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**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515**

**COMMITTEE ON THE JUDICIARY**  
**(VICE RANKING MEMBER)**

SUBCOMMITTEE ON THE CONSTITUTION  
AND CIVIL JUSTICE

SUBCOMMITTEE ON CRIME, TERRORISM,  
HOMELAND SECURITY, AND INVESTIGATIONS

**COMMITTEE ON OVERSIGHT**  
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SUBCOMMITTEE ON INFORMATION TECHNOLOGY

SUBCOMMITTEE ON THE INTERIOR,  
ENERGY AND ENVIRONMENT

**COMMITTEE ON HOUSE ADMINISTRATION**

November 13, 2017

The Honorable L. Francis Cissna  
Director  
U.S. Citizenship and Immigration Services  
20 Massachusetts Ave NW  
Washington, DC 20008

Dear Director Cissna:

I write to you today after hearing from my constituents about their tedious and exhausting experience with the U.S. Citizenship and Immigration Services (USCIS), particularly at the Vermont Service Center. I understand that the application process for individuals working towards U.S. citizenship is complex and that USCIS has many such applications to manage, but the current process, as it has been described to me, appears to be extremely onerous, opaque, and lengthy.

In order to better serve my constituents, and to ensure that my constituents have a satisfactory experience with USCIS, I respectfully request your written response to the following questions:

- 1) What is the length of the average application process? If the process varies by any factor (country of origin, age, etc.), please provide the average application processing times for each of these factors.
- 2) Has USCIS reviewed the U.S. citizenship application and naturalization process and identified what is causing the delays experienced by my constituents?
- 3) Have any recommendations to speed up application processing times or improve efficiency in the system been identified by USCIS? If so, please provide a copy of these recommendations. Additionally, please identify which recommendations have been implemented, which ones you cannot implement, and which recommendations you plan to implement (including a timeline for the completion).
- 4) If no recommendations have been made to improve the efficiency or speed of the application process, are there any thoughts or ideas you have that could allow USCIS to enable a speedier and more satisfactory application process?

- 5) Are there any legislative measures that you could suggest to Congress to help improve processing times for my constituents and others who are working to become U.S. citizens?

If you need more information, please contact me or my aide, Bailey Dowling at [bailey.dowling@mail.house.gov](mailto:bailey.dowling@mail.house.gov) or 202-225-5341. Thank you in advance for your time and attention to this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Jamie Raskin". The signature is written in a cursive, flowing style.

Jamie Raskin  
Member of Congress



**U.S. Citizenship  
and Immigration  
Services**

July 2, 2018

The Honorable Jamie Raskin  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Raskin:

Thank you for your November 13, 2017 letter regarding U.S. Citizenship and Immigration Services (USCIS) application processing, particularly at the Vermont Service Center. I regret the delay in this response to your letter, which we did not actually receive until after your staff followed up on February 16, 2018 and we determined we had never received it.

Please find enclosed responses to your questions. I hope this information will be helpful to you and your constituents.

Thank you again for your letter and interest in this important issue. Should you require any additional assistance, please have your staff contact the USCIS Office of Legislative Affairs at (202) 272-1940.

Respectfully,

A handwritten signature in blue ink, appearing to read "LFC", followed by a long horizontal flourish.

L. Francis Cissna  
Director

Enclosure

**U.S. Citizenship and Immigration Services Response to  
Representative Jamie Raskin's November 13, 2017 Letter**

**1. What is the length of the average application process? If the process varies by any factor (country of origin, age, etc.), please provide the average application processing times for each of these factors.**

U.S. Citizenship and Immigration Services (USCIS) generally attempts to provide a decision on all applications and petitions within 6 months (assuming no extended delays due to factors such as unresolved security checks or unexpectedly heavy demand.) Processing goals vary. For example, the goal for naturalization applications is 5 months, while the goal for employment authorization applications is 3 months. The average processing time is not affected by country of origin or age but by the length of time typically required to decide a particular immigration benefit request.

Factors that affect the decision cycle time include but are not limited to:

- Whether or not the application or petition requires an interview;
- The amount of time required to complete background checks, screening, and vetting; and
- Whether additional documentation is needed to complete the adjudication.

We have not met our processing time goals for several immigration benefit categories in recent years due, in part, to larger than expected receipts, increased complexity of the adjudicative process, and added background check and screening requirements. As of April 2018, our average processing time for the following forms was 10 months for Form N-400, Application for Naturalization; 10.4 months for Form I-485 Application to Register Permanent Residence or Adjust Status; 5.3 months for Form I-140 Immigrant Petition for Alien Worker (including premium and non-premium filed); 2.3 months for Form I-129, Petition for a Nonimmigrant Worker (including premium and non-premium filed); 4.2 months for Form I-765, Application for Employment Authorization; and 15.4 months for Form I-751, Petition to Remove Conditions on Residence.

**2. Has USCIS reviewed the U.S. citizenship application and naturalization process and identified what is causing the delays experienced by my constituents?**

USCIS continuously reviews the citizenship application and the naturalization process to identify efficiencies and deficiencies. A backlog has grown over the past fiscal year (FY), mainly due to:

- An increase in the overall volume of petitions/applications (FY 2017 up 6 percent from FY 2016, FY 2017 up 12 percent from FY 2015);
- The growing complexity and length of forms, new statutory and policy decisions, and increased security checks; and
- Logistical challenges faced in responding to the increase in workload due to hiring difficulties and/or facility constraints, at certain locations.

USCIS is currently taking actions to address the increased workload demands and backlogs such as:

- Implementing streamlining measures across the different workloads;
- Continuing to balance workloads between different locations based on their resource capacities;
- Piloting new methodologies to realign field office workloads to build capacity for increased interviews;
- Working to make additional resources available to the field by managing vacancies and leveraging overtime, staff details, workload prioritization, and other scheduling options; and
- Leveraging technology to strengthen background check and national security vetting, and automating adjudicative processes to reduce reliance on paper documents.

**3. Have any recommendations to speed up application processing times or improve efficiency in the system been identified by USCIS? If so, please provide a copy of these recommendations. Additionally, please identify which recommendations have been implemented, which ones you cannot implement, and which recommendations you plan to implement (including a timeline for the completion).**

USCIS has identified that additional efficiencies can be gained through technological advances, such as increased electronic processing and functionalities. USCIS has also deployed a number of services, including independent payment collection of certain filing fees. In the example of the Immigrant Fee payment for production of a new green card, the system executes the fee collection, processing, and payment reconciliation, card production, and subsequent notice generation.

Efficiencies have increased in the processing time for the green card replacement product line. Due to the incorporation of electronic features, such as Streamlined Processing (SP), USCIS is experiencing a significant reduction in the processing time for Form I-90 requests.

Additionally, Executive Order 13780, Protecting the Nation from Foreign Terrorists Entry into the United States, issued March 6, 2018, addresses the need to better identify foreign nationals who seek immigration benefits on a fraudulent basis, or who support terrorism, violent extremism or acts of violence, or who otherwise pose a risk of causing harm, thereby requiring programs consider enhancing in-person interviews. In evaluating these requirements, DHS and USCIS leadership expanded in-person interviews to include additional categories of applicants and petitioners not previously interviewed.

To the extent this increased workload of in-person interview of applicants and petitioners will not necessarily be supported by commensurate increases in staffing, achieving these objectives without adversely impacting current processing times and backlogs will require the USCIS Field Operations Directorate, which is responsible for conducting immigration benefit interviews, to realize significant efficiency gains throughout its operational processes. As mentioned above, those efforts are underway.

4. **If no recommendations have been made to improve the efficiency or speed of the application process, are there any thoughts or ideas you have that could allow USCIS to enable a speedier and more satisfactory application process?**

In addition to the initiatives mentioned above, USCIS promotes continuous process improvements.

5. **Are there any legislative measures that you could suggest to Congress to help improve processing times for my constituents and others who are working to become U.S. citizens?**

USCIS is available to provide technical assistance on any legislative proposals you may have regarding processing times or any other area in which USCIS has equity.