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Statement of Boundless Immigration Inc. Submitted to the Immigration and Citizenship Subcommittee of the U.S. House of Representatives Committee on the Judiciary July 16, 2019

"Policy Changes and Processing Delays at U.S. Citizenship and Immigration Services"

Boundless Immigration Inc. submits this statement for the record to provide the House Judiciary Subcommittee on Immigration and Citizenship with data relevant to its July 16, 2019 hearing on "Policy Changes and Processing Delays at U.S. Citizenship and Immigration Services." Boundless is Seattle-based technology company that empowers families to navigate the immigration system more confidently, rapidly, and affordably.

This statement includes sections on the following topics:

I. National average processing times	l
II. Naturalization processing times	
III. Family-based immigration processing times	
IV. Processing times by USCIS field office	
V. Processing times by Congressional District	

I. National average processing times have increased dramatically over the past 2.5 years.

According to <u>USCIS data</u>, the national average processing time for many important immigration benefits has nearly doubled since FY15—and even quadrupled, in the case of U visas for victims of domestic abuse and other crimes, who must now wait *nearly four years*.

Form	Purpose	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019 (Q1-Q2)	Increase since FY15
N-400	Naturalization	5.8	5.6	8.1	10.3	10.1	74.1%
I-485	Employment-based green card	6.5	6.8	8.1	11.1	12.3	89.2%
I-485	Family-based green card	6.6	6.8	8.4	11.1	11.7	77.3%
I-914	T visa for victims of human trafficking	6.4	7.9	9	11.4	14.9	132.8%
I-918	U visa for victims of domestic abuse and other crimes	11.4	22.1	32.1	40.6	43.9	285.1%

II. Naturalization

(The following content is excerpted from <u>The State of New American Citizenship</u>, a report by Boundless first published on February 4, 2019.)

Nearly 9 million immigrants in the United States are lawful permanent residents (green card holders) currently eligible to apply for U.S. citizenship.

<u>Naturalization</u>—the process by which an immigrant becomes a U.S. citizen—brings considerable economic benefits at the individual, regional, and national levels. <u>Naturalized immigrants earn 8-11% more</u> in annual income than non-naturalized immigrants (controlling for variables such as skills, education, and fluency in English), suggesting that naturalization leads to better-paying jobs by signaling to employers that a given immigrant has strong English language skills and a long-term commitment to live and work in the United States.

One study of 21 U.S. cities found that if all eligible immigrant residents were to naturalize, their aggregate income would increase by \$5.7 billion, yielding an increase in homeownership by over 45,000 people and an increase in tax revenue of \$2 billion. Nationally, if half of the eligible immigrant population of the United States naturalized, the increased earnings and demand could boost GDP by \$37-52 billion per year.

But <u>barriers</u> to becoming a U.S. citizen have gotten worse over time, and are not evenly distributed across the country.

The national trends are worrisome:

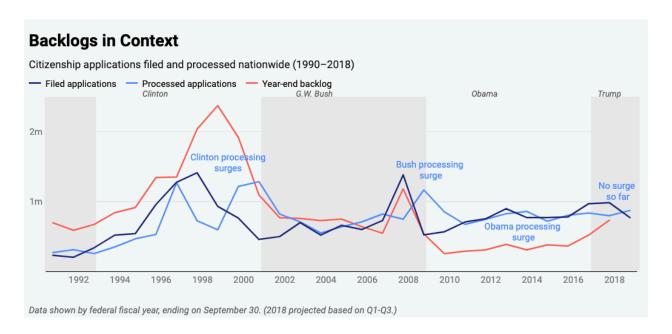
- The <u>processing time</u> for a citizenship application has surged over the past 2 years to over 10 months—double the processing time between 2012 and 2016.
- These processing times are almost sure to keep rising, because the government has not kept pace with the volume of incoming applications. After a 2-year spike in 2016–2017, the volume of citizenship applications returned to a typical level in 2018—but the government's backlog processing efficiency remains at the lowest level in a decade.
- The likelihood that a citizenship application will be denied has risen slightly over the past few years.

The volume of citizenship applications does fluctuate from year to year, typically spiking during election years—or in advance of an application fee increase—and then decreasing sharply the

following year. In 2016 and 2017, something unusual happened: Volume spiked at nearly 1 million applications for 2 years in a row.

Although application volume was on track to reach a more normal level in 2018, processing volume has been more or less flat for the past 3 years, leading to a surge in the backlog of pending applications.

U.S. Citizenship and Immigration Services (USCIS), the federal agency responsible for processing citizenship applications, has defended itself by noting that the backlog more than doubled during the Obama administration. This is true: the backlog rose from nearly 292,000 in September 2010 to over 636,000 by the time Donald Trump assumed office in January 2017. But USCIS has also claimed that the surge in applications during 2016 and 2017 created a "record and unprecedented" workload, and a look at the past 3 decades shows that this is likely not true.



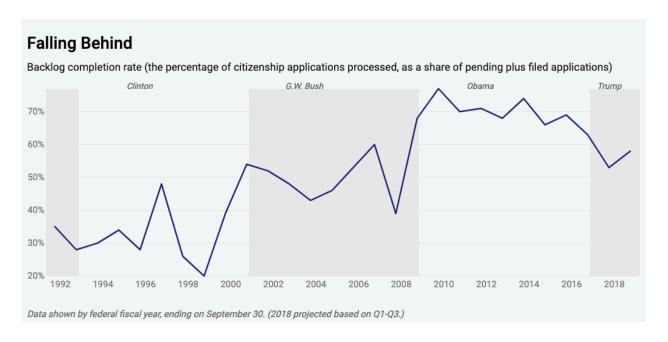
In 2007, citizenship applications surged to nearly 1.4 million, far higher than the recent uptick. This was driven in part by a looming 80% application fee hike that year, and in part by an increase in newly eligible immigrants who had obtained their green cards 5 years earlier under the Legal Immigration Family Equity (LIFE) Act of 2000.

USCIS responded with a surge in processing volume the following year, and the backlog plunged to a 30-year low of about 257,000 in 2009.

In the mid-1990s, there was a truly "record and unprecedented" surge in citizenship applications, driven in part by a corresponding increase in newly eligible immigrants who had received green cards under the Immigration Reform and Control Act 1986 (IRCA, also known as the "Reagan Amnesty"). Between 1995 and 1998, application volume stayed well above 900,000, peaking at over 1.4 million in 1997. Although the backlog initially shot past 2 million in 1997-1998, USCIS responded with a comparable surge in processing volume that appears to have tamed the backlog by 1999–2000.

The data indicate that when USCIS devotes sufficient resources to a citizenship application surge, it's possible to dramatically reduce a backlog within one year. That's what happened in 2012, 2007, and 2000.

On the other hand, when USCIS fails to devote sufficient resources, backlogs can get way out of hand. That's what happened in the mid-1990s, and it appears to be happening now, as well.



Another way to evaluate this problem is to measure how efficiently USCIS beats back its backlogs. If USCIS processed every citizenship application it received in a given year, plus the applications that were pending from the previous year, that would yield a "backlog completion" of 100%.

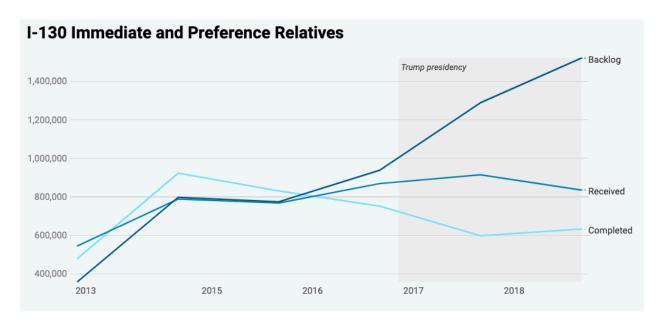
In reality, USCIS achieved a backlog completion rate of 77% in 2009—a 30-year high—and this number has been trending downward ever since. There was a 10-point drop in backlog completion between 2016 and 2017 (from 63% to 53%), and 2018 isn't likely to show dramatic improvement. This is the opposite trend of what's necessary to reduce the current backlog of citizenship applications.

III. Family-based immigration

(The following content is excerpted from <u>Top 10 Surprising Facts About Family-Based</u> <u>Immigration</u>, a report by Boundless to be published on July 17, 2019.)

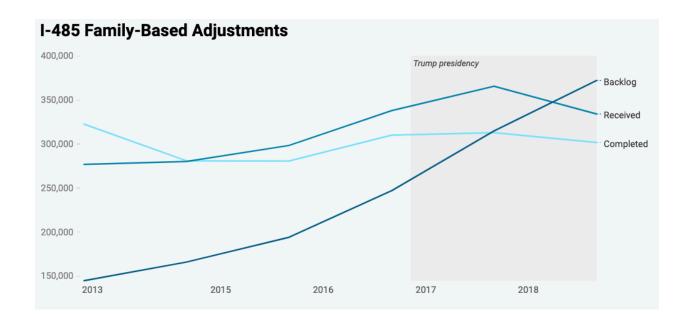
The family immigration process begins when a U.S. citizen or permanent resident "petitions" the government to sponsor a family member for a green card. This requires filing a special form (called an "I-130") with U.S. Citizenship and Immigration Services (USCIS).

In 2015 and 2016, it took USCIS about 6 months to complete this first step. So far this year, the <u>average processing time</u> has increased to over 10 months. During that time, the backlog has ballooned from some 775,000 to over 1.5 million pending cases—even though the volume of incoming cases has been more or less steady.



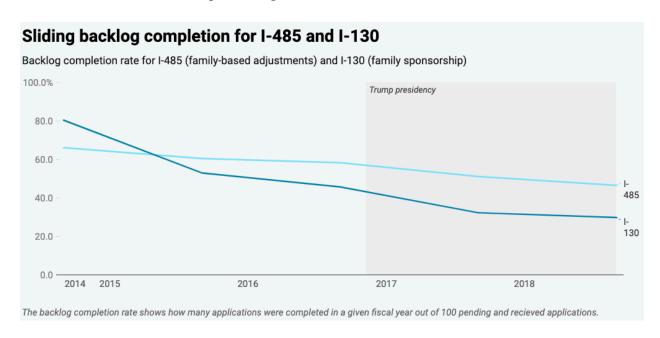
A similar pattern is evident in the next step for family-sponsored immigrants already living in the United States, which is to submit a formal application to "adjust status" from a temporary visa to a green card. This requires filing a different form (called an "<u>I-485</u>") with USCIS, and here again the trends are troubling.

In 2015 and 2016, it took USCIS a bit over 6.5 months to complete this step. So far this year, the <u>average processing time</u> has increased to nearly 12 months. During that time, the backlog has shot up from some 194,000 to 372,000 pending cases—again, even though the volume of incoming cases has been more or less steady.



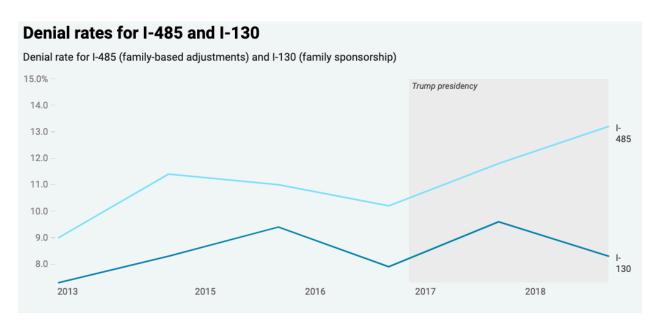
Another way to visualize this problem is to measure how efficiently USCIS deals with its backlogs. If USCIS processed every green card application it received in a given year, plus the applications that were pending from the previous year, that would yield a "backlog completion rate" of 100%.

In reality, USCIS achieved a backlog completion rate of 66% in 2014 for I-485s, dropping to 47% last year. The change is even more precipitous for I-130s, with a backlog completion rate of 80% in 2014 that dipped below 30% last year. In both cases, this slide began before the Trump administration, but the trend has accelerated, and now USCIS isn't even treading water. This does not bode well for future processing times.



Another troubling trend concerns how often a family-sponsored green card applicant is approved for permanent residency. While the denial rate for family sponsorship petitions (I-130) shows no clear trend over the past six years, the denial rate for actual green card applications (I-485) shows signs of a sharp uptick.

While 9% of family-sponsored green card applications were denied by USCIS in 2014, last year the denial rate was 13.2%—a nearly 50% jump resulting in some 14,000 extra denials per year.



IV. Processing times vary dramatically among local USCIS field offices.

When USCIS requires an in-person interview, the applicant must travel to a particular USCIS field office based on their home ZIP code.

Because processing times vary so widely among USCIS field offices, this means that individuals in some places face wait times up to five times higher than in other places. (See the <u>full chart</u> below for more details.)

According to <u>The State of New American Citizenship</u> (published in Feb. 2019), becoming a U.S. citizen is much harder in some places than others:

- Immigrants in some cities face citizenship application wait times 4–5 times higher than in other cities.
- Immigrants in some cities experience a citizenship application denial rate two times higher than the national average.
- Some cities have four or five government field offices where immigrants can attend their citizenship interviews; other cities have none and make immigrants travel over 150 miles to the nearest field office.

New rankings reveal the best and worst places to become a U.S. citizen:

- The top 3 best overall metro areas for immigrants to become U.S. citizens are Cleveland, Ohio; Riverside, California; and Louisville, Kentucky.
- The worst 3 metro areas for immigrants to become U.S. citizens are all in Texas: Austin, Houston, and Dallas.
- The top 3 government offices handling citizenship applications most efficiently are in Cleveland, Ohio; Providence, Rhode Island; and Raleigh, North Carolina.
- The worst 3 government offices handling citizenship applications least efficiently are in St. Paul, Minnesota; Miami, Florida; and Houston, Texas. The maximum wait time in the St. Paul office is now almost 2 years.
- The top 3 metro areas with the highest naturalization rate of eligible immigrants are Columbus and Cincinnati, Ohio; and Pittsburgh, Pennsylvania.
- The worst 3 metro areas with the lowest naturalization rate are Fresno, California; Phoenix, Arizona; and Dallas, Texas.

According to <u>Top 10 Surprising Facts About Family-Based Immigration</u> (published in July 2019), some USCIS field offices have gotten faster at processing family-sponsored green card applications over the past year. In cities like Jacksonville, FL and Albuquerque, NM, the local median processing time has dropped from 10.5 months to just 6 months since this time last year.

But such bright spots are in the minority. Because processing times vary so widely among USCIS field offices, family-sponsored green card applicants in some places face wait times more than *three times longer* than in other places, for no apparent reason.

The field office in New York City has the most discouraging numbers, compelling most green card applicants to wait 21 months, up to a near-maximum of 36 months.

USCIS processing times (in months) as of July 2019

Median: The time it takes to complete 50% of cases for a given form within a given field office, as estimated by USCIS.

Near-max: The time it takes to complete 93% of cases for a given form within a given field office, as estimated by USCIS.

Field Office	Code	N-400 (citizenship)		I-485 (family- based)		l-485 (employer- based)	
		Median	Near-max	Median	Near-max	Median	Near-max
Anchorage AK	ANC	10.0	18.0	11.0	25.0	12.5	24.5
Montgomery AL	MGA	9.0	20.5	11.0	25.0	12.5	24.5
Fort Smith AR	FSA	10.0	18.0	11.0	25.0	12.5	24.5
Phoenix AZ	РНО	14.5	20.5	19.0	22.0	12.5	24.5
Tucson AZ	TUC	5.5	13.5	6.5	15.5	12.5	24.5
Fresno CA	FRE	6.5	9.5	6.5	15.5	12.5	24.5
Imperial CA	IMP	10.0	18.0	11.0	25.0	12.5	24.5
Los Angeles CA	LOS	9.5	15.0	10.5	18.5	12.5	24.5
Los Angeles County CA	LAC	10.5	13.0	11.5	17.5	12.5	24.5
Sacramento CA	SAC	9.5	14.0	9.0	17.5	12.5	24.5
San Bernardino CA	SBD	5.5	9.0	6.5	17.5	12.5	24.5
San Diego CA	SND	7.0	11.5	7.5	19.5	12.5	24.5
San Fernando Valley CA	SFV	14.5	16.0	16.0	18.5	12.5	24.5
San Francisco CA	SFR	14.5	17.0	18.0	21.0	12.0	18.0
San Jose CA	SNJ	10.5	13.0	11.0	23.5	12.0	18.0
Santa Ana CA	SAA	13.0	15.5	12.5	21.0	12.5	24.5
Denver CO	DEN	9.5	21.0	7.5	23.5	12.5	24.5
Hartford CT	HAR	10.5	20.0	10.5	25.0	12.5	24.5
Washington DC	WAS	8.5	14.0	10.5	24.5	12.5	24.5
Fort Myers FL	OFM	12.5	19.0	11.0	25.0	12.5	24.5
Hialeah FL	HIA	6.0	11.0	12.5	26.5	12.5	24.5
Jacksonville FL	JAC	5.0	12.0	6.0	13.0	12.5	24.5
Kendall FL	KND	4.0	11.0	11.5	27.5	12.5	24.5

Miami FL	MIA	9.5	15.0	11.0	25.0	12.5	24.5
Oakland Park FL							
	OKL	14.0	18.5	18.0	25.0	12.5	24.5
Orlando FL	ORL	9.0	21.0	12.0	25.0	12.5	24.5
Tampa FL	TAM	4.0	11.0	7.0	18.0	12.5	24.5
West Palm Beach FL	WPB	7.5	16.0	8.0	18.0	12.5	24.5
Atlanta GA	ATL	12.0	22.5	9.5	20.5	12.5	24.5
Agana GU	AGA	10.0	18.0	11.0	25.0	12.5	24.5
Honolulu HI	HHW	9.5	16.5	11.0	25.0	12.5	24.5
Des Moines IA	DSM	10.5	13.5	11.0	25.0	12.5	24.5
Boise ID	ВОІ	10.0	18.0	11.0	25.0	12.5	24.5
Chicago IL	CHI	8.0	17.0	12.5	38.5	12.5	23.5
Indianapolis IN	INP	6.0	14.5	8.0	21.0	12.5	24.5
Wichita KS	WIC	10.0	18.0	11.0	25.0	12.5	24.5
Louisville KY	LOU	4.5	11.0	11.0	25.0	12.5	24.5
New Orleans LA	NOL	12.5	19.0	11.0	25.0	12.5	24.5
Boston MA	BOS	5.0	10.0	7.0	21.0	12.5	24.5
Lawrence MA	LAW	7.5	13.0	7.5	19.5	12.5	24.5
Baltimore MD	BAL	13.0	25.0	9.5	29.5	12.5	24.5
Portland ME	РОМ	10.0	18.0	11.0	25.0	12.5	24.5
Detroit MI	DET	6.0	11.5	6.5	16.0	11.5	19.0
Minneapolis-St. Paul MN	SPM	14.0	23.5	14.0	29.5	12.5	24.5
Kansas City MO	KAN	5.0	9.5	6.5	20.5	12.5	24.5
Saint Louis MO	STL	6.5	13.0	11.0	25.0	12.5	24.5
Helena MT	HEL	10.0	18.0	11.0	25.0	12.5	24.5
Charlotte NC	CLT	8.0	14.0	7.5	17.0	12.5	24.5
Raleigh NC	RAL	4.0	12.5	6.5	18.5	12.5	24.5
Omaha NE	OMA	8.0	10.5	11.0	25.0	12.5	24.5
Manchester NH	MAN	10.0	18.0	11.0	25.0	12.5	24.5
Mount Laurel NJ	MTL	5.5	11.5	6.5	16.0	12.5	24.5
Newark NJ	NEW	8.0	12.5	9.5	23.0	11.5	19.0
Albuquerque NM	ABQ	10.0	18.0	6.0	12.0	12.5	24.5
Las Vegas NV	LVG	15.5	19.5	13.0	19.0	12.5	24.5

Reno NV	REN	10.0	18.0	11.0	25.0	12.5	24.5
Albany NY	ALB	10.0	18.0	11.0	25.0	12.5	24.5
Brooklyn NY	BNY	13.5	20.0	19.0	23.0	12.5	24.5
Buffalo NY	BUF	5.0	21.5	8.5	22.0	12.5	24.5
Long Island NY	LNY	6.5	11.5	7.5	22.0	12.5	24.5
New York City NY	NYC	13.0	20.5	20.5	36.0	14.0	24.0
Queens NY	QNS	11.0	25.5	7.5	25.5	12.5	24.5
Cincinnati OH	CIN	4.0	8.0	11.0	25.0	12.5	24.5
Cleveland OH	CLE	3.5	11.0	11.0	25.0	12.5	24.5
Columbus OH	CLM	4.5	11.5	11.0	25.0	12.5	24.5
Oklahoma City OK	OKC	5.0	10.0	11.0	25.0	12.5	24.5
Portland OR	POO	6.0	10.0	7.0	19.0	12.5	24.5
Philadelphia PA	PHI	9.0	18.5	11.5	21.0	12.5	24.5
Pittsburgh PA	PIT	5.0	13.5	11.0	25.0	12.5	24.5
San Juan PR	SAJ	10.0	18.0	11.0	25.0	12.5	24.5
Providence RI	PRO	5.0	10.5	11.0	25.0	12.5	24.5
Charleston SC	CHL	3.5	18.5	11.0	25.0	12.5	24.5
Greer SC	GRR	3.0	9.0	11.0	25.0	12.5	24.5
Memphis TN	MEM	9.5	15.0	11.0	25.0	12.5	24.5
Nashville TN	NTN	13.0	17.0	11.0	25.0	12.5	24.5
Dallas TX	DAL	13.5	22.5	14.5	22.0	12.0	21.5
El Paso TX	ELP	6.5	21.0	6.5	16.0	12.5	24.5
Harlingen TX	HLG	9.5	19.0	6.5	18.5	12.5	24.5
Houston TX	HOU	14.0	21.5	15.5	28.5	13.5	22.5
San Antonio TX	SNA	10.0	15.5	7.0	22.0	12.5	24.5
Salt Lake City UT	SLC	14.5	23.0	11.0	25.0	12.5	24.5
Norfolk VA	NOR	9.5	13.0	8.5	20.0	12.5	24.5
Charlotte Amalie VI	CHA	10.0	18.0	11.0	25.0	12.5	24.5
Christiansted VI	CHR	10.0	18.0	11.0	25.0	12.5	24.5
Saint Albans VT	STA	10.0	18.0	11.0	25.0	12.5	24.5
Seattle WA	SEA	15.5	17.5	11.0	25.0	12.0	18.0
Spokane WA	SPO	10.0	18.0	11.0	25.0	12.5	24.5

Yakima WA	YAK	10.0	18.0	11.0	25.0	12.5	24.5
Milwaukee WI	MIL	8.0	15.0	11.0	25.0	12.5	24.5
National Minimum		3.0	8.0	6.0	12.0	11.5	18.0
National Maximum		15.5	25.5	20.5	38.5	14.0	24.5
National Average		9.0	16.0	10.5	23.0	12.5	24.1

V. Processing times are not improving, across many local USCIS field offices.

Boundless recorded the median and near-maximum <u>USCIS processing times</u> for several important form types, each month between July 2018 and July 2019. This allows Members of Congress to see how their constituents are being served over time within their districts. See the charts below for more details.

Unfortunately, as these charts demonstrate, there is scant evidence that these processing times have improved over the past year.

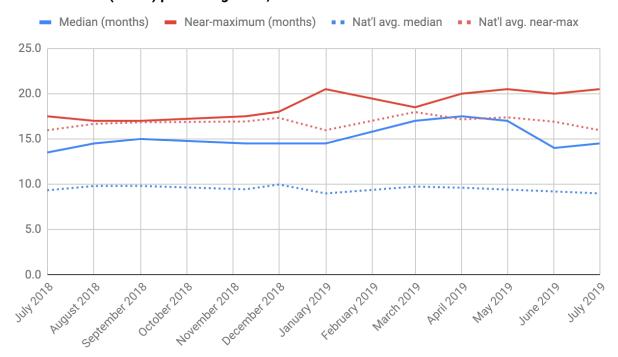
USCIS processing times between July 2018 – July 2019

Congressional District	USCIS field office code
AZ-5; Gilbert	PHO
AZ-8; Phoenix	PHO
CA-4; Truckee, Fresno	FRE
CA-19; San Jose	SNJ
CA-46; Anaheim, Santa Ana	SAA
CO-2; Denver, Boulder, Ft. Collins	DEN
CO-4; Greeley	DEN
FL-17; Sarasota	TAM, OFM
FL-26; Miami	KND, MIA, HIA
<u>ND</u>	SPM
PA-5; Swarthmore	PHI
TX-16; El Paso	ELP
TX-18; Houston	HOU
TX-29; Houston	HOU
WA-7; Seattle	SEA

Median: The time it takes to complete 50% of cases for a given form within a given field office, as estimated by USCIS.

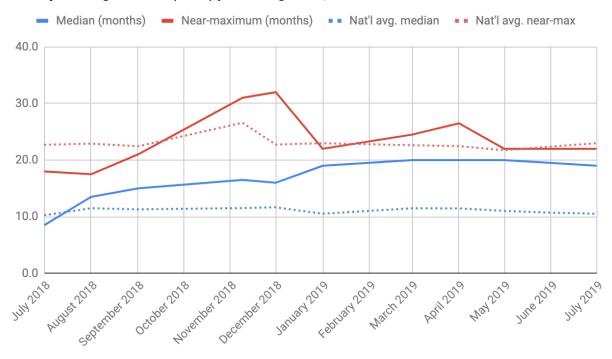
Near-max: The time it takes to complete 93% of cases for a given form within a given field office, as estimated by USCIS.

USCIS field office in Phoenix, AZ

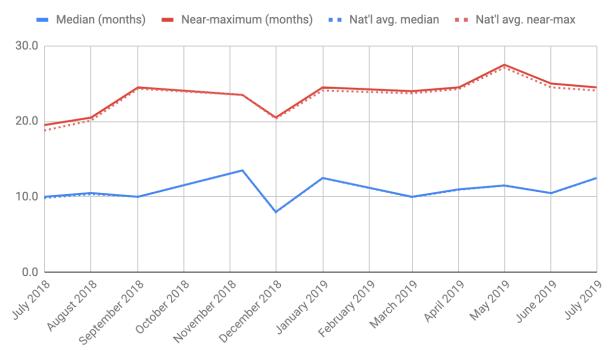


USCIS field office in Phoenix, AZ

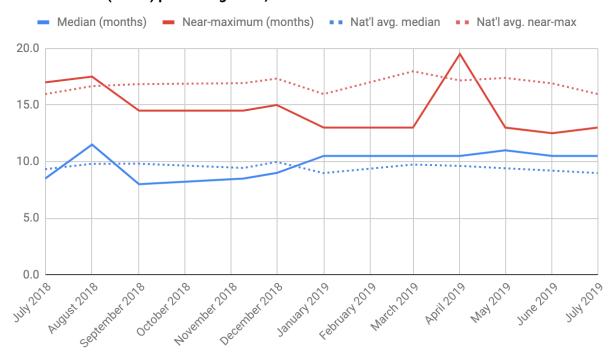
Family-based green card (I-485) processing times, in months



USCIS field office in Phoenix, AZ

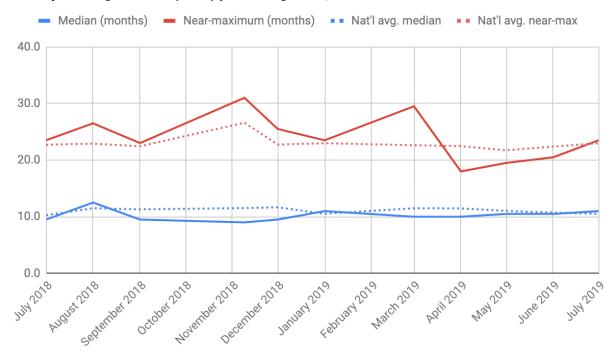


USCIS field office in San Jose, CA

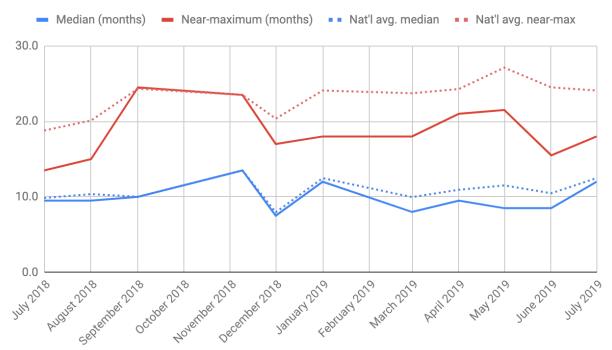


USCIS field office in San Jose, CA

Family-based green card (I-485) processing times, in months

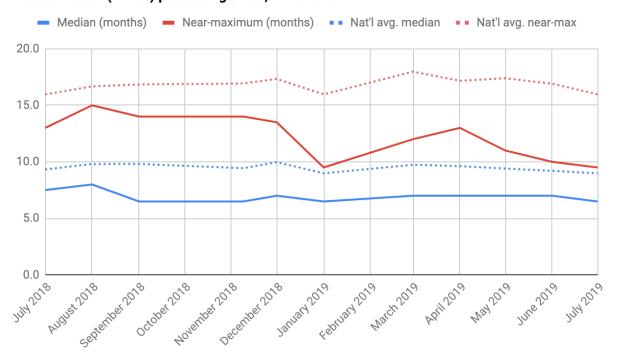


USCIS field office in San Jose, CA



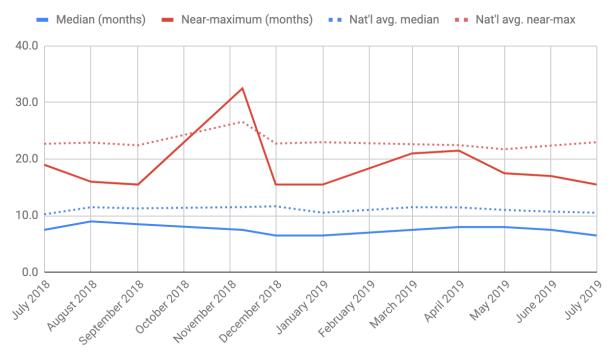
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USCIS field office in Fresno, CA

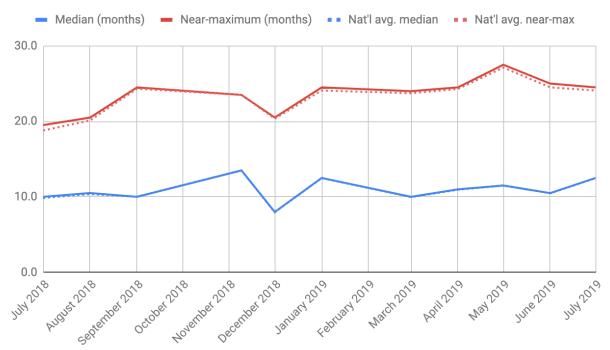


USCIS field office in Fresno, CA

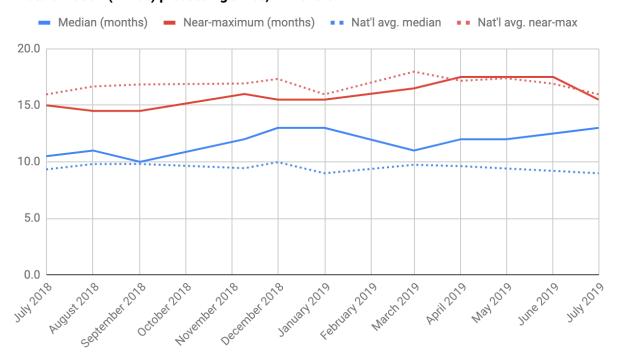
Family-based green card (I-485) processing times, in months



USCIS field office in Fresno, CA

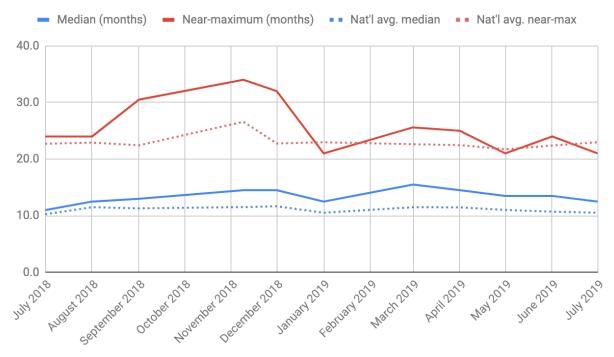


USCIS field office in Santa Ana, CA

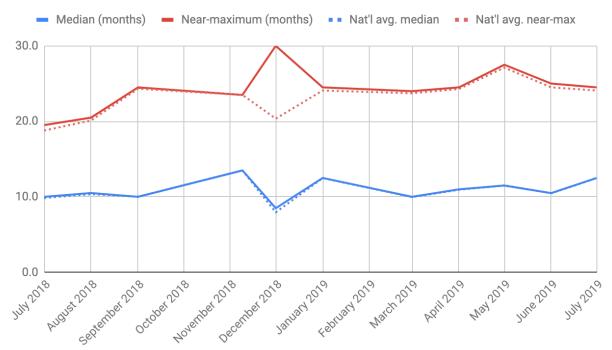


USCIS field office in Santa Ana, CA

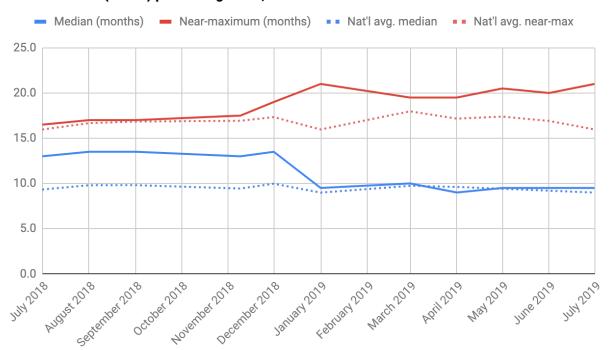
Family-based green card (I-485) processing times, in months



USCIS field office in Santa Ana, CA

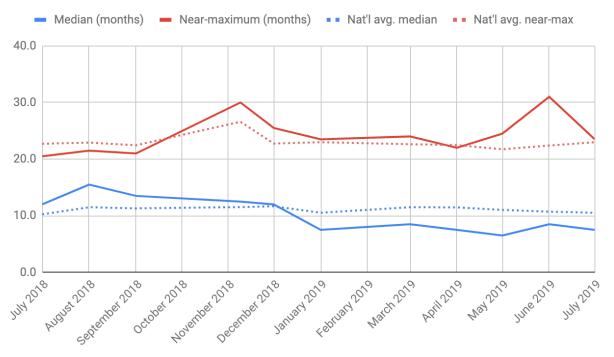


USCIS field office in Denver, CO

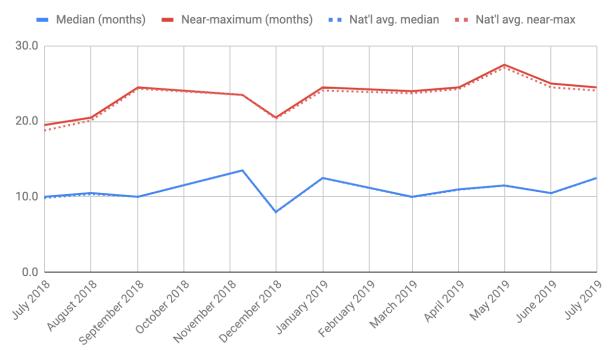


USCIS field office in Denver, CO

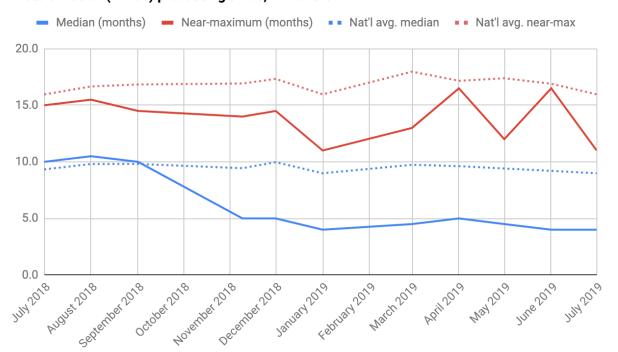
Family-based green card (I-485) processing times, in months



USCIS field office in Denver, CO

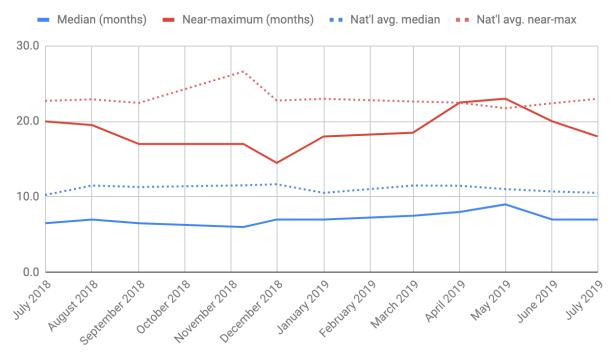


USCIS field office in Tampa, FL

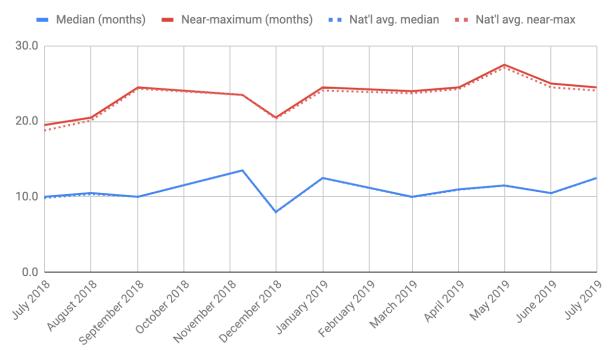


USCIS field office in Tampa, FL

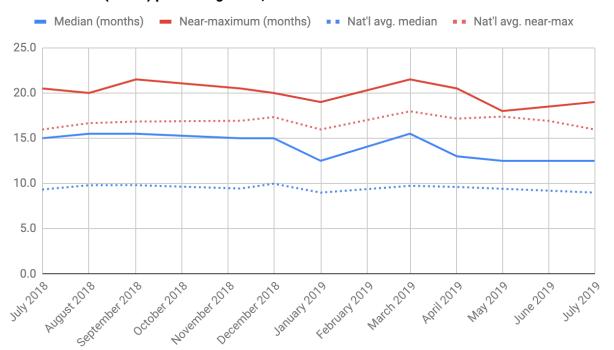
Family-based green card (I-485) processing times, in months



USCIS field office in Tampa, FL

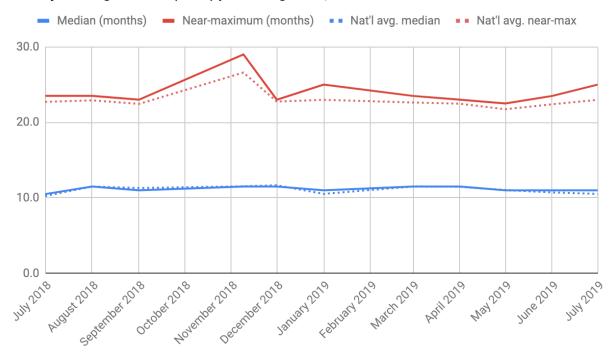


USCIS field office in Fort Myers, FL

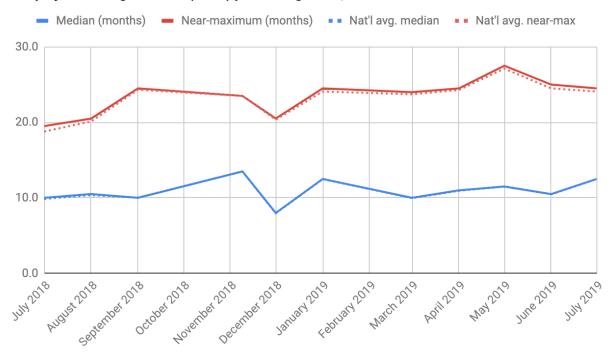


USCIS field office in Fort Myers, FL

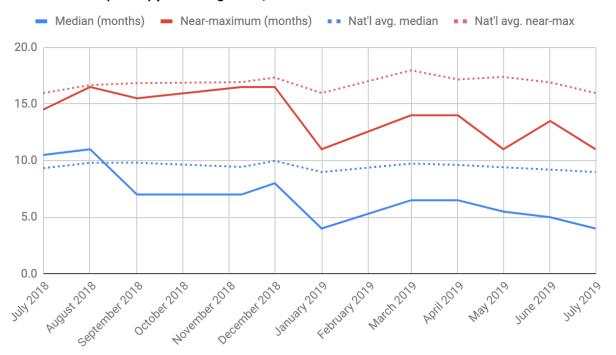
Family-based green card (I-485) processing times, in months



USCIS field office in Fort Myers, FL

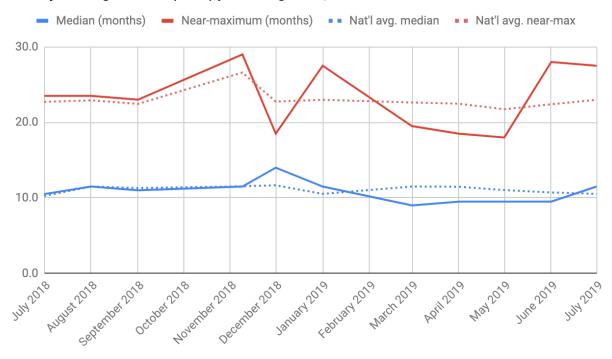


USCIS field office in Kendall, FL

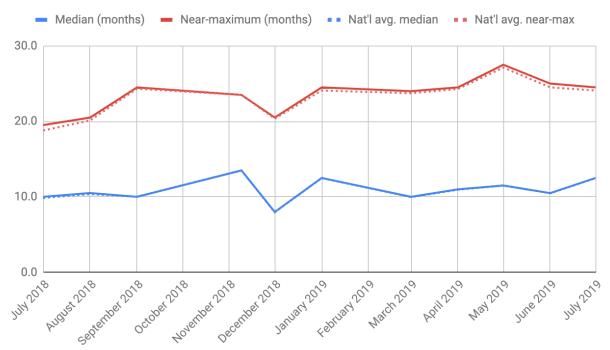


USCIS field office in Kendall, FL

Family-based green card (I-485) processing times, in months



USCIS field office in Kendall, FL

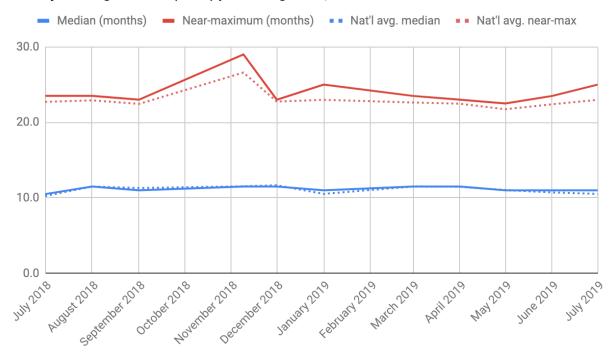


USCIS field office in Miami, FL

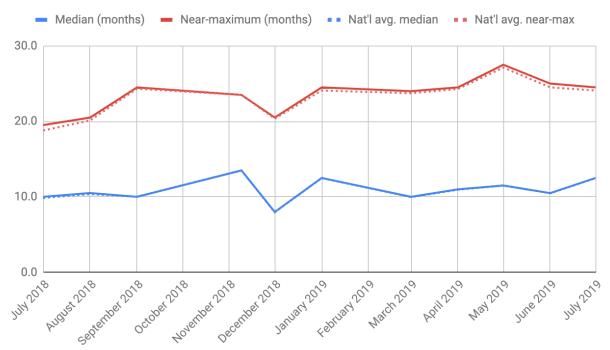


USCIS field office in Miami, FL

Family-based green card (I-485) processing times, in months

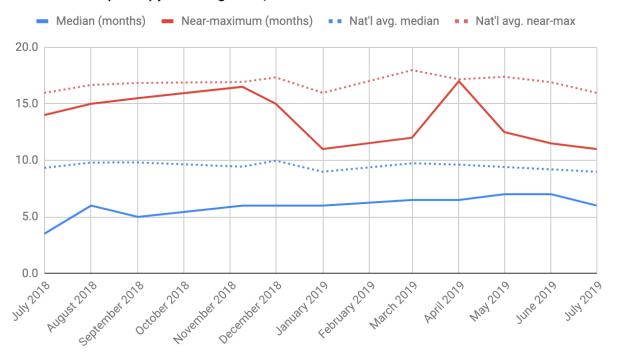


USCIS field office in Miami, FL

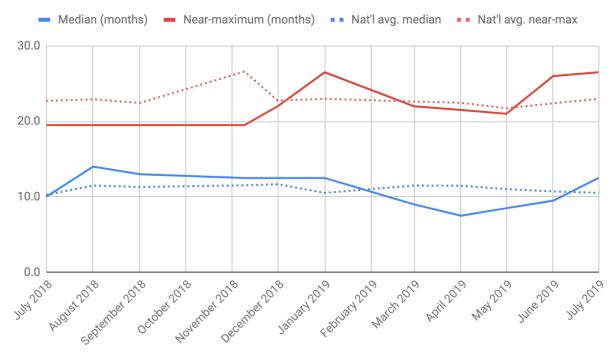


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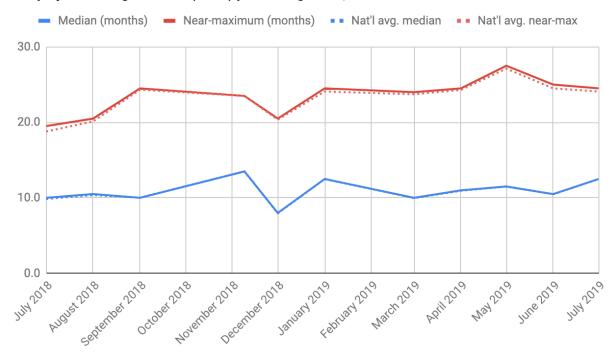
USCIS field office in Hialeah, FL



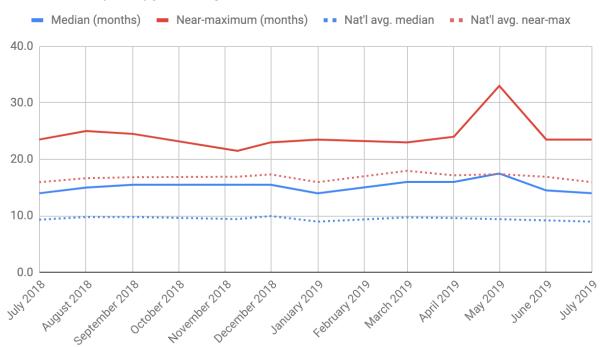
USCIS field office in Hialeah, FL



USCIS field office in Hialeah, FL

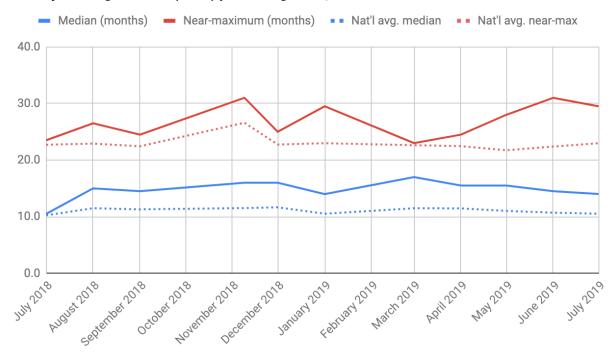


USCIS field office in Minneapolis, MN (serves ND and SD)

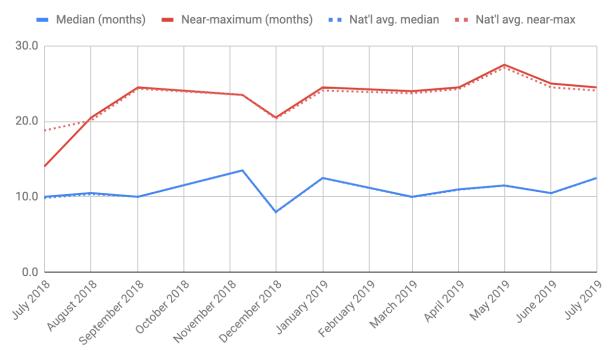


USCIS field office in Minneapolis, MN (serves ND and SD)

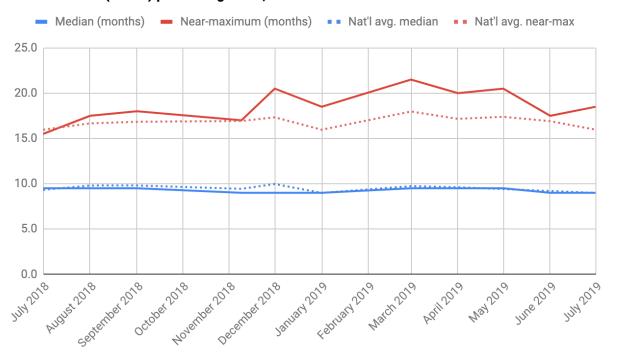
Family-based green card (I-485) processing times, in months



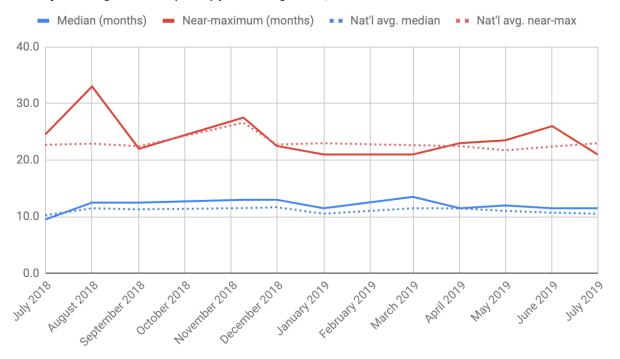
USCIS field office in Minneapolis, MN (serves ND and SD)



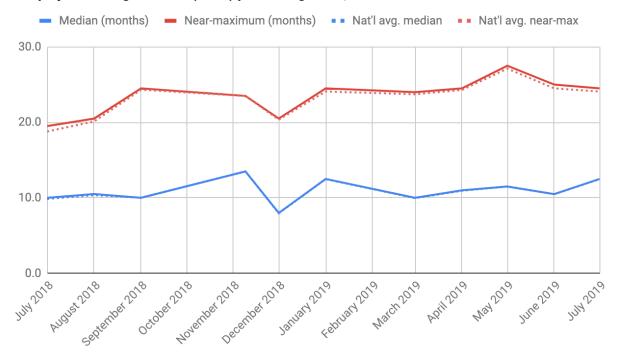
USCIS field office in Philadelphia, PA



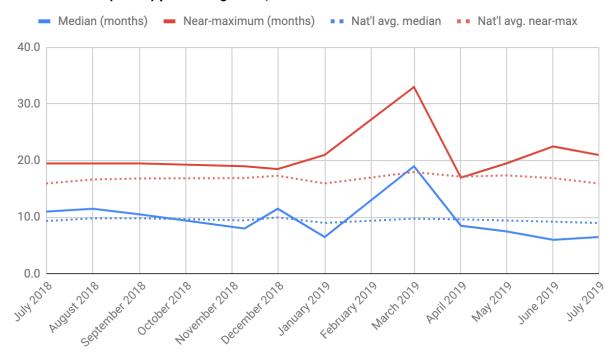
USCIS field office in Philadelphia, PA



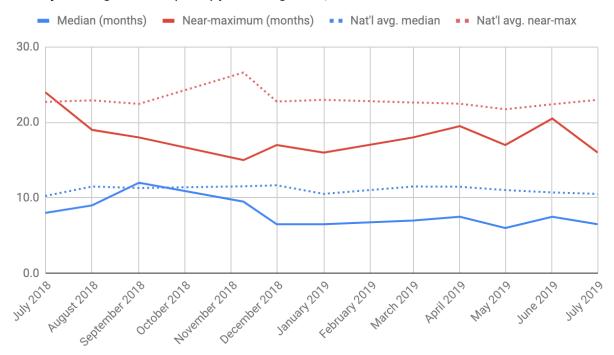
USCIS field office in Philadelphia, PA



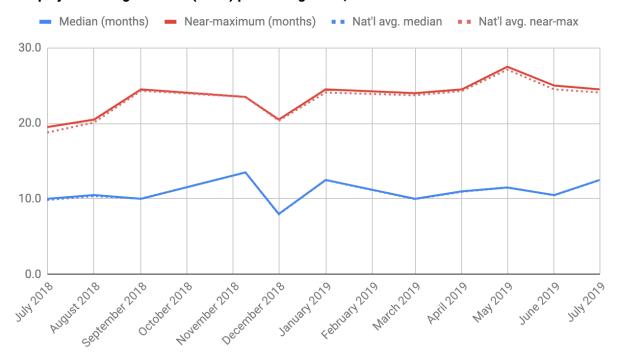
USCIS field office in El Paso, TX



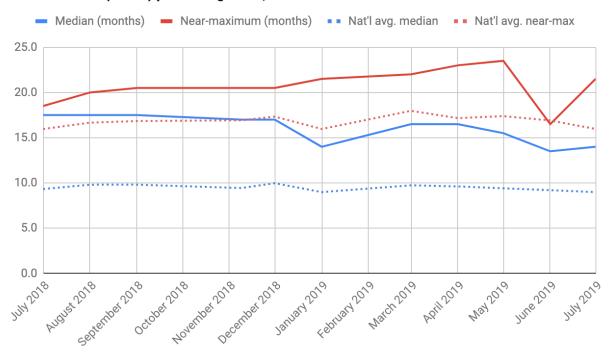
USCIS field office in El Paso, TX



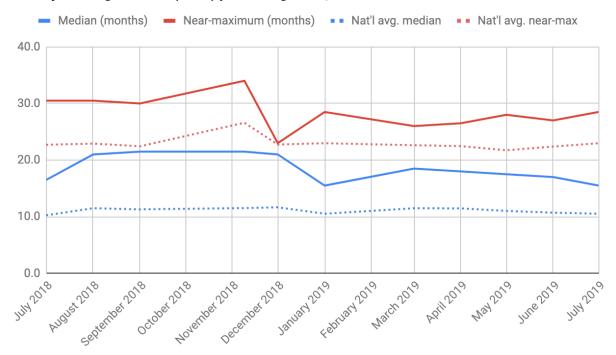
USCIS field office in El Paso, TX



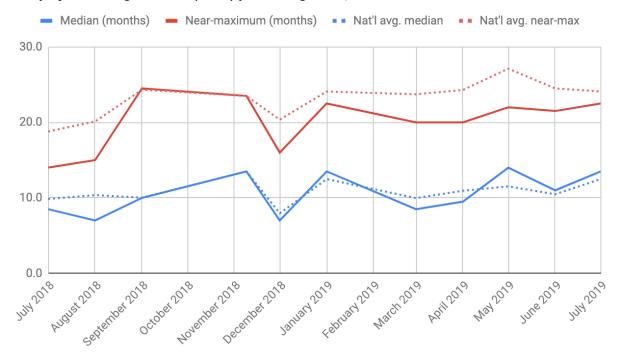
USCIS field office in Houston, TX



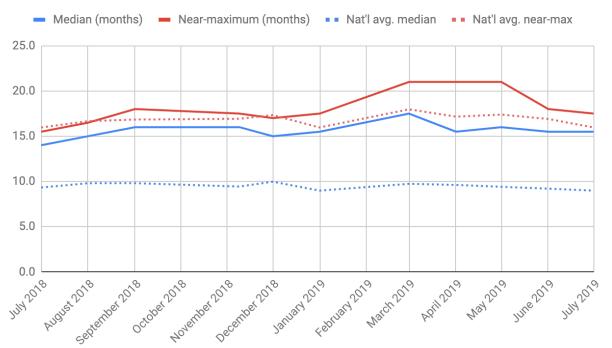
USCIS field office in Houston, TX



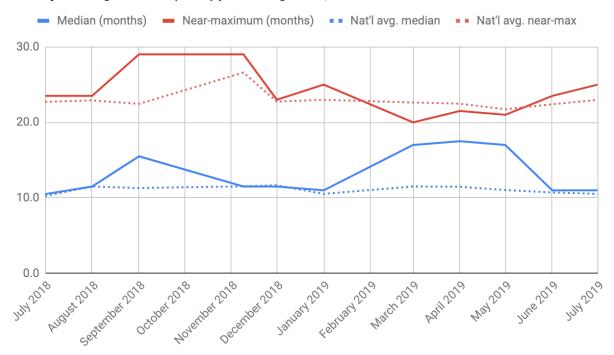
USCIS field office in Houston, TX



USCIS field office in Seattle, WA



USCIS field office in Seattle, WA



USCIS field office in Seattle, WA

