17,555	10%
Washington	180,628	2%	49,202	27%	19,752	11%
West Virginia	3,817	0%	941	25%	339	9%
Wisconsin	50,611	1%	14,256	28%	5,763	11%
Wyoming	3,494	0%	1,062	30%	193	6%
Total U.S.	8,434,135	100%	2,737,726	32%	1,053,205	12%

Notes:

Source: USC Center for the Study of Immigrant Integration (CSII) analysis of a pooled sample of the 2010 through 2014 American Community Survey (ACS) microdata accessed from the Integrated Public Use Microdata Series (IPUMS).

Total populations are restricted to only for whom poverty status is determined.

Disaggregating the eligible-to-naturalize by waiver-eligible and region of origin (Figure 3), 72 percent of the partial eligible are from Latin America – who are disproportionately Mexican-origin. Mexicans and other Latin Americans have the highest rates of waiver-eligibility but a large share of Asian and African LPRs will also potentially benefit from the rule change.

Figure 3 - Eligible-to-Naturalize Adults by Origin and Poverty Status, United States, 2010-2014

<i>Origin</i>	<i>Total ETN Adult Population</i>	<i>Total ETN Adult Population At or Below 150% Poverty</i>	<i>As percent of ETN Adult Population</i>	<i>Total ETN Adult Population Between 151-200% Poverty</i>	<i>As percent of ETN Adult Population</i>
Mexico	2,773,828	1,220,461	44%	453,644	16%
Central America	686,665	263,049	38%	108,951	16%
South America and Caribbean	1,464,625	511,628	35%	193,419	13%
Asia	1,793,111	392,254	22%	151,657	8%
Europe	1,076,551	197,963	18%	89,850	8%
Africa	275,589	85,023	31%	28,787	10%
Rest of world	363,770	67,343	19%	26,903	7%

Notes:

Source: USC Center for the Study of Immigrant Integration (CSII) analysis of a pooled sample of the 2010 through 2014 American Community Survey (ACS) microdata accessed from the Integrated Public Use Microdata Series (IPUMS).

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While all can gain, the high cost of citizenship disproportionately affects Mexicans. In Figure 4 we see Mexican-origin eligible-to-naturalize are overrepresented in the lowest income categories, thus more likely eligible for waivers. For example, Mexicans represent 43 percent of all eligible-to-naturalize within the proposed partial waiver category, whereas they represent only one-third of all eligible.

Figure 4 - Share of Eligible-to-Naturalize Adults who are Mexican-origin by Poverty Bands, United States, 2010-2014

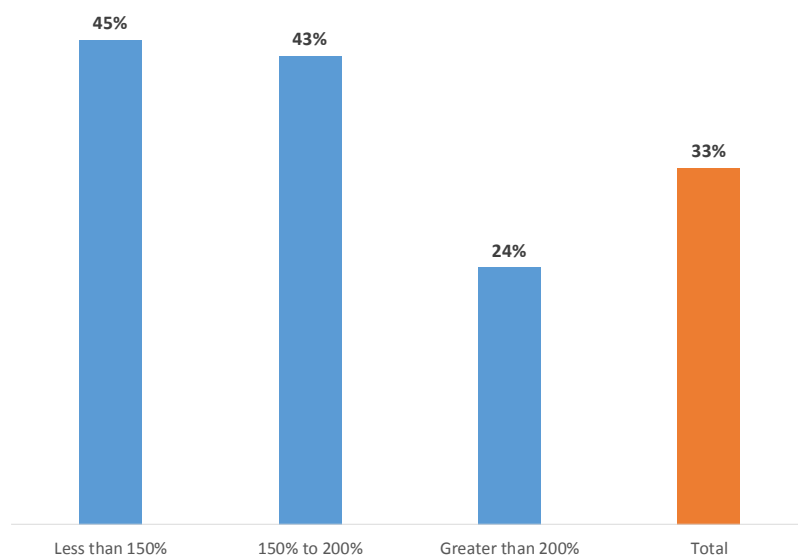


Figure 5 below shows similar breakdowns by state; in California, for example, Mexican-origin LPRs are about half of the eligible-to-naturalize but nearly two-thirds of those working poor who will be eligible for the partial waiver. In Texas, Mexican-origin LPRs are about two-thirds of the eligible-to-naturalize adults but 75 percent of those in the proposed partial waiver category. Of course, in states (such as New York and Florida) where Mexicans are a small share of the eligible-to-naturalize, they are also a small share of those in the partial waiver category; in these states, other groups will likely be the target of outreach.

Figure 5 - Share of Mexican-Origin Eligible-to-Naturalize Adults by State, 2010-2014

<i>State</i>	<i>As Share of ETN Adult Population</i>	<i>As Share of ETN Adult Population At or Below 150% Poverty</i>	<i>As Share of ETN Adult Population Between 151-200% Poverty</i>
Alabama	32%	46%	42%
Alaska	6%	6%	13%
Arizona	65%	79%	74%
Arkansas	45%	57%	49%
California	52%	64%	64%
Colorado	49%	67%	63%
Connecticut	4%	8%	6%
Delaware	14%	24%	12%
District of Columbia	2%	5%	1%
Florida	6%	9%	7%
Georgia	27%	40%	40%
Hawaii	1%	2%	3%
Idaho	56%	72%	61%
Illinois	46%	60%	60%
Indiana	37%	53%	46%
Iowa	32%	44%	51%
Kansas	49%	68%	62%
Kentucky	16%	25%	19%
Louisiana	14%	21%	13%
Maine	1%	3%	1%
Maryland	4%	7%	6%
Massachusetts	1%	1%	1%
Michigan	15%	24%	23%
Minnesota	19%	26%	29%
Mississippi	26%	42%	27%
Missouri	19%	34%	30%
Montana	10%	-	-
Nebraska	43%	57%	59%
Nevada	48%	59%	53%
New Hampshire	3%	5%	9%
New Jersey	5%	9%	7%
New Mexico	79%	90%	85%
New York	5%	6%	7%
North Carolina	30%	44%	40%
North Dakota	7%	-	-
Ohio	11%	16%	16%
Oklahoma	52%	68%	59%
Oregon	43%	58%	55%
Pennsylvania	7%	9%	10%
Rhode Island	2%	1%	1%
South Carolina	25%	41%	29%
South Dakota	15%	-	-
Tennessee	25%	40%	32%
Texas	66%	79%	75%
Utah	39%	50%	49%
Vermont	2%	-	-
Virginia	5%	8%	11%
Washington	27%	42%	43%
West Virginia	11%	-	-
Wisconsin	33%	45%	47%
Wyoming	50%	-	-
Total U.S.	33%	45%	43%

Notes:

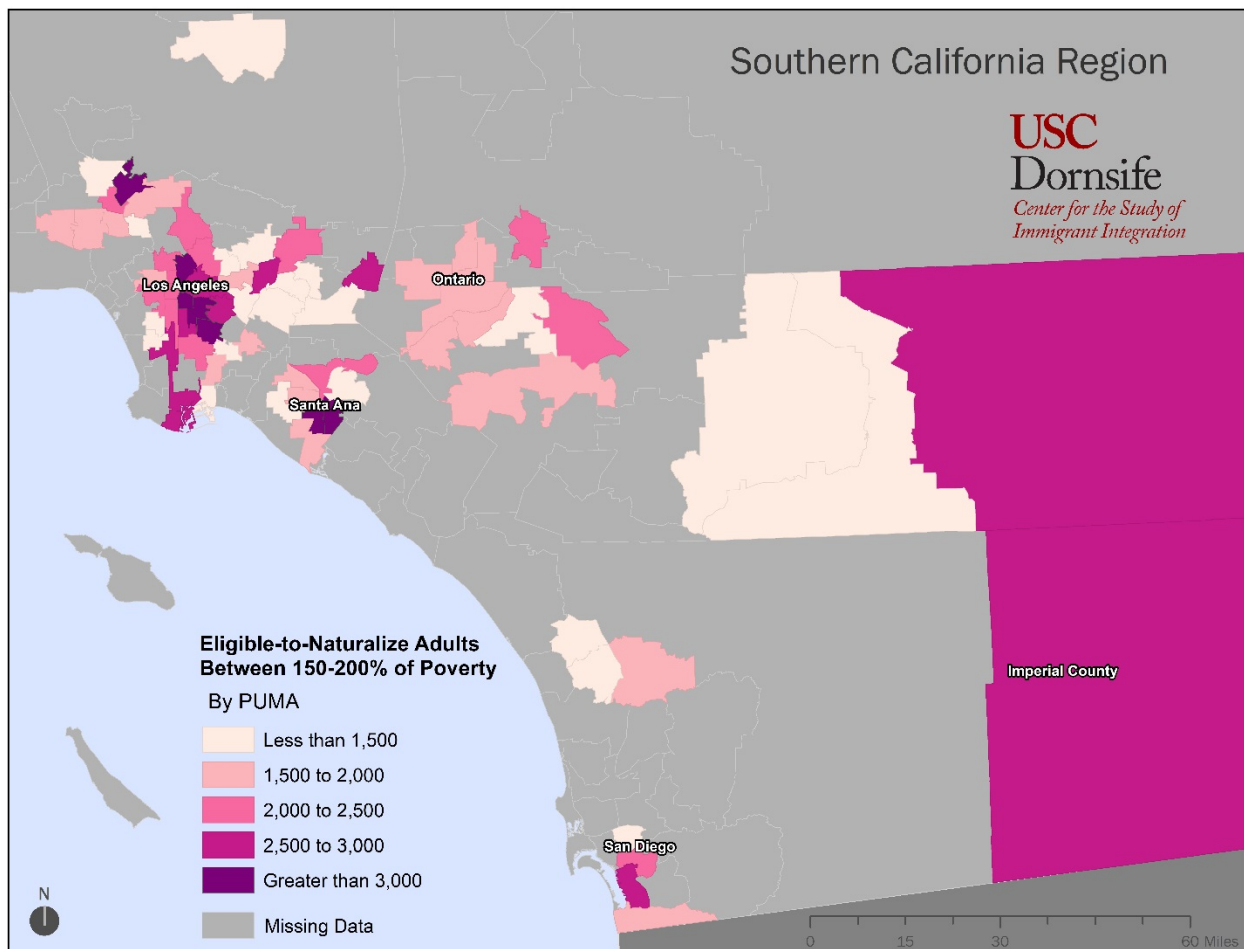
Source: USC Center for the Study of Immigrant Integration (CSII) analysis of a pooled sample of the 2010 through 2014 American Community Survey (ACS) microdata accessed from the Integrated Public Use Microdata Series (IPUMS).
Total populations are restricted to only for whom poverty status is determined.

MAPPING PARTIAL WAIVER ELIGIBLE-TO-NATURALIZE

In order for the proposed partial fee waivers to become an effective tool for furthering naturalization, it must be applied and incorporated into the ongoing on-the-ground strategy of outreach efforts. To assist those efforts, we provide maps below that display our estimates of partial fee waiver eligible adults at the PUMA level (a PUMA, explained in the appendix, is a geographic category utilized by the Census which contains at least 100,000 people and so allows us to explore sub-metro and often sub-county patterns). We focus on four areas across the country with largest populations of partial waiver eligibility.

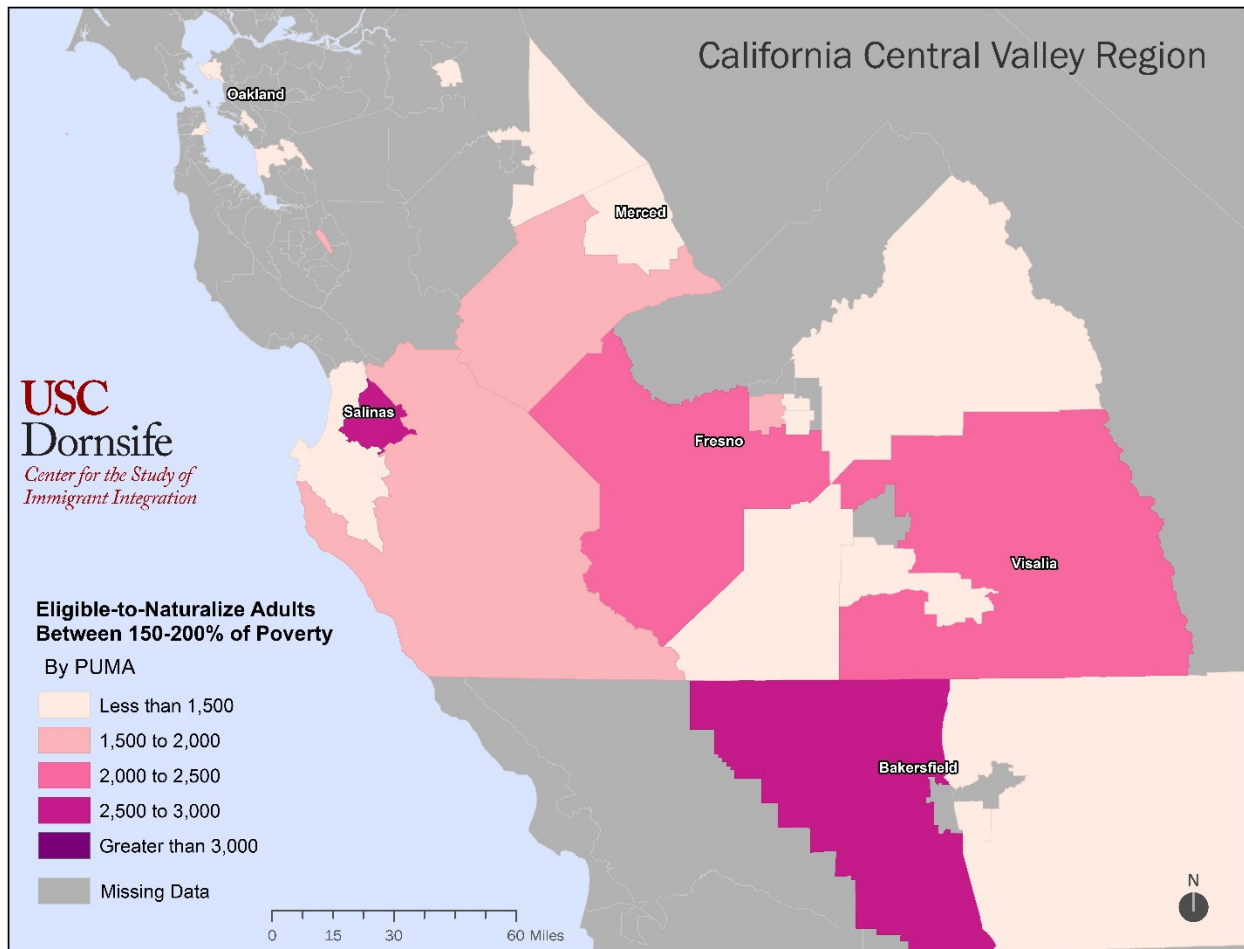
First, the Southern California region is certainly the most densely populated area for partial waiver individuals in the country. Figure 6 shows high populations in Los Angeles City, particularly its southeast section and adjacent suburbs. In addition, to its farther reaching suburbs of Ontario and Santa Ana in Orange County. Imperial County and southern San Diego also are key areas of potential take-up.

Figure 6 - Eligible-to-Naturalize Adults between 150-200% FPL, Southern California, 2010-2014



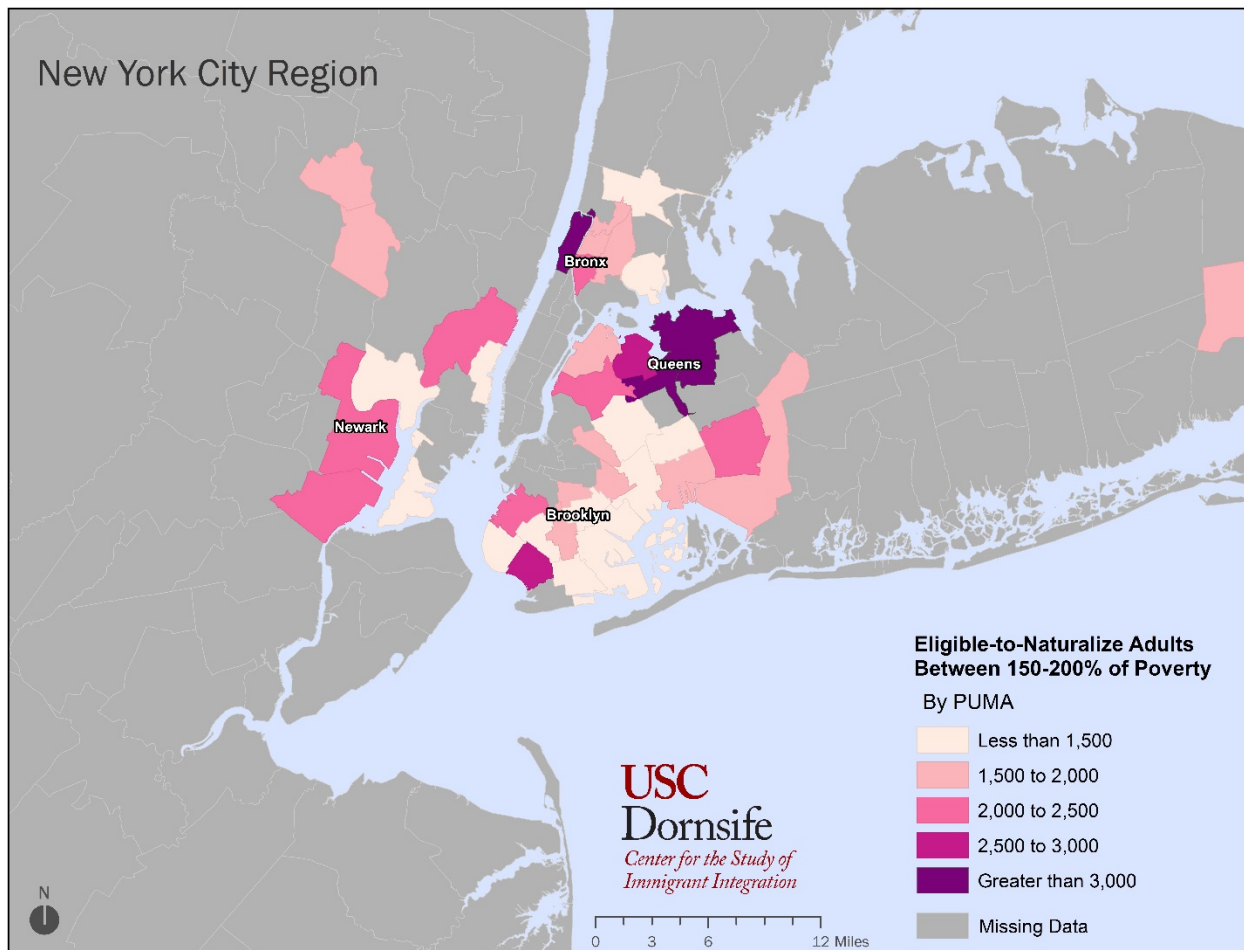
Also in California but further north, the state's Central Valley region, as seen in Figure 7, is comprised of many adults who could take advantage the partial fee waiver. The agricultural communities of Salinas, Fresno, Visalia, and Bakersfield have long been locations of immigrant organizing, including strong efforts to promote naturalization.

Figure 7 - Eligible-to-Naturalize Adults between 150-200% FPL, Central Valley, 2010-2014



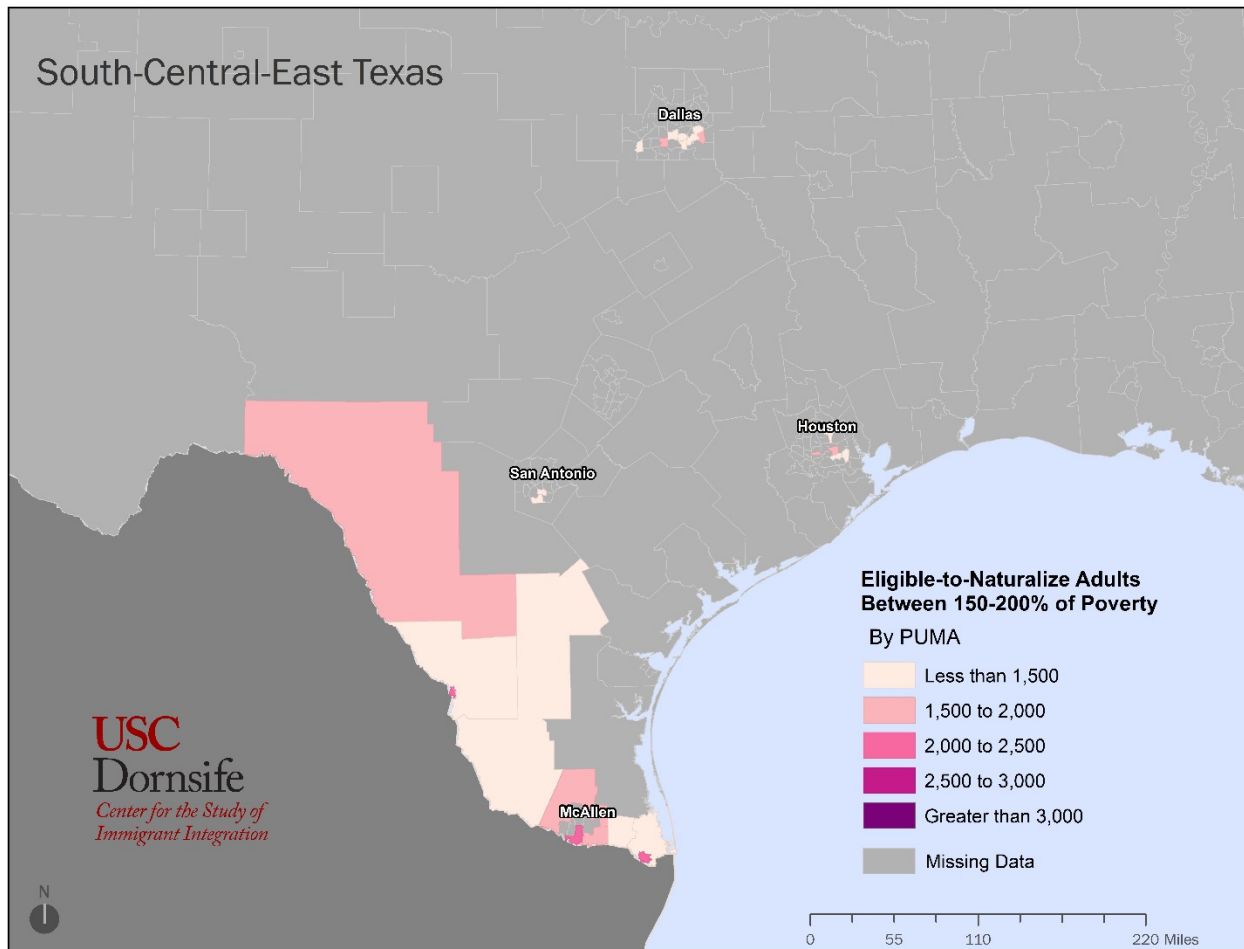
On the east coast, in the New York City region in Figure 8, we see the outer boroughs with the largest number of those in the partial waiver category. As might expected Manhattan is nearly devoid of eligible populations; the dynamics of spatial segregation by income are such that the work poor are priced out and instead sections of Queens and the Bronx are the areas of the greatest concentration of the partial waiver population.

Figure 8 - Eligible-to-Naturalize Adults between 150-200% FPL, New York City region, 2010-2014



And finally, Texas, the other large state of eligibility, the border cities and towns next to Mexico, along with some established communities in the Dallas and Houston areas standing out for particular areas of promotion.

Figure 9 - Eligible-to-Naturalize Adults between 150-200% FPL, South-Central-East Texas region, 2010-2014



CONCLUSION

Naturalization brings economic and civic benefits—and with new partial fee waivers, 12 percent of the nation’s eligible-to-naturalize adults are better able to break through the cost barrier and we as a nation are better-positioned to realize those potential gains. To make sure these gains are realized, we will need continuing action at several levels.

First, USCIS should insure that the new partial waiver is widely publicized; naturalization-promoting organizations such as NALEO, NCLR, and Asian Americans Advancing Justice can help get out the word as can ethnic media outlets. Local governments can play a role as well; a bipartisan, multisector strategy to promote citizenship has also been launched by Cities for Citizenship, co-chaired by Mayors Bill de Blasio, Rahm Emanuel, and Eric Garcetti, and it and other efforts such as Welcoming America can be engaged.

Second, we need to realize that confronting price sensitivity is the first step; making sure that the immigrant population is not just aware of the change but also able to acquire the English and civics history skills that will allow them to pass the test is equally important. Here again there is a role for many of the civic organizations noted above to provide assistance – and for that, they will need the support of foundations and others.

But this is not just the responsibility of those who have generally advocated for immigrant interests. After all, research has shown the economic gains from naturalization that can accrue to not just immigrants but metro areas (Enchautegui and Giannarelli 2015; Pastor and Scoggins 2012). And it’s not just economic: in a country of immigrants, low naturalization rates among some of the largest immigrant populations undermines their representation and threatens to degrade the quality of our governments and institutions.

It is our American duty—enshrined in our nation’s founding documents—to promote and support the citizenship and civic participation of all those who are eligible are eligible to participate. Citizenship deterred—whether by the prohibitive cost or other barriers— is democracy denied. And it is heartening to see USCIS begin to address the myriad obstacle that stand in the way of a fuller American democracy.

METHODOLOGY

Unless otherwise noted, all estimates and data presented in this paper are based on analysis by the USC Center for the Study of Immigrant Integration (CSII) of a pooled sample of the 2010-2014 American Community Survey (ACS) microdata accessed from the Integrated Public Use Microdata Series (IPUMS) (Ruggles et al. 2015). In order to estimate who in the ACS microdata may be eligible to naturalize, we first generated individual assignments of undocumented status.

To do so, we adopted an increasingly common strategy that involves two steps (Capps et al. 2013; Warren 2014). The first step entails determining who among the non-citizen population is least likely to be unauthorized due to a series of conditions that are strongly associated with documented status—a process called “logical edits” (Warren 2014). The second involves sorting the remainder into authorized and unauthorized status based on a series of probability estimates applied to reflect the underlying distribution of probabilities. Our particular choices in both steps is explained in more detail in Pastor, Jawetz, and Ocampo (2015).

With individual assignments of undocumented status in place, the remainder are assumed to be documented. Nearly all but not all of these individuals are Legal Permanent Residents (LPRs); for example, students who are in the U.S. are here legally but they are not LPRs and so we use a conditional edit process to shrink down to the LPRs. Thus, to calculate the eligible-to-naturalize LPR population, we

excluded certain groups, like those likely to be holding student visas, and followed the general guidelines of citizenship eligibility for LPRs to the extent possible given data available in the IPUMS ACS.

Individuals are deemed eligible to naturalize if they meet certain conditions. The basic one is being in the U.S. for more than five years (or three years if married to a U.S. citizen); following the requirements, we also apply a series of other cuts, excluding those who are otherwise eligible but lived abroad or just got married to a U.S. citizen last year (the three-year condition requires three years of marriage), and also acknowledging the accelerated path for those who have served in the U.S. military.

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