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Comment Submitted by KINZA SCHUYLER

Posted by the **U.S. Citizenship and Immigration Services** on Jul 15, 2022

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Comment

July 15, 2022

Submitted via Federal eRulemaking Portal

Samantha L. Deshommes

Chief, Regulatory Coordination Division

Office of Policy and Strategy

U.S. Citizenship and Immigration Services

Department of Homeland Security

20 Massachusetts Avenue, NW

Washington, DC 20529–2140

Dear Chief Deshommes:

I write on behalf of Lutheran Community Services NW, in the Seatac Washington office, in response to a U.S. Citizenship and Immigration Services' (USCIS) notice of a proposed extension of a currently approved collection of information, Form N-400, Application for Naturalization ("N-400", "Form", or "Application").

Our agency provides multiple services to immigrants, refugees and asylees, ranging from immigration assistance to mental health counseling in many languages, and a multitude of social services in between.

Rarely are our clients native English speakers, many of them have no English at all and they are predominantly low income. Our immigration work includes numerous applications for citizenship, which often include N-648 waivers. DOJ accredited representatives provide all our immigration assistance. I have been providing immigration representation since 1995.

In the ensuing years since 1995, more and more barriers have been placed on applying for citizenship, as the form N-400 becomes longer, more complicated, and uses more complex language.

One problem assisting clients to complete the N-400 is that the level of English used in the questions is far beyond 4th grade level. So even with people who speak English fairly well, it necessitates much additional time to explain what the questions mean. Even interpreters often require explanation, before they can begin to interpret for the client. This problem extends not only to the preparation of the form, but confronts the clients in their citizenship interview when the officer goes through all the questions.

Several concepts are also difficult to explain and to expect clients to remember them a year or two later when they go to the interview is asking more than an ability to communicate at 4th grade level. "Do you owe any overdue taxes" troubles many clients. Language further exacerbates the problem. For example, a double negative like "have you ever not filed a tax return" is far more problematic than "do you file a tax return every year (or every year that you work).

The N-400 uses many slightly nuanced questions to ask about basically the same outcome. For example, Part 12, Question 15 you could ask if someone was involved with any organization that fought or used weapons, without delineating 9 different types of organizations. Often they don't make a distinction between "vigilante" "rebel" "militia" and "insurgent".

Some of the wording is vague. What does it mean to "support" the Constitution and form of government of the United States? Do you want to make sure they "obey the laws of the USA"? When evaluating the N-400, I think it is important to decide the crucial issues you want someone to address in becoming a citizen, rather than writing obliquely to explore every little detail.

The application feels very adversarial, rather than welcoming. It is daunting and discouraging. It makes you feel like the government is trying to find every little way to trap you. And it is so long it causes a significant burden on agencies trying to help people understand and complete the application.

If you require further information, please do not hesitate to contact me at kschuyler@refugeesnw.org.

Thank you for the opportunity to submit comments on the proposed extension.

Sincerely,
Kinza Schuyler, DOJ Accredited Representative

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