

October 10, 2025

The Honorable Joseph Edlow
Director, US Citizenship and Immigration Services
USCIS Headquarters, 5900 Capitol Gateway Dr.
Camp Springs, MD 20746

**RE: ONGOING CONCERNS REGARDING THE IMPLEMENTATION OF THE 2025
NATURALIZATION CIVICS TEST**

Dear Director Edlow,

The undersigned members of the Citizenship Test Working Group, the Naturalization Working Group, and national, state, and local partner organizations dedicated to promoting access to naturalization for eligible individuals across the nation respectfully request that the United States Citizenship and Immigration Service's (USCIS) Office of Citizenship halt the implementation of the 2025 Naturalization Civics Test in order for USCIS to have a proper notice and comment period as established under the Administrative Procedures Act (APA) for stakeholder input and to adequately prepare impacted communities for any test changes.

Many of the below-signed individuals and organizations have decades of experience with the test and were part of earlier revision processes. Our groups have appreciated the opportunity to engage with the Office of Citizenship, Office of the Citizenship and Immigration Services (CIS) Ombudsman, and the Department of Homeland Security (DHS) Office of Civil Rights and Civil Liberties during the Test Redesign Initiative, as well as engaging with the Office of Management and Budget on budgetary and logistical impacts of the test redesign.

Concerns Over USCIS Proposed Changes to Naturalization Test Set to Take Effect

On September 17, 2025, USCIS announced the implementation of the revised 2025 naturalization civics test.¹ Initially proposed in November 2020 to increase the difficulty of the test for citizenship applicants, the effort was subsequently rescinded by the previous administration in early 2021. At the time, USCIS determined the 2020 civics test development process, content, testing procedures, and implementation schedule could **"inadvertently create potential barriers to the naturalization process."**²

¹ USCIS, News Release, USCIS Unveils First Changes to Naturalization test in Multi-Step Overhaul of American Citizenship Standards, Sep. 17, 2025
<https://www.uscis.gov/newsroom/news-releases/uscis-unveils-first-changes-to-naturalization-test-in-multi-step-overhaul-of-american-citizenship>

² USCIS, Archive Content, USCIS Reverts to the 2008 Version of the Naturalization Civics Test, Feb. 22, 2021,
<https://www.uscis.gov/archive/uscis-reverts-to-the-2008-version-of-the-naturalization-civics-test#:~:text=Archive-.Archive.accessible%20to%20all%20eligible%20individuals>.

The Federal Register Notice (FRN) published on September 18, 2025,³ announcing the implementation of the 2025 Naturalization Civics Test, will subject individuals who file their naturalization applications on or after October 20, 2025, to the new test requirements. We write today with serious concern regarding the sudden overhaul of the citizenship test, especially in the context of broader policy changes that **will make it harder for eligible communities to access naturalization**. The administration has not **presented substantial evidence** that the changes are necessary to protect the integrity of the naturalization process, which it cites as a basis for justifying this shift.

The revised naturalization test raises the total number of questions from 100 to 128. Applicants will now need to correctly answer 12 out of 20 questions (increased from 6 out of 10). The 65/20 rule remains in effect, meaning applicants aged 65 or older with 20 or more years as a permanent resident need to study from a specially selected set of 20 questions. However, they will be asked up to 10 questions and must answer at least six correctly, which will be drawn from either the 2008 or 2025 Naturalization Civics Test. These changes carry a disproportionate impact that will undercut equal access to a pathway to citizenship that individuals have already demonstrated eligibility for through a series of reviews and years contributing to this country. The new test poses significant challenges, particularly for individuals with low literacy, limited financial resources, lack of access to preparation materials, and older applicants who may find the increased complexity difficult to navigate.

We strongly oppose the proposed changes to the naturalization test, as the agency has provided no substantiated justification for the need for such changes, and we raise serious concerns about the 2020 development process and the pilot test USCIS is using as a basis for the 2025 version. The **absence of a clear rationale for changing the test**, flaws in the statistical data from the 2020 pilot test, and significant changes to the content of the revised test are the underlying issues behind our objection. Our concerns are compounded by the lack of public input prior to adopting the new policy and the extremely limited time for adaptation, as the test is set to be implemented in less than 30 days. These factors, taken together, raise **serious questions about the necessity of such changes, the fairness of the naturalization process for eligible applicants, and the lack of due consideration in agency determination**.

I. Lack of sound rationale on the need for changing the Test

In 2020, USCIS made unfounded statements about the rationale for the changes, claiming that the revision is required to ensure the test "remains an instrument that comprehensively assesses applicants' knowledge of American history, government, and civic values", and to ensure the test content "remains relevant." However, USCIS did not provide—then or now—any data-supported or scientific analysis to demonstrate that the 2008 test was inadequate or failed to measure applicants' civic knowledge accurately.

The agency's justification in the FRN for the 2025 modifications—that they are intended to promote a "unified American identity and attachment to the Constitution, laws, and

³ 90 FR 45047

founding principles of the United States"—is **arbitrary and capricious**, and lacks a reasonable basis in law or fact, failing to acknowledge how the 2008 test does not fulfill the statutory requirement under Section 312 of the INA, which mandates applicants demonstrate "knowledge and understanding of the fundamentals of U.S. history, principles, and government." In the absence of a satisfactory explanation grounded in sound rationale and consideration of all relevant factors, including how the new test **disproportionately burdens certain populations without a compelling justification**, the proposed changes by the agency are not warranted.

II. Lack of Proper Notice and Comment Period Under the APA and Adequate Stakeholder Notice and Public Engagement

USCIS has previously sought public input on changes to the citizenship test, however, the agency bypassed this process in 2020 and appears poised to do so again with its latest announcement. This raises serious legal concerns as it deprives the public – and particularly subject matter experts in immigration law and civic education – a meaningful opportunity to participate in the process and to assess whether the proposed changes are necessary, legally reasoned, or valid. By administering the 2025 civics test, USCIS intends to make **substantive changes to content that will have the force and effect of law, which will have a significant impact on LPRs eligible to naturalize, practitioners, and legal service providers.**

In 2020, organizations recommended USCIS publish a proper notice and comment period to address the effects of the increased questions to the new civics test, and how the agency's actions are bound to notice-and-comment rulemaking under the Administrative Procedures Act (APA) as it would affect a significant population applying for citizenship.⁴ The lack of notice and comment period and public engagement **undermines the legitimacy of the agency's actions and the evidentiary basis needed to support changes to a process as consequential as naturalization.** Given the significant impact the new changes will have on the citizenship process, the public should be given a meaningful opportunity to comment on the notice. The APA) exempts notice and comment rulemaking requirements where they concern "matter(s) relating to agency management or personnel or to public property, loans, grants, benefits, or contracts." 5 U.S.C. 553(a)(2). The APA also permits an agency to forgo these requirements for "good cause" when the agency finds that the procedures are "impracticable, unnecessary, or contrary to the public interest." 5 U.S.C. 553(b)(B). We argue the changes to the test do not fall within these categories and therefore require a notice and comment period. We request that the agency offer stakeholders a fair chance to provide feedback on the new test process through a comment period, public engagement, and a delayed implementation, allowing service providers time to assess how the community receives the changes. As it stands, the new test is set to be

⁴ Catholic Legal Immigration Network, Inc. (CLINIC), *RE: Policy Guidance Revisions: Civics Educational Requirement for Purposes of Naturalization*, Dec. 1 2020. Additional organizations and individuals submitted comments to USCIS concerning the announcement and implementation of the 2020 Naturalization Civics Test

implemented in less than a month, leaving those impacted – lawful permanent residents, legal practitioners, educators, and community organizations – **unprepared to navigate the changes effectively**. Therefore, we request that the agency extend the effective date of the new test from 30 days from the publication of the notice to at least 90 days to ensure adequate preparation.

III. Concerns Regarding the 2020 Pilot Test

In an email to stakeholders on November 13, 2020, USCIS stated: "USCIS piloted the test with community-based organizations and volunteers across the country in summer 2020. The data collected from this pilot was used to help USCIS make determinations about the language and grammatical structure of individual test items, linguistic and cognitive weights assigned to each test item, and to identify those items appropriate for applicants who are 65 years or older, have held lawful permanent status for at least 20 years, and are granted special consideration by statute."

The disclosure regarding the pilot test lacked transparency and failed to provide a meaningful opportunity for public engagement and stakeholder input. The few organizations invited to participate in the pilot were hand-selected by USCIS without any transparent rationale regarding the segments of the lawful permanent resident (LPR) population they represent or serve.

Statistical Flaws during the summer 2020 pilot test

Our review identified several major flaws in the 2020 pilot test:

- **Insufficient Sample Size:** Informal reports indicated that only 250 applicants were tested, despite the fact that over 700,000 LPRs apply for naturalization annually. Such a small sample is inadequate for drawing meaningful and statistically significant conclusions.
- **No Control group:** Without a control group, it was impossible to measure whether new test items had the intended effect compared to the existing test.
- **Unrepresentative sample:** The pilot sample was not designed to, and did not reflect the diversity of the LPR population in terms of age, country of origin, language, gender, education, and other key demographics necessary to assess fairness and accuracy
- **No testing of language-accommodation provisions:** The pilot failed to evaluate how changes would affect applicants eligible to take the civics test in their native language.
- **Lack of transparency on passing rates:** USCIS did not release data on the passing rates of participants. It remains unclear what threshold USCIS considered acceptable for validation.

IV. Concerns regarding the 2025 revised test

The 2025 revision compounds the concerns identified in 2020. USCIS introduced new questions and altered the wording of others without retesting these items before finalizing them. Including untested questions risks unfair and inaccurate assessment, particularly for applicants randomly assigned such items.

We believe the 2020 and 2025 citizenship tests are neither uniform nor fair for all individuals applying for naturalization. While the agency claims that the 2020 test pilot helped USCIS refine the language, grammatical structure, and cognitive weighting of individual test items, the reality is that the new test disproportionately burdens a significant portion of the LPR population.. The adjustments made in the revised test seem to overlook the unique challenges faced by applicants with lower literacy levels, limited access to educational resources, and those from non-English-speaking backgrounds. As a result, these changes create inequities in the testing process, making it harder for certain populations to succeed, which undermines the principle of fairness in the naturalization process.

Test Content Concerns

The 2025 test is substantially more difficult than the 2008 version. This creates unnecessary and inequitable barriers for LPRs pursuing citizenship. Adding 28 new questions and modifying existing content does not, in itself, provide evidence that applicants will demonstrate a higher level of civic knowledge or integration into U.S. society.

Some questions, according to Adult Education experts,⁵ reflect a level of difficulty comparable to “college-level” coursework—far more advanced than the 2008 questionnaire and even beyond the general level of the 2025 questionnaire. These include:

Question 60. What is the purpose of the 10th Amendment?

- (It states that the) powers not given to the federal government belong to the states or to the people.

Question 97. What amendment says all persons born or naturalized in the United States, and subject to the jurisdiction thereof, are U.S. citizens?

- 14th Amendment

Question 103. What was the Great Depression?

⁵ Bill Bliss, *Considering the New Citizenship Exam*, Medium (Nov. 19, 2020), <https://bill-bliss.medium.com/considering-the-new-citizenship-exam-858c31f07fab>

- Longest economic recession in modern history

V. Increased Burden on Service Providers

The 2025 test will also impose significant burdens on naturalization service providers, educators, and USCIS itself, ultimately delaying applications and reducing access to citizenship—especially for vulnerable LPRs who rely on nonprofit and faith-based organizations for assistance.

For example, many citizenship preparation classes—mainly in rural and desert communities—have been historically funded through USCIS grants. Now, with the termination of the Citizenship & Assimilation (C&A) grants,⁶ thousands of individuals will be subjected to a harsher test with less resources available for preparation and must now cover 128 questions instead of 100. This requires longer courses, greater staffing and facility costs, and fewer training cohorts per year. These changes will reduce the capacity of community-based organizations to deliver naturalization services effectively.

To date, USCIS has not conducted any field-impact assessments of these burdens. This lack of analysis is exacerbated by the agency's ongoing reluctance to engage stakeholders meaningfully in both the 2020 and 2025 processes.

IV. Conclusion

Five years ago, organizations opposed the implementation of the 2020 Naturalization Civics because USCIS failed to demonstrate why such changes were necessary and because the procedures through which the test was developed and piloted contained multiple technical flaws. We oppose the implementation of the newly revised 2025 Naturalization Civic Test based on the aforementioned concerns described above. USCIS should consider postponing the implementation of the test until a pilot-test following best practices on test design—including a larger sample—would rule-out any negative consequences in the broader LPR population able to naturalize.

We oppose the implementation of the revised Naturalization Civics Test because USCIS has failed to provide a clear or data-supported justification for replacing the 2008 test and has relied instead on flawed and non-transparent processes in both 2020 and 2025. The agency piloted the test with an inadequate and unrepresentative sample, excluded meaningful stakeholder engagement, and introduced new and modified questions in 2025 without retesting their validity. These actions undermine the fairness and reliability of the test while creating unnecessary barriers for lawful permanent residents seeking citizenship. Moreover, the expanded test imposes costly and unstudied burdens on community-based service providers, which will reduce access to naturalization for the most vulnerable applicants and reduce efficiency in the immigration system. Thank you for your time and consideration. We look forward to your

⁶ Formerly the Citizenship and Integration (C&I) Grant Program, a name change that has shifted with administrations. The CTWG addresses the grants as C&A solely to reflect the current name of the Federal program as of the date of this letter.

response to this letter as well as any opportunity to work with USCIS to improve the naturalization process. If you have any questions, please contact Pedro Alemán-Perfecto, Policy Advocate, at Catholic Legal Immigration Network, Inc. at paleman@cliniclegal.org with any questions or to schedule an engagement.

Sincerely,

Citizenship Test Working Group Organizations:

Asian Counseling and Referral Service
Bonding Against Adversity, Inc.
CASA Inc.
Catholic Legal Immigration Network, Inc. (CLINIC)
Citizenship News
Illinois Coalition for Immigrant and Refugee Rights
Immigration Institute of the Bay Area
Immigrant Legal Resource Center
Language & Communication Workshop
Massachusetts Immigrant and Refugee Advocacy Coalition
NALEO Educational Fund
National Partnership for New Americans
Naturalization Network
Seattle Office of Immigrant & Refugee Affairs
Self-Help for the Elderly
UnidosUS

National Organizations:

abc English, L3C
American Federation of Teachers
Asian Americans Advancing Justice- AAJC
Families For Freedom
Friends Committee on National Legislation
IDARE LLC
Immigrant Dignity Coalition
International Refugee Assistance Project (IRAP)

League of Women Voters of the United States
Mi Familia en Accion
National Asian Pacific American Women's Forum
National Education Association
National Haitian American Elected Officials Network
Refugee Advocacy Lab
Refugee Congress
Stop AAPI Hate
Unitarian Universalist Association
USAHello
Welcoming America
World Relief

State Organizations:

Arkansas United
Asian Americans Advancing Justice- Atlanta
Building Skills Partnership (BSP)
Chinese for Affirmative Action
Colorado Immigrant Rights Coalition
East Bay Sanctuary Covenant
Hamkae Center
Hispanic and Immigrant Center of Alabama (¡HICA!)
Immigrant Defenders Law Center (ImmDef)
Immigrant Law Center of Minnesota
Inspiritus, Inc.
Literacy Coalition of Colorado
Louisiana Organization for Refugees and Immigrants
Maine Immigrants' Rights Coalition
New York Immigration Coalition
North Carolina Asian Americans Together (NCAAT)
Oasis Legal Services
Oklahoma City Community College Adult Learning Center
Pennsylvania Immigration Coalition (PIC)
Progreso Latino Inc.

Project Citizenship
Somos Un Pueblo Unido
The Coalition of Refugee Service Agencies (CRSA)
The Future Beyond Charity
The International Institute of Metropolitan Detroit

Local Organizations:

Amigos En Cristo, Inc.
Asian Americans Advancing Justice-Southern California
Asian Pacific Islander Legal Outreach
Bhutanese Community Association of Pittsburgh
Burmese Community
BVUUF Social Justice Council
Caribbean Equality Project (CEP)
Catholic Legal Services
Centro CHA Inc.
Centro Latino de San Francisco
Community Center for Immigrants
Community Legal Services in East Palo Alto
Community Literacy Council
Connected Wisdom
Counsel for Justice
DTC Family First
Emerald Isle Immigration Center
Encuentro
English Skills Learning Center
First Unitarian Universalist Church San Antonio
Fox Valley Literacy
Global Growers Network
HACES
HANA Center
Heartfelt Tidbits
Jewish Vocational Service of Kansas City
JVS Boston

KIWA
La Raza Community Resource Center
Latin American Coalition
Latino Health Collaborative Cincinnati
Literacy Network
Literacy Pittsburgh
Literacy Services of Indian River County
Literacy Volunteers of Central CT
Literacy Volunteers of Charlottesville/Albemarle
Literacy Volunteers of the Eastern Panhandle
Long Island Immigration Clinic, The Sisters of St. Joseph
Los Angeles Unified School District Division of Adult and Career Education
Merrimack Valley Immigrant & Education Center
Mother Veronica Resource Center
Neighborhood House
Neighborhood of Milwaukee- International Learning Program
Nevada Visionaries
Oasis- A Haven for Women and Children
Peace Action of Staten Island
Pedro Arrupe Jesuit Institute
Plaza Comunitaria Sinaloa
Pomona Economic Opportunity Center
SEDES
Services, Immigrant Rights & Education Network (SIREN)
SOMOSgi
St. Mark Community Education Program
St. James Immigrant Assistance
United Community
VPC Citizenship
Water for Ishmael
We Rise SF

Individual education-based signatories:

Cheryl Brierton

Parshu Chamalga

Maria Fernandez

Bob Norris

Ana Maria Paredes