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Testimony of Rosalind Gold

Chief Public Policy Officer

NALEO Educational Fund

to the

Immigration and Citizenship
Subcommittee

of the

House Judiciary Committee

for its hearing entitled

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

July 16, 2019

Chairwoman Lofgren, Ranking Member Buck, and Members of the Subcommittee on Immigration and Citizenship: Thank you for the opportunity to submit the following testimony for entry into the record of the Subcommittee's July 16, 2019 hearing concerning Policy Changes and Processing Delays at U.S. Citizenship and Immigration Services (USCIS), on behalf of the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund. As an organization that assists qualified legal permanent residents (LPRs) to pursue naturalization and that advocates policies that promote U.S. citizenship, we are dismayed that burdensome, unnecessary policy changes have slowed USCIS's processing of applications from FY16 through the present, to the detriment of all Americans. We urge Congress to demand that USCIS focus on its core mission of administering the legal immigration and naturalization system, prioritize efficiency in its regulatory and data collection initiatives, and re-engage with stakeholders whose advice and assistance have long helped the agency improve its service to customers.

NALEO Educational Fund is the nation's leading nonprofit organization that facilitates the full participation of Latinos in the American political process, from citizenship to public service. Our Board members and constituency encompass the nation's more than 6,700 Latino elected and appointed officials, and include Republicans, Democrats and Independents. Recognized nationally as a civic engagement pioneer with more than 30 years of experience, NALEO Educational Fund has guided hundreds of thousands of eligible LPRs through the naturalization process, and translated its expertise into proven capacity-building efforts among local community-based organizations. We have also successfully advocated policies that make naturalization more accessible, such as the stabilization of the naturalization application fee and the creation of a partial fee waiver for qualified LPRs seeking citizenship. In addition, we coordinate the Naturalization Working Group (NWG), a coalition of national and local advocates and service providers that have significant experience in promoting U.S. citizenship and assisting newcomers with the naturalization process, including immigrants serving in the military.

As a leader of local and national efforts to integrate new Americans, we and our constituents see firsthand the ways that communities throughout the nation benefit when immigrants become full participants in America's civic life. Immigrants who learn English to prepare for naturalization earn exponentially more, and generate more public revenue through tax payments and other economic activity, than their counterparts who are not yet fully fluent in English. New Americans are more likely to own homes and to make other investments in the United States than their non-U.S. citizen counterparts. They are also a dynamic group of people who have made critical contributions to our national security and the health of our democracy as elected officials, military servicemembers, and voters. In short, U.S. citizenship is a tide that lifts every boat in the nation, and therefore, as Congress has frequently stated, USCIS policies and management should prioritize swift and efficient approval for the naturalization of qualified applicants. USCIS actions have unfortunately contravened Congress's directive and contributed to excessive delays, so Congress must reassert its authority and ensure that USCIS fulfills its mission.

Application Processing Delays and Backlogs as of July 2019 Are Extraordinary, Irregular, and Harmful

NALEO Educational Fund is extremely alarmed at the negative consequences of lengthening waits for processing of applications for naturalization and other immigration services, which have resulted in growing backlogs of applications. Like our fellow

community stakeholders who have testified before and submitted statements to this Subcommittee, our analysis of USCIS data and our applicants' experiences demonstrate convincingly to us that naturalization applicants must wait far longer for adjudication today than they did three or four years ago or more, and that far more applicants are in limbo awaiting USCIS decisions at present than had pending applications prior to FY16. For example, as of September 30, 2015, USCIS had 367,009 naturalization applications pending decisions; as of September 30, 2018, the agency had 738,148 Form N-400s in its backlog. According to USCIS, its average processing time for naturalization applications was 5.8 months in FY15, and 10.3 months in FY18, even though there was no intervening change to naturalization law or requirements.

Even more troubling than these nationwide trends is the fact that circumstances vary widely between USCIS Field Offices. While applicants in some parts of the country can move through the naturalization process within a matter of months, as has long been USCIS's goal, applicants in other areas today face average waits for an initial review that are as long as 2.75 years. For example, at the agency's Cleveland, OH office, the backlog of pending cases just barely increased between the 4th quarter of FY15 and the 4th quarter of FY18, from 1,523 to 1,762. The office has continued to manage its workload efficiently: its average N-400 case processing time as of July 2019 was between 3.5 and 11 months. By contrast, at the Minneapolis/St. Paul, MN Field Office just three states away, the backlog of pending cases increased by 161 percent between the end of FY15 and FY18, and average case processing times were between 14 and 23.5 months as of July 2019.

There is no evident explanation for such wide disparities between offices administering the same law and procedures – in particular, the pace of new application receipts at various field offices does not correspond with those offices' varying track records at working through pending cases and limiting average wait times. Immigration software firm Boundless Immigration assigned index scores to each USCIS field office in its February 2019 report, "The State of New American Citizenship," taking into account each office's naturalization application volume, processing times, and backlogs over time. The company found that, "the correlation between field office index and application volume is fairly weak," with some high-volume offices ranking among the most effective and efficient, and other low-volume offices falling into the bottom rank. Boundless Immigration also observed that field offices may vary widely on other markers of performance for which variations would not be expected: for example, Fort Myers, FL, Orlando, FL, West Palm Beach, FL, Imperial, CA, and Omaha, NE offices each denied naturalization applications at nearly the twice the average national rate.

Large backlogs of pending applications and long waits for adjudication that can exceed one or two years create significant challenges for the American families, businesses, and other stakeholders who rely upon USCIS's timely efforts, and who are unaccustomed to waiting anywhere near as long for an answer on any other application for government services or benefits. Growing awareness of the agency's failure to keep up with its workload lessens the federal government's trustworthiness, eroding its accountability to the public and its fidelity to Congressional directives to prioritize and accelerate naturalization of qualified immigrants. While qualified applicants languish in line, their communities and the whole nation lose out on the benefits that will stem from citizenship, including increased tax revenues and more robust civic exchange. Moreover, delays beget more delays because LPRs whose naturalization applications are pending for long periods are more likely to be forced to file for additional services, such as green card renewals. In short, backlogs and

delayed processing of naturalization applications are serious problems; Congress should demand that USCIS define their causes and pursue concrete solutions.

USCIS's Policy Proposals Have Exacerbated, and Still Threaten to Worsen, Backlogs and Delays

NALEO Educational Fund supports Members of Congress's request for a Government Accountability Office investigation of application processing delays at USCIS, which was accepted on May 31, 2019, because absent such inquiry and analysis, we do not have access to detailed information that would help Congress and the public fully understand the reasons for the problems that have arisen at USCIS between FY15 and FY19. At the same time, our observations and logic tell us that policy choices at the agency are at least one contributing factor, if not a central reason for, the slowing of USCIS adjudications. USCIS itself concurs, and cites "new programs and policies" and "added security requirements" among the reasons for the extraordinary buildup of pending cases at the agency. The policy proposals at issue generally increase burden without sufficient justification, and their likely negative impact on application backlogs and processing times should further mitigate against their adoption, and against their approval by reviewing entities including the Office of Management and Budget (OMB) and federal courts. In the following sections we describe some, but not all, of the policies that have contributed to USCIS's inability to timely process applications.

Unwarranted and Duplicative Investigations of Applicants

Several formal initiatives and informal trends have resulted in increased scrutiny of many applicants for immigration services, including applicants for U.S. citizenship, even though we know of no objective reason why such additional scrutiny is necessary, nor evidence that it has improved the accuracy of adjudications. Whether or not enhanced investigations target aspiring Americans, they increase burden on USCIS employees and divert time and effort from adjudications, lengthening backlogs and delays.

For example, in 2017 USCIS began requiring officers to conduct in-person interviews with categories of applicants for visas who were previously exempted unless case-specific concerns existed. Withdrawing adjudicators' discretion has significantly increased the time required to process applications for permanent residency based on employment or relationship with a refugee or asylee, and strained limited resources available to complete other tasks. Similarly, in 2017 USCIS rescinded an internal policy of favoring approval of requests to extend previously-granted temporary work permits, absent changed circumstances. Adjudicators must now re-assess each application for extension, regardless of whether any factors justify extraordinary additional scrutiny. Finally, dramatic increases in the rate of issuance of Requests for Evidence (RFEs) in response to particular kinds of filings are additional evidence that adjudicators face internal pressure to investigate applicants unnecessarily and aggressively, although no apparent change in the overall qualifications of applicants would warrant this approach. During the first quarter of FY19, more than half of new applicants for H-1B work visas received RFEs, compared to just 20.8 percent of all applicants in FY16. The additional, unjustified scrutiny USCIS employees are applying to a large number of applicants for services cannot but slow their efforts to keep up with incoming cases while also working through the backlog of pending requests.

USCIS's changed policy around issuance of RFEs and Notices of Intent to Deny (NOID) is another example of a discretionary choice that has increased red tape for both applicants and adjudicators. It has long been the case that when USCIS received an application that seemed to be incomplete or incorrect, its standard practice was to send an RFE or NOID, as appropriate, in response to which petitioners could correct errors and supplement evidence. However, as of September 2018, adjudicators may decline to give applicants a chance to correct or supplement their files before denying an application. As a result, individuals who could previously perfect their applications during adjudication are now summarily denied benefits, and must re-start applications anew, which multiplies USCIS officers' and applicants' time on task, and obligates applicants to pay fees twice.

In addition, the Department of Defense's (DoD) new policy, adopted in 2017, of delaying LPRs' enlistment and certification of honorable service for naturalization purposes was particularly alarming to NALEO Educational Fund. LPRs have long served with distinction in our Armed Forces, and Congress has recognized the value of that service by creating an expedited path to U.S. citizenship for servicemembers, especially those on active duty during periods of declared war. Although LPRs have already undergone at least one, and sometimes several, rounds of federal government-led background and security checks prior to their enlistment, the DoD began differentiating between them and U.S. citizens seeking to enlist, and requiring that its own background checks be completed prior to LPRs entering into active duty; the DoD did not require U.S. citizens to undergo this scrutiny. Moreover, although the law grants wartime servicemembers immediate eligibility to apply for citizenship upon enlistment, the DoD began refusing to issue necessary certifications of satisfactory service until at least six months after servicemembers' enlistment, effectively delaying their submission of applications for citizenship.

In sum, in the name of conducting further investigations of some of the most-scrutinized residents of our country, the DoD virtually brought to a halt the incorporation into the Armed Services of uniquely talented and patriotic LPRs. In late 2018, a federal judge found that the agency could not justify these policy changes, and ordered their reversal; but, in the interim, several thousand aspiring servicemembers languished in limbo, and unsurprisingly, the number of new and approved applications for U.S. citizenship from military servicemembers dropped precipitously. Between July and September of 2017, before these policies' adoption, 3,132 servicemembers applied for naturalization, and 2,123 were approved; by comparison, during the quarter spanning July through September 2018, under the influence of new policies, just 798 servicemembers submitted new applications, and USCIS approved just 1,557 pending applications.

These examples of USCIS's practice of heightened scrutiny of applicants and resulting exacerbation of processing delays are consistent with New Americans Campaign (NAC) members' anecdotal experiences. In response to a 2018-19 survey, significant percentages of practitioners with NAC organizations reported that naturalization interviews frequently lasted longer than they previously had; that officers were asking applicants more searching questions about aspects of their personal histories that were irrelevant to adjudication of naturalization requests; and that officers were less likely than they previously had been to exercise discretion in applicants' favor. For example, one NAC member represented a client who was improperly turned away from her naturalization ceremony when a USCIS employee checking her in questioned whether the client's English speaking ability was sufficient for naturalization, even though the client had already passed an English examination during her naturalization interview. This officer's attempt to apply

extraordinary scrutiny in a way that the law does not allow only failed because the client had able, affordable legal representatives who successfully appealed the move on her behalf.

Addition of Bureaucratic Burden to Application Procedures

While explicitly mandating heightened scrutiny of several categories of applicants, USCIS has also implicitly moved toward conducting more searching reviews of petitioners by proposing to lengthen and complicate application components and add administrative red tape to legal immigration processes. Whether or not internal instructions to adjudicators evolve to specifically require new tests or investigations based on additional information the agency requires applicants to submit, these increasingly burdensome requests for information would have the natural and unavoidable effect of slowing intending applicants and lengthening the petition review process. This effect would be unconscionable where, as here, proposed changes are not justified by any recent change in the law, nor by any problem with adjudications using previous policies and practices.

In the space of just one year – from July 2018 through July 2019 – USCIS proposed to lengthen forms and complicate instructions associated with numerous aspects of the naturalization process. In late 2018, USCIS proposed several burdensome additions to the N-400 application for naturalization, including overbroad requests for up to ten years of travel history (though no more than the most recent five years will be relevant to any adjudication) and for information about all of the activities of any groups with which an applicant has ever associated in his or her life. This form is already 20 pages long and contains 50 questions about the applicant's background and conduct, in addition to sections requesting immigration, employment, and educational history, residences, and family information. However, USCIS would have sought even more information about topics with no conceivable relevance to naturalization adjudication, such as history of having one's fingerprints taken. USCIS has since put these proposed changes in suspense and secured OMB authorization to continue using the present, unchanged N-400, but its actions with respect to other data collections it conducts belie a troubling agency-wide intent to make applications more burdensome without any predicate.

We are particularly concerned by changes to the fee waiver application process that USCIS proposed in 2018 and continues to move toward approval and adoption. Majorities of the fee-waiver-eligible naturalization applicants with whom we work have for many years submitted proof of their receipt of means-tested benefits to show that they qualify for waivers. Whereas other accepted forms of proof require often-voluminous documentation of financial circumstances, and adjudicators' intensive analysis of that documentation, receipt of means-tested benefits takes advantage of another government agency's prior evaluation of an applicant's financial situation, and can be proven with a single page. In spite of its obvious efficiency advantages, USCIS wants to eliminate this method of application for a fee waiver. Its proposal would impose a new requirement that family members applying simultaneously for waivers on the basis of identical documentation submit a separate application and copy of supporting material for each individual applicant. Worse yet, the agency's stated justification for advancing these burdensome changes has shifted over time. Most recently, USCIS connected its proposed revisions to a purported desire to reduce the number of fee waivers approved, but controlling regulations prohibit it from arbitrarily denying requests from qualified people, and render this justification impermissible.

In addition to asking fee waiver applicants and adjudicators to produce and review more unnecessary paper, USCIS has also begun the process of attempting to add questions and other bureaucratic requirements to such forms as the N-445 Notice of Oath Ceremony, the N-648 Medical Certification for Disability Exceptions, and I-90 Application to Replace a Permanent Resident Card.

For example, USCIS has adopted a rule that generally requires an N-648 to be filed at the same time as the N-400, notwithstanding the fact that because of the extreme backlog of pending applications, many LPRs now wait two years or more from submission of an N-400 to be called for a naturalization interview. During such lengthy delays, it is at least possible, if not likely, that detailed analysis of the effects of an applicant's impairments may change. Where that happens, applicants will be forced to re-do examinations and re-submit information about issues they have already addressed. The new rule will also force applicants who develop a disability during the pendency of their applications to expend extra time, energy, and expense defending the timing of their requests for accommodations.

In addition, proposed revisions to the N-648 would add patently superfluous busy work for physicians who complete them. Although the form already includes extensive questions about the nature and consequences of an applicant's disabilities, including, "Clearly describe how each of the applicant's disabilities and/or impairments affects his or her ability to demonstrate knowledge and understanding of English and/or civics," a proposed revised N-648 would also separately include virtually identical, duplicative instructions to, "Describe the severity of effects of each disability/impairment" and "Describe how each relevant disability/impairment affects specific functions of the applicant's daily life, including the ability to work or go to school, ability to learn civics and/or English, etc." This is bureaucratic overreach at its worst, and it is egregiously unconscionable that USCIS would push more burden on the public and its own workforce while the agency is already falling short in its effort to timely manage its existing caseload.

Diversion of USCIS Funding and Human Resources to Enforcement Functions

Under the Homeland Security Act of 2002, which created the DHS, Congress deliberately separated most of the immigration services and adjudication functions of the legacy Immigration and Naturalization Services into separate agencies, with two focusing on enforcement (Interior and Customs Enforcement (ICE) and Customs and Border Protection) and the USCIS focusing on adjudications and services. One goal of the reorganization was to enable the USCIS to concentrate its resources and attention on fair and efficient adjudications. However, USCIS's efficient management of its workload also has likely declined because the present Administration has blurred the lines dividing the missions of various components of DHS, and has overloaded USCIS by assigning its employees enforcement functions on top of their core work of adjudicating affirmative applications for status. Its entanglement in enforcement activities is not an appropriate or efficient use of USCIS's human and other resources, particularly at this moment in time.

The enforcement functions that administrators have added to USCIS officers' workload include issuance of Notices to Appear (NTAs) to benefits applicants who may be removable. As of late 2018, adjudicators not only issue decisions on visa and citizenship requests, but must also evaluate whether applicants whose petitions they deny thereby

become removable. Whereas officers previously referred any concerning cases to experts at ICE for initiation of removal charges, USCIS now expects its employees to make enforcement decisions and to issue NTAs for immigration court. This adds analytical and administrative work for already-overburdened officers who are not equipped like ICE employees are to make accurate and appropriate decisions about immigration enforcement.

In addition, the present Administration has expanded the scope of Operation Janus and other efforts to re-investigate naturalized Americans, and to pursue the denaturalization of some. Historically, immigration authorities and the Department of Justice only sparingly initiated denaturalization proceedings, mostly in rare cases in which Nazi officers or others guilty of serious international offenses obtained U.S. citizenship by hiding their true identity. But during 2017 and 2018, the government has accelerated this work, and sought to revoke the citizenship of even longtime naturalized Americans and their dependent family members on the basis of much less serious matters. This effort rests on a significant attempted redirection of USCIS personnel and resources from benefits adjudication to overbroad, unwarranted vetting of Americans. In an FY19 budget request, for example, the Administration asked that more than \$200 million be set aside to inquire further into the histories of as many as 700,000 naturalized citizens.

A sample of the kind of denaturalization case that has resulted from this diversion of resources illustrates just how unjustified USCIS would be in further expanding investigations to the detriment of its adjudicatory work. Earlier this year, the government took its charges against Parvez Manzoor Khan to trial in Florida. Mr. Khan is a grandfather who has lived and worked in the United States without incident since becoming a citizen in 2006. He came to the attention of authorities who discovered that he had failed to disclose a prior deportation order during his naturalization proceedings. But Mr. Khan could not have done otherwise, because – due in part to linguistic barriers that impaired his communication with his first attorney, who was himself eventually suspended by the California Bar Association – he never received notice of a 1992 hearing and never knew that an immigration court had ordered that he be removed at that time. Mr. Khan has demonstrated exemplary conduct as a citizen, and is the sole source of support for his American wife of more than twenty years, who in turn is the primary caregiver for their three young grandchildren. Under these circumstances, it would not seem to most objective observers to be worth any of the government's time and money to try to revoke his citizenship, especially where that expenditure directly detracts from USCIS's ability to work through its backlog and provide competent service.

Finally, USCIS and the present Administration continue to seek to diminish the funding available for adjudication, and to reassign the agency's resources to immigration enforcement. Most recently, as this Subcommittee was receiving testimony from USCIS employees who acknowledged the problematic nature of the backlog and pledged to pursue remedial actions, news emerged that USCIS Deputy Director Mark Koumans had asked USCIS employees to volunteer to be detailed to provide administrative support to ICE. This contradictory conduct raises unfortunate doubts about the trustworthiness of career employees' assertions to this Subcommittee that USCIS takes processing delays seriously, and is committed to working through application backlogs expeditiously.

USCIS Must Reprioritize Application Adjudication and Achieving Efficiencies to Conquer Its Backlog

NALEO Educational Fund is pleased that USCIS has begun, through the present hearing, to describe to Congress in concrete terms the steps it will take to eliminate its application backlog and return case processing times to reasonable levels. However, we remain concerned that the agency has not fully acknowledged the reasons for the backlog, nor given adequate consideration to remedial steps that would most effectively solve present problems. In particular, we urge USCIS to halt its work on anything other than its proper functions: application services adjudication, provision of confirmation of status to public assistance agencies and employers, and promotion of U.S. citizenship. Moreover, as it manages data collection to carry out these functions, USCIS must prioritize efficiency over secondary considerations.

To make substantial progress in reducing application backlogs and waiting times for processing, USCIS should pause or reverse policy changes that have increased, or would increase, adjudicators' workloads. It is particularly important that the agency end its entanglement with enforcement efforts and return NTA issuance, denaturalization investigations, and other similar work to the hands of DHS personnel in other agencies like ICE whose mission is enforcement, and whose training and experience best equip them to handle these functions.

USCIS should also redirect funding and personnel to initiatives that hold promise of improving internal efficiency. For example, problems with the functioning of USCIS's electronic filing system ELIS have severely limited its usefulness, especially for applicants for naturalization who need to file supplemental forms not yet available on ELIS. USCIS should make tasks like expanding ELIS functionality and reliability its first priority. Both applicants and adjudicators could move through the naturalization process more quickly if, for example, applicants could file I-912s and N-648s electronically, simultaneously with their N-400s.

In addition, we strongly urge USCIS to resume substantive public engagement with its stakeholders. Organizations like ours, that possess a wealth of policy expertise as well as practical experience assisting aspiring new Americans, have long been an irreplaceable source for USCIS of knowledge, creative thinking, and feedback. Through regular, open engagement, advocates worked with USCIS staff to develop concrete solutions to adjudication challenges. In some cases, this has resulted in changes in practices by our organizations which have improved the completeness and quality of information on the forms our applicants submit. This engagement has helped shape USCIS into a more effective and efficient agency.

However, our access to USCIS personnel, and the quality of their engagement with us, have declined as backlogs have increased. For example, USCIS representatives previously attended NWG meetings at our invitation – there, they answered practitioners' policy questions and could participate in discussions of trends and concerns. At present, USCIS personnel tell us they cannot attend our meetings, and also that they cannot answer any questions or provide any information unless communications are in written form and are posted in a public reading room. Although we have submitted written questions, we have yet to receive responsive answers, in written form or otherwise. By severing its connections

and regular communications with knowledgeable stakeholders, USCIS is missing out on a critical source of information and suggestions that would help it achieve greater efficiency.

Many of the specific solutions to the backlog that USCIS has advanced raise concerns for us, and in the absence of effective public engagement by the agency, we call on Congress to help communicate these critiques to the appropriate officials. While we support accelerated hiring by USCIS, and believe that the proposed transfer of non-adjudicative work to non-adjudicators is a promising idea, we are apprehensive that other proposals could further restrict access to citizenship.

USCIS believes that reforms of its InfoPass system for requesting in-person audiences with personnel will improve its ability to timely process applications. While our staff and clients have struggled to secure appointments through InfoPass and invite reform of this system, we have also experienced widespread anecdotal problems with the new alternative to the InfoPass system, the USCIS Contact Center. For example, practitioners have been refused phone transfers to a supervising officer, though USCIS has said that its policy is to grant all such requests. In some instances, applicants who needed in-person appointments to obtain documentation necessitated by processing delays have failed to secure them. In our experience to date, the Contact Center has not met all stakeholders' needs. USCIS should engage in further dialogue and make internal adjustments to improve this system; otherwise, it will hinder rather than speed elimination of backlogs.

USCIS proposes encourage its officers to work more quickly by reintroducing performance metrics, and to facilitate their efforts by increasing automation and applicants' use of tools like ELIS. We agree that USCIS should develop a more user-friendly, reliable electronic filing system and dedicate attention to adjudicators' performance. However, such initiatives could just as easily raise barriers to naturalization as lower them, and therefore we urge caution. It would help USCIS to have a realistic understanding of the length of time adjudicators spend on various tasks and cases, and to identify and consider reforms to any particularly time-consuming procedures. But if, for example, the agency were to impose hard case completion requirements upon adjudicators without care or nuance, it would likely push them into sloppier decision-making, and that, in turn, could make more work for the Administrative Appeals Office and other components of the agency, and more suffering for qualified applicants and their families. Similarly, it would not be constructive or efficient for USCIS to push or force more applicants to use ELIS before bugs were eliminated, or before the system can support all of USCIS's forms, or before the agency planned adaptations and accommodations for people who could not easily access ELIS.

Finally, we strongly oppose USCIS's proposal to reset its processing time goals. An attempt to reorient the public's expectations does nothing to alleviate the hardships that stem from excessively long waits for adjudication, and strikes us as a dishonest effort to posit that the agency cannot do more than it has already done. In fact, USCIS and the Immigration and Naturalization Service before it have faced larger backlogs than the present one, and have dealt with them more effectively in less time than today's USCIS has. We have confidence that by revisiting its priorities and refocusing on its core mission, USCIS can once again deliver on its promises to produce timely and well-considered decisions. By achieving this goal, USCIS will fulfill one of the important components of its mission – honoring our nation's value of providing fair and efficient services to applicants that seek to become full Americans. This will serve our country's interests by strengthening our economy, national security and democracy.

Thank you for your consideration of our views, and for your attention to the important topics of this hearing.

