



CHANGES IN THE USCIS POLICY MANUAL AFFECTING NATURALIZATION

Neighborhood Investigations

By Elizabeth Taufa

I. Introduction

On August 25, 2026, U.S. Citizenship and Immigration Services (“USCIS”) published an update to the USCIS Policy Manual (USCIS PM) entitled “Investigations and Examinations for Naturalization Eligibility.” The update provides guidance on how USCIS will implement its authority in INA § 335 to investigate naturalization applicants (“neighborhood investigations”). This guidance reintroduces the use of neighborhood investigations as part of the naturalization adjudication process. Although USCIS has had authority to conduct neighborhood visits, it has generally waived these visits since 1991. In August of 2025, USCIS announced its intent to resume neighborhood investigations, and for several months afterwards, practitioners in some locations (not everywhere) reported visits of USCIS officers from the Fraud Detection and National Security (FDNS) office to applicants’ homes. While there was no official guidance on which applications were flagged for these investigations, practitioners reported that certain clients with applications for disability waivers (Form N-648) and those who applied for fee waivers were targeted.

The Policy Manual update makes clear that USCIS intends to expand the use of in-person investigations to apply much more broadly in terms of which naturalization applications are subject to the investigations and what the investigations can cover.

II. There is Now a Presumption of a Neighborhood Investigation for All Applications.

The August 2026 USCIS PM guidance specifically asserts the purported authority that USCIS has under INA § 335(a) to conduct in-person investigations for all naturalization applications. Previously, USCIS generally waived these investigations, opting to use background check tools that are commonplace at the agency in lieu of sending an officer to an applicant’s home, neighborhood or employer. Now, under the new policy, the presumption is that a neighborhood investigation will occur. This update applies to all applications that are pending as of August 26, 2026, as well as any applications filed after that date.

III. Waivers of the Neighborhood Investigations Are Still Possible

Section 334(a) of the INA specifically permits waivers of the neighborhood investigations. The USCIS PM update states that waivers of the neighborhood investigation are at the discretion of the adjudicating officer. Specifically, USCIS states that the affirmative submission of two letters in the N-400 packet that are written by non-related individuals connected to the applicant, “preferably” U.S. citizens,¹ could help avoid a neighborhood investigation. According to the USCIS PM, the letter should contain specific examples showing the applicant’s “honesty, integrity and community engagement” and “an explicit statement about the [person]’s moral character and attitude towards the United States and the U.S. Constitution.”² Note that these two additional letters are not required. Rather, USCIS invites applicants to submit them as consideration for whether to waive the neighborhood investigation. It is the client’s choice whether to submit the letters. Whether a waiver of the neighborhood investigation is granted is up to USCIS.

NOTE: It is not clear at which point USCIS will review the file to determine if a neighborhood investigation will be conducted. In the past, USCIS generally did not review a naturalization application before the interview at the USCIS office. It remains to be seen if USCIS adjudicators will start reviewing applications before the interview to determine if a neighborhood investigation will be conducted or if that determination will happen after the regular naturalization interview at USCIS offices.

IV. Neighborhood Investigations Will Include Interviews with People Other Than the Applicant

The updated USCIS PM language lays out the scope of the neighborhood investigations, including who they will seek to interview. Specifically, they will seek out people who can speak to the applicant’s community ties, length of time in the United States, travel abroad, addresses, social activities and associations, marriages and divorces, reputation in the community, criminal history, and more.³ The investigation may also include the applicant’s employer in an attempt to confirm that the applicant is employed and for the duration specified on form N-400. The interview will cover the five-year good moral character time period,⁴ but the guidance states that officers may ask about conduct outside of that five-year period at their discretion.

NOTE: It is unclear what staffing and resources USCIS has to complete in-person investigations on this scale. It is possible that many neighborhood investigations will be waived. Theoretically, if the adjudicating officer at USCIS is satisfied with the documentation that is submitted as part of the application packet, the neighborhood investigation can be waived and the adjudication can continue. However, it is also possible that this new policy will

¹ 12 USCIS PM B.2.4.

² *Id.*

³ A full list of factors that USCIS will seek to examine through a neighborhood investigations can be found in the USCIS PM at Volume 12, Part B.2.

⁴ Some applicants may be subject to a shorter good moral character time period. See, e.g., INA §§ 319, 329.

be used to add another step in an already burdensome and lengthy process and cause further delays. It may also be used as a tool for the agency when there is a political motivation for investigating a certain person or group. In these cases, USCIS officers could conduct a visit and interview the applicant's employer, neighbors, and others, regardless of how many character references are provided as part of the application packet. Practitioners should be sure to explain the risks of this potential political targeting to their clients as they decide whether to move forward with naturalization and whether or not to submit letters.

V. The Actual Impact of These Policy Changes Is Unknown

We don't yet know how this policy will look in practice at USCIS, nor the scale of the impact now that it is in place. Further, we do not yet know how applications that were pending on August 26, 2026, will be treated under this new policy (e.g., receive RFEs or neighborhood visits, etc.). However, it is very likely that adding an in-person investigation to more applications will slow down naturalization application processing even more. This likely means longer wait times for adjudications and interviews and a general slow-down of naturalization.

VI. Preparing Naturalization Applications under This New Policy.

New applicants need to be prepared for the possibility of in-person investigation. Additionally, because this new policy applies to pending applications, those who may have applied months ago might not be approved without a neighborhood investigation or RFE for character references.

1. *Prepare clients for the possibility of a neighborhood investigation:* While we don't know what this new policy looks like in practice, practitioners should prepare clients for the possibility and scope of a neighborhood investigation. Applicants and their representatives should think through whether and how they want to advise their neighbors and employers that an investigation may be conducted without notice to the parties involved. It should be assumed that if an employer or residence is reported on the N-400, that it is possible that it could be the subject of a neighborhood investigation. Applicants and representatives should also consider the effect of a neighborhood investigation in the broader immigration enforcement environment, including what it means for mixed status households and how the presence of USCIS officers could lead to further enforcement actions against those without status. For tools and more information, visit the ILRC's Know Your Rights page.
2. *Decide whether to provide more evidence of good moral character:* Over the course of the last few years USCIS has gradually increased the vetting and background checks for naturalization applicants. This has included asking more in-depth questions at interviews about finances and taxes, marriages, associations and more. The neighborhood investigations are the latest step in the agency's forward march to heighten the good moral character standard for naturalization. As a result, applicants are now faced with a choice of providing additional character evidence at the outset – such as the two letters encouraged by this USCIS PM update—or to file the application as normal and wait to see if they receive a neighborhood investigation or if more evidence is required. Providing the letters proactively is a personal decision, and advocates should discuss

with clients the risks and benefits of providing or not providing this information at the time of filing.

3. Stay informed: At this time, it is still unclear how USCIS will be conducting neighborhood investigations. Stay connected with local immigration advocates, national listservs, and the ILRC as we all learn more about what this guidance will look like in practice.
4. Be prepared for RFEs and NOIDs: Ensure that the relevant address is up to date with USCIS and, if applicable, regularly monitor your or your client's myUSCIS account for RFEs and NOIDs. Under current policy, the amount of time to respond to an RFE or NOID might be truncated. An untimely response can result in denial.
5. Continue screening fully for red flags: This policy update does NOT change anything about eligibility for naturalization. However, it is clear that USCIS intends to do even more vetting and screening of naturalization applications going forward with the ultimate goal, in some cases, of denying the naturalization application and commencing removal proceedings for the applicant if the applicant is deportable. Practitioners should screen potential naturalization applicants with an eye toward this increase in scrutiny and utilize the ILRC's Red Flag Checklist.
6. Remember that risk assessment is personal: Presenting your clients with the scope of risks is necessary for them to make an informed decision about applying for naturalization. Given the current climate that we are in, it may be safer for some LPRs to maintain LPR status rather than naturalizing. On the other hand, others may have pressing reasons to naturalize and are willing to take on more risk.
7. Prepare for an appeal: This is the latest example of USCIS pushing beyond the regulatory, statutory, and case law parameters, especially when it comes to assessments of good moral character. Conclusory denials that fail to assess all the submitted evidence and testimony should be appealed. Naturalization is not a discretionary benefit, despite the agency's attempt to provide more latitude to adjudicators in assessing an applicant's good moral character.⁵ If the USCIS officer fails to consider all positive and negative factors when assessing good moral character, there can be grounds to appeal.

⁵ USCIS lists naturalization as an immigration benefit for which there is no discretion involved. See 7 USCIS PM 8.A (table).



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