

TESOL International Association
1925 Ballenger Avenue
Suite 550
Alexandria, VA 22314

9 December 2020

Mr. Kenneth Cuccinelli
Senior Official Performing the Duties of Director
United States Department of Homeland Security
U.S. Citizenship and Immigration Services
2707 Martin Luther King Jr. Avenue, SE
Washington, DC 20528

RE: Civics Educational Requirement for Purposes of Naturalization

Dear Mr. Cuccinelli:

On behalf of TESOL International Association, a world leader in advocating for English language teachers and learners, I am writing to express our significant concerns regarding the recent revisions to the United States Civics Education exam.

Amongst our greatest concerns are the increased length and difficulty of the new exam. The new test includes a pool of 128 potential questions, a significant increase from a pool of 100 questions. Applicants now would have to answer 12 out of 20 questions correctly in order to pass, double the amount needed under the previous version of the exam. Not only does this new requirement needlessly increase the difficulty of the exam, but the increased amount of time the exam will take to complete has the potential to decrease the number of tests that can be administered, thereby limiting the number of applicants who can obtain U.S. citizenship. Even if this effect is unintentional, it runs counter to the mission of the United States Citizenship and Customs Services, and it is within the department's control to change.

TESOL is also concerned about the phrasing of several questions that are extremely flawed and appear to be ideologically biased. For example, the answer to the question "Who does a senator represent?" has been changed from "all the people of the state," to "citizens of their state." This statement is factually wrong. Nowhere in the United States Constitution does it state that senators represent only citizens of their respective states. TESOL recommends that the answer to this question remain "all the people of the state."

While past iterations of the civic education exam were created with transparency, field testing, and opportunities for continuous feedback from stakeholders and outside experts, the newly

revised version seemingly lacks the same levels of transparency, field testing, and stakeholder input.

In view of these concerns, TESOL strongly recommends that USCIS continue to use the 2008 test until a full and transparent process of field testing and stakeholder review can be completed for the new test, as it has been for the previous ones.

Thank you for the opportunity to offer our comments and feedback regarding the revised citizenship exam. We look forward to the department's thoughtful consideration of our recommendations and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rosa Aronson', with a horizontal line drawn through the middle of the signature.

Rosa Aronson
Interim Executive Director
TESOL International Association