Appendix B: Naturalization Process Changes Memorandum

Memorandum

HQ 70/33

Subject: Naturalization Process Changes	Date:
	MAY 1, 1996

To: All Regional Directors Fro Office of All District Directors m: Examinations

All Officers-in-Charge All Service Center Directors

All ADDEs

Since naturalization was identified as a major reinvention effort in April, 1995, the Service has undertaken a complete review of the naturalization process and identified areas which can be streamlined to increase our ability to provide more efficient and effective customer service to naturalization applicants.

To achieve maximum results in the quickest time period and to improve the quality of our work, we have developed guidelines for streamlining the naturalization process. These guidelines are based on numerous discussions and meetings of Service field staff regional offices and Headquarters as well as outside subject experts, community-based organizations, and focus-groups. The recommendations of new ideas and innovative procedures that have resulted from such discussions have been tested at various Citizenship-USA pilot sites with remarkable results. In view of the successes of the pilot sites, our desire is to expand these new initiatives Servicewide to all offices.

The attached memorandum highlights these guidelines for the streamlined naturalization process. Most of the action items can be implemented immediately. Others that have major long-term

effects may take longer to implement. Service personnel are encouraged to follow these guidelines and modify them necessary, in keeping with the stated goals of the initiative as well as to fit the particular needs of each office. However, to ensure consistent implementation of general policy guidelines, district offices are required to notify the Office of Field Operations (HQOPS) and the Benefits Division (HQBEN), through the appropriate channels, of any modification that they wish to undertake.

It should be noted that in the search for these solutions, every effort has been made to ensure consistent treatment of all applicants and to protect the integrity and dignity of the naturalization process.

Louis D. Crocetti Associate Commissioner

Attachment

NATURALIZATION PROCESS STREAMLINING INITIATIVES

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Part 1. Application No.1

Keeping Our Customers Informed

A vital part of the stepped-up Citizenship USA Initiative is to help our customers readily obtain current and accurate information on the naturalization process.

To assure that this priority is met, the Headquarters Benefits Division is developing the following items that can be disseminated to field offices, community-based organizations (CBO) and other entities, and in some cases, individuals seeking information about the naturalization process:

- Our naturalization pilot project is finalizing a poster stressing that applicants in the four key districts (LA, MIA, CHI, and NYC) must now file their N-400 at an appropriate Service Center, applicants are encouraged to call the 1-800 number for forms and information about where to file the N-400. The poster will be distributed to field offices, beginning in April 1996. In addition, a brochure will be packaged for printing and dissemination during the third quarter.
- News releases and flyers answering the most frequently asked questions on the naturalization process are being prepared for distribution to field offices, CBOs, and other entities during the third quarter. For example, questions range from how someone applies for citizenship, where forms can be obtained and where to file an application. The news releases are intended to provide accurate information to the public, prompting the submission of complete applications from persons eligible to seek the benefit. The Headquarters Public Information Office will prepare the news releases and pamphlets and distribute them to the field offices, which, in turn, will provide the items to the general public and local CBOs. The Customer Service Branch of HQBEN will assist in mailing the information materials to the CBOs.

Part 1. Application No.2

N-400 Form Revision

The Service has determined that the current naturalization application form, N-400, is too complex, confusing and needs revision. As a result, a working group is revising Form N-400 to make it more user friendly. The revised Form N-400 will incorporate Forms N-600 and N-643 and include data collection for voter registration. We are currently investigating the possibility of using the N-400 data to produce a card size naturalization certificate and to support the Department of State in the issuance of United States passports. We are also reviewing the possibility of including an option which would allow the applicant to request a supplemental citizenship card. These are policy issues, however, which must be fully researched and addressed by the General Counsel's office before implementation.

HQADN is making an effort to ensure that the new N-400 will contain instructions that are explicit, clear, and easy to understand. Applicants will also be informed of what documents to bring with them to their naturalization interview to avoid unnecessary delays. Revision of the N-400 will be expedited for earliest availability. HQADN is targeting August, 1996 for publication of the revised N-400 for public comments.

Part I. Application No.3

Filing N-400 Applications

(A) Direct Mail

The Service has determined that filing naturalization applications (N-400) at the district offices results in ineffective customer service and inefficient use of available resources, On January 31, 1996, the Service implemented Direct Mail in the Los Angeles, Miami, New York and Chicago Districts as part of the Citizenship USA initiatives. Use of Direct Mail will reduce processing times for adjudicating N-400s and enable the Service to provide applicants with more accurate information regarding their case status an efficient and expeditious manner. Direct Mail will also reduce the number of in-person visits to local Service offices, thereby improving the Service's ability to provide better customer service.

HQADN is in the process of expanding the Direct Mail program to include other types of applications, such as I-765, I-90, and I-485 for employment based applicants. These Direct Mail expansions will lessen data entry and processing burdens for all district offices and enable them to shift available resources to meet the demands for quicker interviews and more frequent oath ceremonies. The expansion of the Direct Mail Program is a continuing effort. HQADN is working diligently towards early implementation of full Direct Mail (DM III) and to convert all offices to CLAIMS. In DM III, all applications, with a few exceptions, will be mailed directly to Service Centers for receipting, data entry, and adjudication. Only those applications that require an interview will be referred to the field offices for decisions.

(B) 2-D Bar-coding N-400.

As a first step toward electronic filing, the Service is piloting the 2-D barcode and optical scanning of the N-400 application through our naturalization pilot project in southern California IRM and Western Region Customer Service staff are training personnel at a Los Angeles community-based organization (CRO) to key in information on N-400s with newly developed software featuring the 2-D barcode. The CBO training will also help INS identify and correct problems in the barcode and scanning software. In mid-April, the CBO will begin filing the barcoded applications directly with the Western Service Center where the forms will be scanned optically.

This streamlined Direct Mail system is intended to reduce initial clerical data entry, which will cut production costs, decrease keying errors, and expedite the application process. Interviews will be scheduled and conducted at appropriate local office sites.

To enhance the development of a practical, expanded 2-D barcode system, a Users Group of INS staff and our customers is being formed to implement the new process at other Service Centers during the fourth quarter and make the 2-D barcode specifications available to potential users.

Part II. Adjudication No.1

Informing Applicants of Documentation Required At Interview

Currently, naturalization applicants are rescheduled for interviews if they fail to provide Adjudications Officers with documentation necessary to conduct the interview. Often thenaturalization applicant could have provided the required documentation if he or she had prior knowledge that such documentation was necessary. Advising applicants for naturalization prior

to interview of the documentation they may be required to submit at the interview can reduce the number of "re-interviews."

In addition to the documentation specified in the instructions on the N-400 application, applicants should be advised to bring the documents noted on the attachment to their interview.

Offices are urged to begin sending naturalization applicants this documentation list with the notice of interview as soon as possible. Offices that are not on NACS can attach this documentation list directly to the notice of interview. Those offices that are currently on NACS may either send the attached notice with the NACS mailer or separately. In the meantime, HQBEN is diligently investigating the possibility of having the notices of interview (including the listing of required documentation) printed at the Service Adjudication Centers. Hopefully, such notices of interview could be completed in the next six to eight weeks.

Part II. Adjudication No.2

Good Moral Character

An applicant for naturalization must establish that he or she is a person of good moral character (GMC). Although good moral character is not specifically defined, it has been interpreted to mean a person's adherence to the moral standards of the average citizen in the community in which the applicant resides.

District Adjudications Officers (DAO) must make a determination whether the applicant possesses the requisite GMC for purposes of naturalization. In making this determination, DAOs should primarily focus on the 5-year statutory period prior to filing of the N-400 application. Part 7 of the N-400, entitled Additional Factors of Eligibility has 15 questions which contain most of the grounds for finding a lack of GMC. In addition, DAOs should always ask the applicant the following questions, if applicable:

- Have you ever failed to pay, or refused to pay, alimony, or failed to comply with a court order to pay alimony?
- Have you ever failed to pay, or refused to pay, child support or failed to comply with a court order to pay child support?

If an applicant admits to having committed or been arrested, sentenced, or convicted for any crimes or offenses in violation of the law, or if the file contains evidence of any crimes or offenses, DAOs must focus on the number and type of offenses to determine whether the applicant lacks GMC based on this evidence.

DAOs should note that a person will always lack GMC if, during the 5-year statutory period, he has committed one or more "crimes involving moral turpitud" (CIMT). The most common definition of a CIMT is "an act of baseness, vileness or depravity in the private and social duties which a man owes to his fellow men or to society in general, contrary to the accepted and customary rule of right and duty between man and man." Attached is a checklist of some of the

crimes or offenses that fall under the CIMT category. If the applicant gives an affirmative response to any of the questions involving GMC in Part 7 (Questions No. 8, 9, 12, and 15) or if the cases involves CIMTs, DAOs should refer the applicant to a secondary officer for a traditional interview format.

CIMT CHECKLIST

This checklist is designed to provide a quick reference to the types of offenses which the Board of Immigration Appeals has found to be "Crimes Involving Moral Turpitude." This list is not exclusive and DAOs should consult with Service counsel for more in-depth information.

Crimes Against The Person Sexual and Family Crimes

Murder/Intentional Homicide Assault w/ Intent to Commit Abortion

Voluntary Manslaughter Attempted Assault w/ Intent to Commit Carnal

Homicide by Reckless Conduct Abuse

Involuntary Manslaughter w/ Reckless Statutory Rape/Rape

Disregard Indecent Assault/Sexual Battery

Attempted Murder Adultery
Kidnapping Mayhem Bigamy
Assault or Attempted Murder Upon Prostitution
Government Officers Sodomy

Carrying a Concealed Weapon w/ Intent to Gross Indecency

Use Contributing to the Delinquency of a

Against the Person of Another Minor/Sexual Acts

Assault w/ a Deadly Weapon Taking Indecent Liberties w/ a Child

Assault w/ Weapon Likely to Produce Bodily Incest

Harm Oral Sexual Perversion

Interfering w/ a Law Enforcement Officer Crimes Against the Government

w/ Use of Deadly Force Falsely Issuing a Narcotic Prescription

Attempting to Obstruct/Impede the Progress Offering a Bribe

of Justice Making, Passing, or Possessing Counterfeit

Aggravated Assault Against a Peace Officer Coins

Crimes Against Property Conspiracy to Violate IRS Laws

Securities Fraud

Attempted Arson Counterfeiting

Blackmail/Extortion Smuggling Merchandise
Forgery Impersonating Federal Officer
Uttering a Forged Instrument/Forged False Statements/Firearm
Prescription False Statements or Entries

Making False Statements of Financial Harboring a Fugitive

Condition Using False Names & Addresses to Violate

Robbers' Postal Laws

Embezzlement Uttering/Selling False/Counterfeit Immigration

Larceny/Theft Documents

Grand theft False Statements to Obtain a Passport Petty Theft False Statements in LPR Application

Receiving Stolen Property Concealing Assets in Bankruptcy Encumbering Mortgaged Property w/ Intent to Defraud Fraudulently Issuing Check w/ Insufficient Funds Fraudulently Issuing Worthless Check Illegal use of ATM or Credit Card Passing Forged Instrument Attempted Fraud Using Mails to Defraud Making False Statements in Acquisition of Firearm Securities Fraud Welfare Fraud Transporting Stolen Property Obtaining Money by False Pretenses Bribery

Perjury
Theft from U.S. Mail
Taking Kickbacks
Receiving Funds by False Statements
Trafficking in Narcotics
Failing to Report Income
Union Official Unlawfully Accepting a Loan
Kickbacks on Government Contracts
False Statements/Selective Service
Falsely Representing Social Security Number
False Statements/Unemployment Benefits

Part II. Adjudication No.3

Malicious Trespass

FD-258 Checks

(A) Reduction in Wait-Time for FD-258 Checks.

Under existing procedures, district offices wait 60 days for the FBI to return fingerprint-check (FD-258) results. The FBI's current processing time is in excess of 30 days. The Service is currently working with the FBI to reduce the fingerprint check turn-around time to less than 30 days to enable faster processing of the N-400 applications by field offices. In addition, we should all note that that processing times begin after receipt of the FD-258s from submitting offices, offices should make every effort to ensure these checks are timely initiated.

To reduce the average time required for background checks, it is essential that FD-258 submissions are properly prepared. To improve the quality and integrity of the fingerprints submitted by applicants for benefits, a designated fingerprinting service (DFS) certification program is being implemented once the enabling regulation is approved by OMB. Training of Service personnel was completed last fall and training of potential DFSs is underway in LOS, MIA, NYC, SFR and CHI District offices are encouraged to inform potential providers of fingerprinting services to obtain the necessary training as soon as possible. Upon publication of the DFS final rule, there will be a six-month transition period to phase out the unauthorized fingerprinting services. At full implementation of the DFS program, the Service will only accept fingerprints taken by authorized entities and individuals.

As a quality control measure, beginning May 1996, the Service will establish the Nebraska

Service Center (NSC) as the coordinating center and central processing facility for all G-325A and fingerprint responses. HQBEN has arranged for the FBI to forward all such responses, including rejects, illegible fingerprints, and "hits" directly to NSC, which will be responsible for receiving, monitoring and distributing all information related to these checks. The FBI will be notified of this procedural change. In addition, HQREC is assigning a responsible collateral duty fingerprint specialist at each adjudicating office to receive information and serve as liaison. In order to ensure these procedures are effective, we are incorporating a monitoring element into the Field Assessment Program being established by Internal Audit. Internal Audit will provide us with the ability to monitor and identify the cause of late submissions, and ensure all FD-258 checks are initiated immediately upon receipt of the N-400.

(B) Implementation Guidelines

1. Agency check liaison duty

As directed by HQREC, district offices should designate a point of contact (POC) in each field office to serve as the liaison between the NSC and the adjudicator responsible for an application decision. The POC will receive instructions daily from the NSC of all agency "bits" and rejected forms (either FD-258 or G-325A). For hits, the instructions will provide notification that the related file will follow. For rejected forms, the instructions will notify of the required hold and provide for follow-up action. Rejected and non-classifiable fingerprints will no longer be returned to the adjudicating office for correction but instead will be handled through the NSC.

Directors are advised that the POCs responsibilities will include handling classified documents.

2. Designated fingerprint services.

Upon publication of INS No. 1666-94, Certification of Designated Fingerprinting Services, all offices adjudicating applications for benefits which require submission of Form FD-258 will have 180 days in which to adjudicate applications for designation as "DFS". Critical to this adjudication is ensuring applicants are provided the opportunity to gain required training.

Each office has a trained FD-258 trainer in place at this time. That person has been provided with training materials and contact telephone numbers at region and headquarters for additional support and information. Regulations will specify that only INS or FBI trained fingerprinters may prepare FD-258s. An INS or FBI trained fingerprinter may train others at the DFS in the procedure. In order to reduce the effect of this training requirement during the implementation period, trained fingerprinters should be actively communicating with potential DES applicants and providing pre-training. It should be emphasized that the training is voluntary and provided on a voluntary basis. Trained fingerprinters should also inform potential DFS applicants that, while the training will meet the requirement of the regulation if published, it does not imply eligibility or guarantee approval for certification beyond the training requirement.

Reduction in Wait-Time for A-file Requests

Under current procedures, an Adjudications Officer waits for 6 months from the time the applicant's A-file was requested to conduct an interview without the applicant's file. This procedure, however, unnecessarily delays the processing of naturalization applications and, for the majority of applicants, the entire record is not necessary in order to review the events of the last five or three years (residency requirement for naturalization). Many recent events or actions can be gleaned from records checks and applications review.

As a result, this process is being changed to permit district offices to wait only 30 days for a requested file before proceeding with the interview and adjudicating the applicant's N-400 based on a temporary file. On February 21,1996, the Office of Records sent a cable (HQRECIRPB 70144.2-C) to all field offices outlining the procedures to be followed for requesting and transferring A-files, including procedures for files that cannot be requested through the Central Index System (CIS). These new procedures speed up the A-file transfer process and ultimately, the amount of time it takes to schedule an applicant for an interview.

Effective with this memorandum, an office is allowed to create a T-file after the A-file request has been pending for 30 days. Note, however, that there are a few exceptions to this policy. First, a T-file should not be created or the case adjudicated without the file if the adjudicator has evidence that the applicant fraudulently obtained permanent resident status. Second, this process should not be followed if, after verifying in CIS, the A-file transfer subsystem code is "P", "D","A"or"F'. In this scenario, you should not complete processing of the case, unless it is clearly deniable without first reviewing the A-file or after you have received verification from the holding office that information contained in the A-file does not make the applicant ineligible for naturalization. (Please see the instructional wire referenced earlier for additional information.) Third, this policy should not be followed if other circumstances exist, as determined by the District Director, which would necessitate the review of the A-file prior to adjudication of the N-400. In most other situations, the interview can be conducted and a decision reached on the application with only the T-file in the possession of the adjudicator. The A-file should be post-audited within 30 days.

Offices should not wait until the interview is scheduled before requesting the A-files. The requests should be made at the time of <u>receipt</u> of the application either as part of the daily NACS FTR (file transfer request) process or directly through CIS. Cases which have been filed at the Service Centers through the Direct Mail Program should have the NACS FTR or CIS FTR completed at the time of data entry. All other offices which are not receiving the applications through the DIRECT MAIL program will need to initiate the A-file requests at their office.

Part II. Adjudication No. 5

Testing naturalization applicants on United States history and government and the English language to fulfill the requirements of section 312 of the Act during the interview process is time-consuming. Alternative testing procedures will help both adjudicators and applicants.

The Service plans to re-engineer and improve the policy and process of testing applicants by implementing a three pronged action plan. This plan will provide field offices with needed guidance on establishing group testing of naturalization applicants. In addition, we will publish a proposed rule that will effectively govern the testing organizations. We are also considering further regulatory revisions that could expand the current number of testing organizations authorized to administer the citizenship test. Finally, we are investigating alternative methods for applicants to demonstrate the requisite history and government requirements of section 312.

(A) Alternative Method of Demonstrating Section 312 Knowledge.

The Service is currently investigating whether to accept academic completion records of naturalization applicants who have attended school in the United States for at least two years and who subsequently graduated from United States high schools, colleges, or universities as a possible means of satisfying the requirements of section 312. Almost all graduates of United States secondary schools, colleges or universities must fulfill various requirements for course work in American history, government, and civics. Preliminary survey information compiled in 1994 indicated that almost all applicants holding degrees from American schools or colleges had no difficulty demonstrating English literacy or answering questions on history and government. The Service believes that applicants who fall in this group could possibly be accepted as having satisfied the section 312 requirements without compromising the intergrity of the naturalization process. However, this is a major policy issue which must be fully researched and addressed at the national level before a decision can be made.

(B) Group Testing.

The Service has learned from the non-government testing organizations that group testing of naturalization applicants in a group setting is an efficient, effective, and productive way for applicants to fulfill section 312 requirements. Group testing, using a standardized multiple choice test comprised questions at various levels of difficulty, ensures that all applicants are treated fairly with regard to the questions that are asked. In addition, without lessening the integrity of the testing process, group testing, when conducted as a pre-interview exercise, saves the government time by establishing an applicant's knowledge of English and history prior to the scheduling of valuable interview time. Policy guidelines highlighting the methods which have lead to the success of the group testing efforts currently used by the Citizenship USA sites as well as the Baltimore District Office are provided below.

While it has been the tradition of Service offices to test applicants on questions of English literacy and United States history and government during the naturalization interview, several offices are now experimenting with the concept of group testing applicants prior to the start of the formal interview. This method of group testing should bring about three positive results. First, applicants will be put at ease in that they will not be asked history or government questions during the course of their interview. Second, district adjudications officers (DAOs) will have more time to address other issues needing clarification during the interview process. Third, it will increase our processing capacity by shortening the average duration of a naturalization interview.

The Baltimore office has instituted a new policy of testing naturalization applicants at the time they file the N-400. Applicants are given a ten question, multiple-choice test. District Inspectors (on detail) and DAOs rotate the responsibility of proctoring the actual multiple choice test, and ensure that no applicant waits over five minutes to be given a test, even if that means the applicant is tested individually. In addition, applicants who seem to have difficulty expressing themselves in English are tested on their ability to speak English. All applicants are evaluated on their ability to speak English, not simply those who demonstrate difficulty during the N-400 prescreening. All of these events happen prior to the scheduling of an interview, thus saving the office valuable interview time.

The logistics of testing in larger offices are more challenging, but not impossible. The Chicago district has instituted a group testing procedure both in the district office and at certain community-based organizations, and Los Angeles is experimenting with alternative methods similar to those used by many state motor vehicle drivers license bureaus.

Regardless of whether an office is large or small, adopting the following two suggestions will aid the group testing process. First, this testing concept should be discussed with the local AILA and other attorney and community groups. Second, offices should seek the assistance of local voluntary agencies in order to disseminate information on group testing to the immigrant community. (While voluntary agencies should not be given the responsibility of proctoring Service 312 tests on behalf of the Service, they may be of assistance in arranging testing space if testing occurs outside of the district office.)

Offices also should be advised that we are developing a standardized written and oral test for use by all Service offices with applicants who have not used the services of private section 312 testing organizations. We are working to contract out the actual test development, and hope to have new procedures in place early in calendar year 1997. In addition, local offices needing updated lists of and government questions or sample tests should contact the HQ Benefits Division Naturalization & Citizenship Services Branch at the telephone number listed below.

Offices seeking more information on group testing should contact Richard Caterisano, ADDE. Baltimore on 410/962-2118 or the Citizenship USA test sites of either Chicago or Los Angeles (Aphrodite Loutas in Chicago on 312/1886-7549 and Don Neufeld in Los Angeles on 213/894-6004). Questions may also be directed to Pearl Chang, Acting Chief, Naturalization & Citizenship Services Branch or Craig Howie, Adjudications Officer on 202/514-5014.

(C) Proposed Regulation for Outside Citizenship Testing Services.

The Service is also in the process of finalizing a proposed rule which will completely restructure 8 CFR 312. This change of 8 CFR 312 constitutes a major policy decision on the part of the Service. The current Notice of Program does not impose rules or guidelines on the non-government testing organizations. In some instances, this has led to abuses by a few affiliated testing organizations In an effort to cure this situation, the revised g CFR 312 will impose exacting -performance, quality control, and revocation standards on these organizations. In addition, the Service is considering expanding the accessibility of outside testing entities through the use of additional testing centers. We anticipate publication of the proposed rule this spring, and implementation of the final rule in the late fall, 1996.

Part II. Adjudication No.6

Alternative Examination Methods

Our current interview scheduling pace needs to be recalibrated to take advantage of the timesaving strategies outlined in this paper. To that end, the Service is proceeding with the introduction of Alternative Examination Methods (AEM). The use of these methods is proposed to assist and speed up the naturalization process for various groups of naturalization applicants, without compromising the integrity of United States citizenship.

While the Service has traditionally used a generic, one-size fits all type of naturalization interview, some offices have experimented with their own creative methods to handle the ever-increasing numbers of applications. These offices have enthusiastically reported that use of these alternatives has resulted in a more streamlined naturalization process. A combination of prescreening methods, group testing, primary and secondary interviewing, and off-site interviewing makes for a more efficient interview process.

For example, the Chicago office pre-screens N-400 cases in conjunction with not-for-profit, local community organizations. These organizations, in coordination with INS, provide off-site areas on a weekly basis where residents can complete the N-400 packet. They ensure that the packets are properly completed prior to filing the applications in bulk (approximately 300 each time) with the Service. Problem cases are resolved prior to filing with the Service either by telephone or referring the applicant to an attorney. Off-site interviews are scheduled and processed by the Service. Such pre-screening and off-site interviewing allows for a much faster N-400 interview.

Another method that some offices have employed for more efficient interviewing is a primarysecondary arrangement. The primary-secondary arrangement allows offices to "fast-track" certain applicants, such as those who have already satisfied the section 312 requirements through prior testing by the Service (e.g., legalization applicants) or an outside testing entity, or who are exempt from the section 312 requirements based on age or disability. Routine interviews can be handled by less experienced officers, designated as primary interviewing officers. For cases which require an in-depth Q&A or involve potential fraud, the applicants can be referred to secondary for a traditional interview with more experienced or Senior Adjudications officers.

The Los Angeles office is currently utilizing the primary-secondary arrangement. The N-400 applicants are tested for English and civics prior to the primary interview. Those applicants who pass the English and civics exams are referred to a primary officer. Less experienced officers are designated as primary officers and more experienced officers are designated as secondary officers. The Los Angeles office has found that approximately 10% of their cases are referred from primary to secondary. The secondary officers also conduct primary interviews when they have no secondary interviews. Los Angeles has found that the primary interviews are currently taking about 8 minutes but may be shortened to around 5 minutes as the temporary employees

who are serving as primary officers gain experience.

The Form N-400 Supplement A (see attachment) has been developed to aid in the prescreening process. As mentioned previously in this memo, the Office of General Counsel is researching whether to accept academic completion records as a possible means of satisfying the requirements of section 312. If there is a favorable determination, the supplement may be used to identify the appropriate applicants and must be included with each N-400 distributed by those offices that opt for AEM. The supplement instructs the applicant to attach a copy of his or her diploma or degree. The N-400 Supplement A has been designed as a companion to the N-400 until that form is revised.

District directors of offices processing applications for naturalization are authorized to implement AEM immediately. For more efficient utilization of Service resources, district directors are urged to adopt AEM and to increase the number of scheduled interviews This use of AEM and streamlining of the naturalization process will aid the districts in meeting their FY96 production goals.

Part III. Processing No.1

Naturalization Certificates in Standard Size

Currently, the Service has experienced delays in the process of printing naturalization certificates because the size of the paper used is not standard. HQBEN is currently in the process of negotiating with the Bureau of Printing and Engraving to order standard size (8 1/2 x 11) naturalization certificates which will be used in standard laser printers. The Bureau of Printing and Engraving has indicated that it will take approximately three (3) months to make the change. HQBEN has requested that the printing of these certificates be made a priority. We are also exploring the possibility of issuing card size naturalization certificates through the new Integrated Card Production System (ICPS) at the Service Centers. A production timetable has not been established for this project yet.

In addition, capability to batch print Naturalization Certificates in NACS has been developed and implemented at the El Monte site in the Los Angeles District Office. Batch printing can save considerable time in certificate production and will be made available to other Citizenship USA sites in May, 1996.

Part III. Processing No.2

Logging Alien Registration Cards at the Oath Ceremony

Staff are required to collect and log green cards (Form I-551 I-151) at ceremonies and subsequently destroy them or send them to the ICF for destruction. The logging requirement is time consuming. Effective immediately, during naturalization ceremonies, officers in attendance will no longer log each individual Alien Registration Card (AR card) on the duplicate ceremony list. As Form I-151 is obsolete, these cards are to be destroyed along with Reentry Permits and Refugee Travel Documents upon surrender without a notation opposite the person's name on the ceremony list. In accordance with part 2117.14 of the Administrative Manual, the duplicate list will continue to be endorsed as follows: "All AR cards, (except I-551s), reentry permits and refugee travel documents surrendered have been mutilated and delivered for destruction of record material."

When collecting AR cards, District Offices may use volunteers or contract employees under INS supervisions to collect surrendered 1-551s. A corner should be clipped from the Forms 1-551 surrendered. District offices <u>must</u> note on the oath manifest whether a naturalizing citizen turned in his or her Alien Registration Card or an attestation for lost or stolen cards. The clipped 1-55 Is will be forwarded to the Immigration Card Facility with a copy of the ceremony list. The Immigration Card Facility will be responsible for the destruction and notation of surrendered 1-551s on the duplicate list.

Officers conducting naturalization interviews and/or officers in attendance at naturalization ceremonies will not require applicants to complete affidavits for a lost or stolen card. Instead, an attestation form may be given to the applicants either at the interview or the check-in time for the oath ceremony. In the event a card is surrendered subsequent to the ceremony, I-151s are to be destroyed. 1-551s are to be clipped and forwarded to the ICF.

Part III. Processing No.3

Affidavits or Attestation of Lost or Stolen Alien Registration Cards

Affidavits of lost or stolen Alien Registration Cards will no longer be prepared either at the naturalization interview or at the ceremony for those individuals who do not produce the cards. Attestations will be required. Below is a sample Attestation of Lost Alien Registration Card that should be used for those applicants who have lost their ARC prior to the naturalization ceremony. This form can be provided to the applicant either prior to the ceremony by attaching it to form N-445, Notice of Oath Ceremony at the time of mailing, or when the applicant appears for the oath ceremony. HQBEN POC: Sue Arroyo, Senior Adjudication Officer at (202) 514-8247.

ATTESTATION OF LOST ALIEN REGISTRATION CARD

state under penalty of perjury that I have lost my alien registration

receipt card (the Green conditions:	n Card) on or about	under the following
possess both an alien r	registration receipt card and a I find my alien registration r	United States Government (8 CFR 338.3) to a Certificate of Naturalization. I also receipt card, I must immediately surrender it
Signature	Date	A Number
Dart III. Processing		

Part III. Processing No. 4

Unsigned Photographs and Handing Out Naturalization Certificate

District offices are reminded that regulations do not preclude the issuance of the Naturalization certificate prior to the oath of allegiance during Naturalization ceremonies. Issuing certificates at the end of a large ceremony adds time to the overall duration of a large ceremony. Eliminating this step may allow districts to have more than one ceremony in a single day. While small offices which have small infrequent ceremonies may want to continue to issue the certificates at the conclusion of the ceremony, large offices may wish to issue the certificates at check-in.

In the event naturalization certificates are issued at the preliminary check-in, precautions should be taken to ensure that no one leaves with his or her certificate prior to taking the oath of allegiance since naturalization candidates do not become citizens without taking the required oath. Exits will have to be monitored and participants will have to be reminded that they cannot leave with the certificate until they have taken the oath.

Whether the certificates are handed out prior to or after the ceremony, instructions for proper signature must accompany the unsigned certificates, explaining that the certificate must be signed by the naturalizing citizen and that the certificate will not be considered valid until properly signed. Instructions for proper signature on the certificate should be provided to the naturalizing candidates when they check-in for the ceremony. (See attachment 4) Handing out certificates with clear signature instructions will place the responsibility for signing the certificate on the naturalizing citizen and make the interview and ceremony processes more efficient.

Furthermore, much time is currently being spent during naturalization interviews to ensure proper signing of the photographs. District offices should devise ways to get the photographs signed prior to the interview.

Part III. Processing No.5

Automation

During October 1995, a working group consisting of personnel from EDS, HQIRM, HQBEN was formed to review and correct outstanding problems related to the current version of NACS (Naturalization Automated Case System). The list of 44 outstanding ticket "hot-line" items were reviewed line by line to defect problems and determine a viable solution. All problems were-categorized into the following: training/personnel problems, easy to fix problems and long-range correctable problems. Most problems have been corrected as a result of this working group.

Additionally, in November 1995, a telephone survey was conducted by HQBEN with each NACS office to see what problems still persisted. Training issues were defined and to date, several offices either have been or are scheduled to be trained or retrained on the current system.

At the same time, INS is developing a new LAN-based computer system to replace NACS. A pilot is set to begin in September, 1996 between the Nebraska Service Center and the Chicago District Office. After the new system has been tested, it will be implemented incrementally nationwide beginning January 1997.

It is imperative for every office that has NACS to use it for data integrity and to key in such data in a timely manner. When offices fail to timely enter data into the system, or fail to close out cases after oath taking ceremonies, analyses are skewed and re-programming efforts are impeded. Failure to close out cases puts additional strain on an already overburdened system. When cases are closed in NACS, information is captured by the Central Index System (CIS) regarding the applicants' naturalization. By not closing cases out in a timely manner, other operating units outside of Adjudications are affected because we cannot provide them with accurate information about the applicant's immigration status.

Part IV. Oath Ceremonies No.1

Partnerships with Community Groups

Effective partnerships with community-based, voluntary and immigration lawyers organizations must be expanded and accelerated immediately to help the Service meet its goal of naturalizing 1.3 million new citizens in Fiscal Year 1996.

During the last two quarters, field offices must step up their efforts to actively organize local groups to perform non-security tasks supporting the naturalization process, particularly those intended to facilitate oath ceremonies and support activities outlined in this paper.

District Directors and Officers-in-Charge who are not already doing so are encouraged to begin meeting regularly with community entities to encourage them to join the Service as full partners in enhancing awareness of naturalization and citizenship. These meetings will enable field offices to determine the assistance that the organizations can render to support our Citizenship USA initiative.

Although local groups should be urged to participate in the partnership on a voluntary basis while performing routine activities for ordinary events, field offices have the authority to enter into small purchase order contracts with these organizations for certain services related to special

occasions, such as extraordinary oath ceremonies commemorating special events or when large numbers of applicants will be sworn in.

The partnership tasks to be performed by the community groups may consist of the following:

- Under supervision of Service officers, provide assistance at the field offices to facilitate interviews as well as schedule and implement oath ceremonies.
- Under supervision of Service officers, distribute pre-approved forms and instructions to the public at field offices, or be designated by the field offices to distribute the forms and instructions at community sites.
- Under supervision of Service officers, provide the following oath ceremony assistance:
 - Identify, and obtain suitable sites for ceremonies.
 - Set up facilities for ceremonies.
 - Coordinate program activities for ceremonies (guest speakers, appropriate entertainment, printing and distributing programs, seating and closing details.)
 - Assist at actual ceremonies: screening N-445s for completeness, accepting alien registration cards, distributing naturalization certificates, other clerical tasks.

To facilitate field office efforts to involve the community organizations in the naturalization process, Headquarters and Regional Customer Service Outreach staff have been assigned to assist the field on as needed basis. Field offices seeking Customer Service assistance are advised to call the Headquarters Branch Chief at 202/307-3587.

Part IV. Oath Ceremonies No.2

Oath Ceremonies

(A) Guidelines for Administrative Oath Ceremonies

To meet the demand of record numbers of persons applying for naturalization, the Service is adopting a more innovative approach to the administration of oath ceremonies. The large but infrequent ceremonies that we have traditionally held, though dignified and having served the public well in the past, can no longer meet the public demand. Many times naturalization applicants wait for several months after their cases have been granted to participate in these large ceremonies. In addition, because large ceremonies typically require an enormous amount of preparation, field offices often have to shut down their normal examinations functions around ceremony time just to get ready. District offices are now given the option of varying the size of ceremonies and having frequent oath ceremonies on a more efficient scale to suit local circumstances. Depending on available resources, space, and backlog of applicants waiting or an oath ceremony, offices are now encouraged conduct same-day ceremonies or frequent ceremonies to meet their production goals. Frequent ceremonies on a smaller scale may be

adopted where district offices determine that they may enhance efficiency and improve customer service. Field offices are, however, required to maintain the dignity of the ceremony even in smaller ceremonies. When conducting administrative oath ceremonies, offices must follow these guidelines:

- A dignified oath ceremony should have appropriate space, prepared speeches, keynote speakers, and/or representatives from local media for coverage of the ceremony. While these factors should be present at any ceremony, offices may choose to add elements to the ceremonies which are unique to the local community;
- Ceremonies can be held both on-site, at an INS facility, or off-site, at a designated area.
 Various community groups and businesses may agree with INS to sponsor and provide off-site spaces for such ceremonies. Spaces should be clean and free from outside noise and distractions. Recorded or live music appropriate for the occasion, such as the national anthem, may be used. Flags of the United States and the INS should be prominently displayed;
- Speeches should be planned in advance and may be delivered by the district director, deputy district director, officer-in-charge or persons acting in their behalf from the local district office. (A sample speech is included for reference purpose.) Keynote speakers may be invited to attend the ceremony and address the new group of citizens. Speakers from local government agencies, civic groups, local colleges and universities and other organizations can function as keynote speakers;
- To add to the formality of the event, district offices can arrange to have the flags carried into the ceremony space by uniformed guards, Information Officers, uniformed youth groups, ROTC units, as well as boy or girl scout color guards; and
- Where feasible, offices should contact local media groups for coverage of the ceremony.

(B) The role of Corporate Sponsorship of Ceremonies

Due to increasing fiscal restraints on district offices, it is necessary to seek alternative and cheaper ways of performing naturalization ceremonies. One way of addressing the lack of financial resources is for field offices to seek out local businesses to sponsor the ceremonies. The ceremonies should be tasteful and maintain the dignity of the occasion. Off-site facilities, provided by local businesses, can serve as appropriate ceremonial rooms. Although a business may choose to donate items such as food and drinks as part of the sponsorship of the ceremony, logos and other items identifying the sponsoring business should not be the theme of the ceremony. Rather than focusing on the products or services a company produces, some corporate sponsors have chosen to stress the importance of the work of immigrants to their companies' success and more importantly, the role immigrant labor has played in the United States. While corporate sponsorship may be sought for naturalization ceremonies, the sponsorship of the event should focus on the importance of conveying citizenship.

For additional guidelines, please refer to attachment 3 for a list of oath ceremony 'best practices' used in other offices.

(C) Same-Day Naturalization Ceremonies

Where INS has the authority to conduct administrative ceremonies, field offices are encouraged to conduct expedited, small naturalization ceremonies at the option of applicants for naturalization. Based upon reports from field offices, this process can also be successfully implemented for judicial ceremonies. While coordinating same-day ceremonies for administrative naturalization ceremonies will involve no coordination with other agencies, judicial naturalization ceremonies will require additional preparation by field officers to plan the ceremonies in coordination with the courts.

Field offices are encouraged to develop work schedules to facilitate same-day ceremonies. Interviews may be conducted during one part of the day, such as the morning, and the ceremony conducted later that sane day. In addition, offices can provide applicants with a notice, offering them the option to be naturalized the same day of the interview, upon approval of the application, or to be scheduled for an oath ceremony at a later time when they can bring family members and guests. Accommodations should be set aside to allow for an expedited ceremony.

(D) Expedited administration of oath of allegiance.

A district office may administer the oath without a ceremony when an applicant requests such due to emergent or other compelling circumstances as prescribed in 8 CFR 337.3.

Part IV. Oath Ceremonies No.2 Attachment

Oath Ceremony Speech

Welcome to you all. It is an honor and a privilege to welcome you as citizens of the United States. By your oath of allegiance to the United States, you no longer have political ties with your former country of citizenship. Your allegiance is now exclusively to the United States. In return for the benefits you are given within this great land, we are entitled to your solemn word that you will support our Constitution and laws and defend us against our enemies if that need should arise. Of course, this does not mean you should forget your native land, your fiends, or family members abroad.

This nation has grown and flourished through the preservation of cultural traditions such as the music, dress and food of your homelands. Your heritage is part of your contribution to this great country. This nation is composed of the strengths of many nations and cultures. Each contributes the special skills and knowledge that has been acquired through the centuries. Each of you brings a special talent, a talent which, through hard work and dedication, will not only strengthen this nation, but provide you with success and achievement.

Our Constitution provides you with the opportunity to pursue your aspirations on an equal basis with all other Americans. This country promises you equality of opportunity, but it can not promise you wealth or wisdom. It promises you the pursuit of happiness, but it can not promise happiness. It promise you liberty but it cannot guarantee peace, only the opportunity to work with us to secure that peace. We, as a people, have made mistakes in the past and we will undoubtedly make errors in the future. But through good times and bad, this is a country of law.

Our constitution is a splendid document which continues to provide protection of property, liberty, life, social justice and personal freedom for every individual more than any other society in recorded history.

In short, you are now among us to share in our successes and our failures in good times as well as bad times. You are joining the great family of citizens enjoying the cherished principles of freedom. Being convinced that you will make good citizens, we your fellow citizens by birth and by choice, enthusiastically welcome you as citizens of the United States of America.

Part IV. Oath Ceremonies No.3

Memorandum

Subject Best Practices: Naturalization	Date:
	April 2, 1996

To: All District Directors Fro Office of All Officers-in-Charge m: Examinations All Regional Directors

All ADDEs

This is the first of a series of occasional memoranda on naturalization ceremonies designed to bring your attention to successful local program efforts that warrant recognition and emulation. We hope that field offices can find at least one thing in each of these programs that they can apply to their own work, and be inspired to generate "Best Practices" of their own.

In this first memorandum, we are featuring four district offices that have successfully coordinated special naturalization programs. These districts are El Paso, Chicago, Denver, and St. Paul.

Group Processing - El Paso, Texas

The El Paso District (ELP) office began a program called Operation Awareness in 1990. Under this program, ELP goes off-site to a local industrial complex to prepare eligible employees for naturalization. INS trains employees of the company to act as instructors in history and government to eligible company employees. While the employees attend classes, ELP processes the N-400 applications that were submitted, in a group, to the ELP district office. When both classes and processing are complete, ELP returns to the industrial complex and conducts naturalization interviews.

Due to the success of Operation Awareness. Catholic Social Services (CSS) of El Paso, a nonprofit organization, in coordination with the INS district office, began a similar program. CSS sent volunteers out into the community to educate permanent residents about the requirements for naturalization. CSS then worked with several of the El Paso public school systems to conduct civics classes for naturalization applicants. CSS was very successful in both areas. Many of the public schools in the commuting area are conducting adult education classes dealing with history and government studies.

The classes have been filled to capacity since the program began. During the first class, containing approximately 25 to 30 students, the N-400 is filled out in pencil. The teacher then-collects all the N-400s and gives them to CSS for review. Correct applications are set aside. Applicants who have supplied incorrect or incomplete information are contacted by CSS. Corrections are made before the second class where the N-400 is then completed in ink. Photos and fingerprints are then taken, and then CSS re-collects the N-400, along with the photos, fingerprints, money (checks only), and supporting documentation for submission to ELP. Applicants with complicated cases are advised to contact ELP or an attorney and are advised to not file through this program.

When the classes are complete, ELP goes off-site (away from the district office) to conduct interviews. CSS arranges for the location and assists ELP wherever possible. ELP conducts 2 or 3 off-site interviews a month, usually sending 2 or 3 examiners and 2 clerks. INS has found that an examiner is able to interview 30 to 35 applicants off-site, while on-site they are only able to do 20 because of normal office interruptions.

No-shows are granted a second interview at the ELP office within 2 weeks of the initial interview. Those who fail the exam are rescheduled to appear at the ELP office within 2 months of the first interview.

After the interview, if ELP determines that the applicant is eligible for naturalization, the applicant is directed to the INS clerks who have the applicant sign the naturalization certificate and photos. The clerks then issue a setter to provide information on the date, time, and location of the swearing-in ceremony.

CSS generally makes the arrangements for hearing locations. In most cases, local school auditoriums are used. Applicants rarely need to wait for more than 2 weeks to be sworn in. Because the federal courts in El Paso have retained exclusive jurisdiction, the federal judge travels to the location to conduct the ceremony. It is not uncommon for the local students to become involved with the ceremonies. The band and/or chorus perform the national anthem.

There is usually a student honor guard to present the flag, and home economics classes provide refreshments and decorations.

An evaluation of the ELP group processing program follows:

- CSS and INS show that 94% of the applicants using the program pass the naturalization interview while those who file on their own have a much lower success rate.
- From start to finish, there is a wait of 8 1/2 months for those who file with CSS and an 11 month wait for those who file by themselves.
- INS has found that the number of people coming to the INS office for naturalization has decreased significantly while the number of N-400 applications have increased.
- Publicity for the naturalization program has been very good; the public and INS both like the program.
- INS has received some complaints from those not participating in the naturalization program about unequal treatment.

Group Processing - Chicago, Illinois

In 1992, the United Neighborhood Organization (UNO) of Chicago, a not-for-profit organization, conducted a study of legal immigrants in Chicago. UNO staff went from door to door in census tracts with large alien populations.

The name and adjustment date of every permanent resident that showed an interest in naturalization was input into a computer program. Then, when an LPR meets the time requirements to file for naturalization, UNO mails a computer-generated card to these permanent residents, inviting them to attend a special event promoting naturalization.

UNO, in cooperation with INS, conducts weekly events in Chicago. Those permanent residents who wish to apply for naturalization are able to do so without going to the INS office. These events are held is churches, schools, community centers, banks, or anywhere UNO can get space. Advertisements are posted in churches, schools, on television and radio stations.

Eligible permanent residents complete the N-400 at the event with someone from UNO assisting. Photos and fingerprints are also taken during the event. At the end of the event, UNO gathers up all the applications for bulk filing with INS. The average event produces approximately 300 applications.

UNO then reviews each application to make sure they are complete and contain all the necessary information. Any problems are resolved either in person or over the phone. Any applicants with problems are advised to contact an attorney, and not to file their applications through UNO. When UNO feels that everything is correct they (UNO) file all the applications with the INS district office.

UNO then arranges for off-site interview locations. INS generally conducts 15 off-site interviews a month with anywhere from 60 to 100 applicants being interviewed at each site. INS usually sends 3 adjudicators and 3 clerks, with UNO assisting where necessary. Both INS and UNO

claim a 97 percent success rate among the applicants. Applicants who fail the civics and/or written parts of the test are rescheduled for an interview at the INS district office at a later date.

After the interview, eligible applicants are notified by mail of the time, date, and location of the oath ceremony. Because the judges in Chicago have retained exclusive jurisdiction, INS cannot provide the applicants with this information at the time of interview.

The highlights of this program are:

- INS finds that group processing produces complete, correct applications.
- INS and UNO both feel that with the off-site interview process, applicants are more relaxed, making the pass rate higher, as well as making the naturalization process more inviting.
- Visits to the INS office have decreased, and the adjudicators welcome the off-site interviews as a change of venue. There have been no extra costs incurred by INS in the off-site processing, other than gas for automobiles traveling to the off-site locations.
- Publicity gained from the off-site interviews has been very positive.
- UNO is the largest of a network of organizations which conducts group processing in the Chicago district UNO also is the head of several organizations that have created a consortium for this purpose. UNO is the only organization in the consortium allowed to contact the Chicago district office, so the office is not inundated with visits or phone calls from the other organizations. While this at times has created conflict among members of the consortium, INS in Chicago finds this system of contact to be best.
- Until recently waiting time on N-400s filed at the district office through UNO did not
 differ from those filed in person the processing time from start to finish was equal, as
 was the pass/fail ratio. However, with the increase in naturalization applications, the
 district office has noticed an increase in waiting time for applications filed by LPRs on
 their own.
- A total of 18 community groups in the Chicago area file applications through group processing. UNO is the largest, with the most hinds. There are several other organizations that would like to group file; however the Chicago District office is currently unable to service such requests. New entities wishing to group file are referred to UNO and asked to file applications through that organization. Several organizations do not like having to work though another group and have chosen not to do group processing. It must be noted that it is important that these organizations work with each other for the program to work. If they do not cooperate with each other, the program will fail.

Computer Program - St. Paul, Minnesota

In response to the overwhelming number of applications that the St. Paul office has been receipting in, along with a significant increase in the number of applicants scheduled to take the oath of allegiance, INS St Paul decided to create a computer program that would help alleviate some of the problems that were developing in the naturalization work load. Since St. Paul is not

on the NACS system, it was felt that a program to do the following was necessary.

- 1. Sends call-in notices for the oath-taking ceremony. (In St. Paul the courts have-maintained exclusive jurisdiction).
- 2. Prints out the naturalization certificate.
- 3. Prepares the country list that the courts require in this district.
- 4. Prepares the N-647 court order for the judge to sign.
- 5. Generates the coding that is required in naturalization cases.

Creation of the program began in late April 1995, and was completed by July. The program was used for the July and August hearings and changes were made to make the program more user friendly. The final version was completed in August, in time for a special naturalization ceremony that was held on September 1, 1995.

That ceremony, conducted during Citizenship Day at the Minnesota State Fair, naturalized 839 individuals. This was the largest ceremony ever held in the district. Organization of the ceremony, which included sending notices, printing certificates, typing the N-647 and arranging the ceremony was all completed in one month. The computer program created by the St. Paul office played a significant part in the success of the naturalization ceremony before the ceremony, with preparation of documents, and after the ceremony with the coding.

The program has organized the INS clerical staff into a more logical work program. The program allows for one set of key-strokes to complete all required documentation and there is less manual labor involved in preparing for ceremonies. Both the clerks and the officers who are involved in naturalization feel that not only has the program reduced the number of hours the employees spend on preparing for ceremonies, but it also has helped reduce the stress associated with the organization of a large ceremony and the number of mistakes made.

Same Day Swearing-in Ceremonies - Denver, Colorado

INS in Denver (DEN) is currently conducting naturalization interviews and oath-taking ceremonies on the same day. Because the federal courts have not retained exclusive jurisdiction in DEN, the following procedure is possible.

Every Thursday and Friday, between 7:30 AM. and 11:30 AM. 5 or 6 INS officers each conduct 16 naturalization interviews. If the naturalization applicant passes his or her interview/examination, he or she is ushered into a secondary waiting area where an INS clerk prepares the naturalization certificate, has the applicant sign the photos and certificate, and verify the information on the certificate. The clerk then issues a letter advising the applicant to return to the INS office for oath-taking ceremony at 3:00 P.M. that same day. Upon returning to the office, the applicant is sworn-in and receives the finished naturalization certificate.

If the applicant fails the written and/or history and government test, a new interview is-scheduled for a later date. Only when an applicant requests a name change is he or she scheduled for a judicial hearing. DEN conducts a judicial hearing once every other month. Usually there are only 30 to 35 individuals at a judicial ceremony.

DEN closes their office to the public at 2:30 P.M. to prepare for the ceremony which takes place in the INS public waiting room. To maintain the formality and integrity of the swearing-in ceremony, the Denver office has cleaned up the public waiting room by painting the walls, purchasing new chairs, and replacing old, stained carpet with tiles. New bulletin boards were put to replace the INS posters that were taped to the walls and new flags where hung. The district is also working with one of the local school districts to have students paint a mural on the walls.

For the Denver district officer, there are many benefits to this program.

- INS officers like the program because they have the afternoons to conduct other business.
- The public and AILA like it because there is only one wait period, the one for the interview.
- While the judges were reluctant to allow administrative hearings, they are now in fill support of the program. INS in Denver first convinced the judges to try a pilot program to see how the program worked. It worked so well that the judges are now reluctant to do any ceremonies. In fact, the judges have proposed that, even with name changes, the INS conduct the ceremony and the judges will sign the name change certificates.
- For special ceremonies, such as ceremonies for children, the press also seems pleased with the program.
- For the month of April, INS Denver is planning a special project to clean up their naturalization backlog of 3,400 cases. They plan on conducting naturalization interviews Mondays through Fridays. They will utilize all available officers to interview in the mornings and conduct the ceremony in the afternoon. With this program, if there are 10 officers interviewing, it is possible to naturalize 160 applicants a day, for a total of 3,200 new citizens.
- By conducting only naturalization interviews during any given month, the backlog of
 other applications is growing. However, once the naturalization backlog is made current,
 the district feels that it will not be difficult to get the backlog of other applications
 current.
- This program will only work in areas where judges do not elect to retain exclusive jurisdiction