

# Naturalization Policy in the First Year of the Trump Administration

## What Changed and What to Expect

### INTRODUCTION

The New Americans Campaign (NAC) is the leading national collaborative devoted to increasing naturalization, working with hundreds of organizations across the country to expand access to U.S. citizenship through direct services, capacity-building, and policy advocacy. Drawing on the experience of frontline practitioners, public data, and national trends, NAC monitors and analyzes federal policies that shape access to naturalization.

During the first year of this Trump administration, naturalization has faced a series of policy and practice changes that have made accessing U.S. citizenship more difficult. With approximately [nine million](#) eligible-to-naturalize lawful permanent residents (LPRs) in the United States, understanding these developments is critical to ensure future access to U.S. citizenship.

This brief offers an overview of a few key policy changes affecting naturalization over the last year, examines available naturalization data, and highlights emerging trends to watch in the year ahead.

### KEY TAKEAWAYS

- Access to citizenship is narrowing despite unchanged statutory eligibility.
- Although more than 750,000 people naturalized last year, naturalization denials increased almost 17% in 2025, outpacing growth in applications and approvals.
- Recent policy changes suggest 2026 may bring longer wait times, higher denial rates, and increased risk for some applicants.
- Now is the time to invest in and expand naturalization services to ensure that the nine million eligible LPRs can access U.S. citizenship.

### PAUSE ON NATURALIZATION ADJUDICATIONS

In December 2025, the administration [announced a hold](#) on all immigration benefits requests, including naturalization, for nationals of 40 countries on a travel ban list. Applicants from these countries received notices of cancelled interviews and oath ceremonies. While LPRs from these countries can still apply for naturalization, there is no timeline for when the pause will end. Some applicants from other countries have experienced interview and oath ceremony postponements and cancellations, often with no explanation, creating confusion and delays.

## HEIGHTENED SCRUTINY AND ENFORCEMENT RISKS

In February 2025, U.S. Citizenship and Immigration Services (USCIS) issued a new **Notice to Appear (NTA) guidance** directing officers to issue an NTA (the first step in initiating removal proceedings) to deportable naturalization applicants. This was a change in policy from the Biden Administration, which occasionally approved deportable applicants with strong positive equities, and generally did not issue an NTA upon naturalization denials.

In June 2025, USCIS updated its Policy Manual with [new guidance](#) on the **N-648 disability waiver**, which exempts certain applicants from the English and/or civics test requirements for naturalization. Along with several practice changes, USCIS broadened the permissible reasons to doubt the validity of the waiver, giving officers more opportunities to second-guess medical diagnoses and deny the request.

In August 2025, USCIS issued a [memo](#) announcing significant changes to how the agency assesses whether applicants meet the **good moral character (GMC)** requirement for naturalization. The memo stated that, “Going forward, USCIS officers must account for a [noncitizen’s] positive attributes and not simply the absence of misconduct.” The implementation of this memo has been unclear and inconsistent, raises concerns about potential abuse of discretionary denials, and probably will lead to an increase in naturalization application denials based on GMC.

Later in August 2025, USCIS released a [memo](#) on the resumption of **personal investigations** (also called neighborhood investigations) for naturalization applicants, which have not been implemented in over 30 years. These include visits in the vicinity of an applicant’s home and workplace, allowing USCIS to pursue investigations to confirm an applicant’s eligibility for naturalization. As with the GMC memo, the implementation of this memo has been unclear. NAC partners in Minnesota have reported USCIS visits to naturalization applicants’ homes looking for instances of fraud in fee waiver and reduced fee applications, suggesting this memo being put into practice.

In response to these developments, many naturalization practitioners are filing **Freedom of Information Act (FOIA)** requests to ensure they have complete and accurate information about their client’s case before applying for naturalization. However, there has been an increase in inappropriate denials and redactions for FOIA requests, requiring appeals or re-filing requests and further delaying the application process.

## CHANGES TO THE NATURALIZATION CIVICS TEST

In October 2025, USCIS **changed the civics test** for naturalization, requiring applicants to answer up to 20 questions from a list of 128. Applicants must answer 12 correctly to pass. Previously, applicants only needed to answer 10 questions from a list of 100 questions, and they only needed to answer six correctly. This change has made the test more difficult and increased preparation burdens for applicants and instructors, and some applicants have reported being given the new test despite submitting their applications before the test change deadline.

## REDUCED SERVICE CAPACITY AND EMERGING BARRIERS

In early 2025, USCIS **terminated funding** for the Citizenship and Integration Grant Program, which provided funding for naturalization legal services and test preparation classes to over 30 NAC partners and many other nonprofits, cutting millions of dollars for naturalization services. In addition to the loss of federal funding, NAC has heard from partners that **many organizations are experiencing reductions in**

**philanthropic support.** These combined funding pressures have further constrained staffing and program capacity at a time when naturalization cases require more intensive legal and client support.

This administration has placed renewed focus on **denaturalization**, the process of revoking someone’s citizenship. Historically, there have been very few denaturalization cases, and it is a resource-intensive process for the government. There have been reports of internal guidance at USCIS to refer 100-200 denaturalization cases per month to the Department of Justice. In addition, there is proposed legislation which could expand the grounds for denaturalization, greatly increasing the risk of individuals and their family members losing citizenship.

**Heightened immigration enforcement and scrutiny** have made many prospective applicants nervous about applying and hesitant to attend large naturalization events. Naturalization providers are investing more time in building trust and shifting to small events or one-on-one services. Partners have shared safety measures such as avoiding publishing event locations and limiting who is permitted to enter event spaces. While practitioners continue to adapt, each case increasingly requires more time and resources.

There is an emerging need for timely, accessible **Know Your Rights information** tailored to lawful permanent residents and naturalized citizens navigating potential encounters with Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP), and risks to family members within mixed-status households, international travel, and social media use, among other activities.

## NATURALIZATION DATA

Available [data](#) from January through October 2025 does not show dramatic changes in naturalization application form submissions, approvals, denials, or processing times, though some indicators may reflect the impact of new policies. Unfortunately, USCIS has not published data from November 2025 to January 2026, limiting full assessment of recent developments.

**750,000+**  
people became U.S. citizens  
between January and October 2025

More than 750,000 people successfully became citizens between January and October 2025. Compared to the same period in 2024, applications received in 2025 increased by 6.4 percent, approvals by 5.7 percent, denials rose by a more notable 16.9 percent. While denial rates also fluctuated during the Biden administration, this increase may signal a trend toward higher rates in the future.

### RATE OF NATURALIZATION DENIALS IS OUTPACING INCREASES IN APPLICATIONS AND APPROVALS

#### JANUARY - OCTOBER 2024

**878,685**

apps received

**710,173**

apps approved

**64,038**

apps denied

#### JANUARY - OCTOBER 2025

**935,198**

apps received

↑ **6.4%** from year prior

**750,315**

apps approved

↑ **5.7%** from year prior

**74,842**

apps denied

↑ **16.9%** from year prior



### **NATURALIZATION PROCESSING TIMES ARE BEGINNING TO RISE**

**From October 2024 to September 2025, the average wait time was 5.6 months, compared to 5.0 months in the previous year.**

Wait times have also increased slightly. According to USCIS, the national median processing time for the Form N-400 naturalization application (the time it took to process 50% of applications) from October 2024-September 2025 was 5.6 months, compared to 5.0 months in the previous year. Because adjudication takes months, it may be a while before delays related to recent policies become apparent.

## **LOOKING AHEAD**

Available data from 2025 suggests relative stability in the number of naturalization applications and approvals, though denials have increased. However, these data should be interpreted with caution. Many of the most consequential policy and practice changes affecting naturalization were implemented late in the year or are still in early stages of implementation, meaning their full impact is unlikely to be reflected in current data. In addition, the administration has [proposed](#) significant changes to the Form N-400 naturalization application that would lengthen and complicate the form. If implemented, these changes would increase the time and resources required to prepare applications.

These proposed changes, along with the pause on naturalization adjudications for nationals of travel ban countries, expanded scrutiny, personal investigations, and renewed focus on denaturalization, point toward a significantly different naturalization landscape in 2026.

These developments are likely to increase denials, prolong processing times, and discourage eligible applicants from applying for citizenship. In some cases, heightened vetting and expanded enforcement policies may also expose applicants to a greater risk of referral to removal proceedings, particularly for individuals with prior contact with law enforcement.

Despite ongoing challenges, NAC remains committed to expanding access to citizenship and supporting lawful permanent residents through its network of trusted partners. Learn more about naturalization and find assistance at the [New Americans Campaign](#) website.