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NEIGHBORHOOD SNOOPING: USCIS'S NEW ROADBLOCK TO CITIZENSHIP

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USCIS seems to be obsessed about heightening the good moral character standard for citizenship for the purpose of delay.

On August 19, 2025 USCIS announced that it would evaluate good moral character in the naturalization context to encompass a "holistic assessment of an alien's behavior, adherence to societal norms, and positive contributions that affirmatively demonstrate good moral character".

As if that was not enough to make naturalization more burdensome, on August 22, 2025 USCIS announced that it would resume neighborhood investigations to cover the vicinity of an applicant's place of residence and employment for at least the 5-year period prior to filing the application for naturalization. The authority for conducting neighborhood investigations stems from INA 335(a) to corroborate an applicant's residency, good moral character, attachment to tthe US Constitution and disposition to the good order and happiness of the United States that is prescribed under INA 316. However, the neighborhood requirement under INA 335(a) has long been dormant.

From 1802 to 1981, citizenship applicants were required to present two witnesses who could testify to their qualifications for citizenship. In 1981, Congress eliminated the requirement for witnesses in place of neighborhood investigations, if necessary. But by 1991, the former Immigration and Naturalization Service stopped conducting neighborhood investigations.

USCIS now under the Trump administration is reviving neighborhood investigations to thwart one's path to citizenship. It will make the decision to conduct or waive neighborhood investigations on an individualized discretionary basis after reviewing relevant evidence in the record. This

suggests that an applicant would have to include letters from neighbors and others in the N-400 application in order to stave off a neighborhood investigation. The USCIS guidance on neighborhood investigations states:

USCIS may request information from the alien seeking naturalization to inform its decision on conducting the neighborhood investigation such as testimonial letters from neighbors, employers, co-workers, and business associates who know the alien and can provide substantiated information about the alien, including any of the requirements for naturalization. If such evidence is not contained in the alien's application for naturalization, USCIS may request that the alien submit such evidence. Submitting such evidence proactively with the Application for Naturalization can assist USCIS in determining whether a waiver of a neighborhood investigation is appropriate in a particular case without a need to issue a Request for Evidence.

As explained in our prior blog, the heightened good moral character requirement in the August 19 announcement, and now further elevated in the August 22 announcement, is a significant departure from the previous USCIS policy concerning good moral character. Although the INA does not specifically define good moral character, USCIS had previously held naturalization applicants to the standard of an average U.S. citizen, rather than requiring them to provide evidence of exemplary character or contributions. *See* *In re Mogus*, 73 F.Supp. 150 (W.D. Pa. 1947); *Petition of De Leo*, 75 F. Supp. 896 (W.D. Pa. 1948); and *Matter of Castillo-Perez*, 27 I&N Dec. 664 (A.G. 2019).

The USCIS's basis for finding good moral character in the absence of disqualifying criminal convictions and other adverse factors was practical and made sense as it provided an objective standard for adjudicators to process the application in a streamlined and expeditious manners. Now the requirement to evaluate good moral character based on positive contributions, including corroboration from neighbors, will cause delays and bog down the system. At this time, even under the not too immigrant friendly Trump administration, Form N-400 naturalization applications are processed and approved for the oath ceremony in less than 6 months assuming the applicant meets all the criteria.

Moreover, the whole notion of interviewing the neighbor seems outdated and unworkable. People are mostly anonymized and do not mix with neighbors. In suburban towns, most people drive to and from their homes. There is no village

square or green for neighbors to mingle, dine or dance after work or during the weekends. Even in large cities such as New York where people live in apartment buildings within dense neighborhoods, one hardly knows the neighbor who lives on the same floor. Most people will barely know each other in a large Manhattan apartment condominium, and when they ride elevators, most barely greet each other keeping their eyes fixated on their mobile phone until the end of the elevator ride relieved that they escaped the need to make polite conversation about the weather.

One wonders too how a USCIS investigator conducting a neighborhood visit will breakthrough to a neighbor in a New York building. They will first have to get through security to be allowed to go to the neighbor's apartment or randomly visit several neighbors. How will they knock on all 20 doors on the floor assuming they have passed security downstairs? Would the neighbor who may be accosted in a nightie early in the morning even deign to allow a stranger to visit them to talk about someone they have barely heard of. There is also a danger that the neighbor may have biases, and such a visit would also undermine the applicant's privacy as the neighbor may not have even realized that the applicant was not a US citizen. Consider the scenario where a neighbor, a staunch MAGA supporter, has heard rumors of the applicant's liberal views—this could be seen as a perfect opportunity to undermine them. Additionally, personal grievances could come into play, such as annoyance over noisy children or disputes with a coop board member, if the applicant is one, over increased maintenance fees or carpeting requirements to dampen noise.

The revival of the policy of neighborhood visits appears to be a calculated cynical maneuver by officials in the Trump administration to introduce unnecessary hurdles in the path to U.S. citizenship. This policy not only complicates the naturalization process but also serves as an affront to applicants who have already demonstrated their commitment to the United States through legal channels. By subjecting them to the scrutiny of neighbors—who may harbor biases or personal grievances—this policy risks undermining the fairness and integrity of the naturalization process.

Furthermore, the policy is anachronistic, harking back to a time when community ties were stronger and neighbors were more familiar with one another. In today's urban and suburban environments, where anonymity often prevails, such visits are not only intrusive but also largely ineffective. They place an undue burden on both applicants and their neighbors, who may be

unwilling or unable to provide meaningful insights into the applicant's character.

Ultimately, this policy shift seems less about ensuring the integrity of the naturalization process and more about creating barriers that discourage and delay applicants. It is a disservice to those who aspire to become contributing members of American society and an intrusion into the private lives of individuals.