

USCIS STAKEHOLDER ENGAGEMENT - JANUARY 12, 2023, 2-3PM

Questions and Answers

The following questions and answers pertain to the first public engagement on the naturalization test redesign trial tests that was held virtually on January 12, 2023. The engagement focused solely on the trial testing we will be conducting for a five-month period in 2023. Participation in the trial will not affect any naturalization application that may be submitted to USCIS during the trial testing period or any time thereafter. USCIS may use the results to support future changes to the naturalization test. USCIS is not able to answer questions about future changes to the naturalization test at this time.

Test Redesign Process Questions

- 1. In the previous test revision process that led to the current version of the test (the one that was implemented in 2009), USCIS assured stakeholders that the new test would not decrease the pass rate and kept that promise. USCIS piloted the test several times before finalizing it, and after implementation they released a detailed records study of the pass/fail rates in 2011 that demonstrated no decrease in the pass rate. Will USCIS provide stakeholders with the same assurance this time, that this revision will not decrease the pass rate?
 - There was a question asked that revision will not decrease the pass rate. A similar concern is that it also should not increase the pass rate either. Is that being assured?
 - This engagement is for the trial testing of the new proposed speaking and civics test. We will be collecting data from the trial test and will review internally and through the external technical advisory group (TAG).
- 2. How will USCIS ensure that the trial sites and individuals are representative of all applicants (reflecting the full regional, national origin, age and linguistic skill diversity of lawful permanent residents throughout the nation) so that the new civics and speaking tests do not have a negative impact on pass rates for certain groups of applicants?
 - We plan to administer the trial testing through a virtual link. This allows organizations from across the country to participate. We encourage community-based organizations who serve diverse populations to volunteer for the trial test. The requirements for community-based organizations (CBOs) to volunteer are to:
 - Be a nonprofit with 501(c)(3) status;
 - Be conducting adult education classes during the trial test period; and
 - Incorporate trial test educational materials provided by the Office of Citizenship in their curriculum.

- 3. Why is the trial process based on volunteer? Did USCIS explore the possibility of creating grants for organizations that participate?
 - Relying on volunteer CBOs expands access to participating in the trial test to large and small organizations. This helps foster a diverse population of test takers from across the nation. USCIS did not explore grants for participating organizations.
- 4. Will it be possible for CBOs whose citizenship classes are online to participate in the trial?
 - Yes, we encourage CBOs whose classes are online to participate in the trial tests.
- 5. Please clarify if high school districts and community colleges that offer adult ESL and citizenship preparation classes are eligible to participate in the trial.
 - Yes, we welcome any organization that satisfies the 3 criteria listed below to participate. Adult ESL and citizenship education providers in a variety of settings may express interest in volunteering for the trial tests by emailing natzredesign22@uscis.dhs.gov.

The requirements for community-based organizations (CBOs) to volunteer are to:

- Be a nonprofit with 501(c)(3) status;
- Be conducting adult education classes during the trial test period; and
- Incorporate trial test educational materials provided by the Office of Citizenship in their curriculum.
- 6. Should I enroll to a CBO organization's classes to take the trial test? Would there be an option for volunteer applicant to participate in this trial?
 - Individuals can provide feedback through the mailbox <u>natzredesign22@uscis.dhs.gov</u>. The trial testing will be for adult students enrolled in CBOs that volunteer to participate in the trial tests.
- 7. What is the basis for the change to a multiple-choice format for the civics test and a photo-based format for the speaking test?
 - We are conducting and developing the trial test to align with best practices in the field of test development and to further standardize the naturalization test.
- 8. How will USCIS address challenges with the picture test format, such as vision problems (i.e., color blindness) or cultural differences in perceptions?
 - USCIS will seek recommendations from the TAG and use data from the trial test to create a fair and standardized test for all test takers.
- 9. Will there be audio available in addition to written questions for the civics test? If so, will the written answer options be available as audio, too? (If not, this will be a test of reading skills in addition to civics knowledge, applicants would not need a separate reading test.)
 - During the trial test there will not be an audio feature for the civics test. The trial test will be a multiple-choice test, and volunteer test takers will select an answer choice.

- 10. USCIS is now taking comments about the trial program. Will it make public its final assessment of the trial program? Will it provide any kind of formal process for stakeholder input and comment about any potential changes to the tests after the trial program is completed?
 - USCIS will be announcing a contract to facilitate a TAG of external subject matter experts in the field of English language acquisition, civics and history, and test development. The TAG will analyze trial test data and compile reports on the trial test. Any changes to the naturalization test after the trial test will announced by a Federal Register Notice for comments.
- 11. Once USCIS publishes the revised test in the Federal Register, will stakeholders have an opportunity to provide comments before it is finalized?
 - USCIS welcomes input from stakeholders on our Federal Register Notices and will take them into consideration.
- 12. The current test was aimed at a National Reporting System (NRS) high beginning proficiency level. Is this new test targeting the same level?
 - The speaking and civics trial tests are aligned to NRS ESL Level 3 High Beginner. The TAG will review the language on the speaking and civics trial tests to ensure alignment to NRS Level 3.
- 13. Participating in the testing trial while simultaneously preparing students for the current USCIS tests will be a significant undertaking for many adult ed programs and may also confuse students. Please provide more details about the CBOs' workload, time commitment, other expectations, and the specific dates their roles will begin and end.
 - We understand the workload and appreciate the time and efforts of educators and volunteers in the world of adult education. We'll be providing more information on the time commitments in the next engagement.
- 14. What specific accommodations are planned for applicants who are not able to use the tablet interface, e.g., elderly applicants not familiar with technology, etc.?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself. For the trial tests, the teacher will be in the room with the volunteer test taker to help with any technology use.
- 15. How will the study guide be updated to reflect the redesign? Will multiple choice options be provided in advance? Will photos be published in advance?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself. We will provide study materials for volunteer CBOs to use with their students to prepare for the trial tests. We will conduct a virtual training for staff at volunteer CBOs to address preparing their students for the trial tests.
- 16. Eva Millona indicated input will be gathered from volunteer agencies for trial testing. Many of the migrants served in these agencies are undocumented. Why aren't public programs with a majority of documented immigrants not being used as test sites?
 - USCIS will not be collecting the immigration status or other personally identifiable information from volunteer test takers. Programs that provide ESL and/or adult citizenship education services

to adult immigrants can email us at <u>natzredesign22@uscis.dhs.gov</u> to request more information on volunteering for the trial test.

17. Will this test be administered on paper or by computer?

• The trial test will be administered through a weblink on a computer with the teacher in the room to facilitate and answer any questions.

18. As educators, are we expected to teach the trial questions/content to the students in advance of them taking the trial test? Or is the test a one-time trial to get sample data results?

• We will provide study materials for volunteer CBOs to use with their students to prepare for the trial tests. We will conduct a virtual training for staff at volunteer CBOs to address preparing their students for the trial tests.

19. How are CBOs selected?

• Programs that provide ESL and/or adult citizenship education services to adult immigrants can email us at natzredesign22@uscis.dhs.gov to request more information on volunteering for the trial test.

The requirements for CBOs to volunteer are to:

- Be a nonprofit with 501(c)3 status;
- Be conducting adult education classes during the trial test period; and
- Incorporate trial test educational materials provided by the Office of Citizenship in their curriculum.

The Office of Citizenship will then select CBOs based on program size, geographic region, and population served.

20. Is there a minimum number of students for a program to participate in trial?

• No, we encourage programs of all sizes to express interest in volunteering by emailing natzredesign22@uscis.dhs.gov.

21. If our ESOL program is not funded by the state departments of education, would our students be eligible to participate in the trial?

• Yes. Funding from a state department of education is not required.

The requirements for CBOs to volunteer are to:

- Be a nonprofit with 501(c)(3) status;
- Be conducting adult education classes during the trial test period; and
- Incorporate trial test educational materials provided by the Office of Citizenship in their curriculum.

22. For the test, how will you test the redesign for accessibility and for those needing accommodations?

• We will seek recommendations from the TAG on various accommodations.

Trial Civics Test Questions

- 1. Will the possible responses have subtle differences, or will the correct response be somewhat obvious to someone who has studied the material?
 - Each multiple-choice civics test question for the trial test will have one clear and identifiable correct answer, and three incorrect answer choices.
- 2. Is there any relationship between the new civics test and the Assessment of Adult Citizenship Education (AACE)?
 - There is no relation between the civics trial test and the Assessment of Adult Citizenship Education (AACE).
- 3. Will applicants still need to respond correctly to six out of ten questions in order to pass?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself. The civics trial test is not a pass/fail test.
- 4. Will there be a time limit for responding to questions?
 - During the civics trial test there will be no time limit to answer the questions.
- 5. Will scores be immediately available to applicants?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself. During the trial test the volunteer test takers will not receive a score.
- 6. How will USCIS administer the trial civics test to applicants who qualify for the English exemption based on age and long-term residence?
 - The trial test will be administered in English only.
- 7. Will there be an option to listen to and answer the civics questions orally rather in a multiple-choice written format?
 - During the trial test there will not be an audio feature for the civics test. The trial test will be a multiple-choice test and volunteer test takers will select an answer choice.
- 8. Will Juneteenth or other African American history besides MLK be included in new civics content? Will any Latinx-American history be included in the new civics content?
 - We are not yet able to provide any information on the content of the trial civics test. The test content is currently being developed by USCIS subject matter experts (SMEs) and will be reviewed by external SMEs in the TAG.
- 9. Will the proposed Civics test be reading based or delivered orally? Will the multiple-choice test be administered in written format or orally?
 - The civics trial test will be a written multiple-choice test. Volunteer test takers will take the test by reading the question from a tablet or computer screen and then selecting an answer on screen.

10. Will the civics test for applicants permitted to take the simplified version (65/20 exemption) also be converted to multiple choice format as part of this test redesign?

Any changes to the 65/20 Special Consideration? Any chance that the age for consideration could be brought down to 55?

Do you plan to remove the other two language exceptions? 50/20 and 55/15

- For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself. We are not making any changes to the age or time as a lawful permanent resident exemptions or special consideration as part of this trial test.
- 11. What specific accommodations are planned for the multiple-choice civics test for applicants with visual impairments, e.g., will the tablet be able to accommodate large print version of questions, will officer or representative be permitted to read the questions to the applicant?
 - We will seek recommendations from the TAG on various accommodations.
- 12. What is the reason for revising the topics of the civics test questions at this time?
 - We are conducting and developing the trial test to align with best practices in the field of test development and to further standardize the naturalization test. Content on most tests is reviewed periodically. The test content is currently being developed by USCIS subject matter experts (SMEs) and will be reviewed by external SMEs in the TAG.
- 13. What is the purpose or rationale behind the change from oral questions to multiple choice for the civics test?
 - We are conducting and developing the trial test to align with best practices in the field of test development and to further standardize the naturalization test.

Trial Speaking Test Questions

1. Will the approximately 40 images in the final item bank (and the 70 images in the pilot test item bank) be available as study materials?

Will the teachers have the pictures used for the speaking portion to use in class to help develop vocabulary?

How will students study for the English test. Right now, students get a list of words to learn for the writing test. Will they get a list of phrases to go with the pictures. Will they have copies of the pictures ahead of time?

- We will provide study materials for volunteer community-based organizations (CBOs) to use with their students to prepare for the trial tests. We will conduct a virtual training for staff at volunteer CBOs to address preparing their students for the trial tests.
- 2. Will the picture prompts be of a general ESL nature or related to Civics topics/Civics questions?
 - The content areas for the types of photographs that would be used during the trial speaking test have been derived from topics and situations an English language learner may encounter in everyday life.

3. What type of scoring guidelines will be used to assess spoken responses?

• We are currently creating scoring guidelines for the trial speaking test. The scoring guidelines for the trial test will be reviewed by the TAG.

4. Will spoken responses be assessed only in regard to use of relevant vocabulary and "simple phrases?" Or will pronunciation, grammar/syntax, or fluency also be rated?

• We are currently creating scoring guidelines for the trial speaking test. The scoring guidelines for the trial test will be reviewed by the TAG.

5. Will speaking prompts be repeated or rephrased if the applicant requests it?

• The teachers at volunteer community-based organizations will administer the trial test and may repeat and rephrase prompts.

6. Will applicants' responses be recorded?

• For the trial test the volunteer test taker's responses will be recorded.

7. Will scores be immediately available to applicants?

• For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself. During the trial test the volunteer test takers will not receive a score.

8. What specific accommodations for the English-speaking test trial are planned for applicants with visual impairments?

• We will work with CBOs on accommodations for individual students. USCIS will also seek recommendations from the TAG.

9. Is proper grammar necessary for picture responses? When describing a picture, do the sentences have to be 100% grammatically correct.

• We are currently creating scoring guidelines for the trial speaking test. The scoring guidelines for the trial test will be reviewed by the TAG.

10. Is a single sentence that describes the photo considered one response or is the applicant expected to describe the photo in a certain number of sentences?

Is there a word minimum expected for responses to the photo prompts?

• We are currently creating scoring guidelines for the trial speaking test. The scoring guidelines for the trial test will be reviewed by the TAG.

11. Will there be a control group of English native speakers also taking the trial test? Many individuals speak English, but they are not citizens but want to be.

• For the purpose of the trial test, we will not be having a group of volunteer native English speakers.

Technical Advisory Group Questions

- 1. Will the language acquisition specialists in the TAG have input on test development/item selection before the trial phase, or will they only be involved in reviewing data after the trial, i.e. to finalize the test bank?
 - The TAG will be involved with reviewing and making recommendations on the draft speaking and civics trial test items before and after the trial test.
- 2. Will the TAG have input on the phrasing of the civics questions/answer options, speaking test prompts, and test procedures (e.g., instructions and scoring)?
 - The TAG will be involved with reviewing and making recommendations on the draft speaking and civics trial test items before and after the trial test.
- 3. Who will select the TAG members and on what basis will they be selected? How can a person join the TAG?
 - The vendor who is awarded the contract will select the TAG members.
- 4. Will black and latinx historians be consulted in creating new civics content?
 - The vendor who is awarded the contract will select the TAG members.
- 5. Will TAG recommendations be part of the public record?
 - Yes. The TAG will analyze trial test data and compile reports on the trial test. Any changes to the naturalization test after the trial test will announced by a Federal Register Notice for comments.

Implementation Questions

- 1. How many speaking test items are you thinking of? One of the considerations in the 2008 iteration of the test was how long a separate speaking test would make the whole process. What has changed?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.
- 2. Once the test is finalized, will USCIS release:

the 40 selected images?

a list of specific topics that students need to be familiar with?

test prompts, or sample prompts?

model responses?

the scoring guidelines/rubric?

any other materials that can be provided to applicants or to ELL and civics educators to help with test preparation?

• For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.

- 3. What kind of training will be conducted with adjudicators to ensure that they administer the new test uniformly and fairly?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.
- 4. Will adjudicators continue to administer and score the speaking test as part of the interview?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.
- 5. How does USCIS plan to provide due consideration on the new civics test, in keeping with 8 CFR § 312.2 (c) (2)?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.
- 6. Will the civics test continue to consist of a bank of 100 publicly available questions?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.
- 7. At what point in the citizenship application process will the multiple-choice civics test be administered? Will adjudicators continue to administer this test as part of the interview?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.
- 8. When will the new test be implemented?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.
- 9. Since applicants will no longer be tested on speaking as part of the review of their N-400 applications, will interpreters be allowed to assist in the interview?
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.
- 10. How much time will educators have between the announcement of the final test content and national implementation of the new test? Time is needed to retrain teachers and develop materials in response to the new content and format as well as for textbook writers and publishers to revise their publications.
 - For purposes of this engagement, our responses will be focused on inquiries specific to the trial test itself.