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Standardizing the Fee Waiver Application Increased Naturalization Rates of Low-Income Immigrants*

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Abstract

Citizenship can accelerate immigrant integration and result in benefits for both local communities and the foreign-born themselves. Yet the majority of naturalization-eligible immigrants in the United States do not apply for citizenship, and we lack systematic evidence on policies specifically designed to encourage take-up. In this study we analyze the impact of the standardization of the fee waiver process in 2010 by the United States Citizenship and Immigration Service (USCIS). This reform allowed low-income immigrants eligible for citizenship to use a standardized form to have their application fee waived. We employ a difference-in-differences methodology, comparing naturalization behavior among eligible and ineligible immigrants before and after the policy change. We find that the fee waiver reform increased the citizenship rate by 1.5 percentage points. This amounts to about 73,000 immigrants per year gaining citizenship who otherwise would not have applied. In contrast to previous research on the take-up of federal benefits programs, we find that the positive effect of the fee waiver reform was concentrated among the subgroups of immigrants with lower incomes, language skills, and education levels, who typically face the steepest barriers to naturalization. Further evidence suggests that this pattern is driven by immigration service providers, who are well-positioned to help the most needy immigrants file their fee waiver requests.

Keywords: citizenship, naturalization, immigration, integration, take-up

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1 Introduction

As the size of the foreign-born population in the United States has reached record-high levels, research has examined the value of citizenship for immigrants [National Academies of Sciences, Engineering, and Medicine (2016)]. Citizenship grants them the right to vote, ease of travel, eligibility for certain jobs, and protection from deportation. Acquiring host country citizenship is also associated with increased wages and better employment for immigrants, as well as higher levels of social and political integration [Bratsberg et al. (2002); Hainmueller et al. (2017, 2015); Bevelander et al. (2008); Pastor and Scoggins (December 2012); OECD (2011)]. Naturalization can also benefit the communities in which they reside [National Academies of Sciences, Engineering, and Medicine (2016); Pastor and Scoggins (December 2012); Enchautegui and Giannarelli (December 2015)].

When surveyed, most immigrants in the United States express the desire to become citizens [National Academies of Sciences, Engineering, and Medicine (2016); Gonzalez-Barrera et al. (2013)]. Yet naturalization rates in the United States are considerably lower than in other traditional destination countries, such as Canada or Australia [National Academies of Sciences, Engineering, and Medicine (2016); Liebig et al. (2011)]. In fact, there are currently over nine million eligible lawful permanent residents (LPRs) who have not taken advantage of their opportunity to become citizens [Gonzalez-Barrera and Krogstad (2018)]. This puzzling pattern raises the question as to what barriers might hold back LPRs from naturalizing.

Previous research has revealed a variety of potential barriers. These include lack of motivation or information, insufficient language ability, and difficulty navigating the administrative system [National Academies of Sciences, Engineering, and Medicine (2016); Ramirez and Medina (2010); Pastor et al. (2013)]. A more recent barrier is the application fee, which has risen from \$35 in the late 1980s to \$725 today, as shown in Figure 1 [National Academies of Sciences, Engineering, and Medicine (2016); Liebig et al. (2011)]. However, there is a paucity of research on the implications of rising fees for suppressing applications by eligible, desirous, but financially strapped LPRs. [Hainmueller et al. (2018)] found that citizenship application rates among low-income LPRs doubled when they were awarded a voucher that paid the application fee. [Hotard et al. (2019)] showed that the naturalization rate among very low-income LPRs increased by 30 percent when they were informed of their eligibility for a federal fee waiver. These studies suggest that the current application fees and lack of information about available options to waive them are active barriers for low-income LPRs in the naturalization process, contributing to low naturalization rates in the United States.

In this study we build on this literature on overcoming barriers to citizenship and evaluate the impact of a recent, as yet unexamined, federal policy intervention: changes simplifying the application process for the federal fee waiver for naturalization applications by the United States Citizenship and Immigration Service (USCIS). Whereas the previous studies tested active interventions in a local context (fee vouchers and an information nudge using experiments embedded in a state-wide naturalization program in New York), our paper focuses on the nationwide effects of a federal policy change.

Before 2010, low-income immigrants could petition USCIS for a fee waiver associated with a number of

immigration forms (including naturalization applications) by demonstrating their inability to pay the application fee. This required an affidavit or unsworn declaration. USCIS officers had wide discretion in evaluating the applicant's inability to pay. There was no standardized application form for a fee waiver request, and only vague internal guidance about which requests should be approved [Yates \(2004\)](#). In November 2010, USCIS instituted a standardized fee waiver process with a simple form (I-912) to accompany the basic application form (N-400) with clear rules for eligibility to streamline the review of fee waiver requests. Under the new rules, immigrants could apply for the fee waiver if their household income was less than 150% of the federal poverty guidelines or if they received means-tested benefits (such as the Supplemental Nutrition Assistance Program (SNAP) or Medicaid) [U.S. Citizenship and Immigration Services \(2010\)](#). With this administrative change, USCIS simplified its processing of naturalization applications: LPRs who were ineligible for the fee waiver paid the regular price (\$680 in 2010) while very low-income LPRs could apply for free by filling out the newly created I-912 form.

To date, over 1,000,000 LPRs have used the new I-912 fee waiver form [United States. Department of Homeland Security \(2017\)](#). Given its widespread use, there is an opportunity to examine the impact of the standardization of the fee waiver on the naturalization rate of low-income LPRs.

What effects might we expect to find from the fee waiver standardization? Generally, one might expect that the reform would increase naturalization rates among eligible LPRs. The standardization makes it easier to access the fee waiver and could thereby enable more low-income immigrants to naturalize who could not otherwise afford the application fee. This would be consistent with previous research showing that the current application fee is a barrier to naturalization [Hainmueller et al. \(2018\)](#); [Pastor et al. \(2013\)](#).

The question is whether standardization helps those facing the steepest barriers in accessing public benefits. Indeed, one might also expect significant heterogeneity in the impact of the fee waiver reform. It might do little to enable the poorest of those eligible to naturalize given that they typically face the steepest barriers to accessing public benefits. For instance, the literature provides examples where expansions of public benefit programs or interventions to make benefits easier to access were less beneficial to those who need them the most. [Card et al. \(2008\)](#) find that at the onset of Medicare eligibility at age 65, the increase in the use of expensive medical procedures is higher among previously insured groups. Similarly, in their study of SNAP, [Finkelstein and Notowidigdo \(2018\)](#) find that in response to an intervention designed to increase participation by the poor, healthier, white English speakers dominated the field of new applicants. These results are consistent with work in behavioral economics [Mullainathan and Shafir \(2013\)](#) focusing on the "bandwidth tax" imposed on the very poor in the form of complicated application processes. They are also consistent with a political economy perspective [Pierson \(1994\)](#); [Stockman \(2013\)](#) that posits the political survival of a welfare program only if the wealthiest of the targeted group receive benefits, as they are a key voting block.

Apart from enabling more immigrants to apply for naturalization, another potential effect of the fee waiver reform is substitution. Substitution occurs when immigrants who would naturalize even in the absence of

the reform are induced to use the fee waiver rather than pay the application fee. In this case, USCIS would face forgone revenues without increasing naturalization rates. Similar substitution effects, often called “crowd-out”, have been observed in the context of various public benefits expansions such as health insurance [Cutler and Gruber \(1996\)](#); [Dubay and Kenney \(1997\)](#); [Kronick and Gilmer \(2002\)](#); [Gruber and Simon \(2008\)](#); [Gresenz et al. \(2012\)](#), cash payments [Albarraan and Attanasio \(2002\)](#), and childcare [Bassok et al. \(2014\)](#).

In this study, we examine these theoretical predictions and ask three questions. First, did the fee waiver reform increase naturalization rates? Second, are these effects weaker or stronger for the neediest? And third, to what degree did it lead to substitution?

Providing evidence on these effects is important for two reasons. First, the reform had the potential to affect millions of immigrants eligible for citizenship in the United States. Second, it can inform ongoing debates about policies governing immigration fees in the United States. In 2016, a partial fee waiver was introduced specifically for naturalization applicants, which allows someone who has a household income between 150% and 200% of the federal poverty guidelines to pay half the normal naturalization fee [U.S. Citizenship and Immigration Services \(2016a\)](#). In 2018, USCIS proposed changes to the fee waiver form and new standards for how it will determine eligibility for the program. In the proposed changes, receipt of a means-tested benefit will no longer serve as a justification for a fee waiver, and applicants will have to submit a tax transcript rather than a tax return to prove that their income falls below the required threshold [U.S. Citizenship and Immigration Services \(2018a,b\)](#). Our analysis of the policy initiative of 2010 should inform public scrutiny of the 2018 proposal.

2 Data

To examine the effects of the reform of the fee waiver program, we use data from the American Community Survey (ACS) from 2007 through 2016. To limit the sample to low-income LPRs who are likely eligible for citizenship, we focus on foreign-born respondents age 18-65 who have been living in the United States for more than six years (or more than four years if married to a citizen) and less than 40 years, and with a household income less than or equal to 300 percent of the federal poverty guidelines. The ACS does not contain information on legal status, so following [Amuedo-Dorantes and Bansak \(2012\)](#) we also exclude Mexicans with high school or lower education level who constitute the largest undocumented immigrant group, and therefore ineligible for citizenship [Passel and Cohn \(2009\)](#). For similar reasons, we also exclude immigrants who are likely on student visas, those residing in group quarters, and veterans. We then divide this sub-sample into a treatment and control group based on their eligibility for the standardized federal fee waiver. Specifically, respondents with household incomes of less than or equal to 150 percent of the federal poverty guidelines and those who receive means-tested benefits were considered eligible for the fee waiver and placed into our treatment group. LPRs who did not meet either of those criteria were ineligible and hence placed into the control group. Because the policy change occurred in late 2010 and the application

process to naturalize can take up to a year after an application is submitted, we stipulate 2012 as the first year under the treatment regime.

Further details about the sample and descriptive statistics are reported in the Supplementary Information (SI). Replication files are available at doi.org/10.7910/DVN/PEETCY. By design, the control group had higher incomes and were half as likely to be unemployed compared to the treatment group. Nevertheless, the two groups were well balanced on other demographic characteristics. For instance, average age, racial composition, average years of residency in the United States, and proportion reporting that they spoke English at home were virtually identical between treatment and control.

3 Empirical Strategy

Our primary identification strategy is based on a difference-in-differences framework comparing naturalization rates for eligible (treatment) and ineligible (control) immigrants before and after the changes to the fee waiver program came into effect in 2012. In particular, we estimate the following fixed effects regression:

$$y_{ist} = \alpha + \beta_1 Treatment_{ist} + \beta_2 Post_t + \beta_3 Treatment_{ist} \times Post_t + \beta_4 X_{ist} + \beta_5 W_{st} + \gamma_s + \sigma_t + \epsilon_{ist}$$

In this equation, y_{ist} is the outcome coded as one if immigrant i from state s is naturalized in year t and zero otherwise, $Treatment_{ist}$ is a treatment group indicator, and $Post_t$ denotes 2012 or later years. The vector X_{ist} includes controls for personal characteristics (gender, race, age, age squared, education, area of origin, residency, residency squared, residing in a metropolitan area, indicators for being married and married to a citizen, whether the respondent speaks English at home, wage and labor force status), and W_{st} similarly includes state-level controls (unemployment rate, average wages, and state-specific linear time trends). Next, γ_s denotes state fixed effects, which control for permanent differences in naturalization rates across localities. We also control for year fixed effects (σ_t) accounting for aggregate fluctuations common to all LPRs, such as the effect of changes in N-400 fees or the mobilizing effect of federal elections. Lastly, α is the intercept and ϵ_{ist} is the error term.

The coefficient of interest is β_3 , which identifies the average treatment effect on the treated, meaning the average difference in the naturalization rate in the treatment group relative to the control group due to the fee waiver standardization after accounting for an array of personal and state-level characteristics. The identification assumption states that, in the absence of the standardization of the fee waiver program, naturalization behavior across our treatment and control groups would have followed parallel trajectories. We provide evidence supporting this parallel trends assumptions by examining naturalization trends prior to 2012. Specifically, we interact the treatment group variable ($Treatment_{ist}$) with indicators for each year.

Similar trends prior to the policy are consistent with small and statistically insignificant values for the interactions before 2012.

4 Results

4.1 Effects on Naturalization Rate

Figure 2 displays the main results from the difference-in-differences regressions. For each year before and after the fee waiver standardization, it shows the estimated coefficient of the interaction term of the treatment group dummy and year indicator. There are two main findings. First, naturalization rates increase at different rates for the eligible (treatment) group compared to the ineligible (control) group following the changes to the fee waiver program. When averaging over the three-year period before (2009-2011) and after (2012-2014) the reform, the results suggest that the fee waiver standardization increased the naturalization rate in treatment relative to control by about 1.5 percentage points (95% CI 1.1 to 2; see "SI Appendix, Tab. S2" for details and alternate time windows).

Second, consistent with the parallel trends assumption, we generally find no significant differences in the trends of the naturalization rates between the two groups prior to the fee waiver standardization in 2012. The only exception is the interaction in 2008, which is likely explained by a large citizenship fee increase in 2007 (from \$400 to \$675) that led to a significant but somewhat differential surge in applications right before its enactment (Lee and Rytina (2009)).

In the SI Appendix, we report a series of robustness checks which demonstrate that the results are similar when we use alternative poverty cutoff levels for the control group, change the sample restrictions, control for state-specific linear trends in naturalizations, include low-educated immigrants from Mexico, control for citizenship question imputation in the ACS, and use 2011 (instead of 2012) as the first year post-waiver standardization.

4.2 Magnitude

Our results show that the changes to the fee waiver program enabled low-income immigrants to become citizens. To interpret the 1.5 percentage point average increase as estimated in our regression, consider the year 2013, when there were approximately 5.02 million foreign-born residents who were eligible for the fee waiver and who met our sample definition. The changes to the fee waiver process enabled 1.5% of this group, or roughly 75,318 eligible LPRs, to become citizens who otherwise would not have applied. This increase amounts to about 10% of all submitted naturalization applications in 2013 or about 48% of all the 156,465 fee waiver applications that were approved for naturalizations in 2013 (United States. Department of Homeland Security (2017) (see the SI Appendix for details).

4.3 Effect Heterogeneity

For which immigrant groups was the fee waiver reform most effective? Previous research on take-up of federal benefits has shown that they often benefit the least disadvantaged among the eligible groups, since the poorest often have greater difficulty accessing the benefits [Card et al. \(2008\)](#); [Finkelstein and Notowidigdo \(2018\)](#); [Piketty et al. \(2017\)](#); [Mullainathan and Shafir \(2013\)](#). Given this finding, we might expect that the fee waiver reform, since it makes it easier to access the benefit, would have the largest effect among eligible LPRs who face weaker barriers to applying – e.g., those with relatively higher incomes, better language skills, and higher education levels.

Figure 3 shows the effects of the fee waiver standardization on the naturalization rate when we stratify the sample by income, language, education, and the propensity to naturalize. The propensity to naturalize is estimated following the methodology discussed in [Le et al. \(2019\)](#) (see the SI Appendix for details). In contrast to expectations, we find that the fee waiver reform had a larger impact on precisely those LPR groups who are most likely to be deterred by burdensome, complicated application processes. The treatment effect of easing the access to the fee waiver is more than two times as large for households without an English speaker (2.5 p.p. versus 1.1 p.p.; $p=.028$), more than twice as large for immigrants in the lowest income tercile (2.3 p.p. versus 0.9 p.p.; $p=.012$), and four times higher for individuals with lower education (2.1 p.p. versus 0.5 p.p.; $p=.004$). It is also much higher for those with the lowest as opposed to the highest propensity to naturalize (2.0 p.p. versus 0.4 p.p.; $p=.001$).

4.4 Mechanisms

What might explain the finding that the impact of the fee waiver is concentrated among the most disadvantaged eligible LPRs? It stands to reason that the subgroup of eligible LPRs who have lower levels of education, lower incomes, and lower English skills are, if anything, less well-informed about the federal fee waiver program compared to eligible LPRs with more resources [Hotard et al. \(2019\)](#). Therefore, differences in information about the fee waiver are unlikely to explain the heterogeneity in its effects on the naturalization rate. Instead, our conjecture is that part of the enabling effect is driven by immigration service providers (ISPs). Previous research demonstrates the importance of local civic structures and community organizations in mobilizing immigrants to naturalize [Bloemraad \(2006, 2018\)](#). ISPs often assist the most disadvantaged LPRs, such as those with limited English proficiency, with their citizenship applications. And in turn, many ISPs routinely screen their clients for fee waiver eligibility and help them apply. Because the reform simplified the administrative process, it likely enabled ISPs to assist or encourage more clients to apply for the fee waiver. Therefore, if ISPs are a mechanism for encouraging people to claim the federal fee waiver, this could explain why the impact of the fee waiver reform was bigger for those LPRs who face the highest barriers to citizenship.

We conducted two tests to examine the validity of this conjecture. First, we stratified the sample

geographically based on the density of ISPs in the state where the LPRs reside [IAN \(2019\)](#). The results suggest that the effects of the fee waiver standardization were about six times larger in states with a higher density of ISPs (9.0 p.p versus 1.1 p.p.; $p=.004$) (see the SI Appendix for details). Second, using survey data collected from fee waiver-eligible registrants for a state-wide naturalization program in New York (Stanford University Institutional Review Board Protocol 34554), we examined various predictors of fee waiver use. In a regression with a series of personal characteristics, we find that ISP assistance is by far the most important predictor of fee waiver use. In fact, we find that, when applying for naturalization, LPRs receiving ISP assistance were 21.5 p.p. more likely to use the fee waiver ($p=.000$, 95% CI 10.0 to 33.0; see the SI Appendix for details), controlling for demographics such as age, years of residency, household income, country of origin, and education. Taken together, these results suggest that assistance efforts by ISPs help explain why the reform raised the take-up rates especially among those who were most in need of the fee waiver program.

4.5 Enabling vs Substitution

Apart from enabling immigrants to claim the fee waiver more easily and apply for naturalization, did the reform also result in substitution effects? Consider again the year 2013, when the USCIS approved 156,462 fee waiver applications for citizenship. From this number, we subtract our estimated 75,318 newly enabled naturalizers attributed to the fee waiver reform. This leaves us with approximately 81,144 naturalizers who we do not classify as enabled by the policy reform. The question is what percentage of this group were substituters. It would be straightforward to estimate the substitution effect were there public data on the number of naturalization fee waivers prior to the reform; alas these data are not available. However, using the best available auxiliary data and a set of assumptions detailed in the SI Appendix, we calculate that only between 33,000 to 45,000 of those 81,144 fee waiver users likely would have filed a fee waiver application had the pre-reform fee waiver rules remained in place. Therefore, the remaining 36,000 to 48,000 fee waivers are likely attributable to substitution, meaning they resulted from naturalizers who were induced by the reform to use a fee waiver instead of paying out of pocket. Taken together, this decomposition suggests that of all the fee waivers approved in 2013, about half were due to newly enabled applicants, roughly a quarter were due to substitution, and roughly a quarter would have occurred anyway even under the old rules (see SI for details). This 25% substitution effect is encouragingly lower than the documented higher substitution effects on the order of 40-60% in other public benefit programs such as health insurance [Cutler and Gruber \(1996\)](#); [Dubay and Kenney \(1997\)](#); [Kronick and Gilmer \(2002\)](#); [Gruber and Simon \(2008\)](#); [Gresenz et al. \(2012\)](#), cash assistance [Albarran and Attanasio \(2002\)](#), and child care [Bassok et al. \(2014\)](#).

5 Discussion

In this study we raised three questions. On the first question, as to whether the fee waiver reform increased naturalization rates, we provide evidence of a substantial increase in naturalization rates among low-income

LPRs. On the second question of whether these effects are weaker or stronger for the neediest, we find that the effect is concentrated among the most disadvantaged LPRs, who have lower levels of education, lower English language skills, and lower incomes. On the third question, we find that the data is consistent with at least some substitution, but our calculations suggest that the enabling effect exceeded the substitution effect.

The result that among the eligible poor, the effects are stronger for the most needy stands in some tension to expectations coming from both behavioral economics and political economy. Still, the greater increase in participation among the more disadvantaged applicants is sustained despite the relatively high bandwidth tax that the most marginalized applicants may still face even after the reform. Instead of being explained by a bandwidth constraint, our results are more consistent with a framework of “structured mobilization” [Bloemraad \(2006\)](#) in which the interaction of the policy reform and the efforts of grassroots organizations channel the expression of individual agency. In particular, ISPs, which have an incentive to locate their offices in poor areas with concentrated immigrant populations, likely facilitated fee waiver take-up. The most disadvantaged therefore have had greater proximity to organizations poised to take advantage of a reduction in the bandwidth tax. We thus get a result that is more consistent with maximizing the social gains of a benefit program than would be predicted by results from similar interventions for other targeted benefits.

Similarly, the results on substitution suggest that, in contrast to the findings from some other public benefits programs, the primary effect of the fee waiver reform was to enable new applicants rather than incentivize substitution. It enabled considerably more LPRs to apply for naturalization than it induced LPRs who would have applied anyway to substitute a fee waiver for paying out of pocket. While better data is needed to more precisely estimate the magnitude of the substitution effect, it appears that the fee waiver reform compares favorably to other public benefits interventions.

More broadly, our results are consistent with findings from the small but growing literature examining the returns to policy interventions designed to lower barriers to naturalization among low-income immigrants. Previous work has demonstrated that fee vouchers and an information nudge result in substantial increases in citizenship application rates [Hainmueller et al. \(2018\)](#); [Hotard et al. \(2019\)](#). Here we find similar, albeit smaller increases from a related federal intervention that improved access to the fee waiver through the introduction of a standardized form and clear rules for eligibility. One potential reason why the magnitude of the effects found for this intervention is smaller is that those experiments were focused on subpopulations who had identified themselves as being interested in applying for citizenship. Another potential reason is that streamlining the fee waiver process constitutes a weaker intervention than a personalized fee voucher or information nudge.

Overall these findings suggest that the high application fees and difficulties accessing the fee waiver are barriers to citizenship for low-income LPRs. While these are not the only factors contributing to the relatively low citizenship rates in the United States, our results suggest that examining the returns to policy

interventions designed to facilitate access to citizenship is an important avenue for future research. Such evidence is essential to clarify the factors behind low citizenship rates and to guide policymakers and ISPs interested in raising them.

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Figure 1: Rise in Nominal Citizenship Application Fee

The vertical line denotes the time of the fee waiver standardization reform. Sources: [U.S. Citizenship and Immigration Services](#) ([2007b](#), [a](#), [2010](#), [2016b](#)). See the SI Appendix for more details.

Figure 2: The Impact of the Fee Waiver Reform on Naturalization Rates

Following the federal fee waiver reform, naturalization rates increase in the eligible (treatment) relative to the ineligible (control) group. Dots denote point estimates and vertical lines correspond to 95% confidence intervals. The number of observations is 739,301.

Figure 3: Heterogeneous Effects of the Impact of the Fee Waiver Reform across different sub-samples

The reform was more effective among LPRs who face higher barriers to naturalizing. Dots denote point estimates and horizontal lines correspond to 95% confidence intervals.

Supplementary Information for

**Standardizing the Fee Waiver Application Increased Naturalization
Rates of Low-Income Immigrants**

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1 Data

We use the 1-year American Community Survey (ACS) samples for years 2007-2016 downloaded from IPUMS-USA (Ruggles et al. 2018). Our sample is restricted to all foreign-born age 18-65 with at most 40 years of residency in the US and not living in group quarters. From this group we remove students age 18-24 who are likely student visa holders. We also exclude respondents from Mexico who have high school as their highest educational attainment or less. This group represent the largest unauthorized immigrants group (Amuedo-Dorantes and Bansak, 2012; Cohn and Passel, 2009) and are ineligible for a fee waiver. In a robustness check we show our main result holds without this restriction, although, as expected, the estimated treatment effect somewhat decreases in magnitude given that unauthorized immigrants are not affected by the standardization of the fee waiver since they are not eligible for citizenship. Next, we exclude all veterans (who are eligible for a fee waiver through a separate program) and immigrants with household income higher than 300% of the federal poverty guidelines. In a robustness check, we experiment with a 400% threshold and our results remain virtually unchanged. Lastly, we restrict the sample to immigrants with at least 6 years of residency in the United States and at least 4 years if they are married to a US citizen. As a robustness check, we vary these cutoffs and find they do not significantly alter our results.

We define the treatment group as all individuals in our sample who are eligible for a fee waiver based on the post-reform United States Citizenship and Immigration Services (USCIS) guidelines. Specifically, eligibility is established based on either household income lower than 150% of the federal poverty guidelines or receiving means-tested benefits (Medicaid, Supplemental Social Security Income, Aid to Families with Dependent Children). The control group consists of everyone else. That is, immigrants with income between 150% and 300% of the federal poverty guidelines, not receiving means-tested benefits. Summary statistics for our sample, treatment and control groups are presented in Table S1.

Note that the income-to-poverty measure we use to define the sample and assign an individual to the treatment or control group is constructed using the federal poverty guidelines. These are similar to, but different from, the poverty threshold defined by the census. We use the federal poverty guidelines because the guidelines (and not the threshold) are used to determine eligibility for administrative programs like the fee waiver. The federal poverty guidelines assign a poverty level to a given family size for a given year and location. (Alaska and Hawaii have different poverty levels than the continental United States.) We use the variables FAMSIZE to determine an individual's family size and FTOTINC for total pre-tax family income. For each year of data, we use the federal poverty guidelines for that year (e.g. the individuals from the 2015 ACS survey have their income-to-poverty ratio determined using the 2015 federal poverty guidelines).

The standardized fee waiver came into effect in late November 2010. Given that the naturalization process typically takes several months, 2012 is the first full year we may expect a differential change in the outcome. We therefore use 2012 as the first year post fee waiver reform. The timing is further complicated by the fact that the ACS is gathered year-round and hence we are unable to isolate the first from the second halves of 2011. Our results are not sensitive to this choice and remain similar when we specify 2011 as the treatment year instead.

2 Statistical Analysis

Our primary identification strategy is based on a difference-in-differences framework comparing naturalization rates in eligible (treatment) and ineligible (control) immigrants before and after the fee waiver reform came into effect (2012). In particular, we estimate the equation using an Ordinary Least Squares regression:

$$y_{ist} = \alpha + \beta_1 Treatment_{ist} + \beta_2 Post_t + \beta_3 Treatment_{ist} \times Post_t + \beta_4 X_{ist} + \beta_5 W_{st} + \gamma_s + \sigma_t + \epsilon_{ist}.$$

The term y_{ist} is a binary outcome derived from the question about a respondent's citizenship on the ACS, which is coded as 0 for non-citizens and 1 for citizens. The term $Treatment_{ist}$ is a treatment group indicator and $Post_t$ denotes 2012 or later years. The vector X_{ist} controls for personal characteristics (gender, race dummies, age, age squared, education, area of origin dummies, residency in the US, residency in the US squared, residing in metro area, indicators for being married and married to a citizen, whether the respondent speaks English at home, labor wage and labor force status) and W_{st} similarly includes state-level controls (unemployment rate, average wages and state-specific linear time trends). Next, γ_s denotes state fixed effects which control for permanent differences in naturalization rates across localities. We also control for year fixed effects (σ_t) accounting for aggregate fluctuations common to everyone. Lastly, α is the intercept and ϵ_{ist} is the error term.

The coefficient of interest is β_3 and it is interpreted as the average difference in naturalization rates in the treatment group relative to the control group due to the fee waiver standardization after accounting for an array of personal and state-level characteristics. Statistically significant positive values correspond to a positive effect on naturalization rates. On the other hand, if, for instance, immigrants lacked knowledge or information about the fee waiver reform, we may expect a statistically insignificant value consistent with no impact of the waiver reform on naturalization rates.

Our identification strategy essentially compares naturalization rates before and after 2012 of immigrants from the same area of birth, residing in the same state but on a separate side of the poverty cutoff (and means-tested benefits indicator) while controlling for detailed demographic and labor market characteristics. The underlying identification assumption states that, in the absence of the fee waiver reform, naturalization behavior across our treatment (eligible) and control (ineligible) groups would have followed parallel trajectories. In other words, we assume away any time-varying factors that differentially affect naturalization of, for instance, an immigrant from Bulgaria residing in Arizona with income of 130% of the federal poverty guidelines to another Bulgarian-born from Arizona with income of 170% of the federal poverty guidelines and not receiving means-tested benefits.

We provide some evidence supporting this parallel trends assumption by examining naturalization trends prior to 2012. Specifically, we interact the treatment group variable ($Treatment_{ist}$) with indicators for each year. Similar trends prior to the policy are consistent with statistically insignificant values for the interactions before year 2012. The results are shown in Figure 2 and discussed below.

3 Supplementary Text

3.1 Background on the Fee Waiver

The budget of USCIS is dependent on fees from the customers that use its services. The fees that USCIS charge for document processing range from \$130 to \$1,435, with the current cost of processing an application for naturalization set at \$640 plus \$85 for biometric processing (USCIS, 2016a). The regulations at 8 CFR 103.7(c) state that USCIS has the discretionary authority to waive the fee for a specific applicant if 1) the party requesting the benefit is unable to pay the prescribed fee and 2) a waiver based on inability to pay is consistent with the status or benefit sought.

Before 2010, an applicant could request a fee waiver by sending a letter or affidavit with documentation demonstrating an inability to pay the fee. USCIS guidance at that time stated that a person would not automatically qualify for a fee waiver based on any particular situation and each case would be considered individually on its own merits. Its guidance did provide circumstances which would make someone likely eligible (income under a certain threshold, receipt of means tested benefits within the last 180 days, etc), but it made clear that no specific circumstance would automatically qualify someone for a fee waiver (USCIS, 2007a).

In 2009, USCIS began developing the I-912 form to standardize the process of applying for and approving fee waivers. The agency initially released the document in the summer of 2010 for comments and

finalized a version of the form in November 2010. For the first time, requests for the fee waiver could be made through a standardized form rather than through non-uniform letters and affidavits (USCIS, 2010). After releasing the new form, USCIS issued new internal guidance on how the inability to pay would be determined using three criteria 1) if the person received means-tested benefits, 2) if the person's household income was at or below 150% of the federal poverty guidelines, and 3) if they could show they faced a financial hardship. While maintaining that each application must be considered uniquely on its own merits, the new guidance went much further in saying that if one of the three criteria were met, the fee waiver would normally be approved (USCIS, 2011a).

At the time, USCIS predicted that the form would have 85,000 users per year (USCIS, 2012). However, the number of users quickly ballooned to 400,000 users in 2012 (USCIS, 2012) and 600,000 users in 2016 (USCIS, 2017). The cost of the fee waiver for USCIS also increased during that time, from an estimated \$191 million in 2010 to \$613 million in 2016 (USCIS, 2016a). In order to pay the processing cost of fee waiver users, USCIS has had to increase the fees for users that do not use fee waivers. USCIS estimated that 40% of the price increases that it introduced in 2016 were to cover the cost of processing documents for fee waiver recipients (USCIS, 2016a).

In 2016, USCIS expanded the fee waiver program for naturalization applicants by offering a partial fee waiver for the N-400 form for immigrants whose income fell between 150-200% of the federal poverty guidelines (USCIS, 2016a). In 2018, USCIS suggested changes to the fee waiver program that would limit its usage. The new changes included eliminating the possibility of using means-tested benefits to qualify for the program and requiring applicants to submit a tax transcript rather than a tax return (USCIS, 2018). The comment period for changes to the fee waiver closed in October 2018. As of May 2019, USCIS has not responded to the public's comments or stated whether it will move ahead with its planned changes.

3.2 Descriptive Statistics

Table S1 presents summary statistics for our overall sample (left panel), control group (middle panel) and treatment group (right panel). The two groups look similar in terms of demographic characteristics but the eligible group of immigrants has, by design, significantly lower income and higher uptake of public services.

Figure S1 shows the unadjusted naturalization rates for the time period in our sample. The steeper line for the treatment group after 2011 suggests there may be a differential increase in naturalization relative to control due to the fee waiver reform. Nevertheless, we have to use caution in interpreting this trend as it merely presents the raw data, not controlling for any covariates or compositional changes.

3.3 Parallel Trends

Figure 2 in the main text shows the coefficients on the interaction terms of the treatment group dummy and year indicators. The assumption behind our empirical strategy, often referred to as a “parallel trends” assumption, dictates there should be no statistically significant difference in naturalization rates between treatment and control prior to 2012. The figure shows this holds for all but the interaction in year 2008. We believe this discrepancy might be explained by a sudden and large citizenship fee increase in 2007 (from \$330 to \$595; see Figure 1 in the main text) which lead to a significant surge in applications right before its enactment (Lee and Rytina, 2009). Given the magnitude of the price increase, it is likely this policy change affected naturalization behavior among poorer and richer immigrants differentially. Note that, because the application approval process takes several months, 2008 is indeed the year we might expect naturalization rates to differ between treatment and control as a response to this price change.

3.4 Main Results

Table S2 displays our main results for the effect of the fee waiver reform on citizenship rates. Each column shows the difference-in-differences estimate for a separate window around year 2012. The bottom row in Figure 3 shows the estimate from the third column (2009-2014). There is a 1.5 percentage points increase in naturalization rates in treatment relative to control which is attributable to the fee waiver standardization under the identification assumptions.

Next, Tables S3-S6 present similar results using the various subsamples shown in the upper rows of Figure 3. The effect of the fee waiver reform is larger for households without an English speaker (Table S3: 2.5 p.p. versus 1 p.p.), immigrants in the lowest income tercile (Table S4: 2.3 p.p. versus 0.9 p.p.), individuals with lower education (Table S5: 2.1 p.p. versus 0.5 p.p.) and lowest propensity to naturalize (Table S6: 2.0 p.p. versus 0.4 p.p.). Overall, these findings suggest the fee waiver standardization had the highest effect on the most disadvantaged LPR groups.

We estimate the propensity to naturalize using Le et al. (2019)’s methodology. Specifically, we ran a logistic regression of naturalization on individual characteristics for the years prior to 2012. Next, we estimated the predicted odds of naturalizing (the ratio of the probability of naturalizing to its complement) for every immigrant and split the sample into three equal groups, or terciles. The individuals in the top (bottom) tercile have the highest (lowest) predicted propensity to naturalize. Certain individual characteristics such as length of residency in the US, married to a US citizen, and age strongly correlate with immigrant naturalization. Intuitively, all else equal, foreign-born with these attributes naturalize at higher rates relative

to their counterparts. We then estimated the effect of the fee waiver standardization separately for each of these three terciles and present the results in Table [S6](#).

Lastly, to aid interpretation of the magnitude of the estimated effect, Table [S7](#) shows the marginal effects of individual characteristics on the probability of naturalizing. These are estimated using with a linear probability model, although the estimated marginal effects from a logit model are very similar. For instance, holding everything else constant, an additional year of residency in the US is associated with, on average, 3.1 percentage points higher probability of naturalizing. Moreover, a \$10,000 higher wage salary is associated with an increase in the same probability by 1.6 percentage points. Consistent with the results by [Le et al. \(2019\)](#), we find that being married to a citizen is associated with increased naturalization rates in our sample.

3.5 Robustness Checks

Table [S8](#) presents several robustness checks of our main finding. Specifically, Panel A shows the results from an alternative poverty cutoff level for the control group - 400% of the federal poverty guidelines (instead of 300%). Next, in Panel B we control for state-specific linear trends in naturalization which account for differential trajectories across localities. In Panel C we change the sample restriction to 5 years of residency in the US and 3 years for immigrants married to a US citizen (instead of 6 and 4 years respectively). Next, in Panel D we do not exclude low educated immigrants from Mexico and, lastly, in Panel E we use 2011 (instead of 2012) as the first year post-waiver standardization. Lastly, in Panel F we control for the citizenship question imputation flag in the IPUMS ACS data.

We find a statistically significant impact of the fee waiver reform in all panels. Increasing the poverty cutoff level in Panel A slightly decreases the estimated effect to 1.3 p.p. (third column), while controlling for state-specific trends in Panel B leaves it unchanged. In Panel C where we change the residency sample restriction the magnitude remains the same. The most significant change comes from including Mexican-born high school graduates and dropout which results in including many ineligible immigrants in the treatment group. Unsurprisingly, the effect of the waiver then decreases to 0.9 p.p. while it remains statistically significant. Our main result is also robust to changing the year of the policy change from 2012 to 2011 and to controlling for the citizenship imputation flag in the IPUMS data. IPUMS imputes the citizenship status of about 6% of the immigrants in our sample. Alternatively, we ran our main difference-in-differences model when dropping these observations and our results remained unchanged. This robustness check was motivated by a recent study by [Brown et al. \(2018\)](#) showing discrepancies in reported citizenship in surveys compared to information about citizenship status in matched administrative data.

3.6 The Role of Immigrant Service Providers

A potential explanation for the finding that the most disadvantaged LPRs experienced the largest boost in naturalizations due to the fee waiver standardization is the role of immigrant service providers (ISPs). They routinely verify their clients' fee waiver eligibility and assist them in filing an application. Thus, they fill an important information gap among low-income LPRs about the option to waive the citizenship fee. We conducted two tests of this potential mechanism. First, we used state-level data on the number of ISPs from the National Immigration Legal Services Directory (IAN, 2019) containing information on nonprofit organizations providing low-cost or free immigration legal services. We then estimated the fee waiver reform impact in the states with above and below the median number ISPs per LPR in our sample. We also restricted the sample to LPRs residing in central cities since this is where most ISPs operate.

Table S9 presents the difference-in-difference results. Panel A (B) shows the estimates for the fee waiver reform impact on naturalization rates in principal cities below (above) the median ISPs per foreign-born. As above, our preferred estimates are shown in the third column. The fee waiver standardization had a much larger effect in areas with higher IPS density: 7.5 p.p. versus 1.2 p.p. This pattern holds if we split the sample by other metrics, e.g., the 66th or 70th percentiles.

In our second test we used survey data collected from registrants for a state-wide naturalization program in New York in 2017 and tested which characteristics predict fee waiver usage. The experiment included 1,537 low-income immigrants in New York who registered for a program that would offer financial assistance with their naturalization application for details see (Hainmueller et al., 2018; Hotard et al., 2019). Participants that were screened as being eligible for the fee waiver were randomly shown one of two final messages at the end of the registration. One final message included information about the fee waiver and a network of immigration service providers, and the other message only contained information about the network of service providers with no mention of the fee waiver.

In a follow-up survey, research participants were asked if they applied for naturalization, if they used a fee waiver, and if they had received any type of assistance on their naturalization application. Survey responses were collected for 935 of the 1,537 research participants (61% response rate). Overall, 31% reported that they applied for naturalization, and 73% of that group had applied using a fee waiver.

Table S10 shows a regression where the outcome variable measures whether someone used the fee waiver when applying for naturalization or not. It includes the 254 respondents who reported that they had applied for citizenship and also answered the follow-up questions about the fee waiver usage and receiving assistance with their application. The results show that receiving assistance from an ISP (defined as a free

lawyer or non-profit) increased the likelihood of using a fee waiver by 21.5 percentage points (controlling for the other covariates).

3.7 Enabling vs Substitution

Table [S11](#) presents information on citizenship applications and fee waivers for fiscal years 2009-2016 published by the USCIS in various reports and memos. The first column denotes the fiscal year (which runs from October to September), while the second and third columns show the number of citizenship applications (N-400) filed and the number of fee waivers approved for citizenship applications. The fourth column shows the total number of fee waivers approved by the USCIS. The total in the fourth column additionally includes fee waivers for immigration-related applications other than naturalization - e.g., replacement of green card, employment authorization, etc. The fifth column presents the share of fee waivers for citizenship applications among the total number of fee waivers approved by the USCIS.

The total number of fee waivers used for citizenship applications in a given year is composed of three LPR groups: newly-enabled applicants for citizenship, those would have used the fee waiver under the old rules in the absence of the standardization, and substituters who would have applied for citizenship and paid out of pocket before the standardization, but now use a fee waiver instead. Our goal in this subsection is to calculate the share for each of these groups.

As an example, we focus on fiscal year 2013 and use the information in Table [S11](#). In that year, there were 156,462 fee waivers approved for citizenship applications.

- The size of the first group (newly enabled applicants for citizenship) is straightforward to calculate. We multiply the total number of foreign-born who were eligible for the standardized fee waiver and met our sample definition (5.02 million) by the treatment effect from our difference-in-difference analysis (1.5 p.p.; Table [S2](#), column 3) to obtain 75,318 newly-enabled foreign-born.
- To calculate an estimate for the second group (those who would have used the fee waiver even without the reform), we would ideally want to know how many people were applying for citizenship with a fee waiver before the standardization of the application. Unfortunately, USCIS has not released a breakdown of the type of forms for which fee waivers were used before 2013, so the number of fee waivers for citizenship applications in fiscal year 2010 can only be estimated. To obtain this estimate, we first assume that the share of fee waivers used for citizenship applications was not very different in the period before the reform. This assumption is based on the observation that the reform applied to all immigration-related forms that were eligible for a fee waiver prior to the reform (e.g.,

replacement of green card, employment authorization, etc.), so we would not expect the reform to markedly change the share of fee waivers for naturalization compared to the share of fee waivers for other forms. From 2013 to 2016, the citizenship applications accounted for between 33.0% and 38.8% of fee waiver requests. To be conservative, we therefore estimate that the share of fee waivers used for citizenship before the reform ranged from 30% to 40%. By applying this range to the total number of fee waivers used in fiscal year 2010 (100,588), we estimate that the total fee waivers used for citizenship applications in that year ranged from 30,176 to 40,235. We further assume the growth in the number of fee waivers was the same as the total growth of the eligible foreign born population from 2010 to 2013 (10.6%). Adjusting for this, we estimate that there were between 33,375 and 44,500 LPRs who would have used the fee waiver for naturalization regardless of the reform.

- The remaining share of the 156,462 fee waiver users that is not assigned to the first two groups are classified as the third group (substituters). Taking 156,462, then subtracting 75,318, then subtracting either 33,375 or 44,500 results in an estimate for substituters ranging from 47,769 to 36,644.

Overall, this rough calculation suggests that about half of the citizenship application fee waivers in 2013 were filed by newly-enabled naturalizers, a quarter by immigrants who would have used the fee waiver absent the reform, and a quarter by substituters who would have naturalized anyway.

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4 Appendix Figures

Figure S1: Naturalization Rate over Time

Notes: Unadjusted naturalization rates in the treatment (black solid line) and control (blue dashed line) groups over time. The vertical line corresponds to the fee waiver standardization.

5 Appendix Tables

Table S1: Descriptive Statistics

	Overall		Control		Treatment	
	mean	sd	mean	sd	mean	sd
Male	0.48	0.50	0.50	0.50	0.45	0.50
Age	42.54	11.22	42.59	11.00	42.50	11.45
White	0.43	0.50	0.44	0.50	0.43	0.49
Black	0.12	0.32	0.12	0.32	0.12	0.32
Asian	0.24	0.42	0.25	0.43	0.23	0.42
In Central City	0.26	0.44	0.22	0.42	0.29	0.46
Years Education	11.64	3.93	12.12	3.70	11.16	4.08
Married	0.20	0.40	0.20	0.40	0.20	0.40
Married to a Citizen	0.39	0.49	0.44	0.50	0.33	0.47
Residency in the US (yrs)	19.27	9.04	19.59	9.07	18.96	8.99
Naturalized Citizen	0.55	0.50	0.58	0.49	0.53	0.50
Speaks English at Home	0.12	0.33	0.13	0.34	0.11	0.32
Wage Income (\$10,000s)	1.54	1.60	2.09	1.72	0.98	1.23
Unemployed	0.07	0.25	0.05	0.22	0.09	0.29
Out of Labor Force	0.23	0.42	0.16	0.36	0.31	0.46
Income / Poverty Line	1.66	0.76	2.23	0.43	1.08	0.56
Has Medicaid	0.18	0.38	0.00	0.00	0.36	0.48
Welfare Income (\$)	75.32	727.19	0.00	0.00	151.97	1027.27
Observations	739301		377702		361599	

Notes: Descriptive statistics of our main sample (left panel), the control (middle panel) and treatment (right panel) groups. Sample sizes are shown in the bottom row.

Table S2: Difference-in-Difference Estimates: Main Specification

	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.015*** (0.003)	0.012*** (0.002)	0.015*** (0.002)	0.012*** (0.003)
Observations	739301	601892	461089	312522
Adjusted R^2	0.365	0.366	0.368	0.369

Notes: Difference-in-differences estimates of the effect of the fee waiver reform on naturalization for various windows in our main specification. The outcome variable is an indicator for being a naturalized citizen. The included controls are individual characteristics (age, race, marital status, labor market outcomes, residency in the US, English speaker, residing in metro area), state-level economic conditions (unemployment and wage levels), state, year and area of origin fixed effects. See above for more information on the empirical strategy and how treatment and control are defined. Standard errors are clustered by state and shown in parenthesis. All regressions are weighted by the sampling weight. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table S3: Difference-in-Difference Estimates By Linguistic Isolation

Panel A: Households with an English Speaker				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.013*** (0.003)	0.010*** (0.003)	0.011*** (0.003)	0.007* (0.003)
Observations	537397	437602	335188	227136
Adjusted R^2	0.308	0.309	0.312	0.315

Panel B: Households without an English Speaker				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.019*** (0.004)	0.018*** (0.005)	0.025*** (0.006)	0.023*** (0.005)
Observations	201904	164290	125901	85386
Adjusted R^2	0.480	0.481	0.481	0.482

Notes: Difference-in-differences estimates of the effect of the fee waiver reform on naturalization for various windows in a subsample of households without an English speaker (Panel A) and with an English speaker (Panel B). The outcome variable is an indicator for being a naturalized citizen. The included controls are individual characteristics (age, race, marital status, labor market outcomes, residency in the US, English speaker, residing in metro area), state-level economic conditions (unemployment and wage levels), state, year and area of origin fixed effects. See above for more information on the empirical strategy how treatment and control are defined. Standard errors are clustered by state and shown in parenthesis. All regressions are weighted by the sampling weight. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table S4: Difference-in-Difference Estimates By Income

Panel A: Bottom Tercile				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.018*** (0.003)	0.018*** (0.003)	0.023*** (0.003)	0.018*** (0.004)
Observations	498294	404287	310721	210983
Adjusted R^2	0.364	0.366	0.368	0.368
Panel B: Middle Tercile				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.008*** (0.003)	0.011*** (0.003)	0.013*** (0.004)	0.011*** (0.004)
Observations	498212	403061	308318	208629
Adjusted R^2	0.370	0.372	0.373	0.373
Panel C: Top Tercile				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.016*** (0.004)	0.008* (0.004)	0.009** (0.004)	0.006 (0.006)
Observations	498199	403312	306734	206792
Adjusted R^2	0.359	0.360	0.361	0.362

Notes: Difference-in-differences estimates of the effect of the fee waiver reform on naturalization for various windows in a subsample of low (Panel A), medium (Panel B) and high (Panel C) income eligible immigrants. The three groups correspond to terciles of the poverty level distribution in the treatment group. The control group is unchanged and the same as in Table S2. The outcome variable is an indicator for being a naturalized citizen. The included controls are individual characteristics (age, race, marital status, labor market outcomes, residency in the US, English speaker, residing in metro area), state-level economic conditions (unemployment and wage levels), state, year and area of origin fixed effects. See above for more information on the empirical strategy and how treatment and control are defined. Standard errors are clustered by state and shown in parenthesis. All regressions are weighted by the sampling weight. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table S5: Difference-in-Difference Estimates By Education Level

Panel A: High School or Lower				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.018*** (0.003)	0.017*** (0.004)	0.021*** (0.004)	0.018*** (0.004)
Observations	443659	360308	276696	188082
Adjusted R^2	0.448	0.450	0.452	0.454
Panel B: Some College or More				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.011*** (0.003)	0.005 (0.004)	0.005 (0.004)	0.001 (0.006)
Observations	295642	241584	184393	124440
Adjusted R^2	0.357	0.358	0.358	0.359

Notes: Difference-in-differences estimates of the effect of the fee waiver reform on naturalization for various windows in a subsample of immigrants with High School or lower education level (Panel A) and at least some college experience (Panel B) immigrants. The outcome variable is an indicator for being a naturalized citizen. The included controls are individual characteristics (age, race, marital status, labor market outcomes, residency in the US, English speaker, residing in metro area), state-level economic conditions (unemployment and wage levels), state, year and area of origin fixed effects. See above for more information on how the treatment and control groups are defined. Standard errors are clustered by state and shown in parenthesis. All regressions are weighted by the sampling weight. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table S6: Difference-in-Difference Estimates By Propensity to Naturalize

Panel A: Bottom Tercile				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.018*** (0.004)	0.016*** (0.004)	0.020*** (0.003)	0.015*** (0.005)
Observations	246434	201097	154143	104514
Adjusted R^2	0.119	0.118	0.118	0.117
Panel B: Middle Tercile				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.013*** (0.004)	0.009** (0.004)	0.010** (0.005)	0.008 (0.007)
Observations	246434	200047	152576	103144
Adjusted R^2	0.049	0.050	0.051	0.052
Panel C: Top Tercile				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	-0.000 (0.003)	0.000 (0.003)	0.004 (0.003)	0.002 (0.003)
Observations	246433	200748	154370	104864
Adjusted R^2	0.038	0.039	0.040	0.040

Notes: Difference-in-differences estimates of the effect of the fee waiver reform on naturalization for various windows in a subsample of low (Panel A), medium (Panel B) and high (Panel C) propensity to naturalize immigrants. This propensity is estimated following the methodology in [Le et al. \(2019\)](#) and the three groups are split around the terciles of the distribution of predicted odds to naturalize. The outcome variable is an indicator for being a naturalized citizen. The included controls are individual characteristics (age, race, marital status, labor market outcomes, residency in the US, English speaker, residing in metro area), state-level economic conditions (unemployment and wage levels), state, year and area of origin fixed effects. See above for more information on the empirical strategy, how treatment and control are defined and how the propensity to naturalize is estimated. Standard errors are clustered by state and shown in parenthesis. All regressions are weighted by the sampling weight. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table S7: Immigrant Characteristics and the Propensity to Naturalize

	Naturalized Citizen	
	b	se
Male	-0.056***	(0.004)
Age	-0.012***	(0.001)
Age ²	0.000***	(0.000)
White	0.017**	(0.007)
Black	0.094***	(0.016)
Asian	-0.021	(0.019)
In Central City	0.004	(0.012)
Years Education	0.005*	(0.003)
Married	-0.279***	(0.005)
Married to a Citizen	0.237***	(0.007)
Speaks English at Home	0.011	(0.009)
Residency in the US (yrs)	0.031***	(0.001)
Residency in the US ² (yrs)	-0.000***	(0.000)
Wage Income	0.016***	(0.002)
Unemployed	0.003	(0.002)
Out of Labor Force	-0.001	(0.004)
Observations	739301	
Adjusted R^2	0.362	

Notes: Estimated coefficients from a linear probability model of an indicator for being a naturalized citizen on a set of covariates and area of origin dummies. The sample size is 739,301. Standard errors are clustered by state and shown in parenthesis.

* $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table S8: Difference-in-Difference Estimates: Robustness Checks

Panel A: 400% of Federal Poverty Line				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.013*** (0.002)	0.011*** (0.003)	0.013*** (0.003)	0.010*** (0.004)
Observations	957714	776690	592663	399827
Adjusted R^2	0.358	0.360	0.362	0.363
Panel B: Controlling for Linear State Trends				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.014*** (0.003)	0.012*** (0.003)	0.015*** (0.004)	0.011*** (0.004)
Observations	739301	601892	461089	312522
Adjusted R^2	0.365	0.366	0.368	0.369
Panel C: Residency in the US ≥ 5				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.015*** (0.003)	0.012*** (0.002)	0.015*** (0.002)	0.012*** (0.003)
Observations	765843	623629	477718	323859
Adjusted R^2	0.377	0.379	0.380	0.382
Panel D: Including Low-Skill Immigrants from Mexico				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.007*** (0.002)	0.006** (0.002)	0.009*** (0.002)	0.007** (0.003)
Observations	1079101	878936	674053	456775
Adjusted R^2	0.408	0.410	0.411	0.412
Panel E: Fee Waiver Introduced in 2011				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.011*** (0.003)	0.008*** (0.002)	0.012*** (0.002)	0.010*** (0.004)
Observations	739301	601892	461089	312522
Adjusted R^2	0.365	0.366	0.368	0.369
Panel F: Controlling for IPUMS Citizenship Imputation Flag				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.015*** (0.003)	0.012*** (0.002)	0.016*** (0.002)	0.012*** (0.003)
Observations	739301	601892	461089	312522
Adjusted R^2	0.365	0.367	0.369	0.370

Notes: Robustness checks for the difference-in-differences estimates of the effect of the fee waiver reform on naturalization. Panel A shows the results from an alternative poverty cutoff level for the control group - 400% of the federal poverty line (instead of 300%), in Panel B we control for state-specific linear trends in naturalization, in Panel C we change the the sample restriction to 5 years residency in the US and 3 years for immigrants married to a US citizen (instead of 6 and 4 years respectively), in Panel D we do not exclude low education immigrants from Mexico, in Panel E we use 2011 as the first year post-waiver standardization (instead of 2012) and in Panel F we control for IPUMS citizenship imputation flag. The outcome variable is an indicator for being a naturalized citizen. The included controls are individual characteristics (age, race, marital status, labor market outcomes, residency in the US, English speaker, residing in metro area), state-level economic conditions (unemployment and wage levels), state, year and area of origin fixed effects. See above for more information on the empirical strategy and how the treatment and control groups are defined. Standard errors are clustered by state and shown in parenthesis. All regressions are weighted by the sampling weight. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table S9: Difference-in-Difference Estimates By High/Low Immigrant Service Provider Density

Panel A: Below Median ISPs per LPR				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.014** (0.006)	0.010* (0.005)	0.011* (0.006)	0.014** (0.007)
Observations	175156	142633	109355	74617
Adjusted R^2	0.344	0.344	0.345	0.346

Panel B: Above Median ISPs per LPR				
	2007-2016	2008-2015	2009-2014	2010-2013
Difference-in-Differences	0.061*** (0.021)	0.069*** (0.024)	0.090*** (0.027)	0.122*** (0.036)
Observations	12019	9757	7585	5163
Adjusted R^2	0.365	0.367	0.376	0.361

Notes: Difference-in-differences estimates of the effect of the fee waiver reform on naturalization for LPRs residing in principal cities in low (Panel A) and high (Panel B) ISP density states. ISP density is measured as the state-level number of ISPs per LPR. The outcome variable is an indicator for being a naturalized citizen. The included controls are individual characteristics (age, race, marital status, labor market outcomes, residency in the US, English speaker, residing in metro area), state-level economic conditions (unemployment and wage levels), state, year and area of origin fixed effects. See above for more information on the empirical strategy, how treatment and control are defined and how the propensity to naturalize is estimated. Heteroscedasticity-robust standard errors are shown in parenthesis. All regressions are weighted by the sampling weight. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table S10: Effect of Application Assistance

	Used Fee Waiver for Naturalization	
	(1)	(2)
Received assistance from an ISP or a free lawyer	0.227*** (0.0577)	0.215*** (0.0586)
Received assistance from lawyer that charged a fee	0.105 (0.116)	0.0490 (0.114)
Received assistance from family or friend	-0.112 (0.0962)	-0.106 (0.0887)
Ever received a fee waiver notice		0.144* (0.0751)
High school/GED degree		-0.0272 (0.0750)
Some college		-0.0403 (0.0828)
BA degree or higher		-0.192** (0.0809)
Female		-0.0355 (0.0544)
English (preferred)		-0.0788 (0.0642)
Years on green card		-0.00175 (0.0124)
Years on green card squared		0.0000158 (0.000300)
Age		0.0312** (0.0129)
Age squared		-0.000343** (0.000155)
Household income (binned to quartiles)=2		0.0242 (0.0730)
Household income (binned to quartiles)=3		0.0253 (0.0789)
Household income (binned to quartiles)=4		0.00855 (0.0826)
Married		-0.0797 (0.0626)
Dominican Republic		0.156** (0.0669)
China		-0.0504 (0.105)
Ecuador		-0.00485 (0.148)
Constant	0.652*** (0.0480)	0.0709 (0.268)
Observations	254	254
Adjusted R^2	0.072	0.135

Notes: Regression coefficients shown with robust standard errors in parenthesis. Model 1 regresses the outcome of whether a person used the fee waiver when applying for naturalization on whether or not the applicant received professional or non-professional assistance with their application. Model 2 includes covariates that model the covariate set used in the analysis of the ACS data. The data for this analysis comes from a follow-up survey of an experiment in New York measuring the effect of notifying immigrants about their fee waiver eligibility. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

Table S11: Annual N-400 and Fee Waiver Applications (FY2009 - FY2016)

Year	N-400s Filed ¹	N-400 Fee Waivers Approved ²	Total Fee Waivers Approved	N-400 Share of Total Fee Waivers
FY2009	570,442	Unreported	64,245 ³	.
FY2010	710,544	Unreported	100,588 ⁴	.
FY2011	756,008	Unreported	180,240 ⁴	. ⁵
FY2012	899,162	Unreported	370,773 ⁴	.
FY2013	772,623	156,462	403,227 ⁶	38.8%
FY2014	773,824	152,271	457,576 ⁶	33.3%
FY2015	783,062	171,364	518,777 ⁶	33.0%
FY2016	972,151	227,044	627,959 ⁶	36.2%

Notes: ¹ United States Department of Homeland Security (2017)

² USCIS (2017), calculated from dividing the reported foregone revenue by the cost of submitting an N-400 application.

³ North (2010)

⁴ USCIS (2012)

⁵ For FY2011, notes from a USCIS stakeholder's call (USCIS 2011b) indicate that there were 23,166 N-400 fee waivers approved out of 87,331 total fee waivers approved (26.5% of fee waiver requests), but the notes did not clearly indicate which period of the year was covered by these numbers. Because we cannot know if fee waiver rates for specific forms remain steady throughout a fiscal year, we do not assume this rate applies to the entire year.

⁶ USCIS (2017)

Table S12: Nominal Cost of a Naturalization Application (1985-2017)

Year	Fee Change in Year	Total Cost to Naturalize (\$)	N-400 Fee (\$)	Biometric Fee (\$)	Source
1985		35	35		72 FR 4887 - 4915
1986		35	35		
1987		35	35		
1988		35	35		
1989	Yes	60	60		72 FR 4887 - 4915
1990		60	60		
1991	Yes	90	90		72 FR 4887 - 4915
1992		90	90		
1993		90	90		
1994	Yes	95	95		72 FR 4887 - 4915
1995		95	95		
1996		95	95		
1997		95	95		
1998	Yes	250	225	25	72 FR 4887 - 4915
1999		250	225	25	
2000		250	225	25	
2001		250	225	25	
2002	Yes	310	260	50	72 FR 4887 - 4915
2003		310	260	50	
2004	Yes	390	320	70	72 FR 4887 - 4915
2005		400	330	70	
2006	Yes	400	330	70	72 FR 4887 - 4915
2007	Yes	675	595	80	72 FR 29851 - 29874
2008		675	595	80	
2009		675	595	80	
2010	Yes	680	595	85	75 FR 58961 - 58991
2011		680	595	85	
2012		680	595	85	
2013		680	595	85	
2014		680	595	85	
2015		680	595	85	
2016	Yes	725	640	85	81 FR 73292 - 73332
2017		725	640	85	

Notes: The fees for 1985 - 2006 were taken from a summary table in (USCIS, 2007b). The source for each subsequent change in the fees are from the Final Rule that established the new fee (USCIS, 2007c, 2010, 2016b). Fee amounts are not adjusted for inflation.