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SECTION 1: EXECUTIVE SUMMARY

1.1 INTRODUCTION

On March 20, 1997, the U.S. Department of Justice awarded a multi-year contract to PricewaterhouseCoopers (PwC), formerly Coopers & Lybrand, to reengineer the naturalization process. On September 30, 1997, PwC submitted a report that presented a blueprint for the redesigned naturalization process. Citizenship testing was one of the focal areas of the redesign.

In our September 1997 report and our subsequent *Testing Business Case and Implementation Plan*, we recommended INS develop citizenship tests with standard, meaningful, and credible content. As a starting point, we recommended INS do three things:

- • Define the objectives of testing;
- • Identify the body of information that all applicants should be expected to know with regard to U.S. history and government; and
- • Establish the minimum English proficiency that applicants for naturalization must demonstrate.

This report addresses each of these three topics. At the request of INS, we provide only options, not recommendations.

1.2 METHODOLOGY

PwC used a three-pronged approach to data collection. Specifically, we created two expert Consultation Groups, interviewed stakeholders, and conducted extensive research.

1.2.1 Consultation groups. We convened two Consultation Groups of subject matter experts. One group focused on history and government and the other on English. The members of both group were chosen to reflect diverse backgrounds, political perspectives, and expertise.¹ During separate two-day working sessions, the groups discussed the objectives of the new test, options for test content, and potential testing vehicles.

1.2.2 Key stakeholders. We spoke to a variety of stakeholders in Washington, D.C., and in site visits to Chicago, Houston, and San Francisco. We spoke with a total of 117 people, as reflected in the table below.

(stake)

Stakeholder Group	Number
Congressional representatives	7
CBOs (national representatives)	8
CBOs (field representatives)	40
Public	35
Field adjudicators	21
Field leadership	6
Total	117

¹ For cameo biographies of Consultation Group members and for Consultation Group charters, see Appendix A and B.



1.2.3 Research. We reviewed well over 210 documents representing over 3000 pages of material, including journal and newspaper articles, research papers, research studies, books, book reviews, test samples, and actual tests. In addition to working with the Consultation Groups and the stakeholders mentioned above, we also conducted over 40 interviews with linguists, industrial psychologists, and English, civics, and testing experts.

1.3 OBJECTIVES OF CITIZENSHIP TESTING

In order to determine the content of the new citizenship tests, INS must first determine the objectives of testing. We recommend the law as a starting point.

1.3.1 History and government. The law (Section 312 of the Immigration and Nationality Act) states that applicants must demonstrate:

"...a knowledge and understanding of the fundamentals of the history, and of the principles and form of government, of the United States."

The law is silent regarding what is meant by the term "fundamentals." Moreover, it is unclear whether or not the term "fundamentals" applies just to the history requirement or also to the government requirement.² To help INS determine what this phrase may mean, we solicited input from the stakeholders with whom we spoke.

"Basic" was the most frequent term used to define "fundamental." Congressional staff and the public suggested that, at a minimum, the "fundamentals" of history are the historical events or people that are directly related to the formation of the United States and our government. CBO representatives expressed a strong belief that applicants should not be expected to know more than average Americans. Several congressional staff members, on the other hand, believed that naturalized citizens should be held to a higher standard than native-born citizens.

out of 7

most? don't know

Many people and many events have played an *important* role in U.S. history. However, fundamental does not equate to important – fundamental is, in fact, a narrower measure. We recommend INS use this term to its advantage as a filter for screening historical facts. Judicious use of this filter will help facilitate the test development process. It will also ensure the body of knowledge applicants must learn is both reasonable and manageable.

1.3.2 English. The law also requires applicants demonstrate:

"...an understanding of the English language, including an ability to read, write, and ~~speak~~ words in ordinary usage in the English language: Provided, that the requirements of this paragraph relating to ability to read and write shall be met if the applicant can read ~~or~~ write simple words and phrases to the end that a reasonable test of his literacy shall be made..."

not both!

² Most of the people with whom we consulted believe it applies only to the history requirement, as the principles and form of U.S. government are more defined (e.g., more narrow in scope) than U.S. history. Consequently, we treat "fundamentals" as a descriptor of history only.



The law is silent on the meaning of “ordinary usage” and “simple words and phrases.” Again, to help operationalize this language, we solicited input from the stakeholders with whom we spoke. In summary, except for the adjudicators, there is general agreement between the various stakeholder groups regarding what “ordinary usage” and “simple words and phrases” mean. These phrases are both taken to mean the language necessary to meet basic needs and function on a daily basis, including:

- Communicating basic needs;
- Communicating basic personal information;
- Conducting “everyday” tasks, particularly those that involve exchanging money (e.g., shopping, banking); and
- Reading signs and labels.

Adjudicators, additionally argued that these phrases should include the English necessary to engage in the naturalization process (e.g., complete the N-400, participate in the interview, understand the Oath of Allegiance).

1.3.3 Conclusion. The law provides high-level objectives for naturalization testing. However, it leaves some room for interpretation. Consequently, INS has some flexibility (negotiable) regarding the content of the history and government test and the English proficiency level that applicants will need to demonstrate.

1.4 HISTORY AND GOVERNMENT TESTING OPTIONS

Once the objectives of testing are defined, it is possible to begin developing test content. In the case of history and government testing, this means identifying the body of knowledge that naturalization applicants must know and the depth of understanding that they must have.

1.4.1 Knowledge of history. Much work has already been done in the area of history standards. To leverage this work, we asked the Consultation Group to recommended existing sources that INS could use when identifying the fundamentals of U.S. history. They recommended the following:

- National Standards for History (revised version), created by the National Center for History in the Schools;
- History-Social Sciences Standards for California Public Schools;
- History and Social Science Standards of Learning for Virginia Public Schools;
- Massachusetts History and Social Science Curriculum Framework (Core Knowledge); and
- Texas Essential Knowledge and Skills for Social Studies.

Each of these resources identifies its own set of history “fundamentals.” By identifying recurring topics, INS can identify a minimum set of “fundamentals” that it can draw upon in developing the history test. In order to facilitate this analysis, we developed the fold-out matrix found in Section 5. We also included in the matrix, a sixth resource, the INS



Textbook entitled *United States History, 1600-1987*, as well as input we received from the Consultation Group and the public.

1.4.2 Knowledge of government. Much work has also already been completed in the area of government knowledge standards. Once again, we asked the Consultation Group to recommend existing sources that INS could use when developing a test of the principles and form of U.S. government. They recommended the following

- National Standards for Civics and Government / We the People: The Citizen and the Constitution (Center for Civic Education);
- Civics Framework for the 1998 National Assessment of Educational Progress – Basic levels (NAEP); and
- History and Social Science Standards of Learning for Virginia Public Schools.

In order to determine the recurring themes found in these existing standards/frameworks, we developed matrices that compare the content of each. For simplicity, we separated principles and form of government into two matrices. The matrices can be found in Section 5 (as color fold-outs). We also included in the matrices, a fourth resource, the INS Textbook entitled *U.S. Government Structure*, as well as input we received from the Consultation Group and the public.

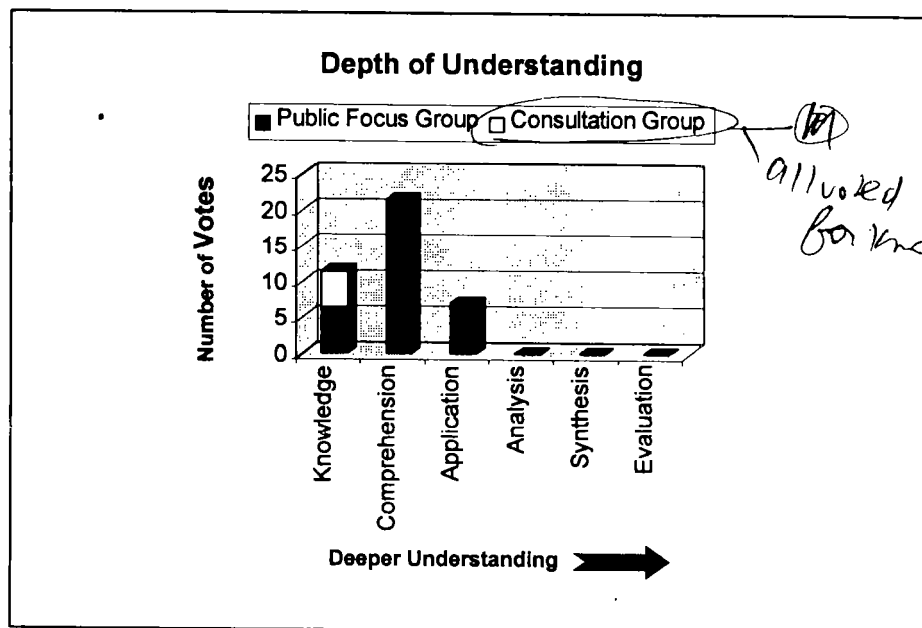
1.4.3 Depth of understanding. Once INS decides on the appropriate body of knowledge, it must decide what depth of understanding will be required of naturalization applicants. The History and Government Assessment Consultation Group identified a hierarchy of understanding, entitled “Bloom’s Taxonomy” that INS can use to help determine what the proper depth of understanding should be. This taxonomy is described in the table below:

Level	Description
Level 1: Knowledge	Knowledge is defined as the remembering of previously learned material. All that is required is the bringing to mind of the appropriate information.
Level 2: Comprehension	Comprehension is defined as the ability to grasp the meaning of material. This may be shown by explaining or summarizing material, and by estimating future trends. These learning outcomes represent the lowest level of understanding.
Level 3: Application	Application refers to the ability to use learned material in new and concrete situations. This may include the application of such things as rules, methods concepts, principles, laws, and theories.
Level 4: Analysis	Analysis refers to the ability to break down material into its component parts so that its organizational structure may be understood. Learning outcomes here represent a higher intellectual level than comprehension and application because they require an understanding of both the content and the structural form of the material.



Level 5: Synthesis	Synthesis refers to the ability to put parts together to form a new whole. This may involve the production of unique communication (theme or speech) or a plan of operations (research proposal). Learning outcomes in this area stress creative behaviors, with major emphasis on the formulation of new patterns or structure.
Level 6: Evaluation	Evaluation is concerned with the ability to judge the value of material (statement, novel, poem, research report) for a given purpose. Learning outcomes in this category are the highest in the cognitive hierarchy because they contain elements of all the other categories, plus conscious value judgments. ³

Using Bloom's Taxonomy, we asked the Consultation ^{not cons'l at all? no.} Group members and the public to vote on the level of understanding at which they think applicants should be tested, keeping in mind the context of the law. The chart below reflects the results of this poll:



1.5 ENGLISH TESTING OPTIONS

The law requires applicants to have an understanding of the English language, demonstrated by the ability to read, write and speak words in ordinary usage. The English Consultation Group recommended several existing proficiency guidelines that INS can consider when determining at what level naturalization applicants should read, write, and speak English:

- English-as-a-Second-Language, Model Standards for Adult Education Programs;

³ Source: www.uct.ac.za/projects/cbe/mcqman/mcqappc.html.



- Canadian Language Benchmark (CLB);
- Foreign Service Institute (FSI) / Interagency Language Roundtable (ILR) Proficiency Guidelines;
- Performance-Based Curricula and Outcomes—The Mainstream English Language Training Project (MELT) (*Speaking only*);
- Adult Rating of Oral English (AROE) (*Speaking only*); and
- Measure Definitions for the National Reporting System for Adult Education.

These guidelines are compared in the three fold-out matrices found in Section 6 (separate matrices are provided for reading, writing, and speaking).

1.6 HOW TO TEST

Once INS has made some determinations with regard to *what* it will test, we recommend it determine what test delivery methods to use and how to design specific test questions. In November, 1997, PwC submitted a Testing Options Report to INS. This report focussed largely on how to test, providing options for both test delivery methods and question structure (e.g. multiple choice, short answer, etc.). Section 7 of this report builds on our November 1997 report, as well as our subsequent research and the input of the Consultation Groups.

? more detail on the how

1.6.1 Testing methods. We believe there are four viable test delivery methods for INS to consider:

- Oral tests;
- Paper tests;
- Computer tests; and
- Profile screening.

pass a course?

Based on our research and input from the Consultation Groups, we believe all four options are viable for history and government testing. **Reading and writing** can also be tested via any of the four options (although if done orally, paper or computer support will be required – i.e., the applicant will need to be given something to read and something to write on). At this point, we believe that oral testing is the only way to assess speaking proficiency. In time, computer-based testing may be a suitable option, but given the current state of technology, it is not presently viable. Ultimately, the final decision on what testing method to use should be made after INS has determined the levels of English proficiency and civics knowledge that will be required of naturalization applicants.

1.6.2 Test question structure. We assessed the suitability of ten types of questions for naturalization testing. Some types of questions were clearly better than others. For example, multiple choice questions are comparatively easy to administer and can be constructed to assess a reasonable range of knowledge. However, multiple choice questions are not generally effective tools to determine an individual's ability to speak English. Based on our previous work and input from the Consultation Groups, the



following question structures seem most promising for the relevant components of naturalization testing:

(what is workable)

TEST COMPONENT	TEST QUESTION STRUCTURE					
	Multiple-choice	Matching	Short Answer	Dictation	Interpretive ⁵	Reading Aloud
History/Government	✓	✓	✓			
Reading	✓	✓	✓			✓
Writing			✓	✓	✓	
Speaking			✓		✓	

1.6.3 Testing scenarios. We asked the Consultation Groups to suggest possible test administration scenarios, using the previously discussed options on how to conduct testing and structure test questions. We compiled their suggestions into five brief testing scenarios, which are presented at the end of Section 7 of this report. These scenarios illustrate succinctly how testing can be conducted in a manageable and effective fashion.

1.7 NEXT STEPS

In order to develop a standard testing process, INS will need to identify a body of knowledge for history and government testing and establish minimum English proficiency levels. In addition, INS must determine when and where testing will be conducted, and who will conduct it. In Section 8, we provide a plan for addressing these issues, as well as supporting data to help inform INS's decisions.

⁴ During dictation testing, test-takers listen to a sentence or short passage read out loud and then write what they heard.

⁵ Interpretive questions employ visuals like pictures, graphs, and maps. Individuals are required to view the visuals and describe what they see. Interpretive questions can be answered in either written or verbal form.



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SECTION 2: INTRODUCTION

On March 20, 1997, the U.S. Department of Justice awarded a multi-year contract to PricewaterhouseCoopers (PwC), formerly Coopers & Lybrand, to reengineer the naturalization process. On September 30, 1997, PwC submitted a report that presented a blueprint for the redesigned naturalization process. Naturalization testing was one of the focal areas of the redesign.

The law (Section 312 of the Immigration and Nationality Act) requires that an applicant for naturalization demonstrate “an understanding of the English language, including an ability to read, write, and speak words in ordinary usage in the English language....” The law also requires an applicant demonstrate “a knowledge and understanding of the fundamentals of the history, and of the principles and form of government, of the United States....”

At present, an assessment of whether or not an applicant meets these requirements is made by INS adjudicators during the naturalization interview. PwC identified three pertinent findings regarding the current approach to testing in our September 1997 report and subsequent work:

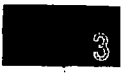
- There are no standard testing processes or protocols. How an applicant is tested depends on who conducts the interview.
- There is no standard test content.
- There are no defined passing standards. The level of proficiency or knowledge required for passing depends on the District where the interview is given, or in some cases, the adjudicator who conducts the interview. This inconsistency is a major complaint of applicants and advocacy groups.

In our September 1997 report and our subsequent *Testing Business Case and Implementation Plan*, we recommended INS develop tests with standard, meaningful, and credible content.

As a starting point, we recommended INS do three things. First, INS must define the objectives of testing. Next, INS must establish the minimum English proficiency that applicants for naturalization must demonstrate. Concurrently, INS must identify the body of information that all applicants should be expected to know with regard to U.S. history, principles, and form of government.

This report addresses each of these three topics. At INS's request, we provide only options, not recommendations. The remainder of the document is divided into the following sections:

- Section 3: Methodology
- Section 4: Objectives of Testing
- Section 5: History and Government Testing Options
- Section 6: English Testing Options
- Section 7: How to Test
- Section 8: Next Steps

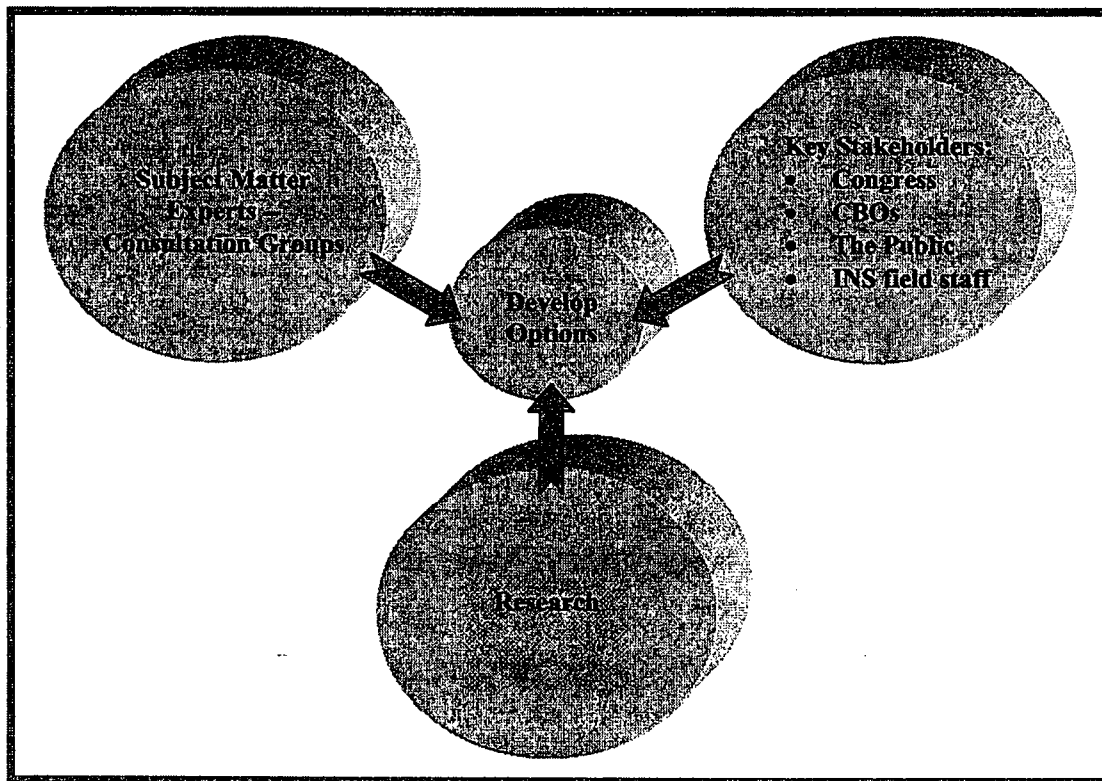


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SECTION 3: METHODOLOGY

As reflected below, PwC used a three-pronged data collection:



In the remainder of this section, each of these approaches is discussed in further detail.

3.1 SUBJECT MATTER EXPERTS

In November, we convened two consultation groups of subject matter experts. One group focused on history and government and the other on English.⁶

3.1.1 History and government. The first consultation group discussed the history and the principles and form of government of the United States. The members of this group were chosen to reflect diverse backgrounds, political perspectives, and expertise (including history and government expertise and experience in developing history and government standards). During a two-day working session, the group discussed the objectives of testing, options for test content, and potential testing vehicles.

3.1.2 English. The members of this group were also chosen to ensure diverse representation and expertise. The group was comprised of English as a Second Language (ESL) practitioners, as well as experts in literacy and linguistics. This consultation group focused on workable levels of English proficiency and on different ways of testing writing, speaking and reading.

⁶ For cameo biographies of the Consultation Group members and for Consultation Group charters, see Appendix A and B.



3.2 KEY STAKEHOLDERS

PwC conducted focus groups and interviews with many of the stakeholders in the testing process. During this effort, we spoke with a total of 117 people, as reflected in the table below.

Stakeholder Group	Number
Congressional representatives	7
CBOs (national representatives)	8
CBOs (field representatives)	40
Public	35
Field adjudicators	21
Field leadership	6
Total	117

3.2.1 Congress. We interviewed 7 Congressional staff members from both houses and both parties to obtain input about the new testing process. During these discussions, we met with staff members from the Senate Subcommittee on Immigration and the House Subcommittee on Immigration and Claims. We also conducted an "open" focus group for other interested staff members.

3.2.2 Community-Based Organizations (CBOs). In Chicago, Houston, and San Francisco, we conducted focus groups with CBOs. In total, we spoke with 40 CBO representatives. Additionally, we held two focus groups with national CBO representatives in Washington, DC.

3.2.3 Members of the public. We conducted two focus groups with members of the public in each of the three cities we visited (Chicago, Houston, and San Francisco). The participants were selected by professional market research firms. They were selected to be representative of the population living in the area where the working sessions were held. Consequently, they reflected a variety of ages, education levels, ethnic groups, occupations, and income levels.

3.2.4 INS field staff. In the three offices we visited, we spoke with 27 INS employees, including adjudicators, supervisors, and office leadership (e.g., citizenship supervisors, District Directors, and Deputy District Directors).

3.3 RESEARCH

In the course of this effort, we reviewed over 210 documents representing over 3000 pages of material, including journal and newspaper articles, research papers, research studies, books, book reviews, test samples, and actual tests. In addition to working with the Consultation Groups and the stakeholder mentioned above, we also conducted over 40 interviews with linguists, industrial psychologists, and English, civics, and testing experts.

info attached?
we have typed up notes - might be gone into the 11/77 report



3.4 COMPARISON OF EXISTING RESOURCES

There are a significant number of existing resources INS can draw upon when developing the new naturalization test. In Section 5 and 6, we present the most suitable resources in the form of options for INS's consideration.

3.4.1 History and government matrices. We asked the Consultation Group to recommend existing resources. After researching the resources they recommended, we created matrices to compare content. In general, the matrices reflect the main "topics" of each resource. We assumed that the most basic or fundamental subjects are reflected in the "chapter" headings of each resource. Consequently, a topic could be included in the body of an existing resource, but not reflected in the matrices we created. We also included input from the Consultation Groups and the public in the matrices.

3.4.2 English matrices. Again, we asked the Consultation Group to recommend existing resources and then created matrices to compare their content. We developed separate matrices for reading, writing, and speaking. In order to simplify the comparison, we also organized the matrices by low, medium, and high proficiency. Finally, we included input from the Consultation Groups and the public in the matrices.



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SECTION 4: OBJECTIVES OF TESTING

In order to determine the content of the new citizenship tests, INS must first determine the objectives of testing. We recommend the law as a starting point.

4.1 THE LAW – HISTORY AND GOVERNMENT TESTING OBJECTIVES

With regard to history and government requirements, the law states that applicants must demonstrate:

“...a knowledge and understanding of the fundamentals of the history, and of the principles and form of government, of the United States.”

The law is silent regarding what “knowledge” and what level of “understanding” is required. We address these issues in Section 5. The law is also silent regarding what is meant by the phrase “the fundamentals.” Moreover, it is unclear whether or not the phrase “the fundamentals” applies just to the history requirement or also to the government requirements. Most of the people with who we consulted believe it applies only to the history requirement, as the principles and form of U.S. government are more defined than U.S. history (e.g., more narrow in scope). Consequently, in the remainder of this report, we treat “the fundamentals” as a descriptor of history only.

To help INS determine what is meant by the phrase “the fundamentals,” we solicited input from a variety of sources, including the History and Government Assessment Consultation Group, the public, CBOs, and congressional staff members:

Consultation Group. The History and Government Assessment Consultation Group defined fundamental as the “basic events” of U.S. history, including such things as the Revolution, Civil War, and the civil rights movement.⁷

Key Word
Merriam/Webster Dictionary Definition:

Fundamental – serving as an original or generating source; primary; of central importance.

The Public. We asked participants in the public focus groups to define, in their own words, what the word “fundamental” means with regard to the law. Their definitions ranged from simple, “just the basics” to more detailed definitions like:

“Fundamentals of history to me would be the very basic or the core of how and why our country was founded. Additionally, those events that took place that led to the Civil War—the division of this country. [I] would [also] include the key presidents.”

Ultimately, most members of the public focus groups interpreted “fundamentals of history” as the basic events and people in history that shaped our nation.

⁷ Specific examples of “basic events,” as defined by the Consultation Group, are included in the fold-out entitled “A Comparison of Existing Resources and the Topic Covered (History)” in Section 5 of this report.



CBOs. Although our discussions with CBOs on this issue were limited, a two-fold definition of “fundamental” emerged:

- Very basic historical events; and
- Knowledge equal to or less than what ordinary citizens know.

Congress. The Congressional staff members with whom we spoke believed knowledge of history should be connected to civic participation. They believe that applicants should be tested upon things they need to know to participate in the political process.

The following table summarizes the definitions of “fundamental” provided by various stakeholder groups:

(Defns of objective)

Definitions of “the Fundamentals” of History			
Consultation Group	Public	CBO Representatives	Congress
• Basic events in American history (e.g., Revolution, Civil War, civil rights)	• What shaped our nation and our government • Historical events related to why and how the U.S. was founded • Historical events that affect us today	• Very basic historical events • <u>Equal to or less</u> than what the average American knows	• Basic historical facts • Major events related to the founding of the government • The things good citizens need to know • Meaningful information • <u>The same or more</u> knowledge than the average American

★ Not surprisingly, “basic” was ~~the most frequent term used to define “fundamental.”~~ Congressional staff and members of the public also suggested that at a minimum, “the fundamentals” of history are the historical events and people that are directly related to the formation of the United States and our government. CBO representatives expressed a strong belief that naturalization applicants should not be expected to know more than the average Americans. Several congressional staff members, on the other hand, believed that naturalized citizens should be held to a higher standard than native-born citizens.

★ Many people and many events have played an *important* role in U.S. history. However, fundamental does not equate to important – fundamental is, in fact, a narrower measure. We recommend INS use this term ~~to its advantage~~ as a filter for screening historical facts. Judicious use of this filter will help facilitate the test development process. It will also ensure the body of knowledge applicants must learn is both reasonable and manageable.





4.2 THE LAW – ENGLISH TESTING OBJECTIVES⁸

The statute requires applicants to demonstrate:

“...an understanding of the English language, including an ability to read, write, and speak words in ordinary usage in the English language: Provided, that the requirements of this paragraph relating to ability to read and write shall be met if the applicant can read or write simple words and phrases to the end that a reasonable test of his literacy shall be made...”

The law is silent on what is meant by “ordinary usage.” The law also places a limitation on reading and writing that it does not apply to speaking – it limits the literacy requirements to “simple words and phrases.” Just as the law is silent on the meaning of “ordinary usage,” it is also silent on the meaning of “simple words and phrases.” A review of the Congressional Records of the 82nd Congress (the Congress that drafted this section of the law) revealed virtually nothing to help define these terms. Although Section 312 is referenced several times in the Congressional Records, the Congress never defined or made reference to these phrases. As far as we could determine, no definitive guidelines or explanations exist to clarify the language of the statute. Perhaps intentionally, the lawmakers left room for interpretation and flexibility within the statute.

Key Words

Merriam/Webster Dictionary Definitions:

Ordinary – of a kind to be expected in the normal order of events, routine, usual.

Simple – readily understood.

To help INS determine what is meant by “ordinary usage” and “simple words and phrases,” we solicited input from a variety of sources, including the English Assessment Consultation group, the public, CBOs, adjudicators, and congressional staff members.

Consultation Group, the Public, and CBOs. In general, all three of these groups defined “ordinary usage” as the English needed to function in everyday life and to fulfill basic needs. The consultation group also believed that the phrase “simple words and phrases” is used to further define the phrase “English in ordinary usage” and does not create an additional burden on applicants. Examples of English that these groups believed fell within the purview of the law are included in the table below.

Adjudicators. The adjudicators had more varied views than the other groups. Some defined “ordinary usage” and “simple words and phrases” as the proficiency necessary to respond to background questions and questions about the N-400. Others defined “ordinary usage” as the language of street signs. Still others interpreted the law to mean the language required to participate in ordinary life activities such as shopping, banking, and going to the post office.

Congress. The congressional staff members we consulted generally felt that “simple words and phrases” and “ordinary usage” required only very basic English skills.

⁸ Please see Appendix C for the applicable section of the law in its entirety. Please see Appendix D for a history of naturalization laws, particularly those related to English, history, and government testing.



interesting - they realize this is higher than req'd by the law?
However, when they spoke about the English proficiency they believed applicants should have, they indicated a higher level of proficiency (e.g., enough proficiency to participate in the political process, to succeed economically, etc.).

The following table summarizes the definitions of "ordinary usage" and "simple words and phrases" provided by various stakeholder groups:

Definitions of "Ordinary Usage" and "Simple Words and Phrases"				
Consultation Group	Public	CBO Representatives	Adjudicators	Congress
- Function on a daily basis - Communicate basic personal information - Express opinions - Read stop signs - Read labels and warnings - Read and write short messages - Complete applications	- Meet basic needs (e.g., bathroom, food, etc.) - Use common everyday terms - Communicate phone numbers and addresses - Handle an emergency (e.g., police, fire, etc.) - Read <u>street signs</u> and maps and use transportation - Conduct financial exchanges (e.g., write <u>checks</u>, use banks) - Greet people - Express courtesy (e.g., please, excuse me) - Ask and answer basic questions (e.g., Where is...?, How much is...?)	- Participate in everyday conversations - Communicate regarding money - Communicate basic needs (e.g., food, work, directions) - Greet people - Communicate about work and personal life	- Read street signs - Complete a ballot - Complete "ordinary living" tasks (e.g., banking, shopping, etc.) - Complete the N-400 - Participate in the interview - Take the Oath of Allegiance	- Communicate ideas in basic sentences and phrases - Answer questions at interview - Read USA Today

★ ★
 In summary, except for the adjudicators, there is general agreement between the various stakeholder groups regarding what "ordinary usage" and "simple words and phrases" mean. These phrases are both taken to mean the language necessary to meet basic needs and function on a daily basis, including:

- Communicating basic needs;
- Communicating basic personal information;
- Conducting "everyday" tasks, particularly those that involve exchanging money (e.g., shopping, banking); and
- Reading signs and labels.

4.3 CONCLUSION

Section 312 of the law requires six things of applicants for naturalization. They must:

- ★* Read simple words and phrases words in ordinary usage in the English language;



- *Write* simple words and phrases words in ordinary usage in the English language;
- *Speak* words in ordinary usage in the English language;
- Know and understand the fundamentals of the *history* of the United States;
- Know and understand the *principles of government* of the United States; and
- Know and understand the *form of government* of the United States.

Through these six requirements, Section 312 provides high-level objectives for testing. Armed with an understanding of these objectives, in the next three sections, we provide options to INS for both test content and testing approaches.

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SECTION 5: HISTORY AND GOVERNMENT TESTING OPTIONS

5.1 INTRODUCTION

The law requires a knowledge and an understanding of the fundamentals of U.S. history and government. In the next section, we provide options vis-à-vis these requirements. The section is organized into four subsections:

- Considerations
- Body of Knowledge: Options – U.S. History
- Body of Knowledge: Options – Principles and Form of Government
- Depth of Understanding: Options

5.2 CONSIDERATIONS

5.2.1 What body of knowledge and what depth of understanding is required. We have shaped the following discussion of history and government testing around the requirements proscribed in Section 312 of the INA. The law requires both knowledge and understanding. Options for each of these are provided in Sections 5.3 through 5.5.

5.2.2 When does U.S. history begin and end. In order to determine the content of the U.S. history test, INS must decide when U.S. history begins. Does it begin with Greece, the Magna Carta, the European discovery of America, the history of Native Americans, colonization, etc.? Similarly, INS must address the issue of when U.S. history ends. Does it end with the civil rights movement, the Vietnam War, Watergate, the Reagan administration, etc.? To help make this decision, we refer INS to the fold-out entitled “A Comparison of Existing Resources and the Topics Covered (History)” in the next section.



5.3 BODY OF KNOWLEDGE: OPTIONS -- U.S. HISTORY

5.3.1 Options 1-6: Use existing standards/frameworks. We asked the Consultation Group to recommend existing sources that INS could use when identifying the fundamentals of U.S. history. The options we describe below are (1) consistent with the law, (2) created using a valid process, and (3) academically credible. The first five were also recommended by the Consultation Group:

- **Option 1:** National Standards for History (revised version), created by the National Center for History in the Schools;
- **Option 2:** History-Social Sciences Standards for California Public Schools;
- **Option 3:** History and Social Science Standards of Learning for Virginia Public Schools;
- **Option 4:** Massachusetts History and Social Science Curriculum Framework (Core Knowledge);
- **Option 5:** Texas Essential Knowledge and Skills for Social Studies; and
- **Option 6:** U.S. Department of Justice, Immigration and Naturalization Service Textbook, *United States History, 1600-1987*.

Each of these resources identifies its own set of history "fundamentals." By identifying recurring topics, INS can identify a minimum set of "fundamentals" that it can draw upon in developing the history test. In order to facilitate this analysis, we developed the matrix found on the following pages. This matrix compares content from the above resources, as well as input from our Consultation Group and the public.

It is important to note that each resource determines its requirements for learning differently. Some standards, like the Massachusetts History and Social Science Curriculum Framework, require knowledge of a subject without a specific grade level attached to it. Other standards, like the National History Standards, state their learning requirements in the grade spans of K-4 and 5-12. The rest of the history standards are more precise in their knowledge requirements and state the exact grade levels in which that topic must be covered.⁹ These differences are reflected in the matrix by the letter and number notations found in parenthesis.

Descriptions of each of the resources are provided after the matrix.

⁹ When each grade level has standards attached to it, only grades K-8 are reflected in the matrix.

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EXISTING RESOURCES — HISTORY																												* * * * *																											
																												Causes of the Civil War Civil War Reconstruction 13th/15th Amendments Jim Crow Laws Industrialization Social Change (Political/Quality of life) Immigration Rise of the American Labor Movement Populist Movement Foreign Policy/Isolationism Progressive Movement Social Change (Rural/American Policy) Women's Suffrage/19th Amendment Urbanization World War I Great Depression The New Deal World War II Post War US/Economic Boom Cold War - Korea/Vietnam Anti-Communism Effects of Increased Immigration Civil Rights Technological Change Watergate Contemporary US																											
																												1850-1877					1870-1900					1890-1930					1929-1945				1945-1970s				Post 1970				
National Standards for History (revised version) (National Center for History in the Schools)																												✓ (5-12)	✓ (5-12)	✓ (5-12)	✓ (5-12)		✓ (5-12)		✓ (5-12)	✓ (5-12)	✓ (5-12)	✓ (5-12)	✓ (5-12)		✓ (5-12)	✓ (5-12)	✓ (5-12)	✓ (5-12)	✓ (5-12)			✓ (5-12)	✓ (5-12)		✓ (5-12)	✓ (5-12)			
History-Social Sciences Standards for California Public Schools (K-8)																												✓ (6)	✓ (6)	✓ (6)			✓ (6)		✓ (6)			✓ (3,8)	✓ (8)			✓ (8)													
History and Social Science Standards of Learning for Virginia Public Schools																												✓ (4,5)	✓ (4,5)	✓ (4)	✓ (6)	✓ (4)	✓ (4,6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)	✓ (6)			✓ (6)	✓ (6)					
Massachusetts History and Social Science Curriculum Framework (Core Knowledge)																												✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Texas Essential Knowledge and Skills for Social Studies																												✓ (5,8)	✓ (5,7,8)	✓ (4,7,8)	✓ (5,8)			✓ (5,7)	✓ (5)		✓ (5)	✓ (7)	✓ (7)		✓ (4,5)	✓ (5,7)	✓ (5)		✓ (5,7)				✓ (5,7)	✓ (4)			✓ (7)		
United States History 1600-1987, Immigration and Naturalization Service, US Department of Justice																												✓	✓	✓			✓	✓	✓	✓	✓	✓	✓		✓		✓	✓		✓			✓	✓		✓			
History and Government Assessment Consultation Group Suggestions																												✓					✓	✓			✓			✓	✓	✓						✓	✓		✓	✓			
Public Focus Groups' Suggestions																													✓											✓		✓	✓	✓	✓		✓								

A COMPARISON OF EXISTING RESOURCES AND THE TOPICS COVERED (Principles of Government)

EXISTING RESOURCES — PRINCIPLES OF GOVERNMENT	Commonly Held American Values The Right to Life, Liberty and the Pursuit of Happiness Bill of Rights The Importance of Human Dignity Federalism Constitutionalism Popular Sovereignty/Democracy The Republican Form of Government Religious Freedom/Separation of Church and State The Judeo-Christian Ethic The Public or Common Good The American Identity The Competing Ideals of Government The Importance of the Individual The Importance of School, Community, State, and Nation The Importance of Equal Protection The Importance of Education The Importance of Work The Importance of Volunteerism The Importance of Justice The Importance of Equal Opportunity The Importance of Diversity The Importance of Openness and Free Inquiry The Importance of Truth The Importance of Honesty The Importance of Patriotism The Importance of Individual Responsibility The Importance of Respect for the Law Preventing and Managing Conflict Promoting the Rights of Others Self-discipline and Self-governance Respect for the Rights of Other Individuals The American Flag The Absence of Nobility																															
	Fundamental Principles																															
National Standards for Civics and Government and We the People: The Citizen and the Constitution (both by the Center for Civic Education)	✓ (K-4, 5-8)	✓ (5-8)		✓ (K-4, 5-8)		✓ (K-4, 5-8)	✓ (5-8)	✓ (5-8)	✓ (K-4, 5-8)	✓ (K-4)	✓ (5-8)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4)	✓ (K-4, 5-8)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4, 5-8)	✓ (5-8)
Civics Framework for the 1998 National Assessment of Educational Progress (NAEP)(Basic Levels)	✓ (4)									✓ (8)								✓ (4, 8)													✓ (4, 8)	✓ (8)
Standards of Learning for Virginia Public Schools History and Social Science Standards	✓ (3)	✓ (7)															✓ (3)	✓ (3)				✓ (4)									✓ (K, 1)	✓ (K, 1)
U.S. Government Structure, U.S. Department of Justice, Immigration and Naturalization Service	✓	✓		✓					✓								✓					✓			✓					✓	✓	
History and Government Assessment Consultation Group Suggestions		✓	✓	✓	✓	✓	✓										✓	✓		✓		✓										
Public Focus Groups' Suggestions		✓			✓		✓						✓				✓															

* = At Least 3 Checks

A COMPARISON OF EXISTING RESOURCES AND THE TOPICS COVERED (Principles of Government cont.)

EXISTING RESOURCES — PRINCIPLES OF GOVERNMENT	Citizenship Citizenship Gives an Individual Rights and Privileges Citizenship Gives an Individual Certain Responsibilities Social Contract Theory The Meaning of Citizenship How to Become a Citizen The Personal Rights of Citizens The Political Rights of Citizens The Economic Rights of Citizens The Personal Responsibilities of Citizens The Civic Responsibilities of Citizens The Different Forms of Political Participation What Political Leaders Do How Americans Select Leaders The Public Agenda Participating in Government (All Levels) Political Communication Political Parties and Elections Associations and Groups Distinguishing Between Public Life and Private Life Public Policy Formation and Implementation What Level of Government to Contact with a Problem The Qualities of a Good Leader People are the Source of Power																			
	Citizenship — Rights and Responsibilities										Participation									
	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (5-8)	✓ (K-4)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (5-8)	✓ (K-4, 5-8)	✓ (5-8)	✓ (5-8)	✓ (5-8)	✓ (5-8)	✓ (K-4, 5-8)
National Standards for Civics and Government and We the People: The Citizen and the Constitution (both by the Center for Civic Education)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (5-8)	✓ (K-4)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (5-8)	✓ (K-4, 5-8)	✓ (5-8)	✓ (5-8)	✓ (5-8)	✓ (5-8)	✓ (K-4, 5-8)
Civics Framework for the 1998 National Assessment of Educational Progress (NAEP) (Basic Levels)	✓ (8)	✓ (4,8)	✓ (4,8)		✓ (4,8)		✓ (8)	✓ (8)	✓ (8)	✓ (8)	✓ (8)	✓ (8)	✓ (8)	✓ (8)		✓ (4,8)	✓ (8)	✓ (8)	✓ (8)	✓ (4)
Standards of Learning for Virginia Public Schools History and Social Science Standards		✓ (2)	✓ (2)	✓ (K)					✓ (7)	✓ (7)	✓ (7)					✓ (7)			✓ (7)	
U.S. Government Structure, U.S. Department of Justice, Immigration and Naturalization Service		✓										✓	✓		✓					✓
History and Government Assessment Consultation Group Suggestions							✓	✓	✓											✓
Public Focus Groups' Suggestions											✓	✓	✓		✓					

* = At Least 3 Checks



- **The National Standards for History.** The *National Standards for History* were developed to achieve a broad national consensus regarding what constitutes excellence in the teaching and learning of history in schools across the country. Use of these standards is voluntary. The National Center for History in the Schools at the University of California at Los Angeles managed the development of these standards under the guidance of the National Council for History Standards. The National Endowment for the Humanities and the Department of Education funded the project and established three curriculum task forces totaling 50 members to develop the standards. Additionally, nine organizational focus groups of between 15 and 29 members each provided important advisory, review and consulting services to the project. An editorial team responded to recommendations from review groups and made final changes. The team received feedback and recommendations from several sources: (1) review copies released to the public, (2) public hearings, (3) information sessions at regional and national conferences, and (4) two panels, organized by the Council of Basic Education, with distinguished educators and public figures.¹⁰
- **The Commonwealth of Massachusetts, Department of Education, History and Social Science Curriculum Framework.** This is a state-wide framework for learning, teaching, and assessing history and social science in the Massachusetts public school system. The Massachusetts Department of Education appointed a History and Social Science Curriculum Framework Committee to develop this framework. The Committee produced and released several drafts of the document for written public comment. They received oral public comments during the Massachusetts Board of Education meetings and held focus groups in certain stages of the document's development to refine information.¹¹
- **Standards of Learning for Virginia Public Schools.** The *Standards of Learning for Virginia Public Schools* are academic standards that establish reasonable targets and expectations for what teachers need to teach and what students need to learn. Four school divisions in partnership with educators and citizens led the effort to develop these standards. In addition, they consulted national experts during the development phase. The developers obtained feedback and recommendations regarding the standards from several sources: (1) reviews and recommendations from parents, teachers, principals, school board members and community leaders, (2) advice from national experts, (3) feedback from public meetings, and (4) written comments.¹²
- **History-Social Science Education in California.** The California Academic Standards Commission developed the *History-Social Science Education in California* standards to serve as the basis for statewide assessments, curriculum frameworks, and instructional materials for grades 6 through 12. The *History-Social Science*

¹⁰ National Center for History in the Schools. (1996) *National Standards for History*.
www.sscnet.ucla.edu/nchs/hstocb.html.

¹¹ Personal Interview with Carol Thompson (Dec. 1998) The Commonwealth of Massachusetts Department of Education.

¹² Virginia Board of Education. (1995) *Standards for Learning in Virginia Public Schools*.
www.pen.k12.va.us/go/Sols/history.html.



Framework for California Public Schools served as a building block for this effort. The Commission established a History-Social Science Committee that examined a variety of established standards and compared them to the Commission's standards. The Commission hosted nine community-input meetings to help define key issues for the committee. During the development phase, the committee researched current practices and the state of history-social science instruction. The developers obtained feedback regarding the standards via several methods: (1) input from members of the California teaching community, as well as other citizens, (2) surveys administered to California school districts, (3) written comments from experts on the first and second drafts, (4) working sessions to obtain concentrated teacher input on standards, and (5) two rounds of public hearings throughout the state.¹³

- **Texas Essential Knowledge and Skills (TEKS) for Social Studies.** The Texas Legislature mandated the Texas State Board of Education to establish educational standards. The Board of Education then approved the process for the Texas Education Agency to develop the *Texas Essential Knowledge and Skills (TEKS)*. This process required developing standards in a variety of subject areas, one of which was Social Studies. The Texas Education Agency formed writing teams for each subject matter area and then subcontracted out the management of these teams to the Regional Education Service Center. These writing teams were comprised of teachers, administrators, business people, parents and other community representatives. The writing teams prepared a first draft using such source documents as Central Elements, National Standards and other state curricula, and forwarded it to educators for review. Using a survey to collect feedback, the teams incorporated the comments into the TEKS Social Studies document. The writing team prepared a second draft and posted it for public comment, again using a survey to solicit feedback. The revised document was presented to the Texas State Board of Education that, in-turn, requested the standards be forwarded to designated historians and education experts for comment. The Texas Education Agency incorporated the experts' comments into the standards and again presented it to the Board of Education. The Texas Board of Education revised the TEKS for Social Studies twice before adopting them.¹⁴
- **U.S. Department of Justice, Immigration and Naturalization Service, United States History, 1600-1987.** INS developed this textbook as a study aid for people seeking to become naturalized. INS contracted the research and writing of this book to Miranda & Associates. The contractor hired a history professor to draft the book. Once drafted, the contractor solicited comments from a variety of interested parties across the nation. In addition INS officials and field practitioners reviewed the book and their comments and suggestions were incorporated into the text.¹⁵

¹³ *History-Social Science Education in California*. www.ca.gov/goldstandards/Drafts/HSS/HSSIntro.html.

¹⁴ Personal Interview with Cynthia Levenson (Dec 1998), Texas Education Agency, Office of Curriculum and Professional Development.

¹⁵ U.S. Department of Justice, Immigration and Naturalization Service. *United States History, 1600-1987* Washington, DC: U.S. Government Printing Office, 1987.



5.3.2 Stakeholder input. In addition to input from the public and the Consultation Group (which is reflected in the last two rows of the matrix), we also solicited input from CBOs, INS field staff, and Congressional staff:

INS field staff. Most INS field staff felt that the existing 100 questions are fine.¹⁶ They believed that any changes to the existing 100 questions should simplify the language and reduce the ability to memorize the answers without understanding what the information actually means.

CBOs. CBOs generally felt that applicants should know very basic historical events, as well as basic information in support of assimilating into American society. CBO representatives were wary of requiring new citizens to know more about U.S. history than native-born citizens.

Congress. All the Congressional staff with whom we spoke expressed the desire for INS to create a more meaningful test. Congressional staffers suggested that applicants for naturalization should know the basic history of the country. At a minimum, they suggested that applicants should know the major events related to the founding of the country. Most believed that INS should require applicants to know more than the average American.

¹⁶ As part of the "Legalization Program," INS developed a set of 100 history and government questions. Various versions of these questions are currently used by many adjudicators as a basis for testing naturalization applicants.



5.4 BODY OF KNOWLEDGE: OPTIONS -- PRINCIPLES AND FORM OF GOVERNMENT

The law requires that applicants know and understand the principles and form of the US government. The History and Government Assessment Consultation Group interpreted “principles” to be the underlying concepts and tenets on which the United States was founded and under which it operates. An example of a principle of the United States Government is separation of church and state. The group interpreted “form” of government to mean the structure of government, for instance that the federal government is comprised of three branches.

5.4.1 Options 1-4: Use existing standards/frameworks. We asked the Consultation Group to recommend existing sources that INS could use when crafting a test of the principles and form of U.S. Government. As with the history options, the four options we describe below are (1) consistent with the law, (2) created using a valid process, and (3) academically credible. They include:

- **Option 1:** National Standards for Civics and Government / We the People: The Citizen and the Constitution (Center for Civic Education);
- **Option 2:** Civics Framework for the 1998 National Assessment of Educational Progress – Basic levels (NAEP);
- **Option 3:** History and Social Science Standards of Learning for Virginia Public Schools; and
- **Option 4:** U.S. Department of Justice, Immigration and Naturalization Service, *U.S. Government Structure*.

In order to determine the recurring themes found in these existing standards/frameworks, we developed the matrices on the following pages. For simplicity, we separated principles and form of government into two matrices. The matrices reflect the four options above, as well as input from the consultation group and the public focus groups.

As with the history matrix, each resource determines its requirements for learning differently. These differences are reflected in the matrices by the letter and number notations found in parenthesis. Descriptions of each resource are provided after the matrices.

A COMPARISON OF EXISTING RESOURCES AND THE TOPICS COVERED (Form of Government)

EXISTING RESOURCES — FORM OF GOVERNMENT																								
	Constitution												Federal Government								Legislative Branch			
National Standards for Civics and Government Textbook: We the People: The Citizen and the Constitution) (Center for Civic Education)	✓ (5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (5-8)	✓ (K-4)	✓ (5-8)	✓ (K-4, 5-8)	✓ (K-4)		✓ (5-8)	✓ (5-8)	✓ (5-8)	✓ (5-8)	✓ (5-8)	✓ (K-4)	✓ (K-4)	✓ (K-4, 5-8)	✓ (K-4, 5-8)		✓ (5-8)	✓ (5-8)	✓ (5-8)	✓ (K-4)	✓ (K-4)
Civics Framework for the 1998 National Assessment of Educational Progress (NAEP)(Basic Levels)		✓ (4, 8)	✓ (4, 8)			✓ (8)	✓ (4)		✓ (8)		✓ (8)	✓ (8)			✓ (4)	✓ (4)		✓ (4)	✓ (8)	✓ (4)		✓ (4)		
Standards of Learning for Virginia Public Schools History and Social Science Standards	✓ (5)	✓ (5)	✓ (5)				✓ (7)			✓ (5, 7)	✓ (5, 7)	✓ (7)										✓ (5, 7)		✓ (7)
U.S. Government Structure, U.S. Department of Justice, Immigration and Naturalization Service		✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓		✓		✓	✓				✓	✓	✓
History and Government Assessment Consultation Group Suggestions									✓	✓		✓										✓	✓	✓
Public Focus Groups' Suggestions						✓			✓		✓	✓								✓	✓			✓

* = At Least 3 Checks

A COMPARISON OF EXISTING RESOURCES AND THE TOPICS COVERED (Form of Government cont.)

EXISTING RESOURCES — FORM OF GOVERNMENT																								
	Executive Branch				Judicial Branch				State Government				Local Government				Law							
National Standards for Civics and Government Textbook: We the People: The Citizen and the Constitution (Center for Civic Education)	✓ (5-8)	✓ (K-4)	✓ (K-4)	✓ (K-4)	✓ (5-8)	✓ (K-4, 5-8)	✓ (K-4)	✓ (K-4)	✓ (K-4, 5-8)	✓ (K-4)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)	✓ (K-4, 5-8)
Civics Framework for the 1998 National Assessment of Educational Progress (NAEP)(Basic Levels)	✓ (4)				✓ (4)				✓ (4, 8)	✓ (4)					✓ (4)						✓ (4)			
Standards of Learning for Virginia Public Schools History and Social Science Standards	✓ (5, 7)			✓ (7)	✓ (5, 7)		✓ (7)	✓ (7)	✓ (7)	✓ (7)	✓ (5)		✓ (7)						✓ (7)					
U.S. Government Structure, U.S. Department of Justice, Immigration and Naturalization Service	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			
History and Government Assessment Consultation Group Suggestions	✓	✓	✓		✓	✓	✓																	
Public Focus Groups' Suggestions	✓			✓	✓				✓			✓	✓				✓	✓	✓	✓				

* = At Least 3 Checks



- **National Standards for Civics and Government.** The *National Standards for Civics and Government* were established by the Center for Civic Education to “help schools develop competent and responsible citizens who possess a reasoned commitment to the fundamental values and principles that are essential to the preservation and improvement of American constitutional democracy.” The standards are voluntary and were developed for kindergarten through grade 12, for use in schools across the country. The Center for Civic Education held 150 open hearings and public discussions to develop the standards. The Center also called upon existing committees and review panels to provide comments and suggestions to manuscripts at various stages of development. In addition, teachers, other educators, scholars, parents, elected officials and representatives of public and private organizations provided critical input. Worldwide civic education leaders were also consulted regarding the standards-setting process.¹⁷
- **Civics Framework for the 1998 National Assessment of Educational Progress (NAEP Civics).** The *Civics Framework for the 1998 National Assessment of Education Progress (NAEP Civics)* was developed by The National Assessment Governing Board, under contract with the Council of Chief State School Officers, and in conjunction with the Center for Civic Education and the American Institutes for Research. The initiative produced a national framework for teaching/learning the essential knowledge and skills about democratic citizenship and government. It covers grades 4, 8 and 12. The initiative drew heavily upon the voluntary *National Standards for Civics and Government* as a resource. A Consensus Committee of broad-based groups, including scholars, state and local educators, civics leaders, and interested members of the public was established. A Steering Committee comprised of participants from major education and policy organizations, as well as business and government agencies convened to oversee and guide the development of the framework. Additionally, a Project Management Team administered and supervised the work of the project. To obtain feedback and recommendations regarding the framework, the committees: (1) solicited written reviews, (2) held public hearings, and (3) held student forums.¹⁸
- **Standards of Learning for Virginia Public Schools.** The *Standards of Learning for Virginia Public Schools* are academic standards that establish reasonable targets and expectations for what teachers need to teach and what students need to learn. Four school divisions, in partnership with educators and citizens, led the effort to develop these standards. In addition, they consulted national experts during the development phase. The developers obtained feedback and recommendations regarding the standards from several sources: (1) reviews and recommendations from parents, teachers, principals, school board members and community leaders, (2) advice from national experts, (3) feedback from public meetings, and (4) written comments.¹⁹

¹⁷ Center for Civics and Education (1994) *National Standards for Civics and Government*.

¹⁸ Civics Framework for the 1998 National Assessment of Educational Progress (1998).

¹⁹ Virginia Board of Education.(1995) *Standards for Learning in Virginia Public Schools*; www.pen.k12.va.us/go/Sols/history.html.



- **U.S. Department of Justice, Immigration and Naturalization Service, U.S. Government Structure.** *U.S. Government Structure* was developed as a study aid for people seeking to become citizens of the United States of America by preparing to take the naturalization examination. INS contracted the research and writing of this book to Miranda & Associates. The contractor hired a history professor to draft the content. Once drafted, INS solicited comments from a variety of interested parties across the nation. In addition, INS officials and field practitioners reviewed the content and provided suggestions that were incorporated into the text.²⁰

5.4.2 Option 5: Use “source documents.” The consultation group suggested another option for determining what applicants should know about the principles and form of U.S. government. They suggested INS consider going back to “source documents” to identify key information on the principles and structure of government. The source document approach suggests that the entire body of knowledge for government can be derived from some key source documents. All other resources are derivative and reflect information originally found in these documents. This approach may require the duplication of work previously completed by other organizations. For example, options 1-5 are largely built upon source documents. The consultation group provided the following list of “source documents:”

- Declaration of Independence;
- The Federalist Papers;
- Constitution--Bill of Rights;
- George Washington’s Farewell Address;
- Emancipation Proclamation;
- Gettysburg Address;
- Oath of Allegiance;
- John F. Kennedy’s Inaugural Address; and
- Martin Luther King, Jr.’s Letter from Birmingham Jail or I Have a Dream speech

5.4.3 Stakeholder input. In addition to input from the public and the Consultation Group (which is reflected in the last two rows of the matrices), we also solicited input from CBOs, INS field staff, and Congressional staff. Almost all of the stakeholders we contacted felt that at a minimum the principles and form of government component of the test should include the information applicants need to be effective citizens and to appreciate the rights and freedoms central to the United States. Adjudicators also felt that the government portion of the citizenship test should include things connected to the naturalization process -- for example, the importance of attachment to the Constitution and the Oath of Allegiance.

²⁰ U.S. Department of Justice, Immigration and Naturalization Service. *U.S. Government Structure*. Washington, DC.: U.S. Government Printing Office, 1987.



5.5 DEPTH OF UNDERSTANDING: OPTIONS

Once INS decides on the appropriate body of knowledge, it must determine what depth of understanding will be required of naturalization applicants. The same body of knowledge can be tested with varying depths of understanding. For instance, an applicant can be expected to know that freedom of speech is included in the Bill of Rights, or can be tested on the importance of free speech in our society, or can further be asked to apply the principle of free speech to a relevant court case, etc.

The History and Government Assessment Consultation Group identified a hierarchy of understanding, entitled “Blooms Taxonomy” that INS can use to help determine what the proper depth of understanding should be.

5.5.1 Bloom’s Taxonomy. In 1956, Benjamin Bloom, along with a group of other educational psychologists, developed a system of classifying the goals of the educational process. Bloom defined three domains of educational activities, the cognitive, psychomotor, and affective. The cognitive domain is the first of the three domains and speaks to the acquisition of knowledge and the development of intellectual attitudes and skills. Bloom further defined the cognitive domain by developing a hierarchy of educational objectives, known as Bloom’s Taxonomy. Bloom’s Taxonomy divides the cognitive domain into six categories. Each category defines a specific ability to grasp and manipulate information, building upon the previous category.²¹ Although developed over 40 years ago, Bloom’s taxonomy is easily understood and widely accepted.

The six categories of “understanding” as defined by Bloom are described below:

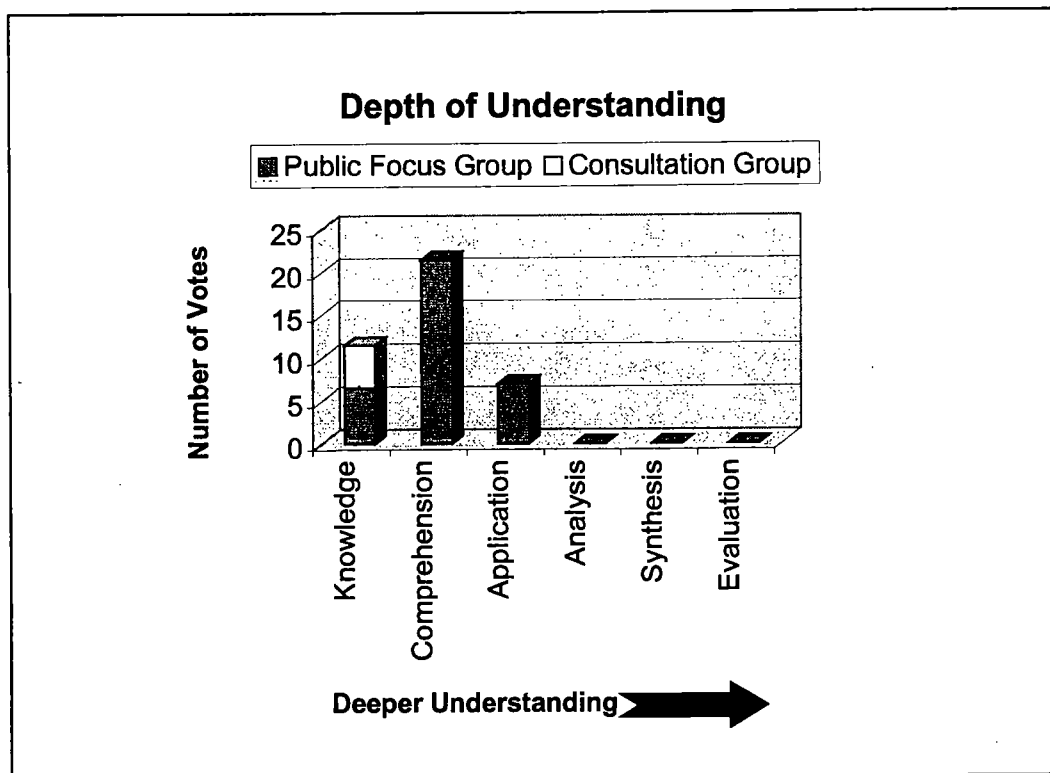
Level	Description
Level 1: Knowledge	Knowledge is defined as the remembering of previously learned material. This may involve the recall of a wide range of material, from specific fact to complete theories, but all that is required is the bringing to mind of the appropriate information. Knowledge represents the lowest level of learning outcomes in the cognitive domain.
Level 2: Comprehension	Comprehension is defined as the ability to grasp the meaning of material. This may be shown by translating material from one form to another (words to numbers), by interpreting material (explaining or summarizing), and by estimating future trends (predicting consequences or effects). These learning outcomes go one step beyond the simple remembering of material, and represent the lowest level of understanding.
Level 3: Application	Application refers to the ability to use learned material in new and concrete situations. This may include the application of such things as rules, methods concepts, principles, laws, and theories. Learning outcomes in this area require a higher level of understanding than those under comprehension.
Level 4: Analysis	Analysis refers to the ability to break down material into its component parts so that its organizational structure may be understood. This may include the identification of parts, analysis of relationship between parts, and recognition of the organizational principles involved. Learning outcomes here represent a higher intellectual level than comprehension and application because they require an understanding of both the content and the structural form of the material.

²¹ Longman Inc., New York (1956) *Taxonomy of Educational Objectives, Book 1 Cognitive Domain*.



Level 5: Synthesis	Synthesis refers to the ability to put parts together to form a new whole. This may involve the production of unique communication (theme or speech), a plan of operations (research proposal), or a set of abstract relations (scheme for classifying information). Learning outcomes in this area stress creative behaviors, with major emphasis on the formulation of new patterns or structure.
Level 6: Evaluation	Evaluation is concerned with the ability to judge the value of material (statement, novel, poem, research report) for a given purpose. The judgments are to be based on definite criteria. These may be internal criteria (organization) or external criteria (relevance to the purpose) and the student may determine the criteria or be given them. Learning outcomes in this category are the highest in the cognitive hierarchy because they contain elements of all the other categories, plus conscious value judgments based on clearly defined criteria. ²²

5.5.2 Stakeholder Input. Using Bloom's Taxonomy, we asked the Consultation Group members and the public to vote on the level of understanding at which they think applicants should be tested, keeping in mind the language of the law. The chart below reflects the results of this poll:



While we did not ask congressional representatives, CBO representatives, or field employees to explicitly vote on what level of understanding they believed was most appropriate for citizenship testing, we did discuss this issue. Based on our discussions

²² Source: www.uct.ac.za/projects/cbe/mcqman/mcqappc.html.



with these groups, we identified the level or levels of understanding described in Bloom's Taxonomy that we believe corresponds with each stakeholder group's recommendations.

CBOs. Many CBO representatives were concerned with the meaningfulness of the history and government test and with the applicants' learning process. This group was one of the biggest proponents of creating a study guide that immigrants can use to prepare for the citizenship test. Unlike the congressional representatives who believed that it was most important for immigrants to be able to participate in governance, CBOs were most concerned with immigrants' ability to function in society. This level of knowledge corresponds with Level 1, Knowledge, and Level 2, Comprehension, of Bloom's Taxonomy.

Adjudicators. Adjudicators were largely concerned with the effects of memorization in the current testing process and believed applicants should not be able to pass a citizenship test through pure memorization. This requirement equates to Level 2 of Bloom's Taxonomy. However, adjudicators also believed that the citizenship test should cover topics relative to the naturalization process, like the meaning of the Oath of Allegiance and attachment to the Constitution. This requirement shifts adjudicator input up to Level 3 of Bloom's Taxonomy.

Congress. Most of the congressional representatives with whom we spoke believed that the level of understanding of history and government should be sufficient enough to enable applicants to participate in our political system. We estimate that this level of understanding corresponds with Level 3, Application, of Bloom's Taxonomy.

5.6 CONCLUSION

The law requires "a knowledge...of the fundamentals of the history, and of the principles and form of government, of the United States." There are a variety of existing resources that INS can draw upon when determining the body of knowledge that will form the basis of history and government testing. Each of the resources described in this section was developed through a credible process and, with some adaptation, could serve as a basis for naturalization testing. Alternatively, INS could use some combination of these resources to serve as a foundation for naturalization testing.

The law requires understanding, as well as knowledge. To help determine what level of understanding should be required, we solicited input from key stakeholders. The Consultation Group and CBOs believed that the law required a level of understanding equivalent to Level 1 in Bloom's taxonomy (i.e., remembering previously learned material). The public generally felt that Level 2 was appropriate (i.e., grasping the meaning of material). Adjudicators and Congressional staff were inclined towards Level 3 (i.e., using learned material in new and concrete situations).

**PHOTOCOPY
PRESERVATION**



APPENDIX B: ENGLISH ASSESSMENT CONSULTATION GROUP CHARTER AND ABBREVIATED BIOGRAPHIES

CHARTER

Introduction. As part of a larger reengineering project, Coopers & Lybrand, L.L.P (a precursor firm to PricewaterhouseCoopers) recommended that the citizenship testing program be redesigned. The Department of Justice (DOJ), the Immigration and Naturalization Service (INS), and PricewaterhouseCoopers (PwC) all concur that the first step in this challenging process is to bring together a group of subject matter and testing experts to advise and confer with PwC.

Background. 8 U.S.C. 1423 (Section 312 of the INA) requires applicants to demonstrate "an understanding of the English language, including an ability to read, write, and speak...simple words and phrases...in ordinary usage in the English language...." The law is silent regarding *what* is meant by "simple words and phrases...in ordinary usage." It is also silent on *how* INS should determine whether an applicant meets the English requirements. Although it does require that any literacy test be "reasonable."

PwC and INS are interested in learning how experts in the field of English education and linguistics interpret the statutory language and what level of English proficiency they believe should be expected of new citizens. Ultimately, this information will support the development of a standard English assessment program.

Key Questions. The first step toward developing a standard English assessment program is to address the following set of basic questions:

1. What are the objectives of the English requirement of 8 U.S.C. 1423 (Section 312 of the INA)?
2. Given these objectives, what reading, writing, and speaking proficiency should be required of applicants?
3. What is the best way to determine whether an applicant has met these English requirements?

Consultation Group Mission. The Consultation Group will work in an advisory capacity with PwC to begin to address questions 1 and 2 above. Question 3 will also be considered as it informs questions 1 and 2. However, most of the work associated with addressing question 3 will be done through a contractor. The Consultation Group will not develop or recommend a single answer, but rather, will provide options and supporting information to PwC to, in turn, present to DOJ and INS for consideration.

Level of Effort. C&L will conduct approximately three full-day working sessions with the Consultation Group over a three month period



ENGLISH ASSESSMENT CONSULTATION GROUP ABBREVIATED BIOGRAPHIES

Bill Bliss is with the Language & Communication Association. He is co-author of a 5-level ESL series from Prentice Hall for pre-beginning to advanced ESL learners. He is also co-author of Voices of Freedom English/Civics for the U.S. Citizenship Exam.

Allene Grognet is affiliated with the Center for Applied Linguistics (CAL). She is an expert on citizenship testing and also focuses on improving the teaching of English as a Second Language, language and literacy in the workplace, language acquisition, and language proficiency testing.

Inaam Mansoor is the director of the Arlington County, Va Adult Education program. She is very knowledgeable on English language acquisition by non-native speakers and is involved in various national English language proficiency programs.

Elaine Baush is affiliated with the Fairfax County, Va Adult ESL program. She is very knowledgeable on English language acquisition by non-native speakers.

Aliza Becker is a Chicago-based consultant who works on immigration and education issues, and is affiliated with the Equipped for the Future Initiative. She has written two books on citizenship and two forthcoming ESL textbooks on immigrant rights and citizenship.

Follow-up Interview:

Frances Butler is a project director and expert in language issues in testing with the Center for Research on Evaluation, Standards, and Student Testing (CRESST). Funded by the U.S. Department of Education, CRESST conducts research on topics related to K-12 educational testing. Dr. Butler helped determine the academic standards for the Los Angeles Unified School District.



APPENDIX C: SECTION 312 OF THE IMMIGRATION AND NATIONALITY ACT

312 REQUIREMENTS AS TO UNDERSTANDING OF THE ENGLISH LANGUAGE, HISTORY, PRINCIPLES, AND FORM OF GOVERNMENT OF THE UNITED STATES

SEC. 312. [8 U.S.C. 1423]

(a) No person except as otherwise provided in this title shall hereafter be naturalized as citizen of the United States upon his own application who cannot demonstrate—

- (1) an understanding of the English language, including an ability to read, write, and speak words in ordinary usage in the English language: Provided, That the requirements of this paragraph relating to ability to read and write shall be met if the applicant can read or write simple words and phrases to the end that a reasonable test of his literacy shall be made and that no extraordinary or unreasonable conditions shall be imposed upon the applicant; and
- (2) a knowledge and understanding of the fundamentals of the history, and of the principles and form of government, of the United States.

(b)(1) The requirements of subsection (a) shall not apply to any person who is unable of physical or developmental disability or mental impairment to comply herewith.

(2) The requirement of subsection (a)(1) shall not apply to any person who, on the date of the filing of the person's application for naturalization as provided in section 334, either--

(A) is over fifty years of age and has been living in the United States for periods totaling at least twenty years subsequent to a lawful admission for permanent residence, or

(B) is over fifty-five years of age and has been living in the United States for periods totaling at least fifteen years subsequent to a lawful admission for permanent residence.

(3) The Attorney General, pursuant to regulations, shall provide for special consideration, as determined by the Attorney General, concerning the requirement of subsection (a)(2) with respect to any person who, on the date of the filing of the person's application for naturalization as provided in section 334, is over sixty-five years of age and has been living in the United States for periods totaling at least twenty years subsequent to a lawful admission for permanent residence.

IMMIGRATION AND NATURALIZATION LAWS

Act of March 26, 1790

One of the powers given to Congress in the Constitution is to prescribe a uniform rule of naturalization. The legislators began early, enacting the first naturalization statute and setting the residence requirement at 2 years.

Act of January 29, 1795

- Repealed the 1790 Act, raised the residence requirements to 5 years and required a declaration to seek citizenship at least 3 years before naturalization.
- Additional requirements added: good moral character, **attachment to the principles of the Constitution**, and favorable disposition toward the good order and happiness of the United States.
- Requirement that the applicant must renounce allegiance to foreign sovereignty.

Naturalization Act of June 18, 1798

- Raised the residence requirements for naturalization to 14 years

Naturalization Act of April 14, 1802

- Reduced the residence period for naturalization from 14 to 5 years.—
- Established these requirements for naturalization: good morale character, **allegiance to the Constitution**, a formal declaration of intention, and witnesses.

Steering Act of March 3, 1819

- First significant Federal law relating to immigration.
- Established immigration reporting requirements and restricted the number of passengers on all vessels either coming to or leaving the United States.

Naturalization Act of July 14, 1870

- Established a system of controls on the naturalization process and penalties for fraudulent practices.
- Extended the naturalization laws to aliens of African nativity and descent.

Passenger Act of March 3, 1855

- Reaffirmed the duty of the captain of any vessel to report the arrival of alien passengers, and established separate reporting to the Secretary of State distinguishing permanent and temporary immigration.

Act of March 1875

Established the policy of direct federal regulation of immigration by prohibiting for the first time entry of undesirable immigrants:

- excluded criminals (other than political offenders) and prostitutes from admission.

Immigration Act of August 3, 1882

Congress assumed the power to control immigration when it reluctantly passed the first general immigration law:

- idiots, lunatics, persons likely to become a public charge and criminals (other than political offenders) should be denied admission.

Act of February 26, 1885

The first "Contract Labor Law", made it unlawful to import aliens into the United States for performance of labor services of any kind. Exceptions were provided for aliens temporarily in the United States engaging other foreigners as secretaries, servants, or domestics. Also exempt were actors, artists, lecturers and domestic servants and skilled aliens working in an industry not yet established in the United States.

Immigration Act of March 3, 1891

The first general immigration statute for national control of immigration:

- established Bureau of Immigration under the Treasury Department to administer all immigration laws.
- further excluded the insane, those suffering from mental defects and other contagious diseases, felons, persons convicted of other crimes or misdemeanors, polygamists, in addition to other "undesirable" classes, and forbade the encouragement of immigration by means of advertisement.

Act of March 3, 1893

Added the following to the reporting requirements regarding aliens: occupation, marital status, ability to **read and write**, amount of money in possession, and facts regarding physical and mental health. This information was needed to determine admission to the United States according to the expanded list of exclusions.

Act of February 14, 1903

Transferred the Bureau of Immigration to the newly created Department of Commerce and Labor, and expanded the authority of the Commissioner-General of Immigration in the areas of rule making and enforcement.

Immigration Act of March 3, 1903

Amendment to the existing immigration law providing the exclusion of aliens on the grounds of proscribed opinions. Excludes "anarchist" or persons who believe in, or advocate, the overthrow by force or violence to the United State government or all other governments, or of all forms of law, or the assassination of public officials.

Naturalization Act of June 29, 1906

- Combines the immigration and naturalization functions of the federal government, changing the Bureau of Immigration to the Bureau of Immigration and Naturalization.
- **Provides that no person shall be naturalized who can not speak the English language except those persons who are physically unable to speak.**
- **Requires the applicant to sign the petition for naturalization in his/her own handwriting. Applicants must also demonstrate their attachment to the principles of the Constitution of the United States.**
- Requires at least two citizen witnesses to testify for the applicant.

Immigration Act of February 5, 1917

- Enlarges the inadmissible class and adds the first real deportation mechanisms.
- **Excludes all illiterate aliens from entry in the United States with a few exceptions. (Individuals must be literate in their native language, demonstrating their ability to read, write and speak).**

Act of May 22, 1918

Wartime naturalization legislation, authorized the President to control the departure and entry of immigrants in time of war or national emergency.

Quota Law of May 19, 1921

The first quantitative immigration law that limits the number of aliens of any nationality entering the United States to 3 percent of the number of inhabitants from that country in the U.S. according to the census of 1910.

Immigration Act of May 26, 1924

- The first permanent limitation on immigration, fixes the quota at 2 percent of the 1890 census.
- Authorizes examining aliens for admission before embarkation to the U.S.

Naturalization Act of 1938

Requires two citizen witnesses to testify their personal knowledge of an applicant's residence, character, attitude towards the United States Government, and his general qualifications for citizenship.

Alien Registration Act of June 28, 1940

Required registration of all aliens and fingerprinting for those over 14 years of age.

Nationality Act of October 14, 1940

- Codified and revised the naturalization, citizenship, and expatriation laws to strengthen national defense. The naturalization and nationality regulations were rewritten and the forms used in naturalization proceedings were revised.
- Minimum age required of a petitioner for naturalization is 18 years of age
- **Applicants for naturalization must be able to carry on an ordinary conversation in the English language. The law does not prescribe the required degree of fluency in speaking the English language.**
- Alien must reside continuously in the United States for 5 years and within the State where the petition is filed for at least 6 months.
- **All applicants must demonstrate a knowledge and understanding of the fundamentals of the history, and the principles and form of government, of the United States.**

Immigration and Nationality Act of June 27, 1952 (INA)

The multiple laws that governed immigration and naturalization in the United States were brought into one comprehensive statute. Immigration policies from earlier statutes were maintained along with significant alterations:

- made all races eligible for naturalization, thus eliminating the race barrier to immigration.
- eliminated discrimination between sexes with respect to immigration.
- revised the national origins quota system of the Immigration Act of 1924 by changing the national origins quota formula for a territory to one-sixth of one percent of the number of the foreign-born persons of that nationality who lived in the United States in 1920.

Also amended section 304 of the Nationality Act of 1940 requiring:

- **all applicants demonstrate a knowledge and understanding of the fundamentals of the history, and the principles and form of government, of the United States.**
- **all applicants to demonstrate the ability to read, write, speak and understand simple words and comprehend phrases that are used in the everyday English language, with the exception to those persons who are physically unable to comply or are 50 years of age and have been legally residing in the United State for 20 years.**

Act of December 24, 1952

Required applicants applying for Naturalization to **demonstrate their literacy abilities to the courts. These requirements consist of reading, writing and speaking the English language.**

Immigration and Nationality Act, Amendment of October 3, 1965

Abolished the national origins quota system dating back to the Immigration Act of 1924, eliminating national origin, race, or ancestry as a basis for immigration to the United States and replaced it with the preference system.

Freedom of Information Act of July 4, 1966

- Established that the record of every proceeding before the INS in an individual's case be made available to the alien or his attorney of record.
- Required that public reading rooms be established in each Central and District office of the INS, where copies of INS decisions could be made available to the public.

Immigration and Nationality Act of November 2, 1978

Replaced December 24, 1952 exemptions regarding the ability to read, write, speak English language with exemptions for those individuals over 50 years of age and residing in the United States for over 20 years.

Immigration Reform and Control Act (IRCA) of 1986

Contains two major provisions:

- a legalization program that allowed any illegal alien who lived continuously in the United States since before January 1, 1982 during the application period of May 1987 and May 1988 to be eligible for legal temporary residence if they had no serious police record, had passed a medical examination, and could prove financial responsibility.
- a requirement that all employers keep more complete and accurate records of their workers. For every new employee, the employer must secure official proof that the person is eligible to work in the United States.

Immigration Act of November 29, 1990

Revised naturalization authority and requirements:

- transferred the exclusive jurisdiction to naturalize aliens from the Federal and State courts to the Attorney General (INS)
- **added language permitting waivers of the English language requirement for those over 55 years of age who have been living in the U.S. for at least 15 years after admission for permanent residence.**

Illegal Immigration Reform and Immigration Responsibility Act of September 30, 1996

Place added restrictions on benefits to aliens.

- provided for verification of immigration status for purposes of Social Security and higher educational assistance.
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U.S. Department of Justice
Immigration & Naturalization Service
Office of Field Operations
Immigration Services Division – HQISD
POLICY & PROCEDURES

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FAX COVER

(for 26 pages including this cover sheet)

TO:

Irene Buend

FAX #:

456-5581

FROM:

Gerri Rattiff

DATE:

8/4/99

RE:

Summary Report

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a blueprint
for the **NEW**
Naturalization
process

Summary
Report

U.S. Department of Justice

Immigration and Naturalization Service

Coopers & Lybrand, L.L.P.



a blueprint
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America was founded on the promise of freedom and fresh starts. From its robust economy and open educational system, to opportunities for building a better life, America remains the land of opportunity. That's why it remains the destination for people from around the world who are yearning for a chance to make a difference . . . for themselves, for their families, and for America.



Citizenship — the Con

Citizenship is the cornerstone of full participation in our democracy. In taking the oath of citizenship, an individual accepts all the responsibilities of being a full member of our national community. In return, the new citizen is rewarded with all the rights and privileges of our democratic society.

Administering the laws granting U.S. citizenship through naturalization is one of the core functions and highest responsibilities of the Immigration and Naturalization Service (INS), a component agency of the Department of Justice (DOJ). Over the years, however, demand

exceeded the capability of the naturalization process. From 1994 to 1996, applications received for citizenship at the INS doubled.

This increase has resulted in a backlog of millions of applications, processing times of several years, and, to many observers, a perceived compromise of integrity.

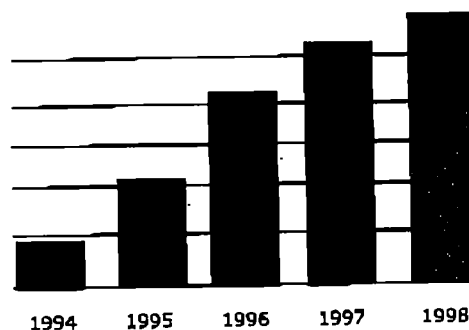
Naturalization applications continued to rise in 1997, and more than 1.5 million new applications are expected in 1998. The existing backlog is growing. The obvious remedy is that INS must dramatically increase its "productivity" — get more applications through the system more quickly while ensuring the fairness and integrity of the system. But how? Streamline the process? Add more staff? Use more computers? If "fixing" the system were simple, it would be fixed by now.

In March 1997, DOJ awarded a 2-year contract to Coopers & Lybrand L.L.P. (C&L) to reengineer the naturalization process. The statement of work conveyed the Attorney General's desire that this reengineering project "examine all aspects of the naturalization process, from initial contact by an applicant, through case adjudication and the swearing-in ceremony, to the retirement of the case record."

The reengineering effort looks to the future. While C&L has drawn on the lessons of INS's

previous experiences, the purpose of this project is not to judge past INS performance, but instead to develop a new naturalization process that will serve the INS as it moves into the next century.

APPLICATIONS RECEIVED



Based on an extensive data collection effort, including more than 1,000 interviews of DOJ and INS managers and staff, Congressional staff, community-based organization representatives, and applicants, C&L has proposed a complete redesign of the naturalization process along with a detailed implementation plan to make the redesigned process a reality. This summary report highlights C&L's approach, findings, proposed redesign, and implementation plan.

Commissioner Doris Meissner, when discussing the project, said "We believe that a reengineered naturalization program will enable the Service to meet its dual goals of safeguarding the integrity of the citizenship process while ensuring that our customers receive effective and timely considera-

Cornerstone of Democracy

tion of their applications." This report represents a significant step toward those goals.

The Proposed Process

The proposed process balances heightened integrity and improved customer service. Interviews with applicants and community-based organization representatives revealed that the primary issue was not the processing cycle-time itself, but rather not knowing what the cycle-time is. In this vein, the proposed

appointment with an adjudicator made

Furthermore, instructions specific to a particular applicant's situation are provided in advance, indicating the information and materials he or she should take to the interview.

Due to various disconnects within the present process and the lack of systems integration, INS information officers are often equally unprepared to handle many questions posed by applicants. At some offices, applicants wait for hours to get an update on their application

Naturalization

Naturalization is an important part of America's heritage ... and future.

process focuses on providing the applicant with as much information possible to ensure an equitable outcome within a well-defined series of steps. Integrity is assured through clearly understood requirements at each step.

Interested parties have expressed concerns over the lack of oversight of fingerprinting and testing performed by third-parties. The proposed process uses basic technological enhancements to significantly diminish the possibility of fraud, manipulation, or error. Technology is also used to track and confirm the identity of the applicant throughout the process.

Under current practices, applicants are often required to return to the INS District Office many times for follow-up interviews due to the applicant being ill-prepared. The proposed process greatly improves this situation by ensuring that the applicant has met the English and civics requirements before an

only to hear "wait another 120 days." The proposed process will allow an applicant to obtain status information on his or her application at any time.

The proposed process represents a substantial change in direction for many at INS, from Headquarters management to records clerks. Past reengineering efforts have taught us that even the best process has little chance for success if the implementation does not adequately manage this change. The proposed implementation plan addresses this concern by integrating aspects of communication, training, process redesign, procedure standardization, technology, and organizational impact into each functional implementation team.

What We Did

C&L used its BreakPoint BPRSM methodology in redesigning the naturalization process.

BreakPoint BPRSM is an integrated approach to reengineering which combines elements of process redesign, change management, and technology. Our effort consists of three phases:

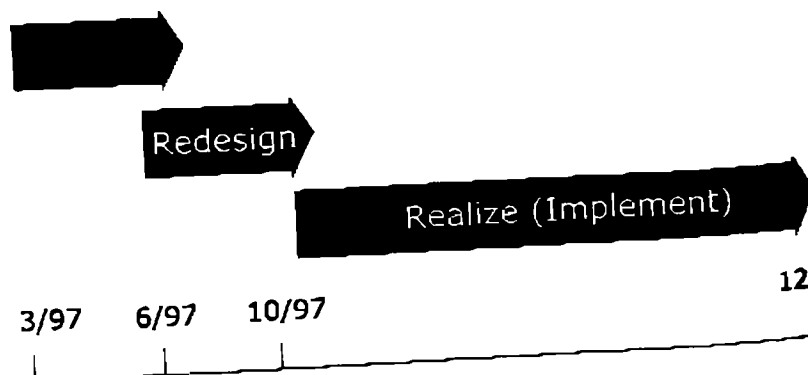
Phase 1: Discover began with the award of the contract and ended in late July. Phase 2: Redesign began in June (with some overlap of Phase 1 because of the aggressive timeframes of the project) and ended with the development of the proposed design. Phase 3: Realize, started in October with the establishment of detailed implementation plans.

Phase 1: Discover

During the first weeks of this project, the C&L team worked closely with the DOJ/INS core project team to collectively understand the overall approach, affirm timelines, and finalize standard operating procedures. Once our approach was established, we set out to collect data to understand the current naturalization process.

- **Document Review.** To learn the history and background of the naturalization program, and to identify the drivers behind the current process, we reviewed data from more than 300 documents, comprising over 5,000 pages of information.
- **Site Visits.** To understand the current naturalization process, current levels of performance, organizational culture and environment, and barriers to change, we visited INS sites across the country. During these visits, we talked to more than 500 INS managers, staff, and applicants.
- **Focus Groups with Key External Stakeholders.** To ascertain the various priorities and concerns of naturalization stakeholders, we talked to three major groups of external stakeholders: (1) community-based organizations; (2) Congress and (3) the Management Advisory Team (an advisory group to C&L of government and non-government stakeholders). Nearly 200 external stakeholders participated in these focus groups.

Three Phases of Reengineering the Naturalization Process



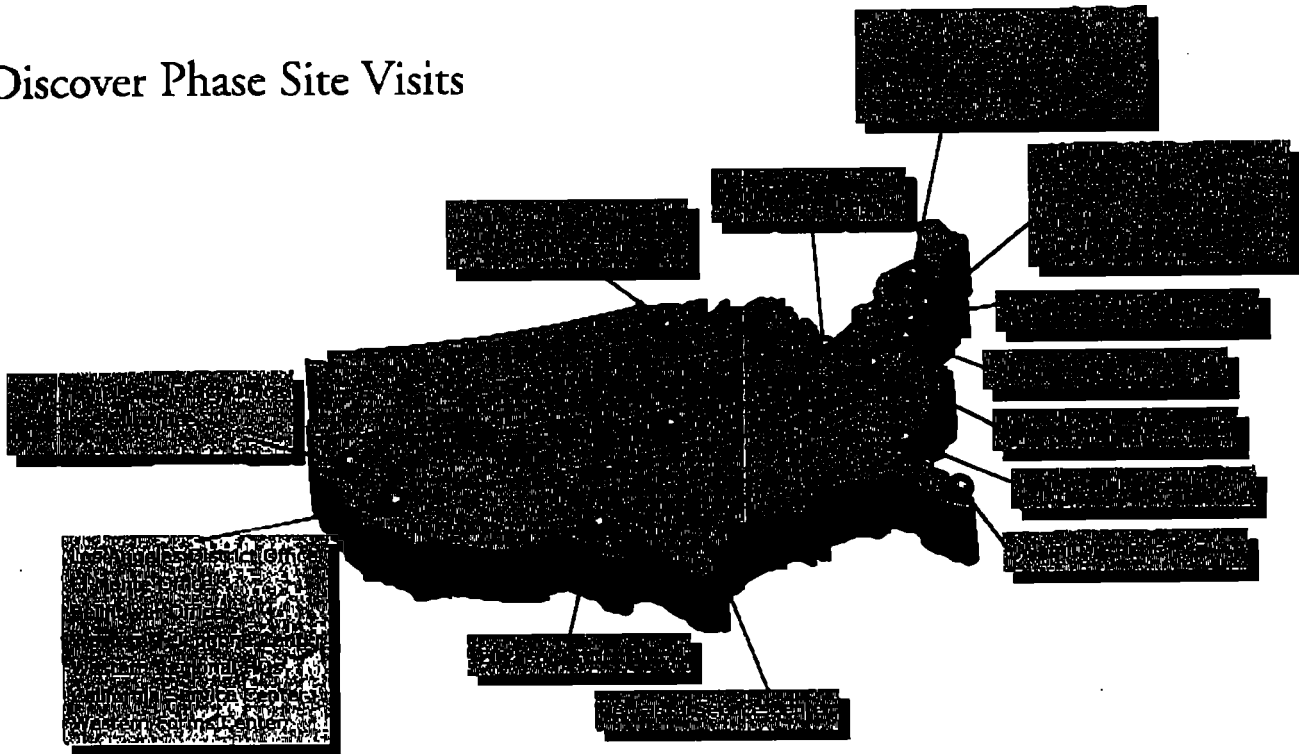
Phase 2: Redesign

In Phase 2: Redesign, we went through the conceptual exercise of taking the existing process apart, changing it, and then putting it back together. In addition to process changes, we began to consider how technology and change management (focusing on organizational impact, communication, and training) could be used to implement a new way of "doing business."

innovative thinking and ensure statutory requirements were met.

- **Benchmarking.** The best practices of comparable organizations were identified, studied, and, when applicable, integrated into the redesign.
- **Drafting and Refining the New Design.** The first draft of the new design was crafted during a series of brainstorming exercises, concept meetings, and working sessions. We took the draft to DOJ and INS

Discover Phase Site Visits



Key tasks included:

- **Defining the Parameters.** Working with senior DOJ and INS managers, we identified the priorities, vision, structure, and goals of the new process.
- **"Clean-Slate" Model.** To encourage independent, "outside the box" thinking, we put together a team of consultants to design a naturalization process which met the requirements of current statutes. The redesign team used this tool to stimulate

Headquarters personnel and to several field sites for their review, comment, and modification.

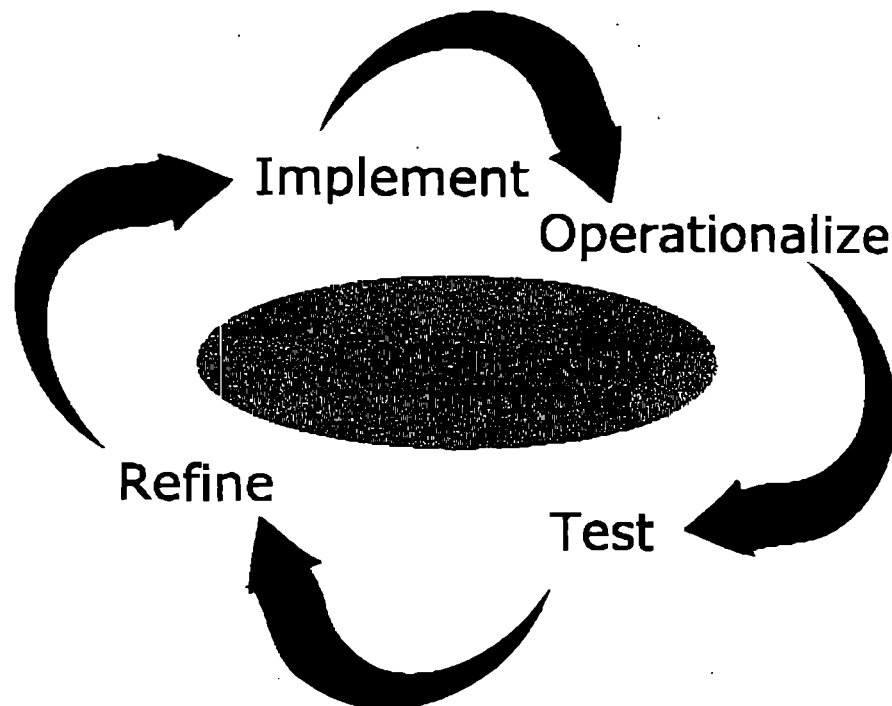
- **Simulation Modeling.** C&L used simulation modeling to validate the proposed naturalization process and to estimate staffing, implementation cost, and overall impact.

- **Developing a Change Management Structure.** Change management aligns an organization's people and culture with changes about to take place in business strategy, organizational structure, systems, or processes. With this in mind, we developed a change management strategy focused on the impact on employees, communication (including employee awareness of the change), and training for each phase of this effort.
- **Developing an Implementation Road Map.** The implementation plan was developed to serve as a basic road map that will guide INS in establishing the new process.

Phase 3: Realize

In the final phase of this effort, the concepts of the redesign are operationalized, tested, refined, and implemented. During this phase, quality control and performance measurement systems are also established to allow on-going monitoring of the new process and provide the data needed for implementing continuous improvements.

Phase 3: Realize: A Continuous Process



What We Found

Through our data collection efforts, we captured hundreds of findings and improvement ideas. Our findings are grouped into four broad categories: (1) the current process; (2) external stakeholder priorities; (3) INS culture and work environment; and (4) technology.

The Current Process

Process Integrity. In general, INS employees believe that upholding the integrity of the naturalization process is their most important function. We identified several areas, however, where improvements are possible.

- INS relies on outside contractors to provide all fingerprinting services and approximately 15 percent of its testing services. Despite safeguards, INS cannot verify that third-party identity checks are performed accurately.

Consequently, an applicant might pass or fail the tests depending simply on which adjudicator conducts the testing.

- Information on aliens is sometimes incomplete at the time of adjudication. In theory, the applicant's A-file is the accurate, comprehensive record on an alien. However, if temporary or working files are not consolidated with the A-file prior to adjudication, an applicant, who might otherwise be ineligible for citizenship based on documents in missing files, may become a citizen.
- Adjudicators lack adequate guidelines for deciding complicated cases, creating a situation where the same case could be approved by one adjudicator and denied by another.

Process Integrity

Assure fairness every step of the way for qualified applicants.

- Applicants currently retain custody of fingerprint cards, making it possible for someone to change or alter this critical document.
- Agreements with external vendors include few incentives for improved performance or penalties for poor performance.
- Objective English and civics proficiency standards have not been set by INS. Lacking national standards, districts have developed their own methods for assessing English and civics proficiency.

Eligibility Screening. Prior to the interview, most INS offices conduct little or no eligibility screening. Under the current system, individuals who clearly are not eligible for citizenship (e.g., do not meet residence requirements) may make it all the way to the interview prior to being eliminated from the process.

Applicant Preparation and Customer Service. We often found the level of applicant preparation to be poor. Applicants often did not know what to expect when applying for naturalization. One indicator of this lack of preparation is the number of cases continued because not all of the necessary documents had been submitted. Approximately 37 percent of cases were continued in FY 1996 because of missing documents. In addition, a notable number of applications were rejected by INS or had to be corrected before being processed. Incorrect or incomplete application submissions can be attributed, in part, to the citizenship application and corresponding instructions: neither are user-friendly and both are out of date.

- Treating applicants fairly and consistently. Testing, interviewing, and processing should be done the same way everywhere.
- Having courteous, respectful, and professional staff.
- Providing forms that are current, easy to get, easy to read, and easy to complete.
- Giving applicants a thorough understanding of what is involved in the naturalization process: how long it takes, what documents are required, and what are the steps in the process.

Customer Service

Treating applicants fairly, courteously, and consistently.

Non-Value Added Work. We observed several instances in the current process where INS duplicated work. For example, in the current process, INS collects and enters data it already has; multiple application "processing sheets" are used at several districts; A-file retrieval, mail sorting, and inter-filing are labor-intensive and time-consuming; and certificate production involves reentry of data, "cutting and pasting" of photographs, and, in a notable number of cases, rework.

External Stakeholder Priorities

Stakeholder priorities include:

- Making the "right" naturalization decision in a predictable timeframe. Most stakeholders were less focused on how long they had to wait and more concerned about knowing what to expect. Generally, 6 to 12 months was viewed as reasonable.

INS Culture and Work Environment

A large scale change effort, such as implementing the redesigned naturalization process, must address an organization's culture and environment. Our efforts yielded the following findings with regard to INS culture and work environment:

- INS employees have a relatively clear sense of the INS mission. However, they are uncertain of the organization's strategy for achieving the mission, and of their role within this larger context. Pressures from the external environment strongly influence organizational priorities and, in turn, the strategies employees follow.
- Given the great influence of external forces, the INS culture, with regard to the naturalization program, is risk-averse. For example, several adjudicators stated that some complex cases are continued in lieu

of making a final decision to avoid being criticized for making the wrong decision.

- Many managers feel "stuck in the middle," lacking the appropriate tools and support from Headquarters to react to the problems facing the naturalization program. They feel unduly criticized about circumstances they cannot control and frustrated with what they perceive to be reactive and uninformed responses from Headquarters.
- In general, there is a lack of standard procedural guidelines. As a result of decentralization, many locations independently interpret existing guidelines or develop new guidelines of their own.
- Most naturalization employees reported receiving little formal training. The majority of employees did receive informal on-the-job training. No formal version of on-the-job training exists, resulting in a "learn as you go" system.
- In general, we found employees to be extremely dedicated to their work. Most reported they felt they were contributing to an extremely valuable cause. This suggests the workforce is driven by the mission of the organization. However, employees reported that large backlogs, lack of positive reinforcement, and inability to provide customer assistance occasionally reduces their motivation.
- INS's current systems architecture is comprised of individual stand-alone databases. There is no true central database, nor are there linkages among individual databases.
- Computers are not being effectively used. For example, many locations have either too few or no PCs.
- A business application should complement and enable the business process it supports. Naturalization software not only fails to fully support its business processes, but in many cases hinders it. In some cases, applications are not fully implemented. In others, applications are modified in attempts to support changed business processes, but fall short of the required goal. Lack of full functionality, in turn, creates the need for "work-arounds," which inevitably result in a more labor-intensive and a less efficient process.
- INS has undertaken several initiatives which could significantly improve its technical stature. Unfortunately, the time it takes to implement these projects has superseded the technical life of much of the technology being deployed. To be effective, technology initiatives must be strategically defined, then quickly deployed.

Standardization

Standardization is limited...each site interprets guidelines or develops its own.

Technology

With an eye toward implementation, we sought to understand how technology currently supports or hinders the current process. The following highlight what we found with regard to technology at INS:

- In many instances, technology initiatives are not "owned" by knowledgeable end-users. Rather, they are driven by technical staff. The results are technically sound solutions which do not reflect INS's business requirements.

Vision for the

The framework of the new naturalization process is Title III of the Immigration and Nationality Act, of U.S.C. §1401 et seq. Although the law may change in the future, any process created today must meet the requirements of the existing statute. With the statute as a backdrop, we identified a set of outcome goals, or intended results, to gauge how well the new process is working. We also developed a set of "cornerstone" principles that will enable INS to achieve these goals. These goals and cornerstone principles serve as a powerful tool for focusing the redesign effort.

Goal 1: Make the Right Decisions

Simply put, the right decision means that individuals who are eligible and qualified to become naturalized citizens are granted citizenship, and those who are not are denied citizenship. The most direct measures of this goal are: the number of approved cases that should not have been granted and the number of denied cases that should have been granted.

New Process

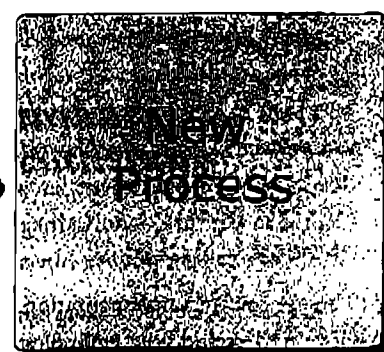
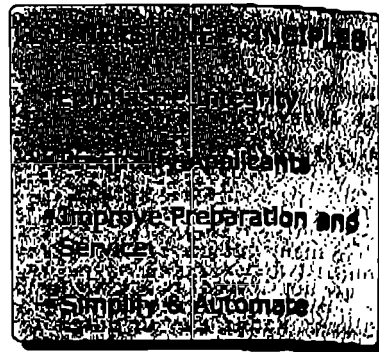
Goal 2: Make Decisions in Reasonable Timeframes

INS stakeholders consistently report that timeliness is a high priority. It is up to INS, working within the confines of the naturalization process and current backlogs, to determine what is a "reasonable" timeframe. However, as the new process is implemented and backlogs diminish, the target timeframe should get shorter. We recommend progress towards this goal be tracked using the average time an applicant must wait from the date the application was received at INS to the date the oath was taken or a denial letter was sent.

Goal 3: Conduct the Process Consistently

This goal establishes that similar cases will be treated in a similar fashion regardless of where they are processed. Consistency applies to both the time involved in processing the case and the final decision made. Ultimately, we recommend achievement of this goal be gauged through such measures as average site cycle time and comparisons of district denial rates for like applicant populations.

Outcome Goals and Cornerstone Principles



ESS

Goal 4: Design a Cost-Effective Process

Once other requirements (e.g., process integrity, reasonable timeframes) have been addressed, the naturalization process should be designed and managed to make optimal use of resources. While it is extremely difficult to measure whether or not resources are being used optimally, it is possible to track overall unit costs and analyze trends over time. It is also possible to track "touch time" to determine and assess how much effort is being expended to process an application. Therefore, we recommend INS use the following measures as indicators of cost-effectiveness: average total cost to process a naturalization case (from receipt of application to oath); and average total "touch time" to process a naturalization case (from receipt to oath).

Goal 5: Improve Customer Satisfaction

In keeping with guidance from the Attorney General and the INS Commissioner, as well as adhering to sound management principles, INS needs to place a priority on applicant satisfaction with the naturalization process (not necessarily the result). In order to gauge customer satisfaction, we recommend INS continue its work developing and administering an applicant survey to assess customer satisfaction.

Naturalization Process Cornerstone Principles

With the above goals in mind, we developed the four cornerstone principles upon which to construct a new process.

- **Cornerstone 1: Emphasize Integrity.** The new design places a premium on integrity. Strengthening the overall process will contribute greatly to the ultimate goal of making the right decision.
- **Cornerstone 2: Prequalify Applicants.** The new design ensures that "ineligible" applicants do not enter the process. Removing ineligible or unqualified applicants from the naturalization pipeline at an early stage will allow limited INS resources to be applied to legitimate cases and will speed up the process.
- **Cornerstone 3: Improve Applicant Preparation and Service.** Better communication with applicants at the very beginning of the process means happier applicants, fewer counter visits, fewer forms rejected for errors or lack of information, and fewer instances where adjudicators are unable to grant or deny citizenship because of missing documentation.
- **Cornerstone 4: Simplify the Process and then Automate.** The new design takes advantage of technologies that will improve the accessibility and integrity of applicant data, eliminate redundancies, minimize manual labor, and in general, reduce the amount of time and effort required to process a case.

Our Blueprint

The redesigned process starts with accurate, easy to understand information. Becoming a citizen is complex. For the process to function effectively, prospective applicants must clearly understand what is required, what to expect, and how to proceed. The naturalization information packet gives that to applicants.

Information Packet

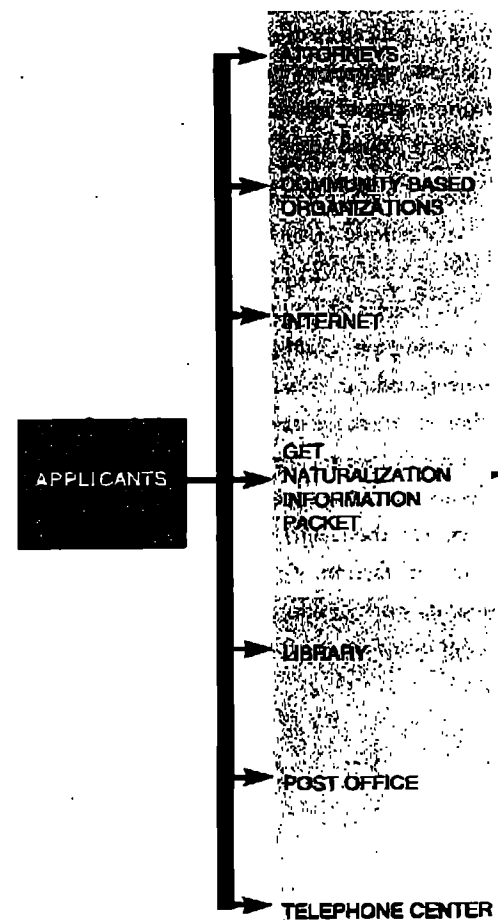
Since naturalization is complex, the packet should be produced in multiple languages to ensure that prospective applicants understand the process. Getting broad coverage in multiple languages is not an enormous task. A packet in five languages: Spanish, English, Vietnamese, Filipino, and Chinese, would have covered nearly 75 percent of those naturalized in FY 1996. Translating the materials into nine more languages would have covered another 15 percent of those who naturalized in FY 1996.

To understand the process, prospective applicants must have ready access to information packets. We propose that this information be available through many sources, including attorneys, community-based organizations, district offices, form centers, libraries, and the Internet.

To facilitate self-screening, the packet will include an eligibility worksheet. This worksheet guides the applicant through a series of questions to help determine his or her naturalization eligibility. For those not yet eligible, the worksheet will provide guidance on when they will become eligible. For those who are eligible, the worksheet will provide informa-

tion on the next steps in the process. Those not eligible for naturalization will have the information necessary to avoid wasting time and money applying for a benefit that will be denied.

While a well designed information packet can provide many prospective naturalization applicants with the data needed to decide to apply, some people will continue to need individual assistance. As many as 30 percent of applicants are currently assisted by attorneys or community-based organizations. The information



packet will recognize this valuable resource. We anticipate that many applicants will continue the process with either an attorney or a community-based organization. Others will need additional assistance from INS.

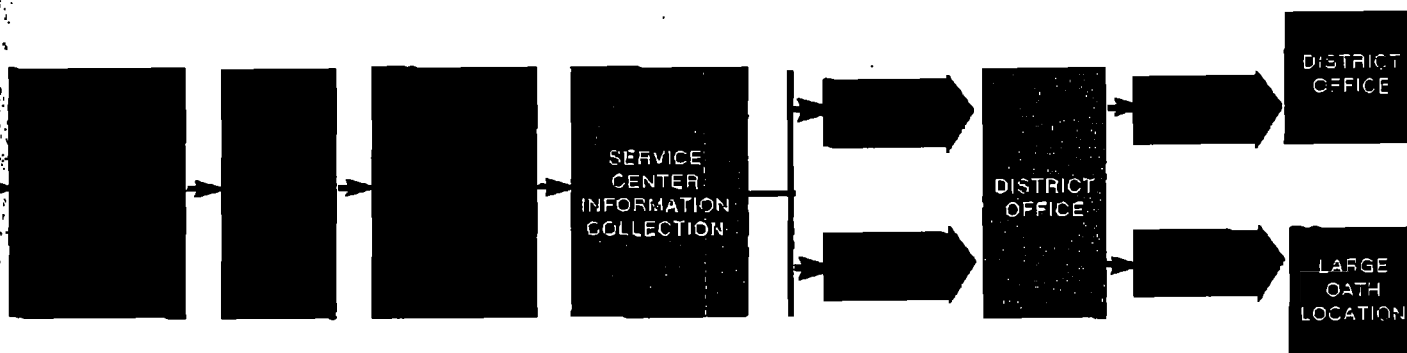
Telephone Center

Today, individual assistance for naturalization and other benefits can be obtained from immigration information officers at district and suboffices. The wait for individual assistance, however, can be substantial. To improve access to information, we propose that a naturalization telephone center be established. The telephone center would be staffed with people specially trained on naturalization and designed to provide accurate, understandable

information in minutes. While district offices can still provide individualized information under the new process, the telephone center will provide it from the convenience of one's home.

The telephone center will also support two other aspects of the new process, creation of an electronic file and distribution of test authorization forms. Those who elect to apply for naturalization can start the process with a call to the telephone center. At this point, an electronic applicant file will be created. This file will initially be populated with existing INS data.

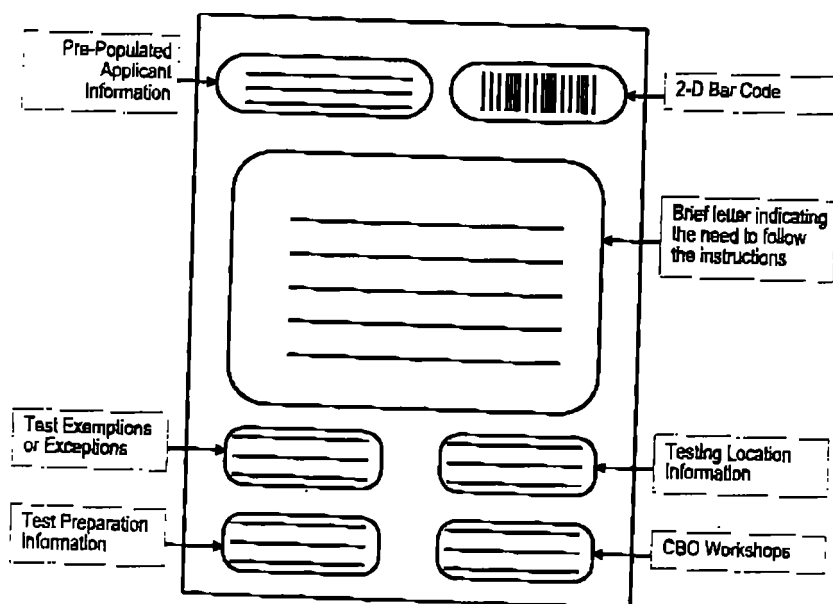
Telephone center personnel, working with the prospective applicant, will update the electron-



The Redesigned Naturalization Process Flow

ic file. For example, since many prospective applicants have not had contact with the INS for many years and may have moved, the telephone center will be responsible for updating the applicant's address. If corrections are needed, the caller will be provided with detailed instructions on what is required to correct his or her file.

Test Authorization Form



Once the electronic file has been created, a test authorization form, along with the requirements for the English and civics examinations, study guides, testing sites in the prospective applicant's area, and the process for test registration, will be sent to the prospective applicant. Based on information in the electronic file, coupled with questions posed during the telephone center call, test authorization forms will also include any testing exemptions or exceptions (such as exemptions due to age or disability).

Developing an electronic file for prospective applicants at this point in the process will allow INS to dramatically improve its ability to forecast naturalization receipts. Over time, INS will be able to determine the normal time it takes from the request of a test authoriza-

tion form, to the receipt of passing test scores, to the filing of an application, and the portion of prospective applicants that drop out prior to applying. This will improve INS's ability to forecast receipts, to predict changes in naturalization application patterns, and to adjust its resources accordingly.

Test

At the convenience of the prospective applicant, a testing date is scheduled. The prospective applicant will proceed to the local testing site and provide testing center personnel with the test authorization form. The test authorization form includes key biographical data on the prospective applicant along with a bar code. This information is "wanded" into the testing center computer. To verify identity, testing center personnel review two forms of identification, including the alien registration card, and take a two-digit fingerprint. A test, including both the English and civics requirements, is then administered at the site.

Testing center personnel will score the test. If a prospective applicant passes the test, the passing score, biographical data, and fingerprints will be electronically submitted to INS and attached to the prospective applicant's electronic file. If a prospective applicant is unsuccessful, the testing center will communicate this information to the applicant, not to the INS, along with educational information on the areas that need additional study to be successful on the next attempt.

To enhance the integrity of the process, two-digit fingerprints are used to ensure that the person tested is the same person who is later fingerprinted for the FBI check, interviewed, and if granted, given the oath of citizenship. Electronic submission of passing test scores also enhances the integrity of the process.

Pre-populated Application

When the INS receives a passing test score and two-digit fingerprint, the prospective applicant's electronic file is updated and a naturalization application (pre-populated with data INS has on the prospective applicant and bar coded) is produced and sent to the prospective applicant. Included in the package will be customized instructions based on the category of eligibility the applicant is applying under.

Customization is intended to make applying for citizenship easier and improve the quality of the applications received. When we interviewed applicants, many stated that the existing instructions, which include all eligibility categories, are very confusing. For example, many did not understand where they would get their military records since they had not served in the military.

Pre-populated, bar coded naturalization applications are intended to minimize the data applicants will need to provide and reduce the data entry required by INS. Customized instructions are intended to improve the quality of the applications received.

Once a pre-populated application is produced, the naturalization system will automatically initiate an agency-wide search for the alien file. This search will query each file control unit and Federal Records Center to find the alien file, along with temporary files, working files, and other material associated with the alien. This agency-wide search will ensure that all information known by INS on the applicant will be available as part of the adjudication process. We are recommending initiating the file search at this point, prior to actual receipt of the application, to ensure that sufficient time is available to obtain and consolidate files without delaying the ultimate adjudication.

Fingerprinting

With the pre-populated application, prospective applicants will receive a notice telling them to go to the fingerprint site in their area to be fingerprinted, photographed, and to pay the application fee. Fingerprints and photographs will be taken digitally. Fingerprint equipment will include quality control reviews to ensure that prints are readable, thereby reducing the number of fingerprints rejected by the FBI. In FY 1996, nearly 200,000 fingerprint cards were rejected, leading to substantial processing delays.

Fees will be taken in person to ensure the accuracy of the amount. Currently, many applications are rejected because an incorrect fee is submitted. By taking the fee in person, we can eliminate this type of rejection. Digital fingerprints, the digital photograph, and proof of fee payment will be attached to the applicant's electronic file. Digital fingerprints will be batched and transmitted electronically to the FBI.

Digital fingerprint capture and transmission to the FBI can ultimately mean that responses from the FBI can be obtained in days, not weeks or months as is currently the case. Fingerprints will be electronically tracked, with the FBI response electronically submitted to INS and automatically attached to the electronic applicant file. An electronic copy of each applicant's fingerprints can also be easily stored throughout the process in case an update of the FBI results is required.

Send Application

Once fingerprints and photographs are taken and the fee is paid, the applicant will be instructed to complete the application, provide all required supporting documentation, and submit the package for processing at the INS Service Center.

Service Center Review

Upon receipt at the Service Center, an application will undergo a series of quality control checks to detect key errors that would impede processing. Any errors or omissions are clearly documented and a notice to the applicant is generated describing all deficiencies and providing clear, understandable instructions on how to remedy these errors. Applications that pass the quality checks are put into the electronic file using the bar code, with data entry clerks keying in any data corrections and new information. The application and all supporting documentation are then imaged and attached to the electronic file.

A receipt will be sent to the applicant with a description of the balance of the process, expected timeframes, and an 800 number where application status can be verified 24 hours a day, 7 days a week.

Input of the application into the naturalization system will automatically trigger a series of independent, third-party verification requests. For example, Selective Service numbers and key identifying information can be transmitted to Selective Service to verify accuracy. Independently verifying key data elements will allow adjudicators to focus their reviews on questions that cannot be easily verified and on differences found in the independent checks.

The Service Center will also be responsible for the receipt and consolidation of all alien files, including temporary and working files. The completion of file consolidation will be noted

by the Service Center in the electronic applicant file. Once the FBI background check, independent third-party verification, complete alien file, and receipt of any additional documents requested by the Service Center are all noted in the electronic record, the application will be ready for Service Center adjudication.

The Service Center adjudication is a review of the paper and electronic file for two purposes:

1) to determine if all supporting documentation needed for a complete adjudication is contained in the paper and electronic files, and 2) to classify the case as a routine or complex one. In FY 1996, more than 300,000 cases were continued because additional supporting documentation was needed. Most of these cases required a second interview to adjudicate the claim. A complete file will reduce the continuation rate and allow more claims to be adjudicated with the same number of interviews. Service Center adjudicators will review the completeness of the file and request any additional information that is needed.

Service Center adjudicators will also classify cases. Classifying cases as routine or complex will allow districts to schedule sufficient time to adjudicate complex cases while expeditiously adjudicating the routine ones. Understanding the complexity of claims upfront will also allow districts to match cases to adjudicators with the appropriate skill levels to handle the work.

The district will identify the number of interview slots that are available and input them into the scheduling system, which will automatically schedule the interviews and generate notices. Service Centers will ship the files to the district prior to the scheduled interview to minimize the space required for file storage at the districts.

Interview

When applicants appear for the interview, a two-digit fingerprint will be captured. The fingerprints will be uploaded into the naturalization systems and in a matter of seconds, the applicant's electronic file, including the digital photograph, will appear on the screen. Using the digital photograph and other identity papers, the district will be able to ensure that the person at the interview is the same person who took the test and was fingerprinted.

The adjudicator will conduct the interview, documenting all required responses electronically in the naturalization system. Various edit checks will be built into the system to ensure that the interview is documented completely.

The applicant's oath selection will be input into the system. A notice for both types of ceremonies will be generated with instructions on what the applicant must do to complete the citizenship process. An example of the naturalization certificate, with all required information and the digital photograph, will appear on the screen for review by the applicant. Any errors in the certificate will be corrected by the adjudicator. This should dramatically reduce the number of certificates that has to be reproduced to correct errors. An estimated 300,000 to 500,000 certificates were produced to correct errors in the original certificate in FY 1996. Using the digital photograph will also eliminate the need to manually paste photographs on certificates.

Oath Ceremony

The importance of citizenship publicly proclaimed.

For example, if the adjudicator attempts to enter a grant into the system without documenting the response to all required questions, the system will automatically prompt the adjudicator for the missing responses. Once the documentation is complete, a grant or deny decision can be input into the system.

Oath Ceremony

Where court restrictions do not prohibit it, we recommend that both same day oath and later oath ceremonies be offered to those being granted citizenship. Same day oath ceremonies allow applicants to quickly obtain their benefit in a dignified way. Large group ceremonies, scheduled after the interview, allow the importance of citizenship to be more publicly proclaimed. We believe both formats are important.

At the ceremony, applicants will check-in using the two-digit fingerprint. His or her electronic file will appear on the screen, identity will be verified, the alien registration card surrendered, update questions asked, and the answers entered into the file. The applicant will proceed to the ceremony. At the conclusion of the ceremony, the new citizen will check out of the system with a two-digit fingerprint and pick up his or her naturalization certificate. This check out procedure will ensure that the same person completed all steps of the process, from testing, to fingerprinting, to interview, to ceremony, to oath. The system will also automatically close-out the case in the system and direct that the alien file be sent to the Federal Records Center.

Incorporating the Cornerstone Principles

Key features of the new process as they relate to each cornerstone are described below.

Emphasize Integrity

This cornerstone principle is grounded on two basic premises: first, the process must ensure that the individual whose citizenship is being considered is the same as the one who applied, was tested, fingerprinted, photographed, interviewed, and sworn in (i.e., there is a continuous positive identification); second, the adjudicator will base the decision on the thorough review of a complete case file.

With regard to emphasizing integrity, the process includes the following features:

- two-print identification check at all steps of the process
- digital fingerprints to improve quality and reduce the number of fingerprint card rejections
- digital photograph capture, comparison, and inclusion on naturalization certificate
- agency-wide search for all applicant-related files
- independent verification of information
- comprehensive Service Center adjudication

Prequalify Applicants

The redesigned process must ensure that only those applicants who are qualified for naturalization enter the process. The new process includes mechanisms that will prevent ineligible or unqualified applicants, as well as applicants having incomplete documentation, from entering the system. These mechanisms include:

- eligibility worksheets to allow applicants to self-screen
- Telephone Center eligibility checks

- English and civics testing early in the process
- quality checks for completeness

Improve Applicant Preparation and Service

Well-informed applicants require fewer counter visits, produce better applications, and move through the process more smoothly. In addition to increasing applicant preparation, the new process will improve customer service. The following features of the redesigned process will improve INS service to the customer and produce an applicant who is better prepared:

- easy-to-access information and instructions in different languages
- pre-populated forms and customized instructions with evidence requirements
- one-stop convenience for fingerprints, photograph, and fee
- easily accessible status information
- same day oath option (where available)

Simplify the Process and then Automate

Simplifying the process by eliminating unnecessary work and taking advantage of technology minimizes the "manual" workload and increases the speed with which work is accomplished. The following list of design features and technologies will streamline the process and reduce overall cycle times:

- passive information distribution (i.e., no effort required on the part of INS staff)
- bar code technology
- electronic applicant files
- digital fingerprinting and photograph identification
- automated production of certificates

Moving Forward

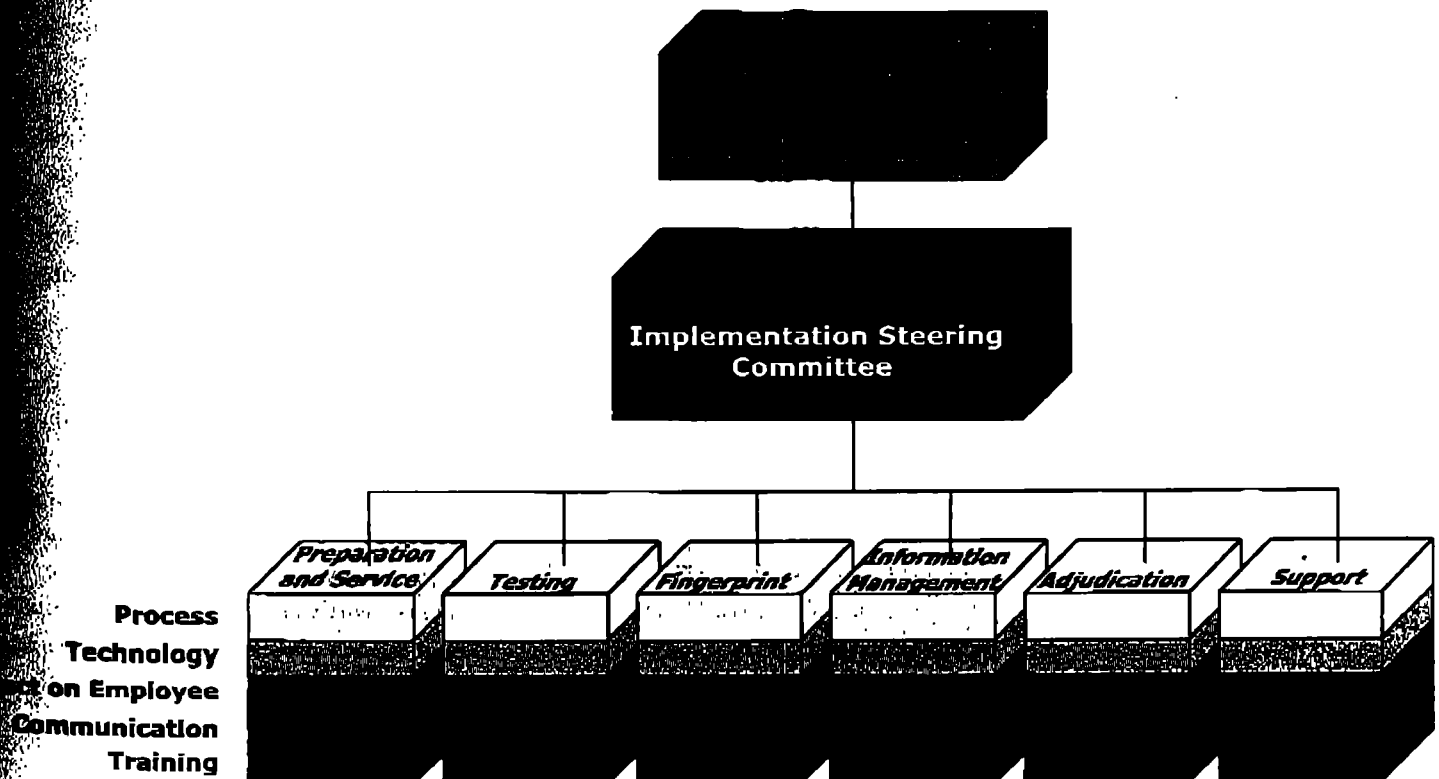
Success of the redesign can only be realized if the process is successfully implemented and sustained. Developing a new process on paper is only the first part—making it work in practice is the real challenge. Successful implementation depends on many changes occurring in units. The new process must be married with existing people, facilities, infrastructure, and technology. Integration of this nature requires careful planning and aggressive management. INS has developed a program management structure for implementing the new natural-

ization process that not only partners with INS during implementation, but provides for the transfer of knowledge to INS to ensure that the new process is sustained after the contract has ended.

Overall Project Management Structure

Based on our experience with large-scale reengineering implementation, we find that organizations are more successful when the implementation effort is divided into smaller,

Project Management Structure



more manageable projects. This effort is managed jointly by DOJ and INS. Actual implementation is divided into six project teams: (1) Preparation and Service Team; (2) Testing Team; (3) Fingerprint Team; (4) Information Management Team; (5) Adjudication and Ceremony Team; and (6) Implementation Support Team.

The first five teams focus on the major portions of the new design. These teams will be responsible for planning, managing, and implementing all aspects of the new design related to their functional area. The Implementation Support team is responsible for preparing sites for the new design. This includes reducing existing backlogs, facilitating parallel processing of the existing and redesigned workflow, managing the transition, and developing systemwide training.

- handling more technologically driven procedures; and
- working with a more standardized naturalization process.

As the INS pushes in this new direction, parts of the organization may be inclined to push back. This resistance can be the most critical barrier to change.

To successfully implement the new naturalization process, each implementation team is responsible for five streams of activity: 1) process, 2) technology, 3) impact on employees, 4) communication, and 5) training.

The Implementation Steering Committee, along with the Program Management team, is responsible for coordinating individual team efforts to realize synergies across these teams.

Teamwork

Dedicated professionals working together toward a common goal.

Each team is led by a C&L employee responsible for meeting the goals of the implementation plan and coordinating the overall activities of the team. These leaders are members of the Implementation Steering Committee. The Implementation Steering Committee will report directly to the Program Management team, a small group consisting of the engagement partner and project director, responsible to the Joint Management Team.

Managing the Change

The INS organization and its employees will face significant change as the new naturalization process is implemented, including:

- adapting to new roles with greater responsibility and accountability;

Implementation Teams

The Implementation Teams are responsible for making the redesign concepts a reality. Redesigned concepts are first converted into clear, understandable operational plans. Each step of the plan is tested to ensure that the overall plan delivers the intended results. Plans are refined based on the testing and rolled out across the INS. Incorporated into the plans are quality control steps and performance measurement systems to allow on-going monitoring of the new process and to provide the data needs to continuously improve the process. The work of each team is highlighted below.

Preparation and Service Team

The Preparation and Service team will be responsible for managing the development of the customer interface tools for the new natu-

tion process. This comprehensive effort includes all written and face-to-face communication with prospective applicants, community-based organizations, attorneys, and other stakeholders. Key customer interface tools include:

Naturalization Information Packet. A comprehensive brochure that explains eligibility and qualification requirements of naturalization, how the process works, and what the applicant should expect. The brochure will be produced in multiple languages, be readily available, and include an eligibility worksheet to allow prospective applicants to easily determine their own eligibility.

Telephone Center. Customers will be able to get both general and case-specific information on naturalization and start the naturalization process, all through the convenience of one's home. Specific goals include reducing visits to district office information counters, improving accessibility to information, and improving the quality and consistency of naturalization information.

Testing Team

The testing team will be responsible for managing the development of a standard testing program for English and civics. Specifically, the team will be responsible for overseeing the program associated with the following:

Testing objectives—the high-level goals of English and civics testing. The team will confirm the high level objectives of the testing program.

English proficiency levels (sometimes called standards). Once testing objectives have been confirmed, the team will work with an advisory group of experts to establish proficiency levels for English.

Standards could be expressed in terms of existing standards (e.g., 3rd grade reading level) or they could be defined more

explicitly (e.g., "able to read simple sentences comprised of no more than single-syllable words").

- **Body of facts that will be used to test whether applicants have the required civics "knowledge and understanding."** The team will work with an advisory group to define the body of civics data that applicants need to know. Ultimately, this body of knowledge will be converted to a pool of standard questions that will be used to create civics tests.
- **Test formats and instruments.** The format for both the English and civics tests will be determined based on a number of factors, including standard testing practices, economic factors, and content. Once a format has been determined, the team will oversee the work of a test development contractor, as they develop test instruments and protocols.
- **A nationwide testing network for administering tests.** Tests can be administered by INS staff, a single national vendor, or several vendors. At this stage, we envision the use of a single reputable vendor. However, we recommend a final determination be made by the Testing team and Advisory Group.

Fingerprint Team

The Fingerprint team will be responsible for consolidating fingerprinting at INS, ten-print fingerprinting, two-print fingerprinting, digital photographs, fee receipting, and electronic fingerprint transmission.

- **Consolidate Fingerprinting at INS.** Congress has mandated that INS take all naturalization fingerprints in FY1998. Given the urgency of this mandate, our Fingerprint team will work in conjunction with the Executive Office of Naturalization Operations to bring the fingerprinting function back into INS by March 31, 1998.

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- **Digital Ten-Print Fingerprinting.** The new fingerprint process will capture ten-print fingerprints digitally, review the quality of the prints, and transmit the image to the FBI.
- **Digital Two-Print Fingerprinting.** The new fingerprint process will also capture two-print fingerprints at the testing site, at the interview, and at the oath ceremony to verify the applicant's identity throughout the process.
- **Digital Photographs.** These photographs will be used to verify an applicant's identity at the interview and the oath ceremony, and to produce the naturalization certificate.
- **Fee Receipting.** The application fee, including the fee for fingerprints and photograph, will be collected and electronically submitted to the Treasury.

Information Management Team

The Information Management team is responsible for managing the design and development of the business process and technical support systems needed to process naturalization applications. These activities include the receipt and review of the application, capture of the information into the Central Data Repository, and gathering of information for external resources. Key tasks include:

- **Information management workflow.** This includes the development of models for each naturalization office configuration (small, medium, and large) and each Service Center.
- **Central Data Repository.** The team will design and roll-out this data storage system. Central Data Repository functions will enhance all aspects of the new process, as every INS employee and contractor involved in the process will have access to

the same data. This will improve data integrity and minimize the amount of data entry required to populate naturalization systems.

- **Application review process.** The team will define the specific Service Center workflow, review criteria, return process, and re-review process.
- **Data entry module.** This information system would enable the data entry personnel to add information into the CLAIMS 5.0 system and would include bar code, scanning, and imaging technologies. The information would be a modified version of the existing CLAIMS 4.0 system and would include all workflow, process, and technology enhancements required to efficiently capture required information.
- **External entity data-gathering module.** This search engine would pull basic "key" information from the electronic applicant file and forward this information electronically to external entities. These entities would, in turn, search their information systems for specific data and, if found, return that data to the INS.
- **A-file search process and technology.** This process would trigger the request for a nationwide file search, finding all instances where the A-file or any version of the working or temporary files are located. This ensures a more complete consolidation of the alien's information.

Adjudication and Ceremony Team

The Adjudication and Ceremony team will be responsible for managing the development of the new adjudication process, implementing the new process, and training the impacted employees so they will succeed in the new environment. The specific areas include:

File review process. The Service Center adjudicator will review the complete application, the A-file, and all other information gathered in order to (1) determine what additional documents the applicant will need at his or her interview and (2) to make a determination on the level of the interview (regular or expanded) required for each applicant.

Regular and expanded interview. This effort includes designing criteria to categorize cases as routine or complex. Complex cases will be given an expanded interview with the time needed to cover the difficulty of the case. Routine cases will be given regular interviews which will be shorter in duration.

Information support modules for the file review and interview processes. These modules will assist the review and adjudication processes through decision logic.

Implementation Support Team

The Implementation Support team is responsible for all activities which support the transition of the new process to the field. At this point, the team will be responsible for working with the field to reduce the backlog, facilitate the parallel processing of the redesigned and existing workflow, manage the transition process, and develop all relevant training. Specific areas of concern include:

- **Current workload and backlog assessment at the implementation site.** Define the effort necessary to complete the entire workload, establish a central location (model office environment) for assisting in clearing the workload, and add the needed resources to reduce the backlog.
- **Model office analysis and configuration.** This effort will work in conjunction with the other five teams to prepare the model office site for the deployment of new

Responsible

Together creating a better solution.

Scheduling module. Scheduling functionality will be built into the review and adjudication support modules, to automate the scheduling functions for the regular and expanded interviews and the oath ceremonies.

Digital certificate production. This application will produce a digital naturalization certificate.

Close-out process. This includes all automated support vehicles required to close and retire the file.

processes and equipment. Model office environments will act as both a "controlled" field production environment and a backlog reduction facility.

- **Dual Processing.** This effort helps manage the transition from a manual to technologically-driven process by operating both processes simultaneously until the technology is fully tested and high confidence is reached.
- **Transition management.** One of the critical issues for the Implementation Support team to address will be how to prepare the organization for the change.

Next Steps

Integrity, customer service, standardization, and automation are the essential ingredients of implementing the new redesign. Some of the features of the new design can be realized very quickly, while others, especially the automation, will require significant development and testing before their full benefits are realized.

Based on our implementation plans, integrity will be significantly strengthened in FY 1998 as INS takes over all fingerprint responsibilities and rolls out the digital capture and transmission of fingerprints. The clerical functions of application processing will be consolidated into the Service Centers in FY 1998. District Office adjudication processes will be standardized by the end of 1998 with an emphasis on improving customer service, adjudication quality, and overall consistency. The roll out of CLAIMS 4.0 across INS during 1998 will be the first step toward a single, Service-wide, naturalization system and will provide much of the automation envisioned in the redesign.

While everything described in the redesign cannot be realized by December 31, 1998, we are confident that the implementation plan will allow enough of the new process to be put in place to reap the bulk of the benefits. Automation enhancements will continue through 1999 as all of the redesign benefits are achieved. Once the redesigned process is fully implemented, the quality control mechanisms and the performance measurement systems built into the process will give INS the data needed to continuously improve the process to respond to our ever changing world.