



OFFICE OF THE MAYOR
CITY OF CHICAGO

RAHM EMANUEL
MAYOR

July 30, 2018

The Honorable Lee Francis Cissna
Director
U.S. Citizenship and Immigration Services
20 Massachusetts Avenue NW
Washington, District of Columbia 20529

Re: Consistent Backlog of Citizenship Applications Before U.S. Citizenship and Immigration Services

Dear Director Cissna:

On behalf of the 729,400 lawful permanent residents ("LPRs") who are living in our cities and waiting, sometimes for as long as 20 months, for their citizenship applications to be processed, we respectfully urge you to significantly reduce the time that it is currently taking U.S. Citizenship and Immigration Services ("USCIS") to process citizenship applications.

The eligible LPRs waiting for their applications to be processed are residents of our cities, integral parts of our communities and families, and prosperous actors in our local, state, and federal economies. They have been in our country for many years and have completed all that has been asked of them in order to apply within the legal process that was envisioned by our nation's founders, enshrined in the Constitution, and codified in federal law.

Unfortunately, the enormous backlog of citizenship applications at USCIS is preventing at least 729,400 LPRs from accessing an equitable process to attempt to naturalize. The year of 2017 saw USCIS fail to naturalize more LPRs with pending applications than it actually naturalized, for the second year in a row.

And the problem is only getting worse. In the last two years, the backlog has increased by over 87 percent, despite the fact that citizenship applications have consistently decreased since April 2017. In just the last year, the backlog increased from 636,164 applications to the current backlog of 729,400 applications, despite a 25 percent decrease in applications submitted during that same time period. At the current rate, it would take USCIS over 25 years to get back down to the Obama administration's backlog level of 380,639 applications in 2015, and that is assuming no new applications. That is just not acceptable.

One impact of this enormous backlog is that the amount of time a person waits for their application to be processed by USCIS is arbitrary and lacks geographic uniformity. The amount of time a person waits is disparate among states and USCIS offices and sometimes even within a state or USCIS office. While it impacts people in different ways, the backlog consistently deprives eligible LPRs throughout the nation of a right that was created by the Constitution and a legal process that should uphold the values of fairness and equal treatment.

This is happening across the country. During 2017, Utah saw an increase of 53 percent; Texas saw an increase of 50 percent; Tennessee saw an increase of 47 percent; Washington saw an increase of 46 percent; and Kansas saw an increase of 44 percent. At the end of 2017, California had an application backlog of 137,538; Texas had an application backlog of 97,788; New York had an application backlog of 94,491; and Florida had an application backlog of 87,722.

Cities, and their USCIS field offices, are particularly impacted by these growing backlogs. At the end of March 2018, New York had a backlog of 81,206 applications; Houston had a backlog of 42,341 applications; Dallas had a backlog of 38,094 applications; San Francisco had a backlog of 27,481 applications; Chicago had a backlog of 27,238 applications; Newark had a backlog of 26,146 applications; Atlanta had a backlog of 21,006 applications; Baltimore had a backlog of 20,485 applications; Seattle had a backlog of 18,707 applications; Miami had a backlog of 17,955 applications; Los Angeles County had a backlog of 17,570 applications; Philadelphia had a backlog of 17,336 applications; St. Paul had a backlog of 16,762 applications; Los Angeles City had a backlog of 16,614 applications; and the District of Columbia had a backlog of 16,564 applications.

Moreover, at a time when USCIS appears to lack an adequate policy response to the citizenship application backlogs, the agency is actually going the opposite route and committing resources to stripping citizenship from naturalized Americans. The new measures to investigate thousands of cases from almost 30 years ago, under the pretext of the incredibly minimal problem of fraud in citizenship applications, instead of managing resources in a manner that processes the backlogs before them, suggests that the agency is more interested in following an aggressive political agenda rather than its own mission.

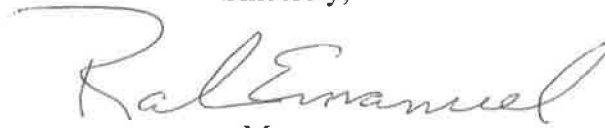
USCIS must be more accountable to the public that it serves and the values that it is supposed to promote. The consistent and growing backlog of citizenship applications shows a failure of the agency to live up to its mission statement “promise [of] efficiently and fairly adjudicating requests for immigration benefits while protecting Americans, securing the homeland, and honoring our values.”

As a result, we, the undersigned mayors and county executives, urge you to take aggressive steps to reduce the waiting time for processing citizenship applications down to six months, consistent with previous practice. We respectfully request a comprehensive and detailed plan describing how USCIS will achieve these objectives along with a commitment from local USCIS District Directors to share this plan with my colleagues across the country. We also respectfully request a listing and description of previous measures taken by the agency that had

the goal of reducing the backlog and an analysis of why they did not achieve their intended purpose.

As cities with immigrants and eligible LPRs who contribute so much to our communities, culture, and economy, we urge you to take aggressive action to end the backlog of citizenship applications and allow them the opportunity to join the nation as citizens.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ral Emanuel". The signature is fluid and cursive, with the first name "Ral" and last name "Emanuel" clearly distinguishable.

Mayor

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

September 4, 2018

The Honorable Rahm Emanuel
Mayor of Chicago
121 North LaSalle Street
Chicago City Hall 4th Floor
Chicago, Illinois 60602

Dear Mayor Emanuel:

Thank you for your July 30, 2018 letter regarding Form N-400, Application for Naturalization processing times. U.S. Citizenship and Immigration Services (USCIS) remains committed to timely and accurate adjudications. Additionally, we remain focused on process improvement and employee development while at the same time combatting instances of fraud, abuse, and other activities threatening the integrity of our nation's immigration system.

USCIS has experienced an increase in the number of pending naturalization applications and a subsequently elevated N-400 application cycle time. Both of these are the result of higher than projected application receipts in Fiscal Year (FY) 2017. Projected volume for FY 2017 was 853,292 and actual receipts were 986,460 which is 13.5 percent higher than we anticipated. Unlike the previous presidential election cycle where receipts dropped by 14 percent in the year following the election, they actually increased from FY 2016 to FY 2017.

Despite the increase in receipts over the last 2 years, USCIS has been able to increase N-400 application completion levels over those prior to FY 2016 without sacrificing the quality of our adjudications. In FY 2016, USCIS adjudicated approximately 829,000 naturalization applications and in FY 2017, USCIS adjudicated approximately 790,000 of them. These numbers are in line with previous fiscal years, and both years' totals are above the average for the 5 prior years.

USCIS remains focused on meeting a processing goal of 5 months for the Form N-400. We have not changed this goal and have continued to leverage available resources to improve wait times. Given the increase in filings in the recent past, reaching this goal in FY 2018 is simply not possible. We continue to add staff and seek to maximize use of our existing facilities where possible. In the last 3 fiscal years, USCIS Field Operations Directorate (FOD) has increased its use of overtime by approximately 65 percent. At the same time, we have expanded the authorized workforce for FOD by approximately 18 percent since FY 2015, and currently 96 percent of our authorized staffing positions are filled. We have initiated process redesign efforts to lower cycle times by identifying process efficiencies and quality enhancements and shifted adjudication priorities to address high priority caseloads. Additionally, in the past 2 years, USCIS opened three new field offices in Montgomery, Alabama; Nashville, Tennessee; and Fort Meyers, Florida and has expanded office space at 10 existing facilities.

We recognize the disparities in wait times across the country that you mention. Although there will always be some level of regional or local differences in wait times, our internal production planning models are built to ensure that we align our resources to minimize the disparities. We are currently looking at expanding or targeting the use of overtime and temporary personnel re-assignments for offices that are experiencing larger backlogs in an effort to more closely align processing times for N-400 applications across the country.

Thank you again for your letter and interest in this important issue. Should you wish to discuss this matter further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Francis Cissna". The signature is stylized with a large "L" and a long horizontal stroke.

L. Francis Cissna
Director