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September 24, 2024

Ms. Samantha Deshommes

Chief, Regulatory Coordination Division, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
Camp Springs, MD 20746

Submitted online to <https://www.regulations.gov/commenton/USCIS-2006-0052-0085>

RE: Docket ID USCIS-2006-0052; OMB Control Number 1615-0091; Revision of a Currently
Approved Collection: Application for Replacement Naturalization/Citizenship Document

Dear Ms. Deshommes,

I write on behalf of the New Americans Campaign to applaud USCIS's streamlining of the application for a replacement certificate of citizenship or naturalization, pursuant to the notice of proposed revision published at 89 Fed. Reg. 68461 on August 26, 2024. We support this proposal and encourage adoption of similar improvements to information collections for administration of immigration and naturalization services.

Led by the Immigrant Legal Resource Center, the New Americans Campaign is a diverse nonpartisan national network of respected immigration organizations, legal services providers, faith-based organizations, immigrant rights groups, foundations, and community leaders. The Campaign transforms the way aspiring citizens navigate the path to becoming new Americans. It is committed to connecting lawful permanent residents (LPRs) to trusted legal assistance and critical information that simplifies the naturalization process. Through the Campaign's extensive networks with service providers, immigration practitioners, and naturalization applicants, we have developed a profound understanding of the barriers faced by low-income individuals seeking to obtain naturalization.

Overall, we applaud the agency for reducing the length of the form and making the form easier for applicants and practitioners alike to use. Minimizing categories of information collected on immigration and naturalization forms serves the best interests of all stakeholders, particularly where, as in the present case, users are longtime residents whose personal information is readily available to the agency. Reducing the length and complexity of applications lessens administrative burden, and the risk of error, for applicants, legal service providers, and adjudicators.



The changes to the Form N-565 for replacement of a certificate of citizenship or naturalization that USCIS has proposed are consistent with this best practice and the principles of the Paperwork Reduction Act. We urge the agency to finalize them and use them as a model for updating other immigration and naturalization forms.

In particular, we appreciate:

- The elimination of unnecessary questions about changes in marital status and legal name, the answers to which are apparent from information provided elsewhere;
- The editing of the section about gender changes, to eliminate the requirement or implication of a requirement that a gender change be officially authorized;
- The elimination of requests for mailing addresses for interpreters and preparers, where reliance on digital and phone contact information is appropriate; and
- The revision of certifications to which applicants, interpreters, and preparers sign and attest, to reduce their length and improve comprehension through plain language.

We encourage, and offer our support and technical assistance, to USCIS in carrying forward these principles and reforms in revisions of all of its application forms and other information collection instruments. If we can answer questions or provide assistance, please contact Lucia Martel-Dow, lmartel@ilrc.org.

Sincerely,

s/Lucia Martel-Dow

Lucia Martel-Dow

Director of the New Americans Campaign

Immigrant Legal Resource Center