



December 8, 2020

Submitted via [USCISPolicyManual@uscis.dhs.gov](mailto:USCISPolicyManual@uscis.dhs.gov)

Office of the Director  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
Camp Spring, MD 20529

**Re: Volume 12: Citizenship and Naturalization, Part E, English and Civics Testing and Exceptions, Chapter 2, English and Civics Testing**

Dear Ladies and Gentlemen,

Literacy Pittsburgh respectfully submits this comment to the U.S. Citizenship and Immigration Services regarding Policy Manual Update for Civics Educational Requirement for Purposes of Naturalization – Volume 12: Citizenship and Naturalization, Part E, English and Civics Testing and Exceptions, Chapter 2, English and Civics Testing.

For 38 years, Literacy Pittsburgh has been building better lives through learning. The American Dream is alive within Literacy Pittsburgh—for those left behind, for those who just arrived, for those who never give up. As the largest adult education provider in Pennsylvania, we impact more than 5,000 individuals in our region each year. Approximately half of our students are immigrants who rely on us for English language learning, human services coordination, and preparation for citizenship.

We are witness to the transformational power of education every day. Thousands of students enrolled at Literacy Pittsburgh make significant educational gains. The skills and self-confidence they develop enables them to pursue their goals, whether those may be college, career, business ownership, citizenship, better parenting or other worthy pursuits. With each achievement, the cycle of poverty is disrupted, and the positive impact multiplied for the whole family for generations to come.

Our history and our experience welcoming newcomers to the United States demands that we call your attention to the negative impact we anticipate from the changes to the Civics Portion of the Test.

1. Some of the new test questions or re-phrasing of existing questions require a higher level of English comprehension, making it harder for low-level English language learners to respond correctly. A quarter of the new questions introduce new topics not currently covered in most citizenship instruction and the answer choices include abstract concepts that do not add value. Further, most of the new questions address old content with new, more demanding language. These changes unnecessarily increase the difficulty of the test.
2. The increase in the number of study questions and the number of test questions puts greater demands on students, teachers, and volunteer tutor preparation time, at best lengthening the time for naturalization preparation and at worst discouraging immigrants from pursuing citizenship. The

additional questions will also increase the interview time for each applicant, which will in turn draw on already overtaxed resources at USCIS.

3. The process for development of the new test represents a considerable departure from processes for previous test updates in terms of expertise, stakeholder feedback and pilot testing. This departure sets a dangerous precedent and further undermines confidence in the immigration system.

Literacy Pittsburgh has prepared nearly 250 immigrants to become citizens over the past ten years. In our experience, this is an arduous process for all immigrants at all English language proficiency levels. The changes to the test unnecessarily increase the difficulty of an already difficult process. When coupled with the increased application fees, these changes will serve to slow the naturalization process for many immigrants and potentially disincentivize others from embarking on the process, robbing our country of the valuable contributions of too many newcomers.

Thank you for the opportunity to submit comments on the proposed changes. Please do not hesitate to contact me at (412) 393-7637 to provide further information.

Sincerely,

A handwritten signature in black ink that reads "Carey A. Harris". The signature is written in a cursive, flowing style.

Carey A Harris  
Chief Executive Officer

