



# Changes to the Naturalization Process

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## Key takeaways:

- In August and September 2025, USCIS issued announcements related to enhancing scrutiny and expanding investigative measures in naturalization cases. These announcements refer to plans including:
- Reinstatement of the 2020 Naturalization Civics Test with modifications, creating a more rigorous exam that may include a written essay on topics such as the meaning of citizenship or reflections on historical figures
- Reliance on a holistic approach to evaluate whether applicants meet the standard for “good moral character,” considering both positive and negative behavior and not limited to criminal records
- Restoration of authority to perform neighborhood checks to ascertain information from applicants’ neighbors, colleagues, and family members

## Proposed Changes to the U.S. Citizenship Process

September 17 marks Citizenship and Constitution Day, a time to reflect on the principles that shaped our nation and the role they continue to play in our lives. The Constitution provides the framework of our democracy and secures the rights and responsibilities we share as Americans. For immigrants, the step of becoming a U.S. citizen is not only a legal milestone, but also a meaningful affirmation of belonging and commitment to these shared values. Observing this day reminds us that citizenship is both a privilege and a responsibility that strengthens the fabric of our communities and our democracy.

Today, U.S. Citizenship and Immigration Services posted a Federal Register notice announcing implementation of a new naturalization civics test that may alter the path and accessibility to citizenship. In connection with other recent USCIS announcements, it is reasonable to expect expanded vetting measures in naturalization cases as demonstrated by:

- A redesigned, more rigorous civics test;
- An expansive approach to evaluating “good moral character;” and,
- The possibility of interviewing applicants’ neighbors and coworkers in cases where fraud is suspected.

## Updates to the Naturalization Civics Test

Currently, U.S. Citizenship and Immigration Services (USCIS) officers administer the civics test by selecting ten questions from a list of 100, with applicants required to answer at least six correctly to pass. New USCIS leadership has indicated this structure may not sufficiently demonstrate applicants’ civic understanding. Under the proposed revisions,



the test may include higher passing requirements and a written essay component, with potential topics ranging from the meaning of American citizenship to reflections on historical figures. These changes would represent a shift from primarily memorization-based questions toward an assessment of civic knowledge and personal perspectives.

## Expanded Investigative Measures

USCIS, long seen as a service-focused agency, has announced plans to expand its enforcement role in administering citizenship. Proposed changes include a broader interpretation of “good moral character,” reinstating neighborhood interviews, and creating a new division of special agents to investigate fraud. Recent guidance directs officers to weigh factors like steady work, community service, tax compliance, and family responsibilities. While the shift highlights civic engagement and personal responsibility, advocates worry the subjective standard could lead to inconsistent results. For applicants, the message is clear: it’s more important than ever to present a full picture that reflects both legal compliance and meaningful community contributions.

## Good Moral Character Evaluation

USCIS will rely on a holistic approach to evaluate whether applicants meet the Good Moral Character (GMC) standard. This means officers will consider both positive and negative factors, rather than limiting the GMC inquiry to review of criminal records. The following considerations will be weighed in assessments of GMC under the evaluation:

- **Community Involvement:** Participation in volunteer work, civic engagement, or efforts to support others in the community.
- **Family Responsibility:** Providing care for children, elderly family members, or maintaining a stable and supportive household.
- **Education and Personal Growth:** Earning degrees, certifications, or pursuing job training and self-improvement opportunities.
- **Employment Record:** Demonstrating consistent, lawful employment and financial self-sufficiency.
- **Financial Responsibility:** Paying taxes in full and on time and managing finances responsibly.
- **Behavior and Conduct:** Repeated traffic violations, DUIs, or other reckless actions may negatively impact your application.

## What can affect your Good Moral Character?

USCIS' recent guidance also highlights specific behaviors that can negatively impact a Good Moral Character determination, including:

- Multiple DUIs or drug-related offenses
- Unpaid child support or overdue taxes
- Repeated traffic violations, even if not criminal
- Aggressive or overly pushy solicitation practices



- Any evidence of dishonesty or fraud

Importantly, even if these issues occurred years ago, UCSIS officers are now directed to take a broader, long-term view of an applicant's life and behavior.

## Possibility of Neighborhood Investigations

In connection with the expanded understanding of GMC, USCIS also recently announced restoration of statutory authority for neighborhood or vicinity investigations in certain naturalization cases, reviving a practice that had largely fallen out of use since the early 1990s. Under this policy, immigration officers may interview neighbors, colleagues, or others in an applicant's community to verify residency, assess character, and confirm attachment to the principles of the Constitution. While the measure is framed as a way to reinforce the integrity of the citizenship process, it also raises significant concerns. For some applicants, particularly those without deep community ties or who are wary of intrusion, neighborhood checks may create unnecessary hurdles, prolong adjudications, and invite the risk of bias. The return of this investigative tool marks a noteworthy shift in the naturalization landscape, one that practitioners and applicants alike will need to watch closely.

## Support and Concerns

These policy changes go beyond routine updates; they could fundamentally change the way in which U.S. citizenship cases are adjudicated. While agency officials have characterized these changes as part of an effort to protect the integrity of the naturalization process that will promote accountability and help ensure citizenship is granted only to qualified applicants, immigrant advocates and civil rights organizations have expressed concerns that the new requirements could create additional hurdles, discourage eligible individuals from applying, and increase uncertainty for applicants navigating the process.

Applicants with straightforward, clean records will likely continue to succeed. However, those with minor past issues, such as traffic violations or delayed taxes, may face increased scrutiny. Naturalization applications may take longer to adjudicate and could become more costly due to additional documentation requirements and background investigations. In addition, some legal experts predict future lawsuits challenging the ambiguity of these new standards. For now, applicants should prepare for a more rigorous and subjective review process.

## Preparing for Naturalization

For individuals considering U.S. citizenship, these potential changes highlight the importance of thorough preparation. Applicants may wish to dedicate additional time to studying civics, practicing written responses, and maintaining clear documentation of community and professional ties. Those seeking clarity about how the proposed policies



might affect their case may benefit from consulting with an experienced immigration professional on our team at GYH. If you are thinking about naturalizing, it makes sense to:

- **Gather Strong Character References:**  
Obtain letters from employers, coworkers, neighbors, community leaders, or faith-based organizations that highlight your positive contributions and responsible conduct.
- **Document Volunteer Activities:**  
Keep records of your volunteer work, including confirmation letters, photos from events, or logs of service hours.
- **Organize Financial Records:**  
Ensure all tax filings are up to date and paid. If you've had back taxes, keep documentation showing full repayment or active payment plans.
- **Show Family and Community Connections:**  
Provide evidence of family support, such as caregiving for children or relatives, and active involvement in your community.
- **Consult an Immigration Attorney:** Given the broader and more subjective evaluation standards, a legal review of your background with a GYH attorney can help identify and address any potential concerns before you apply.

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