

United States Senate

WASHINGTON, DC 20510

November 19, 2025

The Honorable Joseph Edlow
Director, U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Dear Director Edlow:

We write regarding U.S. Citizenship and Immigration Services (USCIS)'s action that will negatively affect naturalization and recently naturalized individuals. With little public warning or opportunity for public input through the formal notice-and-comment procedure, USCIS made significant changes to the naturalization civics test, to the detriment of those who file their naturalization applications on or after October 20, 2025. Encouraging naturalization has long been a bipartisan goal, yet USCIS has taken actions that will harm those seeking to become citizens while serving no legitimate public policy interest.

On September 18, 2025, USCIS announced the revival of the 2020 Naturalization Civics Test issued under the first Trump administration. Among other changes, this version of the test increases both the number of potential questions and the difficulty of these questions. These changes came after you stated that the civics test is "just too easy."¹ However, when the Institute of Citizens & Scholars studied the issue, it found that the only one in three Americans would pass that test.² Despite this, USCIS failed to present substantial evidence or a compelling justification demonstrating that the revisions are necessary to fulfill statutory requirements under the Immigration and Nationality Act. This lack of justification was exacerbated by USCIS's failure to provide meaningful opportunities for public input or to engage with experts in naturalization, as the agency only offered the option to provide feedback via email after the rule was already in effect. This sudden and arbitrary overhaul of the civics test will disproportionately impact vulnerable applicants, including low-income individuals with limited access to preparation services, those with limited English proficiency or low literacy levels, and those who are elderly.

We are also deeply concerned that this change is part of a larger scheme to arbitrarily impose new obstacles to citizenship. In August, your agency announced an expansive approach to the statutory requirement that applicants have "good moral character" to become naturalized. Rather than requiring applicants to show an absence of disqualifying offenses, USCIS instituted a vague requirement that applicants affirmatively show they possess good moral character. Earlier this year, USCIS also froze the Citizenship and Assimilation Grant Program, a bipartisan program that has helped more than 375,000 lawful permanent residents prepare for U.S. citizenship.

¹ <https://www.youtube.com/watch?v=bGLfrdeHKO4&t=1035s>

² <https://citizensandscholars.org/resource/national-survey-finds-just-1-in-3-americans-would-pass-citizenship-test/>

We respectfully request that you provide written answers to the following questions no later than December 10, 2025:

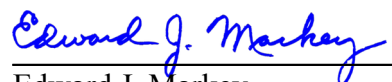
- 1) What substantial evidence or compelling justification does USCIS possess that the current civics test is insufficient to determine whether an applicant has “a knowledge and understanding of the fundamentals of the history, and of the principles and form of government, of the United States”?
- 2) What substantial evidence or compelling justification does USCIS possess that the changes to the civics test will better fulfill the statutory requirements of 8 U.S.C. § 1423(a)(2)?
- 3) What, if any, exigency required USCIS to hastily implement the changes to the civics test with little opportunity for public input? What factors did USCIS consider when determining the timing of this process, beyond a clear interest in making these changes as quickly as possible? Please include the consideration given, if any, to the specific impact on vulnerable applicant populations, such as the elderly, low-income applicants without access to test-preparation assistance, and applicants with low literacy or limited English proficiency.
- 4) What feedback did USCIS receive in response to the 2020 pilot and subsequent test changes that was considered during the decision-making process leading to the implementation of the 2025 civics test revisions?
- 5) With which non-governmental organizations or outside experts did USCIS consult with regarding the revision of the civics test? Of those organizations, which ones do not explicitly advocate for a reduction in legal immigration?
- 6) What direction has USCIS solicited or received from White House officials on changes impacting the naturalization process? During the process of promulgating this rule, are you aware, or is there any written evidence, of any direction from the White House to reduce the number of naturalized U.S. citizens?
- 7) Given the need for naturalization applicants to understand the history of the United States, why has USCIS taken the counterproductive step of cutting funding to programs that teach naturalization applicants the history of the United States, like the Citizenship and Integration Grant Program?

The Administration’s decision to make the naturalization process more arduous for long-time residents will have lasting consequences for our communities and immigration system. We urge USCIS to rethink these concerning policies and protect the pathway to citizenship that has driven inclusion and progress in our country for decades.

Sincerely,



Mazie K. Hirono
United States Senator



Edward J. Markey
United States Senator



Adam B. Schiff
United States Senator



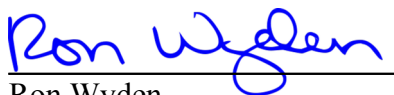
Richard J. Durbin
United States Senator



Alex Padilla
United States Senator



Tammy Duckworth
United States Senator



Ron Wyden
United States Senator



Cory A. Booker
United States Senator