

ID	Comment.	Commentor	Comment
11	USCIS-2010-0008-0159	Annette Voth	<p>I am an Immigration Caseworker working primarily with lower income clients. I believe this proposed ruling is unnecessary, will cause an additional burden to both the client and immigration caseworkers and will result in no improvement in screening for eligibility for fee waivers.</p> <p>Clients that I work with who receive means-tested benefits are clearly within the income guidelines for fee waivers. This regulation will result in making my job more difficult and time-consuming, will cost both my agency and the client more time and money and is completely unnecessary. Please do not go forward with this proposed ruling.</p>
19	USCIS-2010-0008-0165	Mark Eaton	<p>What is the point of this besides sticking it to low income people? This proposed change would save zero taxpayer money since the money for fee waivers is redistributed from the fees paid by higher-income immigrants (this is a good system).</p>
67	USCIS-2010-0008-0213	Mohamed Abdirahman	<p>Life shouldn't be made hard for the immigrant and refugees as they already experiencing enough difficulties ranging from illiteracy,poverty,trauma and financial hardship.</p> <p>Let us allow them meet American dream and put smile on their face.</p>
83	USCIS-2010-0008-0247	Mackenzie Were	<p>I work in Refugee Resettlement and the change to the USCIS fee waiver policy would significantly affect our clients with undue burden in the process of seeking their lawful right to become a US citizens. These people are coming here legally to flee persecution, war and other hardships and need our assistance to obtain the help they deserve and need to integrate into our society. Thank you</p>
84	USCIS-2010-0008-0236	Medard Ngueita	<p>This change is not rational as it affects those who need it the most and who aren't able to have access to other proof easily than the required proofs.</p>

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96	USCIS-2010-0008-0243	Elijah Knepper	My name is Elijah Knepper. I wanted to comment about the proposed change to the fee waver for green card and citizenship application. This to me disadvantages people who are low income and would become great additions to the US economy. My family had been in the USA since the formation of this country. And I take pride that my family was around to set up one of the greatest countries that allows people who are low income to have a better life and be apart of making America great. Its the diversity of America that makes us strong. Lets continue to allow it to be more diverse, not to hinder the process.
98	USCIS-2010-0008-0230	Christine Turner	I do not support removing the means test. The current per person fee is prohibitive for poor families, and receipt of benefits is a legitimate standard for a fee waiver. Providing other documentation to prove eligibility for the waiver is an unnecessary hardship.
108	USCIS-2010-0008-0258	Alaric Bien	<p>I strongly oppose the proposed changes requiring tax returns alone to verify income for the fee waiver. You KNOW that the people with the lowest incomes often do not file federal tax returns and these are the people who need the fee waiver the most.</p> <p>This is just a continued attack from the current regime to disenfranchise the most vulnerable among us, people of color, the elderly, religious minorities and promote white nationalism. It is shameful.</p>
109	USCIS-2010-0008-0261	Alisse Cassell	I am against oppose the proposed change. Many immigrants with the lowest incomes depend on the current methods to prove their income so they can apply for the fee waiver. USCIS should not make it even harder for people to attempt to become citizens. Please do not make barriers for them to receive a fee waiver for their citizenship application

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115	USCIS-2010-0008-0270	Jordan Goldwarg	<p>As a recently naturalized US citizen, I object to the proposed revision to the fee waiver process. While I was fortunate enough to have enough income to pay the fees associated with my citizenship application, I know that many immigrants who have made substantial contributions to this country do not. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p> <p>Immigrants who are already among the most vulnerable should not be further punished for their poverty. For this reason, I urge you to reject the proposed changes.</p>
157	USCIS-2010-0008-0313	Thomas Todd	I am writing to oppose this rule change. This is just another attempt by this administration to make life more difficult for the less fortunate.
167	USCIS-2010-0008-0308	Karen Gilles	I am writng this comment to oppose changes to fee waiver regulation USCIS 2010-008 Control number 1615-0116 as proposed by the Department of Homeland Security USCIS. Implementation of this regulation would impose undue hardship on people of low income applying for citizenship. Currently applicants can submit evidence of means tested benefits from the state for the waiver. We should retain the current standards for waivers as long as we we impose such high fees for this process. We should not limit the filling out of the citizenship application to only those of means. To become a citizen, the government has more than enough requirements, years of residency and vetting. By narrowing the scope of those who could eligible to complete the long process of citizenship changing the waiver fees regulation, imposes an unfair economic burden on low income applicants.

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217	USCIS-2010-0008-0374	Suzan Bartee	<p>According to the overview of the proposal, "An estimate of the total public burden (in cost) associated with the collection: The estimated total annual cost burden associated with this collection of information is \$1,312,980." Is there a way to quantify the total annual cost benefit associated with this cost of collection of information? This would be an interesting number to tabulate. I would bet that the annual economic contribution the asylee population generates each year far exceeds that number. And that is only considering the economics of this issue.</p> <p>What about the QUALITATIVE data? America is better for having welcomed--and in some cases supported as public charge--each of these people. We the people ARE the government. It's the job of our government to do the will of the people by doing what's best for us as a nation. What's best cannot always be tabulated by quantitative data alone.</p>
277	USCIS-2010-0008-0427	Susan Musinsky	I oppose this proposal. It seems that it would take tremendous time and efforts for low income people to go through this process, thus causing more and more challenges for their road to citizenship.

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282	USCIS-2010-0008-0413	Christina Guros	<p>I oppose US Citizenship and Immigration Services proposed rule change because it would incur undue costs to hundreds if not thousands of nonprofit agencies.</p> <p>Nonprofit legal services agencies have created an informational infrastructure to explain complex immigration laws and requirements to their clients and to the general public. If this change to the fee waiver process were to be implemented these agencies would have to change their informational and educational materials, forms, and websites. These changes incur costs for design, printing and distribution. For example, many nonprofit agencies rely on donated time from website and graphic designers or pay contractors to update their website information, promotional materials and educational handouts periodically. These contractors or volunteer designers would need to be rehired to develop new materials to reflect the changed fee waiver requirements. This is an additional cost for which nonprofit agencies, organizations that are federally tax exempt because they do not earn profit, have no budget.</p> <p>This rule change would also require that all client letters and lists that detail the documents to bring to an appointment or legal assistance event as evidence for a fee waiver would need to be changed. At most legal services agencies, the lists for fee waiver evidence are embedded in lists of materials to bring for each specific case type. For example, when first meeting with a client during a brief intake interview, I would learn her basic immigration background and the immigration benefits she sought, and assess her basic eligibility for those benefits. For someone interested in applying for citizenship, I would hand her a list of documents to bring to her next appointment to show her eligibility for citizenship, which included the documents she would bring to be eligible for a fee waiver. If this rule were to pass, I would need to update my list of required documents for naturalization, green card renewals, asylee adjustments, Temporary Protected Status renewals, etc. So the list for each and every case type for which a fee waiver is an option would need to be updated, requiring staff time for updates, and the costs of reprinting materials that were previously printed.</p> <p>Agencies that train legal service providers and volunteers on the requirements and procedures for various form types would need to update all instructional materials, including previously recorded webinars, videos, slides and training handouts published online, training curricula, textbooks and manuals. Nonprofits who rely on these training materials would need to purchase new manuals with updated information about the fee waiver process. Legal manuals are notoriously expensive.</p> <p>This proposed rule change makes no mention of the additional costs to nonprofit agencies that provide legal assistance to immigrants and refugees, nor who would be liable for these costs. Without mention, it can only be assumed that these agencies would have to find additional donations or foundation support for updating materials. This is an unnecessary burden on tightly budgeted nonprofit organizations, and for this reason, and many more I oppose the proposed fee waiver rule change.</p>
287	USCIS-2010-0008-0424	Yinfang Li	<p>Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p>
291	USCIS-2010-0008-0412	Heidi Tobaben	<p>I oppose the proposed revision. Immigrants with the lowest incomes, including the elderly, often rely on fee waiver in order to achieve citizenship. Changing the verification requirements would make it incredibly difficult and in some cases impossible for many of them to prove they are eligible for the fee waiver.</p>

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293	USCIS-2010-0008-0421	Abe Fleischer	<p>This proposal unfairly targets our country's most vulnerable, those who need our help to fully establish their lives here and give their all to our country.</p> <p>Immigrants are some of our biggest patriots because they choose to live here. They work hard, bring new ideas, and make our country more interesting and stronger. We need to remove barriers that inhibit them from starting their lives here.</p>
294	USCIS-2010-0008-0436	Sumayta Magwood	<p>Im oppose to this bill, it will affect lots of low income, who didnt choose to be in band financial situations, and Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p>
325	USCIS-2010-0008-0473	Libby Palmer on behalf of the Jefferson County Immigrant Rights Advocates (JCIRA),	<p>I am writing on behalf of the Jefferson County Immigrant Rights Advocates (JCIRA), a WA state non-profit organization. We oppose the DHS, USCIS proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Our organization (JCIRA) helps immigrants with legal issues by referring them to other sister non-profit organizations in the state of Washington. Most of our clients are low-income, gainfully employed people in the service trades. The fees currently demanded by USCIS for so many applications are beyond their reach. The present fee waivers have been essential for their pursuit of justice and progress. Many of our clients will have heard about the fee changes and may, in fear and desperation, decide to forego applications for which they qualify. This proposal will also place a time and resource burden on people who apply for fee waivers.</p> <p>JCIRA urges you to withdraw all proposed changes in waiver fees.</p>

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754	USCIS-2010-0008-1109	Karin Guros	I oppose the fee waiver regulation changes because they are causing unnecessary obstacles for eligible families and extra expenses for the agencies processing them. They serve no purpose except to obstruct the process and make deserving families suffer and cause further bureaucratic delays. This change will affect people in my immediate community as well as other neighborhoods where I have worked and volunteered.
759	USCIS-2010-0008-1133	Jose Gomez	<p>I am commenting on this issue because I have personally seen how difficult and intimidating these government forms can be and it would push many eligible candidates away. These people have the right to seek a path to citizenship without these obstacles that aren't necessary and basically excessive. People deserve more support rather than additional fees and punishments.</p> <p>Immigrants are the backbone of this country. Many of the hard labor jobs are done by hard working immigrants. These people deserve more support and encouragement.</p>
760	USCIS-2010-0008-1113	Ellen Struve	Taking away this criterion will make it harder for vulnerable and low-income immigrants to become U.S. citizens and will inhibit the future economic growth of our country. I oppose this action.
761	USCIS-2010-0008-1047	John Guros	the revision of form I-912 is a waste of time, money, and flies in the face of everything the immigration process should be. low income people will have very little way of establishing eligibility. hard working people, with limited resources, will be further taxed in their attempt to remain. attacking the backlog that already exists would be a far better task for USCIS. making the job of agencies currently helping immigrants navigate the naturalization process. is a waste of time, resources, and the true American spirit. Thank you

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775	USCIS-2010-0008-1035	Youngja Kim	Many immigrants are greatly in need of a fee waiver and there shouldn't be financial barriers to attaining citizenship or regal status. Immigrants come to this country for better life and it is an American ideal to be land of opportunity. Thank you for consideration of this perspective.
799	USCIS-2010-0008-1078	Upama KC	I do not support the proposed revision of the fee waiver because it adds burden to agencies like ours that help clients naturalize. We work together with clients to gather documents needed to complete the naturalization application. With the proposed changes, we will need to spend more time finding documents to apply for the fee waiver. It can significantly reduce the capacity of organization like ours that try to help the most vulnerable people in our community.
819	USCIS-2010-0008-0862	Merrilanne Roney-Thach	<p>I strongly oppose the proposed Fee Waiver rule because it unfairly burdens those who are least able. The system is already overly complex and difficult to navigate. If we want people to comply with our laws and maintain a legal status, we need to make it possible for them to do so.</p> <p>Many years ago my husband and I adopted our children from Thailand. We remember how complex and time consuming the process was to apply for a legal status.</p> <p>We are college educated and English is our primary language. We can only imagine how overwhelming this task must be for those who are new to our country and have limited resources.</p> <p>Please withdraw this proposed revision to Form I-912.</p> <p>Sincerely,</p> <p>Merrilanne Roney-Thach</p>

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832	USCIS-2010-0008-0938	Gabriel Ferrante	This proposed policy is unjust, and discriminates against those members of the immigrant community who are most in need of the support of the community to get back on their feet. Our society and our economy are better, rather than worse off, when no one is forced into desperation, and when all those who have chosen to come to America know that we welcome them and value their contribution to the Nation.
1118	USCIS-2010-0008-1238	Amur Ahmed	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1138	USCIS-2010-0008-0608	Sonya Chung, Minkwon Center for Community Action	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>MinKwon Center regularly holds workshops for clients, especially for those who are unable to miss work during the regular work week for economic reasons. The efficiency and ease of the fee waiver application is crucial for us to effectively assist clients in these settings. Also, as the majority of clients at the MinKwon Center use fee waivers for their immigration applications, the proposed changes would very likely reduce the number of clients we serve. The clients themselves are the most impacted by this proposed change. However, as an organization primarily funded by various grants, MinKwon Center would also be negatively affected by the changes in the fee waiver policy because we would not be able to serve as many clients and potentially lose the funding streams that support our work in the community.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p>

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1157	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 10: IV. The Proposed Form Change Would Increase the Burden on Legal Service Providers and Reduce the Availability of Legal Services</p> <p>The proposed changes will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, the changes will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. The proposed changes will limit the number of individuals whom immigration support organizations will be able to assist. Under the proposed form change, service providers will need to take a longer time explaining and assisting an applicant through the new process, including guiding applicants through the process of finding the new supporting information. Further, service providers will need to dedicate their limited time and resources to revising materials, procedures, and service models, as opposed to serving clients who most need their help.</p> <p>A. Under the Proposed Form Change the Number of Individuals Who Can be Served Through the Workshop Model Will Be Reduced</p> <p>Currently, non-profit immigration legal service providers organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because having qualified attorneys and DOJ representatives provide legal services, including in remote areas of the United States that have few legal resources, allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Because workshops depend on having a streamlined process, and on having applicants provide all needed documents to the workshop, the proposed changes will confuse and frustrate individuals who do not have or know about the documentation required to qualify for a fee waiver. Legal service providers will face resource constraints in helping individuals provide significant documentation to prove their</p>

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1162	USCIS-2010-0008-1101	Sharone Kaufman, Catholic Migration Services	<p>Comment part 3: Burden on the Legal Community</p> <p>This proposal is in direct contravention of the Paperwork Reduction Act, as applicants and legal providers would have to submit more documentation to prove eligibility for a fee waiver. Advocates will be forced to turn away applicants who cannot produce the documents and will also have to create packets that meet the financial hardship standard, a standard that is vely high and requires voluminous documentation. This will limit the ability to organize naturalization workshops and increase the time that creating a filing will take. In addition to burdening the applicants and the legal advocates that help prepare fee waivers, eliminating the means-tested benefit component will further burden USCIS employees who make decisions on fee waivers, Because fee waivers based on financial hardship require extensive documentation and explanation, USCIS will have more evidence to review for each fee waiver.</p> <p>Conclusion</p> <p>It is not in anyone's interest — applicants, advocates and USCIS itself — to create the unnecessary step of limiting the fee waiver categories in existence, The form itself could be improved as the current 1-912 is unwieldy and long, yet eliminating the rmeans tested benefit category is not the answer. We therefore respectfully ask USCIS to reconsider this proposal carefully and to decline to implement it.</p> <p>Respectfully submitted,</p> <p>-</p> <p>Sharone S. Kaufman Managing Attorney- Immigration Unit Catholic Migration Services 191 Joralernon Street, 4th Floor Brooklyn, New York 11201</p>

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1164	USCIS-2010-0008-1118	Laura Vazquez, UnidosUS	<p>Comment part 3: Negative Impact on Legal Service Providers</p> <p>All the UnidosUS Affiliates that provide immigration legal services assist applicants who file fee waiver applications; in fact, Affiliates report that most of the clients they serve are low income individuals who qualify for an application fee wthver. We have already heard from Affiliates that if the proposed rule were to go into effect, this would significantly increase time spent on each case and result in them being able to see fewer applicants.</p> <p>2</p> <p>If service providers have to spend more time on each case because of increased evidentiary burden imposed by this rule, this would lead to them having to turn some clients away. As a result, there would be reduced access to qualified legal service providers and could drive people to see fraudulent providers countering the interest of USCIS in combatting immigration scams</p> <p>Conclusion</p> <p>USCIS claims the proposed changes will standardize the process of requesting a fee waiver. Instead, the proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form 1-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>UnidosUS strongly opposes the Department's plan to stop accepting receipt of a means-tested benefit as evidence that a person qualifies for an application fee waiver. We are gravely concerned that the proposed rule threatens the ability of immigrants to apply for a fee waiver that they are eligible to receive and therefore impedes them from applying for naturalization. A reduction in naturalization rates would cause all Americans to lose the economic and social benefits of naturalization. We urge the Department to abandon this proposed rule and instead</p> <p>expand the types of documentary evidence accepted in order to establish eligibility for a fee</p>

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1171	USCIS-2010-0008-0968	Tana Liu- Beers, Disciples Immigration Legal Counsel	<p>Comment part 4: The proposed changes would place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes would increase the burden on nonprofit legal service providers and limit access to immigration legal services for individuals in need. Many nonprofit immigration legal services provides help underserved populations through naturalization workshops. Workshops are helpful to both applicants and USCIS because they minimize errors and reduce the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it would become harder for nonprofits and volunteer attorneys to complete applications in a workshop setting. Organizations may stop providing assistance with fee waivers in the workshops, thereby cutting off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or hard-to-reach areas.</p> <p>The proposed changes to fee waiver application requirements would affect many in our Disciples churches, including our pastors and seminarians. They would make it harder—and in some cases impossible—for families to apply for immigration benefits and naturalization. Our churches would suffer as our members were kept from obtaining status and participating as full citizens of society. For these reasons, Disciples Immigration Legal Counsel strongly opposes the proposed changes to the fee waiver requirements.</p> <p>Sincerely, Tana Liu-Beers, Esq. Disciples Immigration Legal Counsel</p>

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1173	USCIS-2010-0008-0886	Michelle Carey, The Los Angeles Center for Law and Justice	<p>Comment part 2: I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form 1-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form 1-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to</p>

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1185	USCIS-2010-0008-0763	Patti Seger on behalf of End Domestic Abuse Wisconsin, the Wisconsin Coalition Against Domestic Violence (End Abuse)	<p>Comment part 5: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create insurmountable barriers for many people seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours, Patti Seger Executive Director End Domestic Abuse WI</p>

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1202	USCIS-2010-0008-0956	Zenobia Lai, Catholic Charities - Houston	<p>Comment part 5: V. The Proposed Changes Will Place a Time and Resource Burden on Legal Service Providers and Reduce Access to Legal Services, Especially in Under-resourced Locations.</p> <p>The proposed revision will also increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits.</p> <p>Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes those unlicensed to practice law to exploit the immigrant community through fraud and deception. With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas. Catholic Charities is among the organizations utilizing the workshop model in order to provide the greatest impact in provision of naturalization as well as other immigration services. The most common reason for an individual to need follow-up assistance after a workshop is due to a rejected fee waiver. Increasing the documentary requirements for a fee waiver will only increase the time dedicated to this follow-up which directly reduces the number of individuals whom we can serve. The ones who will be most impacted will be the most vulnerable populations who are unable to either pay the immigration fee or obtain assistance in obtaining a fee waiver.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed change, to work instead of expanding the types of documentary evidence accepted to establish fee waiver eligibility in order to ensure fair and efficient adjudication of immigration benefits. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Should you have any questions, please do not hesitate to contact the undersigned at (713) 874-6570.</p> <p>Thank you for your attention.</p> <p>Sincerely, Zenobia Lai, Legal Director Crystal Ortega, Senior Attorney St. Frances Cabrini Center for Immigrant Legal Assistance</p>

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1217	USCIS-2010-0008-1004	Molly Coe, Volunteers of Legal Service	<p>Comment part 5: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Respectfully submitted, Elizabeta Markuci, Project Director, and Molly M. Coe, Staff Attorney Immigration Project, Volunteers of Legal Service</p>

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1219	USCIS-2010-0008-0738	Sarah Peterson, The Washington State Department of Social and Health Services (DSHS)	<p>Comment part 3: Furthermore, Washington estimates that it would lead to increased costs on our state, by further straining the time and budgets of DSHS contractors and other service providers as they meet with clients and spend more time trying to rectify all of the denied applications. We fully anticipate the increased complexity in the documentation will lead to an increase in Fee Waiver denials. This will not only delay the processing of the application pending (e.g., N-400 Citizenship Application), but it also requires providers to offer more services to resubmit applications. Individuals unable or unwilling to resubmit the I-912 form may ultimately request that the State of Washington cover the cost of the application. As a result, ORIA's programs will likely see an increase in the cost to the program to cover N-400 application fees and to resubmit denied applications. From 2013 to 2016, USCIS denied between 16 and 20 percent of Fee Waiver applications.¹ If ORIA's Naturalization Services Providers submit 1,645 each year, at the current rate of denials, the State of Washington could pay \$190,820 to \$238,525 annually to cover the cost of applications. This is an additional and unnecessary cost shift to the state.</p> <p>Contractors and other immigration service providers will need to spend time and money training their staff on the new Fee Waiver applications and what financial documentation is acceptable. Since there is no additional funding for ORIA to cover this increased burden, this will place an additional strain on their financial resources. A portion of their existing budget, which currently goes to support other programs and services, will need to be diverted to cover the training and service hours for this change in policy. Many providers will turn to ORIA's program manager that oversees the contract and policies for the Naturalization Services Program. Additional training, technical assistance, and requests to cover the costs of the application will increase the workload for the program manager. DHS does not account for these costs associated to providers and to DSHS that would be associated with the policy change.</p> <p>Revising Form I-912 to not accept proof of receipt of public benefits will not increase the quality, utility, or clarity of the information that USCIS collects. It will needlessly increase the burden of collecting information on the people and the State of Washington. As a result, DSHS strongly opposes the proposed revision, and urges that it be withdrawn.</p> <p>Sincerely yours, Sarah Peterson Office Chief, Office of Refugee and Immigrant Assistance Community Services Division, Economic Services Administration</p>
1231	USCIS-2010-0008-0779	Melissa Mora, Neighborhood Defender Service of Harlem	<p>Comment part 5: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in underresourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service</p>

ID	Comment.	Commentor	Comment
1236	USCIS-2010-0008-1003	Margaret Russell on behalf of Mid Minnesota Legal Aid (Legal Aid)	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>These changes would mean that Legal Aid attorneys and volunteer attorneys would need to spend a significant amount of additional time with each client in preparing their fee waiver request. Whereas in the past it required about ten minutes total in filling out the form, having the client sign a release and faxing the request for proof of receipt of public benefits, under the proposed rule, it will require an hour or more in preparing fee waiver requests under the proposed rule. There is a huge demand for legal assistance and Legal Aid already turns away many people who qualify and are eligible for help. This rule would result in more people needing the help of an attorney or accredited representative in order to prepare and provide supporting documentation for a fee waiver request. It would result in Legal Aid being able to serve fewer people due to the increased time it would take to prepare the fee waiver requests.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours, Margaret Hennessy, Staff Attorney Margaret Russell, Managing Attorney Immigration Law Project Mid Minnesota Legal Assistance</p>

ID	Comment.	Commentor	Comment
1237	USCIS-2010-0008-1013	Yadira Chavez, On The Move/Citizenship Legal Services	<p>Comment part 2:I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individuals’ applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be insuperable obstacle for an immigration benefit or naturalization application. Any opportunity to alleviate the costs associated with filing should be designed to ease, rather than aggravate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents. Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship. Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. By limiting the ways, a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p> <p>As an organization that works closely with both legal services providers and USCIS, we do not believe that the proposed rule will reduce USCIS’s investment of time or</p>

ID	Comment.	Commentor	Comment
1241	USCIS-2010-0008-1013	Yadira Chavez, On The Move/Citizenship Legal Services	<p>Comment part 6: III. The proposed changes will place a time and resources burden on legal services providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee to apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>CLS encourages DHS and USCIS to take a stand of inclusivity when making changes to the fee waiver eligibility criteria. CLS is a highly trusted and well respected collaborative in Napa. Immigrants seek our services because they know we are accurate, timely and responsible. The proposed changes would increase the workload tremendously, instead of providing immigration services, we will have to switch our attention to contacting the IRS and other non-immigrant centers. This takes time away from being able to serve clients and offer immigration remedies. These proposed changes will directly inhibit our ability to provide low-cost immigration services with increased time spent of completing documentation with the proposed changes we will need to hire more staff and work more hours in order to keep up with all documentation needed to file. Instead of spending our time emailing and calling agencies to obtain extra unnecessary documentation for the proposed changes, we would rather spend time educating our immigrant community on the immigration benefits that already exist.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers to those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring</p>

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1259	USCIS-2010-0008-1099	Marjean Perhot, Catholic Charities Archdiocese of Boston	<p>Comment part 4: THE PROPOSED CHANGE WILL INCREASE THE BURDEN ON VULNERABLE INDIVIDUALS APPLYING FOR IMMIGRATION BENEFITS AND LEGAL SERVICE PROVIDERS</p> <p>Our agency serves the most vulnerable members of our society, including victims of domestic violence, trafficking and other serious crimes. The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete the form and gather the additional required documentation. Many of these individuals may be unable to meet the stricter evidentiary requirements and could be deterred from applying for immigration benefits. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for vulnerable individuals.</p> <p>In addition, the proposed change would also increase time demands for legal service providers, like ourselves, who often are already overstretched for providers of legal assistance due to lack of adequate funding for the community needs. We believe that the proposed change, if implemented, would increase our workload and make it more difficult to see and assist the number of applicants we represent currently. This would be a trend among legal service providers and would therefore result in decreased capacity for many pro bono and low-cost legal service organizations and increased number of pro se applicants, ultimately leading to a higher number of rejections and resubmissions for Fee Waivers and other types of applications, adding to an already saturated backlog of submissions to USCIS. For the reasons described above, we reiterate our strong opposition to USCIS's proposed change on fee waiver eligibility criteria, USCIS Docket ID USCIS -2010-0008, OMB Control Number 1615-0116.</p>

ID	Comment.	Commentor	Comment
1263	USCIS-2010-0008-1073	Miko Tokuhaman Olsen on behalf of Legal Aid Society of San Diego, Inc.	<p>Comment part 5: The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Kind regards,</p> <p>LEGAL AID SOCIETY OF SAN DIEGO, INC.</p> <hr/> <p>Miko Tokuhaman-Olsen Senior Attorney, Individual Rights Team</p>

ID	Comment.	Commentor	Comment
1268	USCIS-2010-0008-1020	John Keller on behalf of the Immigrant Law Center of Minnesota	<p>Comment part 5: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>ILCM serves the highest number of low-income immigrant and refugee clients in the State of Minnesota. Despite a staff of 32 persons, 5 offices across the state, and over 250 pro bono attorneys, we cannot meet the need and maintain multiple unique waiting lists. Our legal staff are incredibly skilled and efficient after years of work. Our most experienced immigration attorney has more than 30 years of working in the field. We have no doubt that these changes will add hours to many of our cases and our staff. Each additional hour of work per case makes our waiting lists longer and delays the positive benefits and integration we can help our clients achieve.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p>

ID	Comment.	Commentor	Comment
1277	USCIS-2010-0008-1107	Omar Carrera on behalf of Canal Alliance	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>Canal Alliance is able to provide the services it does in part thanks to the grants it receives to provide services to clients of low-income. If our employees' workload increases it would greatly impact the number of clients we would be able to serve. If our numbers diminish our grants may suffer as we may not be able to meet the required deliverables and therefore we may run the risk to cut down our services even more.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours,</p>

ID	Comment.	Commentor	Comment
1299	USCIS-2010-0008-0971	Vaughn Cox, La Union del Pueblo Entero (LUPE)	<p>Comment part 4: 111. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Si ,erelyy6urs, 2 1:faughtf Cox a< Finance Manager La Union del Pueblo Entero P.O. Box 188</p>

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1306	USCIS-2010-0008-0768	Koula Glaros- King, Community Legal Aid	<p>Comment part 4: III.The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Current processing of fee waiver requests already cause extraordinary hardship with delays of up to 75 days for USCIS receipts. These delays have been especially difficult for our clients seeking new employment, enrolling in higher educational programs, purchasing homes or vehicles, and renewing state driving licenses and IDs. While waiting for receipts on timely-filed applications, our clients have lost jobs, educational opportunities, deposits for cars, and housing. They have also been forced to risk driving with expired licenses. Adding to the time necessary to seek the new fee waiver requests only adds to this burden and amplifies the adverse consequences of such delays on immigrant families. The burdens of the proposed change fall squarely on those least able to carry them. Immigrants came to the United States to fully participate in Arnerican life. The proposed changes to the fee waiver eligibility criteria and the accompanying increased evidentiary burden on applicants will create barriers for those seeking to secure their hnrnigration status, live together in their communities, and naturalize. We urge USC1S to work to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming linmigrants.</p>

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1307	USCIS-2010-0008-0768	Koula Glaros- King, Community Legal Aid	<p>Comment part 5: IV. USCIS must keep not lose the true purpose of the Fee Waiver Request. We ask that USCIS keep paramount the purpose of this form. Its intended purpose is presented as a humanitarian consideration for those with limited finances. Its intended purpose should never be a business purpose that forces people to pay even though they may be eligible for waived fees. Instead, we propose that Form 1-912 be evaluated for real effectiveness in helping those with limited or no financial resources. The proposed version of the Fee Waiver Request and its instructions unnecessarily burdens USCIS as well as our particularly vulnerable impoverished clients. It does not improve consideration of a Fee Waiver Request; instead it creates even more barriers to its intended humanitarian use.</p> <p>Koula E. Glaros-King Attorney, Community Legal Aid</p>

ID	Comment.	Commentor	Comment
1317	USCIS-2010-0008-1002	Peggy Russell, on behalf of Mid Minnesota Legal Aid (Legal Aid)	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services. With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>These changes would mean that Legal Aid attorneys and volunteer attorneys would need to spend a significant amount of additional time with each client in preparing their fee waiver request. Whereas in the past it required about ten minutes total in filling out the form, having the client sign a release and faxing the request for proof of receipt of public benefits, under the proposed rule, it will require an hour or more in preparing fee waiver requests under the proposed rule. There is a huge demand for legal assistance and Legal Aid already turns away many people who qualify and are eligible for help. This rule would result in more people needing the help of an attorney or accredited representative in order to prepare and provide supporting documentation for a fee waiver request. It would result in Legal Aid being able to serve fewer people due to the increased time it would take to prepare the fee waiver requests.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary</p>

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1329	USCIS-2010-0008-0928	Joomi Kim, Korean Community Service Center	<p>Comment part 4: D.The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our countrys commitment to welcoming immigrants.</p> <p>In conclusion, we urge you to take back this rule and preserve existing methods of proving eligibility for the fee waiver. This new policy on fee waivers will further burden the millions of lawful permanent residents (LPRs) who are eligible for citizenship, the vast majority of whom do not apply due to various barriers, including cost.</p> <p>This deterrent effect would also block individuals, as well as entire communities, from the benefits associated with naturalization. Naturalized citizens earn 8-11 percent more in ages (an average of approximately \$2,200 per year) compared to eligible LPRs who dont naturalize. Naturalizing has been shown to double someones likelihood of owning a home, and by doing so, strengthen their local housing market and tax base.</p> <p>Best,</p> <p>Joomi Kim Executive Director Korean Community Service Center 22727 Hwy 99 suite 212 Edmonds, WA 98026</p>

ID	Comment.	Commentor	Comment
1337	USCIS-2010-0008-1007	Salvador Sanabria, Salvadoran American Leadership and Educational Fund	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours,</p> <p>Salvador Sanabria Executive Director of El Rescate ssanabria@elrescate.org</p>

ID	Comment.	Commentor	Comment
1343	USCIS-2010-0008-1014	Barbara J. Parker on behalf of the City Attorney and Mayor for the City of Oakland	<p>Comment part 2: A. The Proposed Rule Will Be an Administrative and Financial Burden.</p> <p>While USCIS claims that the proposed rule will streamline its review of fee waiver requests, this proposal will in fact increase the administrative burden on USCIS, other government agencies, and applicants. By eliminating the means-tested benefit method of eligibility determination, USCIS will be forced in practice to determine each applicant's eligibility on a case-by-case basis. In cases in which an applicant has already been deemed eligible for a means-tested public benefit, that individual has already been rigorously evaluated by the federal or state agency that awards such benefits—meaning USCIS will be duplicating efforts. Further, the proposed rule will increase the administrative and financial burden on applicants, making them less likely to seek immigration benefits like naturalization. Under the current system, an individual may prove their eligibility for a fee waiver by providing a current award letter describing their receipt of a means-tested benefit.</p> <p>11 By contrast, the proposed rule limits eligibility to individuals who earn 150% or less of the federal poverty level, or experience financial hardship, which would require substantially more documentation—including federal tax returns and receipts.</p> <p>12 The financial burden that will be imposed by the proposed rule change is also significant for the applicant. It currently costs \$640 to apply for naturalization, and \$1,140 to apply for a Green Card.¹³ Applicants must also pay an additional \$85 biometric fee for either application.¹⁴ By one estimate, the proposed rule would reduce by two-thirds the total population eligible for fee waivers. As fees increase and waivers become inaccessible, many otherwise eligible immigrants will be unable to seek citizenship or immigration benefits.</p>

ID	Comment.	Commentor	Comment
1344	USCIS-2010-0008-1014	Barbara J. Parker on behalf of the City Attorney and Mayor for the City of Oakland	<p>Comment part 3: B. California and Oakland Residents Will Be Particularly Harmed By The Proposed Revision.</p> <p>In California, the threshold to claim a state means-tested benefit differs from the current federal guidelines. Under the proposed federal standard, an individual must have income below 150% of the Federal Poverty Guidelines; in California, individuals with incomes below 200% of the Federal Poverty Guidelines may receive means-tested benefits.¹⁶ This difference is in part because the cost of living continues to rise in California, and in part because the federal standard is unrealistically low. The proposed rule does not address this inconsistency, the harm that might arise from this discrepancy, or the fact that any differences may simply reflect cost-of-living variations among states.</p> <p>The proposed rule has important implications for residents of California cities who have little room in overstretched family budgets. For example, in Oakland median rents have risen significantly, far outpacing the increase in household incomes.¹⁷ For low wage earners, \$725 can be the difference between making monthly rent or taking care of other necessities such as food and clothing. The proposed rule will place low-income immigrant families in a difficult situation—choosing between long-term stability and short-term needs.</p> <p>II. Conclusion</p> <p>The proposed rule will discourage immigrants from pursuing immigration benefits, including naturalization, thereby harming this population and Oakland’s community as a whole. USCIS should not remove the means-tested benefit category from form I-912, and should instead work to truly streamline its processes and increase the ability of eligible immigrants to apply for citizenship.</p> <p>Very truly yours,</p> <p>6/1</p>

ID	Comment.	Commentor	Comment
1349	USCIS-2010-0008-1017	Salvador Sanabria	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours,</p> <p>Salvador Sanabria Executive Director of El Rescate ssanabria@elrescate.org</p>

ID	Comment.	Commentor	Comment
1351	USCIS-2010-0008-1021	Christine Chen, Asian Americans Advancing Justice - Los Angeles	<p>Comment part 3: II. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in underserved and underresourced API communities.</p> <p>The proposed changes will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers such as Advancing Justice - LA organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for Advancing Justice - LA to complete applications in the workshop setting. Currently, applicants bring personal documentation to these events, complete N-400s one section at a time, with the guidance from expert staff and immigration attorneys. A majority of the applicants we assist at group workshops qualify for fee waivers and the majority of them use means tested benefits to prove their inability to pay the naturalization fee, which has increased 600% since the 1990s. Applicants can quite easily find and bring this proof to a workshop, but are far less likely to assemble complete evidence of income, including tax transcripts, before consulting our experts. As a result, requiring tax transcripts will effectually extend the time and resources to having applicants complete these forms because now they will have to take additional steps to obtain such documentation and additional staff time to interpret these tax forms, which may require multiple follow up appointments. This is not possible for many of our workshops and clinics done offsite in public spaces. A large proportion of the population we serve do not have access to a computer or internet, let alone have an e-mail address. A seemingly simple task such</p>

ID	Comment.	Commentor	Comment
1357	USCIS-2010-0008-1022	Laura Flores- Dixit, California Rural Legal Assistance Foundation	<p>Comment part 4: III. The proposed changes will place a time and resource burden on CRLA Foundation as a legal service provider and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers, such as CRLA Foundation, to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, CRLA Foundation organizes naturalization and citizenship workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers, such as CRLA Foundation, to complete applications in the workshop setting. If the time spent on filling out fee waiver requests becomes so significant that participants in the workshops are underserved in other areas, then organizations may stop providing fee waiver assistance in the workshop setting or will have to significantly limit the number of individuals they are able to serve. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas. Thus, the proposed order would inevitably cause chilling effects on many immigrants seeking to use the legal services provided by CRLA Foundation workshops.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. CRLA Foundation urges USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p>

ID	Comment.	Commentor	Comment
1360	USCIS-2010-0008-1027	Rachel Odio, Public Counsel	<p>Comment part 4: The proposed changes are unreasonably burdensome on applicants, legal service providers and community organizations, USCIS, and other government agencies such as the IRS. As explained above, the proposed changes will inevitably require the investment of additional time and resources at every stage of the process, from preparation through adjudication. These burdens and delays may have serious consequences. Many vulnerable community members will be discouraged from applying for immigration benefits because they cannot afford the fees and find the new fee waiver process too challenging. This discouraging effect will disproportionately impact the most vulnerable populations, including survivors of sexual assault, human trafficking, domestic violence, and other traumas— populations which are likely to suffer economic abuse in addition to physical and psychological trauma. Applicants who are illiterate, speak rare indigenous languages, live in remote areas, cannot afford to take time off of work, or face other challenges are also likely to be affected by these unnecessary changes to the fee waiver process. Delays and barriers to fee waivers can mean delays and barriers to employment authorization, in addition to immigration benefits. Thus the delays and resulting decisions not to apply can have serious consequences not only on the applicants and their families, but also on their local communities and the national economy.</p> <p>Unfortunately, the increased burden on legal service providers and community organizations may also mean a reduction in access to immigration legal services. As the time and resources required to assist with fee waiver requests increase, organizations may be forced to reduce the number of clients served, the types of services provided, or the programs funded. In other words, the increased burdens of the proposed changes will mean fewer people can prepare fee waiver requests without assistance, yet legal service providers and community organizations will be able to assist fewer clients, provide fewer services, or fund fewer programs due to the increased costs of assistance with fee waiver requests.</p> <p>We strongly urge you to reject the proposed changes and instead expand the types of</p> <p>documentary evidence accepted for consideration for fee waivers</p>

ID	Comment.	Commentor	Comment
1363	USCIS-2010-0008-1033	Monica Glicken, Public Law Center	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers like PLC, and would result in limiting access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers like PLC organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. PLC strives to organize such workshops in underserved areas of our target service area, in order to increase access to legal help to those communities. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become significantly harder for non-profit legal service providers to complete applications in the workshop setting. Due to the additional burdens in completing the Form I-912 and obtaining appropriate documentation, PLC and other non-profit legal services providers may have to stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in hard-to-reach areas. PLC would likely see a significant reduction in the numbers of individuals we are able to assist, including several hundreds of lawful permanent residents that we assisted over the past year in applying for naturalization with a fee waiver.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create significant, even unsurmountable barriers for those seeking to secure their immigration status, remain with their families and communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS not to implement the proposed rule change, but instead to expand the types of documentary evidence that can be accepted in order to establish eligibility for a fee waiver. We urge USCIS to make access to fee waivers less burdensome and bureaucratic, in order to promote the fair and efficient adjudication of immigration benefits and naturalization.</p> <p>Sincerely,</p> <p>Monica Glicken Directing Attorney, Immigration Unit</p>

ID	Comment.	Commentor	Comment
1380	USCIS-2010-0008-1056	Leah Engle, Kentucky Equal Justice Center	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country’s commitment to welcoming immigrants.</p> <p>Sincerely yours,</p> <p>Leah Engle Program Director, Maxwell Street Legal Clinic Kentucky Equal Justice Center</p>

ID	Comment.	Commentor	Comment
1386	USCIS-2010-0008-1067	Tamara Shehadeh- Cope, Community Justice Project	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes would also have a detrimental impact on many non-profit organizations and the number of clients that they are able to serve. CJP is an organization with very limited resources, and the increased time that would have to be dedicated to complying with the proposed changes to the fee waiver would mean less time to dedicate to serving clients who are in need of our services. For many of our clients, these delays in their cases could be the difference between having safety and security, and not. Furthermore, we rely on grant funding that look closely at the work that we do with immigrant survivors, and on the impact that we are having on these communities through representation. With these proposed changes, our ability to assist and provide our trauma-informed services will be compromised.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p>

ID	Comment.	Commentor	Comment
1392	USCIS-2010-0008-1074	Emily Leung, Justice Center of Southeast Massachusetts LLC	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization.</p> <p>The proposed changes would increase our own attorneys' workload, and would ultimately limit the number of clients we are able to serve. By creating a more complex process to demonstrate our low-income clients' low incomes, the changes create an administrative burden on our office. Because of our office's own eligibility requirements for legal services, almost all of our clients whose immigration applications allow for fee waiver usage are eligible for fee waivers due to their low incomes. The proposed changes will result in substantially more work for our office as we will be required to complete more I-912 fee waiver forms (for each member of a family we represent) as well as collect significantly more financial documentation for each application. If we anticipate individuals' applications taking much longer, we will be forced to limit the number of clients we can take on. This will negatively impact our service area and the communities surrounding our office.</p>

ID	Comment.	Commentor	Comment
1402	USCIS-2010-0008-1163	Kristin Brown, Empire Justice Center	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours, Michelle Caldera-Kopf Senior Attorney</p>

ID	Comment.	Commentor	Comment
1417	USCIS-2010-0008-1176	Adoubou Traore, African Advocacy Network	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country’s commitment to welcoming immigrants.</p> <p>Sincerely yours,</p> <p>Adoubou Traore, Director African Advocacy Network 415-503-1032; fax 415 872 9074 3106 Folsom St, San Francisco, CA 94110</p>

ID	Comment.	Commentor	Comment
1422	USCIS-2010-0008-1180	Marita Etcubanez, Asian Americans Advancing Justice AAJC	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services. Many of the immigration legal service providers Advancing Justice AAJC works with only process fee waiver applications at their Citizenship Workshops when applicants have the documentation to apply based on receipt of a means-tested public benefit. Applicants who need to document their household income or detail financial hardship are often asked to make individual appointments at a later date so that they can receive one-on-one attention from trained legal service providers rather than the volunteers who generally staff workshops. With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas. The proposed changes may even result fewer individuals assisted with fee waiver applications in one-on-one settings due to the increased work needed to help clients obtain the required documentation. The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create another insurmountable barrier for those</p>

ID	Comment.	Commentor	Comment
1432	USCIS-2010-0008-1191	Koriel Jock	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours, Koriel Jock</p> <p>Former Development Associate with Northwest Immigrant Rights Project</p>

ID	Comment.	Commentor	Comment
1449	USCIS-2010-0008-1208	Leena Khandwala, The Legal Aid Society	<p>Comment part 5: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>Legal Aid also works with numerous applicants who have Temporary Protected Status (TPS), and who rely on fee waivers when they re-register for their TPS status. Frequently we assist these applicants in completing their applications in large-scale clinic settings, where we are able to complete fee waiver applications where the applicant can show proof of receipt of a means-tested benefit. The onerous documentation requirements for fee waivers under the proposed rule will likely make it impossible for Legal Aid and other non-profit organizations to offer large-scale clinics to these applicants. Legal Aid often employs a similar large scale clinic model for naturalization applicants and the same considerations would apply there, effectively making it extremely difficult for us to assist many applicants.</p>

ID	Comment.	Commentor	Comment
1452	USCIS-2010-0008-1221	Deana Gullo on behalf of Catholic Charities of Orange County	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <ul style="list-style-type: none">•Recent changes to the I-912 form has already created more work for those in the immigration services field and causing confusion to applicants. <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours,</p> <p>Deana Gullo, LCSW, MPIA Director of Immigration Services Catholic Charities of Orange County</p>

ID	Comment.	Commentor	Comment
1460	USCIS-2010-0008-1226	Michelle Seyler, Central American Resource Center - Los Angeles	<p>Comment part 6: III. The proposed changes will place a greater burden on legal services providers, reduce access to legal services, and increase challenges to the most vulnerable members of the immigrant community</p> <p>The proposed changes will increase the burden of representing immigrants for non-profits and legal service providers and will cause a chilling effect on immigrants who are eligible to apply for relief or benefits but cannot afford to do so. For naturalization applicants, many legal permanent residents rely on the fee waiver to be able to apply for their citizenship. For many, this is the final step in a decades-long road to achieve a life-long dream of becoming a United States Citizen.</p> <p>Across the country, in rural areas and dense cities alike, legal service providers have found that hosting workshops for the community is the most time efficient way to provide services to a large number of clients. This is possible, in part, because we are able to explain with relative ease how an applicant can obtain the necessary evidence to apply for a fee waiver. If applicants need to visit the IRS multiple times in order to get the required documentation, workshops may no longer be a tenable way to serve the community.</p> <p>In addition, many non-profits rely on grants to keep their doors open. In order to qualify for these grants, non-profits need to serve a specified number of clients each year. These proposed changes to the fee waiver will make this requirement even more difficult to attain. At a time when fewer people are reaching out for help due to our political climate, this may cause some smaller non-profits to lose their funding and will therefore prevent them from serving the community that is in desperate need of assistance.</p> <p>The proposed changes to the fee waiver eligibility criteria, coupled with the increased evidentiary burden on applicants, will create insurmountable burdens for individuals to apply for immigration benefits and naturalization. We strongly urge USCIS to propose a rule that would actually streamline this process, not one that will make it dubious and impossible for so many. The immigrant community wants nothing more than to be able to live with their families in safety and to be able to civically engage in our American political process. If we increase the burden to access, many of these individuals and families will never be able to achieve this dream.</p> <p>Sincerely, Michelle Seyler mseylar@carecen-la.org (213) 385-7800 ext. 160 2845 W 7th St. Los Angeles, CA 90005</p>

ID	Comment.	Commentor	Comment
1463	USCIS-2010-0008-1228	Iris Bercovitz, SEAMAAC	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The goal of our work at SEAMAAC is to be a resource for populations that are not easily accessible. We want empower communities to use their voices and have the opportunity to instill change. With this proposed fee waiver change the ability for the civic engagement department to do its' full work will be very difficult. Clients who are difficult to provide services for will be even more cautious when seeking help.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p>

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1470	USCIS-2010-0008-1232	Sanaa Abrar, United We Dream	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations. The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>United We Dream partners alongside other nonprofit legal service providers and can attest the difficulties that the proposed changes will have in the work of people who aim to bring relief to immigrant communities across the country. Indeed, we, as any other organization, have to deal with the fact that resources whether money, time, energy and personnel are scarce, and even though we are committed to do the most (and beyond) with what we count, we cannot deny that proposals such as the changes in fee waivers will not only limit, complicate and add to our workload, but most worryingly could even threaten our work altogether in places often where it is most needed, such as rural areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities and naturalize as</p>

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1477	USCIS-2010-0008-1235	Katharyn Christian McGee, Duane Morris LLP	<p>Comment part 4: III. The proposed changes will place a time and resource burden on pro bono attorneys and legal service providers and reduce access to legal services, especially in underresourced locations.</p> <p>The proposed changes detailed above will increase the burden on pro bono attorneys and non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for pro bono attorneys and legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Duane Morris, along with non-profit immigration legal service providers in each of our offices across the U.S., organizes workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>As just two examples here in Philadelphia, Duane Morris has been an organizer of an annual Citizenship Day and citizenship clinics in Philadelphia, PA for more than five years – helping hundreds of immigrants apply to naturalize as U.S. Citizens – in addition to attending similar Citizenship Days and clinics across the country. In addition, Duane Morris leads a monthly immigration clinic for immigrants fleeing domestic violence and trafficking. Placing an additional burden on completing fee waivers would disincentivize pro bono attorneys from volunteering as well as limit the number of individuals who could be assisted at any one of these clinics.</p> <p>With the proposed changes to the fee waiver form, it will become harder for pro bono attorneys and non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater</p>

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1479	USCIS-2010-0008-1236	Maricela Gutierrez on behalf of Services, Immigrant Rights, and Education Network (SIREN)	<p>Comment part 3:II. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers, such as SIREN, and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Under the proposed changes, SIREN's attorneys and DOJ-accredited representatives will need to spend more time reviewing additional documents that clients bring and are expecting to increase the number of meetings with individual clients in order to gather all the required documents.</p> <p>In addition, currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as a model to help eligible applicants apply for immigration benefits and naturalization. At SIREN, we serve remote and rural community members including those in the Central Valley of California. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services. With the proposed changes to the fee waiver form, it will become harder for nonprofit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas</p>

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1483	USCIS-2010-0008-1237	Jorge Baron on behalf of Northwest Immigrant Rights Project (NWIRP)	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers like NWIRP and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas. The workshop model will be particularly difficult to implement in light of these changes because individuals seeking assistance and who need to pursue a fee waiver will need to contact the IRS and so will not be able to have all of their documentation prepared in one setting. Even outside of the workshop context, the proposed changes will result in an increased burden for nonprofits organizations like NWIRP. We estimate that the fee waiver changes proposed by this regulatory action will increase our workload in a number of ways. First, there will be additional documentation that will need to be gathered for an individual applicant who is pursuing a fee waiver. Instead of the applicant bringing with them the documentation that might meet the current criteria (for instance, proof of receipt of public benefits), we anticipate being asked to help them fill out a request to get tax transcripts from the IRS. Instead of being able to assist them at that initial appointment, we will then be required to make a second appointment once the IRS transcripts have been received. This will mean additional burdens for us. In light of the fact that NWIRP helped clients file over 300 fee waiver requests in the past 12 months, this burden will result in many fewer individuals being served by our</p>

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1492	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>B. This proposal will negatively impact our communities.</p> <p>This proposal will make it more difficult for low-income and vulnerable immigrants to stay on the path to U.S. citizenship, and that hurts us all. This unjust rule would essentially put a price tag on legal U.S. residency, turning our immigration system into one that heavily favors prospective immigrants with wealth, over those who seek to follow the path of upward mobility that for centuries has brought millions of immigrants to our shores and enriched our country and economy overall in the process. Just like the administration’s termination of DACA and Temporary Protected Status, cruel family separation and incarceration policy, the Muslim and asylum bans, and changes to the public charge rule, this proposed rule is an attempt to close America’s doors on those who dare to work toward a permanent future in the U.S.</p> <p>The proposed rule would not accomplish any objectives that further the purpose of USCIS and would create inefficiency and delay for the agency. In doing so, changes under the rule would also harm many potential applicants by either dissuading them from pursuing needed services due to fees they cannot pay, or by creating financial hardship for people who cannot afford the fees but pay them by foregoing other needs. By contrast, the current structure provides an efficient, proven system for determining ability to pay among applicants for immigration services, and USCIS has demonstrated not need for alterations that would push additional costs on people who can least afford them.</p> <p>Ensuring equal access to the protections Congress created is crucial, especially for domestic and sexual violence survivors who may have few financial resources of their own. USCIS should not bypass Congressional intent and undermine these laws through fee waiver policy changes. Fee waivers provide an essential pathway for survivors to seek justice and safety.</p> <p>NILC urges USCIS not to publish the proposed rule and to maintain its current criteria for assessing fee waivers as stated in Policy Memorandum PM-602-001.1.</p> <p>Respectfully submitted, Connie Choi, Esq.</p> <p>PIF Campaign Field Messengers Strategist</p>

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1467	USCIS-2010-0008-1232	Sanaa Abrar, United We Dream	<p>Comment part 2: A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. What is more, the proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. More than 94% of domestic violence survivors, for instance, experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. Hence, by limiting the ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p> <p>As undocumented youth, our lived experiences and that of our loved ones inform our strong opposition to the proposed changes to fee waiver eligibility. Whether working in the fields</p>

ID	Comment.	Commentor	Comment
1488	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>Comment part 5: A. Many immigrants who pay for these application fees will suffer financial harms resulting from the high cost of these applications.</p> <p>This proposal could undermine the stability and economic security of immigrants and their families who pay for fees that they cannot afford. For applicants who nevertheless manage to pay the full unaffordable application fee, the financial repercussions of the expense will be severe. For example, for a family of four living at 175 percent of the federal poverty guidelines (and thereby ineligible for a fee waiver under the proposed rule), an application for a replacement permanent resident card would cost nearly 15 percent of their monthly income.⁹ While this document is necessary to demonstrate authorization to work and lawful status in the U.S., the tradeoff can have dramatic impacts on the wellbeing of families.</p> <p>Studies show that “financial shocks,” or necessary expenses that an individual cannot afford, can have devastating consequences for low-income families, including for people above the 150 percent of the federal poverty guidelines proposed by the rule. For example, 50% of families who rent their home and with incomes under 200 percent of the poverty line report low confidence in their ability to cover an unexpected expense of \$400¹⁰ – an amount at the low end of application fee costs. Especially where expenses are deemed critical by an individual or family -- a quality foreseeably ascribed to immigration applications -- research shows that people living in or near poverty will forego other needs to make those payments.</p> <p>The proposed rule will needlessly amplify the effects of poverty for people who are no longer eligible for fee waivers. Multiple studies examining income volatility show financial shocks increase the likelihood that a family will experience food insecurity, where unexpected costs cause families to go hungry.¹¹ This effect extends beyond nutrition, as families forced to pay for needed expenses they cannot afford will skimp on medical care, utilities payments, educational costs, and other basic essentials so that they can cover the unexpected cost.</p>

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1244	USCIS-2010-0008-1063	Erin Hustings, Naturalization Working Group	<p>Comment part 2: The Proposal Will Burden All Stakeholders in the Application Process</p> <p>By proposing to eliminate a simple bright-line test, USCIS threatens to impose a heavier burden on its adjudicators, other government agencies, applicants, and those</p> <p>3</p> <p>who assist them. Such an action would violate the Paperwork Reduction Act because no law or other practical consideration mitigates in favor of the change. It has never been more imperative that USCIS avoid needlessly complicating application processing. Backlogs of pending applications and wait times for adjudication have increased between FY16 and FY19, frustrating millions of American families and businesses, and their immigrant family members or employees. USCIS can ill afford to further delay its operations at this challenging time.</p> <p>USCIS will waste resources in duplicative efforts if it adopts the proposal. Receipt of a means-tested benefit is the only current method for establishing eligibility that involves a yes-or-no determination that administrators can reach by reviewing a single document. No one piece of evidence—not even a tax return or certification of non-liability for taxes—will always show how an individual's income compares to federal poverty guidelines, nor the extent to which an individual is experiencing current financial hardship. For example, USCIS asks fee waiver applicants with incomes below 150% of poverty level to submit not just their own tax filings or certification of non-liability for taxes, but also complete documentation of any discrepancy between current and reported income, of all household members' incomes, and of any income not reflected in tax filings (or affirmation of non-receipt of any non-taxable income).</p> <p>Applicants often need to document many factors to show financial hardship, including sources of income as well as extraordinary expenses related to illness, natural disaster, or other special circumstances. Receipt of a means-tested benefit is</p>

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428	USCIS-2010-0008-0598	Jason Miller, Franciscan Action Network	<p>As the Director of Campaigns and Development with the Franciscan Action Network an an advocate with the Franciscan family nationwide I am calling on the federal government to not make a change to the fee waiver program. As a nation of immigrants we should not put undue burden on those seeking to immigrate to the United States.</p> <p>These proposed changes would deny access to relief for deserving immigrants and, as with the proposed changes to public charge, are one more example of this administrations favoring the wealthy over working class people, low-wage workers, and vulnerable populations who make immeasurable contributions to our communities and our economy.</p> <p>We must be a welcoming to all, especially immigrants seeking a better life in this country, as we have done throughout all of our history.</p>

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487	USCIS-2010-0008-0676	Stella Wong, Catholic Charities Hawaii (CCH)	<p>Re: OMB Control Number 1615-0116 Docket ID USCIS-2010-0008 Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121 Dear Ms. Deshommes:</p> <p>I am writing on behalf of Catholic Charities Hawaii (CCH) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, published in the Federal Register on September 28, 2018.</p> <p>CCH annually provides legal immigration assistance to approximately 200 immigrants in Hawaii as a Department of Justice/Office of Legal Access Program recognized agency. Over 60% of our clients received services at no cost due to their low income status and our Accredited Representative staff have applied for waivers of USCIS fees for some of these low income clients.</p> <p>Our low income immigrant clients come to the United States to create a better life for themselves and their families. Many have gone on to become self-sustaining members of our community - opening their own small businesses to provide jobs for others, operating farms to grow food for communities, and taking on more responsible work roles in various companies - add contributing as tax paying residents and citizens.</p> <p>The proposal narrows the type of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>We oppose the proposal which does not allow an individual to use evidence of a means-tested public benefits to demonstrate his/her inability to pay the prescribed fee. Receipt of a means-tested benefit should be sufficient evidence of inability to pay. We feel USCIS has not provided any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes also make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents.</p> <p>Increasing the burden of applying for a fee waiver will limit access to naturalization for eligible lawful permanent residents. The challenge of the 600% increase in the</p>

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552	USCIS-2010-0008-0697	David Loud, Puget Sound Advocates for Retirement Action	<p>RE: OMB Control Number 1615-0116, USCIS Docket ID USCIS-2010-0008.</p> <p>I am submitting this comment on behalf of Puget Sound Advocates for Retirement Action, a multi-generational organization working for retirement security for current and future generations in the US. Our members include naturalized citizens.</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver.</p> <p>My wife, who became a naturalized citizen after entering our country as a refugee, works in a non-profit community agency to help immigrants and refugees apply for US citizenship. She has shared with me examples from her direct experience of how the proposed rule change would create an insurmountable barrier to citizenship for some of her clients.</p> <p>The proposed rule change seems designed to create such barriers. Variation among state policies for eligibility for means-tested public benefits could be addressed by USCIS without putting the burden of tax-filing on lawful residents who have benefited from public benefits, such as SNAP, to which they are legally entitled.</p> <p>We strongly oppose a rule change which would make our country less welcoming to people seeking a better and freer life.</p>

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518	USCIS-2010-0008-0664	Ester Greenfield	<p>Dear USCIS,</p> <p>I am submitting this comment in response to the USCIS proposed rule that would eliminate the submission of a letter evidencing receipt of public benefits as a ground for a fee waiver. I have been practicing immigration law for more than 35 years. I have also volunteered at numerous immigration legal clinics and Citizenship Day workshops sponsored by OneAmerica here in Washington State. In my private practice, I have assisted many wealthy clients apply for and obtain US citizenship. In my volunteer work, I have assisted many clients of all economic means to prepare their N-400 applications. Some of the clients who seek help at Citizenship Day workshops have just become eligible to apply. Many others have had their green cards for up to 30 years and are thrilled to actually fulfill their dream of becoming a US citizen. In many of these instances, they are surrounded by family members who obtained citizenship years earlier or who were born in the US. There are literally thousands of green card holders who are fully eligible for citizenship, cannot afford expensive attorneys, and are blocked by the thought of onerous paperwork requirements. This is why Citizenship Day workshops by organizations such as OneAmerica fill such a vital community need.</p> <p>At the same time, USCIS is plagued by delays in adjudication. It makes sense to streamline rather than complicate immigration processes, provided that the requirements of the INA are met.</p> <p>In this context, the proposed rule regarding fee waivers makes no sense and is counterproductive. A letter confirming the receipt of means tested benefits is the simplest way to demonstrate that the applicant needs and is eligible for a fee waiver. Proof consists of one piece of paper, making it easier for the applicant and for community based organizations such as One America to help people apply.</p> <p>Further, the fact that an applicant is receiving a public benefit means that the funding agency has already vetted the applicant and made sure that he or she is eligible. States have tight budgets and have every interest to ensure that they are only providing benefits to those who truly need them.</p> <p>If the rule is revised to require individual proof of income or hardship in all instances, it creates a paperwork nightmare. Some applicants do not have sufficient income to file tax returns and thus don't have them. The burden on applicants to product documentation, and upon community based organizations, to review and collect this paperwork, is great and is not acknowledged in the justification for the proposed change. Further, it takes way more time for USCIS to review and adjudicate the fee waiver request if individual proof of income or hardship is required. These two methods to show financial need should be retained as there are applicants who do not receive public benefits as a matter of course. But they should not be the only options.</p>

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513	USCIS-2010-0008-0618	Kevin Wong, Grace Fellowship Community Church	<p>Waiving certain immigration fees, such as the application for citizenship and some applications for a green card for those who have established financial need is an important way to maintain equity and justice, opportunity for all.</p> <p>Means-tested benefits are an equitable way to ensure eligibility in the context in which the applicant lives. Federal definitions of poverty are not adequate to assess financial need in localities with higher costs of living. Do not penalize hard working immigrants who contribute so much to our nation, preventing them from full participation as naturalized citizens or as legal residents of our country.</p> <p>It would be grievous to many in my community if these changes were made, an unfair impediment to those who want to lawfully be a part of this county. As part of the Kaleo ministry at Grace Fellowship Community Church in San Francisco, CA, we have walked with many through this process, and our experience shows that the financial burdens are heavy and if fees were not waived for these immigration application fees through means-tested benefit eligibility, many would be unable to share in the citizenship of this strong nation.</p>

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532	USCIS-2010-0008-0629	Kathleen Ryan	<p>I am strongly opposed for the proposed change in fee waivers, which will make it almost impossible for hundreds of thousands of legal permanent residents to become U.S. citizens. We have taught Citizenship Classes for over 20 years, and we deeply respect the desire of all of these immigrants, whether they are poor or wealthy, to become part of the fabric of the United States, which is built on the lives of patriotic, hard-working immigrants.</p> <p>We have students from 14 different countries, and they all study for hours and hours to pass the naturalization exam and interview. They want to become U.S. citizens and to support our country. They are working for minimum wage or less, and they often cannot afford to pay the \$725.00 fee because of their low wages and family obligations. Please do not penalize these poorer immigrants through the proposed change in fee waivers.</p> <p>Sincerely,</p> <p>Sr. Kathleen Ryan, OP Dominican Literacy Center, Aurora</p>

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602	USCIS-2010-0008-0941	Kham Moua, Southeast Asia Resource Action Center	<p>Comment part 1: U.S. Citizenship and Immigration Services Department of Homeland Security (DHS) Office of Policy and Strategy – Regulatory Division 20 Massachusetts Avenue, NW Washington, DC 20529-2140</p> <p>Re: Docket No. USCIS-2010-0008, OMB Control Number 1615-0116, Comments in Response to Proposed Rulemaking: Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of the Southeast Asia Resource Action Center (SEARAC), we offer comments in response to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) notice of proposed rulemaking (NPRM) to discontinue the use of means-tested benefits as a factor when considering fee waivers for naturalization in favor of using income as the sole determinant. 1</p> <p>SEARAC is a national civil rights organization that empowers Cambodian, Laotian, and Vietnamese Americans communities to create a socially just and equitable society. As representatives of the largest refugee community ever resettled in the United States, SEARAC strongly believes that fair immigration processes and decreased barriers to citizenship for Southeast Asian American (SEAA) communities are necessary for lawful permanent residents (LPR) to fully participate in the American ecosystem.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities, refugees and vulnerable individuals.</p> <p>Narrowing the scope of factors determining applicant fee waiver needs creates additional monetary hurdles negatively affecting the ability of many low-income immigrants to naturalize.</p> <p>Efforts should be made by the Department to reduce barriers to citizenship rather than make the process less accessible. If USCIS were to make any changes to the fee</p>

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610	USCIS-2010-0008-0980	Patrick Byrne, The Alameda County Board of Supervisors	<p>November 26, 2018</p> <p>Ms. Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy 20 Massachusetts Avenue, NW Washington, DC 20529-2140</p> <p>RE: Docket ID USCIS-2010-0008; OMB Control Number 1615-0116 -Fee Waiver Eligibility Criteria to Form 1-912</p> <p>The Alameda County Board of Supervisors in California appreciates the opportunity to comment on the above-referenced proposed revision published in the Federal Register on September 28, 2018.</p> <p>Alameda County strongly opposes this proposal as it will impose a significant burden on individuals applying for immigration benefits and it will negatively impact our communities. The increased requirements and additional evidence to be collected from applicants on the proposed amended Form 1-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Alameda County believes reasonable access to fee waivers are critical to ensuring our constituents have access to relief from undue burden.</p> <p>Alameda County is home to 1.67 million residents and is the seventh most populous county in California. Alameda is the most diverse county in the Bay Area and the fourth most diverse in the United States, and is home to over half a million immigrants who live, work, attend school, vote and engage in everyday activities in our communities. Nearly 1 in 3 Alameda County residents (32%) is an immigrant. This represents at least 526,124 naturalized U.S. citizens, lawful permanent residents, temporary migrants, humanitarian migrants, and other foreign-born residents who were not U.S. citizens at birth. Requiring additional documents will serve as a deterrent to applying for immigration benefits and naturalization.</p> <p>The current Form 1-912 indicates longstanding USCIS guidance on the three bases used to determine eligibility for a fee waiver: receipt of a means-tested benefit; low income (as defined by income at or below 150 percent of the Federal Poverty Guidelines); or financial hardship. Currently, an applicant only needs to meet one of these criteria to qualify. As drafted, the proposal doubles the length of Form 1-912, from five pages to ten pages. It also proposes to remove the receipt of means-tested benefit as a basis for the fee waiver request, leaving only income and financial hardship eligibility, and requires documentation showing when benefits expire or must be renewed. This change would impose a needlessly long and complex process, that will burden the most vulnerable and lowest income residents in our communities. Furthermore, means-tested benefits as a base is more efficient to determine eligibility than relying solely on the income and financial hardship eligibility because recipients of means-tested benefits have met the strict requirements and demonstrated their qualification.</p> <p>Alameda County further opposes these proposed changes as it will discourage eligible individuals from filing for immigration status when the naturalization fee has</p>

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646	USCIS-2010-0008-0968	Tana Liu- Beers, Disciples Immigration Legal Counsel	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I write on behalf of Disciples Immigration Legal Counsel to oppose USCIS’ proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Disciples Immigration Legal Counsel, a ministry of Disciples Home Missions, is a nonprofit legal services provider serving the Christian Church (Disciples of Christ). We provide cost-free immigration legal services to pastors, seminarians, and parishioners in our denomination, many of whom are eligible for fee waivers on their I-90 Applications to Replace Permanent Resident Card, N-400 Applications for Naturalization, N-600 Applications for Certificate of Citizenship, I-765 Applications for Employment Authorization, I-751 Petitions to Remove Conditions, and others.</p> <p>Our office works with individuals of all financial statuses because God’s call to ministry is not limited to the elite, wealthy few. The proposed changes to the fee waiver eligibility criteria would significantly burden many of our pastors, seminarians, and church members, creating an unacceptable barrier for non-wealthy immigrant communities. Many would be dissuaded from applying even if they were eligible. Also, the increased documentary requirements would further tax the already-limited resources of our office, perhaps causing us to be able to help fewer people.</p> <p>The proposed changes would prevent many individuals, especially the most vulnerable, from applying for immigration benefits and naturalization.</p> <p>The ever-increasing filing fees required by USCIS are an insurmountable obstacle for many seeking immigration benefits and naturalization. For example, the naturalization fee has gone up 600% over the last twenty years, pricing many qualified lawful permanent residents out of U.S. citizenship. Therefore, fee waivers are a necessary provision for many who could not otherwise access the legal immigration system.</p> <p>The proposed changes would further limit access to the legal immigration system by increasing the burden of applying for a fee waiver. Vulnerable populations, such as domestic violence survivors and</p>

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359	USCIS-2010-0008-0484	Lisa McElaney	<p>I oppose the proposed revision. It discriminates against prospective citizens with low incomes and would eliminate a person's receipt of means-tested benefits as a basis for qualifying for a fee waiver in citizenship and green card applications. This is patently unfair.</p> <p>I am a foster parent to a young adult who was abandoned by her parents here in the U.S. when she was fifteen. She has moved through our courts to establish herself as a 'juvenile, special status' and is now a permanent resident. She has a full scholarship to Bowdoin College, won the student of the year award from the society of black physicists and will head to a PhD program in physics and math next year. Her plan is to teach and increase the number of women in the physical sciences. Had our girl not had our financial support she would not have been able to pursue legal status. What a loss that would have been for the U.S.</p> <p>My husband is a Cuban refugee. He knows well what a different sort of welcome to immigrants looked like.</p> <p>I am a mental health care provider who has immigrants and first generation Americans in my practice. Creating more obstacles for them to achieve security for themselves and their families is contrary to our nation's founding and sustaining principles. So is discrimination on the basis of wealth.</p> <p>Please withdraw the proposed revision and retain some equity in an already challenging process.</p>

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360	USCIS-2010-0008-0484	Lisa McElaney	<p>I oppose the proposed revision. It discriminates against prospective citizens with low incomes and would eliminate a person's receipt of means-tested benefits as a basis for qualifying for a fee waiver in citizenship and green card applications. This is patently unfair.</p> <p>I am a foster parent to a young adult who was abandoned by her parents here in the U.S. when she was fifteen. She has moved through our courts to establish herself as a 'juvenile, special status' and is now a permanent resident. She has a full scholarship to Bowdoin College, won the student of the year award from the society of black physicists and will head to a PhD program in physics and math next year. Her plan is to teach and increase the number of women in the physical sciences. Had our girl not had our financial support she would not have been able to pursue legal status. What a loss that would have been for the U.S.</p> <p>My husband is a Cuban refugee. He knows well what a different sort of welcome to immigrants looked like.</p> <p>I am a mental health care provider who has immigrants and first generation Americans in my practice. Creating more obstacles for them to achieve security for themselves and their families is contrary to our nation's founding and sustaining principles. So is discrimination on the basis of wealth.</p> <p>Please withdraw the proposed revision and retain some equity in an already challenging process.</p>

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406	USCIS-2010-0008-0600	Claire Valentin, Children's Law Center of Massachusetts	<p>Comment part 1: OMB Control Number 1615-0116 Docket No. USCIS 2010-0008 Agency: U.S. Citizenship and Immigration Services, Department of Homeland Security</p> <p>The Children’s Law Center of Massachusetts (Children’s Law Center) submits this comment opposing the proposed regulations relating to the revision of the collection of information for fee waivers granted by U.S. Citizenship and Immigration Services in the adjudication of immigration benefit requests.</p> <p>The Children’s Law Center represents children and youth from diverse backgrounds on a variety of legal matters including education, immigration, mental health, and child welfare matters. Our immigration attorneys work with children and youth who are eligible for, and deserving of, humanitarian immigration relief due to abuse, trauma, and persecution they have suffered in their home countries. Our clients include youth who are eligible for or who have been granted special immigrant juvenile classification and asylum. Typically, our clients have arrived to the United States as unaccompanied immigrant children and do not have parents or legal guardians caring for them. A number of our clients are in state foster care. All of them are low-income. The proposed revision relating to the collection of information for fee waivers granted by U.S. Citizenship and Immigration Services (U.S.C.I.S.) would negatively impact our immigrant child clients who are applying for humanitarian protection and attendant immigration benefits.</p>

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472	USCIS-2010-0008-0662	John Howard, Jr., Justice For Our Neighbors Houston	<p>My name is John M Howard, Jr. Board Member of Justice For Our Neighbors Houston, a United Methodist Church's program of high quality immigration legal services for the low income immigrant community. We are following the Biblical command to welcome hospitably the stranger. The approximately 200 persons each month requirring waivers to their applications for adjustment of status are hard working, law abiding contributing members of our community of which the fees are exorbitant and should have no fee at all. All those with whom we counsel and represent are below the 125% poverty level and for whom the fees are already burdensome even with the waiver being discussed to abandon by USCIS -2010-0008. So I oppose the elimination of waivers for immigration applicants.</p> <p>I know that you are doing your job and attempting to be a public servant, but please protect the most vulnerable members of our community, many of whom are in fear of their lives if returned to Central America, the murder capital of the world. We are seeing those fleeing terror and finding racism, militarization, as well as generosity, and welcome as they persue the American Dream as much or more so than our local citizens.</p>

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474	USCIS-2010-0008-0624	Monica Harris, The City of Dayton	<p>The City of Dayton is proud to be an immigrant-friendly city and to support our immigrant community members through the naturalization process. As the City's Welcome Dayton Coordinator, I am honored to attend naturalization ceremonies, where I witness dozens of people from all over the world pledge their loyalty to the United States.</p> <p>As such, I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees (in the last 15 years, application fees have increased by \$425, a 141% increase). By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants limited resources and eligibility for public benefits. The rule also fails to take into account regional variation--in particular, the fact that a person may not qualify for a fee waiver under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disproportionately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>In calendar year 2017, almost 40 percent of citizenship applicants applied for a fee waiver, the majority of which were based on receipt of a means-tested benefit; almost ALL of the clients we work with to complete naturalization applications apply for fee waivers. This means that the proposed rule has the potential to impact approximately 244,000 immigrants nationwide who have the opportunity to obtain citizenship and the right to receive fair and equal treatment from USCIS. Instead, the proposed rule would increase the overwhelming backlog of over 750,000 citizenship applications before USCIS, extend waiting times for those applicants (which has already recently doubled), or worse, deter eligible immigrants from applying. The rule would thus prevent many immigrants from integrating into the country, and accessing higher economic and educational opportunities. Ultimately, it harms us all. It is for these reasons that I strongly oppose the proposed rule and call on DHS to withdraw it.</p> <p>Sincerely,</p> <p>Monica F. Harris, Welcome Dayton Coordinator</p>

ID	Comment.	Commentor	Comment
498	USCIS-2010-0008-0608	Sonya Chung, Minkwon Center for Community Action	<p>Comment part 1:</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of MinKwon Center for Community Action in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The MinKwon Center for Community Action is a grassroots, immigrant rights organization dedicated to empowering the Korean American community, and working with the wider Asian American and immigrant communities to achieve economic and social justice for all. Within our social services department, the MinKwon Center provides pro bono immigration legal services to low income immigrants. I am an immigration staff attorney at MinKwon Center, and we regularly file various applications for immigration benefits to USCIS, including naturalization and green card renewals.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and also have timing and resource burdens on</p>

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650	USCIS-2010-0008-0745	Margaret Odonnell	<p>The is a Comment on the U.S. Citizenship and Immigration Services (USCIS) Notice: Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>For related information, Open Docket Folder</p> <p>Comment Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Service Department of Homeland Security 20 Massachusetts Ave., NW Washington, DC 20529-2140</p> <p>RE: USCIS-2010-0008, OMB Control Number 1516-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions Submitted via [www.regulations.gov]</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of Global Law Advocates PLLC, I am submitting this response to U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions published in the Federal Register on September 28, 2018 (hereinafter proposed revisions). These proposed revisions relate to Form I-912; Request for Fee Waiver and accompanying memoranda.</p> <p>My law firm works directly with immigrant survivors of domestic and sexual violence and those affected by human trafficking and/or children who have suffered abuse, abandonment, neglect, as well as with citizenship applicants.</p>

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660	USCIS-2010-0008-0811	Keiko Cervantes-Ospina	Community Legal Advocates of New York vehemently opposes PM-602-0011.1. The qualifications needed in order to receive means-based public benefits indicate a financial inability to pay for ever-rising fees. Therefore, those who qualify for means-based benefits should automatically qualify for a fee waiver. The proposal to demand proof of income results in a significant burden on individuals requesting fee waivers. PM 602-0011.1 makes receiving a fee waiver too difficult, and will result in fewer qualifying individuals being able to file applications. Those who have already been approved for means-based public benefits should also be expressly approved for a fee waive

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706	USCIS-2010-0008-0751	Amy Lee, Jubilee Immigration Advocates	<p>Comment part 1: November 26,2018</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120,49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Jubilee Immigration Advocates (Jubilee) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28,2018.</p> <p>Jubilee's mission is to reflect God's intent for humanity to live as a reconciled and restored community. We stand in solidarity with immigrants by providing high quality, affordable immigration legal services and advocating for just immigration policies. We are a 501(c)(3) nonprofit organization that provides a mix of pro bono and low bono immigration legal services and seeks to make high-quality legal representation accessible to vulnerable and underserved immigrants in the Bay Area. Our case docket includes family-based immigration, affirmative relief for victims of violence and abuse, removal defense and naturalization. Over one-third of our clients are Asian or Pacific Islander and about one-half are Latino. Since we launched in 2015, we have provided direct immigration legal services to over 1200 individuals. Over 80% of these individuals had incomes at or below 250% of the federal poverty level. The majority of our</p> <p>clients receive means-tested benefits and apply for forgiveness on that basis.</p>

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461	USCIS-2010-0008-0675	Joyce Grover, Kansas Coalition Against Sexual and Domestic Violence (KCSDV)	<p>Dear Ms. Deshommes:</p> <p>On behalf of the Kansas Coalition Against Sexual and Domestic Violence (KCSDV), I am submitting this response to U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions" published in the Federal Register on September 28, 2018 (hereinafter "proposed revisions"). These proposed revisions relate to Form 1-912; Request for Fee Waiver and accompanying memoranda.</p> <p>Our organization works directly with immigrant survivors of domestic and sexual violence and those affected by human trafficking. Our coalition consists of our organization and 26 independent, sexual and domestic violence, victim advocacy services programs across Kansas. At KCSDV our Legal Assistance to Victims — Immigration Project assists immigrant survivors in accessing the legal system at no cost to the client. Our Immigration Project Attorney and Immigration Advocate strive to provide these clients with the highest level of services available.</p> <p>Given our mission and our work, we stridently oppose these proposed revisions to the 1-912 fee waiver application and instructions as well any corresponding changes to the USCIS Policy Memorandum, PM-602-0011.1. We call on USCIS to withdraw the proposed revisions to the fee waiver form and USCIS memoranda and instead, to develop policies and procedures that ensure that immigrant survivors of violence have equal access to critical, lifesaving protections. The survivors we help need fee waivers to access the vital immigration protections Congress created in the Violence Against Women Act (VAWA) and Trafficking Victims Protection Act (TVPA). They often are fleeing abusive situations where they have been financially and emotionally bankrupted by their abuser. Survivors often do not have resources to pay for fee-based ancillary forms nor have "primary documentation" (tax transcripts, Verification of NonFiling) to demonstrate their economic need.</p> <p>When a woman decides to leave their abusive situation they are changing the government</p>

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649	USCIS-2010-0008-0763	Patti Seger on behalf of End Domestic Abuse Wisconsin, the Wisconsin Coalition Against Domestic Violence (End Abuse)	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of End Domestic Abuse Wisconsin, the Wisconsin Coalition Against Domestic Violence (End Abuse), in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>End Abuse is a statewide organization that promotes social change that transforms societal attitudes, practices and policies to prevent and eliminate domestic violence, abuse, and oppression. End Abuse’s work includes providing training, support, and technical assistance to local domestic abuse programs and engaging in local, state, and national policy work. End Abuse supports humane and fair treatment of immigrants by the government and private citizens alike.</p> <p>Wisconsin is home to a growing immigrant population. There are an estimated 288,544 foreign-born people residing in Wisconsin.¹ From 1990 to 2016 Wisconsin’s foreign-born population doubled, from 2.5% to 5% of the total state population.² Wisconsin’s Latinx population increased by 95% from 2000 to 2015.³ Wisconsin’s immigrants hail from many different countries. As of 2015 “[t]he top countries of origin for immigrants [in Wisconsin] were Mexico (31.6 percent of immigrants), India (8.1 percent), Laos (6.6 percent), Thailand (3.7 percent), and China (3.5 percent).” As of 2016, “379,613 people in Wisconsin (6.6 percent of the state’s population) were native-born Americans who had at least one immigrant parent.”⁴</p> <p>The dairy industry, very important to the state, relies heavily on immigrant workers.⁵ Data shows that immigrants are integral to the state’s economy, making up “over 22 percent of all Wisconsin farmers, fishers, and foresters” and “12 percent of residents working in the computer and math sciences.”⁶ The health, safety, and wellbeing of Wisconsin’s immigrant community, including immigrant survivors of domestic abuse, impacts every person who lives in the state.</p> <p>Wisconsin’s domestic abuse programs serve survivors from all backgrounds, including immigrant survivors. Many Wisconsin programs, both mainstream and culturally specific, have bilingual staff that serve Wisconsin’s growing immigrant community, in particular Spanish, Hmong, and Russian speakers.</p>

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707	USCIS-2010-0008-0972	Irena Sullivan, Tahirih Justice Center	<p>Comment part 1: The Tahirih Justice Center (Tahirih) is pleased to submit the following comments in response to USCIS’ proposed revision of Form I-912 Request for Fee Waiver, published in the Federal Register on 09/28/2018 at https://federalregister.gov/d/2018-21101.</p> <p>Tahirih is a national policy and direct services organization that has assisted over 25,000 immigrant survivors of gender-based violence for the past twenty-one years. Our clients endure horrific abuses such as human trafficking, domestic violence, sexual assault and other crimes. Due to the dynamics of abuse, immigrant survivors are mostly indigent and rely heavily on fee waivers in order to apply for immigration relief and ultimately find safety. As a result, survivors will suffer disproportionately from the unnecessary new evidentiary restrictions proposed by USCIS.i</p> <p>On behalf of our clients, Tahirih strongly opposes USCIS’ proposal to revise Form I-912 and rescind the Form’s corresponding Policy Memorandum, PM-602-0011.1.ii Instead, we urge USCIS to maintain flexible evidentiary policies that can both reflect the unique circumstances our clients face as survivors and that do not pose additional burdens for taxpayers.</p> <p>I. Prohibiting evidence of receipt of means-tested public benefits to establish eligibility for fee waivers will prevent survivors of gender-based violence from applying for immigration relief designed specifically for them.</p> <p>a. The vast majority of survivors are indigent and unable to pay filing fees.</p> <p>A hallmark of domestic violence is perpetrators’ use of both acute and chronic threats of harm to keep survivors in a perpetual state of isolation, poverty, and various forms of dependence. Economic dependence is prevalent among survivors, as abusers condition them to expect brutal retaliation for either applying for a work permit, or for seeking employment if already eligible to work. Perpetrators are commonly known to hold survivors’ documents hostage, further preventing them from securing employment as a logistical matter and - by design - all but guaranteeing their dependence on them indefinitely. Abusers are well aware that when victims have fewer opportunities to interact independently with others outside the home, they are less likely to try to escape or report abuse. The paralysis survivors experience is compounded when children are involved, especially when the only alternative to a violent home is homelessness.</p> <p>Survivors who are authorized to work face additional challenges to obtaining and maintaining employment. They might frequently or abruptly miss work due to the violent, unstable circumstances at home, making them vulnerable to termination by employers. With limited ability to earn income consistently, survivors overwhelmingly depend on fee waivers in order to apply for immigration relief.</p>

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137	USCIS-2010-0008-0285	Elizabeth Kirk	<p>My name is Elizabeth Kirk, and I write in oppose to Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. Im a volunteer for OneAmerica, a 501(c)(3) organization that helps people apply for U.S. citizenship with free assistance from volunteer attorneys. Over the years, many of the clients we serve have been eligible for fee waivers based on receipt of public benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people. I oppose the rule for several reasons:</p> <p>A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay. States and localities have already done a needs based test! Putting a low-income family through all of the hoops and regulations once is enough we do NOT need to create a second separate system for these families to file for a family members citizenship. Im tired of the US government creating new processes to simplify or unify already complicated processes that are already in place. USCIS does not need to add to the cost and bureaucracy.</p> <p>Imagine the negative impact of this unnecessary new barrier America will only become more elitist in our immigration policies which privilege wealthy white families. I know of several individuals from around the world whose happiness and quality of life depends on obtaining American citizenship. Families where one parent is an American and the other spouse is a foreigner. To separate families is wrong and unnecessary, and this hoop would only make it more difficult for low-income individuals to apply for citizenship for their spouses or children.</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason. I am proudest of my country when it is a country that represents hope, diversity, compassion, and a good life. This proposed rule would be another reason for me to be ashamed of how we treat foreigners and our low income citizens.</p>
288	USCIS-2010-0008-0431	Sarah Deibler	<p>As an attorney who has worked on hundreds of naturalization applications, I strongly urge you not to undertake this change. Calculating and verifying fee waivers based on household income is far more time consuming for attorneys and USCIS officers than fee waivers based on receipt of means tested benefits. Moreover, this change would unnecessarily and cruelly chill and even prevent many legal permanent residents from pursuing naturalization and pledging allegiance to the United States.</p>

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1320	USCIS-2010-0008-0950	Brian Schaeffer on behalf of the Refugee and Immigrant Center for Education and Legal Services (RAICES)	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services. With the proposed changes to the fee waiver form, it will become harder for non-profit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>Resources to provide legal aid are extremely limited. Service providers are trying to serve as many clients as possible. As the time required to complete any application increases, the number of clients that an organization can serve naturally increases. Having to prove eligibility under the 150% guideline rather than the means-tested benefit takes more time. In some cases, the total time needed to spend with a client will almost double. For instance, in assisting a person with an I-765 form, the time required for the I-912 will take longer than the form for the benefit sought.</p> <p>Serving fewer clients will also have an impact on grant requirements that legal service providers already struggle to meet. Funders and grantors expect legal service providers to serve as many clients as possible. Having to spend more time with individual clients filing out the I-912 to meet the 150% standard will effectively reduce the number of clients that can be assisted. With fewer clients served, grantors and funders may move their resources to a different area where more individuals can be helped.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>Sincerely yours,</p> <p>Brian Schaeffer</p>

ID	Comment.	Commentor	Comment
101	USCIS-2010-0008-0234	Andrew Hays	<p>I'm writing to express my opposition to the proposed changes in the fee waiver approval regulations. Below are a few of the main reasons that this proposed change is ill conceived:</p> <ol style="list-style-type: none">1. Income is part of the story but is not the whole story. By basing a petitioner's eligibility for a fee waiver purely on their income, USCIS will be overlooking the peculiarities of different contexts. In a city where the median income is \$45K, for example, a petitioner's wage will go much farther than in a city where it's \$75K.2. This is an infringement on each state's right to set its own standard for what constitutes vulnerability in its own context.3. Low income clients, the elderly and the disabled who are not required to file tax returns will have an undue burden to prove their need for a fee waiver. This is penalizing the very types of people who the waiver is supposed to be helping--the most vulnerable.4. The regulation anticipates it taking 1.17 hours to complete a fee waiver form; for immigrants who lack the English or other ability to complete this form on their own, this will require them to retain legal assistance. With a more burdensome form will come higher legal fees, defeating the very end which the fee waiver is supposed to achieve--saving money for those who need it most.5. The extra money that petitioners will have to spend, whether in higher legal fees or in USCIS fees that they'd otherwise qualify to be waived, is money that's not going into the American economy. Immigrants start and maintain businesses at a rate higher than the average American, meaning that their dollars go especially far in stimulating the economy. Nickeling and diming these folks is not just shameful, it's bad for the economy.

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1111	USCIS-2010-0008-1231	Hannah Flamm	<p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p>

ID	Comment.	Commentor	Comment
1338	USCIS-2010-0008-1012	Julia Brown, Immigrant Legal Advocacy Project	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Immigrant Legal Advocacy Project (ILAP) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>As Maine’s only state-wide immigration legal services organization, ILAP helps immigrants improve their legal status and advocates for more just and humane laws and policies. With this support, immigrants in Maine are able to achieve safety and stability for themselves and their families, access educational and employment opportunities, build networks of support, and become power advocates for social justice in their communities. ILAP works directly with immigrant survivors of domestic and sexual violence and those affected by human trafficking and children who have suffered abuse, abandonment or neglect. In addition to directly working with those vulnerable individuals, ILAP also does systemic advocacy for those populations on local, state, and federal levels.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an unreasonable burden on Maine immigrant communities, especially vulnerable individuals. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on ILAP’s clients applying for immigration benefits and will negatively impact our immigrant communities here in Maine. The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and</p>
377	USCIS-2010-0008-0525	Stephanie Tobosa- Smit	<p>I strongly oppose the proposed changes to the fee waiver eligibility criteria and accepted evidence. Please see attached.</p>

ID	Comment.	Commentor	Comment
1238	USCIS-2010-0008-1013	Yadira Chavez, On The Move/Citizenship Legal Services	<p>Comment part 3:B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests that comply with 8 C.F.R. §103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete and submit the Form I-912, when self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. §103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together. Third, the proposal eliminates an individual's ability to use proof of receipt of mean-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. §103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility once again to USCIS. By eliminating receipt of means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing economic challenge of paying application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Services (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals keep copies on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail.</p>

ID	Comment.	Commentor	Comment
1413	USCIS-2010-0008-1175	Wendy Cervantes, Center for Law and Social Policy	<p>Comment part 2: II. The proposed rule will place a significant burden on individuals applying for immigration benefits, creating additional barriers to obtaining immigration benefits for which they are eligible.</p> <p>Under the proposal, fee waivers will only be granted using Form I-912, requiring individuals to document their financial situation, including all assets, expenses, and liabilities and to provide supporting documentation. No longer would individuals be able to submit a letter or affidavit to demonstrate financial hardship as currently permitted. The proposal also requires additional documentation when submitting an I-912. For example, an individual must now provide a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. These additional requirements would create a significant time and resource burden for individuals, particularly those who would need to obtain legal assistance to fill out the form correctly and gather the necessary documentation. The proposed changes also increase the chances for error.</p> <p>The proposal also requires each applicant to submit their own form, eliminating the current guidelines which allow couples and families to submit joint applications. Joint applications simplify the filing process because all relevant data is collected in one location, and requires the payment of a single fee. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, such as an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS. This is not only burdensome to the families applying for immigration benefits, but also increase the administrative burden on the IRS (which must respond to the additional requests for documentation) and on USCIS, which must review and approve each application separately. There is no reason to believe that members of a family will have different economic circumstances, so there is no justification for this additional burden.</p> <p>Finally, the proposal eliminates the 2011 guidance allowing individuals to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee.⁷ Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is the intent of the requirements under 8 C.F.R. § 102.7(a). The purpose of the 2011 guidance was to make it easier for individuals to demonstrate financial hardship and make</p>

ID	Comment.	Commentor	Comment
1098	USCIS-2010-0008-1218	Comment Submitted by Brian Huttenburg, Total as of 11/28/2018: 7	<p>Mass mail campagin -- Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a</p>

ID	Comment.	Commentor	Comment
1174	USCIS-2010-0008-0886	Michelle Carey, The Los Angeles Center for Law and Justice	<p>Comment part 3: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form 1-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form 1-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form 1-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee.</p> <p>Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is</p>

ID	Comment.	Commentor	Comment
1266	USCIS-2010-0008-1020	John Keller on behalf of the Immigrant Law Center of Minnesota	<p>Comment part 3: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

ID	Comment.	Commentor	Comment
1059	USCIS-2010-0008-1179	Courtney Tudi, World Relief	<p>Comment part 1: RE: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>World Relief submits the following comments to the Department of Homeland Security, United States Citizenship and Immigration Services (USCIS) regarding its proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. World Relief appreciates the opportunity to participate and to submit comments.</p> <p>World Relief is an international Christian nonprofit organization founded by the National Association of Evangelicals (NAE) in 1944 to assist victims of World War II. The mission of World Relief is to empower the local church to serve the most vulnerable. Since 1979, World Relief has resettled roughly 300,000 refugees and currently offers programs to encourage family integration to refugees, asylees, victims of human trafficking, and other immigrants in the United States. Immigration legal service programs include family reunification, citizenship preparation, applications for employment authorization, and a variety of other services. World Relief provides immigrant legal services through attorneys and Department of Justice accredited representatives in numerous states in the U.S. The organization currently has 17 active recognized and accredited sites and is offering technical legal support to 40 church-based programs who are either currently recognized and accredited or in the application process.</p> <p>World Relief appreciates the desire of USCIS to ensure that all immigration applications are processed and adjudicated efficiently and effectively. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence do not achieve this goal and they create barriers for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>Significant Burden on Individuals Applying for Immigration Benefits</p>

ID	Comment.	Commentor	Comment
861	USCIS-2010-0008-0950	Brian Schaeffer on behalf of the Refugee and Immigrant Center for Education and Legal Services (RAICES)	<p>Comment part 1 Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Refugee and Immigrant Center for Education and Legal Services (RAICES) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Founded in 1986 as the Refugee Aid Project by community activists in South Texas, RAICES has grown to be the largest immigration legal services provider in Texas. With offices in Austin, Corpus Christi, Dallas, Fort Worth, Houston and San Antonio, RAICES is a frontline organization in the roiling debate about immigration and immigrants in the world. As an organization that combines expertise developed from the daily practice of immigration law with a deep commitment to advocacy, RAICES is unique among immigration organizations. A diverse staff of 130 attorneys, legal assistants, and support staff provide consultations, direct legal services, representation, assistance and advocacy to communities in Texas and to clients after they leave the state. In 2017, RAICES staff closed 51,000 cases at no cost to the client. Our advocacy and commitment to change are driven by the clients and families we serve every day as our attorneys and legal assistants provide legal advocacy and representation in an immigration system that breaks apart families and leaves millions without pathways to legal status.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible. The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for</p>

ID	Comment.	Commentor	Comment
1050	USCIS-2010-0008-1170	Jocelyn Duarte on behalf of the Salvadoran American Leadership and Educational Fund	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Salvadoran American Leadership and Educational Fund in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Salvadoran-American and Education Fund are a non-profit organization dedicated to helping communities of color and immigrants advocate for their civil rights and against unjust immigration laws. We also provide scholarships to help fund higher education for first-generation college students many who come from immigrant families. Our mission is to promote the civic participation and representation of the Salvadoran and other Latino communities in the U.S., promote the economic development and democracy of El Salvador, as well as to advocate for its economic, educational, and political advancement and growth. Our core values are social justice, advancing democracy, leadership development, education, and trust.</p> <p>For social justice, we are rooted in political access and economic prosperity. We promote progressive policy goals in the United States and throughout the world. As for advancing democracy, we advocate for all people with a special emphasis on Latinos, Central Americans, and immigrants in the United States and the people of El Salvador. Then, we promote leadership and offer opportunities to empower individuals and the community to lead efforts for social justice. We stress the importance of education and individual success in the community. We are a trustworthy organization. We aspire to uphold the trust of the community with transparency and mutual accountability.</p> <p>As an immigration legal service provider, we help over 500 people last year to become Citizens that many benefited from the fee waiver option. We are a local nonprofit organization, which helps provide free to low-cost legal support in the Los Angeles area. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a</p>

ID	Comment.	Commentor	Comment
584	USCIS-2010-0008-0709	Joaquin Uy, City of Seattle	<p>1 of 6</p> <p>Submitted via www.regulations.gov Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>My name is Joaquin Uy, a naturalized citizen of the United States. And I currently serve as the External Affairs Manager and Policy Advisor for the City of Seattle Office of Immigrant and Refugee Affairs (“OIRA”). I write to you in opposition to the Department of Homeland Security (“DHS”), United States Citizenship and Immigration Services (“USCIS”) proposed changes to fee waiver eligibility criteria (“Rule”), USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The estimated total population of Seattle is 730,400 people¹ , and of those, the U.S. Census estimates that 18 percent, or around 131,472 individuals, are foreign-born² . Of these immigrants, the majority contribute to the city’s economy in a number of ways, whether by starting successful small and large businesses, paying taxes, or working in one of the many tech industries that support both the local and the national economies.</p> <p>Due in large part to the above statistics, and because Seattle (“City”) embraces its identity as a welcoming city, the government of the City has made great efforts to protect our immigrant and refugee</p>

ID	Comment.	Commentor	Comment
1461	USCIS-2010-0008-1228	Iris Bercovitz, SEAMAAC	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers. By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing some of the official eligibility letters or Notices of Action from the</p>

ID	Comment.	Commentor	Comment
1468	USCIS-2010-0008-1232	Sanaa Abrar, United We Dream	<p>Comment part 3: 1. This proposal will place a time and resource burden on people applying for fee waivers. By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request does place an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as</p> <p>applicants have already undergone current receipt of benefits by providing some of the official</p>

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1475	USCIS-2010-0008-1235	Katharyn Christian McGee, Duane Morris LLP	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicantgenerated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a selfgenerated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together. Third, the proposal eliminates an individual's ability to use proof of receipt of meanstested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a meanstested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This</p>

ID	Comment.	Commentor	Comment
1269	USCIS-2010-0008-1059	Elizabeth Martin	<p>Comment part 1 Ms. Deshommes:</p> <p>I am writing to you as a volunteer attorney working with OCCORD, a non-profit organization located in Orange County, California to oppose the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>In my capacity as a volunteer attorney overseeing fee waiver applications I am very familiar with the issues involved in working with immigrants applying for naturalization and requesting a fee waiver. Legal forms are a challenge for attorneys familiar with the law, for those unfamiliar with the law the forms are confusing and very difficult to complete. These hardworking, law-abiding people give far more to this country than they take so making it more difficult for them to prove that they qualify for a fee waiver is tantamount to taking away their legal right to become citizens of the United States.</p> <p>The proposed changes to fee waiver eligibility criteria and accepted forms of evidence create a significant burden for immigrants, federal agencies, and service providers. If USCIS makes changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal places a significant burden on individuals applying for immigration benefits.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. The current I-912 consists of 22 pages. Requiring a husband and wife using the exact same evidence to apply for a fee waiver is a waste of tax dollars, preparer time and your own staff time. This is not going to speed up the process, or make it more efficient. It creates far more paperwork for applicants and USCIS staff to deal with. And the additional cost of printing, copying, preparation, postage and USCIS staff time to sort and scan more fee waivers, additional space to store and postage to return applications that have technical flaws or lack documents.</p> <p>In addition, the proposal narrows the universe of evidence to prove eligibility for a fee waiver. Many individuals do not file tax returns because they are not required to do so based on income. It will preclude those most in need of the fee waiver from qualifying for lack of an unnecessary tax filing. A. This proposal will negatively affect the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p>
948	USCIS-2010-0008-1022	Laura Flores- Dixit, California Rural Legal Assistance Foundation	Comment part

ID	Comment.	Commentor	Comment
837	USCIS-2010-0008-0971	Vaughn Cox, La Union del Pueblo Entero (LUPE)	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I am writing on behalf of the more than 8,000 members of La Union del Pueblo Entero (LUPE) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>LUPE provides affordable immigration services to low-income families along the Texas-Mexico border. Many of our clients rely upon fee-waivers to be able to afford the immigration benefits for which they are qualified. Without the fee waivers, hundreds of eligible immigrants would be 'priced out of the market for those immigration services we offer.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form 1-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fees associated with various immigration benefits can be an insurmountable obstacle for our</p>

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1106	USCIS-2010-0008-1226	Michelle Seyler, Central American Resource Center - Los Angeles	<p>Comment part 1: Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 – Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21102 Filed November 27, 2018; 83 FR 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Central American Resource Center (CARECEN), Los Angeles, in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services’ (USCIS), proposed changes to fee waiver eligibility criteria. Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the federal register on September 28, 2018.</p> <p>CARECEN was founded in 1983 by Salvadoran refugees who fled the civil war in El Salvador to seek safety and shelter in the United States. We have since grown to be the largest grassroots organization in the country serving Central American immigrants. CARECEN’s legal department provides direct legal services to approximately 25,000 individuals each year. We also have a robust organizing department and Day Laborer Center. Our mission is to empower all immigrants by defending their human and civil rights, working for social and economic justice, and promoting cultural diversity.</p> <p>CARECEN’s legal services department is comprised of multiple units including Naturalization and Family-Based immigration, our Special Victims Unit (which completes U visa, VAWA, and T Visa applications), DACA, and Deportation Defense. As such, we provide a wide range of services to the immigrant community in Los Angeles and are experts in the challenges that these individuals and families face. The vast majority of our clients are low income and the fee waiver can be a life-changing option for them.</p> <p>As of 2016, California was home to more than 10 million immigrants, or about one quarter of the foreign-born population nationwide. In February 2017, the Pew Research Center released a report that found that 10 percent of the country’s undocumented immigrants, or 1,000,000 people, live in Los Angeles County and Orange County.</p>

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980	USCIS-2010-0008-1067	Tamara Shehadeh- Cope, Community Justice Project	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Community Justice Project in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Community Justice Project (CJP) is a non-profit, legal aid law firm that is part of Pennsylvania’s Legal Aid Network. We defend the rights of low-income Pennsylvanians by challenging policies and practices that cause hardship to our clients and their communities. We fight for improvements to public benefits, increased access to affordable housing, better pay for workers, and other issues that include immigration legal representation before the Department of Homeland Security (DHS).</p> <p>Our offices in Reading, Harrisburg, Hazleton, Pittsburgh and Scranton provide victim-centered, trauma-informed advocacy to victims of domestic violence, sexual assault, and similar crimes. We provide legal representation to survivors seeking protections under the Violence Against Women Act, in applying for U or T Visas, or in</p>

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937	USCIS-2010-0008-1007	Salvador Sanabria, Salvadoran American Leadership and Educational Fund	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of El Rescate in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>El Rescate is a non-profit organization that provides pro bono and low-cost legal representations to persons in removal proceedings as well as to persons applying for affirmative immigration benefits with the U.S. Citizenship and Immigration Services. El Rescate primarily serves low-income individuals that cannot afford the legal fees of a private immigration services. El Rescate mainly serves residents from the Los Angeles metropolitan area, but it also serves clients that come from as far as the Central Valley and the Inland Empire. The clients originate from an array of regions around the world, including, but not limited to, Central and South America, Africa, and the Middle East.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would impose a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee</p>

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957	USCIS-2010-0008-1033	Monica Glick, Public Law Center	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Public Law Center (PLC), located in Santa Ana, CA, in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Public Law Center is Orange County, California’s primary pro bono law firm, providing legal services free of charge to low-income residents in the areas of consumer, housing, immigration, veterans, health, family, and legal assistance for community organizations. From July 1, 2017 to June 30, 2018, Public Law Center’s Immigration Unit directly served 1,609 individual immigrants (benefiting an additional 4,000 household members), primarily with applications for relief for victims of crime (U Visas), victims of trafficking (T Visas), asylum, special immigrant juvenile status, victims of domestic violence (VAWA), and naturalization. During the same time period, the organization’s entire slate of legal service programs served nearly 8,000 immigrants, including over 1,000 clients who reported Spanish as their primary language. Approximately 913,000 immigrants live in Orange County, California, making up nearly one-third of the county's population. Latin America accounts for 44.8% of Orange County's foreign-born population and Asia accounts for 45.2%. The top three countries of birth are Mexico, Vietnam, and Korea.</p>

ID	Comment.	Commentor	Comment
1071	USCIS-2010-0008-1191	Koriel Jock	<p>Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a</p>

ID	Comment.	Commentor	Comment
1115	USCIS-2010-0008-1235	Katharyn Christian McGee, Duane Morris LLP	<p>Comment part 1: Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 Re: DHS Docket ID USCIS - 2010-0008, OMB Control Number 1615-0116 Comments in Response to Proposed Rulemaking: Request for Fee Waiver: Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>We are writing as Pro Bono Partner and Pro Bono Counsel for Duane Morris LLP in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services' (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Pro bono service has been an integral part of Duane Morris' culture and the backbone of our value system since the Firm's founding more than 110 years ago. Each year, Duane Morris attorneys provide more than 35,000 hours of pro bono legal services (equating to three percent of the Firm's total hours) to individuals, families, organizations, and small-businesses through more than 700 active pro bono matters. Through these services we try to level the playing field for the poorest residents in our communities. Our representation in housing, disability benefits, veterans affairs, healthcare eligibility, elder abuse, immigration, domestic violence protection, and expungement helps our clients to secure justice and restore basic necessities: shelter, income, employment and security. Our pro bono practice also includes representation of nonprofits and community-based organizations that contribute to the welfare and well-being of communities and</p>

ID	Comment.	Commentor	Comment
1116	USCIS-2010-0008-1236	Maricela Gutierrez on behalf of Services, Immigrant Rights, and Education Network (SIREN)	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 November 27, 2018</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Services, Immigrant Rights, and Education Network (SIREN) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>SIREN is a non-profit organization whose mission is to empower low-income immigrants and refugees in Northern and Central California through immigration legal services, policy advocacy, community organizing, and civic engagement. For 31 years, SIREN has been providing free and low-cost immigration services and our diverse clientele are individuals who are struggling to make ends meet as they work tirelessly to contribute to the economy and society. One of our key legal services is naturalization application assistance and many of our clients seek fee waivers in order to affordably attain citizenship given the exorbitant cost to apply. In fact, at least 20% of our naturalization clients seek fee waivers and any restrictions on the waiver process will have a devastating impact on those whom we serve.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documents and evidence accepted in order to establish eligibility for fee waivers in order to</p>

ID	Comment.	Commentor	Comment
490	USCIS-2010-0008-0641	Damary Rodriguez	<p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>I have worked as an advocate at my local rape crisis center and worked with immigrant survivors of sexual and domestic violence. Survivors of gender based violence face many barriers to getting help including economic abuse, language inaccessibility and poverty.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p>
781	USCIS-2010-0008-1059	Elizabeth Martin	Comment part

ID	Comment.	Commentor	Comment
786	USCIS-2010-0008-1107	Omar Carrera on behalf of Canal Alliance	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I am writing on behalf of Canal Alliance in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Canal Alliance is a nonprofit organization based in San Rafael, California. Canal Alliance launched its legal service department in 1998 to provide immigration legal services to Marin County’s low-income population.</p> <p>With an immigration legal service department and a social service department that serves this demographic every day, Canal Alliance can see the negative impact that such proposed changes would have in our community. Each year, Canal Alliance serves around 4,000 people and its immigration legal service departments helps over 1,600 clients with their immigration needs. We serve an aging immigrant population that would have to choose between accessing health care services to stay healthy and be able to work or possibly be affected by trying to keep their family together in the United States. Our organization also serves immigrant mothers who will have to choose between buying groceries for their U.S.-born children or staying in the United States.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for immigration</p>

ID	Comment.	Commentor	Comment
1182	USCIS-2010-0008-0763	Patti Seger on behalf of End Domestic Abuse Wisconsin, the Wisconsin Coalition Against Domestic Violence (End Abuse)	<p>Comment part 2: I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities. The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible. The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents. Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p> <p>The current filing fees are cost prohibitive, especially for large families. For example, if a domestic abuse survivor files for U Nonimmigrant Status and needs to file a Form I-192, Application for Advance Permission to Enter as a Nonimmigrant, for herself and for each of her four children, the cost would be a whopping \$4,650 for the family. A family fleeing violence often does not have access to that kind of money. If the fee waiver process is made more difficult and inaccessible, families like this might be effectively barred from seeking status. Families fleeing violence often do not have access to important paperwork necessary to prove things like annual income and expenses. It may also place a large family in the heartbreaking position of choosing which children should have the chance to apply for status based on what the family can afford. Obtention of valid immigration status is often a very important step to safety for immigrant survivors. It is also a path to life changing things like in-state tuition, federal financial assistance, and better paying employment, and the ability to petition for other family members.</p>

ID	Comment.	Commentor	Comment
964	USCIS-2010-0008-1043	Joshua Janet	<p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>I do not believe that the appropriate measure to assist with legal immigration is to create additional burdens for applicants and for the government. It is inhumane and inefficient.</p>

ID	Comment.	Commentor	Comment
1234	USCIS-2010-0008-1003	Margaret Russell on behalf of Mid Minnesota Legal Aid (Legal Aid)	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals keep copies on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail. Demonstrating proof of receipt of a means-tested benefit can take less than five minutes of a Legal Aid attorney's time. If the client signs a release of information form, it can be forwarded to the public benefits office with a request to provide verification of receipt of public benefits. Usually, within one week, oftentimes a day or</p>

ID	Comment.	Commentor	Comment
1354	USCIS-2010-0008-1022	Laura Flores- Dixit, California Rural Legal Assistance Foundation	<p>Comment part 1: November 27, 2018</p> <p>Advocate For ku Mite Samantha Deshommes Chief Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 Submitted via www.regulations.gov</p> <p>RE: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>California Rural Legal Assistance Foundation, Inc. (CRLA Foundation) writes this letter to fully express our opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>CRLA Foundation is a statewide non-profit civil legal aid organization providing free legal services and policy advocacy for California's rural poor. CRLA Foundation focuses on some of the most marginalized communities: the unrepresented, the unorganized and the undocumented. CRLA Foundation seeks to bring about social justice to rural poor communities by working to address the most pressing needs of the surrounding community, one of which is immigration legal</p>

ID	Comment.	Commentor	Comment
1347	USCIS-2010-0008-1017	Salvador Sanabria	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

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1355	USCIS-2010-0008-1022	Laura Flores- Dixit, California Rural Legal Assistance Foundation	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals requesting fee waivers. By only accepting fee waiver requests submitted using the Form 1-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver request. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already received a thorough income eligibility screening by</p>

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1361	USCIS-2010-0008-1033	Monica Glicken, Public Law Center	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers unnecessarily. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (such as through a letter or an affidavit) in compliance with 8 C.F.R. § 103.7(c), which address the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. Furthermore, the proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore in conflict with the agency's own existing regulations.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Given our client population, PLC believes that this will have a devastating impact on eligible applicants who are low-income. Receipt of a means-tested benefit is clear, indisputable evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that this ground of fee waiver has led to incorrect grants of fee waivers to individuals with sufficient means to pay. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

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1378	USCIS-2010-0008-1056	Leah Engle, Kentucky Equal Justice Center	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

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1384	USCIS-2010-0008-1067	Tamara Shehadeh- Cope, Community Justice Project	<p>Commente part 2:B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual’s ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

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1390	USCIS-2010-0008-1074	Emily Leung, Justice Center of Southeast Massachusetts LLC	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will place unnecessary burden on applicants, which is not required by regulatory guidance. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant within a household to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together. This requirement also ignores the practical reality of the interrelated nature of a family's financial status. Especially in the case of married couples and families with minor children, financial documentation will be the same for numerous family members. Requiring separate fee waiver forms for members of the same household will result in unnecessary duplication, increasing the processing burden for USCIS and for individuals.</p>

ID	Comment.	Commentor	Comment
1400	USCIS-2010-0008-1163	Kristin Brown, Empire Justice Center	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers. By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing some of the official eligibility letters or Notice of Action from the</p>

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1407	USCIS-2010-0008-1170	Jocelyn Duarte on behalf of the Salvadoran American Leadership and Educational Fund	<p>Comment part 2: 1. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912 when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate an inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

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1415	USCIS-2010-0008-1176	Adoubou Traore, African Advocacy Network	<p>Comment part 2:</p> <p>B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS)</p>

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1420	USCIS-2010-0008-1180	Marita Etcubanez, Asian Americans Advancing Justice AAJC	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicantgenerated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a selfgenerated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual’s ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires.</p> <p>USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has</p>

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1430	USCIS-2010-0008-1191	Koriel Jock	<p>Comment part 2: This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees. Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals have one on hand. The proposed requirement will place an additional burden on individuals to form new documents and does not account for</p>

ID	Comment.	Commentor	Comment
1447	USCIS-2010-0008-1208	Leena Khandwala, The Legal Aid Society	<p>Comment part 3: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together. Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven</p> <p>current receipt of benefits by providing some of the official eligibility letters or Notices of Action</p>

ID	Comment.	Commentor	Comment
1450	USCIS-2010-0008-1221	Deana Gullo on behalf of Catholic Charities of Orange County	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

ID	Comment.	Commentor	Comment
1453	USCIS-2010-0008-1225	Jennifer Ocon, UpValley Family Centers of Napa County	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers. By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing some of the official eligibility letters or Notice of Action from the</p>

ID	Comment.	Commentor	Comment
1481	USCIS-2010-0008-1237	Jorge Baron on behalf of Northwest Immigrant Rights Project (NWIRP)	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers. By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing some of the official eligibility letters or Notice of Action from the</p>

ID	Comment.	Commentor	Comment
1446	USCIS-2010-0008-1208	Leena Khandwala, The Legal Aid Society	<p>Comment part 2:I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations, many of whom seek humanitarian relief, including relief under the Violence Against Women Act, U visas and T visas. More than 94% of domestic violence survivors experience economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking and other crimes who are unable to meet the stricter evidentiary requirements proposed.</p>

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752	USCIS-2010-0008-1003	Margaret Russell on behalf of Mid Minnesota Legal Aid (Legal Aid)	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I am writing on behalf of Mid Minnesota Legal Aid (Legal Aid) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Immigration Law Project at Legal Aid provides free legal services, largely full representation, to immigrants in Hennepin and Anoka counties whose net income is at or below 125% of the federal poverty guidelines. We prioritize assisting the most vulnerable immigrant populations, including refugees and asylees, survivors of domestic violence and sexual assault, those with serious medical conditions, and immigrant youth. The majority of our clients have incomes well below 150% of the poverty level and many of them receive means-tested benefits. We submit fee waiver applications in the vast majority of applications that we file as our clients usually are not able to meet their basic needs and are even less able to spend hundreds of dollars on immigration applications. Many of Legal Aid’s clients do not file a tax return because their income is less than the amount that requires the filing of a tax return.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. More troubling, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers. A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required</p>

ID	Comment.	Commentor	Comment
1136	USCIS-2010-0008-0608	Sonya Chung, Minkwon Center for Community Action	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

ID	Comment.	Commentor	Comment
743	USCIS-2010-0008-0779	Melissa Mora, Neighborhood Defender Service of Harlem	<p>Comment part 1:am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. work at a nonprofit organization in New York City that works with the immigrant community all around the city. In my role as a legal advocate I assist clients with a variety of their immigration legal issues, many of whom are of limited means or currently a public benefit. Our office aims to help members of the community in search of affordable and quality representation that they can't access otherwise access at private law firms.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications. I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities. The proposed changes require individual applicants for immigration benefits to use Form 1-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p>

ID	Comment.	Commentor	Comment
1105	USCIS-2010-0008-1225	Jennifer Ocon, UpValley Family Centers of Napa County	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of UpValley Family Centers in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>UpValley Family Centers operates family resource centers in rural Napa County, in the communities of Calistoga and St. Helena. We serve over 3,000 individuals each year with prevention programs and services that increase health and wellness for people of all ages and backgrounds. Our Immigrant Integration program staff are Department of Justice accredited, and provide immigrants with information and assistance on their path to becoming US citizens. Our services include: offering accurate information in English and Spanish about the requirements to become a US citizen; enrollment in free civics and ESL classes; assistance with filing the US citizenship application with USCIS; and when needed, assistance requesting a fee waiver. According to the Migration Policy Institute's "Profile of Immigrants in Napa County," 12,000 legal permanent residents reside in Napa County, and about 8,800 may be eligible to become citizens. Napa County's immigrants are less likely to be naturalized citizens than immigrants statewide (30% versus 37%). Together with three other nonprofit partner organizations in Napa County, we have assisted over 1,000 legal permanent residents to become U.S. citizens over the</p>

ID	Comment.	Commentor	Comment
1044	USCIS-2010-0008-1163	Kristin Brown, Empire Justice Center	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I am writing on behalf of Empire Justice Center in opposition to the Department of Homeland Security's (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Empire Justice Center is a statewide provider of direct legal services, training and policy advocacy in many practice areas, including immigration and public benefits. Empire Justice has provided immigrant legal assistance in Westchester since 1997 and, more recently, on Long Island. Empire Justice Center provides legal assistance to immigrants in matters relating to Violence Against Women Act (VAWA) petitions, U-Visa for crime victims, T-Visas for victims of trafficking, family reunification efforts, Deferred Action for Childhood Arrivals (DACA), Special Immigrant Juvenile (SIJ), employment/green cards and work authorizations. Our staff attorneys also handle deportation and asylum cases. A 2015 report by Fiscal Policy Institute estimated that Nassau and Suffolk Counties have a combined total of 526,000 immigrants, or nearly 20% of Long Island's population. Of these, approximately 270,000 are not proficient in English. In addition, the immigrant population includes an estimated 76,000 unauthorized immigrants. Due to increased violence and poverty in Mexico and Central America, many unaccompanied minors have also arrived on Long Island in the last few years in order to escape these conditions and to have a chance at a better life in the United States. Suffolk ranked third and Nassau ranked eighth nationwide for counties with unaccompanied children released to relatives or other sponsors as of the end of June 2016, according to federal statistics. The need for free immigration legal services on Long Island and in Westchester County is great, especially among children, victims of violence, and those who cannot afford the cost of applications for immigration benefits.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies and service providers. If USCIS were</p>

ID	Comment.	Commentor	Comment
1214	USCIS-2010-0008-1004	Molly Coe, Volunteers of Legal Service	<p>Comment part 2: I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities. The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible. The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p> <p>The clients served by the VOLS Immigration Project include DREAMers, survivors of violence, and those seeking the protection of the United States from countries where they would be unsafe, whether due to persecution or natural disasters. The filing fees for applications to obtain permanent residence, citizenship through derivation or naturalization, employment authorization, waivers of inadmissibility for U non-immigrants, and extensions of Temporary Protected Status (TPS) are prohibitively expensive for our clients, who are often teenagers or young adults. Approval of a fee waiver is often the difference between our clients being able to lawfully regulate their immigration status and remaining undocumented. With an application fee waived, our clients are more likely to be able to obtain stability and</p>

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1324	USCIS-2010-0008-0733	Suzanne McCormick on behalf of Immigration Center for Women and Children (ICWC)	<p>Comment Part 4: 2. The Proposed Revision Will Create Burdens for Service Providers Assisting Survivors.</p> <p>For over 20 years, usCIs has employed a flexible standard for survivor fee waivers to ensure they did not deter or deny eligible survivor applications. The stringent requirements that each family member will need their own 1-912 fee waiver and the limitations on documents to show income will cause unnecessary delay and burden for survivors and further drain the limited time, capacity and resources of service providers who assist them.</p> <p>In addition to harmfully affecting survivors of trauma, restrictive fee waiver policies are also having a negative impact on ICVVC Attorneys need to do additional work for each case, sometimes filing the application multiple times until the fee waiver is granted or until the applicant can scrape together the filing fee. This additional work has limited ICWC's capacity to serve new clients. Filing a 1-912 for each family member would only exacerbate the problem.</p>

ID	Comment.	Commentor	Comment
24	USCIS-2010-0008-0169	Alexandra Olins	<p>Proposed changes to the fee waiver are bad public policy.</p> <p>The proposed changes will place an undue burden on clients to prove their income status. This is currently easily done with a benefit letter from a state agency that has already assumed the high administrative burden of determining the individual's income. If we rely on tax returns alone, a significant portion of people will be unable to prove their income status because they are NOT legally required to file federal income taxes. The verification of non-filing form that is mentioned in the proposed rule change will NOT prove that the person is low-income. It only proves that they didn't file their taxes. This rule change could create a class of individuals who effectively have NO way to prove their income to USCIS, despite the fact that they ARE low income. This rule change would place a huge administrative burden on legal services providers that work with low-income clients. We are not in the business of providing affidavits regarding our clients' income. We have always used benefit letters, provided by the state, and there has never been a problem.</p> <p>A secondary issue is that people's income changes over the course of a year. and relying on income tax returns will cause further delay for clients seeking to naturalize. If a person that wants to apply now has had an income change since 2017, they will need to wait until they file their 2018 income taxes to apply for the fee waiver. With wait times for N-400 interviews approaching all time highs, why would USCIS want to create another delay for clients seeking to naturalize?</p> <p>There is no need for this revision. There is nothing wrong with the current verification process. This revision would create an unjust, and undue burden on clients that are eligible for the fee waiver.</p>

ID	Comment.	Commentor	Comment
372	USCIS-2010-0008-0517	Kate Mytty	<p>I am opposed to the proposed revision. Income should not be a determining factor for determining citizenship.</p> <p>This would be discriminating towards anyone who cannot afford the fee or, do not have access to retrieving their tax documents. Having worked with many immigrant communities in the United States, and also knowing how my family immigrated to the US, I have seen how difficult it can be to get official and legal documents from someone's home countries.</p> <p>Requiring income verification would place an unnecessary and inequitable burden on people.</p>
383	USCIS-2010-0008-0537	Melanie Skinner	<p>I object to the proposed revision to the fee waiver process. So many elderly folks with the lowest incomes are not required to file taxes so they use other accepted methods to verify their incomes to apply for the fee waiver. Changing verification requirements would make it impossible for many to prove their eligibility."</p>
384	USCIS-2010-0008-0532	Ruby Fenton	<p>I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes so they use other accepted methods to verify their incomes to apply for the fee waiver. Changing verification requirements would make it impossible for many to prove their eligibility. Please consider this proposal, Regards Ruby Fenton</p>
385	USCIS-2010-0008-0534	Justin Fenton	<p>My name is Justin Fenton and I oppose the revision to the fee waiver process. Elderly people at the lowest income levels are not currently required to file and they use other methods to verify their incomes to apply for the fee waiver. Please do NOT change the verification requirements.</p>

ID	Comment.	Commentor	Comment
386	USCIS-2010-0008-0530	Karien Brouwer	I object to the proposed revision to the fee waiver process. These proposed changes would deny access to relief for deserving immigrants. Many elderly people with the lowest incomes are not required to file taxes so they use other accepted methods to verify their incomes to apply for the fee waiver. Changing verification requirements would make it impossible for many to prove their eligibility.
387	USCIS-2010-0008-0535	Fulgencio Lazo	The proposed changes to the fee waiver eligibility process is a bad idea because it will be harmful to low-income immigrants, many of whom are not required to file income taxes. Since they don't need to file an income tax they will not be able to prove that they should be eligible for a fee waiver. Fee waivers are important for low income people, as they enable them to submit their paperwork and adjust their status, when they otherwise might not be able to afford this. We need to do everything possible to help hard working, eligible immigrants by providing fee waivers more easily.
388	USCIS-2010-0008-0533	Cecil Whitney	I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.
389	USCIS-2010-0008-0536	Ramona Fenton	I personally object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes so they use other accepted methods to verify their incomes to apply for the fee waiver. Changing verification requirements would make it impossible for many to prove their eligibility. Thanks for considering

ID	Comment.	Commentor	Comment
390	USCIS-2010-0008-0531	Ramona Fenton	I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes so they use other accepted methods to verify their incomes to apply for the fee waiver. Changing verification requirements would make it impossible for many to prove their eligibility. Please consider this proposal.
391	USCIS-2010-0008-0529	Mary Fenton	My name is Mary Lee Fenton and I oppose the revision to the fee waiver process. Many aging people at the lowest income levels are not currently required to file and they use other methods to verify their incomes to apply for the fee waiver. Please do NOT change the verification requirements.
392	USCIS-2010-0008-0528	Justin Fenton	I oppose the revision to the fee waiver process. The current process is also very burdensome and many aging people at the lowest income levels are not currently required to file and they use other methods to verify their incomes to apply for the fee waiver. Please do NOT change the verification requirements.
395	USCIS-2010-0008-0579	Lica Wada	The changes to require low income immigrants to provide a federal tax return when they are not required to file one creates unnecessary challenges to an already hard process. This will negatively impact low income immigrants and we should be making the fee waiver accessible to all low income applicants.
412	USCIS-2010-0008-0587	Beth Charpentier	I strongly oppose the proposed revision to the fee waiver process. Many elderly people and other marginalized populations with low incomes are not required to file taxes. They use other currently accepted methods to verify their incomes in order to apply for the fee waiver. We are creating extra, unnecessary work. Changing the verification requirements would make it impossible for many elderly and low-income people to prove they are eligible for the fee waiver. As a country, we need to be encouraging people to become citizens, not discouraging. I strongly oppose this change.

ID	Comment.	Commentor	Comment
417	USCIS-2010-0008-0554	Pragya KC	The proposed changes to the fee waiver program will negatively impact our immigrant and nonimmigrant communities. It targets individuals that are low-income, disabled, and/or elderly and cannot afford to pay the fees required to be with their families and loved ones. Furthermore, it also dissuades people from pursuing benefits that would provide them access to opportunities they are entitled to. These changes would really restrict immigration benefits to only those that can afford it and create additional hurdles for those who are low income. Please reconsider these changes as it will have devastating impacts for many low income individuals.
419	USCIS-2010-0008-0551	Ruby Fenton	I strongly oppose the proposed revisions to the fee waiver process. Older people at the lowest income levels are not currently required to file and they use other methods to verify their incomes to apply for the fee waiver. Please do NOT change the current verification requirements.
430	USCIS-2010-0008-0581	Joan Horn	I am very concerned about the proposed revision to the fee waiver process. Changing the verification requirement would make it impossible for many people to prove that they are eligible for many people to prove that they are eligible for the fee waiver.

ID	Comment.	Commentor	Comment
453	USCIS-2010-0008-0594	Cheryl Lee	<p>Fee waiver has helped thousands of legal immigrants in the time of financial struggles while moving on to their citizenship dream. However, the possible change of fee waiver will add on the financial burden for those who are eligible for the waiver when tax return would become the only form of proof of income. Those who are not required to file federal income taxes because of lowest incomes, such as many elderly who receive SSI, will have no way to prove their income and qualify for the fee waiver. While the purpose of fee waiver is to help those in need, the change will make it impossible to fulfill its main purpose. Those with the lowest incomes should not be prevented from becoming citizens because of changing standards to prove their eligibility.</p> <p>Therefore, I urge the federal government to remove this barrier from the most vulnerable population. Thank you.</p>
464	USCIS-2010-0008-0615	Eric Carlson	<p>I object to the proposed revision to the fee waiver process. Since numerous elderly people with the lowest incomes are not obliged to file taxes they use other accepted methods to verify their incomes to apply for the fee waiver. Therefore, modifying the verification requirements would make it difficult to impossible for many to prove their eligibility.</p> <p>Eric E. Carlson</p>

ID	Comment.	Commentor	Comment
484	USCIS-2010-0008-0616	Cheryl Brower	<p>Re: Docket ID USCIS-2010-008. I am opposed to the proposed revisions in the regulations for Fee Waivers because it is an extreme hardship for low income legal residents and is inefficient, unnecessary and burdensome for the government reviewers. By only accepting tax returns in order to qualify as low income for the waiver, you are placing a heavy burden on people who are sufficiently low income that they do not need to file yearly taxes if below the filing income requirement. This would now require every person interested in the fee waiver to have to file taxes, an added cost and burden, and would only provide information once a year thus delaying the waiver request. In the past, a means tested benefit letter has been acceptable and this should continue to suffice for the fee waiver determination.</p> <p>I volunteer in a citizen class for legal permanent immigrants and am personally aware of the challenges faced, not least being the costs of the citizenship applications and green card renewals. Many in the class are elderly and retired or unable to find profitable work. Others work difficult shifts as food service workers, janitors and home care providers, often at minimum wage, yet come to class tired but determined to become U.S citizens. All are struggling to improve English language skills.</p> <p>I also volunteer at AARP tax aide clinics which are geared toward helping low income people file their taxes. We simply don't have enough volunteers to offer free tax filing assistance for the many people who are below the filing threshold and not due a tax refund.</p> <p>This regulatory change does not improve screening of legal permanent residents for the fee waiver. Instead it is intended to add another unnecessary burden to those seeking citizenship. The changes should not be implemented.</p>
491	USCIS-2010-0008-0601	Justin Fenton (3rd Comment)	<p>Please consider my formal objection to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes so they use other accepted methods to verify their incomes to apply for the fee waiver. Changing verification requirements would make it impossible for many to prove their eligibility</p>

ID	Comment.	Commentor	Comment
1161	USCIS-2010-0008-1101	Sharone Kaufman, Catholic Migration Services	<p>Comment part 2: Burden on Applicants</p> <p>Employment Authorization Documents: Many of our clients have pending asylum cases before the Asylum Office or Immigration Court. Before the introduction of the 2 year validity of these permits — a recent development — many of these people could not file tax returns before the renewal was required, but could obtain Medicaid through PRUCOL and thus apply for a fee waiver for the renewal of their document. This allowed for these applicants to continue to lawfully work in the United States, file their tax returns, and continue to provide for themselves and their children. There remains a large number of asylum applicants in this situation who would be needlessly affected by this proposed change.</p> <p>Lawful Permanent Resident Card Renewals: A large number of our clients file Form 1-90 to renew or replace their permanent resident card (green card). Our clients are sometimes homeless; have not made enough income the previous year to be required to file tax returns; or are elderly and are supported by one or more of their children, to name just a few specific circumstances we commonly see. These applicants may not have a financial hardship as understood by USCIS but would be otherwise eligible for a fee waiver due to being a recipient of a means-tested benefit. Many employers require valid lawful permanent resident cards to continue or begin employment; other agencies such as the New York State DMV require a valid green card to issue a state identification document; and yet others will deny medical benefits to those without a valid permanent resident card. These examples show the potential unintended consequences for immigrants of this proposal.</p> <p>Adjustment of Status Applications: A significant number of our clients adjusting status to permanent residents are asylees. This is a population that is statutorily allowed, and in fact, encouraged to receive means-tested benefits as they adapt to life in the United States. Like other clients discussed previously, this population may not always have sufficient proof to show they are eligible for a fee waiver based on the previous year's tax returns or a current financial hardship but can produce a means-tested benefits award letter. This means that many asylees will be forced to abstain from becoming lawful permanent residents solely on the basis of being unable to pay for the fees and not having the ability to submit a fee waiver application.</p>

ID	Comment.	Commentor	Comment
1334	USCIS-2010-0008-0999	Neal Dudovitz, Neighborhood Legal Services of Los Angeles County	<p>Comment part 6: 6. The new rule does not provide clear standards for proof of inability to pay. Finally, the proposed rule does not provide clear guidelines regarding what type or amount of evidence will be considered adequate to demonstrate an applicant's inability to pay. This vagueness is bound to compel applicants to submit reams of paperwork to prove their inability to pay — paperwork which may be irrelevant and therefore largely disregarded by DHS — and is likely to result in inconsistent decisions that will confound both adjudicators and the public. The operational burden of administering all of this would fall on U.S. Citizenship and Immigration Services (USCIS) and, potentially, on the Board of Immigration Appeals — both already overstretched agencies — deepening nationwide case processing delays.</p> <p>7. Conclusion.</p> <p>Instead of promoting efficiency and fairness, this proposed change creates redundancy, wastes time, and discriminates against low-income applicants by placing an additional hurdle in their path to obtaining immigration benefits. The new rule also lacks clear standards for proof and will lead to many improper denials and lost opportunities to receive immigration benefits. Those who qualify for immigration benefits should not be punished for their inability to prove their poverty and financial hardships. The rule will burden applicants, legal organizations, and USCIS itself, and will allow the fee waiver determination to overtake merits adjudication, contrary to legislative intent. For these reasons, we respectfully request that USCIS withdraw the proposed change to Fee Waiver Requests.</p> <p>Thank you for your consideration of our views. Please contact Neal S. Dudovitz at the telephone number and address listed above for further information. Sincerely, NEIGHBORHOOD LEGAL SERVICES OF LOS ANGELES COUNTY</p> <p>6 NEAL S. DUDOVITZ, Executive Director AMY GOLDMAN, Supervising Attorney BOZA PETROVYAN, Fellow</p>
399	USCIS-2010-0008-0558	Aliyah Vinikoor	<p>As the granddaughter of immigrants, I object to the proposed revision to the fee waiver process. We need to ensure that we're not creating unnecessary and immoral barriers for people with the lowest incomes to access immigration statuses. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p>

ID	Comment.	Commentor	Comment
1121	USCIS-2010-0008-1241	Kristen Navaluna, OneAmerica	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1122	USCIS-2010-0008-1242	Rich Stolz, OneAmerica	Multiple attachments from OneAmericia mass mailing campaing. For more infomration go to regulations.gov
619	USCIS-2010-0008-0885	Sarah Eaton	<p>I am against this rule change. I work as an advocate for people with disabilities. I am worried that this proposed rule change will disproportionately affect people with disabilities. Many people I work with receive SSI and have no other source of income. Therefore, they arent required to file federal income tax and may face other barriers to filing income tax. These barriers could include accessibility issues and inability to pay someone to help them.</p> <p>Furthermore, if you receive SSI, you have already been adjudicated by a federal agency to have low income and would be unlikely to be able to pay these fees.</p> <p>This proposed rule change will negatively affect the ability of people to apply for immigration application fees for benefits for which they are eligible.</p>

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703	USCIS-2010-0008-0890	Libby Palmer	<p>November 26, 2018</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Jefferson County Immigrant Rights Advocates (JCIRA) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>JCIRA serves immigrants on the Olympic Peninsula, in Washington State, a rural area two hours from Seattle and the governmental offices to be found there. Public transportation on the Peninsula is limited, as are legal services. In fact, there is not a single immigration lawyer office on the Peninsula. Many of the proposed changes to waiver fees would create an unnecessary burden to applicants. Instead, JCIRA urges USCIS to expand the types of documentary evidence accepted to establish eligibility for fee waivers.</p> <p>Furthermore, immigrants applying for various immigration benefits, such as a naturalization application, currently face fees that are obstacles, rather than aids, to successful completion. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p>

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465	USCIS-2010-0008-0644	Joseph Lachman	<p>I am absolutely opposed to this change. It causes needless waste of taxpayer money and puts an even larger burden on the most vulnerable communities.</p> <p>If tax returns alone are a viable means for income verification, people with the lowest incomes will have an extraordinary burden to prove their income status because they are discouraged from filing federal income taxes since their incomes are below the minimum required for filing, which leaves them with no way to prove their income and qualify for the fee waiver. This puts a disproportionate burden on low income immigrant families to prove something that should already be obvious through their means-tested benefits documentation.</p> <p>This is simply another way to punish immigrant families for not being wealthy and I absolutely oppose it. This proposal will potentially result in taking over \$120 million dollars annually out of the pockets of low income immigrant families, and this would hurt communities across the country who are already overburdened.</p>

ID	Comment.	Commentor	Comment
1350	USCIS-2010-0008-1021	Christine Chen, Asian Americans Advancing Justice - Los Angeles	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>The proposal eliminates an individual’s ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to once again prove their eligibility to USCIS. Receipt of a means-tested benefit is reliably competent evidence of qualification for a fee waiver, whereas adjudicators’ evaluation of income and financial hardship would be more subjective, and the results less predictable. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who are already facing the economic challenge of paying for application fees, with a more effort-intensive process and less assurance of success.</p> <p>Under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals keep copies on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail. Given that a majority of the</p>

ID	Comment.	Commentor	Comment
371	USCIS-2010-0008-0522	Alycia Moss	<p>My comments are as follows:</p> <p>One of the main issues with the proposed rule change there is no justification given for elimination of public benefits basis. All across the US, individual incomes and living expenses are vary widely, which affects their ability to pay. This makes no sense.</p> <p>This rule will burden on USCIS when the public benefits agencies already did the work. Moreover, applicants are burdened with having to spend more time and money to get documents on the list. Community based organizations are burdened with time and expense to change procedures, determine who can be helped or not, which could lead to limits on access to counsel if people are turned away</p> <p>Other agencies, employers, and community groups will be burdened by document requests from applicants, especially IRS. Everyone will be burdened.</p> <p>In fact, communities are burdened when people cannot legalize or naturalize - improving status/citizenship results in higher earnings, tax payments, contributions to society, etc. affecting all Americans -- Immigration benefits and citizenship shouldnt be just for the wealthiest. The little guy contributes to the American economy in significant ways. Those blue collar workers are the backbone of the US.</p>

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400	USCIS-2010-0008-0573	Andrew Huntington	<p>To whom, it may concern.</p> <p>My name is Andrew Huntington. I am a nurse practitioner in Seattle. I oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I am a volunteer for the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I work primarily with homeless and low income individuals in Seattle who struggle so hard to make ends meet and to care for the members of their family. I know first hand how much every last cent makes to people who are in need. Getting these fees waived is the difference between families being together and individuals being able to feel safe and secure.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is too expensive for many people. I oppose the rule for these reasons</p> <p>The proposed revision is not necessary and will unfairly burden applicants, especially on the lowest income, elderly and disabled people who are not required to file tax returns. At our one-day workshops, it takes about 10 minutes to fill out a fee waiver application for someone receiving an approved means-tested benefit. Income-based fee waivers require more evidence and can take hours to prepare. They require the most recent years tax return and pay stubs from the last three months, or a combination of other income evidence, such as a tax transcript or proof of unemployment payments. Gathering this evidence could take someone weeks, and so and we would not be able to assist these applicants at our workshops. For many people - due to language, geography or cost - these one-day citizenship clinics are their only opportunity to access application assistance.</p> <p>The rule will cost USCIS more in staff time spent scrutinizing income and tax information due to the extra documentation required. USCIS should focus its efforts on eliminating backlogs 753,352 in the U.S. and 18,707 in Seattle rather than implementing changes that could lead to an increase in backlogs. More officer time spent adjudicating complicated fee waivers means less time adjudicating the backlog of long-pending applications.</p> <p>American values should include equal access to immigration and citizenship benefits regardless of wealth. This rule violates that value. I ask you, what kind of country do you want to live in? One that helps to support everyone to be their very best? We are the richest country in the history of the world, but what does that matter if we don't care for the most vulnerable among us?</p> <p>Thank you for your time and consideration.</p>

ID	Comment.	Commentor	Comment
598	USCIS-2010-0008-0858	Christina Guros	<p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria because it wastes time and resources for applicants and the government.</p> <p>Under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement.</p> <p>The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals keep copies on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail.</p> <p>This changed requirement also goes against informal USCIS policies. In the past, USCIS interviewing officers have required applicants provide tax returns for the period of eligibility for US citizenship and have balked at federal tax transcripts when applicants were unable to find copies of their tax returns. This change to a preference for transcripts will mean that each and every applicant will have to obtain a new document in order to apply for a fee waiver. Whereas many applicants would have their previous years tax return on hand, requesting a tax transcript is an additional step that no one who has not lost their tax returns would think to do. Therefore, USCIS is asking all applicants to spend additional time and resources to obtain additional documents. USCIS does this without justification of why a transcript would be preferable to a tax return.</p> <p>In fact, USCIS officers most often receive tax returns with income-based fee waiver requests. They are accustomed to reviewing tax returns and would less often encounter tax transcripts, again because most applicants have tax returns on hand and would not take the additional unnecessary step to obtain a transcript. Thus, USCIS will need to train its officers to review tax transcripts, wasting additional time and resources.</p> <p>USCIS claims to propose changes to the fee waiver process to streamline and make adjudication more efficient. Yet they are asking all applicants to obtain a new document from another federal agency, wasting resources at USCIS and the IRS. USCISs claim of efficiency is false and this proposed rule change is completely unnecessary and detrimental to applicants for immigration benefits, and the agency itself. For these reasons I oppose this rule change.</p>

ID	Comment.	Commentor	Comment
1150	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 3: II. The Proposed Form Change Restricting Means of Demonstrating Income Is Unnecessary and Overly Burdensome to Individuals and Agencies</p> <p>Individuals who do not receive a means-tested benefit may show inability to pay the prescribed fee by providing evidence that their income is at or below 150 percent of the federal poverty guidelines. USCIS proposes to make it far more challenging and burdensome to apply by narrowing the universe of evidence the agency would accept as proof of income-based eligibility for a fee waiver. Specifically, the proposal to require individuals to submit an IRS tax transcript or verification of non-filing, and the proposal to reject other credible evidence of income such as pay statements, W-2 forms, and tax returns, is an arbitrary and unnecessary restriction.</p> <p>A. Requiring an IRS Tax Transcript or Verification of Non-Filing Letter Would Create an Undue Burden on Individuals and Government Agencies</p> <p>The requirement that an individual requesting a fee waiver based on income submit an IRS tax transcript if they filed a tax return creates an evidentiary requirement that will limit access to the fee waiver. Individuals who file tax returns have ready access to copies of those returns; they also have their pay statements and W-2 forms. By contrast, it is uncommon for individuals to have tax transcripts on hand; they must take the additional step of requesting one from the IRS. Requiring tax transcripts rather than accepting copies of tax returns and pay statements makes the entire process of proving eligibility for a fee waiver based on income more onerous. There are multiple types of tax transcripts,⁸ and many pieces of information necessary to request transcripts,⁹ which may confuse and even prevent individuals from obtaining tax transcripts. For instance, to request a tax transcript online, an individual must not only provide their Social Security number, date of birth, filing status, and mailing address from their latest tax return, but also have access to an email account, their personal account number from a credit card, mortgage, home equity loan, home equity line of credit or car loan, and a mobile phone with their name on the account.¹⁰ While a request for tax transcript by mail requires less information, obtaining transcripts by mail takes a minimum of five to ten calendar days, delaying what should</p>

ID	Comment.	Commentor	Comment
1393	USCIS-2010-0008-1074	Emily Leung, Justice Center of Southeast Massachusetts LLC	<p>Comment part 5: IV. Conclusion</p> <p>Finally, in addition to our aforementioned objections and concerns, we believe that the agency has failed to justify or properly evaluate the consequences of the proposed changes. We would like to directly respond to the agency’s request for comments addressing the four points listed in the Federal Register notice.</p> <p>☐ (1) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility</p> <p>The proposed changes in collection of information are not necessary for the proper functioning or performance of the agency. The agency does not rely on the newly required information required by the changes – such as information contained within federal tax transcripts – nor will the elimination of information about means-tested benefit facilitate any improvement in the functioning of the agency. Furthermore, the changes do not provide any practical utility. In fact, in USCIS’s capacity as a benefit-granting agency, their responsibility to applicants and their ability to serve beneficiaries of humanitarian applications – no matter the income level of the applicant – is undermined by these proposed changes.</p> <p>☐ (2) Evaluate the accuracy of the agency’s estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used</p> <p>We do not believe that the agency’s estimate of the public burden resulting from these changes is accurate. Due to the complexity of the documents involved in supporting a fee waiver request, particularly for applicants who are unable to provide direct proof and must rely on affidavits from supportive social service agencies or individuals familiar with their situations, the compilation and review of their materials would certainly take more than the 1.17 hours that the agency estimated. Furthermore, the means through which the agency came to this number is not accurate. The agency provided no information about their process in finding this number and</p>

ID	Comment.	Commentor	Comment
1398	USCIS-2010-0008-1152	Hieu Nguyen, Korean Women's Association	<p>Comment part 3: This proposal will be burdensome for applicants and service providers. The income documentation USCIS proposes will create an unnecessary barrier for eligible people to clear in order to have their fee waivers approved:</p> <ul style="list-style-type: none">• For people who have not filed tax returns, the regulation requires applicants to get a "verification of non-filing" from the IRS. However, this document doesn't show income, or prove the person wasn't required to file. All it does is verify the person didn't file taxes. Further, it is only available after June 15 for the tax year, which will severely restrict when an applicant could file for naturalization.• Second, filings with the Internal Revenue Service (IRS) omit income not subject to taxation but relevant to fee waiver adjudication, such as Supplemental Security Income or personal gifts or inheritance.• In addition, if someone filed taxes for the last year, but they have since become unemployed, the proposed regulation directs them to submit either a 1.099 for the unemployment money they received, or if they are NOT receiving unemployment, a letter of termination from their employer. Not only is this time-consuming, it doesn't provide any useful information about the person's income or inability to pay.• Finally, the proposed regulations state: "If you do not have any income, or cannot provide proof of your income, describe your particular situation in detail in Part 3., Item Number 9. [hardship section] and submit a Verification of Non-filing from the IRS. Also, submit affidavits from religious institutions, non-profits, or community-based organizations verifying that the applicant is currently receiving some benefit or support from that entity and attesting to the applicant's financial situation." The regulation is essentially saying that, rather than accept a letter from a government agency certifying the person is low-income, USCIS would rather get a letter from a church verifying the person is low-income. The entire work defeats

ID	Comment.	Commentor	Comment
1437	USCIS-2010-0008-1199	Cecelia Levin, ASISTA	<p>***Comment did not paste well*** Comment part 3: A. USCIS must apply the “any credible evidence” standard. When creating the special protections for survivors, a bipartisan majority in Congress realized the evidentiary challenges that immigrant survivors often face and mandated the “any credible evidence” standard for these forms of relief.²⁰ USCIS has acknowledged and explained how and why they must apply this standard in survivor-based applications like VAWA self-petitions, visa and visa applications.²¹ In the context of VAWA self-petitions, for example, USCIS must consider “any credible evidence” and does not require that the survivor demonstrate the unavailability of primary or secondary evidence.”</p> <p>22 Moreover, “[a] self-petition may not be denied for failure to submit particular evidence. It may only be denied on evidentiary grounds if the evidence that was submitted is not credible or otherwise fails to establish eligibility.”²³</p> <p>Former INS guidance states:</p> <p>“[B]attered spouse... self-petitioners are not likely to have access to the range of documents available to the ordinary visa petitioner for a variety of reasons. Many self-petitioners have been forced to flee from their abusive spouse and do not have access to critical documents for that reason. Some abusive spouses may destroy documents in an attempt to prevent the self-petitioner from successfully filing. Other self-petitioners may be self-petitioning without the abusive spouse’s knowledge or consent and are unable to obtain documents for that reason. Adjudicators should be aware of these issues and should evaluate the evidence submitted in that light.”</p> <p>24</p> <p>The proposed revisions run counter to the “any credible standard” in three principal ways: 1) the elimination of the means-tested benefit criteria for the fee waivers, 2) the requirement that applicants must submit the Form 912 in lieu of an applicant’s declaration comporting with 8 CFR 103.7(c) and 3) the limitation on the evidence that USCIS will consider to demonstrate income eligibility for fee waivers (i.e., additional documentation like tax transcripts, verification of</p>

ID	Comment.	Commentor	Comment
358	USCIS-2010-0008-0488	Andrew Boes	<p>The removal of fee waivers creates an additional barrier in an already burdensome immigration process, particularly for those who are least equipped to overcome that burden. Our immigration system should be accessible, and substantial fees work against accessibility. There is an individual and public interest in making sure that all residents of this country are able to register and document their presence. The proposal to remove fee waivers makes the system less accessible and runs counter to the individual and public interest.</p> <p>The 1.3 million dollars that will be saved by eliminating the collection of this information come at a much greater cost--the cost of further disincentivizing participation in a legal immigration system. Regulatory changes should be consistent with an incentive structure that encourages participation in a legal immigration system. Effectively raising the costs of participating does the exact opposite.</p> <p>As such, I strongly oppose the proposed amendment.</p>

ID	Comment.	Commentor	Comment
58	USCIS-2010-0008-0209	Elisa Del Rosario	<p>I object to the proposed changes to the fee waiver process. Many people, especially the elderly, are not required to file taxes due to their low income. So they use the means tested benefits option in order to apply for the fee waiver. Due to their age, they likely don't work and therefore dont file an income tax return. It would be impossible for them to prove they are eligible for the fee waiver, if they are required to submit a tax return.</p> <p>The proposal will place an undue burden on future citizens to prove their income status. If we rely on tax returns alone, a significant portion of people will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver.</p> <p>I strongly oppose the proposed revision because many immigrants rely on the means tested benefits requirement to be able to apply for the fee waiver. USCIS would be punishing poor families and only rewarding those with higher incomes to become citizens. I urge you to drop this proposed change.</p> <p>-----</p>
103	USCIS-2010-0008-0251	Holly Grigsby	<p>The proposed change of requiring citizenship applicants to produce tax statements/returns (vs. currently benefits receipts) to prove they are low income in order to qualify for the \$700+ fee waiver is very problematic. For example, for the many seniors who want to naturalize but don't have any income.</p> <p>Increasing barriers for poor people to thrive and become empowered hurts all of us.</p> <p>Holly Grigsby Seattle, WA via Knoxville, TN</p>

ID	Comment.	Commentor	Comment
146	USCIS-2010-0008-0296	Alee Hadaya	<p>I vehemently oppose Regulation OMB Control Number 1615-0116.</p> <p>I oppose the proposal to eliminate the use of public benefits to qualify for the N-400 fee waiver. The N-400 filing fee of \$725 is expensive and oppressive!</p> <p>If tax returns alone are required for income verification, the lowest income earners will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver.</p> <p>Further, the \$725 will make it more difficult for the neediest in our society to have the opportunity to become citizens. Money should not be one of the factors when an individual is applying to be a citizen.</p>

ID	Comment.	Commentor	Comment
357	USCIS-2010-0008-0493	Christina Guros	<p>I vigorously oppose the rule change proposed by the Department of Homeland Security to make the fee waiver process more difficult because it would make nonprofit agencies suffer.</p> <p>Tax-exempt nonprofit agencies that provide immigration legal services to low- and moderate-income individuals, will be directly hurt by this proposed rule change. Legal services staff will need to spend more time with clients who previously would have used a letter showing they receive public benefits as sufficient evidence of their eligibility for a fee waiver request. For agencies with the mission to serve low-income individuals, they often do not assist anyone whose income is much higher than the federal poverty line. This generally means that a large portion of their clients receive public assistance. If the rule change were to go into effect, they would need to assist these clients in obtaining additional evidence of their economic need, aside from the government-issued assessment of their low-income status that they already have.</p> <p>Sometimes this new evidence will not available or would take significant time to gather. For example, a person who attends an appointment to renew his green card in May and who did not file federal income taxes for the previous year will have very few options to show proof of his economic need under the new rule. He could choose to file taxes, indicating his income is zero on the tax forms. He would likely need assistance in filing taxes, and most free tax assistance does not go beyond April. The tax filings listing zero income have previously been rejected by U.S. Citizenship and Immigration Services (USCIS), so this is not his best option.</p> <p>He could instead wait until June 15 to request from the Internal Revenue Service Verification of Non-filing status. This is a document that the IRS issues to indicate that an individual has not filed taxes. However, this form does not indicate why an individual did not file taxes, and would not, therefore truly prove economic need or low-income status. It is also unclear how long the IRS will take to process these forms assuming there is an increase in requests following this rule change.</p> <p>This person could also get an affidavit from a local nonprofit agency that assists this person financially, such as a local food bank or church that provides assistance. Many nonprofit agencies that provide assistance to the poor do so through administering benefits issued by the state or federal government. So, when asked to provide evidence of this assistance, they would likely defer to the status letter from the benefit granting agency, which would no longer be accepted by USCIS. For those agencies that are ready and willing to provide this affidavit, they may be unlikely to have a notary public on staff.</p> <p>Producing affidavits and getting them notarized also consumes time and resources that the agency may not have.</p> <p>Getting hold of any of the above documents is time consuming, and would be extremely difficult for many clients, especially those who are elderly or disabled, the</p>
437	USCIS-2010-0008-0549	Ramona Fenton	<p>I oppose the revision to the fee waiver process. Many elderly people at lower income levels are not currently required to file and they use other available methods to verify their incomes to apply for the fee waiver. Please do NOT change the verification requirements and make this more complex and difficult at this time</p>

ID	Comment.	Commentor	Comment
537	USCIS-2010-0008-0720	Elizabeth de la Fuente	I am really concerned about the changes that are being suggested for how people who are applying for US citizenship can show their eligibility for a fee waiver. Many low-income people do not have to file income tax returns, so to require them to do so seems an undue burden for people who are already under-resourced. This new requirement means that many families will not be able to prove their eligibility for the fee waiver, thus putting up a high financial barrier to becoming citizens. Think about all the people who came to the US with nothing and became successful entrepreneurs, adding to our economic success as a country. Why would we want to make things more difficult for new arrivals? It doesn't make sense! I oppose the suggested changes.
822	USCIS-2010-0008-0772	Anonymous	<p>Comment</p> <p>Income-based fee waivers require more evidence and are far more time-consuming and challenging to prepare. They require the most recent years tax return and pay stubs from the last three months, or a combination of other income evidence, such as proof of unemployment benefits. This documentation must be obtained from every person who contributes income to the household.</p>
871	USCIS-2010-0008-0734	CJ Kennedy	<p>Requiring income verification would place an unnecessary and inequitable burden on people. We should make it more accessible for fee waiver and not make it harder or impossible.</p> <p>This is a bad policy which I strongly oppose.</p>

ID	Comment.	Commentor	Comment
1035	USCIS-2010-0008-1150	Mason Wiley	<p>What is the point of making it more difficult for impoverished individuals to prove their income status and waive the insane filing fee required to file for naturalization? Are there reports of current verification methods failing to accurately report an individual or family's income? I suspect it's more likely that this is simply another way to punish the poor, as are so many policies under this administration.</p> <p>"Give me your tired, your hungry, your huddled masses yearning to be free."</p>
1049	USCIS-2010-0008-1169	Adrienne Pon on behalf of the City and County of San Francisco and the San Francisco Immigrant Rights Commission	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>On behalf of the City and County of San Francisco, I am writing to express my opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. The City and County of San Francisco and the San Francisco Immigrant Rights Commission strongly oppose the USCIS proposal to change the fee waiver eligibility criteria and accepted forms of evidence. The current standard is simple, reliable, and cost-effective. In contrast, the proposed change is complex and counterproductive. It would create an additional burden for immigrant communities and vulnerable individuals, as well as cause a significant additional burden on communities, service providers and cities.</p> <p>Immigrants are over a third of San Francisco's total population and over 70 percent of the City's immigrants are working age (25-64). A 2017 study by the bipartisan New American Economy (NAE) found that Immigrants in San Francisco bring over \$7.1 billion in spending power, and pay over \$2.5 billion in total taxes each year, with \$1.7 billion going annually to the federal government. Over a third of our small businesses are owned or operated by immigrants, and there are 12,576 immigrant entrepreneurs in San Francisco providing essential services and jobs. Numerous studies have shown that naturalization Improves economic mobility and has a significant positive economic impact on cities and local communities. According to a study by the Urban Institute, if all eligible immigrants in San Francisco were to naturalize now, it would represent an \$86 million annual fiscal gain for the City overall. Naturalization also typically increases aggregate earnings for families. In San Francisco aggregate earnings for families would increase by \$233 million if everyone eligible to naturalize did so. 1</p> <p>Nationally, immigrants continue to play an important role contributing to local economies as voters, consumers and taxpayers.</p> <p><small>1. Nationally, 10.4 million immigrants were eligible to vote in 2014, a group that could have</small></p>

ID	Comment.	Commentor	Comment
1169	USCIS-2010-0008-0968	Tana Liu- Beers, Disciples Immigration Legal Counsel	<p>Comment part 2: The proposed changes would place a time and resource burden on individuals applying for fee waivers.</p> <p>The proposed revision would require a family to submit individual applications for each family member with duplicate financial and tax documents for each person, rather than the current practice of allowing families to submit a single fee waiver application when filing together. Requiring each applicant to submit his or her own application with duplicate supporting documentation is a waste of resources and time for applicants, service providers, and adjudicators.</p> <p>The proposed revision would exclude receipt of means-tested benefits as acceptable proof of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is the most common and straightforward way to demonstrate fee waiver eligibility. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS.</p> <p>The proposed revision would require an applicant to obtain a federal tax transcript from the Internal Revenue Service (IRS), rather than accepting a copy of the most recent federal tax return. The government does not provide any reason why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents, and most individuals keep copies on hand. The proposed requirement would place an additional burden on individuals to submit more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for mail delays.</p>

ID	Comment.	Commentor	Comment
1418	USCIS-2010-0008-1179	Courtney Tudi, World Relief	<p>Comment part 2: Increased Time and Resource Burden on Legal Service Providers</p> <p>World Relief's Summary Position:</p> <p>☐ The workload created by proposed changes and additional evidence will reduce access to legal services.</p> <p>Discussion of World Relief's Position:</p> <p>The proposed changes in requirements and increased documentary evidence will stretch nonprofit capacity forcing sites to accept less clients. For World Relief and its affiliates, the greatest impact will be seen for naturalization applicants. It will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, nonprofit immigration legal service providers, including those in remote areas of the United States, organize workshops as an efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services. If fee waivers can no longer be efficiently completed, either in a workshop or one-on-one appointment setting, sites will be forced to reduce the number of individuals served.</p> <p>With the proposed changes to the fee waiver form, it will become harder for nonprofit legal service providers to complete applications involving a fee waiver. Organizations may stop providing assistance with fee waivers in the workshop setting or extend appointments to complete additional paperwork. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>World Relief appreciates the opportunity to provide comment for USCIS to consider. The proposal to increase the amount of evidence required and other suggested changes to the fee waiver eligibility criteria will create unnecessary and prohibitive obstacles for immigrant families seeking to fully integrate into their communities. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for fee waivers to</p>

ID	Comment.	Commentor	Comment
435	USCIS-2010-0008-0545	Mimi Boothby	<p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the strict evidence requirements imposed to prove eligibility. Do</p>
488	USCIS-2010-0008-0661	Wendy Ellison	<p>Please please please do not add the presentation of a tax return to apply for US citizenship. This is a big hardship on low-income people. It is a racist, classist, unloving response.</p> <p>this is NOT WHO WE ARE. TURN BACK NOW</p>

ID	Comment.	Commentor	Comment
601	USCIS-2010-0008-0945	Kelly Young	<p>I am opposed to the changes that are being suggested for how people who are applying for US citizenship can show their eligibility for a fee waiver. To require low-income people who do not have to file income tax returns to show their income status with tax returns adds an undue burden for them. This new requirement means that many families will not be able to prove their eligibility for the fee waiver, thus putting up a high barrier to becoming citizens.</p>
902	USCIS-2010-0008-0853	Elizabeth Tonne-Daims	<p>As an immigration attorney for the past 5 years I strongly oppose this proposed rule. The proposal constricts the evidential categories that can be submitted to prove eligibility for a fee waiver. The effect of the proposed changes will chill the desire of eligible individuals from filing for fee waivers and immigration benefits more generally.</p> <p>Further, the fee waiver application process will become burdensome due to the additional requirements. The amplified evidential requirements for the proposed amended Form I-912 will considerably increase the time and work required for both applicants to complete the form and adjudicators to process it. Many low-income noncitizens are not obligated to pay taxes because they do not make enough income, requiring the submission of certain IRS forms would be futile and a waste of resources. Additionally, the proposed changes render the form more difficult to process because the changes make the form far more complex to complete. The added complexity of the form will likely cause applicants to make more mistakes, and will act as a deterrent to fill out the form from the outset. Unfortunately, applicants who would otherwise be eligible may not be able to complete the form because of a lack of required documents.</p> <p>Essentially, requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. As an attorney who has worked with low-income noncitizens, these waivers have become integral to obtaining benefits for this diverse population, the chilling effect this proposed rule runs in contravention to our American principles of providing assistance to those less fortunate. This proposed rules restrictions will likely cause many eligible noncitizens not to seek benefits for which they are eligible, which would be truly shameful.</p>

ID	Comment.	Commentor	Comment
945	USCIS-2010-0008-1017	Salvador Sanabria	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of El Rescate in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>El Rescate is a non-profit organization that provides pro bono and low-cost legal representations to persons in removal proceedings as well as to persons applying for affirmative immigration benefits with the U.S. Citizenship and Immigration Services. El Rescate primarily serves low-income individuals that cannot afford the legal fees of a private immigration services. El Rescate mainly serves residents from the Los Angeles metropolitan area, but it also serves clients that come from as far as the Central Valley and the Inland Empire. The clients originate from an array of regions around the world, including, but not limited to, Central and South America, Africa, and the Middle East.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee</p>

ID	Comment.	Commentor	Comment
1055	USCIS-2010-0008-1175	Wendy Cervantes, Center for Law and Social Policy	<p>Comment part 1: Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services (USCIS) Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>The Center for Law and Social Policy (CLASP) is grateful for the opportunity to comment on the proposed changes to fee waiver criteria published in the Federal Register on September 28, 2018.</p> <p>Established in 1968, CLASP is a national, non-partisan, non-profit, anti-poverty organization that advances policy solutions for low-income people. Our comments draw upon the work of CLASP experts in the areas of immigration and anti-poverty policies. As a national anti-poverty organization, we understand the critical importance of ensuring that low-income immigrants are able to obtain immigration benefits for their own economic security as well as that of their families.</p> <p>CLASP opposes the Department of Homeland Security's proposed regulation regarding fee waivers. We urge that the rule be withdrawn, and that current guidelines remain in place. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrants and vulnerable individuals, impeding their ability to obtain immigration to the detriment of the long-term stability and economic mobility of immigrants, their families, and their communities. The rule also assumes that individuals who receive a means-tested benefit have the resources available to pay immigration fees.</p> <p>I. The proposed rule will impede individuals from obtaining immigration benefits, to the detriment of their and their families' long-term economic security and stability.</p> <p>Immigration fees represent a significant cost, especially for low-income families. Fees have continued to increase, with the fees for critical applications increasing by more than 20 percent in 2016.¹ Not accounting for additional biometrics fees, the application for lawful permanent residency (Form I-485) is now \$1,140, the naturalization application is \$640 (Form N-400) and the certificate of citizenship (N-600) is \$1,170.² As a result, many low-income immigrants would be priced out of</p> <p>important immigration benefits, and the opportunity and economic mobility that accompany them, without the ability to qualify for fee waivers.</p>

ID	Comment.	Commentor	Comment
1056	USCIS-2010-0008-1176	Adoubou Traore, African Advocacy Network	<p>Comment part 1: Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the African Advocacy Network (AAN) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Our office has four Department of Justice Accredited Representatives, one attorney, and two legal assistants who all find the current Fee Waiver process to be successful.</p> <p>AAN offers immigration legal services for African and Afro-Caribbean immigrants working towards securing a legal status and social integration in the USA. We are the only African Immigrant organization member of the city-wide San Francisco Immigrant Legal Education Network (SFILEN), an unprecedented consortium of thirteen legal services providers.</p> <p>We are also a member of the San Francisco Language Access Network (SFLAN), a network of eight organizations and the working to ensure that immigrants are served in culturally and linguistically matter.</p> <p>Our staff assists clients with Adjustment of status, Family petitions, Consular Processing, VAWA, U-Visas, Citizenship & Naturalization, Work Permits, Asylum applications, Temporary Protected Status Program (TPS) and removal defense. Several of these processes involve working with clients to request Fee Waivers and the</p>

ID	Comment.	Commentor	Comment
1060	USCIS-2010-0008-1180	Marita Etcubanez, Asian Americans Advancing Justice AAJC	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I write on behalf of Asian Americans Advancing Justice AAJC to oppose the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. We urge USCIS to withdraw this proposed rule on fee waivers.</p> <p>Asian Americans Advancing Justice AAJC (Advancing Justice AAJC) is a national non-profit, non-partisan organization founded in 1991. Our mission is to advance the civil and human rights of Asian Americans, and build and promote a fair and equitable society for all. Our wide-ranging efforts include promoting civic engagement, forging strong and safe communities, and creating an inclusive society.</p> <p>Since the summer of 2015, Advancing Justice AAJC has served as the site leader for the New Americans Campaign in the D.C. metropolitan area. In this role, Advancing Justice AAJC convenes D.C. area organizations that provide citizenship assistance in order to coordinate activities so that we can more effectively reach and serve eligible legal permanent residents in applying for naturalization. The eligible-to-naturalize population in the D.C. metropolitan area is large (222,279 individuals) and diverse, encompassing immigrants from all over the world.</p> <p>As an organization dedicated to serving Asian American, Native Hawaiian and Pacific Islander communities, we also note that as of the 2010 Census, there are nearly 750,000 Asian Americans and over 17,000 Native Hawaiians and Pacific Islanders (NHPI) in the D.C. metropolitan area.¹Since almost two-thirds of Asian Americans are foreign-born,² the Asian American population is a majority immigrant community that will be significantly impacted by the proposed changes. In addition, while Native Hawaiians are an indigenous population and therefore not immigrants to the United States, 2,400 NHPI in the D.C. area are foreign-born.</p>

ID	Comment.	Commentor	Comment
1101	USCIS-2010-0008-1221	Deana Gullo on behalf of Catholic Charities of Orange County	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Catholic Charities of Orange County in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Catholic Charities of Orange County's Immigration Services Program as a Department of Justice (DOJ) recognized agency with DOJ 12 accredited staff and 2 immigration attorneys, will continue to provide professional immigration legal services to predominantly low-income foreign-born individuals and their families needing assistance with matters before the U.S. Citizenship and Immigration Services, the Executive Office for Immigration Review, and the Department of State. Catholic Charities of Orange County's Immigration Services Program as a Department of Justice (DOJ) recognized agency with DOJ 12 accredited staff and 2 immigration attorneys, will continue to provide professional immigration legal services to predominantly low-income foreign-born individuals and their families needing assistance with matters before the U.S. Citizenship and Immigration Services, the Executive Office for Immigration Review, and the Department of State.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and individuals.</p>
433	USCIS-2010-0008-0588	Manny Lewis	<p>Making fee waiver eligibility less accessible to those who need it is incredibly unfair. To make so many people who aren't required to file income taxes all of a sudden charged to provide them in order to have their fees waived is wrong. There are already so many challenges faced by low-income immigrants, this is not only another unnecessary hurdle but it denies them a valuable resource in their efforts to become US citizens.</p>

ID	Comment.	Commentor	Comment
482	USCIS-2010-0008-0650	Ruth Battaglia	<p>Dear Ms. Deshommes:</p> <p>I am a member of a religious community of women who have served immigrants. I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Congregation of Sisters of St. Agnes, based in Fond du Lac, Wisconsin was founded in 1858 to serve the needs of the immigrant population settled between Milwaukee and Green Bay. We have helped to sponsor the settlement of Hmong and Vietnamese families in Fond du Lac and we currently have sisters in Arizona who provide pro-bono legal assistance for immigrants applying for a green card or for citizenship.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. I urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our countrys commitment to welcoming immigrants.</p> <p>Sincerely yours,</p> <p>Sister Ruth Battaglia, CSA Justice, Peace, Integrity of Creation Coordinator Congregation of Sisters of St. Agnes</p>
492	USCIS-2010-0008-0603	Pamela Knapp	<p>Currently, people with very low incomes who are unable to provide an income tax return are able to prove their eligibility for the fee waiver by other means. If these alternative methods to prove eligibility were to be eliminated, it would increase the burden on low income families and make it harder for them to receive a fee waiver for their citizenship application. For this reason, I am against the proposed changes.</p>

ID	Comment.	Commentor	Comment
493	USCIS-2010-0008-0634	Karin Guros	<p>I oppose the proposed revisions to the fee waiver eligibility process. The changes USCIS proposes will make proving eligibility for the fee waiver much more difficult for people who cannot afford the application fee to become U.S. citizens. The proposed revisions would also impact other immigration-related applications such as green card renewals, work permits, and certificates of citizenship for children. The proposed change is unjustified, needlessly complex, and counterproductive.</p> <p>As a teacher and volunteer in a low income community, I know that families often have incomes that do not require income tax returns and asking them to produce a tax return would place an undue burden on people who are otherwise eligible.</p> <p>I urge USCIS to withdraw the proposed revisions to the fee waiver eligibility process.</p>
497	USCIS-2010-0008-0667	Elliot Smith	<p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes. USCIS should not make it harder for them to receive a fee waiver for their citizenship application.</p>
605	USCIS-2010-0008-0937	John Lim	<p>I strongly oppose the proposed change to the fee waiver process. Eliminating the use of means-tested benefit letter to verify one's income would negatively impact individuals who are low-income, students, and the elderly as many in these groups are not required to file taxes and would therefore be unable to prove their eligibility for the fee waiver. This proposed change punishes those who are less fortunate and prevent them from for applying for citizenship without the fee waiver.</p>

ID	Comment.	Commentor	Comment
582	USCIS-2010-0008-0678	Bonnie Stern Wasser	<p>I oppose the proposed the fee waiver changes in USCIS Docket ID USCIS-2010-0008, OMB CN 1615-0116. As an immigration lawyer for 30+ years, I am familiar with immigration and citizenship applications and their high filing fees. I provide volunteer legal services to low income immigrants seeking legal status and citizenship. Many applicants for U and T visas, VAWA, and naturalization can't afford the filing fees. It takes about 10 minutes to prepare the fee waiver application for applicants with public benefits. However, income or economic hardship waivers take considerably more time and paperwork with a higher risk of lockbox rejection or USCIS denial. The rule clearly is intended to make it harder for the poorest people to apply. And because the rule is more work for USCIS, processing times or denials will increase. The rule does not streamline" or provide for "expedited review.</p> <p>1. The new rule disproportionately impacts the lowest income applicants, especially the unemployed, elderly, ill or disabled, students, young people, and homemakers.</p> <p>The rule will cost more money for nonprofits who serve low income applicants, and many would-be applicants may end up not applying at all. The rule will limit access to counsel and equal access to immigration and citizenship benefits even if eligible. New legal immigrants and citizens uplift all Americans by improving their income, access to opportunities, and civic engagement.</p> <p>2. This proposal will impose a time and expense burden on the most vulnerable applicants.</p> <p>Filing fees have become extremely expensive over the years. Congress, in its budgeting, and DHS in its reports, have indicated that citizenship in particular should be accessible and affordable. This rule does not accomplish that goal. Most of the applicants at citizenship workshops where I help need fee waivers, and of those, about 50% qualify under the public benefits ground. We turn away people needing hardship waivers because of the time involved. This rule also harms survivors of DV, sexual assault, human trafficking, and other crimes who are unable to meet the stricter income or hardship rules. By eliminating the public benefit ground, USCIS limits survivors access to legal protections, safety and justice, contrary to Congressional intent.</p> <p>3. The rule places additional burdens on other government agencies, employers, community organizations, and nonprofits to confirm income or employment status. It mandates use of IRS tax transcripts rather than allowing use of tax returns with proof of filing. These should be optional. It also mandates the unemployed or lowest earners obtain an IRS letter of non-filing. However, the IRS website says its verification of non-filing letter does not prove whether a person was required to file a return. This requirement is useless. The rule requires unemployed people to prove why they arent employed or when they were last employed, which could have been years ago. These are burdensome and unnecessary requests on other government agencies, employers, community groups and nonprofits. By contrast, a public benefits letter means a government agency has already done a means test probably under penalty of perjury. Why does USCIS want a letter from a community group or employer instead of a government issued document certified under penalty of perjury? This is unnecessary and inefficient.</p>

ID	Comment.	Commentor	Comment
499	USCIS-2010-0008-0645	Annette Holland	<p>I feel that the proposed changes to the fee waiver eligibility process are not good policy and will have negative effects in many ways including:</p> <ul style="list-style-type: none"> - harm to low-income immigrants - many of whom are not legally required to file income taxes. This means that some low-income immigrants that are legally eligible for the fee waiver will be unable to prove that they are eligible. This could result in their not applying to become U.S. citizens because they cannot afford the fee. Data shows that U.S. citizens earn more than green card holders. We should be doing everything that we can to make the fee waiver accessible to low-income immigrants. - will result in fewer green card holders becoming US Citizens. Withdrawing the benefits of Citizenship will hurt ALL Americans. Naturalized citizens earn more than LPRs and are more likely to be employed. LPRs preparing to naturalize learn English and study US history and government. Naturalized citizens are engaged in their communities and can vote and make decisions about the future of their country. - it will make USCIS less efficient, not more. At a time when processing times are longer than ever, this is a very bad idea. This policy change will make it harder for adjudicators at USCIS to determine whether applicants qualify for the fee waiver or not. In addition to spending considerable time adjudicating complex matters or household income, they would have to get training on how to do so. Agencies that work with LPRs will have to spend valuable time helping clients get their tax returns, if they filed them, from the IRS. Why would USCIS want to make application processing times longer and more complex now, when wait times are already longer than ever? USCIS can ill afford to implement a policy change that will further delay operations at this challenging time. <p>And finally I think it is a bad policy because it is unnecessary. In the absence of evidence that there is a problem with the current system, I ask as a concerned citizen, why is there any need for this change of procedure? If there is no problem with the current system, why do we need a remedy? The current system is not broken there is no reason to fix it!</p> <p>Thank you for taking my comment.</p>

ID	Comment.	Commentor	Comment
1203	USCIS-2010-0008-0751	Amy Lee, Jubilee Immigration Advocates	<p>Comment part 2:Many vulnerable and marginalized immigrants will have difficulty providing the documentary evidence required to qualify for a fee waiver under this proposal.</p> <p>Under this proposal, many of the immigrants we serve simply would not have other documentary evidence, such as tax returns, pay stubs or rent receipts, to prove that they are low income and qualify for a fee waiver. Some have only been in the U.S. for a short time. Many do not file federal tax returns because they do not earn enough money or their only source of income is means-tested benefits. Others have jobs where the employers pay them in cash. Many of our clients have struggled to pay their application fees because of recent erroneous denials of fee waivers based on receipt of means-tested benefits by various USCIS Service Centers .</p> <p>On several recent occasions, USCIS erroneously denied fee waivers for our clients who submitted the required proof of receipt of means-tested benefits. Most notably, USCIS erroneously denied fee waivers for the Form 1-751 for applicants who received Medicaid benefits. Because these clients were concerned that their conditional residence was close to expiring and did not want to risk being placed into removal proceedings upon expiration of their conditional residence, they took on the heavy financial burden of coming up with the \$680 fee. Some took out loans from financial institutions. Others borrowed money from family members or dug into their savings. If this proposal is implemented, more of our clients will struggle to pay their fees while trying to make ends meet and provide for their families.</p>

ID	Comment.	Commentor	Comment
509	USCIS-2010-0008-0646	Anonymous Anonymous	<p>I oppose this change. I assist legal refugees in their citizenship process. Many work full time jobs and also qualify for needs based assistance because of low wages. The Kentucky state agencies that oversee the needs based assistance (SNAP and Medicaid) conduct thorough screenings and require extensive documentation to verify family income. Using proof of needs based assistance for the I 912 form is a straightforward way to document that a person is low income. Under the proposed change, all applicant would need to submit tax and wage forms. This is a lot more documentation. Wages and family size change year to year. Getting several months of printed pay stubs can be difficult for those with no access to a computer and printer. I see no valid reason for this change, which will be an additional burden to USCIS officers who need to review more extensive and complicated documentation and for citizenship applicants who need to gather more documentation. The purpose seems to be to discourage people from applying for citizenship. I oppose this change.</p>

ID	Comment.	Commentor	Comment
669	USCIS-2010-0008-0799	MariRuth Petzing	<p>I am an immigration attorney working for a non-profit legal services organization that does extensive work with low-income immigrants, including survivors of child abuse, domestic violence and human trafficking, as well as elderly and disabled adults mostly in rural communities. I am submitting two comments, one on the requirement of using the increasingly complex I-912 form and one regarding the supporting evidence requirements.</p> <p>Eliminating proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee creates unnecessary and duplicative work. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. Additionally, documentation of means tested benefits can usually be obtained at a local office with which my clients are familiar in the mostly rural communities where my clients live. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee.</p> <p>USCIS's proposed changes requiring including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines instead of a copy of their most recent tax return will create additional barriers and delays while bringing no benefits. Copies of filed federal tax returns are documents most individuals have on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail.</p> <p>I work with clients who are illiterate and cannot write to request documents or use an online format. Many of my clients have no internet access, and even those with internet access have no means to print documents. Some live in areas without cell reception. Since my office serves a rural population, there is no IRS service office near to my client's communities. While a trip to a local state office to obtain proof of a means tested benefit may take 20 minutes and cost my clients less than \$5, a trip to an IRS office for assistance may take 2 hours and cost up to \$50 in gas and parking, not including lost income from time off work. Additionally, I work with many clients who speak indigenous languages who need assistance to request documents because services are not available in their language. By forcing applicants to obtain documents instead of using the documents that they already have on hand, USCIS increases the burden to the applicants, as well as to agencies that provide assistance as many of my clients would be unable to obtain such a document without assistance. Additionally, most of my clients would have to take time off work to obtain the help they need to get an IRS transcript which would cause negative impacts on their employers.</p>

ID	Comment.	Commentor	Comment
1104	USCIS-2010-0008-1224	Mary Lopez, OneAmerica	<p>My name is _Mary lopez. I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at citizenship clinics (# times/since year). I help at these workshops because _(what motivates you? Do you have family or friends who are immigrants? Describe their contributions to this country)_. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons: [Cut and paste ANY 2-3 reasons below, and customize further. Why is it important that citizenship be affordable for everyone? What contributions do naturalized citizens make to your community?]</p> <p>1.Naturalizing makes people less likely to need public benefits, but prohibiting applicants to use proof of public benefits to qualify for the fee waiver will make them less likely to be able to naturalize. Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages, than their non-naturalized foreign-born peers. Naturalization, on average, accounts for an 8-11% increase in wages, which results in higher spending and state and local taxes paid. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply.</p> <p>2.If our taxes are already paying state or local benefits-granting agencies to thoroughly verify household income for those applying for benefits, why does USCIS want to redo this work? USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed, especially when N-400 processing times are at a historic high.</p> <p>3.Nonprofit organizations like OneAmerica would have to retrain staff and volunteers, change and retranslate their educational and outreach materials, incurring costs for translation, design, printing and distribution. The additional time needed to find the necessary proof of income will stretch their staff capacity, resources and infrastructure.</p>
637	USCIS-2010-0008-0744	Sharon Farrell	<p>This is a terrible policy which must not be implemented. It creates extra burden on low-income families as they will no longer be allowed to provide a means-tested benefits letter to show that they are low-income and ultimately demonstrate that they qualify for a fee waiver. Many poor families don't have enough income and are legally not required o file tax returns, which will mean that they will not be able to prove their low-income status. As a result, they will not be eligible for the fee waivers thus preventing them from applying for US citizenship.</p>

ID	Comment.	Commentor	Comment
661	USCIS-2010-0008-0991	Liberty Harrington	I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.
697	USCIS-2010-0008-0995	Alyza DelPan- Monley	I object the proposed revision to the fee waiver process. There are disadvantaged elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.

ID	Comment.	Commentor	Comment
1142	USCIS-2010-0008-0544	Ellen Dumesnil on behalf of the International Institute of the Bay Area (IIBA)	<p>Comment part 2: The proposed changes place undue hardship on low-income immigrants and would act as a deterrent to their ability to participate fully in the US democratic system.</p> <p>The proposed changes make it more difficult for nonprofit immigration legal service providers to assist eligible individuals with the application process for citizenship. IIBA and many other immigration legal service providers utilize workshops to increase our capacity to serve large numbers of eligible LPRs applying for citizenship. At these workshops, LPRs are assisted by trained volunteers and legal staff in filling out their applications. This model is time tested and is a model for private public partnership.</p> <p>As part of the San Francisco Pathways to Citizenship Initiative, a private public partnership funded by public agencies and local foundations, IIBA and our partners have helped over 8,000 eligible LPRs complete their citizenship application since 2013.</p> <p>As part of the IIBA Napa Citizenship Legal Services Collaborative, IIBA and our partners have helped over 1,000 individual become citizens in the last five years. This collaborative effort was initially supported by Napa Valley Community Foundation funded by local residents of Napa who were committed to ensuring that the more than 9000 eligible LPRs in Napa had access to high quality, low-cost immigration legal services in order for them to be able to gain citizenship.</p> <p>Furthermore, in FY 17-18, through our Redwood City Collaborative Workshops, IIBA helped complete nearly 340 citizenship applications. Clearly, the naturalization workshop model efficiently and effectively aids thousands of eligible LPRs in becoming citizens. These public private partnerships bring together the community in support of immigrants. It is a demonstrable example of civic participation and this proposed change would have a dampening impact.</p> <p>The proposed changes to the fee waiver criteria will make these workshops less efficient and decrease the amount of individuals who can fill out their application with a fee waiver in a workshop setting. These additional requirements are onerous and seemingly designed to deny a subsection of those entitled to become citizens.</p> <p>The proposal to eliminate the receipt of means tested benefits as acceptable criteria for a fee waiver and now requiring each family member to submit their own form, and requiring all individuals to use the I-912 form to submit fee waiver requests is administratively burdensome. We question the goal and spirit of these proposed changes. USCIS has offered no evidence that the receipt of means tested benefits as criteria in identifying individuals unable to pay the naturalization fee or other immigration application fees has been an issue.</p> <p>These proposed changes will slow down the efficiency of service providers helping eligible individuals apply for immigration relief and naturalization. Furthermore, USCIS has offered no evidence that the original fee waiver criteria were lacking. On the face of it, the proposed changes seem punitive and designed to restrict access to citizenry.</p> <p>These changes place a larger burden on the individual to attain more documents to qualify for a fee waiver and ultimately puts more demands on the IRS as individuals will now need to reach out to that agency to obtain a federal tax transcript to prove household income at or below 150% of the federal poverty line instead</p>

ID	Comment.	Commentor	Comment
1297	USCIS-2010-0008-0971	Vaughn Cox, La Union del Pueblo Entero (LUPE)	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers. By only accepting fee waiver requests submitted using the Form 1-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form 1-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form 1-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the</p>

ID	Comment.	Commentor	Comment
422	USCIS-2010-0008-0550	Claire Fenton	<p>My name is Claire Fenton. I oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is too expensive for many people. I oppose the rule for this reason: The proposed revision is not necessary and will unfairly burden applicants, especially on the lowest income, elderly and disabled people who are not required to file tax returns. At our one-day workshops, it takes about 10 minutes to fill out a fee waiver application for someone receiving an approved means-tested benefit. Income-based fee waivers require more evidence and can take hours to prepare. They require the most recent years tax return and pay stubs from the last three months, or a combination of other income evidence, such as a tax transcript or proof of unemployment payments. Gathering this evidence could take someone weeks, and so and we would not be able to assist these applicants at our workshops. For many people - due to language, geography or cost - these one-day citizenship clinics are their only opportunity to access application assistance.</p>

ID	Comment.	Commentor	Comment
502	USCIS-2010-0008-0607	Andrew Hays, World Relief Seattle	<p>My name is Andrew Hays and I'm the Immigration Legal Services Manager at World Relief in Seattle. We are a non-profit organization that serves low-income immigrants and refugees with services like citizenship, green cards, work authorization, and travel documents. More than 2/3 of our clients qualify for fee waivers and the vast majority prove their eligibility by sharing proof of receipt of a means-tested benefit.</p> <p>The proposed changes to this regulation will make this process less fair, more cumbersome, and will ultimately lead to fewer people filing petitions for critical things like green cards and citizenship.</p> <p>Here are just a few of the reasons we consider this regulation to be ill-conceived:</p> <p>--Income is part of the story but not the whole story. \$15/hr is a completely different wage (proportionally) in San Francisco, CA than it is in Toledo, OH. The cost of living is cheaper in OH, which means wages are lower. By using states' means-tested benefits as the measuring stick for who should qualify for a fee waiver, you account for variations in cost of living (and therefore the relative buying power of a dollar). By instead basing this entirely on where an immigrant falls relative to the FPL, USCIS would effectively be demonstrating a preference for regions with a lower cost of living.</p> <p>--This will demand much more time from immigration legal service providers. For our immigration representatives, it takes 10-15 minutes to file an I-912 based on a means-tested benefit. To file based on income relative to the FPL takes closer to an hour to complete. In order for us to keep our doors open, we will have to charge a higher amount for this service. In essence, then, people will have to pay more money to save money in the end. Moreover, this additional time demand means that we will be able to serve less clients than we would under the current fee waiver arrangement.</p> <p>--Some clients whose incomes fall below a certain threshold don't file taxes. I was just meeting with such a client last week. He and his wife brought in less than \$10,000 in 2017 and so weren't required to file. Finding adequate paperwork to prove their need is very difficult. Once again, this is a way that this policy will complicate the process for the very people needing help the most.</p>
521	USCIS-2010-0008-0637	Nebula Li	<p>I strongly oppose the proposed change. I am a child of immigrants, and I am now an immigration attorney who serves low income immigrant survivors of domestic violence. This would make it more difficult for low income immigrants to show their incapacity to pay government fees, which can be thousands of dollars. Not everyone is required to pay taxes (especially if you make below the threshold dollar amount), and means-tested benefits are another reliable way to demonstrate inability to pay USCIS fees. Please keep this as an option for I-912's.</p>

ID	Comment.	Commentor	Comment
589	USCIS-2010-0008-0706	Anne Watanabe	I oppose the proposed change to the processing of Form I-912 for fee waivers (USCIS 2010-0008, OMB Control #1615-0116). The proposed change, by requiring tax returns to verify incomes, would create new barriers for low-income immigrants (e.g., elderly or student immigrants) who are not required to file tax returns. The current review process allows applicants to submit means-tested benefit letters issued by state governments; such letters are a reliable method of verifying the need for a fee waiver, and the issuance of these letters creates no extra burden for the state governments which are involved. Requiring tax returns to be filed by applicants who are not required to file them, creates an unnecessary and burdensome step for immigrant applicants, and also creates more paperwork for the federal government which must process tax returns that are not required by the federal tax code. The proposal does not serve either the applicant or the reviewing agencies, and it should not be enacted.

ID	Comment.	Commentor	Comment
595	USCIS-2010-0008-0757	Julie Arenivar	<p>My name is Julie Arenivar. I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at citizenship clinics (6 times since 2015). I help at these workshops because every person has the legal and human right to apply for citizenship when eligible. Do you have family or friends who are immigrants? Most of us have an immigrant story, we should be the land that welcomes immigrants and refugees not put up barriers and make them fear us as a nation. What the Trump administration has done is not only cruel but evil and inhumane. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits. I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons:</p> <p>For individuals who are not required to file taxes, because they do not work or earn enough to be required to, there is no clear way to establish eligibility for a fee waiver. The administration endorsing this change knows this very very well yet is doing it to systematically oppress people who are looking to becoming citizens. The piecemeal evidence that these individuals will provide will likely rejected as insufficient by USCIS. Some applicants may try to submit again, which requires additional time to prepare and review.</p> <p>The regulation says that someone should obtain their wage transcripts from the IRS as proof of income. However, in order to obtain a wage transcript online, you have to have a credit card, a vehicle loan or a mortgage for identification purposes. The vast majority of low-income applicants we serve do not have any of those, and would have to request their transcript by mail, which takes 5-10 business days. Low-income immigrants at our workshops are unlikely to come prepared with all the required income documentation, and they would have to get fee waiver assistance elsewhere.</p> <p>There is a large group of people who say that immigrants should come to the country "the right way". I ask you, what is the right way? What way allows anyone who would like to become a citizen a path of minimal barriers and help. Not this one. I am saddened by what our country has become, we owe it to future generations to lead with kindness and empathy not cruelty and legal barriers to keep others out.</p>
682	USCIS-2010-0008-0933	CJ Kennedy	<p>I am strongly opposed to the revised fee waiver policy. Eliminating the current verified method of proving income using the means-tested benefits letter and replacing it with the use of tax returns adds undue hardships as many low income individuals, seniors, and individuals receiving SSI are not required to file tax returns. This policy change will produce undue hardships for many and prevent them from becoming US citizens.</p>

ID	Comment.	Commentor	Comment
903	USCIS-2010-0008-0860	Deborah Carstens	<p>This regulation is a terrible idea! Many low-income immigrants are not required to file federal tax returns. By making this the only way to obtain a fee waiver, this regulation would impose an overwhelming and unnecessary burden. In addition, if an individual changes jobs and, at the time of fee application has a lower paying job entitling them to a waiver, requiring reliance on the previous year's income tax return will deprive that person of a waiver to which they are entitled. I strongly oppose this regulation.</p>
1094	USCIS-2010-0008-1214	Patrick Suhrbier	<p>** need to look at the attachment on regulations.gov. The comment did not copy well into DB** I wanted to express my deep concern regarding the proposed change to remove the means-tested benefit eligibility section on the E-912 Request for Fee Waiver. This change will have a significant negative impact on those who are most in need and eligible for the fee waiver, and put an unnecessary obstacle in the way of accessing this benefit for many. Working directly with individuals and families who are either homeless or are very low income, I have come to understand how essential the E-912 Fee Waiver is to individuals accessing immigration benefits and the positive impacts these benefits afford. The proposed changes would put in place an unnecessary obstacle for many families and individuals who are eligible for the fee waiver. This proposed change eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate their inability to pay the prescribed fee. Receipt of a meanstested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees. The rationale for the proposed changes states that taking away the public benefits option to qualify for the fee waiver will reduce the amount of evidence necessary to qualify for a fee waiver. This is completely inaccurate. The evidence necessary to qualify for a fee waiver is already established in the E-912 Request for Fee Waiver form. The proposed change would require individuals to provide additional evidence to qualify for a fee waiver, which is a burden on those who are most in need and eligible for the fee waiver. I strongly oppose this change.</p>

ID	Comment.	Commentor	Comment
1123	USCIS-2010-0008-0904	Kim Holland MD	I absolutely disagree with any measure that increases the cost or difficulty of applying for citizenship and places undue hardship on those least able to afford the cost of waiver. Do not implement any form of means testing that requires submitting tax forms or filing income tax returns or people who otherwise would not have to do so.
1192	USCIS-2010-0008-0770	Diane Narasaki (for ACRS)	<p>Comment part 3: Eliminating Receipt of Benefits as Proof of Fee Waiver Eligibility Is An Extraordinary and Indefensible Proposal</p> <p>Streamlining and modernizing the immigration services application process is a laudable goal, but this proposed change contravenes it. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCIS’s proposal would make that process more complicated, expensive, and paperwork-heavy – in direct derogation of the agency’s stated intention to simplify adjudications.</p> <p>Withdrawing the most simple and unambiguous method of demonstrating fee waiver eligibility departs from the historical precedent of progress toward greater efficiency in USCIS adjudication. Efficiency is enshrined in USCIS’s mission statement, and its pursuit is reflected in such initiatives as creation of an electronic filing system, and elimination of the previous requirement to file a separate biographical information form (G-325A) with applications for adjustment of status. The current proposal will increase time and dollar costs imposed upon every entity involved in administering fee waivers, including the USCIS, the Internal Revenue Service, other government agencies - and applicants themselves. As mentioned above, if this policy change is implemented, it is our assessment that ACRS will assist fewer clients to naturalize. Fewer clients will be able to prove their eligibility for the fee waiver, and it will be much more burdensome for us to assist those that previously qualified on the basis of their means-tested benefit letter. Our clients that previously qualified on the basis of their means-tested benefit letter (approximately 450 over a 22 month period) would now need to submit income taxes in order to document their eligibility. ACRS has a team of six staff in our naturalization department that are highly-skilled and efficient, but not authorized nor trained to assist our clients, many of whom are elderly and/or disabled, to file their income taxes. Our staff will have to work with these clients to identify high quality/free income tax preparation services in a timely manner. They will also have to work with these clients to overcome potentially significant cultural or linguistic barriers to doing so. As mentioned above, ACRS’ naturalization department worked with clients from 25 different countries last year. Some of our clients will decline to apply for naturalization because of cultural and linguistic barriers to filing taxes—which they are not legally required to do by the IRS. Some of our clients will file their taxes, but it will place a considerable burden on our staff to help mitigate their concerns with regard to filing their taxes.</p> <p>It is in the best interests of all Americans and consistent with our nation’s values to make naturalization as accessible as possible to eligible newcomers. The agency’s fee waiver application proposal is inconsistent with USCIS’s mission, and runs counter to the goals it has otherwise pursued.</p> <p>Conclusion</p> <p>ACRS appreciates your consideration of these comments, and stands ready to work with USCIS to further streamline application procedures while preserving robust access to naturalization and other services that increase the prosperity and well-being of communities across our country. To that end, we strongly urge you to maintain the current fee waiver application process and the guidelines set forth in Policy Memorandum PM-602-0011.1.</p> <p>Sincerely, Diane Narasaki</p>

ID	Comment.	Commentor	Comment
1172	USCIS-2010-0008-0805	Megan Martin, Center for the Study of Social Policy	<p>Comment part 2: This proposal will place a significant burden on people applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed rule would require applicants to submit the government-generated Form I-912 in order to receive a fee waiver. Currently, applicants are permitted to submit letters that they draft themselves when they apply for a fee waiver requests. Eliminating this currently accepted form of request places an unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated letter that provides all of the necessary information can equally meet the requirements. The proposed rule also requires each applicant—even individuals in a family who are applying together— to submit their own fee waiver application, imposing a huge burden on individuals. Currently, family members can submit a single fee waiver application, which is particularly helpful for families with young children applying for immigration benefits and for couples applying for naturalization at the same time.</p> <p>The proposal also eliminates an individual’s ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Currently, receipt of a means-tested benefit is sufficient evidence of inability to pay. This proof is by far the most common and straightforward way to prove fee waiver eligibility. People who have already proven an inability to make ends meet to one government agency should not have to prove that all over again to USCIS.</p> <p>Finally, under the proposed changes, the applicant must gather new documentation, including a federal tax transcript from the Internal Revenue Service (IRS), to demonstrate that their household income makes them eligible for a fee waiver. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. Federal tax returns are official documents that most people keep on hand. The same is not true of a federal tax transcript. The proposed requirement will place a heavy burden on anyone who has trouble accessing a computer, and will likely impose delays on the application process.</p> <p>Together, these proposed changes will likely discourage many people who are eligible for fee waivers and immigration benefits from applying. For those who it does not discourage, it will place significant burdens and strains on families who already have limited time and resources.</p> <p>USCIS should withdraw this proposal. Instead, it should work to make it easier for families to apply for fee waivers and immigration benefits, by expanding, rather than limiting, the types of documentary evidence accepted. Applying for immigration benefits should be an inclusive process that honors our country’s commitment to welcoming immigrants.</p> <p>If you have any questions, please do not hesitate to contact Megan Martin, (202) 371-1565; megan.martin@cssp.org.</p> <p>Sincerely, Megan Martin Vice President, Director of Public Policy Center for the Study of Social Policy</p>

ID	Comment.	Commentor	Comment
620	USCIS-2010-0008-0969	Philip Safar	<p>As an immigration lawyer, and rural community member I see individuals, particularly elderly people, people whose incomes are too low to file taxes, and people who are unemployed or underemployed will find it difficult to gather the documentation they need for the fee waiver. In many cultures, particularly the Hispanic families in our area, families pool resources to survive, and do not rely on public assistance necessarily, but may have limited documentation to prove their actual income and livelihood.</p> <p>USCIS case processing times are at a historic high currently it takes 16 months to process a citizenship application here in Seattle. Adding new and unnecessary paperwork hurdles will only make processing times longer.</p> <p>An income-based fee waiver takes at least 6 times as long to fill out than a benefits-based fee waiver. Organizations like OneAmerica will be able to help only a fraction of those who cant pay the full fee. This adds costs to individuals already struggling financially.</p> <p>If the benefits based income eligibility is eliminated, this will further discourage individuals from seeking those benefits they are legally entitled to.</p>

ID	Comment.	Commentor	Comment
1139	USCIS-2010-0008-0600	Claire Valentin, Children's Law Center of Massachusetts	<p>Comment part 2: First, Children’s Law center opposes the elimination of the means-tested benefit criterion. Many of our clients are permanently under the care of the state’s child welfare agency or have been placed under the custody of third parties. As a result, they do not readily have access to the financial information of their legal guardians. By virtue of their age and immigration status, they are not authorized to work themselves. Since they frequently have no independent income, they are unable to provide paystubs, W-2 forms, income tax return filings, and other evidence U.S.C.I.S. requires under the poverty-guideline threshold criterion. Clients who work typically earn less than the minimum threshold for filing a federal tax return and requiring these clients to file federal tax returns only to demonstrate their low-income is wasteful of federal resources that will be expended on processing unnecessary tax returns. By requiring our clients to provide evidence that they simply do not have, such as W-2 forms and income tax return filings, the proposed revision would create an unnecessary obstacle for our clients to receive immigration benefits that they desperately require to stabilize their precarious situations.</p> <p>In particular, the proposed rule would impact special immigrant juveniles who are applying for authorization for employment and/or adjustment of status and youths who have been granted asylum who are applying for renewed work authorization and/or adjustment of status. While the I-360 petition for special immigrant juvenile classification and the I-589 application for asylum do not require a fee, the collateral application for a work permit currently costs \$495 and the collateral application for adjustment of status costs \$1,225. An application for naturalization currently costs \$725. These are very substantial fees that are outside the means of dependent youth, who do not have an independent source of income as a result of their age, immigration status, and dependency on legal guardians.</p> <p>The current fee waiver form, which allows an individual to be granted a fee waiver based on receipt of a means-tested benefit, is a much simpler and more efficient test for our clients because all of our clients qualify for Medicaid insurance. All Massachusetts residents are required by state law to have medical insurance, therefore our clients are required to enroll in</p>

ID	Comment.	Commentor	Comment
1270	USCIS-2010-0008-1059	Elizabeth Martin	<p>Comment part 2: B. This proposal will place an unreasonable time and resource burden on individuals applying for fee waivers.</p> <p>First, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is in one location. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This not only burdens the families; it puts a significant burden on other Government Agencies, such as the IRS, increasing its already heavy work load and adding to the government expense for the IRS to provide the information and verification as well as, the additional time for those helping immigrants through the complex and confusing immigration system.</p> <p>Second, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the fee. Receipt of a means-tested benefit is the most comprehensive evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. Government agencies spend significant time reviewing and verifying income and assets of those seeking assistance. USCIS can use the receipt of means tested benefits with confidence that the applicant qualifies for a fee waiver.</p> <p>Third, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government provides no reason why a transcript is better than a federal tax return.</p> <p>Though USCIS believes the additional burdens would amount to an additional 1.7 hours the estimate does not take into consideration the time spent by IRS staff to provide the unnecessary documents, the cost of paper and postage; It fails to consider the time spent by those who assist immigrants in obtaining these unnecessary documents.</p>

ID	Comment.	Commentor	Comment
1424	USCIS-2010-0008-1186	Leah Martin, Hand in Hand	<p>Comment part 2: This proposal would reduce efficiency. Instead of requiring less evidence from applicants, as its Federal Register announcement suggests, USCIS would force these individuals to collect, and adjudicators to analyze, many more records. It's easy to determine whether an applicant receives a means-tested benefit by simply reviewing government documentation. However, assessing an individual's income or financial hardship is a more open-ended inquiry. A single document often cannot answer it, especially for people who aren't required to file taxes, or people whose income or family status has changed since they filed taxes. This proposal would therefore not simplify the evidence required for fee waiver adjudication, but instead multiply it exponentially.</p> <p>Receipt of a means-tested benefit is a straightforward, efficient standard because it makes use of the income verification process that local and state benefits agencies have already conducted, instead of requiring federal adjudicators to repeat it. Preventing USCIS employees from relying on their state and local counterparts' competent work is a waste of resources.</p>

ID	Comment.	Commentor	Comment
726	USCIS-2010-0008-0959	Michaela Moshier	<p>I am a DOJ Accredited Representative at HarborCOV, a nonprofit organization based in Chelsea, Massachusetts. HarborCOV specializes in providing immigration legal services, as well as other emergency and long-term support services, to survivors of domestic violence and their families. I am writing to express my concerns about the impact of the proposed changes related to Form I-912, Request for Fee Waiver.</p> <p>The majority of the survivors of abuse served by HarborCOV are low-income and qualify for fee waivers. Though the families that we work with are often employed and self-sufficient, their income is low enough such that they do not have disposable income available to pay the expensive filing fees associated with their immigration cases. This reality is often a direct result of the patterns of financial abuse and control experienced by most survivors of domestic violence. The proposed changes would make it much more difficult for these survivors to access fee waivers, creating yet another obstacle for immigrant survivors seeking immigration relief.</p> <p>The proposed changes would remove receipt of a means-tested benefit as a category of eligibility for a fee waiver, requiring applicants to prove either low income or financial hardship. In our experience, proving eligibility for a fee waiver based on income is extremely difficult for our clients and is onerous and time-consuming for our nonprofit agency. Many immigrant survivors do not have access to primary forms of evidence of income and assets. Many have not filed tax returns because their income was too low or they were not permitted to do so by abusive and controlling partners. Yet others do not have pay stubs because their income is so low or inconsistent based on the temporary nature of their work. In our offices recent experience, even when we do submit ample evidence of income, such as one month of recent paystubs, our requests for fee waivers are still denied. Fee waiver requests require ample time to prepare and in many recent cases, we have had to resubmit requests two or more times before the fee waiver request is granted, despite the familys indigent status or demonstrated financial hardship. This represents a misuse of the time and resources of USCIS and causes hardship and inefficiency for our office, a nonprofit organization with limited resources.</p> <p>I strongly urge USCIS to withdraw the proposed revisions and to, instead, expand the types of documentary evidence accepted for establishing eligibility for a fee waiver so that survivors of domestic violence, sexual assault and human trafficking may equally access these protections. Strong, safe families lead to stronger, safer communities. Further restricting access to these protections puts both at risk.</p>

ID	Comment.	Commentor	Comment
1210	USCIS-2010-0008-0897	Grace Huang, Asian Pacific Institute on Gender- Based Violence	<p>Comment part 2: I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require applicants for immigration benefits to use Form I-912 to request a fee waiver, as well as each individual in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that an applicant can provide in order to establish eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, including immigrant survivors of domestic violence and sexual assault, as well as other vulnerable individuals, to apply for immigration benefits for which they are eligible.</p> <p>The filing fees associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. In particular, the increased complexity of seeking a fee waiver will create additional barriers for survivors in accessing immigration benefits, which can have a significant impact on their ability to overcome the trauma they've experienced. While some of the immigration benefits associated with survivors of domestic violence, sexual assault and human trafficking do not have filing fees associated with the relevant immigration applications, there are significant numbers of survivors who fall into other</p>

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846	USCIS-2010-0008-0929	Wendy Wylegala, Kids in Need of Defense (KIND)	<p>Comment part 1: Re: Docket ID USCIS-2010-0008, OMB Control Number 1615-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>Kids in Need of Defense (KIND) appreciates the opportunity to comment on revisions proposed by U.S. Citizenship and Immigration Services (USCIS) relating to Form I-912, Request for Fee Waiver, and related guidance. Notice inviting comment on these proposed revisions (hereinafter, the “Proposed Revisions”) was published September 28, 2018 in the Federal Register.¹ If USCIS adopts the Proposed Revisions, it would modify Form I-912 (the “Proposed Form”), revise the accompanying instructions (the “Proposed Instructions”), and rescind and replace its Policy Memorandum entitled “Fee Waiver Guidelines as Established by the Final Rule of the USCIS Fee Schedule; Revisions to Adjudicator Field Manual (AFM) Chapter 10.9, AFM Update AD11-26”² (hereinafter, the “2011 Policy Memo”). We call on USCIS to withdraw the Proposed Revisions, which would present barriers to immigrant and refugee children and other survivors of harm who seek to regularize their status and remain safely in the United States. USCIS should instead expand the flexibility of its fee waiver policies.</p> <p>KIND is a national nonprofit organization dedicated to providing free legal representation and protection to unaccompanied immigrant and refugee children in removal proceedings. Since January 2009, KIND has received referrals for over 17,300 children from 70 countries, and has collaborated with more than 570 pro bono partners to serve such children. KIND promotes protection of children in countries of origin and transit countries and works to address the root causes of child migration from Central America. KIND also advocates for laws, policies, and practices to improve the protection of unaccompanied children in the United States, by educating policymakers, the media, and the broader public about the violence that is driving children out of Central America and their need for protection. KIND has field offices in ten locations: Atlanta, Baltimore, Boston, Houston, Los Angeles, Newark, New York, San Francisco/Fresno, Seattle, and Northern Virginia/Washington, DC.</p> <p>Many children served by KIND have fled their countries of origin because of violence or other threats to their safety, and can demonstrate eligibility for humanitarian relief or other avenues to lawful immigration status. For example, many child victims of persecution and other violence are granted asylum, withholding of removal, or protection under the Convention Against Torture. Other children are eligible for Special Immigrant Juvenile Status (SIJS) on the basis of parental abuse, neglect, abandonment or similar circumstances. Children who are victims of crimes or human trafficking may be found eligible for U or T nonimmigrant status, and abused children of U.S. citizens or legal permanent residents may self-petition under the Violence Against Women Act (VAWA). On the basis of such relief, many children will become eligible for lawful permanent residency, or will become entitled to remain and work lawfully in the United States for an extended period.</p> <p>Appropriately, the petitions or applications for the types of humanitarian relief described above do not entail filing fees. However, filing fees frequently present a barrier to children who seek to file a motion or appeal to contest the denial of a benefit (Form I-290B), apply for adjustment of status (Form I-485), seek a waiver of grounds of inadmissibility (Form I-601), apply for employment authorization (Form I-765), or file other forms necessary to the resolution of their immigration matters.</p>

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1001	USCIS-2010-0008-1096	Christina Gill on behalf of Greater Hartford Legal Aid, Inc.	<p>Comment part 1: Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Service Department of Homeland Security 20 Massachusetts Ave., NW Washington, DC 20529-2140 Submitted via www.regulations.gov RE: USCIS-2010-0008, OMB Control Number 1615-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of Greater Hartford Legal Aid, Inc. (GHLA) I am submitting this response to “U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions” published in the Federal Register on September 28, 2018 (hereinafter “proposed revisions”).¹ These proposed revisions relate to Form I-912; Request for Fee Waiver and accompanying memoranda.²</p> <p>GHLA is a not-for-profit law firm that provides free legal services to low income residents in the Hartford, Connecticut area, including immigrant survivors of domestic and sexual violence, those affected by human trafficking, and children who have suffered abuse, abandonment or neglect. Our work includes direct representation of survivors who rely on fee waivers in order to access survivor-based protections such as VAWA I-751 petitions; I-192 waivers submitted in connection with U and T visa applications; and Adjustment of Status applications based on approved VAWA self-petitions, Special Immigrant Juvenile Status petitions, and U and T visa applications. Fee waivers are critical to ensuring survivors can access relief; therefore, we strongly oppose the proposed revisions to the I-912 fee waiver application and instructions as well any corresponding changes to the USCIS Policy Memorandum, PM-602-0011.^{1.3} We call on USCIS to withdraw the proposed revisions to the fee waiver form and USCIS memoranda, which will create additional and unnecessary burdens on immigrant communities, federal agencies, and service providers. Instead, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure that immigrant survivors of violence have equal access to critical, life-saving protections.</p> <p>The proposed revisions directly conflict with the clear will of Congress that survivors not be precluded from seeking status due to inability to pay fees.⁴ Moreover, the abrupt change in fee waiver policy violates the special “any credible evidence” standard Congress mandated, in express recognition that survivors of domestic and sexual violence, in particular, often do not control “primary” forms of evidence.⁵ Furthermore, the proposed revisions will create significant additional burdens for</p>

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1209	USCIS-2010-0008-0897	Grace Huang, Asian Pacific Institute on Gender- Based Violence	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>Below please find comments submitted in response to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018, on behalf of the Asian Pacific Institute on Gender-Based Violence (API-GBV). The API-GBV is a national resource center on domestic violence, sexual violence, trafficking, and other forms of genderbased violence in Asian and Pacific Islander and immigrant communities. The API-GBV serves a national network of advocates; community-based service programs; federal agencies; national and state organizations; legal, health, and mental health professionals; researchers; policy advocates; and activists from social justice organizations. It analyzes critical issues, promotes culturally relevant evidence-informed intervention and prevention, provides consultation, technical assistance and training; develops resources, conducts and disseminates research, and impacts systems change through administrative advocacy and policy analysis.</p> <p>Based on our experience supporting victim services providers and in working directly with immigrant survivors, we write in opposition to the proposed changes to the fee waiver process. The proposed changes create additional barriers for immigrant survivors and their families, and would cause a significant additional burden on communities, federal agencies, and victim advocates. If USCIS seeks to proceed in making changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a</p> <p>2</p> <p>for survivors in order to ensure the fair and efficient adjudication of these</p>

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1248	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 2: Evidentiary Requirements for Victims - Explicit Recognition of Special Evidentiary Requirements for Victims</p> <p>Through the Trafficking Victims Protection Reauthorization Act (TVPRA) of 2008, Congress codified their intent to provide survivors of human trafficking, domestic violence, and other crimes access to humanitarian relief without threat or fear of retaliation or removal by ensuring survivors the ability to apply for a fee waiver for any fees associated with the filing of a VAWA self-petition, VAWA cancellation/or suspension, U visa, or T visa.² Congress also intended to ensure the equal and expedited access to survivor-based protections by removing additional financial and evidentiary barriers for survivors of human trafficking, domestic violence, and other crimes.³ In addition to the TVPRA Of 2008, Congress recognized the evidentiary challenges survivors faced with lack of “primary” evidence due to their victimization, and, thus, created the “any credible” evidence standard for survivor-based humanitarian forms of relief including VAWA self-petitions, U Visa, and T Visa applications.⁴ Traffickers often target their victims because they are financially vulnerable and use forms of economic abuse to control their victims and force them to remain in the trafficking situations. As a result, many of the survivors of human trafficking do not have the resources to pay for fee-based ancillary forms as a direct result of that economic abuse and trafficking victimization suffered. Traffickers often confiscate important documents including bank accounts, pay stubs, tax transcripts as another form of control leaving many survivors without documentation to prove their annual income or economic need for the fee waiver request. The 2011 fee waiver guidance promulgated guidance took into considerations these barriers that trafficking survivors faced and carried out the congressional intent to promote access to humanitarian relief without threat of retaliation or removal for survivors as well as accommodating the “any credible evidence standard”.⁵ The 2011 fee waiver guidance provides clear instructions on who qualifies for a fee waiver and provides explicit guidance that no additional evidence was required for the fee waiver request as long as the inability to pay the fee was sufficiently detailed in the application itself.⁶ Consequently, CAST strongly recommends USCIS to continue to provide clear guidance to recognize and to uphold this congressional intent. CAST strongly disagrees with USCIS’s proposal to rescind Policy Memorandum, PM-602-0011.1, Fee Waiver Guidelines as Established by the Final Rule of the USCIS Fee Schedule; Revisions to Adjudicator's Field Manual (AFM) Chapter 10.9, AFM Update AD11-26 (Mar. 13, 2011) and issue new guidance on the documentation acceptable for individuals to present to demonstrate that they are unable to pay a fee when requesting a fee waiver.</p> <p>CAST commends USCIS for proposing the specific identification of whether the underlying application for the fee waiver is a form of humanitarian relief in the proposed Form I-912. However, CAST implores USCIS to further implement the congressional intent to remove financial and evidentiary barriers for survivors through the fee waiver process by explicitly instructing survivors that additional primary evidence of income or economic hardship is not required for the fee waiver application. Imposing a higher burden of evidentiary proof in the fee waiver request than what would be required of survivors of their underlying humanitarian relief they are seeking would be in direct opposition of the protections Congress has established for survivors. CAST has seen a recent increase in Request for Additional Evidence (RFE) for Fee Waiver Request, Form I-912, that have increased the burden on trafficking survivors to produce additional evidence that many trafficking survivors do not have access to this “any credible standard”. The additional evidence sought has also created higher fees with for survivors of trafficking that are unable to pay.</p>
156	USCIS-2010-0008-0293	Don Bisdorf	<p>As an American voter, I oppose the proposal to change the eligibility for fee waivers.</p> <p>Our immigration process is already unnecessarily cumbersome. If the administration seeks to end illegal immigration, we must do our best to assist those who seek legal paths to immigration. Introducing this change will merely provide roadblocks to legal immigration and will add to our population of undocumented immigrants.</p>

ID	Comment.	Commentor	Comment
184	USCIS-2010-0008-0333	Christina Guros	<p>I completely oppose the proposed rule change put forth by the Department of Homeland Security to make it harder to request a fee waiver because it is punitive and serves to block families from accessing the economic benefits of gaining and maintaining lawful status.</p> <p>Means-tested public benefits are a safety net for working families who fall on hard times. The entire idea of this safety net assistance is to maintain stability until the family is able to regain or increase employment earnings and become self-sufficient. Requiring additional proof of financial need will mean the inability to file for necessary immigration benefits. This can lead to further destabilization. Being unable to afford the filing fee means a person will lose or not gain legal status, or lose their proof of legal status which is needed to be eligible for employment, educational scholarships, and continued access to public assistance.</p> <p>For example, a person whose green card is expiring and who is unable to provide proof of their financial standing aside from their eligibility for public benefits, will be unable to renew their green card and will then have no proof of status to use for future employment.</p> <p>Not having current identification or proof of lawful status also puts individuals and families at risk for detrimental contact with the police who fine people who dont have identification, or with Immigration and Customs Enforcement (ICE) who will misinterpret the lack of proof of status as a lack of status. These are terrifying possibilities for immigrants who have lawfully obtained status and remain in status, but with this unnecessarily punitive policy change, would be unable to prove it. Losing proof of status also affects a persons ability to prove eligibility for public assistance, and therefore the ability to stabilize their situation in the short-term and improve it in the long-term.</p> <p>This entire rule change appears to be setup to destabilize families who are experiencing financial hardship, and the consequences could be as dire as arrest, detention and deportation. This is a completely unnecessary change that hugely damages families and wastes resources at ever part of the immigration system. For these reasons I strongly oppose the DHS proposal to change the I-912 Fee Waiver process.</p>

ID	Comment.	Commentor	Comment
221	USCIS-2010-0008-0358	Sungeun Kim	I firmly oppose the proposed policy change. This rule hurts middle to low-income residents, along with the elderly and the young working class. The application process itself is very daunting. The administration should not strong arm the people that they are trying to uplift by taking away fee waivers. Many people rely on these fee waivers to submit their process. There is no reason for the agency to require even more extensive documents for fee waiver - this is an attempt to limit the amount of qualified applicants from being considered for naturalization. Do not suppress the already marginalized people's voices and choices in wanting to become naturalized.
223	USCIS-2010-0008-0363	Jacob Miller	The USCIS should not do makes changes to make the fee waiver process more difficult. Earned citizenship is such an important part of our history and culture and punishing less fortunate immigrants makes no sense. I am opposed to any such changes.
362	USCIS-2010-0008-0502	Eskinder Kassaye	waivers are important tools to help people from low income communities naturalize and engage in civic duties. It is not American to inhibit people from becoming a citizen because they are not able to afford to pay a processing fee. It must be taken as basic human right services and denial of someone's right to be part of this great country. As an immigrant, this is personal to me and the body who is sponsoring this must reconsider this. It is a blatant denial of someone's commitment for the country they consider home.

ID	Comment.	Commentor	Comment
572	USCIS-2010-0008-0695	Laura Preftes	<p>I am the granddaughter of immigrants who came to this country in order to have a better life for themselves and their future generations of children and grandchildren. And they succeeded. All of us women have gone on to earn our master's degree. Another is attending medical school. All of us are contributing to our society. The greatest day in my grandparents lives were when they became citizens. They loved our country and were proud to be citizens. They came here without money and worked hard, never making much, but providing enough for their children and, more importantly, giving their children values of hard work and pride in their country.</p> <p>If my grandparents came today, without this waiver, they may never have gotten citizenship the so desired. I have volunteered at citizenship events and met many immigrants. They are like my grandparents in so many ways. They desire a good life and are proud to be living in this great country. They are truly appreciative of what the US has given them.</p> <p>This new proposal will result in an undue burden for so many of these good, kind and hardworking people. Please keep the waiver program as it is currently administered. Allow these people a fair chance to become the citizens that our country needs to fulfil our promise of greatness.</p>

ID	Comment.	Commentor	Comment
753	USCIS-2010-0008-0863	Adriana Zazula	<p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>I currently work at our organization where most immigrant families live at or below the national poverty level. These families are not only struggling to support their families but also rely on us to support them through the daunting immigration process. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible. The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors are women and economic abuse which</p>

ID	Comment.	Commentor	Comment
875	USCIS-2010-0008-0741	Roxana Norouzi, OneAmerica	<p>My name is Roxana Norouzi. I am a US citizen who is the daughter of immigrants from Iran. Many in my famliy have applied for citizenship over the last 40 years in which we have lived in the US. Many of my family members in particular my grandmother and other elders in my family have only been able to become natuarlized citizens.</p> <p>It's because of my own personal experiences, that I am writing today to urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I am not only the daughter of immigrants but I've also committed my career to supporting immigrants and work with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at citizenship clinics three times this year. I help at these workshops because I've seen the importance of citizenship and what it has done for my own family in terms of integrating into our society, being civically engaged and having more safety and security. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons:</p> <p>Naturalizing makes people less likely to need public benefits, but prohibiting applicants to use proof of public benefits to qualify for the fee waiver will make them less likely to be able to naturalize. Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages, than their non-naturalized foreign-born peers. Naturalization, on average, accounts for an 8-11% increase in wages, which results in higher spending and state and local taxes paid. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply.</p> <p>Additionally, nonprofit organizations like OneAmerica would have to retrain staff and volunteers, change and retranslate their educational and outreach materials, incurring costs for translation, design, printing and distribution. The additional time needed to find the necessary proof of income will stretch their staff capacity, resources and infrastructure.</p> <p>I know personally and from my work that the inability to naturalize makes family unification less likely and weakens families.</p>
906	USCIS-2010-0008-0899	Sydney M	<p>I oppose this revision to fee waivers as it is unethical. It creates another challenge for immigrants who already struggle with finances to receive help. Immigrants come to this country to puruse A better life, and it is an American ideal to be the land of opportunity. A fee waiver is meant to assist those who need it and this revision is counter-productive to providing that assistance. It is inconsiderate of the already numerous struggles immigrants must face to live in America and only enforces barriers rather than opportunity.</p>

ID	Comment.	Commentor	Comment
997	USCIS-2010-0008-1092	John Zeitler	I have been volunteering with refugees for many years, teaching ESL, citizenship,etc. They are wonderful people whom we should welcome to our country with open arms. It pains my heart to see our government make it more difficult for refugees to enter the country and to attain citizenship.
1016	USCIS-2010-0008-1120	Marijke Fakasiieiki, Refugee Connections Spokane	I am writing, as the Executive Director of Refugee Connections Spokane, an organization with a mission to identify systemic issues which create barriers to the successful resettlement and the long term well-being of refugees and immigrants in the Spokane, Washington, area, in opposition to the Department of Homeland Security, United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. This policy will harm millions by creating additional burdens to immigrants and their families applying for legal status. As an agency serving refugees and immigrants, we expect thousands of people in our region would be affected, including women, men, children and elders who are seeking to create a better life for themselves. The impact would be long-lasting and multi-generational. America should maintain a just and fair immigration policy, but should not victimize immigrants further.
1019	USCIS-2010-0008-1125	Axl Dark	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1061	USCIS-2010-0008-1181	Alx Dark	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment

ID	Comment.	Commentor	Comment
1068	USCIS-2010-0008-1188	Eloise Cranke	<p>I am writing to express my strong opposition to the proposed changes to the fee waiver policy. If approved, it would place a much greater burden on applicants, especially the elderly and other vulnerable persons like survivors of sexual assault, domestic violence and other crimes. It would make the process more difficult, both for the applicants and the government agencies that handle the process. The proposed changes would deny access to relief for deserving immigrants who contribute so much to our communities and our economy. Once again those who are wealthy would be favored while working class people, low-wage workers and other vulnerable populations would suffer. Please oppose these proposed changes to the fee waiver policy.</p>

ID	Comment.	Commentor	Comment
1112	USCIS-2010-0008-1232	Sanaa Abrar, United We Dream	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Ms. Deshommes:</p> <p>I am writing on behalf of United We Dream in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>United We Dream is the largest immigrant youth-led network in the country and it is part of our core mission to create welcoming spaces for people regardless of origin, color of skin, income or sexual orientation, immigration status, religion or as in this case income. As organizers who are primarily led by undocumented or formerly undocumented leaders, we know for a fact that the proposed changes to fee waiver eligibility criteria will negatively impact not only the individuals attempting to adjust their status, but most importantly the families and the communities where they live by forcing them out of both the much needed relief and the opportunities they would otherwise have.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for our immigrant communities, vulnerable individuals and would cause a significant additional burden on federal agencies and service providers.</p> <p>This proposal will place a significant burden on people seeking for immigration.</p>
1119	USCIS-2010-0008-1239	Elizabeth Strongman	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment

ID	Comment.	Commentor	Comment
1291	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 9: The proposed rule change will reduce the number of low-income individuals applying for naturalization, and thereby decrease the positive effects of naturalization.</p> <p>When a fee waiver request is denied, some clients pay the filing fee. Others are deterred from applying altogether. These individuals are delayed, if not permanently discouraged, from applying for U.S. citizenship. Naturalization applicants already face long wait times due to USCIS processing delays, and an inability to afford the N-400 filing fee further delays the opportunity to fully participate in voting and other civic duties'. By making it harder to obtain a fee waiver, USCIS creates an unnecessary obstacle to an immigrant's full participation in American society. Our government should be doing exactly the opposite of this: encouraging naturalization and making the process as accessible and efficient as possible.</p> <p>Multiple studies show the economic gains associated with naturalization; becoming a U.S. citizen increases individual earnings eight to 11 percent³, which in turn improves family outcomes and the overall economy. By creating obstacles for families for receiving safety net assistance, USCIS is decreasing their opportunities for future economic wellbeing. A recent analysis performed by OneAmerica, a Washington State-based nonprofit, showed that would-be naturalization applicants lose out on significant income gains if fee waiver-eligible applicants decide not to apply for naturalization. If even 94 individuals (five percent of the population analyzed by OneAmerica) could not obtain a fee waiver, and therefore declined to apply for and obtain U.S. citizenship, their households would lose out on a combined \$300,000 (\$3,296 per person) in income for each year they failed to become U.S. citizens. This lost household income results in a decrease of more than \$1 million in future spending and revenue.</p> <p>In sum, the proposed rule creates massive inefficiency without any clear gain.</p> <p>The City of Seattle strongly opposes the proposed rule to modify the Form 1-912, Request for Fee Waiver.</p> <p>The City of Seattle opposes the proposed changes to the Form 1-912 because it would cause additional obstacles for individuals applying and otherwise eligible for immigration benefits. The rule changes will</p>
452	USCIS-2010-0008-0565	Ian Donohue	<p>The very idea of suddenly changes the rules of paperwork will slow down the process, require more money for training those who do the evaluations, and require already low income families to spend money that could be better used on education, nutrition, and house.</p> <p>By changing the fee waiver eligibility , it causes some families to not apply at all because they cannot afford the application</p>

ID	Comment.	Commentor	Comment
462	USCIS-2010-0008-0614	Janice Driesbach	<p>I write as a private citizen in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for vulnerable immigrants, promising to negatively impact American communities. If USCIS makes any changes to the fee waiver form, I urge the agency to expand the types of documentary evidence accepted to establish eligibility for a fee waiver to ensure the fair and efficient adjudication of these applications. Filing fees for immigration benefits can be an insurmountable obstacles and any changes to these costs should be designed to ease, rather than exacerbate, these obstacles.</p> <p>Increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for forms to be completed. And requiring additional documents will potentially serve as a deterrent to applying for immigration benefits or naturalization. In addition, making the forms more complex may lead to errors and worthy individuals may be unable to complete applications if they lack requisite documentation.</p> <p>Throughout history, as a nation of immigrants, the United States has benefited from the influx of immigrants from many cultures, a situation that is particularly true as our population ages. Talented and hardworking immigrants quickly contribute to our American economy and interfering with these efforts harms us all. Please do not proceed with making changes that will make a cumbersome process even more difficult.</p>
495	USCIS-2010-0008-0627	William Horn	<p>I object to the proposed revision to the fee waiver process. Many people with the lowest incomes use other currently accepted methods to verify their incomes in order to apply for the fee waiver. The proposed change would make it impossible for many of them to prove they are eligible for the fee waiver.</p>

ID	Comment.	Commentor	Comment
520	USCIS-2010-0008-0660	Manolo Stephens	<p>Changing the waiver eligibility will result in low income immigrants unable to prove that they are eligible, especially if they do not earn enough money to file income taxes.</p> <p>This will mean that even if they are qualified to file for citizenship, the proposed changes will result in creating a barrier that they most likely will be unable to overcome.</p> <p>This is a terrible idea and totally unacceptable.</p>
1073	USCIS-2010-0008-1193	Joshua Hoyt, National Partnership for New Americans	<p>Comment part 1: November 27, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>The National Partnership for New Americans (NPNA) and our member organizations, signed below, strongly oppose the rule removing eligibility for a fee waiver based on an applicant’s receipt of a meanstested benefit, proposed by U.S Department of Homeland Security (DHS) and U.S. Citizenship and Immigration Services (USCIS), OMB Control Number 1615-0016, Docket ID USCIS-2010-008, and published in the Federal Register on September 28, 2018.</p> <p>NPNA estimates that this policy change will effectively cut off access to United States citizenship for over 244,000 immigrants a year who are eligible for citizenship, among other applications, and disproportionately impact elderly and working poor immigrants. U.S. citizenship should not be privilege limited to wealthy immigrants. This proposed rule, combined with the exploding naturalization application backlog and lengthening processing times, make it appear that USCIS is building a “second wall” to prevent eligible immigrants from becoming citizens and voters. We urge DHS and USCIS to withdraw the proposed rule, and, instead, dedicate additional resources to encouraging eligible lawful permanent residents (LPRs) to apply for citizenship.</p> <p>NPNA is a national multiethnic, multiracial partnership. We represent the collective power and resources of the country’s 37 largest regional immigrant and refugee rights organizations in 31 states. Our members provide large-scale services—from Deferred Action for Childhood Arrivals application processing to voter registration to health care enrollment—for their communities, and they combine service delivery with sophisticated organizing tactics to advance local and state policy. We exist to leverage their</p>

ID	Comment.	Commentor	Comment
1097	USCIS-2010-0008-1217	Anonymous	<p>I am a DOJ Representative who is highly disturbed by this new regulation. My argument is simple: these new regulations are onerous and unjust. I am asking not for the future people who will be seeking to apply for naturalization, green cards, adjustment of status, work authorizations and the many other immigration processes an applicant can be granted a fee waiver. I am asking for the American citizens that will be highly affected by these changes.</p> <p>The changes to the request of a fee waiver will not only increase the costs families will incur when applying for an immigration benefit, but also will cause a physical and emotional toll. Applying for any type of immigration benefit is a process that not only affects the Non-US born citizen/resident but the family members who are born inside the United States. And this includes not only financial stress but also the mental worry that can lead to worsen health and family relations. This weight not only lives with the immigrant of color but the white/Caucasian Americans and European born Immigrants who entered legally, who have done everything under the law, but chose to marry someone who was born in another country or who has family abroad but legally can petition for a work permit, or are here and can apply for an adjustment of status, or they have to renew their green card. American born citizens will be affected by this badly executed regulation change.</p> <p>We know applying for an immigration benefit, is a long and arduous process, no matter who you are and where you come from. American born citizens are the ones filling out the forms, hiring legal help when needed, and are the ones that will be compelled to raise the funds for the fees USCIS imposes on citizenship, family petitions, work permits and the other 27 immigration benefits eligible for the I-912 request for Fee Waiver. And why? Because these same American citizens have family they love that was not as lucky to be born here and want them in the US with them.</p> <p>Every applicant no matter their race needs to prove their good moral character, their love for this country, and their desire to build a life that will benefit the community at large, no matter the immigration benefit. And those same people are married or related to US citizens. The same US citizens who will have to save more money to enjoy the American dream: own a house with their family, send their kids to college, and have a good life to support them. That cannot be done due to economic</p>

ID	Comment.	Commentor	Comment
501	USCIS-2010-0008-0666	Clare Crawford	<p>The proposed rule will be harmful to the low-income and vulnerable immigrant populations. As it stands, many of the immigration fees are prohibitive high and burdensome for many immigrants. They simply cannot save enough money to afford them. This proposed rule would discourage low-income immigrants from applying for benefits that they are eligible for because they could not pay the fee or could not provide the necessary financial documents to prove their financial hardships. Receipt of government benefits would have been an easy way for people to qualify for a fee waiver. Each state has its own rule for who qualify for benefits depending on the cost of living in their area. Eliminating this rule would place additional burden on the adjudicators of these immigration applications as well as placing additional barriers for people to apply.</p>

ID	Comment.	Commentor	Comment
613	USCIS-2010-0008-0750	Nimco Bulale, OneAmerica	<p>My name is Nimco Bulale. I urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at citizenship clinics 5 times since 2015. I help at these workshops because I have family and friends who are immigrants, who have made amazing contributions to this country. Moreover, my family came to this country over 20 years ago seeking asylum from the civil war in Somalia. However, not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons:</p> <p>Naturalizing makes people less likely to need public benefits, but prohibiting applicants to use proof of public benefits to qualify for the fee waiver will make them less likely to be able to naturalize. Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages, than their non-naturalized foreign-born peers. Naturalization, on average, accounts for an 8-11% increase in wages, which results in higher spending and state and local taxes paid. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply.</p> <p>Nonprofit organizations like OneAmerica would have to retrain staff and volunteers, change and retranslate their educational and outreach materials, incurring costs for translation, design, printing and distribution. The additional time needed to find the necessary proof of income will stretch their staff capacity, resources and infrastructure.</p> <p>Inability to naturalize makes family unification less likely and weakens families.</p> <p>American values should include equal access to immigration and citizenship benefits regardless of wealth. This rule violates that value.</p> <p>Thank you.</p>

ID	Comment.	Commentor	Comment
709	USCIS-2010-0008-0942	Rosanna Eugenio, The City of New York ("the City")	<p>** Additional attachments located on regulations.gov** November 27, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 Submitted via Federal eRulemaking Portal Re: Request for Comments: Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions OMB Control No. 1615-0116; e-Docket ID No. USCIS-2010-0008 Dear Chief Deshommes:</p> <p>The City of New York ("the City") appreciates the opportunity to comment on the proposed revision of the currently approved collection of Request for Fee Waiver; Exemptions, published in the Federal Register on September 28, 2018. The New York City Mayor's Office of Immigrant Affairs ("MOIA") and Human Resources Administration/Department of Social Services ("HRA/DSS") present this comment as the lead offices coordinating immigration legal services and administering means-tested benefits programs for immigrant New Yorkers. On behalf of the City, we oppose the proposed revision.</p> <p>Civic participation by all New Yorkers, including immigrant New Yorkers, is a fundamental priority under Mayor de Blasio's Administration. The proposed changes would burden lawful permanent residents seeking naturalization, seeking to replace their documents, or applying for other immigration benefits. The proposed changes would disproportionately harm vulnerable immigrants such as seniors and persons with disabilities. The proposed changes would also result in significant additional burden on community-based agencies and service providers including</p>

ID	Comment.	Commentor	Comment
1342	USCIS-2010-0008-1012	Julia Brown, Immigrant Legal Advocacy Project	<p>Comment part 5: III. The proposed changes will place a time and resource burden on ILAP and reduce access to immigration legal services in Maine.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization.</p> <p>At ILAP, we assist clients with fee waiver requests. However, with the increased time burden and documentation burden built into the proposed rule, ILAP would not be able to assist with as many fee waiver requests as we currently do. First, the amount of forms to complete for a family would greatly burden our staff. Second, our staff would have to go through the IRS to get the tax transcript for clients who have a TIN or SSN, or to obtain a certification of non-liability for taxes from the IRS. Anytime we have to coordinate with another agency in completing an immigration form, it adds time and effort for our staff.</p> <p>Our organization would have to reevaluate the services we provide to the Maine immigrant community. Since we are the only statewide immigration legal services provider in Maine, that will necessarily impact the number of individuals in Maine who are able to improve their status. It would force extensive revision of our materials and procedures. For example, ILAP helps LPRs prepare naturalization applications both at our office and at workshops. Applicants bring personal documentation to these events, and complete N-400s with guidance from expert staff. A majority of applicants we assist with their N-400s qualify for fee waivers, and the majority of them use receipt of means-tested benefits to prove their inability to pay the naturalization fee, which has increased by 600 percent since the 1990s. Applicants can quite easily find and bring this proof to a workshop, but they are unlikely to be able to put together a package of sophisticated evidence of income eligibility. As a result, fewer individuals would benefit from our assistance with naturalization applications. ILAP would need to develop new service models, anticipate that fewer of those who seek our assistance would obtain U.S. citizenship.</p>
368	USCIS-2010-0008-0496	Sarah Beckjord	<p>The proposed rule will not increase USCIS's efficiency. Efforts to save money or increase efficiency should not be done at the cost of turning away applicants living in poverty who are entitled to a fee waiver and may not be able to afford the application costs. The proposed rule will create an additional burden for USCIS, fee waiver applicants, and legal services providers. It seems designed to prevent eligible applicants from applying for citizenship and seems contrary to the spirit on which our country was founded.</p>

ID	Comment.	Commentor	Comment
429	USCIS-2010-0008-0582	Sunil Bajagain	<p>I oppose this change because this really doesn't make sense to add more fee to low income immigrants who already in the edge of their income. Also, this will harm ability to get the immigration benefits what low income people really need it. Also, this will add more inefficiency in the USCIS process. This will add more time on processing and wait time.</p> <p>I strongly oppose this proposal</p>
515	USCIS-2010-0008-0633	Karen Camacho	<p>As a proud citizen of the United States, I am writing to urge the Department of Homeland Security to withdraw the proposed rule on fee waivers. It is against our national values to discriminate against immigrants based on their race, national origin, and their wealth and class.</p> <p>The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits.</p> <p>The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. I live in an area where the cost of living is extremely high and home prices, including those in primarily low-income neighborhoods, are rising to the millions. I know that if our family members, friends, and neighbors who are eligible for citizenship tried to apply, they would not be able to pay all of the application fees due to the steep cost of \$725.</p> <p>The rule will disparately target low-income families and working-class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>Instead of placing barriers to citizenship, the federal government should encourage immigrants to apply for citizenship and stimulate the economic benefits that that creates for all. DHS should withdraw its proposed regulation and maintain the ability of applicants to receive a fee waiver by showing that they receive a public benefit.</p>

ID	Comment.	Commentor	Comment
604	USCIS-2010-0008-0983	Kelsey Killoran, United Way of Massachusetts Bay and Merrimack Valley	<p>I oppose the proposed changes to the I-912 Fee Waiver because it will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect.</p> <p>Also, the proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p> <p>Finally, efforts (especially those done in vain) to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. Creating yet another barrier for people in poverty is not the duty of the United States government. Our duty should be to abolish such barriers.</p>
668	USCIS-2010-0008-0818	Annalise Parady	<p>As an intern with a citizenship legal services non-profit, I helped countless legal permanent residents fill out naturalization applications and the accompanying fee waivers. The fee of \$725 dollars is cumbersome and prohibitive for countless immigrants who are working hard to contribute to the rich fabric of our economy and culture. Many immigrant families are living out the American dream by building businesses and homes from almost nothing, and a desire to become an American citizen should not come at a cost to those businesses and families. Attempts to save money or to increase efficiency, as claimed, should not come at the cost to those who are working their very hardest to become good citizens of our country. In addition, this proposal will not increase efficiency as claimed, or reduce time spent adjudicating fee waivers, but rather have the opposite effect. It will create an unnecessary burden for legal services providers like the one that I worked for, for the many fee waiver applicants who simply wish to take the path to naturalization, and for USCIS itself. I earnestly hope that this rule does not go into effect and block the dreams of would-be citizens of the United States.</p>

ID	Comment.	Commentor	Comment
380	USCIS-2010-0008-0519	Joanne Abelson	<p>My name is Joanne Abelson. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver.</p> <p>I volunteer for OneAmerica, a 501(c)(3) organization that helps people apply for citizenship. Just yesterday I was at a clinic and helped people fill out the N-400 form and accompanying fee waiver application. When someone gets means tested benefits, the process is easy and quick. If not, its time consuming and sometime impossible for people to come up with the requisite documentation. This is particularly true for elderly people with the lowest incomes, who are not required to file taxes. Changing the verification requirements would mean that they would be unable to prove they are eligible for the fee waiver.</p> <p>Since more than 95% of USCISs budget comes from immigration fees, the cost of these fee waivers is borne by other fee-paying applicants for other immigration benefits. With means tested benefits, local governments already extensive income verification. The rule does not save general taxpayers any money and will in fact generate more work and cost to USCIS to review additional income documentation.</p> <p>The N-400 filing fee of \$725 is very expensive for many people. Please dont make it harder for immigrants to naturalize.</p>

ID	Comment.	Commentor	Comment
468	USCIS-2010-0008-0609	Zoe Mullery	<p>I am writing to oppose the proposed revision. Fee waivers are essential to preventing American citizenship and residency from being a luxury only for the wealthy. Means-tested benefits are a quick way of allowing fee waivers to be accessed by those already struggling with all the challenges brought by limited income. The paperwork and vetting required to get one of these benefits is significant. People don't just walk in and ask for them. Many documents are required and many hours of waiting in offices and for response times. Once someone has gone through this difficult process, that should be enough to account for their fee-waiver need. I strongly oppose the revision as I believe it would put more burden on already burdened people with the most need. I strongly support America's value of making residency and citizenship accessible and as simple as possible regardless of income.</p>

ID	Comment.	Commentor	Comment
489	USCIS-2010-0008-0617	SUSAN RUSSELL	<p>DHS's proposed rule on fee waivers is appalling, and I urge the Department to withdraw it. Application fees are high; the proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who can't afford them. By creating a barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status. This is not what the United States of America stands for.</p> <p>Other problems with the proposed rule:</p> <p>It would make it more difficult for USCIS to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits.</p> <p>It fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This</p> <p>It thus will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>It will increase the overwhelming backlog of over 750,000 citizenship applications before the agency, extend waiting times for those applicants, which has already recently doubled, or worse, deter eligible immigrants from applying.</p> <p>Our country BENEFITS from the diversity of its population--which derives from the diversity of its immigrants, many of who start out very poor. This rule will ultimately harm us all. I strongly urge DHS to withdraw it.</p>

ID	Comment.	Commentor	Comment
579	USCIS-2010-0008-0688	Diane Baer	<p>I am opposed to the change regarding the fee waiver eligibility for people who cannot afford the \$725 application fee to become a United States Citizen. I know from the personal experience that I have seen in my own family that after coming to the United States and working hard to make a life in this country and to follow all of the steps required to become a United States Citizen, to be stopped because of the fee and the difficulty in finding a way to prove eligibility does not seem right. Moreover, it doesn't seem necessary. Those people most affected by this change will be those who cannot afford to pay the fee. This doesn't mean that these individuals are any less able or committed to working hard, to contributing to this country's economy, to raising their families and to being good citizens. So it is clear that the most vulnerable amongst those applying for US Citizenship would be those negatively affected by this change. Why is this even being considered? Using Income Tax as proof of eligibility does not reflect the fact that there are huge differences in the cost of living in different parts of the country. If I compare the median income in Seattle I find that it is almost twice nearly every county in Texas. A state based means-test would make a lot more sense. Do not put into effect these changes- they would clearly make it most difficult for the vulnerable and especially the elderly to successfully meet the requirements to apply for US Citizenship and the basis for becoming a US Citizen should not be based on one's income but rather one's character and what one contributes to this country.</p>

ID	Comment.	Commentor	Comment
880	USCIS-2010-0008-0785	Natalie Kean	<p>I am writing to oppose the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals, including older adults, and would cause a significant additional burden on communities, federal agencies, and service providers. Moreover, these proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers. Many immigrants who are eligible for naturalization simply do not have the ability to pay the high fee. This may especially be true for older adults who are nearing retirement and living on fixed incomes.</p> <p>Similarly, older adults may lack the resources necessary to submit the Form I-912 and gather the required documentation. On top of this, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees by eliminating receipt of a means-tested benefit as a way to show eligibility for the fee waiver.</p> <p>For these reasons, I urge USCIS not to make the proposed changes and to instead expand the types of documentary evidence accepted to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. Thank you for consideration of my comments.</p>

ID	Comment.	Commentor	Comment
1087	USCIS-2010-0008-1208	Leena Khandwala, The Legal Aid Society	<p>Comment part 1: November 27, 2018</p> <p>Submitted via the Federal eRulemaking Portal Web http://www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of The Legal Aid Society in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Legal Aid Society, the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City — passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform. The Society's unique value is in its ability to go beyond any one case to create more equitable outcomes for individuals, and broader, more powerful systemic</p>

ID	Comment.	Commentor	Comment
361	USCIS-2010-0008-0507	Trevor Rosche	<p>My name is Trevor Rosche. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. Please dont make it harder for immigrants to naturalize.</p> <p>I am a volunteer for OneAmerica, a 501(c)(3) organization that helps people apply for U.S. citizenship with free assistance from volunteer attorneys. Over the years, many of the clients we serve have been eligible for fee waivers based on receipt of public benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people. I oppose the rule for these reasons:</p> <p>Since more than 95% of USCISs budget comes from immigration fees, the cost of these fee waivers is borne by other fee-paying applicants for other immigration benefits. The rule does not save general taxpayers any money and will in fact generate MORE work and cost to USCIS to review the additional income documentation brought about by the new rule. To speed up the process, the fee waiver should stay for the benefit of USCIS and for the applicants.</p>
503	USCIS-2010-0008-0654	Bayle Conrad	<p>The proposed changes to the fee waiver eligibility process is a bad idea because it is wasteful. The means-tested benefit letter is a simple way for low-income immigrants to prove that they are eligible for the fee waiver. These letters are awarded at the state level by government employees who are trained to verify income at the household level. If low-income immigrants are required to use their tax returns to demonstrate their eligibility, then their income status has to be verified a second time, at the federal level. This is a wasteful and unnecessary allocation of taxpayer dollars, and as an American tax-payer, I object to such a wasteful expenditure of my tax dollars. I beg you to reconsider this proposal.</p>

ID	Comment.	Commentor	Comment
936	USCIS-2010-0008-1006	Leah Schubert	<p>To USCIS,</p> <p>I'm writing as a concerned citizen to express my opposition to the fee waiver changes proposed by the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS), USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>My primary objections are as follows:</p> <p>1) The amount of government staff labor and costs will increase because all of these waiver applications must be individually processed rather than the current streamlined system of using already established qualifications from the applicant's state. It will result in an inefficient, duplicative use of government resources.</p> <p>2) The burden on the applicant and support staff at support organizations will increase as applicants must go through a lengthy and complicated application process while likely needing guidance from someone knowledgeable of the process and often an interpreter. Again, it's an inefficient, duplicative process, for the applicant (as well as the government).</p> <p>3) Eligible applicants will be discouraged and prevented from applying due to the increased burden of the process and the lower income required than is currently required. While this may be the intent behind the proposed changes, I see this as a negative outcome of the changes. The potential applicants are within the law and want to remain within the law as they pursue residency and citizenship. Lawful processes should be encouraged, not discouraged. Lower income individuals, in particular, need support to stay within the law and to pursue their rights as American permanent residents.</p> <p>Thank you for reading my comments. They are brief but sincere.</p> <p>Leah Schubert 10600 NE 198th St. Bothell, WA 98011 Attachments (1</p>

ID	Comment.	Commentor	Comment
1102	USCIS-2010-0008-1222	Dorlan Bales	<p>I oppose the proposed rule to stop waiving fees for low income immigrants who are applying for citizenship. I ask that the Department of Homeland Security (DHS) withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a person's use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants' lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working-class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>In calendar year 2017, almost 40 % of citizenship applicants applied for a fee waiver, the majority of which were based on receipt of a means-tested benefit, meaning that the proposed rule has the potential to impact approximately 244,000 immigrants who have the opportunity to obtain citizenship and the right to receive fair and equal treatment from USCIS. Instead, the proposed rule would increase the overwhelming backlog of over 750,000 citizenship applications before the agency, extend waiting times for those applicants, which has already recently doubled, or worse, deter eligible immigrants from applying. This would prevent immigrants' ability to integrate into the country, access higher economic and educational opportunities, and ultimately harms us all. It is for these reasons that I strongly oppose the proposed rule and call on DHS to withdraw it.</p>

ID	Comment.	Commentor	Comment
1117	USCIS-2010-0008-1237	Jorge Baron on behalf of Northwest Immigrant Rights Project (NWIRP)	<p>Comment part 1: November 27, 2018</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121 Submitted VIA Federal eRulemaking Portal</p> <p>Dear Ms. Deshommes,</p> <p>I am writing on behalf of Northwest Immigrant Rights Project (NWIRP) to submit this comment in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>As more fully outlined below, our organization strongly opposes the proposed changes and urges DHS not to move forward with this action. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>Interest in Proposed Changes to Fee Waiver Criteria</p> <p>Northwest Immigrant Rights Project (NWIRP) is a nationally-recognized legal services organization founded in 1984. Each year, NWIRP provides direct legal assistance in immigration matters to over 15,000 low-income people from over 120 countries speaking over 60 different languages and dialects.</p>

ID	Comment.	Commentor	Comment
816	USCIS-2010-0008-0800	MariRuth Petzing	<p>I am an immigration attorney working for a non-profit legal services organization that does extensive work with low-income immigrants, including survivors of child abuse, domestic violence and human trafficking, as well as elderly and disabled adults mostly in rural communities. I am submitting two comments, one on the requirement of using the increasingly complex I-912 form and one regarding the supporting evidence requirements.</p> <p>The proposed changes to the fee waiver request format, eligibility criteria, and accepted documentation will have extremely negative, and in some cases devastating, impacts on the communities I serve and will cause a substantial additional burden on my organization, reducing the number of clients we are able to serve.</p> <p>These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers. The proposed changes would cause members of my community to forgo applications for immigration benefits for which they are legally entitled, causing additional instability and poverty in my community. Many of my clients are unable to afford the substantial immigration filing fees, and economic concerns are one of the most common reasons my clients give for delaying applications for benefits such as renewing green cards, applying for naturalization, obtaining a certificate of citizenship for their children, applying for adjustment of status from U or T status to lawful permanent residency, renewing employment authorization documents for those with deferred action or pending asylum cases, etc. Delaying filing for benefits further impoverishes and destabilizes the community by preventing people from working, from obtaining or maintaining driver licenses or valid identification documents, or pursuing higher education. Additionally, cost is one of the most common reasons community members defer applications for naturalization. The proposed changes will only increase this barrier, causing reduced applications for naturalization. Reduced citizenship leads to fewer community members exercising the rights and responsibilities of citizenship, including voting and serving on a jury. This in turn effects the entire community through disenfranchisement leading to a lack of representation, the foundation of our democracy, and by limiting access to one of our most fundamental rights, the right to a trial by a jury of our peers.</p> <p>The increased requirements will most negatively impact the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. At the same time, they often lack information and access to financial documents of their households. Many survivors I work with have fled their homes and have no access to documents under the control of their abusers. Requiring specific documents will create extreme burdens on such survivors and will lead to delays in applications or survivors being unable to apply for benefits, or will result in survivors endangering their safety to obtain the required documentation from an abuser.</p> <p>Additionally, I work with many disabled adults for whom the complex immigration forms are an insurmountable barrier. This means that forcing them to use an</p>
68	USCIS-2010-0008-0218	Abel Luna	<p>The proposed changes to Form I-912 will only hurt the least amongst us. The people who are trying to become full citizens of our country should be encouraged to do so not hinder them. These people are already having difficulties with an array of issues in their new country and adding more cost and problems is not helping them or our country. This country should make it simple and easy for everyone to become full and productive individual, serve our country and better their lives. Helping this folks now will pay dividends in the future and that is great for everyone. Thank you for your consideration to this matter.</p>

ID	Comment.	Commentor	Comment
71	USCIS-2010-0008-0224	Elizabeth Farmer	<p>I believe that the proposed revision to the fee waiver process is wrong headed and I object to its implementation. People with the lowest income will be most negatively impacted, including elderly. Changing the verification requirements to eliminate means tested benefits will make it almost impossible for many elders to prove they are eligible for the fee waiver.</p> <p>USCIS should not punish low income families by changing current requirements. Please do not enact this rule change.</p>
135	USCIS-2010-0008-0289	Len Zangwill	<p>To Whom It May Concern,</p> <p>I disagree with the proposals to narrow the eligibility for the fee waivers for applications and petitions for USCIS services. This is regarding OMB Control Number 1615-0116, the USCIS proposal around the I-912 fee waivers, and the Docket ID USCIS-2010-0008.</p> <p>I think that the proposal is geared to lessening the number of fee waivers given, This creates the effect of potential applicants essentially carrying the burden of the agency's budget. If someone qualifies for an income-based program, they most likely will find it difficult to also pay the regular fees for the various affected petitions for services. This proposal hurts those who are the most likely to experience great difficulty paying for these petitions. This will create an unnecessary barrier for these people.</p> <p>I request that the said proposal be withdrawn.</p>

ID	Comment.	Commentor	Comment
231	USCIS-2010-0008-0378	Astha Tada	Making it so difficult so that it becomes so burdensome to become a citizen does not allow our democracy to benefit from the skills of those who are not well endowed financially. Brainpower and creativity exists in all levels of people and we lose out by this kind of narrow financial screening. Diversifying our society is healthy and allows us to benefit from the numerous gifts people share when they live in our country.
326	USCIS-2010-0008-0467	Chris Modlish	I strongly oppose this proposed change. The only purpose it seems to serve is to discourage low-income individuals from applying for citizenship. The process is already confusing and burdensome for these individuals. Requiring impoverished applicants to produce additional paperwork, paperwork they may not even have access to, will unnecessarily create a large additional burden not only for these applicants, but also for USCIS, and legal services providers.

ID	Comment.	Commentor	Comment
352	USCIS-2010-0008-0494	Elizabeth Fountain	<p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>These changes will place a heavy time and resource burden on individuals who apply for the immigration benefits for which they qualify, making it less likely that they will be able to apply. They will increase the burden on government agencies that process waiver requests, increasing government inefficiencies. They will also increase the burden on legal service providers who work with individuals as they apply for immigration benefits. Without the ability to make legal and appropriate applications, fewer people will be able to navigate the already challenging path in seeking the legal status which allows them to be fully contributing members of our community. As a member of a community that relies to a great extent on immigrants for contributions of labor in our agricultural and service industries, I speak out against any regulations that increase the already inefficient and burdensome system.</p> <p>Our country has an historic commitment to welcoming immigrants, and a vital economic and national security interest in making the ability to gain legal status as efficient and inclusive as possible.</p> <p>I strongly oppose these proposed changes which have only negative impact on our community.</p>
886	USCIS-2010-0008-0793	John Wong	<p>I oppose the proposed changes to the fee waiver eligibility criteria as it targets and places an unnecessary burden to the most vulnerable and makes it harder on those applying for the waiver</p>

ID	Comment.	Commentor	Comment
1478	USCIS-2010-0008-1236	Maricela Gutierrez on behalf of Services, Immigrant Rights, and Education Network (SIREN)	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers. At SIREN, our clients who are seeking fee waivers already encounter challenges in obtaining them under the existing process. Many of our clients face difficulties in gathering the documents that are needed including for those seeking waiver eligibility based on income or financial hardship. With the proposed elimination of means-tested benefits as an avenue for fee waiver eligibility, being able to prove that are qualified based on income or financial hardship can be an insurmountable obstacle. Tracking the required documents down is especially difficult for clients who may not have easy access to documents needed, encounter language barriers in seeking these documents, are not familiar with navigating the internet to get documents, or those who elderly. Gathering an accurate tally of expenses and income is challenging given that both fluctuate considerably for our clients, especially for those who are work in the “gig economy” or depend upon seasonal work. Based on the experience of our clients, the process should be less, not more, burdensome in terms of the resources and time.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p>

ID	Comment.	Commentor	Comment
699	USCIS-2010-0008-0850	Melissa Smyth	<p>I strongly oppose this proposed change. It would not serve the purposes it purports to serve; in fact, it would impose a greater administrative burden on the agency and produce results that are farther from the intent of the fee waiver eligibility assessment procedure. I have assisted naturalization applicants in requesting fee waivers, and the majority of people I worked with used a means-tested benefit to prove their eligibility for a fee waiver. A means-tested benefit is just that: means-tested by a government agency, which has already done the necessary analysis. Requiring proof of income through other paperwork would be difficult for many to do, and it would make it more difficult for USCIS to process applications. The agency would have to expend additional resources assessing these documents and determining whether the income reported, family size, and other factors qualify the applicant for a fee waiver. This is an unnecessarily duplicative process and would only result in further backlog and delays in processing applications. The fee waiver is intended for those who are unable to pay the prescribed fee for an immigration benefit. This change would add an unnecessary burden and prevent many who are unable to pay the fees from applying, simply because they are unable to produce paperwork meeting these arbitrary requirements. This change makes the paperwork requirements more difficult for no practical reason, and would result in many otherwise eligible applicants being unable to afford the fees.</p>

ID	Comment.	Commentor	Comment
1303	USCIS-2010-0008-0768	Koula Glaros- King, Community Legal Aid	<p>Comment part 1: Dear Ms, Deshommes:</p> <p>Comment on Proposed Revisions of Form 1-912, Fee Waiver Request:</p> <p>Pursuant to the public request for comments, Community Legal Aid submits these comments regarding the proposed changes to fee waiver eligibility criteria, USC1S Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. Community Legal Aid provides legal assistance for eligible residents of our eight-county area in Northeast Ohio who have income less than 125% of the Federal Poverty Level. All our immigration clients should all be eligible for fee waivers.</p> <p>We urge USCIS not to change Form 1-912 and its instructions as proposed, especially with regards to requirements for information for all three grounds of eligibility for fee waiver. Currently the fee waiver may be established with proof of any of these grounds; that applicant's household income is less than 150% of the Federal Poverty Level, the household is eligible for public benefits, or the household has a financial emergency. The proposal duplicates already well-documented government proof of applicants poor financial condition and would require applicants with very limited resources to invest additional time and effort to obtain more extensive proof. It would frustrate and delay applicants' ability to receive the most basic immigration and identity benefits they need to help them move out of poverty.</p> <p>This is particularly urgent for non-citizens in Ohio for two reasons. First, for the most part, non-citizens are not eligible for any public benefits. Second, a non-citizens' state driver's license or ID card expires with their immigration document even though their actual immigration status remains very much valid. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p>

ID	Comment.	Commentor	Comment
692	USCIS-2010-0008-0801	Maryann Obrien	<p>Efforts to save money should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. A fee of \$725 is very expensive.</p> <p>The proposal rule will not increase USCISs efficiency or reduce ISCISs time adjudicating fee waivers; the proposed rule would have the opposite effect.</p> <p>The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants and legal services providers.</p> <p>Registering new immigrants to vote is one of the most amazing citizenship opportunities I have ever experienced.</p>

ID	Comment.	Commentor	Comment
61	USCIS-2010-0008-0208	Vanessa Reyes	<p>I strongly object to the means-tested benefits option being removed from the form I-192. Changing the rules to eliminate the receipt of means-tested benefits as evidence to support a USCIS fee waiver will have a devastating effect on the ability of immigrants to live and work in this country, and I urge you to not to do it. In particular for the I-912 application, eliminating the means-tested benefit portion of the I-912 will hit certain classes of people extremely hard. Asylees, for example, who are expected to file for their green card application after one year in the U.S., often find themselves unable to pay for the exorbitant \$1,225 I-485 adjustment application fee, but may be making just enough of a wage to bring them above the poverty guidelines. The same may be true of an I-131 application or an I-601 waiver application for similar populations. Since gaining lawful permanent resident status and the ability to travel are essential for immigrants living here who otherwise qualify for those benefits, these fees amount to a massive cut out of their income and only serve to keep them in poverty or close to it.</p> <p>It is also worth noting that analysis of a means-tested benefit is often much simpler and far less time-consuming than analyzing whether someone's household income is below the poverty guidelines threshold. Obtaining evidence of low income can often become a case of "proving the negative" for those who may have just lost their job, but whose most recent paychecks and tax return show a full income. Time and resources will therefore be wasted for both the applicants and the officers reviewing these applications. Some applications may be incorrectly rejected on that basis, causing, at the very least, frustration for the applicant and, at its worst, loss of an immigration benefit due to an untimely filing. Filing on the basis of a "financial hardship" is not a fix for this situation, either, as it still requires time and resources from the applicant and the officer to analyze, involves "proving a negative" again in many cases, and typically requires presenting evidence of a hardship above and beyond the struggle to stay out of poverty.</p> <p>Lastly, this proposed change and others like it are already harming vulnerable groups of people, as they are afraid of approaching anything that even looks like a means-tested or governmental benefit. Perhaps that is the intended effect, but honest, non-U.S. citizen members of the public who qualify for these benefits are frightened from applying for benefits that they truly need. I am aware, for example, of pregnant young mothers who are fearful of receiving even secondary benefits from the Michigan Department of Health and Human Services because they are unsure how it could affect them, their family, or any immigration case they are pursuing.</p> <p>For these reasons above, I am strongly opposed to this change.</p>

ID	Comment.	Commentor	Comment
285	USCIS-2010-0008-0420	Christopher Helm	<p>I am an immigration lawyer, and have been for over 30 years. I have contributed countless hours to citizenship clinics where we assist legal permanent residents to apply for citizenship. Many have had their LPR status for decades but have been unable to apply for US citizenship because of the high cost of applying. All are substantial contributing members of society who were unable to take the next step due to the expense. Some of them are receiving public benefits due to injuries sustained in the work place or due to illness. Yet others have received public assistance in the past but are now returning more than their share in taxes. If any of them were unable to get fee waivers when they needed them to apply for citizenship, it would be a great miscarriage of justice as these hardworking future citizens would have to wait, sometimes indefinitely to apply because of the proposed limitations.</p> <p>In addition, refugees and other immigration community members could decide to forego medical care for their family members if the were afraid that public benefits that would enable them to seek help could be used as a basis to deny them certain immigration benefits, including availability of the fee waiver.</p> <p>I strongly urge you not to adopt the proposed regulations.</p>

ID	Comment.	Commentor	Comment
356	USCIS-2010-0008-0500	Danielle Rosche	<p>As an attorney who represents low income individuals and volunteers with organizations helping low income individuals I strongly oppose the changes to the fee waiver removing receipt of other means tested benefit as a way to qualify for the fee waiver. Removing this was of proving eligibility duplicates the work that we will have to do as representatives of low income individuals AND more importantly the work that USCIS adjudicators will have to do in order to decide the waivers.</p> <p>If our taxes are already paying state or local benefits-granting agencies to verify household income for those applying for benefits, there is no need for USCIS to redo this work? USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed, especially when processing times are at a historic high.</p> <p>I volunteer at the WNA clinics because they fill the gap in legal services for low income clients. But we just meet with clients for the one day. Demand for services is high and we dont have the time or resources to document income in the way the proposed regulation would require. We would end up serving fewer people. We would have to refer these people out who cannot afford legal services, and they may end up not applying at all.</p> <p>Inability to naturalize makes family unification less likely and weakens families. American values should include equal access to immigration and citizenship benefits regardless of wealth. This rule violates that value.</p>

ID	Comment.	Commentor	Comment
378	USCIS-2010-0008-0526	Lily Niland	<p>Hello,</p> <p>I have worked as a legal assistant, interpreter, and translator in immigration law for seven years. I have completed countless fee waiver applications. In addition to the humane arguments I could present about people who have good moral character but limited income deserving equal access to the immigration status for which they qualify, I'd like to simply point out the greatly increased administrative burden that this change would mean for you and for me.</p> <p>The majority of the fee waivers I have completed over the years have been for applicants receiving means-tested benefits. This type of application takes ten minutes or less for me to complete, and I imagine takes even less for you to review.</p> <p>Fee waivers based on household income can take hours to compile, and I'm sure take much longer for you to review and verify. They involve tax returns, pay stubs and more, covering the last 12 months for every member of the household, even if only one of them is completing an immigration application.</p> <p>For those who do not qualify for means-tested benefits, this labor-intensive process may be their only option for a fee waiver. However, for those who do qualify for means-tested benefits, why waste time and money reviewing needlessly complicated applications? If one government agency has already determined that this applicant is low-income, why waste tax dollars requiring your agency to reinvent the wheel and start from scratch in re-verifying that yes, that same person is low-income, just as the other agency determined they were?</p> <p>Please take these comments into consideration as you decide whether to move forward with your proposal.</p> <p>Thank you for your time.</p>
396	USCIS-2010-0008-0583	Ian Donohue	<p>The proposed changes to the fee waiver is erroneous because the original method works. There has been no study or evidence that anything has been falsified or problems. by adding additional steps and paperwork there is more chance of human error on both parts of the applicant and those viewing the applications. By changing the fee waiver, that is money that could be spent on the families in the forms of nutrition, education, and housing</p>

ID	Comment.	Commentor	Comment
463	USCIS-2010-0008-0640	Xiangping Chen, Asian Counseling and Referral Service	<p>As a immigration service provider, I believe the proposed changes to the fee waiver eligibility process is unnecessary and wasteful. If a client is receiving means-tested benefit, this means his/her income has been checked and verified by local welfare system. By IRS regulation, some of them are not required to file income tax due to their low-income. Therefore, this proposed changes will cause unnecessary paperwork and waste human resource to send their income to be verified a second time. As an American tax-payer, I object to such a wasteful expenditure of my tax dollars.</p>
496	USCIS-2010-0008-0628	Christina Guros	<p>I oppose the proposal by US Citizenship and Immigration Services (USCIS) to change the eligibility for the fee waiver process because the reasoning behind the change is illogical and false.</p> <p>USCIS claims the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver and that the proposed rule change will reduce the paperwork to be reviewed by USCIS. Both arguments are flawed and untrue.</p> <p>First, the vast majority of states have similar income requirements for federally-funded means-tested benefits. For example, most states hold a standard for granting Medicaid benefits that is below the 150 percent of the federal poverty line threshold used for USCIS fee waivers. Generally, the threshold is at 133 percent of the poverty line with some states stretching to 138 percent (https://www.policygenius.com/blog/a-state-by-state-guide-to-medicaid/). Similarly, eligibility for Supplemental Nutrition Assistance Program (SNAP or Food Stamps) cuts off at 130 percent of the federal poverty level (https://www.cbpp.org/research/food-assistance/a-quick-guide-to-snap-eligibility-and-benefits).</p> <p>If it were the goal of USCIS to ensure that proof of means-tested benefits receipt aligned with the 150 percent of the federal poverty level, then USCIS could offer stipulations on the types of means-tested benefits that could be used to prove fee waiver eligibility, instead of dropping the category altogether. For example, if states choose to offer state-funded supplemental benefits for individuals over 150 percent of the poverty line, USCIS could require that the proof of means-tested benefits receipt demonstrate receipt of federally funded means-tested benefits to ensure a standard income. If expanded Medicaid allows for too much variation in the income eligibility standards, USCIS could require receipt of SNAP benefits or other benefits that are necessarily capped at or below 150 percent of the federal poverty line.</p> <p>Similarly, USCIS could require that the benefits letters submitted for fee waiver applications show evidence of the household income as determined by the benefits-granting agency. Advocates could work with local and state benefits agencies to ensure all status letters include the income determination to meet this requirement. This would give USCIS a straightforward way of determining a familys income for fee waiver eligibility. The argument that USCIS makes to put forth this rule change proposal to ensure applicants are below 150 percent of the federal poverty level is false, in that they have other options to ensure this aside from eliminating public benefits receipt as a means to prove eligibility.</p> <p>likewise, the argument that this change would reduce paperwork and USCIS time is absolutely false. A benefits status letter is one piece of evidence to be reviewed by</p>

ID	Comment.	Commentor	Comment
566	USCIS-2010-0008-0680	Christina Guros Pena	<p>I oppose the rule change proposed by the Department of Homeland Security to change the fee waiver process because it would make Seattle-based nonprofits suffer.</p> <p>The Department of Justice (DOJ) provides a Recognition and Accreditation (R&A) program for nonprofit agencies and their non-attorney staff to be certified to provide legal representation to low-income clients. The DOJ R&A program is intended to expand the availability of high quality, low- or no-cost services for families in need of immigration assistance but unable to afford a lawyer.</p> <p>The proposed change to the eligibility standards for the US Citizenship and Immigration Services (USCIS) fee waiver process would negatively affect the R&A infrastructure established by the DOJ to serve clients in need of the fee waiver. An estimated two out of three fee waivers filed to USCIS is on the bases of public benefits (https://cliniclegal.org/fee-waiver-changes). The proposal to eliminate public benefits as an eligibility option for the fee waiver will make it harder for two thirds of applicants to gather the necessary documents to file Form I-912. It will make it especially difficult for the most vulnerable applicants to prove eligibility, as those who are elderly and disabled are more likely to rely on public assistance and not have tax filings readily available to produce for a fee waiver application.</p> <p>This proposed change will have hugely negative effects on Seattle. The DOJ regularly publishes updated R&A lists, and the most recent list shows 21 Recognized agencies and 45 Accredited staff within the city of Seattle. There are dozens more Recognized agencies and Accredited staff in King County. All of these agencies serve mostly low-income clients, a requirement of the DOJ Recognition standards. As such, these agencies will see a large portion of their caseloads be unable to produce the necessary evidence required by the new fee waiver standards.</p> <p>A Seattle-based agency with one DOJ Accredited Representative might screen 175 individuals annually, and take on 100 of those cases for representation, filing naturalization, green card and work permit applications. If 80 percent of their cases qualify for fee waivers, and 70 percent of those currently qualify on the basis of receiving public assistance, this represents 56 clients. Under the new rule, these 56 clients would need to obtain last years federal tax filing and current proof of income other than evidence of receipt of public benefits. If even half of these clients did not file taxes for the previous year because their income was below the threshold required to do so, this would represent 28 cases for which the Accredited Representative would need to assist in a late tax filing or obtaining an Internal Revenue Service Verification of Non-Filing Status.</p> <p>Already this represents dozens of hours of additional work for these clients. For those who earned zero income in the previous tax year, USCIS would likely require</p>

ID	Comment.	Commentor	Comment
895	USCIS-2010-0008-0831	Lorraine Mills- Curran	<p>This proposal will not accomplish the desired end. When financial need has been established by one system that is trustworthy, how is it efficient to take the same documents and subject them to an additional review by another arm of government? This simply adds more expense and delay for people who are doing what we say we want immigrants to do - following the rules and trying to be responsible citizens of a country that has long since determined they are not a threat in any way. It is difficult to find a reason for this regulation beyond voter suppression.</p> <p>I work with immigrants, and this is one more way we are saying you are not welcome.</p>
956	USCIS-2010-0008-1032	Allison Carney	<p>An income-based fee waiver takes at least 6 times as long to fill out than a benefits-based fee waiver. Organizations like OneAmerica will be able to help only a fraction of those who cant pay the full fee.</p> <p>This proposed rule is inequitable and unfair to the people who need the most support. Please do not adopt this new, disastrous rule!</p>

ID	Comment.	Commentor	Comment
1004	USCIS-2010-0008-1101	Sharone Kaufman, Catholic Migration Services	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>Catholic Migration Services, Inc. ("CMS") respectfully submits the following comments related to proposed revisions to Form 1-912, Request for Fee Waiver.</p> <p>CMS, a not-for-profit legal services provider affiliated with Catholic Charities of Brooklyn and Queens and the Roman Catholic Diocese of Brooklyn, provides free legal services and Know Your Rights education to low-income individuals regardless of race, religion, ethnicity, national origin, or immigration status. We assist immigrants with immigration legal services, housing legal services, and immigrant workers rights legal services.</p> <p>As an organization that represents low-income clients from New York City on various immigration forms, it is evident to us that restricting those eligible for fee waivers will result in a great detriment to the immigrant community not only in our city, but the entire country.</p> <p>General</p> <p>The proposed change to the current form, which is already burdensome due to its length, will undoubtedly prevent many people from benefitting from a fee waiver they need and for which they are eligible. By eliminating the use of means-tested benefits to determine eligibility, people with the greatest need for a fee waiver will be excluded from applying for documents they need for their livelihood, further impoverishing them and restricting their opportunities to pull themselves out of poverty. Furthermore, eliminating the means-tested benefit category from the 1-912 would lead to more uneven distribution of fee waivers between states, and a lengthier and more time consuming process for USCIS to adjudicate the 1-912.</p> <p>A "means-tested benefit," as defined in the 1-912 instructions, is a "public benefit where a person's eligibility for the benefit, the amount of the benefit, or both, is based on the person's income and resources." Currently, USCIS considers means-tested benefits that are "Federally, state, or locally funded and granted by the benefit agency." When a person receives a means-tested benefit, their income and household size — whether there are elderly, disabled, or pregnant household members — are considered in the state or local means-tested eligibility analysis. Therefore, there seems to be no more reliable or efficient way to assess a</p>
1076	USCIS-2010-0008-1196	Teresa Stecker	<p>As a non profit organization that provides immigration legal work, we oppose these changes due to the fact most of our clients are on means tested benefits and this will greatly impact their ability to file applications that accept fee waivers - specifically citizenship application. As a non profit this will put an extra burden on our work to assist with fee waivers. This will negatively impact our work which is critical for vulnerable immigrants. Please do not change this.</p>

ID	Comment.	Commentor	Comment
1103	USCIS-2010-0008-1223	Dawn Noelle Smith Beutler, Church of the Sojourners	As a U.S. Citizen who has received means-tested benefits in the state of California in the past, and knows the arduous process of proving income to qualify for services, it seems that this proposed change would only serve to deny the fee-waiver benefit to applicants residing in states with a higher cost of living. Why repeat the work of local agencies? What a person can afford greatly depends on the cost of living in balance with income. Both of these vary from state to state. Please do not eliminate receipt of means-tested benefits as a measure of granting fee-waivers to applicants.
1135	USCIS-2010-0008-0411	Veronica Serrato, Project Citizenship	<p>Comment part 5: Iv. The Proposed Change will not minimize—and instead will increase— the burden of the collection of information on those who are to respond.</p> <p>The Proposed Change increases the burden on respondents. As stated above, the incomebased fee waiver is onerous and requires documentation including the most recent month's income for every household member.³ Moreover, in our experience, between 50-75% of income-based fee waivers filed by our clients are initially rejected and must be resubmitted; the vast majority of resubmissions are ultimately approved by USCIS. This will create an additional burden on USCIS, respondents, and the services organizations that assist with fee waiver filings. We fear that the increased burden on respondents will have a chilling effect on applicants. The filing fee for Form N-400, Application for Naturalization, is \$725. The fee for Form N-600, Application of Certificate of Citizenship (for children who derive citizenship from a parent) is \$1,170. These fees are prohibitively expensive for many of our clients, who are lawful permanent residents eligible for citizenship. The elevated burden of applying for a lowincome fee waiver may deter them. For those who apply for a fee waiver and are initially rejected, the burden of resubmission may deter them. Either way, applicants who currently receive means-tested benefits will be deterred from pursuing citizenship because of the burden of collecting information required to prove low-income eligibility and preparing the accompanying income-based fee waiver application. Those same applicants would have been otherwise approved on the basis of receipt of their means-tested benefits.</p> <p>Ten percent of our organization's caseload is the submission of N-648's to accompany N-400's. We have found that applicants who are unable to speak English due to a physical or cognitive impairment disproportionately rely upon means-tested benefits to show eligibility for fee waivers. Burdening these often elderly and disabled populations by requiring additional evidence will not further USCIS's stated goals.</p> <p>The Proposed Change will have a crippling effect on our organization, and organizations like ours. We rely on volunteers and pro bono assistance to support our clients. Non-profit</p>

ID	Comment.	Commentor	Comment
1148	USCIS-2010-0008-1093	Ellen Katz, William E. Morris Institute for Justice	<p>Comment part 4: III. The Proposed Change Will Result in Financial Hardship for Applicants</p> <p>For applicants barred from fee waivers under the proposed rule who somehow find a way to pay the full fee for an application, the financial repercussions of an unaffordable expense will be severe. For a family of four living at 175 percent of the Federal Poverty Limit, eligible for public benefits like SNAP and CHIP but required to pay full fees under the proposed rule, an application for a replacement permanent resident card would cost nearly 15 percent of monthly income.¹¹ This is income needed for basic necessities like food, shelter, and health care. The inevitable financial tradeoffs created by fees a family cannot afford will have dramatic impacts on the wellbeing of families whose financial needs are evidenced by eligibility for and receipt of means-tested benefits.</p> <p>Studies show that “financial shocks,” or necessary expenses that an individual cannot afford, can have devastating consequences for low-income families, including for people above the 150 percent of the FPL threshold proposed by the rule. For example, 50% of families who rent their home and have income under 200 percent of the poverty line report low confidence in their ability to cover an unexpected expense of \$400,¹² an amount at the low end of application fee costs. Especially where expenses are deemed critical by an individual or family, a quality which could foreseeably be ascribed to an immigration application, research shows that people living in or near poverty will forego other needs to try and make those payments. Multiple studies examining income volatility show financial shocks increase the likelihood of that a family will experience food insecurity, meaning that unexpected costs cause families to go hungry.¹³ This effect unfortunately extends beyond nutrition, as families forced to pay for needed expenses they cannot afford will skimp on medical care, utilities payments, educational costs, and other essentials so that they can cover the unexpected cost. Thus, the proposed rule will needlessly amplify the effects of poverty for people who are no longer eligible for fee waivers.</p> <p>Conclusion</p>

ID	Comment.	Commentor	Comment
1331	USCIS-2010-0008-0999	Neal Dudovitz, Neighborhood Legal Services of Los Angeles County	<p>Comment part 3: 3. The rule would increase the need for legal representation, creating an additional financial obstacle for applicants, and it would burden non-profit legal organizations.</p> <p>A higher evidentiary burden will increase the need for legal representation by unnecessarily complicating the process for individuals who merit a fee waiver. Currently, applicants may learn how to file 1-912 Fee Waiver Requests by attending workshops or self-help presentations held by non-profit legal organization. Through these programs, they can learn how to easily complete the 1-912 Fee Waiver Request in conjunction with proof of their means-tested benefit. Complicating the process for filing a fee waiver will result in the need for individual assistance on a fee waiver application. Applicants will end up accruing additional fees for seeking legal assistance on the 1-912 Fee Waiver Request form when they could have simply attached evidence of their means-tested benefits. It will also force those who cannot afford attorneys, to seek out notarios or other unauthorized practitioners of law, increasing the risk that applicants will be exploited and overcharged and have poorly prepared applications.</p> <p>Furthermore, in its Notice of Proposed Rulemaking, DHS estimates the annual burden on the public as 409,650 hours. This means that legal services organizations that serve low-income clients will spend more time collecting evidence of income for one applicant, instead of assisting multiple clients, in cases where a letter from a state agency could have sufficed.</p>
657	USCIS-2010-0008-0998	Julie Pasch, Houston Immigration Legal Services Collaborative	Comment part 1:

ID	Comment.	Commentor	Comment
265	USCIS-2010-0008-0411	Veronica Serrato, Project Citizenship	<p>Comment part 1: The Proposed Change is not necessary for, and will undermine, the proper performance of the functions of USCIS, and will not have practical utility.</p> <p>A. The Proposed Change will result in increased burden on USCIS.</p> <p>The Proposed Change is not necessary for the proper performance of USCIS's functions and will not serve any practical purpose. The stated goal of USCIS is to laldminister the nation's lawful immigration system, safeguarding its integrity and promise by efficiently and fairly adjudicating requests for immigration benefits while protecting Americans, securing the homeland, and honoring our values." The Proposed Change will not further that goal. Rather, the Proposed Change will negatively impact the performance of USCIS and decrease USCIS's efficiency. The Proposed Change requires that USCIS review proof of income for every household member, and household size, for every applicant in every case — greatly increasing the burden on USCIS in adjudicating fee waiver requests.</p> <p>Under existing Form 1-912 requirements, the majority of applicants who obtain fee waivers qualify for fee waivers by establishing that they receive a means-tested benefit. Meanstested benefits include SNAP (food stamps), SSI, section 8 housing, fuel assistance, Ternporary Assistance for Needy Families, and Medicaid. These federal- and state-run programs have rigorous eligibility requirements. Individuals applying for fee waivers under the current Form I-912 based upon receipt of a means-tested benefit have already proven to the satisfaction of governmental agencies that they meet the eligibility standards for those benefits. There is no increased efficiency or accuracy gained in updating income information, resubmitting that proof of income, and having it re-adjudicated. The Proposed Change would require USCIS to reevaluate the eligibility of low-income individuals who have already met stringent standards at state and federal levels. This is a waste of limited government resources and taxpayer dollars. USCIS will need to review extensive dourcnentation for each fee waiver application and make income-based determinations that could have been made quickly and easily using the meanstested</p> <p>benefit standard, efficiently capitalizing on work already completed by the government. The Proposed Change excludes from consideration highly motivated and</p>
379	USCIS-2010-0008-0524	Lilibeth Tapia	<p>I strongly oppose this proposed change for the Elimination of Receipt of Means-Tested Benefits as Basis for Immigration Application Fee Waivers. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. Additional paperwork will be more burdensome and time consuming for both applicants and USCIS.</p>

ID	Comment.	Commentor	Comment
500	USCIS-2010-0008-0622	Dd Swan, Dd Swan Consulting	<p>I have worked in the immigrant community in Portland, Maine for the past decade. Throughout that time, I have had the opportunity to celebrate many on their day of becoming a U.S. citizen. I have also watched many others struggle with the language barrier, very long waits, and the limited access to legal help, despite a very robust Immigrant Legal Aid program in our state. People need our help, not barriers that create a hindrance.</p> <p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p>

ID	Comment.	Commentor	Comment
541	USCIS-2010-0008-0683	Ramon Garrido	I am writing to sate my strong opposition to USCIS eliminating receipt of public benefits as a way to prove eligibility for a fee waiver. This change will reduce the capability of non-profits that help applicants because the time to complete an income-based fee waiver is several times longer than a benefits-based one. The additional paperwork will add USCISs workload, and extend the already long processing time for citizenship applications. This change will adversely affect the elderly, low income and unemployed people who will have difficulty gathering the necessary additional documentation and will again reduce the capacity of organizations who are trying to help them.
545	USCIS-2010-0008-0721	Jonathan Betz- Zall	I oppose the proposed revision because it removes from consideration the most-often-used means of proving eligibility for the fee waiver when applying for US citizenship. Many of the people affected would face serious barriers to filing income taxes, and filing those taxes would impose significant hardships upon them. Those income tax filings only reflect the preceding year, omitting significant life developments that may have occurred since the end of the past year. Therefore, I ask that applicants for fee waivers be allowed to use public benefit letters, among other proofs of eligibility.

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862	USCIS-2010-0008-0814	Sarah Crosky	<p>I do not support the proposed rule for following reasons:</p> <p>--The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect.</p> <p>--Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p> <p>--If USCIS supports providing fee waivers to applicants based on need, then it should trust the judgement of Federal services that provide means-tested benefits at the state level and thus continue to accept means-tested benefits as a form of valid documentation for fee waiver eligibility.</p> <p>--The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p>

ID	Comment.	Commentor	Comment
993	USCIS-2010-0008-1086	Sandy Santana, Children's Rights	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 Fed. Reg. 49120</p> <p>Dear Ms. Deshommes,</p> <p>Children's Rights appreciates this opportunity by the United States Citizenship and Immigration Services (USCIS) to comment on USCIS's proposed changes to Form 1-912, which was published in the Federal Register on September 28, 2018. Children's Rights is a nationwide organization advocating on behalf of children in government systems across the country. Through strategic advocacy and legal action, Children's Rights holds government accountable to America's most vulnerable children. Children's Rights can thus provide valuable insight on the adverse effect of USCIS's proposal on children and families.</p> <p>USCIS has proposed eliminating the receipt of a means-tested benefit from the eligibility criteria considered for the determination of a fee waiver in conjunction with Form 1-912. The proposed rule should be rejected for three principal reasons. First, the proposed rule will directly increase the burden and cost not just on applicants but also on the government in determining whether to grant a fee waiver. Second, the proposal would decrease the consistency in the award of fee waivers to applicants. The receipt of a means-tested benefit as an eligibility criteria is an efficient proxy for USCIS officers to adjudicate whether an applicant has demonstrated an inability to pay. It allows USCIS adjudicators to consider the amalgam of variables that factor into the</p> <p>standard for granting a fee waiver with a simple binary test: has the individual received a means-tested</p>

ID	Comment.	Commentor	Comment
1070	USCIS-2010-0008-1190	Lisa Schreibersdorf, Brooklyn Defender Services	<p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Brooklyn Defender Services in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. BDS is a full-service public defender office in Brooklyn, New York, representing nearly 35,000 low-income New Yorkers each year who are arrested, charged with abuse or neglect of their children, or face deportation. BDS also provides a wide range of other services to our clients, including help with housing, education, employment, and representation in affirmative immigration applications. Since 2009, BDS has counseled, advised or represented more than 10,000 immigrant clients, including many under the age of 18. We are a Board of Immigration Appeals-recognized legal service provider. About a quarter of BDS's criminal defense clients are foreign-born, roughly half of whom are not naturalized citizens and, therefore, at risk of deportation or losing the opportunity to obtain lawful immigration status as a result of their</p>

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1075	USCIS-2010-0008-1195	Kayla Walker	<p>As a former AmeriCorps member serving at a citizenship services non-profit, I worked with hundreds of clients a year to gather documents for their citizenship applications, including documents to support their request for a fee waiver. Clients who had been here three years or thirty benefited from the relative ease of a system that did not duplicate efforts as the proposed change does and could focus more fully on the substantive content of the rest of their application. From a service provider standpoint, the number of clients we would be able to serve would be drastically decreased if we had to fully complete the I-912 for each eligible client. A fee waiver using means-tested benefits takes a service provider about 10 minutes to fill out; an I-912 often takes several hours to calculate and collect information from the client. The negative impact on service providers and their subsequent inability to aid clients through the complicated citizenship process cannot be overestimated.</p> <p>As to the effect on clients, the proposed change will increase confusion and decrease applications of eligible applicants. The fee is one of the barriers clients cited most as to why they waited as long as they did to apply for citizenship. When the process to waive the fee becomes more involved and complicated, more eligible LPRs will choose not to apply. This hurts them, as they are not eligible for all benefits and modes of participation in civic society, but mostly hurts the U.S. Talented, intelligent, entrepreneurial people will be weaned out through the added obstacle the proposed revision creates to their citizenship. About 30% of our clients took out a loan, got a credit card, or bought a house or condo after becoming a citizen. Fewer barriers to citizenship mean increased participation in and contribution to the economy. Our clients are also increasingly scared and frustrated by a process that seems to want to shut them out from opportunities they are already eligible for. This is a procedural step that further isolates them and sends the message that they do not belong in this country, even though many of them have been in the U.S. for decades and are part of what makes this country unique.</p> <p>In regards to the workload for USCIS, the proposed revision increases the amount of work without a corresponding increase in utility. This is bureaucratic duplication of efforts at its finest. Various government agencies already put in the time and effort to calculate eligibility based on the same standards used to calculate immigration fee waiver eligibility, To require each and every fee waiver applicant to provide information for all working family members is a gigantic burden in calculation and verification of eligibility. Rather than increasing accuracy, this is likely to increase inconsistency between government agencies and within an application itself as the number of people handling household data increases.</p> <p>The proposed revision inefficiently increases the burden of fee waivers upon legal service providers and USCIS alike. It duplicates effort without providing corresponding merit, and unnecessarily increases obstacles for eligible LPRs.</p>

ID	Comment.	Commentor	Comment
1178	USCIS-2010-0008-0906	Rebecca Schaeffer, Church World Service	<p>Comment part 3: The Proposal Will Burden All Stakeholders in the Application Process</p> <p>By proposing to eliminate a simple bright-line test, USCIS threatens to impose a heavier burden on its adjudicators, other government agencies, applicants, and those who assist them. Such an action would violate the Paperwork Reduction Act because no law or other practical consideration mitigates in favor of the change. It has never been more imperative that USCIS avoid needlessly complicating application processing. Backlogs of pending applications and wait times for adjudication have increased between FY16 and FY19, frustrating millions of American families and businesses, and their immigrant family members or employees. USCIS can ill afford to further delay its operations at this challenging time. U.S.CLS will waste resources in duplicative efforts if it adopts the proposal. Receipt of a means-tested benefit is the only current method for establishing eligibility that involves a yes-or-no determination that administrators can reach by reviewing a single document. No one piece of evidence—not even a tax return or certification of non-liability for taxes—will always show how an individual's income compares to federal poverty guidelines, nor the extent to which an individual is experiencing current financial hardship. For example, filings with the Internal Revenue Service (IRS) omit income not subject to taxation but relevant to fee waiver adjudication, such as Supplemental Security Income or personal gifts or inheritance.</p> <p>Applicants often need to document many factors to show financial hardship, including sources of income as well as extraordinary expenses related to illness, natural disaster, or other special circumstances. Receipt of a means-tested benefit is a straightforward, economical threshold because it takes advantage of the work local and state adjudicators have already invested in reviewing records, instead of requiring federal adjudicators to repeat it. USCIS would squander resources if it prohibited its employees from relying upon their state and local counterparts competent work, lengthening and complicating its adjudicators' task.</p> <p>The proposed change would burden government agencies other than USCIS. Many applicants receive means-tested public benefits and yet do not have to file tax returns. These people would now have to file needlessly return or request certification of non-liability for taxes from the IRS as the most likely first</p>

ID	Comment.	Commentor	Comment
1221	USCIS-2010-0008-0975	Lakshmi Sridaran South Asian Americans Leading Together (SAALT)	<p>Comment part 3: Eliminating Receipt of Benefits as Proof of Fee Waiver Eligibility Is an Extraordinary and Indefensible Proposal</p> <p>Streamlining and modernizing the immigration services application process is a laudable goal, but this proposed change contravenes it. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCIS’s proposal would make that process more complicated, expensive, and paperwork-heavy – in direct derogation of the agency’s stated intention to simplify adjudications.</p> <p>Withdrawing the simplest and unambiguous method of demonstrating fee waiver eligibility departs from the historical precedent of progress toward greater efficiency in USCIS adjudication. Efficiency is enshrined in USCIS’s mission statement, and its pursuit is reflected in such initiatives as creation of an electronic filing system, and elimination of the previous requirement to file a separate biographical information form (G-325A) with applications for adjustment of status. The current proposal will increase time and dollar costs imposed upon every entity involved in administering fee waivers, including the USCIS, the Internal Revenue Service, other government agencies - and applicants themselves. Conclusion</p> <p>We strongly urge you to maintain the current fee waiver application process and the guidelines set forth in Policy Memorandum PM-602-0011.1. We appreciate your consideration of these comments and hope that the USCIS will further streamline the application procedures while preserving robust access to naturalization and other services that increase the prosperity and well-being of communities across our country.</p> <p>Sincerely, South Asian Americans Leading Together (SAALT)</p>

ID	Comment.	Commentor	Comment
1223	USCIS-2010-0008-0739	Issa Ndiaye, West African Community Council	<p>Commpet part 3: Eliminating Receipt of Benefits as Proof of Fee Waiver Eligibility Would be Costly, Burdensome and Lead to a more Inefficient Administrative Process</p> <p>The proposed changes would not effectively accomplish the goal of streamlining and modernizing the immigration services applications. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCIS's proposal would make that process more complicated, expensive, and paperwork-heavy – in direct derogation of the agency's stated intention to simplify adjudications. Withdrawing the most simple and unambiguous method of demonstrating fee waiver eligibility departs from the historical precedent of progress toward greater efficiency in USCIS adjudication. Efficiency is enshrined in USCIS's mission statement, and its pursuit is reflected in such initiatives as creation of an electronic filing system, and elimination of the previous requirement to file a separate biographical information form (G-325A) with applications for adjustment of status. The current proposal will increase time and dollar costs imposed upon every entity involved in administering fee waivers, including the USCIS, the Internal Revenue Service, other government agencies - and applicants themselves.</p> <p>The changes would make it costly for the West African Community Council through increased use of staff time in gather documents and evidence necessary. It would also increase the printing costs. The proposed changes would create a cost-shift to applicants and organizations who are already facing financial struggles.</p> <p>This proposal also departs from the federal government's longstanding appreciation of the special benefit that naturalization confers by making our nation stronger and more prosperous. As the numbers of naturalized citizens and organizations assisting them have grown, researchers have amassed more extensive data that have sharpened our understanding of the many benefits that flow from individuals' decisions to naturalize. Increasingly, Congress and other policymakers have responded by calling on USCIS to promote naturalization, make it more accessible to eligible legal permanent residents, and encourage English-language learning and civics instruction; USCIS, in turn, has created the Office of Citizenship, administered grants, and undertaken extensive community education and mobilization to achieve these goals. It is in the best interests of all Americans and consistent with our nation's values to make naturalization and other immigration services more accessible to eligible newcomers. The agency's fee waive application proposal is inconsistent with USCIS's mission and runs counter to the goals it has otherwise pursued.</p> <p>Conclusion</p> <p>The West African Community Council appreciate your consideration of these comments and stand ready to work with USCIS to further streamline application procedures while preserving robust access to naturalization and other services that increase the prosperity and well-being of communities across our country. To that end, we strongly urge you to maintain the current fee waiver application process and the guidelines set forth in Policy Memorandum PM-602-0011.1.</p> <p>Sincerely, Issa Ndiaye Executive Director</p>

ID	Comment.	Commentor	Comment
1403	USCIS-2010-0008-1169	Adrienne Pon on behalf of the City and County of San Francisco and the San Francisco Immigrant Rights Commission	<p>Comment part 2: Additional Burdens on Applicants, Stakeholders, and Government Agencies</p> <p>Since 2013, San Francisco has worked closely with service providers, philanthropic foundations, other cities and USCIS to bring citizenship information and application assistance to eligible Legal Permanent Residents (LPRs) through the San Francisco Pathways to Citizenship Initiative. The Pathways Initiative prioritizes serving and supporting low income and vulnerable residents, and conducts annual direct outreach to over 35,000 public benefits recipients that may be eligible to naturalize through a direct mailer from our Human Services Agency. By conducting group processing workshops and combining resources, information, language assistance and time, particularly with the means-tested benefit evidence, the Pathways Initiative has reached over 1 million Bay Area residents and has helped USCIS encourage citizenship while saving the local USCIS district office time and resources to conduct outreach and education, as well as respond to individual questions.</p> <p>Over seventy percent of Pathways to Citizenship workshop participants apply for the fee waiver through the support of a public benefits verification letter as part of their citizenship application process. The average time and cost involved in assisting LPRs during the Pathways citizenship workshops has decreased significantly with the means-tested fee waiver verifications. Removing this form of evidence will increase legal costs, time and resources for the City and service providers, as well as increase questions and requests for assistance from the district USCIS office.</p> <p>Service providers from the Pathways to Citizenship Initiative estimate significant increases to time spent preparing I-912 forms. The current average time estimate with means-tested based fee waiver is around one hour. This includes time for attorneys to prepare forms, review the benefit verification letter, and for applicants to review and sign their documents. However, with the proposed change, the estimated average time to process an application on a fee waiver based on income or financial hardship, is 4-5 hours. This is largely due to the complexity and various financial documents (for example, tax returns, paystubs, Social Security statements,</p>

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1404	USCIS-2010-0008-1169	Adrienne Pon on behalf of the City and County of San Francisco and the San Francisco Immigrant Rights Commission	<p>Comment part 3: More Delays in Adjudicating Form I-912</p> <p>The experience of most service providers is that USCIS often rejects I-912 applications based on income and financial hardship, even when it seems clear from the evidence that the client is experiencing hardship and/or below the required income level. This may be due to the different types of evidence that are submitted with each I-912 based on income or hardship, unlike based on means-tested benefits where it is typically one or two familiar forms (especially when receiving federal benefits like SSI). When an I-912 is rejected, USCIS gives no indication or reason for rejection, simply that the fee has not been submitted. It may take months to process and return a rejected fee waiver, resulting in increased wait time for clients, more attorney time, and increased costs.</p>

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1471	USCIS-2010-0008-1234	Courtney Carter	<p>Comment part 2: The Proposal Will Burden All Stakeholders in the Application Process</p> <p>By proposing to eliminate a simple bright-line test, USCIS threatens to impose a heavier burden on its adjudicators, other government agencies, applicants, and those who assist them. Such an action would violate the Paperwork Reduction Act because no law or other practical consideration mitigates in favor of the change. It has never been more imperative that USCIS avoid needlessly complicating application processing. Backlogs of pending applications and wait times for adjudication have increased between FY16 and FY19, frustrating millions of American families and businesses, and their immigrant family members or employees. USCIS can ill afford to further delay its operations at this challenging time. USCIS will waste resources in duplicative efforts if it adopts the proposal. Receipt of a means-tested benefit is the only current method for establishing eligibility that involves a yes-or-no determination that administrators can reach by reviewing a single document. No one piece of evidence—not even a tax return or certification of non-liability for taxes—will always show how an individual’s income compares to federal poverty guidelines, nor the extent to which an individual is experiencing current financial hardship. For example, filings with the Internal Revenue Service (IRS) omit income not subject to taxation but relevant to fee waiver adjudication, such as Supplemental Security Income or personal gifts or inheritance.</p> <p>Applicants often need to document many factors to show financial hardship, including sources of income as well as extraordinary expenses related to illness, natural disaster, or other special circumstances. Receipt of a means-tested benefit is a straightforward, economical threshold because it takes advantage of the work local and state adjudicators have already invested in reviewing records, instead of requiring federal adjudicators to repeat it. USCIS would squander resources if it prohibited its employees from relying upon their state and local counterparts’ competent work, lengthening and complicating its adjudicators’ task.</p> <p>The proposed change would burden government agencies other than USCIS. Many applicants receive means-tested public benefits and yet do not have to file tax returns. These people would now have to file</p>

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193	USCIS-2010-0008-0342	Christina Guros	<p>I strongly oppose this rule changed proposed by Department of Homeland Security to make it more difficult to apply for a fee waiver request.</p> <p>Immigration law makes it extremely difficult for most classes of immigrants to access public benefits. Those who can obtain benefits often fall into vulnerable categories: refugees, asylees, victims of abuse, violent crimes or trafficking, and abused or neglected children. This proposal will have the biggest burden on these groups, whose ability to access public benefits is intentional because of their vulnerable status. Asking these vulnerable families to further prove their marginalized status, which requires more time and resources, is inhumane.</p> <p>For example, several of my former clients were applicants for U visas, a status granted to immigrants who have been victims of usually violent crimes in the United States and have cooperated with law enforcement to assist in the investigation of their cases. U visas are not granted when the crime does not meet a certain threshold, so my clients had been victims of vicious beatings, rape, attempted murder and more.</p> <p>One of my colleagues had a U visa client who was shot and paralyzed while working as a taxi driver. This individual was unable to work due to his injuries and became eligible for public assistance as the result of his U visa status. The reason that U visa recipients are eligible for public assistance is because they are so often in a vulnerable state as a result of the crimes perpetrated against them. He is an example of a person this policy would hurt.</p> <p>When he went to apply for his green card this client requested a fee waiver. The evidence he submitted of his low-income status was proof that he received public assistance. He had no other income to document his lack of wages. Under the proposed rule change, this person who was in a wheelchair due to violence perpetrated against him in the U.S. while he was working to earn a living, through no fault of his own, is now being further punished because he cannot continue to work to earn a living.</p> <p>Under the new rule and with only public assistance as his sustenance, he would have no proof of income to show U.S. Citizenship and Immigration Services when requesting a fee waiver. Without being able to adjust status or renew his green card, he would lose his ability to prove eligibility for public benefits in the future.</p> <p>This rule change creates a virtual underclass of individuals who will be unable to prove their lack of income in order to waive the fees for immigration benefits for which they are eligible, and therefore will become further disenfranchised through no fault of their own. For this reason and many more I strongly oppose this rule change.</p>
139	USCIS-2010-0008-0283	Emma Davies	<p>I believe that the proposed revision is dangerous because it inherently discriminates low income people. I believe that everyone should have the opportunity to achieve in America, and that paperwork or ability should not get in the way of that. Laws should not discriminate against wealth or lack thereof. There are good people who need help. They may not have financial means, but that is why they are here, to achieve The American Dream.</p> <p>Before you enact this policy, please look further into who you are excluding, and the impact of this policy.</p>

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729	USCIS-2010-0008-1004	Molly Coe, Volunteers of Legal Service	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Volunteers of Legal Service in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The mission of Volunteers of Legal Service (VOLS) is to develop projects to provide pro bono civil legal services to benefit low income people in New York City. Since 1984, VOLS has identified areas of legal need, created projects to meet these needs, and recruited and trained volunteer lawyers to provide the needed legal services. By providing pro bono legal services to people in need in our city, we strive to fulfill the highest aspirations of the legal profession. VOLS projects serve these vulnerable New York City populations: Children, the elderly poor, claimants denied unemployment insurance benefits, incarcerated mothers, and persons with HIV/AIDS. Legal services also are provided to low-income microentrepreneurs, and we conduct active outreach to the New York City legal community to encourage pro bono work by lawyers.</p> <p>The VOLS Immigration Project offers support for immigrant students to pursue higher education, and enable these young people to be legally employed. This program has been launched to empower students to succeed in college. The program is designed to: (1) identify high school students who need legal assistance to obtain, or retain, lawful immigration status; (2) recruit, train and mentor lawyers to provide legal services to students with viable immigration relief; and (3) provide “know your rights” information to students currently unable to regularize their immigration status.</p> <p>The VOLS Immigration Project works with guidance counselors, college advisers and other school staff on outreach efforts to create awareness about the challenges immigrant students face, and to build trust with students who may benefit from the project, encouraging them to seek legal assistance. VOLS screens students and</p>

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1312	USCIS-2010-0008-0802	Kathleen Kersh on behalf of Advocates for Basic Legal Equality (ABLE)	<p>Comment part 2: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. However, in ABLE's experience, these proposed changes will likely have the opposite effect: they will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The rule would make it more onerous for USCIS to process fee waiver applications, because its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The government estimates that the total number of responses for Form 1-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>If USCIS eliminates the means-tested benefit ground for requesting a fee waiver, many vulnerable applicants will be effectively foreclosed from receiving fee waivers. In my years as an attorney, I have filed hundreds of fee waiver requests for clients who receive means tested benefits and for clients whose household income is at or below 150% of the Federal Poverty Guidelines. However, an overwhelming amount of my income-based fee waiver applications have been erroneously rejected, causing substantial hardship to my clients and unnecessary depletion of ABLE's limited resources.</p> <p>For example, I submitted an 1-765 application for my client, Y.M.M., in January 2018, with Form 1-912. Y.M.M. had no tax records because she had recently arrived in the United States. I submitted a note to the ICE from her employer and</p>

ID	Comment.	Commentor	Comment
1313	USCIS-2010-0008-0802	Kathleen Kersh on behalf of Advocates for Basic Legal Equality (ABLE)	<p>Comment part 3: III. The proposed changes will place a time and resource burden on legal services providers and reduce access to legal services, especially in underresourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal services providers, such as ABLE, and limit access to immigration legal services for individuals in need. USCIS's proposed changes to the fee waiver application will undoubtedly require organizations like ABLE to devote more time to each individual client. Because ABLE has limited resources as a nonprofit organization, this will mean we will be able to serve fewer lowincome, vulnerable individuals. As ABLE is already the only provider of free legal services in western Ohio, these proposed changes will cause us to turn away more applicants, who have no ability to go elsewhere for legal assistance. Additionally, these proposed changes it will make it harder for ABLE and other legal services providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. As mentioned above, ABLE, like many non-profit immigration legal services providers, organizes clinics as the most efficient model to help eligible applicants apply for immigration benefits, particularly for naturalization. Workshops are helpful to both applicants and USCIS because they allow for a reduction in errors and minimize the fraudulent provision of immigration services.</p> <p>The proposed changes will substantially hinder ABLE's ability to assist individuals with naturalization and fee waiver applications in our clinic setting. As mentioned above, we assist the majority of our naturalization clinic attendees with fee waiver applications in addition to completing Form N-400. By making the 1-912 more complex and by reducing the acceptable documents</p>

ID	Comment.	Commentor	Comment
73	USCIS-2010-0008-0219	Larry McWaters	<p>Hello. I am Larry McWaters. I dont agree with Regulation OMB Control Number 1615-0116 issued by DHS/USCIS. I am volunteering at the WNA Citizenship Day event on Oct 27, 2018 for the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I volunteer to help at these workshops because I want to help people who want to be part of our country. Some of those people are not able to afford a lawyer. Lawyers from the American Immigration Lawyers Association volunteer their time to help prepare applications for naturalization. In the past, many of the applicants have been eligible for fee waivers based on receipt of public benefits. I am writing to oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is expensive for many people. I oppose the rule for these reasons:</p> <ol style="list-style-type: none">1.Use of public benefits to qualify for fee waiver is more efficient and the less costly mechanism for determining fee waiver. The rule creates more work for USCIS to scrutinize income and tax information due to the extra documentation required. The proposed rule will increase costs for the processing of N-400.2.The proposed rule would be an expensive and time consuming burden, specifically for the lowest income, elderly and disabled clients who are not required to file tax returns.3.The proposed rule runs counter to my belief in equal access to immigration and citizenship benefits regardless of wealth.4.Access to fee waivers will help people become citizens and will result in people that are more likely to obtain higher earning jobs, complete education, have access to more resources, pay higher taxes, and contribute to their communities.

ID	Comment.	Commentor	Comment
256	USCIS-2010-0008-0353	Keri Olson	<p>I strongly oppose the proposed fee waiver rule because the proposed rule is unnecessarily punitive and places a burden on applicants. Someone whose green card is about to expire may be unable to renew the card if their only proof of financial standing is their eligibility for public benefits. Which means if they are unable to renew, they could potentially lose their job and their legal status.</p> <p>For individuals who are not required to file taxes, whether because they do not work or earn enough to be required to, there is no clear way to establish eligibility for a fee waiver.</p> <p>This revision will add to the already huge backlog of cases to be processed. Instead, the USCIS should focus its efforts on eliminating backlogs 753,352 in the U.S. and 18,707 in Seattle rather than proposing changes that could lead to an increase in backlog. In addition, more officer time spent adjudicating complicated fee waivers means less time adjudicating the backlog of long-pending applications.</p> <p>The proposed rule will hurt our nonprofit partners whose very mission is to assist low-income immigrants. The additional time needed to find the necessary proof of income will stretch their already lean staff capacity, resources, and infrastructure.</p> <p>I urge this Administration to immediately withdraw this proposed revision to revise the Form I-912. Dont make it harder for immigrants to naturalize! Dedicate efforts to advancing policies that strengthen, rather than undermine, the ability of immigrants to support themselves and their families.</p> <p>Thank you for allowing my comment.</p>

ID	Comment.	Commentor	Comment
269	USCIS-2010-0008-0429	Rebecca Miller	<p>I oppose this proposal.</p> <p>Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p> <p>The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p> <p>I used to work as a paralegal at a legal aid office in Upstate NY. We were severely understaffed, and worked as hard as we could every day to help our indigent clients achieve stable immigration status. Once they were able to do this, their whole lives became more stable, and they were able to build lives in our community. This proposal would burden immigration legal aid providers, and create an additional barrier to an already cumbersome system.</p> <p>ID: USCIS-2010-0008-0429 Tracking Number: 1k2-96j8-ehzs Document Information Date Posted: Nov 14, 2018 Show More Details</p>
273	USCIS-2010-0008-0440	Christina Hernandez	<p>The process of applying for citizenship should be fair and open. Doing away with fee waivers creates an unfair system whereby wealthier applicants are more likely to become citizens. Furthermore, this will not make the USCIS more efficient, and will add more burden to USCIS, applicants, and the providers of legal services. There must be other, better ways to increase efficiency at USCIS.</p>

ID	Comment.	Commentor	Comment
281	USCIS-2010-0008-0445	Susan Tompkins- Hunt	I oppose this proposal. Applicants for citizenship who are receiving Public assistance are already put through a financial test, which can be used to determine harsdship and eligibility for a fee waiver. This proposed requirement would put an undue burden on families, as well as the USCIS and the legal services providers.
283	USCIS-2010-0008-0443	Karla Martinez	<p>I worked for over two years as a paralegal at an immigration law firm and in my experience, fee waivers helped many low-income families in applying for citizenship. Applying for the waiver was a process that was doable for people who are already submitting an application that is over 20 pages long and especially for people who have waited so long in order to become citizens of a country they love so much. The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect.</p> <p>Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p> <p>The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p>
295	USCIS-2010-0008-0448	Emilia Lewin- Karras	I am opposed to the proposal of basing fee waivers only on household income. The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.

ID	Comment.	Commentor	Comment
299	USCIS-2010-0008-0446	Akexandra Olins	<p>This proposed rule change makes no sense. If enacted, this would be a terrible policy for many reasons.</p> <ol style="list-style-type: none"> 1. The proposed change is a waste of tax payer money. There is no reason for USCIS to adjudicate fee wavier eligibility when it can be, and currently IS, done efficiently at the state level. Why waste tax payer dollars to do the same thing twice? That makes no sense. I don't want my tax dollars spent that way. 2. The proposed change will make USCIS wait times longer, not shorter. If agents are using their time verifying fee waiver eligibility, instead of reviewing N-400 applications, and conducting interviews, wait times will only increase. Why would we want to let that happen? Wait times are currently at historic highs. Let's not make this worse! 3. The proposed change will impose a significant burden on agencies that work with clients seeking to naturalize as they struggle to find ways to document their low-income status. These providers would rather spend our time helping clients prepare for their interviews, or completing their applications, not going on a paper chase. 4. The proposed change will create a burden for the IRS, as they as asked to weigh in on people's eligibility for the fee waiver. This makes no sense. <p>There is no rationale for making this change. None. It is bad public policy on so many levels. In sum, it is a solution in search of a problem. This policy change is unnecessary, wasteful, will promote inefficiency, and should NOT be enacted.</p>
313	USCIS-2010-0008-0481	Bethany Gamble	<p>The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p> <p>The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p>

ID	Comment.	Commentor	Comment
323	USCIS-2010-0008-0460	Victoria Sun	<p>I strongly oppose this proposed regulation. The wording of the proposed change is extremely misleading, saying that they want to "reduce the evidence required" to prove eligibility for a fee waiver by removing the ability to qualify for the fee waiver by proving receipt of a means-tested benefit. In reality, they are eliminating one of the primary bases that immigrants are eligible to qualify for the fee waiver. The burden of proof for the other two bases requires extensive evidence that is often impossible for immigrants to collect, especially for victims of battery and extreme cruelty (VAWA) and victims of crimes (U Visa) as they often do not have access to bank accounts, bills, leases, tax returns, paystubs and other requirements to prove the other two bases. This regulation directly targets vulnerable immigrants including asylees; domestic violence survivors; victims of violent crimes; and child victims of abuse, neglect, or abandonment by a parent, as these are some of the main types of cases that are currently eligible for fee waivers. Current USCIS regulations only allow applicants and recipients by dramatically increasing the financial burden to apply for the benefits they otherwise qualify for. For example, adjustment of status costs \$1,225, which is an exorbitant sum for almost all domestic violence survivors and special immigrant juveniles.</p> <p>These new regulations would also put a heavy burden on USCIS, as processing times are already very long, backlogs are getting longer, and USCIS is seriously understaffed. Reviewing the applications for means tested benefits is much faster for officers than reviewing extensive evidence of financial assets, liabilities, income, and expenses. USCIS officers do not have special training to extensively review financial documents, and often already make incorrect interpretations of commonly submitted documents such as federal income tax returns.</p> <p>I strongly believe that USCIS should NOT eliminate the ability to qualify for a fee waiver based on being a recipient for means-tested benefits. "Means-tested" means that local, state, or federal agencies have already determined that the immigrant qualifies for public benefits based on their income, and they are better qualified and equipped to assess immigrants' financial need.</p>
420	USCIS-2010-0008-0569	Ian Donohue	There has been no reason why there is a change to the fee waiver stated, just in a change of policy. Change in policy has been shown to slow down development and processing

ID	Comment.	Commentor	Comment
714	USCIS-2010-0008-0822	Jennifer Luebke	<p>As a citizen of the United States - a country of immigrants I vehemently oppose this proposal.</p> <p>The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect.</p> <p>Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p> <p>The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p> <p>What the USA should stand for: "Give us your tired, your poor, your huddled masses yearning to be free"</p>
719	USCIS-2010-0008-0990	Rebecca Reindel	<p>I strongly oppose the proposed regulation. The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p>

ID	Comment.	Commentor	Comment
840	USCIS-2010-0008-0982	Josephine Kovacs	<p>I strongly oppose the proposed rule. As a first-generation college student, law student, and American I would not be where I am without the low-income fee waiver and the opportunity it provided to my parents. America is based on diversity of race, background, and income, among so many other rich factors. Without these fee waivers we are creating a society in which citizenship is linked to class. Is that the environment we want to cultivate?</p> <p>In a legal sense, the proposed rule will also fail to increase efficiency. While I don't believe that efficiency can cancel out the moral detriments of this proposed rule, the proposed rule would not even succeed in creating significant efficiencies. In fact, the proposed rule is in danger of creating the opposite effect.</p> <p>Even if it were to create a marginal level of efficiency, efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p>
866	USCIS-2010-0008-0872	Joel Guros	<p>I am staunchly against the fee waiver rule (the proposed revision to Form I-912). I grew up in the most ethnically diverse neighborhood in the nation, and a great many of my neighbors directly benefited from fee waivers. The fee waiver rule would add an unnecessary challenge to an already burdensome process, increasing costs to low-income immigrants, with no additional benefit. It would be a far better use of time and resources to focus attention on the backlog of applicants. America is a nation of immigrants. Making it more difficult for others to follow in our footsteps is a cynical notion founded in cowardice and the antithesis of every precept our nation was founded upon.</p>

ID	Comment.	Commentor	Comment
996	USCIS-2010-0008-1090	Katherine Blair	<p>I oppose the new regulations, as I think many immigrants who do not have the means to pay the fees would, through naturalization, improve their financial status and the national economy as a whole. I think that the new regulation will overburden USCIS because that office will have to review much more documentation than is currently required, which would nullify the expected increased revenue from restricting fee waivers. The proposed restrictions will not deter people from filing. It will just create more work, clog the immigration system, and use precious resources.</p>
1133	USCIS-2010-0008-0411	Veronica Serrato, Project Citizenship	<p>Comment part 3: 11. The Notice underestimates the burden of the proposed collection of information on respondents and USCIS.</p> <p>USCIS estimates that the proposed collection of information would require 1.17 hours for each respondent. The Notice does not provide any explanation of how that estimate was calculated. In our experience, the burden will be much greater. Project Citizenship estimates that income-based fee waiver applications currently take .25 hours to fill out, on top of 1-2 hours to collect the underlying documentation. Approximately 90% of our fee waiver applicants apply using means-tested benefits. We estimate an additional 4 hours per applicant to prepare a fee waiver application based upon a single submission under the Proposed Change, and 2-3 hours per applicant for those applications that must be resubmitted. In addition, many applicants will be simply unable to complete the income-based application because they do not possess therequisite documentation, or the burden of proving low income is too great given their circumstances.</p> <p>Income-based fee waivers are onerous. Proof of low income requires a showing that the fee waiver applicant has income at or below 150 percent of the Federal Poverty Guidelines. This requires an applicant to demonstrate the monthly income for every member of his or her household, and to provide tax returns for the prior year, four weeks of pay stubs, or proof of when the applicant or household member became unemployed. Applicants may not have this information at all. For families with income so low that they are not paying taxes, proof of a prior year tax return will be impossible. Such applicants then would need to provide pay stubs — which they naturally may not have if their income is so low. Proof of when the applicant became unemployed will be more difficult for temporary or hourly workers to obtain. Collection of this information is time-consuming and may deter applicants altogether.</p> <p>The Notice estimates a total public burden of 409,650 hours and \$1,312.980. The Notice does not explain how this burden will be met by USCIS, or how it was calculated.² The Notice</p> <p>cannot provide an estimate of the time burden to USCIS, which will be significant, because</p>

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1285	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 3: The proposed rule change would cause inefficiencyand overwhelm the limited resources of applicants, advocates and USCis.</p> <p>The City recently asked New Citizen Program (NCP) service providers if and how this rule change, if implemented, would affect their work. Their responses varied somewhat, based on differences in agency size and client demographics, but all agreed that eliminating the public benefits basis of eligibility would have a significant detrimental effect on their clients, and in most cases, their organizations.</p> <p>1-912s based on income or hardship take more time to prepare.</p> <p>Eight-seven percent of new NCP participants enrolled in 2017 received public benefits, and 91 percent (516) of the 1-912s filed in 2017 were done so on behalf of clients who received public benefits. NCP agencies report that they rarely, if ever, file an income- or hardship-based 1-912 for someone who receives public benefits, since it is the most straightforward way to demonstrate fee waiver eligibility. Service providers agreed that, on average, it takes between 15 and 45 minutes to prepare an 1-912 based on a clients receipt of public benefits. In contrast, 1-912s based on income status or hardship might take upwards of two hours to complete, and many take much longer, if USCIS rejects the initial request which must then be resubmitted. Even in a best-case scenario, where the client has a properlyfiled tax return and recent pay stubs in support of an income-based request, some advocates stated that the 1-912 would take at least twice as long to prepare (between 30 and 90 minutes per 1-912). If this extra time per case is extended to the roughly 516 public benefits-based 1-912s filed by NCP agencies in 2017, this would equal approximately between 129 and 387 additional staff hours per year—a highly conservative estimate of the time burden imposed by the proposed rule change. Consider an applicant who worked throughout 2017 but stopped working in early 2018 to stay at home with a new baby and has not returned to paid employment. That client, based on her 2017 tax return, might not be eligible for a fee waiver. Even though her household size is larger, if she is unemployed at the time she applies for the fee waiver, she will have no recent pay stubs to prove her current lack of income.</p> <p>However, she may have become eligible for public benefits since leaving her job, and this would be the</p>

ID	Comment.	Commentor	Comment
1433	USCIS-2010-0008-1193	Joshua Hoyt, National Partnership for New Americans	<p>Comment part 2: The Proposed Rule is the Latest Attempt by the Trump Administration to Cut Off Access to Immigrants Who Are Eligible for Citizenship</p> <p>The proposed rule limiting access to citizenship comes as USCIS has a backlog of over 750,793 applications, as of the end of Quarter 3, Fiscal Year 2018.v The agency has barely lowered the backlog since the previous quarter, Quarter 2 of Fiscal Year 2018, when the backlog was 753,352, despite the fact that the agency received almost 30,000 less citizenship applications in the Third Quarter.vi The backlog of citizenship applications has doubled, from 367,000 in late 2015 to the current backlog of over 750,000, with the majority of this skyrocketing occurring during the current administration.vii</p> <p>The proposed rule on fee waivers will exacerbate the backlog of citizenship applications as well as the waiting time for applications, which exceeds over 20 months in some USCIS field offices. The rule will do so by requiring applicants for fee waivers to submit evidence of their income, or, alternatively, submit evidence of a financial hardship, and a connection between that hardship and their inability to pay. This will not only place a burden on applicants and member organizations of NPNA, who assist in citizenship and fee waiver applications. It will also place a burden on USCIS officials who must adjudicate these applications, which will consist of more paperwork and time, whereas officials currently only need to find the receipt of a means-tested benefit in the majority of cases.</p> <p>In addition to introducing inefficiencies into the USCIS system of processing fee waiver applications, the proposed rule would move the agency away from its mission of fairly adjudicating applications. Instead of allocating resources to address the enormous backlog of citizenship applications, among others, the rule would make it more burdensome for eligible LPRs to apply for citizenship and would extend the time required for USCIS officials to adjudicate the cases of those who apply while requesting a fee waiver. This will aggravate the issue of backlogs and waiting times, which USCIS leadership has shown itself incapable or unwilling to address up to now.</p>
106	USCIS-2010-0008-0271	Azmi Jaafar	I totally oppose this proposed change. I work in Refugee agency and the change to the USCIS fee waiver policy would significantly affect many refugees with undue burden.

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893	USCIS-2010-0008-0825	Amanda Eckhardt	At Restore in New York City, a Department of Justice-funded organization, the burden now falls on us as a non-profit. We are covering this cost. Imagine serving hundreds of immigrant victims a year who have been trafficked and the expense now that we carry to support survivors applying for immigration relief. Previously, immigrants who had been trafficked could have their fee waived. Please reconsider this rule especially for immigrant victims of crime.
905	USCIS-2010-0008-0886	Michelle Carey, The Los Angeles Center for Law and Justice	<p>Comment part 1:Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Los Angeles Center for Law and Justice (LACLJ) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>LACLJ is a non-profit organization which has been providing culturally competent free legal services to low-income residents of Los Angeles and their families for over 40 years. LACLJ's mission is to secure justice for survivors of domestic violence and sexual assault and empower them to create their own future. LACLJ's immigration work supports survivors of interpersonal violence in obtaining stability by representing them in their VAWA, U non-immigrant status, T non-immigrant status, Special Immigrant Juvenile Status, and Adjustment of Status petitions, among others. LACLJ has represented hundreds of individuals who have applied for immigration relief based on having survived domestic violence, sexual assault, human trafficking, and/or other violent crimes. LACLJ can thus speak to the extreme difficulty the proposed changes to the fee waiver eligibility criteria will bring to the particularly vulnerable segment of the immigrant community we serve, namely undocumented survivors of violence. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p>

ID	Comment.	Commentor	Comment
1078	USCIS-2010-0008-1199	Cecelia Levin, ASISTA	<p>***Comment did not past well*** Comment part 1: November 27, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Service Department of Homeland Security 20 Massachusetts Ave., NW Washington, DC 20529-2140 RE: USCIS-2010-0008, OMB Control Number 1615-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions Submitted via www.regulations.gov Dear Ms. Deshommes:</p> <p>ASISTA respectfully submits this comment to U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of a Currently Approved Collection: Requests for Fee Waivers; Exemptions” published in the Federal Register on September 28, 2018 (hereinafter “proposed revisions”). 1 These proposed revisions relate to Form 912; Request for Fee Waiver and accompanying guidance. 2</p> <p>ASISTA is a national organization dedicated to safeguarding and advancing the rights of immigrant survivors of violence. ASISTA worked with Congress to create survivor-based forms of immigration relief through the Violence Against Women Act (VAWA) and for 15 years has provided attorneys and advocates nationwide with valuable resources to help survivors access the services and status they need to achieve safety and independence. We stridently oppose these proposed revisions to the 912 fee waiver application and instructions as well as any corresponding changes to the USCIS Policy Memorandum, PM-602-0041-1. 3 While the proposed revisions will not result in a collection of fee waivers, ASISTA</p>

ID	Comment.	Commentor	Comment
1176	USCIS-2010-0008-0886	Michelle Carey, The Los Angeles Center for Law and Justice	<p>Comment part 5: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in underresourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services. With the proposed changes to the fee waiver form, it will become harder for nonprofit legal service providers to complete applications in the workshop setting. Organizations may stop providing assistance with fee waivers in the workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>As previously stated, LACLYs mission is to serve survivors of trauma, including domestic violence, sexual assault, and human trafficking, among others. We are dedicated to ensuring that those who are eligible for immigration relief have access to applying for that relief, despite whatever additional barriers they may face due to the trauma they have survived. However our resources are limited. These proposed changes will increase our workload and as a result of our resources already being significantly stretched, reduce the number of clients we are able to serve, leaving more vulnerable people at risk of returning to their abusers, reducing</p>

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1197	USCIS-2010-0008-0789	Jean Bruggeman, Freedom Network. USA	<p>Comment part 4: 3. The Proposed Revisions will Impose Additional Barriers on Providers Representing Trafficking Survivors</p> <p>The ‘any credible evidence’ standard has allowed USCIS to review and approve fee waivers for over 20 years, based on the individual circumstances of crime victim survivors and their dependents. Survivors may have some documentary evidence of their trafficking, but may have no evidence of their economic status. Additionally, they may be filing for multiple family members, and gathering documentation from family members who are not in the US is very difficult.</p> <p>The T Visa, for example, allows for certain trafficking victims to file applications for their parents, spouse, children, siblings as dependent T Visas. Adding additional filing requirements for each family member, as proposed in the revisions, will cause additional delays and burden providers and survivors, leading to longer delays in filing for immigration relief. These delays have real consequences on survivors and their families. Congress has recognized that family members often face threats of serious harm in their home countries.</p> <p>8 Adding additional filing requirements in situations that are so dangerous, when the requested documentation is so unlikely to be available, is both counter to Congressional intent and dangerous to public safety.</p> <p>Conclusion</p> <p>Ensuring equal access to the protections Congress created is crucial, especially for domestic and sexual violence survivors who may have few financial resources of their own. USCIS should not bypass Congressional intent and undermine these laws through fee waiver policy changes. Fee waivers provide an essential pathway for survivors to seek justice and safety.</p> <p>FNUA urges USCIS to withdraw the proposed revisions and to, instead, expand the types of documentary evidence accepted for establishing eligibility for a fee waiver so that survivors of domestic violence, sexual assault and human trafficking may equally access these protections. Strong, safe families lead to stronger, safer communities. Further restricting access to these protections puts both at risk.</p> <p>I can be reached at jean@freedomnetworkusa.org if you have any questions or need any further information or explanation.</p> <p>Sincerely, Jean Bruggeman Executive Director Freedom Network USA</p>

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1208	USCIS-2010-0008-0972	Irena Sullivan, Tahirih Justice Center	<p>Comment part 4: III. Contrary to Congress’ intent in enacting specific immigration remedies to help survivors escape violent perpetrators, the proposed revision inappropriately puts new barriers in survivors’ way and ultimately rewards abusers.</p> <p>Through the Violence Against Women Act (VAWA) and the Trafficking Victims Protection Act (TVPA), Congress recognized the specific need to protect immigrant survivors of gender-based violence because they are uniquely at risk of exploitation by abusers. Abusers use the threat of deportation to manipulate and control victims, leaving them with little hope of recourse. Remedies under the VAWA and TVPA are therefore critical to ensuring that they can come forward out of the shadows and pursue justice.</p> <p>Along these lines, survivors are permitted by law to submit “any credible evidence”ⁱⁱⁱ to support their claims. This flexible evidentiary standard, established by Congress, reflects the reality of the hardship survivors face in trying to escape the power and control dynamics of gender-based violence. Evidentiary restrictions, like the proposed revision to Form I-912, functionally serve as a bar to relief. It is arbitrary and ill-conceived for survivors to be able to meet the evidentiary requirements for substantive relief under the VAWA and the TVPA, but be unable to apply because they don’t meet stricter evidentiary criteria for the underlying fee waiver. Congress created humanitarian remedies to help survivors of gender-based violence get back on their feet and contribute to society. When survivors face insurmountable barriers to self-sufficiency, entire communities pay the price. We therefore urge you to abandon the proposed revision to Form I-912.</p> <p>We look forward to your detailed feedback on these comments, and please contact me at irenas@tahirih.org or 571-282-6180 for additional information.</p> <p>Respectfully, Irena Sullivan Senior Immigration Policy Counsel</p>

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1213	USCIS-2010-0008-0897	Grace Huang, Asian Pacific Institute on Gender- Based Violence	<p>III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in underresourced locations.</p> <p>6</p> <p>The proposed changes detailed above will increase the burden on victim-advocates and non-profit legal service providers, resulting in limiting access to immigration legal services for individuals in need. In addition, it will make it harder for legal service providers to help immigrants who cannot afford the fee apply for immigration benefits and naturalization. Currently, non-profit immigration legal service providers, including those in remote areas of the United States, organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for nonprofit legal service providers to complete applications in the workshop setting, possibly resulting in decreasing available legal assistance for individuals seeking fee waivers in a workshop setting. This would cut off access to legal support and immigration relief for vulnerable populations, particularly for those in remote or other hard-to-reach areas.</p> <p>Conclusion</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for survivors seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. For these reasons, the Asian Pacific</p> <p>Institute on Gender-Based Violence urges USCIS to withdraw the proposed rule.</p>

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1265	USCIS-2010-0008-1020	John Keller on behalf of the Immigrant Law Center of Minnesota	<p>Comment part 2: A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p> <p>ILCM works with thousands of immigrants every years seeking protection under our humanitarian programs such as DACA, TPS, U and T-Visas, SIJS as well as those seeking to adjust status after entering as refugees or being granted asylum. Additionally, many of our naturalization clients suffer disabilities or are past trauma survivors or are elderly. For all of these clients, successful, efficient adjudication of the fee waiver process is the key to moving their cases forward and helping to strengthen their integration and productivity in the U.S. for themselves and their families. It is common for our clients to have waited many months or even years to</p>

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1322	USCIS-2010-0008-0733	Suzanne McCormick on behalf of Immigration Center for Women and Children (ICWC)	<p>Comment Part 2: B. The proposed revisions will cause hardship for immigrant survivors of violence and service providers that support them.</p> <p>Fee waivers for ancillary-forms like work permits and waivers are important to ensure that all survivors have access to immigration protections for which they may be eligible.' We at ICWC are already seeing that immigrant survivors are feeling discouraged from accessing protections that they need to be safe and economically independent.° We have had numerous fee waiver applications rejected and have some clients who are so frustrated by their application being rejected that they view this new barrier as insurmountable. Contrary to what Congress intended", the proposed revisions will exacerbate the barriers that immigrant survivors already face when coming forward to access protection. The proposed revisions ignore the reality of the intersections of financial instability and intimate partner violence, they increase barriers for survivors and service providers, and unnecessarily eliminate means tested-benefits as criteria for fee waivers.</p>

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1436	USCIS-2010-0008-1199	Cecelia Levin, ASISTA	***Comment did not paste well*** Comment part 2: II. The Proposed Revisions Impose an Unreasonable Evidentiary Burden for Fee Waivers The proposed revisions counter decades of prior policy and practice by restricting the documentation to support a fee waiver request. While fee waiver adjudication is a distinct determination from a merits decision on a survivor's application, USCIS thwarts the will of Congress when it imposes an evidentiary standard for fee waivers that constructively blocks access to the legal protections Congress created for survivors like AWA self-petitions, visas and visas. USCIS must not, whether intentionally or not, deter immigrant victims of crimes from pursuing the relief intended by Congress.

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1485	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>Comment part 2: II. The proposed change would shift the cost of immigration services to those least able to afford them.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence would drastically reduce the total population eligible for a fee waiver, and would make it especially hard for the most vulnerable to secure the waiver. The rule change would devastate immigrants and their families who would otherwise be unable to move forward on their path to U.S. citizenship or obtain valid unexpired proof of their legal status in the U.S.</p> <p>Low-income applicants will have a harder time meeting the stricter evidentiary requirements proposed to prove eligibility, as further explained below. Moreover, fee waivers are particularly critical for survivors to obtain relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other serious crimes, who often need fee waivers to secure the vital immigration protections Congress created in the Violence Against Women Act (VAWA) and Trafficking Victims Protection Act (TVPA). Fleeing from abusive situations, survivors often do not have resources to pay for fee-based ancillary forms nor have primary documentation (e.g., tax transcripts, bank account statements, etc.) to demonstrate their economic need. Abusers commonly prevent survivors from accessing or acquiring financial resources in order to maintain power and control in the relationship.</p>

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4	USCIS-2010-0008-0145	Jory Charles	INSTEAD OF ELIMINATING PETITIONERS' ABILITY TO APPLY FOR A FEE WAIVER BASED ON THE MEANS-TESTED BASIS, USCIS SHOULD OFFER AN ALTERNATIVE OF ALLOWING PEOPLE WHO RECEIVES MEANS TESTED BENEFITS TO BE ABLE TO FILE AN APPLICATION AT A REDUCED FEE, SIMILAR TO THE OPTION THAT EXISTS FOR CERTAIN PEOPLE WHO ARE FILING FOR NATURALIZATION. THERE ARE 3 OPTIONS NOT 2, ON THE USCIS WEBSITE WHICH ALLOW PEOPLE TO FILE AN I-942 APPLICATION TO REDUCE THE FEE FOR NATURALIZATION, BUT THAT OPTION DOES NOT EXIST FOR OTHER APPLICATIONS THAT ARE COVERED BY ALL OF THE APPLICATIONS THAT THE I-912 IS ACCEPTED IN RELATION TO. ALLOWING CUSTOMERS TO PAY REDUCED FEES IF PROOF OF RECEIPT OF MEANS TESTED BENEFIT TO A HOUSEHOLD OR THE PETITIONER/APPLICANT WOULD POTENTIALLY INCREASE USCIS REVENUE BECAUSE THE PEOPLE WHO CANNOT AFFORD THE EVER INCREASING USCIS FEES WHO ARE FACED WITH THE INABILITY TO PAY THE CURRENT FEES WOULD LIKELY BE ABLE TO PAY A REDUCED FEE WHICH WOULD INCREASE THE POOL OF PEOPLE WHO ARE ABLE TO APPLY FOR USCIS BENEFITS AND THUS ARE ABLE TO PAY THE USCIS FEES.
797	USCIS-2010-0008-1124	David Dong	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1096	USCIS-2010-0008-1215	Teshome Taye	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment

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581	USCIS-2010-0008-0726	Shubha Balasubramanyam	I oppose this proposed regulation and strongly encourage the government to withdraw the regulation. These fees are meant to help support the government in doing it's job, they are not meant to be a barrier to people who have met the requirements from seeking changes to their immigration status. All people who meet the requirements should be able to have a change to their status, and we should set the fee scale in a way so that that is possible. This is completely counter to how America treats hard-working immigrants who are seeking positive changes to their lives and ways to continue to contribute positively to this country.
416	USCIS-2010-0008-0547	Carolina Velasco	I oppose the proposed changes in the fee waiver due to I am currently unemployed and still in ESL class.
1130	USCIS-2010-0008-0343	Mass Mail Campaign 1: Comment Submitted by Faridah Bahume, Church World Service (CWS), Total as of 11/13/2018: 7	<p>Comment part 6: Proving Financial Hardship is Nearly Impossible and Likely to Only Occur in Rare and Limited Cases</p> <p>According to Chapter 10.9 of the AFM, in order to demonstrate financial hardship, an applicant should provide documentation evidencing extraordinary expenses or circumstances affecting their financial situation, including a catastrophic illness or a medical emergency. The applicant must also demonstrate that they have suffered sufficient financial impact as a result of this hardship. Under this standard, the burden of proving financial hardship seems nearly impossible to meet, which makes the ability to demonstrate financial hardship very rare and limited.</p>

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1188	USCIS-2010-0008-0998	Julie Pasch, Houston Immigration Legal Services Collaborative	<p>Comment part 3: Fee Waivers Based on Financial Hardship Are Not Practicable for All Qualified Applicants</p> <p>Though applicants for fee waivers do have an opportunity to qualify through another means, by demonstrating "financial hardship including, but not limited to, medical expenses of family members, unemployment, eviction, and homelessness," this option will not be available to large numbers of applicants for various reasons.</p> <p>First, HILSC staff members' experiences with requesting fee waivers based on financial hardship for eligible clients indicates that these waivers are very rarely granted, even in situations with extreme and/or well-documented financial hardship. In practice, attorneys know that given the difficulties of getting these fee waivers approved, there are currently only two methods of obtaining a fee waiver; the elimination of the means-tested benefit option will, for all practical purposes, limit this to one.</p> <p>Second, it is often difficult for low-income immigrants to document expenses and liabilities. This is especially true for victims of domestic violence, who may not have access to household financial information as part of the control exerted by their abusers, or for immigrants who are already in the United States but do not have lawful status (and thus their names are not on many of the household's official documents) such as U visa applicants.</p> <p>This difficulty obtaining documents for Houston-area immigrants has been exacerbated by Hurricane Harvey. Harvey hit Houston in August 2017 and caused catastrophic levels of damage. Many low-income families in Houston have not recovered from the destruction wrought by the hurricane. A study released in August 2018 found that nearly a quarter of those surveyed were in a worse financial situation than they were before the hurricane, and forty percent of respondents were not getting the help they needed to rebuild their lives.¹³ Fee waiver applicants may not have access to documentation to demonstrate financial hardship that was destroyed in the storm. Many are in unstable living situations where their names may not be listed on the household's official documents, making it all but impossible for them to apply for a fee waiver with evidence of extreme financial hardship. In addition, their 2017 income taxes will not reflect their current financial</p>

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1249	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 3: CAST has identified proposed changes that reflect the explicit recognition of this special evidentiary requirements for victims in the Form I-912 and Instructions to Form I-912 below:</p> <p>Form I-912, Request for Fee Waiver, Part 1. Basis for Your Request [Page1]</p> <p>Current Language:</p> <p>Select at least one basis or more for which you may qualify and provide supporting documentation for any basis you select. You only need to qualify and provide documentation for one basis for U.S. Citizenship and Immigration Services (USCIS) to grant your fee waiver. If you choose, you may select more than one basis; you must provide supporting documentation for each basis you want considered</p> <p>Recommended Language:</p> <p>Select at least one basis or more for which you may qualify and provide supporting documentation for any basis you select. You only need to qualify and provide documentation for one basis for U.S. Citizenship and Immigration Services (USCIS) to grant your fee waiver. If you choose, you may select more than one basis; you must provide supporting documentation for each basis you want considered. For applicant's applying for survivor-based humanitarian relief (including but not limited to VAWA self-petition, U or T nonimmigrant status, or Temporary Protected Status), a fee waiver can be approved in the absence of additional evidence provided that the applicant's request is sufficiently detailed to substantiate his or her inability to pay the fee.</p>

ID	Comment.	Commentor	Comment
1252	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 6: Instructions for Form I-912, Request for Fee Waiver, What is the Purpose of Form I-912 [Page 1]</p> <p>Current Language:</p> <p>Form I-912 is used to request a fee waiver for eligible immigration benefit applications and petitions. You may request a fee waiver if your documented annual household income is at or below 150 percent of the Federal Poverty Guidelines (FPG) or if you can demonstrate financial hardship including, but not limited to, medical expenses of family members, unemployment, eviction, and homelessness.</p> <p>...</p> <p>To request a fee waiver, you must submit Form I-912 and provide the supporting documentation. A letter stating you are unable to pay the filing fees or biometric services fees will not be accepted without a completed Form I-912 and supporting documentation. Recommended Language:</p> <p>Form I-912 is used to request a fee waiver for eligible immigration benefit applications and petitions. You may request a fee waiver if your documented annual household income is at or below 150 percent of the Federal Poverty Guidelines (FPG) or if you can demonstrate financial hardship including, but not limited to, medical expenses of family members, unemployment, eviction, and homelessness and other information of economic abuse or victimization.</p> <p>...</p> <p>To request a fee waiver, you must submit Form I-912 and provide the supporting documentation. A letter stating you are unable to pay the filing fees or biometric services fees will not be accepted without a completed Form I-912 and supporting documentation. A fee waiver can be approved in the absence of additional evidence provided that the applicant's request is sufficiently detailed to substantiate his or her inability to pay the fee.</p>

ID	Comment.	Commentor	Comment
1287	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 5: I-912s based on income status or hardship are more likely to be rejected by Lisa% requiring additional time from service providers and MOS, adjudicators.</p> <p>The City asked NCP service providers the following: "For the I-912s based on income or financial hardship, were they accepted by USCIS the first time? If not, how many times did you have to refile? How much time did it take to refile?" Several service providers responded that these requests were rejected more often, and required them to refile, sometimes multiple times, before USC1S would accept them. Each time it was necessary to refile, the agency expended significant time (on average, over an hour) to contact the client, gather additional documentation and prepare a new 1-912. NCC clinics often experience applicants returning to clinics with their denied fee waiver requests but without an understanding of what additional information they need. Clinic volunteers must inform these applicants what documents are needed and how to obtain them, then refer these applicants to yet another future clinic or to one-on-one services.</p> <p>Fee waiver rejections also discourage and induce fear in applicants, which takes more service provider time to address. Applicants who receive a fee waiver rejection from USC1S often believe it is a denial of their entire application for naturalization. Service providers must take time to explain that it is possible to refile the fee waiver request and that this will not negatively impact their naturalization process, aside from the additional wait time in processing. Some applicants believe that USC1S will view their applications negatively because they are requesting a fee waiver, and the fee waiver rejection is further evidence for them that requesting a waiver is bad for their chances of naturalizing. This outcome is even more common with applicants from NCC clinics who do not always inform service providers of their fee waiver rejection.</p> <p>As the vast majority of NCP clients receive public benefits, NCP service providers rarely file fee waiver requests based on income or hardship. In general, individuals who do not earn enough to file taxes are eligible for, and usually receive, public benefits, so hardship-based waivers are rarely the only option. Many NCP agencies do not file hardship-based I-912s, as they are too time-consuming to prepare, and based on experience unlikely to be approved. "Filing based on financial hardship takes a long time to prepare, and it's generally more likely to be rejected."</p>

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1216	USCIS-2010-0008-1004	Molly Coe, Volunteers of Legal Service	<p>Comment part 4:II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies. USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>In our experience, fee waivers that include proof of income through affidavits, pay stubs, or other means are more likely to be rejected, sometimes in error. This causes an additional burden on the agency to mail the application back to us and then re-process a re-submitted application. Proof of receipt of a benefit by a local government agency is a straight-forward and reliable method of establishing a client's limited disposable income and therefore eligibility a waiver of immigration application fees.</p>

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557	USCIS-2010-0008-0723	Issa Ndiaye, The West African Community Council (WACC)	<p>Comment part 1:</p> <p>Dear Ms. Deshommes:</p> <p>We, at the West African Community Council, write to oppose changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests – as well as applicants, and the organizations that assist them. The West African Community Council aim to provide low-cost immigration services to the West African Community of Seattle and greater community. Many of our clients are those that would have extreme difficulty completing this additional</p> <p>Many West Africans believe in giving back and working for and with the community they are in. The additional cost of paying for Citizenship would make them choose between paying for necessary living expenses and improving their immigration status.</p> <p>Naturalization Will Benefit All Americans</p> <p>Our entire advocate for this because we believe it is the right and responsible action to do in order to live in a more fair, diverse, and just society. Many of the people that we have served and who are a part of our community have gone on to establish better careers, economic advancement, and have given back as the United States as citizens. The Executive Director of our Organization himself, was an immigration who became a citizen, worked for the federal government and subsequently co-founded our non-profit. community and all of its residents depend upon USCIS to administer benefits fairly and efficiently. When the USCIS fulfills this important component of its mission, it helps our families, employers, and civic institutions thrive by ensuring that U.S. citizenship is open to all</p>

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665	USCIS-2010-0008-0906	Rebecca Schaeffer, Church World Service	<p>Comment part 2: The Proposal Is Unjustified</p> <p>No law or other relevant factor requires USCIS to change the process for requesting a fee waiver using Form 1-912. To the contrary, experience demonstrates that disallowing receipt of means-tested benefits such as Supplemental Security Income will harm not just stakeholders in the immigration benefit adjudication process, but all Americans.</p> <p>USCIS has presented no evidence of erroneous approvals under the current procedure. Regulations at 8 CFR § 103.7(c) direct USCIS to award fee waivers to applicants who satisfy two criteria: 1) inability to pay the assigned fee, and 2) application for a benefit that does not require people to prove ability to support themselves. Any proposed change to this process should respond to some deficiency in the agency's ability to determine whether applicants can pay fees, and whether waiving a fee contravenes Congress's intent that recipients be self-sufficient.</p> <p>However, USCIS does not say that it has made even one incorrect determination of ability to pay based on means-tested benefits, let alone the substantial number that would warrant a remedy. The agency has therefore not demonstrated any defects that the proposal would cure. The lack of logical connection between the proposed change and the law governing issuance of fee waivers leaves this proposal without competent justification.</p> <p>USCIS has presented no evidence of problems in adjudication. Current regulations do not impose standard income limits on successful fee waiver applicants, and for good reason. Their ability to pay depends upon their unique and often time-sensitive circumstances, not on income below a certain threshold. For example, an annual salary of \$30,000 may enable a single, healthy young person who lives alone to pay an application fee, but may not suffice for a single person who supports several relatives or who lost her home and possessions in a recent natural disaster. To show that s/he cannot afford a fee, an applicant can demonstrate EITHER receipt of a means-tested benefit OR income below 150% of federal poverty guidelines OR financial hardship; any one proves lack of disposable income. USCIS suggests that states grant of means-tested benefits to people with varying incomes frustrates its adjudication, but that is not a problem. It has always been, and remains true that people</p>

ID	Comment.	Commentor	Comment
1425	USCIS-2010-0008-1186	Leah Martin, Hand in Hand	<p>Comment part 3: This proposal will be burdensome for applicants and service providers. The income documentation USCIS proposes will create an unnecessary barrier for eligible people to clear in order to have their fee waivers approved:</p> <ul style="list-style-type: none">● For people who have not filed tax returns, the regulation requires applicants to get a “verification of non-filing” from the IRS. However, this document doesn’t show income, or prove the person wasn’t required to file. All it does is verify the person didn’t file taxes. Further, it is only available after June 15 for the tax year, which will severely restrict when an applicant could file for naturalization.● Second, filings with the Internal Revenue Service (IRS) omit income not subject to taxation but relevant to fee waiver adjudication, such as Supplemental Security Income or personal gifts or inheritance.● In addition, if someone filed taxes for the last year, but they have since become unemployed, the proposed regulation directs them to submit either a 1099 for the unemployment money they received, or if they are NOT receiving unemployment, a letter of termination from their employer. Not only is this time-consuming, it doesn’t provide any useful information about the person’s income or inability to pay.● Finally, the proposed regulations state:<ul style="list-style-type: none">○ “If you do not have any income, or cannot provide proof of your income, describe your particular situation in detail in Part 3., Item Number 9. [hardship section] and submit a Verification of Non-filing from the IRS.Also, submit affidavits from religious institutions, non-profits, or community-based organizations verifying that the applicant is currently receiving some benefit or support from that entity and attesting to the applicant’s financial situation.”

ID	Comment.	Commentor	Comment
480	USCIS-2010-0008-0653	Schuyler Geery- Zink, Nebraska Appleseed	<p>Dear Chief Deshommes,</p> <p>Nebraska Appleseed Center for Law in the Public Interest is a nonprofit, nonpartisan law and policy organization dedicated to justice and opportunity for all Nebraskans. We work closely with communities across our state affected by immigration and economic policies. We are writing to express our strong opposition to the proposed rule which would impose barriers on working class immigrant families to receive fee waivers through I-912 forms for applications and certifications. Fee waivers are critical for struggling and working-class immigrant families. The cost of applications and certifications is exceptionally high, and in accordance with our nation’s values, working-class immigrants deserve the same access to citizenship as wealthier immigrants.</p> <p>Naturalization is a gateway to opportunity, often leading to higher paying jobs and education. Upon naturalization individual annual earnings increase by an average of 8.9% (or \$3,200) and homeownership increases 6.3%. Consequently, naturalization also enhances tax revenue and the overall economy. However, 8.8 million immigrants who are eligible to naturalize have not done so yet - less than 10% of those eligible naturalize per year.¹ Major barriers exist to naturalization. Government should make the naturalization process more cost efficient for working class families rather than cost prohibitive.</p> <p>Individuals who would not otherwise qualify under the poverty-guideline threshold and financial hardship criteria but who qualify under their state’s income level guidelines should continue to be granted fee waivers. The proposed rule change would end that policy. Different states have substantially different costs and standards of living: incomes, taxes, property valuations and rent, transportation, and available benefits. The federal government measures poverty by an outdated standard developed in the 1960s. “Research suggests that, on average, families need an income of about twice the federal poverty threshold to meet their basic needs.” ²</p> <p>Many U.S. cities rank among the highest cost of living in the world, including Washington D.C., and cities located in New York, California, Washington, and New Jersey. Significantly, these</p>

ID	Comment.	Commentor	Comment
672	USCIS-2010-0008-0770	Diane Narasaki (for ACRS)	<p>Comment part 1: November 26, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>ACRS submits this letter to document our opposition to changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests – as well as applicants, and the organizations that assist them. Founded in 1973, and located in Seattle, Washington, Asian Counseling and Referral Service (ACRS) has served the Asian and Pacific Islander (API) community in King County through multiple programs that provide culturally and linguistically competent care and services. Over 35,000 people sought our services, support, and community programs last year. Also last year, we helped over 700 community members from 25 different counties file their N-400 applications to become U.S. Citizens. ACRS is the largest naturalization services provider in Washington State.</p> <p>Naturalization Benefits All Americans</p> <p>Seattle, the surrounding communities, and all of its residents depend upon USCIS to administer benefits fairly and efficiently. When the USCIS fulfills this important component of its mission, it helps our families, employers, and civic institutions thrive by ensuring that U.S. citizenship is open to all people who qualify under the law. The agency also honors our nation’s values when it recognizes that U.S. citizens and our communities benefit greatly from immigrants’ contributions, and access to visas, work permits, and naturalization. ACRS is located in the heart of Washington’s diverse King County. The U.S. Census’ 2015 American Community Survey estimates that 22% of King County’s population (or 459,000 residents) is foreign-born. Over 51% of these have not naturalized. Approximately 27% of foreign-born residents speaks a language other than English at home; and 10% speak English less than “very well.” According to the Center for the Study of Immigrant Integration, there are 182,684 LPRs eligible to naturalize in Washington State, of which 74,982 are in King County. Seattle naturalization service providers are able to help a few thousand of these eligible LPRs to naturalize each year. It is our strong belief that it benefits all Americans when it is as easy and efficient as possible for these individuals to</p>

ID	Comment.	Commentor	Comment
1296	USCIS-2010-0008-1001	Kevin Herrera, The Sargent Shriver National Center on Poverty Law ("the Shriver Center")	<p>Comment part 3: III. The Proposed Change Will Result in Financial Hardship for Applicants</p> <p>For applicants barred from fee waivers under the proposed rule who somehow find a way to pay the full fee for an application, the financial repercussions of an unaffordable expense will be severe. For a family of four living at 175 percent of the Federal Poverty Limit, eligible for public benefits like SNAP and CHIP but required to pay full fees under the proposed rule, an application for a replacement permanent resident card would cost nearly 15 percent of monthly income.¹² This is income needed for basic necessities like food, shelter, and health care. The inevitable financial tradeoffs created by fees a family cannot afford will have dramatic impacts on the wellbeing of families whose financial needs are evidenced by eligibility for and receipt of means-tested benefits. Studies show that "financial shocks," or necessary expenses that an individual cannot afford, can have devastating consequences for low-income families, including for people above the 150 percent of the FPL threshold proposed by the rule. For example, 50% of families who rent their home and have income under 200 percent of the poverty line report low confidence in their ability to cover an unexpected expense of \$400,¹³ an amount at the low end of application fee costs. Especially where expenses are deemed critical by an individual or family, a quality which could foreseeably be ascribed to an immigration application, research shows that people living in or near poverty will forego other needs to try and make those payments. Multiple studies examining income volatility show financial shocks increase the likelihood of that a family will experience food insecurity, meaning that unexpected costs cause families to go hungry.¹⁴ This effect unfortunately extends beyond nutrition, as families forced to pay for needed expenses they cannot afford will skimp on medical care, utilities payments, educational costs, and other essentials so that they can cover the unexpected cost. Thus, the proposed rule will needlessly amplify the effects of poverty for people who are no longer eligible for fee waivers.</p> <p>Conclusion</p> <p>The proposed rule would not accomplish any objectives that further the purpose of USCIS and would create inefficiency and delay for the agency to design changes under the rule would also</p>

ID	Comment.	Commentor	Comment
655	USCIS-2010-0008-0977	Mary Ellen Burns, ASCJ, Apostle Immigrant Service	<p>I am the director of Apostle Immigrant Services, a nonprofit agency which provides immigration legal services to persons of limited income in the greater New Haven, CT area. I write to oppose the proposed change in the fee waiver application process, specifically, the proposal to drop receipt of a means-tested government benefit as a basis for a fee waiver.</p> <p>Our agency represents many immigrants who are eligible for fee waivers, and the availability of the fee waiver makes it possible for them to access immigration benefits. The use of a government agency eligibility determination for a means-tested benefit is the most efficient way to establish fee waiver eligibility. The agencies, such as the Connecticut Department of Social Services, that make eligibility determinations for programs such as SNAP (food stamps) and Medicaid are experts in that process. It is inefficient to require USCIS officers to reinvent the wheel, recalculating the applicant's income. (I also note that many government benefits have both income and asset limits, making them actually more restrictive than USCIS's fee waiver standard.) This inefficiency will inevitably result in increasing the cost of the benefit application process, a cost which must be recovered through application fees, and will therefore make it even more difficult for immigrants of modest means to access these vital applications.</p> <p>In addition to creating inefficiencies - and therefore increasing costs - for USCIS, the proposed rule would also be more burdensome for agencies such as ours, that provide services for low-income immigrants. Evaluation and development of documentation to establish household income is a time-consuming process. Some clients, particularly those applying for work authorization (for example, based on the Cuban Adjustment Act or deferred action for U status applicants), have sporadic and informal sources of income that are difficult to document. The requirement that they prove their income will inevitably reduce the number of clients we are able to help and will undercut the policy of both DHS and the Department of Justice, to encourage the provision of immigration legal services by attorneys and DOJ-recognized agencies.</p> <p>The use of receipt of means-tested benefits also ameliorates the unintended burden of a current one-size-fits-all Federal Poverty Level standard. Connecticut is a state with a relatively high cost of living, particularly for housing. Some regional variations in the cost of living are reflected in the eligibility guidelines for means-tested benefits, particularly SNAP, making them a more just standard for the granting of fee waivers.</p> <p>Standards for means-tested benefits are generally stringent and the agencies that run the programs are strict in their evaluation of applicant eligibility. If DHS has concerns that the current definition of "means-tested benefit" is too broad, it should craft the definition more carefully, not reject this fee waiver basis in its entirety.</p>

ID	Comment.	Commentor	Comment
1251	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 5: Form I-912, Request for Fee Waiver, Part 4. Financial Hardship [Page4]</p> <p>Current Language:</p> <p>If you or any family members have a situation that has caused you to incur expenses, debts, or loss of income, describe the situation in the box below. Specify the amounts of the expenses, debts, and income loss in as much detail as possible. Examples may include medical expenses, job loss, evictions, and homelessness.</p> <p>Recommended Language:</p> <p>If you or any family members have a situation that has caused you to incur expenses, debts, or loss of income, describe the situation in the box below. Specify the amounts of the expenses, debts, and income loss in as much detail as possible. Examples may include medical expenses, job loss, evictions, homelessness, and other information of economic abuse or victimization. A fee waiver can be approved in the absence of additional evidence provided that the applicant's request is sufficiently detailed to substantiate his or her inability to pay the fee.</p>

ID	Comment.	Commentor	Comment
44	USCIS-2010-0008-0179	Monica Vargas Huertas	<p>As an immigrant attorney working with immigrants of multiple nationalities, backgrounds and socio-economic status, I find it of great concern, the new regulation restricting the possibility of filing I-912 (fee waivers) based on mean tested benefits. Evidence of income below 150% of the federal poverty guidelines is hard to obtain in many cases since applicants who may benefit of this have an income under the Federal Tax Filling Requirement Threshold, and thus, do not file tax returns. They will lack the evidence to submit this request and will initially deter applicants from filing the required applications before the USCIS.</p> <p>However, forcing applicants to submit evidence through IRS tax filing, eventually will translate in an over-saturation of unnecessary tax filing requests and the subsequent increase in the amount of tax return moneys that low income tax payers are eligible to obtain. Therefore, any additional income received by the DHS will be uncompensated by the increase in tax returns paid out to people who would otherwise not file.</p>

ID	Comment.	Commentor	Comment
80	USCIS-2010-0008-0226	Un Kim	<p>My name is Un Kim. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS. My family immigrated from Korea in the early eighties and though we did not require this particular waiver then, I understand the huge ramifications this can have on struggling families trying to access their path to citizenship. As a current citizen and teacher of civics, I hold firmly to the value that this nation should be encouraging and supporting access to citizenship, not denying it based on income.</p> <p>The test for the fee waiver is ability to pay. A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay. States and localities have already done a needs based test. USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed.</p> <p>The rule does not save the taxpayers any money. The rule creates more work for USCIS to scrutinize income and tax information due to the extra documentation required. This in turn will increase already long processing times to decide N-400s</p> <p>This would be an expensive and time consuming burden, especially on the lowest income, elderly and disabled clients who are not required to file tax returns.</p> <p>People who receive public benefits and later file for naturalization and become US citizens are more likely to obtain higher earning jobs, complete education, have access to more resources, pay higher taxes, and contribute to their communities. This was certainly the case for me and my family who for a brief time received public aid via food stamps, and now my siblings and I serve our communities as a high school teacher, electrical engineer, and GI doctor.</p> <p>We should not penalize permanent residents who have received public benefits that they are entitled to receive. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply. Our citizenship is what allowed myself and my siblings to obtain college educations. We are better off for it and our communities are better off because of our contributions as well.</p>

ID	Comment.	Commentor	Comment
81	USCIS-2010-0008-0248	Caitlin Wasley	I work with many immigrants, and I am concerned about removing the state benefits qualification for fee waivers as well as some of the other proposed changes. If an immigrant is low income, they may not need to file a tax return, so they will not be able to use a tax return as proof of financial hardship. States have already done the work to prove need for folks receiving benefits, so why do the same work twice? Also, having to prove need through other means will also be a time burden on legal services providers as theyll need to spend more time with each client. I also live in Seattle which has a high cost or living, so Im concerned that using the federal poverty guideline as the standard will negatively affect immigrants in areas such as Seattle with a high cost of living. Thanks for your careful consideration.
91	USCIS-2010-0008-0239	Katie Stoppler	This proposed policy disregards the fact that costs of living vary from state to state. Agencies have already done the work to ensure those receiving public benefits do qualify for them based their current situation by looking at family size and current gross income.
159	USCIS-2010-0008-0304	Leah Falk	My name is Leah Falk. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. The proposed revision, which would limit the evidence required for the fee waiver to only a person's household income, does a disservice to households where income is not the most reliable indicator of their ability to afford fees. Further, the same income level in different states may reflect drastically varying capacities to pay required fees.




ID	Comment.	Commentor	Comment
168	USCIS-2010-0008-0305	Danielle Michaels	<p>I, too, am writing to voice my opinion against Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008.</p> <p>This proposed change does not take into account what a cost of living means in various parts of the country. As others have mentioned before me, adding to the cost of proving income is simply another hoop an already-marginalized individual shouldn't be subjected to.</p> <p>We should be making it easier for individuals to avoid regulations that exist solely to oppress them, rather than add to the list. As an American citizen who couldn't afford these proposed fees, I can't imagine asking individuals who are struggling even more than I am to be subjected to this.</p> <p>Thank you for taking these comments into consideration when making your decision.</p>

ID	Comment.	Commentor	Comment
226	USCIS-2010-0008-0399	Ellen Garvey	<p>I am writing to object to the Department of Homeland Securitys proposed revision of a currently approved collection of information, OMB Control Number 1615-0116, Docket ID USCIS-2010-0008.</p> <p>Immigrants have much paperwork to fill out to stay in this country, and are charged for many types of applications. Around twenty-five applications require immigrants to pay fees in order to have their petitions considered. Those who are very poor currently qualify for fee waivers, and can use as evidence means-tested benefits they receive. With the proposed change, applicants would need to show that their household incomes are below 150% of the federal poverty line. But in some states, the cost of living is so high that people living just below 200% of federal poverty line are poor and cannot afford the fees. Some states recognize this by giving aid to people with higher incomes.</p> <p>This is why continuing to measure eligibility for fee waivers based on whether they qualify for government benefits is the fair thing to do. If the DHS ignores these disparities, they place immigrants filing papers under stress and in jeopardy. The notion that standardizing the means test makes the situation more even is Procrustean. Immigrants deserve a fair chance.</p> <p>ID: USCIS-2010-0008-0399 Tracking Number: 1k2-96i3-cscg Document Information Date Posted: Nov 13, 2018 Show More Details</p>
280	USCIS-2010-0008-0435	Paula Forero	The government's argument that states have various levels of income for public guidelines is arbitrary. The government did not provide a table showing income across the 50 states and Washington, DC. We do not know what the range is in each state. Therefore we cannot ascertain whether this comment is correct.
983	USCIS-2010-0008-1071	Michael James	Repeal this rule change! The prices do not match the average income of an immigrant household! PLEASE do not let this go throug
1042	USCIS-2010-0008-1160	Alma Garcia	Stop attacking low income fee waiver. Not everyone can afford cost of living is high and everything is so expensive.

ID	Comment.	Commentor	Comment
1399	USCIS-2010-0008-1152	Hieu Nguyen, Korean Women's Association	<p>Comment part 4: A national income standard does not account for huge disparities in cost of living and minimum wage in different localities. A municipality like Seattle, recently adopted a minimum wage of \$15/hour to account for increases in the cost of transit, food and housing, which have risen exponentially in recent years. By contrast, many other areas of the country have lower minimum wages and lower costs of living. For example, in Val Verde County, Texas, the median family income is \$51,600 - less than half of the median family income of \$103,400 in King County, Washington¹. USCIS proposal appears to require people in areas with higher costs of living and higher minimum wages, like Seattle, to submit fee waivers on the basis of financial hardship, whereas someone in Val Verde County would qualify on the basis of income within 150% of the federal poverty guidelines.</p> <p>In conclusion, we urge you to take back this rule and preserve existing methods of proving eligibility for the fee waiver. This new policy on fee waivers will further burden the 8.8 million lawful permanent residents (LPRs) who are eligible for citizenship, the vast majority of whom do not apply due to various barriers, including cost.² In calendar year 2017, almost 40% of the 926,260 immigrants who applied for citizenship applied using the fee waiver.¹ The proposed regulation, if in effect, would have the high likelihood of deterring more than 300,000 fee waiver applicants, and, thus, a substantial amount of citizenship applicants in total.</p> <p>This deterrent effect would also block individuals, as well as entire communities, from the benefits associated with naturalization. Naturalized citizens earn 8-11 percent more in wages (an average of approximately \$2,200 per year) compared to eligible LPRs who don't naturalize. Naturalizing has been shown to double someone's likelihood of owning a home, and by doing so, strengthen their local housing market and tax base.¹ Nationally, if 1.5 million LPRs naturalized every year over the next five years, the GDP would increase by \$37-52 billion over the ten years.¹</p> <p>Hieu Nguyen Social Service Senior Manager KOREAN WOMEN'S ASSOCIATION</p>

ID	Comment.	Commentor	Comment
1426	USCIS-2010-0008-1186	Leah Martin, Hand in Hand	<p>Comment part 4: A national income standard does not account for huge disparities in cost of living and minimum wage in different localities. A municipality like Seattle, recently adopted a minimum wage of \$15/hour to account for increases in the cost of transit, food and housing, which have risen exponentially in recent years. By contrast, many other areas of the country have lower minimum wages and lower costs of living. For example, in Val Verde County, Texas, the median family income is \$51,600 - less than half of the median family income of \$103,400 in King County, Washington . USCIS' 1 proposal appears to require people in areas with higher costs of living and higher minimum wages, like Seattle, to submit fee waivers on the basis of financial hardship, whereas someone in Val Verde County would qualify on the basis of income within 150% of the federal poverty guidelines.</p> <p>In conclusion, we urge you to take back this rule and preserve existing methods of proving eligibility for the fee waiver. This new policy on fee waivers will further burden the 8.8 million lawful permanent residents (LPRs) who are eligible for citizenship, the vast majority of whom do not apply due to various barriers, including cost. In calendar year 2017, almost 40% of the 926,260 immigrants who applied for 2 citizenship applied using the fee waiver. The proposed regulation, if in effect, would 3 have the high likelihood of deterring more than 300,000 fee waiver applicants, and, thus, a substantial amount of citizenship applicants in total.</p> <p>This deterrent effect would also block individuals, as well as entire communities, from the benefits associated with naturalization. Naturalized citizens earn 8-11 percent more in ages (an average of approximately \$2,200 per year) compared to eligible LPRs who don't naturalize. Naturalizing has been shown to double someone's likelihood of owning a home, and by doing so, strengthen their local housing market and tax base. Nationally, if 1.5 million LPRs naturalized every year over the next five 4 years, the GDP would increase by \$27.52 billion over the ten years.</p>
373	USCIS-2010-0008-0527	Wendy Hernandez	<p>This regulation increases USCIS adjudication time - a serious waste of resources. Why would you want to re-do what the State agencies have already done by spending time analyzing each person's income and expenses? And since expenses and income vary a great deal, depending upon the cost of living in the community, USCIS officers will find themselves trying to compare apples and oranges. This appears to be another attack on our most-needed workers - those who make minimum wages in agriculture or service industries where US Citizens do not want to work. Please do not change the fee waiver guidelines. Thank you.</p>

ID	Comment.	Commentor	Comment
158	USCIS-2010-0008-0307	Juliana Roth	<p>This comment is being submitted to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008.</p> <p>We have made huge strides in our immigrant communities by helping those most further away from the ability to apply for citizenship to actually do so. I will continue to fight for immigrant communities until all of these unlawful regulations like this one no longer exists. In the next few paragraphs I will explain the reasons why I oppose the proposed rule.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people. I oppose the rule for these reasons:</p> <p>A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay. States and localities have already done a needs based test. USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed. This is an example of systemically oppressive system designed to not allow people to become immigrants.</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>I do not understand why these regulations exist to oppress immigrant communities. The burden of \$725.00 is a lot of money for families. We used to be a country that welcomed immigrants to this country and now we are a country that is ruled by hate and fear. Please do the right thing and take care of these communities.</p>

ID	Comment.	Commentor	Comment
644	USCIS-2010-0008-0791	Erik Finn	<p>November 26, 2018 Samantha L. Deshommes Chief, Regulatory Coordination Division, Office of Policy and Strategy  U.S. Citizenship and Immigration Services, Department of Homeland Security 20 Massachusetts Avenue NW  Washington, DC 20529-2140</p> <p>Re: OMB Control Number 1615-0116; United States Citizenship and Immigration Services, Docket ID USCIS-2010-0008</p> <p>Dear Ms. Deshommes,</p> <p>Thank you for the opportunity to comment on United States Citizenship and Immigration Service’s (“USCIS”) Proposed Change to Form I-912, Request for Fee Waiver (“Proposed Change”). I am writing to respectfully state my opposition to the Proposed Change. As the son of a naturalized citizen and former AmeriCorps member serving clients at a Boston-based nonprofit organization, specializing in providing legal aid to eligible legal permanent residents applying for citizenship, I am confident the Proposed Change will adversely affect applicants for naturalization, legal service providers assisting applicants, and USCIS. While I commend the stated goal of USCIS to streamline and expedite the fee waiver process, the Proposed Change would do the opposite, while unduly burdening and turning away applicants living in poverty who are entitled to a fee waiver.</p> <p> USCIS states that the Proposed Change, “would reduce the evidence required for Form I-912 to only a person's household income and no longer require proof of whether or not an individual receives a means-tested benefit.” In actuality, the Proposed Change would significantly increase the evidence required for naturalization applicants to be accepted for a fee waiver, while eliminating the accurate and effective means-tested benefit category now in effect. Currently, applicants can submit proof that they receive a means-tested benefit like SNAP (formerly food stamps) or Medicaid, to demonstrate their qualification for the fee waiver. This allows applicants to submit documentation from a benefit-awarding agency, e.g. Massachusetts Department of Transitional Assistance (DTA), showing their receipt of benefits. Since DTA has already evaluated an applicants income to be at or below 150% of the Federal Poverty Guidelines, receiving proof of benefits is as easy as requesting a verification letter from the agency. USCIS’s Proposed Change would eliminate this streamlined process, and require an applicant to gather and resubmit the same income verification documents already submitted and evaluated by benefit awarding agencies. In effect, the Proposed Change duplicates the work to be done by taxpayer-funded agencies and adds to the burden of applicants living in poverty who are entitled to the fee waiver.</p>

ID	Comment.	Commentor	Comment
926	USCIS-2010-0008-0961	Abed Ayoub, American-Arab Anti- Discrimination Committee (ADC)	<p>November 27, 2018</p> <p>Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy</p> <p>U.S. Citizenship and Immigration Services</p> <p>Department of Homeland Security</p> <p>20 Massachusetts Avenue NW</p> <p>Washington, DC 20529-2140</p> <p>Re: DHS Docket ID USCIS– 2010–0008, OMB Control Number 1615-0116</p> <p>Comments in Response to Proposed Rulemaking: Request for Fee Waiver: Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the National Network for American-Arab Anti-Discrimination Committee in response to the Department of Homeland Security’s (DHS, or the Department) Notice of Proposed Rulemaking (NPRM or proposed rule) to express our strong opposition to the changes regarding "fee waivers," published in the Federal Register on September 28, 2018. (89 Fed. Reg. 49120). The proposed rule limiting access to fee waivers would cause major harm to immigrants and their families seeking U.S. citizenship.</p> <p>The American-Arab Anti-Discrimination Committee (ADC) is a civil rights organization committed to defending the rights of people of Arab descent and promoting their rich cultural heritage. Our mission includes promoting civil rights and liberties for Arab Americans and other persons of Arab heritage, serving as a public voice for the Arab American community in the United States on domestic and organizing and mobilizing the Arab American community in furtherance of the organization’s objectives. In pursuit of this mission, we strive to foster economic, cultural, and political empowerment of Arab Americans. Toward this end, we support and encourage the naturalization of eligible immigrants. It is on this point that we direct our comments today.</p> <p>The U.S. Citizenship and Immigration Services (USCIS) is permitted by regulations to waive certain fees provided the party requesting the benefit is unable to pay the prescribed fee. Since 2011, USCIS has permitted fee waivers where an applicant received a means-tested benefit. This allowed families and individuals to use evidence of their means tested benefit to qualify for a fee waiver. (See 8 CFR 103.7(c)(3)).</p> <p>The NPRM proposed on September 28, 2018, would rescind this policy as described in Policy Memorandum, PM–602–0011.1, Fee Waiver Guidelines as Established by the Final Rule of the USCIS Fee Schedule; Revisions to Adjudicator’s Field Manual (AFM) Chapter 10.9, AFM Update AD11–26 (Mar. 13, 2011) and issue new guidance that excludes means tested benefits as a documentary basis to demonstrate need when requesting a fee waiver. The proposed revision would reduce the evidence</p>

ID	Comment.	Commentor	Comment
1128	USCIS-2010-0008-0343	Mass Mail Campaign 1: Comment Submitted by Faridah Bahume, Church World Service (CWS), Total as of 11/13/2018: 7	<p>Limiting the Fee Waiver Criteria Will Hinder Immigrants’ Ability to Become Lawful Permanent Residents, Naturalized Citizens, and Self-Sufficient</p> <p>Limiting the fee waiver to those proving household income or financial hardship will hinder low-income immigrants’ ability to become residents, naturalized citizens, and self-sufficient. USCIS data demonstrates that between 2013 and 2017, forms I-765, I-485, N-400, and I-90 accounted for most fee waiver approvals . The proposed change will significantly reduce the number of applicants eligible for a fee waiver, which will result in a reduction of applicants filing these forms.</p> <p>Under Chapter 10.9 of the Adjudicator’s Field Manual (AFM), to prove household income, an applicant needs to submit evidence of current employment or a copy of their income tax return. Under this standard, immigrants who cannot prove income including the self-employed, low income, and elderly, will be excluded from qualifying for a fee waiver. These immigrants will face challenges providing adequate proof of income, especially if they are not required to file income tax returns because their income is below the IRS required filing level. Immigrants who are elderly, disabled, or who have large families, will face hurdles in raising enough funds to pay for the high cost of a residency application (\$1,225) or the naturalization application (\$725)—especially when they are living paycheck to paycheck. These challenges discourage and delay immigrants from becoming lawful permanent residents and naturalized citizens.</p> <p>The proposed change would also hinder an immigrant’s ability to become self-sufficient. Immigrants who recently entered the United States and who file an initial form I-765 would not be able to provide evidence of employment, income tax returns, assets, or expenses due to their recent entry. Examples of these individuals include Cuban and Haitian entrants recently paroled into the U.S. filing for employment authorization under category (c)(11). Currently, these individuals are able to enroll in some benefits and immediately obtain proof of their participation. These individuals can use a benefits letter, which can be quickly obtained online or at an access center after approval, to immediately file form I-765 along with a fee waiver.</p> <p>If the receipt of means-tested benefits is removed from the fee waiver eligibility criteria, these immigrants will be less likely to obtain a fee waiver—thus hindering and delaying their ability to obtain employment. Many will have to delay filing for a work permit until they have the funds necessary to pay the \$410 filing fee. Out of the desperate need to become employed, many will resort to using the limited cash provided by their benefits (intended for living expenses) to pay for a work permit. Immigrants in this group will already be economically burdened from having to make monthly bond payments towards their bond (up to \$15,000), which is used to secure their release from immigration detention. Many will have to choose between paying for basic living necessities or paying the \$410 filing fee for a work permit that they desperately need to become self-sufficient.</p>

ID	Comment.	Commentor	Comment
1204	USCIS-2010-0008-0751	Amy Lee, Jubilee Immigration Advocates	<p>Comment part 3: The reasons given for the change are unjustified and misleading. The reasons provided in the Federal Register are misleading and do not justify the proposed changes. First, rather than reducing the evidence required for a Form 1-192, this proposal would substantially increase the proof an individual receiving means-tested benefits would need to prove his/her eligibility for a fee waiver. Whereas currently an applicant simply submits a letter or notice from the county or state human services agency verifying that s/he receives a means-tested benefit, this change would require the applicant to submit additional proof of income such as federal tax return or pay stubs, both of which some immigrants do not have or will have difficulty obtaining. Secondly, regardless of whether the means-tested benefits received by the applicant is administered at the state or local level, these benefits are intended to support individuals experiencing financial hardship. USCIS has not provided any evidence that these individuals are either receiving these benefits fraudulently or have sufficient income to afford to pay their application fees. Thirdly, limiting fee waivers to those who can prove they at 150% FPL and have financial hardship (where the documentation requirements are extremely burdensome for most low income applicants), does not account for the vast differences in the cost of living in various regions. For example, according to the U.S. Department of Housing and Urban Development, a family of four living in the San Francisco Bay Area earning \$73,300 or less is considered very low income. In San Antonio, Texas, the same family earning \$33,400 or less would be considered very low income. Using 150% FPL standard to determine fee waiver eligibility does not account for the economic disparities across the country.</p> <p>We strongly urge you to reject these proposed changes and maintain the current fee waiver rules for individuals receiving means-tested benefits.</p> <p>Executive Director & Managing Attorney</p>
401	USCIS-2010-0008-0590	Ian Donohue	<p>It is well documented that green card holders make well under the average income in the United States of America and by changing the previous ability to waive the fee for application, many would be applicants will not be able to afford the application or if they do get a chance to save to apply, the money would be better spent on housing, nutrition and education opportunities</p>
1027	USCIS-2010-0008-1138	Cris Berns	<p>Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment</p>

ID	Comment.	Commentor	Comment
432	USCIS-2010-0008-0572	Peter Costantini	<p>The proposed changes to the fee waiver process will hurt low-income families. What's more, they are completely unnecessary. There is no reason to discourage fee waivers for very expensive status changes. Instead, ways to demonstrate need should be expanded to use two-times the poverty level, and permit a broader range of ways of establishing need.</p>
517	USCIS-2010-0008-0673	Christina Guros	<p>In the current state of income inequality, high cost of living in urban centers, and stagnant wages, USCIS should be looking to expand eligibility for the fee waiver process, not reduce it.</p> <p>I work to increase the number of eligible lawful permanent residents (LPRs) applying to naturalize in the Seattle area. Through both traditional one-on-one legal assistance and volunteer-based group application assistance events known as citizenship workshops or clinics.</p> <p>For applicants at our workshops and clinics who do not receive public assistance and who are slightly over the income threshold for a fee waiver or reduced fee, or for those who are distrustful of the fee waiver process and believe their immigration cases will be negatively affected by a fee waiver filing, the number one barrier to applying to naturalize is their ability to save up for the filing fee.</p> <p>To be over 200 percent of the federal poverty guidelines a family of four must earn over \$50,200. Yet for King County, Washington, the U.S. Department of Housing and Urban Development considers families of four earning less than \$72,000 to be low-income (https://www.king5.com/article/news/local/72000-considered-low-income-in-king-snohomish-counties-for-family-of-four/281-434107397). For families earning too much to qualify for a fee waiver, the most difficult hurdle to overcome to apply for citizenship is the ability to save up for the filing fee.</p> <p>According to a rental market data analysis, the average rent for a two-bedroom apartment in Seattle is \$2,740 per month, which adds up to \$32,880 per year. (https://www.rentjungle.com/average-rent-in-seattle-rent-trends/). For a family of four earning \$55,000 per year, slightly over 200 percent of the federal poverty guidelines, the average Seattle rent would eat up 60 percent of their earnings, leaving very little room to save for immigration application fees. And at over 200 percent of the poverty line, these families are not eligible for fee waivers or fee reduction applications for immigration filing fees.</p> <p>The USCIS proposal to limit the evidence used to establish eligibility for a fee waiver is ludicrous in this current environment. In urban centers where the cost of living has greatly outpaced wages, there are thousands of families over the poverty line who are unable to pay the USCIS filing fees. Yet USCIS proposes instead to make it more difficult even for those who are under 150% of the federal poverty level to prove their eligibility. The proposed plan would make it more difficult for low-income families to prove their inability to pay, by eliminating receipt of public benefits as a way to prove low-income status. For families currently dependent upon public assistance, there will be virtually no way for them to prove their lack of income.</p> <p>Thus, the USCIS proposal to alter the fee waiver process can only be viewed as an attempt to force very low-income families to pay the filing fees despite their inability</p>

ID	Comment.	Commentor	Comment
939	USCIS-2010-0008-1009	Justin Talbott	<p>As someone who works with an immigration services legal provider, there are many things that worry me about this particular proposed rule change.</p> <p>First, it makes applying for a fee waiver a significantly more complicated and involved process. Instead of using proof of government benefits, this new rule forces both immigrants and immigration officers to go through the extra step of producing and reviewing the necessary documentation. For many immigrants who cannot work legally or do not earn enough to file taxes, this rule change could be the difference in whether or not they apply for a legal immigration benefit for which they are eligible.</p> <p>Second, this rule change is highly inefficient and would be a waste of time for those applying for fee waivers, those preparing the fee waivers, and those reviewing the fee waivers. Government benefits like Medicaid or food stamps are ALREADY MEANS TESTED and thus anyone who qualifies for them should already be eligible for a fee waiver. This proposed change makes immigration agents re-screen for eligibility when in reality, government agencies have already done that work. It is an unnecessary increase in workload to a department in USCIS that is already backlogged with applicants.</p> <p>Third, this rule change does not take into account the economic context of the individual applicant as well as it should. Applicants must show that they are below 150% of the federal poverty level to qualify for a fee waiver, but that number is FEDERAL and not LOCAL. This disproportionately affects poorer applicants who live in an area where the cost of living is much higher than in the majority of the United States. As someone who lives in the Bay Area, I know firsthand how difficult it is to make ends meet if over half of your paycheck goes to rent and other basic necessities. Local government agencies have the local knowledge to discern whether or not someone qualifies for benefits based on the environment around them, something a federal test simply cannot achieve.</p> <p>Immigration fees are not cheap, especially when you're already struggling to make ends meet for yourself or your family. The current fee waiver rules allow many of the most vulnerable applicants to apply without risking economic disaster. The proposed rule changes would eliminate a key way of applying for the fee waiver, making it more difficult -- and in some cases impossible -- for those who need the fee waiver the most to obtain it. I strongly urge you to keep the current fee waiver rules in place for the sake of these applicants.</p>

ID	Comment.	Commentor	Comment
1168	USCIS-2010-0008-0941	Kham Moua, Southeast Asia Resource Action Center	<p>Comment part 5: The Federal Poverty Standard is Insufficient for Accurately Measuring Financial Hardship</p> <p>USCIS argues that inconsistent income levels utilized by states to determine eligible for means-tested benefits results in varied incomes levels used for the determination of fee waivers.¹² However, the current federal poverty guidelines do not accurately measure the costs of living in 2018. It does not take into account regional differences in cost of living nor does it account for necessary expenses outside of food.</p> <p>States are correct in employing different income levels to determine financial need. Because current federal poverty guidelines do not sufficiently capture financial hardship, in 2008, then New York City Mayor Michael Bloomberg adopted the 1992 National Academy of Sciences' recommendations for measuring poverty. Additionally, the modern costs of living in locations such as California (home to almost one million SEAs) are substantially different than those in Oklahoma. ¹⁵</p> <p>Given that many SEAs are concentrated in major metropolitan areas, their economic status ¹⁶ may not be accurately captured using even the 150% federal poverty standard. Under the proposed changes, applicants must now pass a more subjective standard relative to the automatic waiver granted using the more objective means-tested benefits. The proposal prioritizes outdated standards that would only increase barriers to citizenship for LPRs.</p> <p>For the reasons discussed above, we strongly urge DHS and USCIS to withdraw the proposal. Of the options currently available, means-tested benefits as a factor for fee waivers provides the most objective and accurate standard for determining financial hardship. Efforts to eliminate this criteria would only prevent more LPRs from naturalizing.</p> <p>Sincerely, Quyen Dinh Executive Director Southeast Asia Resource Action Center</p>

ID	Comment.	Commentor	Comment
60	USCIS-2010-0008-0207	Upama KC	<p>I oppose the proposed changes to the form I-912 because it does not account for varying minimum wages and cost of living in different cities/states. A person who lives in a state with higher minimum wage will report a higher income compared to a person who lives in a state with a lower minimum wage but the cost of living will not be reflected in the tax return.</p> <p>This will make people living in states with higher wages ineligible under the proposed changes. The income tax return alone cannot show the financial distress an individual faces due to cost of living.</p> <p>How does USCIS plan to resolve this issue?</p>
155	USCIS-2010-0008-0294	Embry Owen	<p>I am writing to oppose changes to fee waiver regulations for filing applications with USCIS. With the proposed change, many fewer individuals will be able to remain safely in the US and/or gain the right to vote. This proposed change particularly harms individuals who are unemployed and cannot easily prove their income, and individuals who earn wages just above the federal poverty line but are still struggling to make ends meet. I believe this change is a naked attempt to prevent fewer low-income and black/brown individuals from staying in the US and becoming citizens. I strongly urge USCIS to not go through with these changes.</p>
483	USCIS-2010-0008-0656	Pia Dey	<p>I oppose this as this proposed change of policy for citizenship fee waiver badly impacts the families below a certain income threshold.</p>

ID	Comment.	Commentor	Comment
586	USCIS-2010-0008-0687	Christina Guros	<p>I oppose the proposed changes to the I-912 Fee Waiver because it is unnecessary and will cause U.S. Citizenship and Immigration Services (USCIS) to lose revenue.</p> <p>USCIS asserts that the reason for the proposed rule change is to standardize the income level of those who would be eligible for a fee waiver. While the implementation of this change may ensure that no one above 150 percent of the federal poverty level receives a fee waiver, it will hurt the overall efficacy and bottom line of USCIS, while preventing those at the lowest income levels from accessing the fee waiver. It is inefficient and counterproductive to the overall goals of the agency in several ways.</p> <p>First, ensuring that those slightly above 150 percent of the poverty line do not access the fee waiver is an unnecessary and counterproductive goal. Families earning income slightly above the poverty level who would be denied the fee waiver under this new rule would not be able to then save up the money to pay for the filing fees. Those who are slightly above poverty level who are eligible for state benefits are deemed low-income enough to warrant such state assistance, meaning that without this assistance, they would be unable to healthily sustain their families. To assume that those who are receiving assistance in this way are 1) taking advantage of the USCIS guidelines and 2) would be able to come up with the USCIS filing fees on their own is ridiculous. A family earning slightly above 150 percent of the poverty line would struggle in almost any city in this nation and would be hard pressed to save up the hundreds to thousands of dollars for USCIS fees.</p> <p>Second, it hurts those who are well below the poverty line. This rule change does more than prevent those at 150 percent of the poverty line from accessing the fee waiver. It prevents those well below the poverty line from accessing the fee waiver. While many working poor would be able to switch from using proof of benefits to using tax returns when filing the fee waiver, those who have earned too little income to file taxes, those who are well below the poverty line, would not be able to provide this evidence. They will also be unable to save up for the filing fee on this extremely low fixed income. So, the proposed fee waiver change goes well beyond the stated purpose to standardize the process, and most severely hurts those most in need of the fee waiver. It also does not produce any gain for the agency, as no additional filing fees will be secured.</p> <p>Hurting both families slightly above 150 percent of the poverty line, and families who are well below it, is inefficient and decreases USCIS revenue. Many studies show that those who are able to gain and maintain legal status, and those who naturalize to US citizens, become more economically stable, gaining income and wealth, and in turn investing into the US economy. To cut off both the lowest income and the working poor from accessing stabilizing immigration benefits means they will not access the economic gains associated with this stabilization.</p>

ID	Comment.	Commentor	Comment
588	USCIS-2010-0008-0691	Christina Guros	<p>I oppose the rule change proposal by the Department of Homeland Security to reduce the eligibility options for the fee waiver because it applies unreasoned standards that go against the traditional adjudication of and the law governing the fee waiver request.</p> <p>Prior to 2010 there was not even a Form I-912 Fee Waiver Request document, and to this day fee waiver requests can be submitted without use of that form so long as applicants provide enough information to demonstrate their inability to pay. Requiring the use of Form I-912 and severely limiting the evidence that can be used to prove inability to pay is a proposal not substantiated by any need or inefficiency demonstrated by USCIS.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit fee waiver requests created by the applicant, such as letters or affidavits, that comply with 8 C.F.R. 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. 103.7(c)(2) and is therefore impermissible.</p> <p>The standard put forth by US Citizen and Immigration Services (USCIS) in their Adjudicators Field Manual is the inability to pay (https://www.uscis.gov/ilink/docView/AFM/HTML/AFM/0-0-0-1/0-0-0-1067/0-0-0-1582.html), which is what 8 C.F.R. 103.7(c) requires. Receipt of a means-tested benefit is sufficient evidence of inability to pay and USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee.</p> <p>USCIS provides no reason to stray from the inability to pay standards it has used for years to instead rely predominately on the use of the federal poverty line as the criteria. Limiting the ways in which families can prove their inability to pay by eliminating receipt of means-tested public assistance as an evidentiary option makes no sense, especially while the agency simultaneously maintains the economic hardship option for the fee waiver. If USCIS wanted all families to prove their incomes to be under 150 percent of the federal poverty guidelines, then there is no reason to maintain the option of proving financial hardship. And if financial hardship is potentially an option for obtaining a fee waiver, then why is the government determination that a family needs public assistance insufficient to prove inability to pay. Claiming the need for standardization, while still maintaining an option that is completely non-standard in the form of the economic hardship criteria is illogical. Instead, USCIS is only attempting to limit the number of people who access the fee waiver, no matter their inability to pay.</p>

ID	Comment.	Commentor	Comment
82	USCIS-2010-0008-0233	Alexandra Olins	<p>This proposed revision to the fee waiver eligibility determination is bad public policy.</p> <p>Eligible clients who received a means-tested public benefit are determined to be eligible for said benefit at the state level, by government workers who are trained to interpret their pay stubs, tax returns, household incomes, household size, and based on all of that, which benefits they are eligible for at the state level.</p> <p>All of that takes time, and they are paid to do so, via state tax revenues. There is no need for USCIS to take on the job of vetting their eligibility again. To do so is redundant, and is a waste of tax dollars. As an American taxpayer, I think it is a wasteful allocation of my tax dollars to have federal workers spend their time verifying what has already been done, without error, at the state level.</p> <p>Surely, given the considerable backlog of N-400 applications at USCIS, there are better things that USCIS offers could do with their time than adjudicating eligibility matters that have already been adjudicated.</p> <p>This proposed change makes no sense. It is bad public policy and an inefficient use of tax payer dollars to pay federal government workers to do what has already been done at the state level. Please think hard about this proposed change. It is a solution in search of a problem, and it's only going to increase processing times at USCIS, which is also bad public policy.</p> <p>ID: USCIS-2010-0008-0233 Tracking Number: 1k2-969b-p25m Document Information Date Posted: Oct 30, 2018 Show More Details</p>

ID	Comment.	Commentor	Comment
104	USCIS-2010-0008-0249	Jared Knutzen	I personally know many refugees and other immigrants in my local community who have gone through or plan to go through the established processes for acquiring a green card and becoming a U.S. citizen. These individuals are hard working, dedicated, and patriotic to their new country. Our current policy for fee waivers and exemptions affords these individuals a pathway that acknowledges the difficult financial realities they face starting a new life. Changing these regulations to use the federal poverty line as a measure for eligibility ignores the contextual reality of economics. Where I live in Seattle the cost of living is significantly higher than in many other parts of the country. This new process would not account for local differences in the cost of living, and thus the impact on applicants' ability to pay the high filing fees for documentation. Cost of living and location are key factors that should be taken into account. States have already provided a means-tested method to establish financial need through state benefits programs. These methods should continue to be used as a valid method for establishing eligibility for fee waivers and exemptions for USCIS.
128	USCIS-2010-0008-0254	Esther Kemball	This proposal would make it harder for many immigrants to attain the status they are legally entitled to because they cannot pay the fees. It is true that states have different income levels to assess benefit eligibility, but much of this is due to the fact that the cost of living varies a lot by state. People in states with high living costs may be unable to afford these fees, even if they are above the income threshold set by USCIS.

ID	Comment.	Commentor	Comment
177	USCIS-2010-0008-0324	Guadalupe Leyva	<p>I am opposed to the proposed changes to the determination of eligibility for a fee waiver for the following reasons:</p> <p>First, a rebuttal to the reasoning the following reason for changes: USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver. Different states have widely variable cost of living averages, and thus it makes sense that income levels should be inconsistent when being used to determine eligibility for a fee waiver. According to the Department of Health and Human Services, The Census Bureaus poverty thresholds are the same nationwide, with no separate figures for different states, metropolitan areas, or cities. Also according to DHHS, The Department of Health and Human Services poverty guidelines, which are a simplified version of the Census Bureaus poverty thresholds used for program eligibility purposes, are the same for the 48 contiguous states and the District of Columbia. This means that in effect, if the poverty-guideline threshold is the only manner of being eligible for a fee waiver (financial hardship notwithstanding), then any individual living in a more expensive state, such as my home state of California, will be discriminated against because the same income in California provides a much lower standard of living than in most other states. Succinctly stated, poverty in California is NOT the same as in other states because of our high cost of living. Therefore the proposed changes would provide unequal access to individuals applying for a fee waiver and would be discriminatory for residents of high cost areas.</p> <p>Secondly, I 100% concur with the following comment previously noted: If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p> <p>I am therefore opposed to the proposed changes to the determination of eligibility for a fee waiver.</p>

ID	Comment.	Commentor	Comment
203	USCIS-2010-0008-0402	Julia Hause	<p>I would like to state my opposition to the proposed initiative to end public benefits as a means to assess the eligibility of a fee waiver for low income residents applying for citizenship. Attached are additional supporting arguments outlined by the organization I work for expressing the injustice in this proposed amendment. See attached file(s) Church World Service’s Comments on the Proposed Change to Form I-912, Fee Waiver</p> <p>Church World Service (CWS) respectfully submits its opposition to the proposed change to the eligibility criteria of the Fee Waiver, Form I-912, and provides the following comments.</p> <p>CWS, founded in 1946, is a non-profit organization dedicated to promoting global community development through programs and partner organizations worldwide that support sustainable social and economic development. CWS is also dedicated to assisting vulnerable immigrant populations through our Immigration and Refugee Program (IRP). IRP is comprised of several departments that provide assistance to refugees and immigrants through our cooperative agreements with the U.S. Citizenship and Immigration Services (USCIS), the U.S. Department of State (DOS), and the Office of Refugee Resettlement (ORR), as well as private donations and grants.</p> <p>As part of our cooperative agreements with DOS and USCIS, CWS has assisted in resettling nearly half a million refugees and over seventy-thousand Cuban and Haitian entrants. IRP’s legal component provides legal services to low income immigrants through our network of over twenty-one legal departments and affiliates located throughout the United States. Our legal departments consist of attorneys and accredited representatives that assist in providing immigration services at little to no cost to low income immigrants through various grants.</p> <p>Our extensive experience and background assisting refugees and vulnerable immigrant populations—particularly immigrants that depend on the fee waiver—allows us to provide valuable insight on not only the detrimental effect the proposed change to the fee waiver will have on immigrants, but also on the importance of the fee waiver in achieving self-sufficiency for many immigrants.</p> <p>The proposed change seeks to eliminate the receipt of means-tested benefits from the eligibility criteria for the fee waiver. Eligibility would be limited to those proving household income at or below 150% of the Federal Poverty Guidelines (FPG) or financial hardship. The basis for the proposed change is that states use different income levels to grant benefits, which result in inconsistent income levels used to qualify for a fee waiver. However, states use different income levels to award</p>

ID	Comment.	Commentor	Comment
316	USCIS-2010-0008-0480	Larry Fish, Fish Family Foundation	<p>FISH FAMILY FOUNDATION November 14, 2018 Ms. Samantha Deshommes Chief, Regulatory Coordination division, Office of Policy and Strategy U.S. Citizenship and Immigration Services, Department of Homeland Security 20 Massachusetts Avenue NW Washington, D.C. 20529-2140 Re: OMB Control Number 1615-0116; United States Citizenship and Immigration Services, Docket ID USCIS- 2010-0008</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Fish Family Foundation to express our opposition to the USCIS proposal to eliminate fee waivers for immigrants receiving public benefits such as Medicaid or food stamps. As longtime supporters of citizenship and funder of immigrant interests, we know that citizenship is the key to full social inclusion and economic prosperity for many of our newest residents. The proposed change would greatly limit access to the benefits of citizenship for those who face the greatest challenges to acquiring it.</p> <p>This change would require those requesting a fee waiver to face the time-consuming and often difficult process of proving that their household income is below 150% of the Federal Poverty Guidelines. USCIS argues that current guidelines are not "equal" because state poverty guidelines vary, and the change would make the group who qualifies for a fee waiver more consistent across states. However, "equal" is not equitable in this case, as state cost of living varies: \$40,000/year in Massachusetts does not stretch as far as the same salary in Louisiana.</p> <p>The proposed change would also be taxing on USCIS staff, who would need to determine if an applicant's income is low enough to warrant a fee waiver. For those receiving benefits, a government agency has already completed this assessment. Duplicating the process would seem to mismanage taxpayer dollars. We would rather have funds go towards helping new citizens integrate rather than pay for lawyers to help them navigate towards citizenship.</p> <p>The change will create a group of people who cannot afford to pay the fee for naturalization but who also do not qualify for a fee waiver. Preventing those who wish to become citizens from doing so because they face financial difficulties seems to go against our shared values of a united America where all who qualify have opportunities to realize their potential.</p> <p>I write with the strong belief that this change will make USCIS and the naturalization process inefficient and burdensome for our most vulnerable newcomers. I ask you to reconsider, as frankly, I do not agree with the USCIS assessment that the proposed changes will benefit our communities.</p>

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621	USCIS-2010-0008-0856	Christina Guros	<p>I oppose the change to the US Citizenship and Immigration Services (USCIS) fee waiver process proposed by the Department of Homeland Security (DHS) because it places an arbitrary and meaningless threshold to determine a persons inability to pay.</p> <p>The proposed rule change would have all fee waiver applicants (except the extremely rare applicant applying on the basis of economic hardship) prove their income to be less than 150 percent of the federal poverty level. Aside from the severe inefficiencies and harm of this proposal, it is also based on an arbitrary income threshold without any examination of its utility.</p> <p>When USCIS introduced Form I-912, Request for Fee Waiver in 2010, one of the bases of proving inability to pay was evidence of income below 150 percent of the poverty line. When given as an option for proving inability to pay, there is perhaps little harm in continuing to use 150 percent of the poverty line as a threshold. Families who have been determined by a state agency to be in economic need and therefore eligible for safety net assistance may use evidence outside the 150 percent maximum to prove their inability to pay. Yet USCIS is proposing to now use 150 percent of the poverty threshold as the main standard for proving inability to pay. Perhaps this threshold would have worked when it was introduced in 2010, but the current environment of extreme economic inequality and high cost of living make this standard ineffectual in 2018.</p> <p>Earlier this year the National Low Income Housing Coalition released a study showing that minimum wage would not cover rent anywhere in the United States (https://www.cbsnews.com/news/minimum-wage-doesnt-cover-the-rent-anywhere-in-the-u-s/?fbclid=IwAR2eKx3fRzsvJHwZHaaob_Lj6FLjbvXu9gDI7IDeTpU0n7d2-knJf8rkpEg). More important to this discussion, it shows that nationally, a family would need to earn \$22.10 an hour to afford a modest two-bedroom apartment. Assuming this rate applied to full-time work, annual earnings to afford a two-bedroom apartment would be \$45,968. For a family of four, this would be well above the USCIS fee waiver standard of \$37,650 of 150 percent of the federal poverty guidelines. It is also above the threshold for a family of five. A family of five that is unable to afford a two-bedroom apartment can hardly be expected to come up with hundreds to thousands of dollars in USCIS filing fees.</p> <p>USCIS very clearly proposes to set a standard of need for the fee waiver that is below the amount of income required to very modestly house a family of four or five in the United States. This standard of 150 percent of the poverty line becomes even more ludicrous when looking at the cost of living for a one- or two-person household. To afford a one-bedroom apartment a person or family must earn \$17.90 per hour working 40-hours a week, 52 weeks per year, adding up to an annual salary of \$37,232. Yet the poverty guidelines for one-, two- and three-person households are well below this level at \$18,210, \$24,690 and \$31,170 respectively. The standard for being able to house ones family in modest accommodations is well above 150 percent of the federal poverty guidelines.</p>
1041	USCIS-2010-0008-1157	Emil DELGADO	<p>The government alleges that states have different income criteria for assessing public assistance, nevertheless ignores the common factor: economic need. Those that request means tested benefits do so out of financial necessity and eliminating the fee waiver in this area will just cause further financial hardship.</p>

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1124	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>Comment part 1: November 27, 2018</p> <p>Submitted via Regulations.gov</p> <p>Samantha Deshommes</p> <p>Chief, Regulatory Coordination Division</p> <p>USCIS Office of Policy and Strategy</p> <p>Department of Homeland Security</p> <p>20 Massachusetts Avenue NW</p> <p>Washington, DC 20529-2140</p> <p>RE: Comments in Opposition to DHS e-Docket No. USCIS-2018-21101, OMB Control No. 1615-0116, Proposed Rulemaking Concerning Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>We are writing you to strongly oppose USCIS’s proposed rule change to eliminate the current policy of considering means-tested benefits as evidence of eligibility for a fee waiver.</p> <p>Founded in 1979, NILC is the leading advocacy organization in the U.S. exclusively dedicated to defending and advancing the rights and opportunities of immigrants and their families. We focus on issues that affect the well-being and economic security of immigrant children and their families with low income: health care and safety net programs; education and training; workers’ rights; and federal and state policies affecting immigrants.</p> <p>NILC has been at the forefront of many of the country’s greatest challenges in addressing immigration issues and has developed particular expertise in public benefits laws and policies affecting low-income immigrants.</p> <p>The proposed changes are unjustified, complex, and counterproductive. Rather, we respectfully request that USCIS withdraw this proposed rule and continue processing fee waivers pursuant to its current policy. We urge you to retain the I-912 fee waiver form and accompanying guidelines set forth in Policy Memorandum PM-602-0011-1, published March 12, 2011.</p>

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1126	USCIS-2010-0008-0343	Mass Mail Campaign 1: Comment Submitted by Faridah Bahume, Church World Service (CWS), Total as of 11/13/2018: 7	<p>Comment Part 2: Rationale for Eliminating the Receipt of Means-Tested Benefits Fails to Consider the Different Costs of Living in Each State</p> <p>USCIS's rationale behind the proposed change fails to consider that states have eligibility criteria for benefits that are consistent with the cost of living in their state. Cost of living is calculated based on how a person's salary will be consumed by the cost of goods, services, and housing in a certain geographic area. Families with the same household income, but living in different states, will have different disposable income. To illustrate this, we used Salary.com, a source found on the U.S. Department of Labor's website, to compare the cost of living for a family of four in Chattanooga, TN and in Miami, Florida.</p> <p>According to Salary.com, the cost of living in Miami is 29.3% higher than the cost of living in Chattanooga. A family of four in Miami would need to have an income of \$48,668 (nearly 200% of the FPG) to have the same standard of living as a family in Chattanooga with an income of \$37,650 (150% of FPG). The family in Chattanooga will spend 32% of their income on rent (based on an average two-bedroom monthly rent of \$995 as per Apartments.com). The family in Miami will spend almost 49% of their income on rent (based on an average two-bedroom monthly rent of \$1,587 as per Apartments.com). The family in Chattanooga will have more disposable income than the family in Miami with the same income (or at 200% of FPG) because of the different cost of living of each state. Under the proposed change, the family in Miami would not qualify for a fee waiver, even though it would have less disposable income to pay for filing fees than the family in Chattanooga who would qualify for a fee waiver and would have more disposable income. Currently, the fee waiver helps balance this disparity in disposable income by allowing the use of means-tested benefits to qualify for a fee waiver.</p>

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1132	USCIS-2010-0008-0411	Veronica Serrato, Project Citizenship	<p>Comment part 2: B. The Proposed Change is not tailored to the justification for change. The Proposed Change purportedly is targeted at "inconsistent income levels being used to determine eligibility" because some states have different levels for qualification for means-tested benefits. Notably, the Notice does not indicate any harm resulting from this alleged inconsistency. Nor does the Notice address the fact that any inconsistency may reflect cost-of-living variations across states that are not reflected in the Federal Poverty Guidelines. Under a strictly income-based criterion for a fee waiver, residents of Booneville, Kentucky will be judged under the same 150% of the Federal Poverty Guidelines as residents of Anaheim, California. A household of 3 is capped under the 2018 Federal Poverty Guidelines at \$31,170 per year for an income-based fee waiver, regardless of the cost of living in the urban or rural setting. Most significantly, for many of the most common benefits (including SNAP (food stamps) and Temporary Assistance for Needy Families), even states with the least stringent income tests set the maximum qualifying income level at less than 150% of the federal poverty level. Therefore, applicants receiving those benefits necessarily already have demonstrated low income satisfying the standard that USCIS imposes for income-based fee waivers. Accordingly, not crediting proof of a means-tested benefit in these cases achieves nothing other than additional work for the applicant and USCIS.</p> <p>Concerns about consistency across fee waivers would be better addressed by less drastic measures that put less burden on USCIS. For example, USCIS should accept fee waiver applications based on at least those means-tested benefits that require income below a particular threshold (e.g., SNAP and TANF as noted above), and could survey the state-by-state administration of means-tested benefits to determine which best reflect USCIS's assessment of low income.</p>

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1189	USCIS-2010-0008-0998	Julie Pasch, Houston Immigration Legal Services Collaborative	<p>Comment part 4: Different State-Level Eligibility Considers Cost of Living and Other Nuances</p> <p>The USCIS Federal Register notice indicates that one reason for eliminating the receipt of a means-tested benefit from the fee waiver eligibility criteria is because different states have different income thresholds to determine eligibility for a means-tested benefit. While this is sometimes true, the differences are reasonable, taking into account costs of living and other local factors (which the Federal Poverty Guidelines do not do) and the differences are generally not large.</p> <p>For example, SNAP benefits, which are a means-tested benefit and which many clients of HILSC member organizations have used under the current1-912 to obtain a fee waiver, use the same income requirements across the United States - eligibility is set at 130% of the Federal Poverty Guidelines for gross income and 100% of the Federal Poverty Guidelines for net income.¹⁴The only exceptions are Alaska and Hawaii, which have different Federal Poverty Guidelines. This demonstrates that USCIS's stated goal of equalizing adjudications for residents of different states is not well-served by this proposed rule change.</p> <p>Benefits that are different on a state level, such as Temporary Assistance for Needy Families (TANF) do vary between states, but these differences are often small and take into account differing costs of living, and virtually all states limit TANF eligibility to families below 100% of the Federal Poverty Guidelines. For example, a Congressional Research Service examination of state TANF benefits found that the maximum earnings level for applicants in all states except Wisconsin was below the Federal Poverty Guidelines; a TANF recipient in Wisconsin could earn up to 115% of the Federal Poverty Guidelines in very limited circumstances.¹⁵Even though the eligibility guidelines for various means-tested benefits may vary between states, these variations are reasonable and indicate that the person is low income. USCIS should not eliminate the availability of fee waivers based on the receipt of a means-tested benefit based on differing requirements between states.</p>

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1200	USCIS-2010-0008-0956	Zenobia Lai, Catholic Charities - Houston	<p>Comment part 3: III. The Proposal Is An Unjustified Tactic to Maintain USCIS as an Almost self-funded (by fee revenues) Agency</p> <p>USCIS has clear guideline in adjudicating fee waiver requests. Federal regulation provides that waiver of fees are limited to (1) the party requesting the immigration 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, i.e. one cannot seek a fee waiver if s/he is applying for an immigration benefit that requires substantial financial investment, such as an employment-based or investment-based immigration category.⁹ To request a fee waiver, an individual must “submit a written request for permission to have their request processed without payment of a fee with their benefit request. The request must state the person’s belief that he or she is entitled to or deserving of the immigration benefit applied, the reasons for his or her inability to pay, and evidence to support the reasons indicated.”¹⁰</p> <p>The proposed revision is apparently predicated on USCIS’ assertion that states use various income level to determine eligibility for means-tested benefits and hence create supposed inconsistency in income levels in determining fee waiver.¹¹ USCIS offers not a shard of evidence of such inconsistency or any data on errors in adjudicating fee waiver based on such supposed inconsistency in the public notice. Yet, it determines that it should undertake a monumental task of revising the procedures, rescinding policy memorandum and changing the form through a public comment process to correct an un-documented problem.</p> <p>In its news release announcing this proposed revision, USCIS makes apparent that the real reason for revising the established fee waiver adjudication process is to reduce the number of fee waiver granted, so that it can maintain 95% self-sufficiency through fee revenues.¹² USCIS also noted in its news release that the amount of fee waiver granted has increase \$23.6 million between FY16 and FY17.¹³ A cursory analysis of the fee revenues based on one of the highest volume of application – I485 adjustment of status – shows that there was an increase of nearly 70,000 (69,756) applications between FY16 and FY17. The application fee for I485 wasincreased from \$985 to \$1,140 on December 23, 2016.</p> <p>¹⁴ The increase in number of applications and the increase in application fee translate to almost \$152 million in increased fee revenue for USCIS.¹⁵ This does not include the \$115 increase in fee for an I-130 application, or \$30 fee increase for I-765 employment authorization application, \$45 for N400 naturalization application, or \$80 fee increase for I-751 removal of conditional status, just to name a few of the applications that USCIS routinely receives in high volumes.¹⁶ The increase in fee revenue more than offset the increase in cost of granting fee waivers during this period cited by USCIS in the news release. Even assuming that USCIS’ assertion that the cost of fee waivers has increased over time, the higher cost is a result in fee increase, not because of more fee waivers being granted. It does not justify eliminating a quarter of a million most vulnerable immigrants’ access to immigration benefits by making immigration applications out of their reach. The elimination of receipt of means-tested public benefits as evidence to support a fee waiver request does just that. USCIS cannot attain 100% fee-funded on the backs of immigrants with limited financial means.</p> <p>In the proposed revision, USCIS does not point to any evidence that states have changed its income eligibility requirement for non-federal means-tested public</p>

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1225	USCIS-2010-0008-0967	Daniel Bruner, Whitman-Walker Health	<p>Comment part 2: USCIS Should Continue to Approve Fee Waivers When Applicants Have Received Means-Tested Public Benefits</p> <p>Filing fees for many forms of relief available under our immigration laws are quite substantial, and beyond the means of many if not most lower-income individuals and families. Although guidelines provide for waivers for persons whose income does not exceed 150% of federal poverty guidelines (FPG), even persons with incomes of 200% FPG – currently \$24,280 for a household of one, \$32,920 for a household of two and \$50,200 for a household of four – can barely afford to meet basic living expenses in many areas. Filing fees of \$500+, up to \$1,000 or more, which must be paid up front, can be prohibitively expensive, particularly for those living on very modest incomes in urban areas with high costs of living. Indeed, many filing fees were substantially increased in December 2016.² The financial barrier is especially formidable for many lesbian, gay, bisexual and transgender (LGBT) individuals, who are entitled to the protection of our immigration laws as asylees or refugees from persecution. Many of these individuals do not have family networks on which they can rely for financial assistance, and many of them reside in larger urban areas, which are more receptive to LGBT people, but which also have much higher costs of living.</p> <p>Providing fee waivers for persons who are receiving a means-tested public benefit ameliorates these hardships, because such benefit programs at the state and local level take account of varying costs of living. In many higher-cost states and local jurisdictions, income limits for various benefits, particularly medical benefits, are set at 200% FPG or higher. The September 20 notice from USCIS expresses a concern that “the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver.” 83 Fed. Reg. at 49,121. However, this variation is a strength, not a weakness, of current waiver guidelines, because it considers variances in the cost of living around the country in a way that an across-the-board threshold of 150% FPG does not.</p> <p>Even individuals whose incomes are less than 150% FPG often find it very difficult if not impossible to document their income under USCIS guidelines. Many if not most people who lack any income cannot prove that fact, unless they are in a shelter. Many public benefit programs allow documentation of lack of income by means of a sworn certification from the applicant, or a statement from a nonprofit providing services to the individual or family in question. These means of documentation are not available under current USCIS guidelines. Therefore, low-income applicants and their representatives generally rely on receipt of public benefits to obtain fee waivers.</p> <p>Eliminating receiving means-tested public benefits as an eligibility ground for fee waivers would undercut the intent of our immigration laws and policies, which provide a number of avenues for relief for deserving foreign nationals of every income level. The impact is likely to be particularly harsh for survivors of persecution, trafficking and other forms of violence, who are entitled to immigration relief on humanitarian grounds. Our immigration laws and policies are particularly solicitous of such persons, who very often face tremendous challenges as survivors of physical abuse, persecution and other trauma that have disrupted their lives. For instance, Congress has exempted immigrants who have received status based on humanitarian applications from the five-year waiting period for eligibility for most means-tested federal benefits, including cashless food stamps. Cuban and Haitian entrants are exempted into the U.S. for at least one year (long-term parole is usually only</p>

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1257	USCIS-2010-0008-1099	Marjean Perhot, Catholic Charities Archdiocese of Boston	<p>Comment part 2: THE STATED REASON FOR THE PROPOSED CHANGE DOES NOT JUSTIFY THE CHANGE</p> <p>The specified reason for the proposed change does not substantiate the intended change. The proposed change states that “USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver,” concluding that USCIS must eliminate the option of requesting a fee waiver based on demonstrated receipt of means-tested benefits. We believe that the stated reason for the change does not justify the change.</p> <p>First, the stated reason for change does not account for varying costs of living across the United States. While in some areas the Federal Poverty Guidelines might indicate an accurate estimate of the cost of comfortable living for a family, for a family of four living in an area where median rent and cost of food and other expenses is higher, the relative cost of living for the family would be higher, meaning that even though certain families receiving means-tested benefits in some regions of the United States might receive more than 150% of the Federal Poverty Guidelines, programs specific to their state have determined that their income meets requirements for inability to pay for certain goods and services in their area. While certain means-tested benefit programs account for these differences in calculating income and eligibility requirements, other programs follow the same 150% limit based on the Federal Poverty Guidelines as USCIS in determining eligibility. The proposed change confirms that USCIS will “[lay] out the most salient data and evidence necessary for the determination of inability to pay.” By eliminating the option to submit proof of receipt of means-tested benefits on the Request for Fee Waiver, the proposed change would be ignoring predetermined calculations by federal, state and local benefit programs that account for significant regional living expenses throughout the country.</p> <p>Additionally, for many benefits used in the fee waiver applications we assist in submitting, the means-tested benefit’s eligibility requirements already meet USCIS’s alternative requirement of earning less than 150% of the Federal Poverty Level. By removing the option to demonstrate eligibility through receipt of public benefits, the proposed change would be authorizing the recalculation of the same verification documents submitted to aforementioned federal, state, and local agencies to determine eligibility. This would not only increase the burden on USCIS, but also redo the same work done by other sectors of the Government to determine similar if not same eligibility standards.</p>

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1369	USCIS-2010-0008-1049	Alvina Yeh on behalf of the Asian Pacific American Labor Alliance, AFL-CIO (APALA)	<p>Comment part 4: The Federal Poverty Standard is Insufficient for Accurately Measuring Financial Hardship</p> <p>USCIS argues that inconsistent income levels utilized by states to determine eligible for means-tested benefits results in varied incomes levels used for the determination of fee waivers. However, the current federal poverty guidelines do not accurately measure the costs of living in 2018. It does not consider regional differences in cost of living nor does it account for necessary expenses outside of food.</p> <p>States are correct in employing different income levels to determine financial need. Because current federal poverty guidelines do not sufficiently capture financial hardship, in 2008, then New York City Mayor Michael Bloomberg adopted the 1992 National Academy of Sciences’ recommendations for measuring poverty. Additionally, the modern costs of living in locations such as California are substantially different than those in Oklahoma.</p> <p>Given that many SEAs are concentrated in major metropolitan areas, their economic status may not be accurately captured using even the 150% federal poverty standard. Under the proposed changes, applicants must now pass a more subjective standard relative to the automatic waiver granted using the more objective means-tested benefits. The proposal priorities outdated standards that would only increase barriers to citizenship for LPRs.</p> <p>For the reasons discussed above, we strongly urge DHS and USCIS to withdraw the proposal. Of the options currently available, means-tested benefits as a factor for fee waivers provides the most objective and accurate standard for determining financial hardship. Efforts to eliminate this criterion would only prevent more LPRs from naturalizing.</p> <p>Sincerely,</p> <p>Alvina Yeh Executive Director Asian Pacific American Labor Alliance</p>

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1441	USCIS-2010-0008-1199	Cecelia Levin, ASISTA	<p>***Comment did not paste well*** Comment part 7:III. Eliminating the Means-Tested Benefit Criteria for Fee Waivers Ignores Income Disparity Nationwide</p> <p>USCIS justifies the elimination of the means-tested benefit criteria because it has found that the various income levels used in states to grant a means tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver.”³⁰ But this is exactly how means-testing benefits should work.³¹ Given that the cost of living is so varied nationwide, state agencies in some cases use their own criteria to determine income eligibility for means-tested benefits. A family of four living at 150% of the federal poverty guideline (\$37,650)</p> <p>³² in Mississippi would have to earn approximately \$50,374, (nearly 34% more) to achieve the same standard of living in New York.³³ For this reason, eligibility for means-tested benefits tends to vary by state.</p> <p>The rationale for using means-tested benefits as a criteria for fee waivers is that the applicant’s financial hardship has been pre-established by a state agency. In order to receive benefits under a means-tested program, individuals or families often have to establish their eligibility based on their own lack of income and/or assets. State agencies administering means-tested benefits must screen for financial hardship and inquire about an applicant’s assets like property, savings, as well as their income level before determining whether an applicant qualifies for a benefit. Therefore, receipt of a means-tested benefit by definition means that an individual is of limited means and that said benefit is necessary to help meet their basic needs.</p> <p>This is a straightforward criteria for determining fee waiver eligibility, and USCIS’ rationale for excluding it is unjustified. Receipt of means-tested benefits per se demonstrates an individual’s financial need, as defined by the state which knows best what is necessary to live above the poverty line within its boundaries. USCIS should continue to accept receipt of means tested benefits as evidence of an applicant’s reasons for their inability to pay” Under the</p>

ID	Comment.	Commentor	Comment
1093	USCIS-2010-0008-1213	Achutha Raman	<p>For almost two years, I have been volunteering at citizenship clinics arounds Massachusetts, and altogether must have worked with more than seventy different applicants, helping to complete N-400 and N-600 Citizenship Application Forms, as well as associated documents including the I-912 Request for Fee Waiver. Many of these applicants have persevered through difficult circumstances, and I am consistently inspired by their passion for America as well as the ideals our nation stands for. Also the son of recent immigrants, I believe it is important to encourage anyone eligible for citizenship to apply and reap the benefits.</p> <p>However, the Proposed Change to the I-912 Fee Waiver significantly threatens this. For a fuller explanation of why the Proposal is ill-conceived, please see the detailed comment by Veronica Serrato, Project Citizenship posted on Nov 14, 2018. In short, I would like to highlight that:</p> <p>(1)The problem to which the Proposal responds is not truly a problem. USCIS has noted that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver. However, this is by design, since cost-of-living varies from state. Eliminating the means-tested benefit would overlook these significant regional differences.</p> <p>(2)The proposal threatens to overburden USCIS (in addition to prospective applicants and their legal representatives) with paperwork. Under the proposal, those with income below the mandated annual limit to file taxes would have to provide substantially more information than before. USCIS would have to pore through this.</p> <p>Thank you for your consideration.</p>

ID	Comment.	Commentor	Comment
1207	USCIS-2010-0008-0972	Irena Sullivan, Tahirih Justice Center	<p>Comment part 3: II. The harm that the proposed revision to Form I-912 will inflict on survivors far outweighs its potential benefits; alternatives that don't harm survivors should be implemented instead.</p> <p>The stated purpose of the proposed revision is to eliminate inconsistency in income levels among fee waiver recipients, as eligibility for means-tested benefits varies by state. Instead of prohibiting applicants from submitting proof of receipt of benefits to achieve this goal, USCIS could, along with such evidence, require evidence showing that the relevant benefits are only available to those whose income level matches the level required to be eligible for a fee waiver. Currently an applicant's income must be at or below 150% of the Federal Poverty Guidelines to be eligible for a fee waiver. Therefore, applicants who receive a particular benefit could submit proof that the benefit is not available to those whose income is above 150% of the guidelines.</p> <p>Survivors of human trafficking, like our client Sofia*, must often file an application for a waiver of inadmissibility when applying for the T visa, due to circumstances beyond their control resulting from the trafficking. While the T visa petition does not require a fee, an application for a waiver of inadmissibility does. Sofia, from Ethiopia, endured Female Genital Mutilation/Cutting, kidnapping, forced marriage, domestic violence, rape, and labor trafficking. She hadn't yet been authorized to work when she requested a fee waiver for her waiver of inadmissibility, so like Maria, she was unable to submit pay stubs or tax returns. Instead, Sofia provided proof that she receives county subsidized medical care which is only available to those whose household income is under 150% of the poverty guidelines. Her request was granted. Under the proposed revision to Form I-912, Sofia's request would have been denied – effectively preventing her from applying for a T visa – despite her eligibility for relief. For survivors of human trafficking like Sofia and others, the T visa is an essential bridge to safety and healing. Survivors should not be arbitrarily thwarted in pursuing such relief because of a lack of traditional documentation of their household income.</p> <p>The detriment to survivors resulting from the proposed revision to Form I-912 far outweighs any purported benefit of consistency that it might confer. Denial of fee waivers to those who otherwise meet the income eligibility requirements is unnecessary in light of alternatives, as outlined above. The ultimate outcome of the proposed revision is prolonged poverty and instability for survivors and the emboldening of violent perpetrators. Rather, implementation of an efficient and fair process benefits all stakeholders involved.</p>

ID	Comment.	Commentor	Comment
982	USCIS-2010-0008-1070	Wade Askew, Legal Services of Northern California	<p>Comment part 1: November 26, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>Legal Services of Northern California writes to oppose changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process for organizations like LSNC, individual applicants and families, and the United States Citizenship and Immigration Services (USCIS) itself. The unnecessary and significant burdens that the rules would impose would only lengthen an already troublingly-large backlog of pending requests while erecting barriers for deserving low-income residents wishing to become United States citizens.</p> <p>Legal Services of Northern California (LSNC) is a non-profit legal aid organization which provides free legal services to thousands of clients annually, striving to deliver quality legal services that empower the poor to identify and defeat the causes and effects of poverty within their community. LSNC's eight offices and various programs regularly help low-income Legal Permanent Residents who wish to apply for U.S. citizenship. LSNC clients may seek to apply for citizenship for a multitude of reasons, including potential economic benefits that may facilitate coming out of poverty. Almost all applicants that LSNC helps apply for citizenship</p>

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1154	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 7: B. The Proposed Requirement that Family Members Submit Separate Forms I-912 Is Unnecessary and Unduly Burdensome</p> <p>The proposed requirement that each family submit a separate fee waiver application is similarly harmful because it places an additional time and resource burden on families who may presently submit a single I-912 form for all family-related applications or petitions filed at the same time. Under the proposal, each family member filing a petition would be required to complete a separate I-912 form. The current ability of family members to submit a single fee waiver application simplifies the filing process by collecting all relevant data on a single form with all necessary documentation attached once. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. The proposal would require every applicant to complete the I-912 with the same household information, gather multiple copies of the required documentation being requested, including an IRS transcript or verification of non-filing. For example, if an individual, their spouse, and their children each submit Form I-765, Application for Employment Authorization, the proposal would require each of them to submit separate I-912 forms, documenting the same household income information with identical supporting documentation. There can be no rational basis for this approach, which increases the burden on the applicant, replicates the information needed for a family who could have submitted their request together, and increases the number of fee waiver applications USCIS adjudicators must process. As with other changes proposed, USCIS offers no justification for this added burden on applicants, or any rationale for using agency resources in this manner. USCIS's failure to demonstrate it engaged in reasoned decision-making about the potential costs of this added requirement makes this proposal appear arbitrary and capricious.</p>
1327	USCIS-2010-0008-0928	Joomi Kim, Korean Community Service Center	<p>Comment part 2: B.This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>Requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location</p>

ID	Comment.	Commentor	Comment
1260	USCIS-2010-0008-1073	Miko Tokuhaman Olsen on behalf of Legal Aid Society of San Diego, Inc.	Comment part 2 :Second, requiring each applicant to submit his/her own form will be a huge resource and time burden on applicants. Currently, family units can submit a single fee waiver application. This simplifies the filing process because all relevant data is the same and collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing he/she is not required to file federal taxes, and verification of the non-filing from the IRS, to list a few. This increases the burden on the applicant and duplicates information needed for a family unit that could have submitted its request together.
1456	USCIS-2010-0008-1226	Michelle Seyler, Central American Resource Center - Los Angeles	Comment part 2: B. Family members should not be required to submit their own I-912 Requiring each applicant to submit their own I-912 will be a time and resource burden on applicants. Currently, family members can submit a single fee waiver for multiple applicants, which greatly eases the process because it only requires the applicants to compile their financial information in one location. This is particularly important for families who are applying for relief or benefits for their minor children because documenting each individual child's financial information is time consuming and confusing for clients. This proposal would require each applicant to gather the required evidence, which includes IRS transcripts, proof that the person is not required to file taxes, and verification from the IRS of the applicant's non-filing status.

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394	USCIS-2010-0008-0597	Lucy Betteridge	<p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for immigration</p>

ID	Comment.	Commentor	Comment
1486	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>Comment part 3: A. This proposal will place significant burdens on individuals and their families in applying for immigration benefits.</p> <p>To demonstrate eligibility for a fee waiver, an applicant can show: 1) receipt of a means-tested benefit, 3) income below 150% of the federal poverty guidelines, or 3) otherwise demonstrate financial hardship. The first two standards serve as bright-line tests for applicants to qualify for a fee waiver, whereas the last criteria is a discretionary decision made by the adjudicator and requires more documentation and time in putting together an application. By removing one of two bright-line tests, this proposal will place a time and resource burden on those applying for a fee waiver. The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete the waiver application process.</p> <p>The proposal eliminates an individual’s ability to use proof of receipt of means-tested public benefits to demonstrate an inability to pay the prescribed fee. This proof is often the most common and straightforward way to demonstrate eligibility, as applicants have already proven current receipt of benefits by providing a copy of an official eligibility letter, or Notice of Action, from the government agency administering the benefit. In some cases, applicants are not otherwise able to complete the form, because they do not have other required documentation at hand to demonstrate their need. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is imposing an additional burden on immigrants who already are facing the economic challenge of paying for application fees. Moreover, individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS.</p> <p>In addition, if finalized in its proposed form, more applicants will need to provide additional documentation to qualify for a fee waiver. The proposal requires individuals to obtain new documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or delays involving delivery of mail. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement –documents that individuals (if required to file) must have on hand if they have’t kept a copy. Under the proposed change, the</p>

ID	Comment.	Commentor	Comment
1215	USCIS-2010-0008-1004	Molly Coe, Volunteers of Legal Service	<p>Comment part 3: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals keep copies on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail. Many of the VOLS Immigration Project clients are high school and college students at the beginning of their careers who participate in internships, work-study</p>

ID	Comment.	Commentor	Comment
1315	USCIS-2010-0008-1002	Peggy Russell, on behalf of Mid Minnesota Legal Aid (Legal Aid)	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicantgenerated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a selfgenerated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the applicants to want for immigrants to individuals who were able to pay the fee. This proposal</p>

ID	Comment.	Commentor	Comment
933	USCIS-2010-0008-0996	Christina Guros	<p>I oppose the change put forth by Department of Homeland Security (DHS) to limit the US Citizenship and Immigration Services (USCIS) fee waiver process. The proposed change severely increases government resources spent on adjudicating fee waiver applications, which limits the ability to adjudicate revenue-generating applications.</p> <p>The DHS proposal would require each applicant to submit their own form which will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time.</p> <p>According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>It also wastes USCIS resources. For every I-912 that would be submitted on behalf of a family, living in the same household and submitting the same evidence, USCIS proposes to have each individual submit their own application. This wastes time, paper, ink and postage on the part of the applicants or their legal representatives. Reviewing each similar if not identical application is a complete waste of immigration officer time. And rejected requests will mean paper and postage paid for by USCIS to return each application to the applicants. USCIS has not offered any indication as to why it would be more effective or efficient to have each household member submit their own form.</p> <p>This proposed change is absolutely unnecessary and wasteful, both of applicant time and resources, and USCIS time and resources. For this reason, I strongly oppose this change.</p>

ID	Comment.	Commentor	Comment
934	USCIS-2010-0008-0997	Maha Jahshan	<p>I oppose the change put forth by Department of Homeland Security (DHS) to limit the US Citizenship and Immigration Services (USCIS) fee waiver process. The proposed change severely increases government resources spent on adjudicating fee waiver applications, which limits the ability to adjudicate revenue-generating applications.</p> <p>The DHS proposal would require each applicant to submit their own form which will be a huge resource and time burden on applicants. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>It also wastes USCIS resources. For every I-912 that would be submitted on behalf of a family, living in the same household and submitting the same evidence, USCIS proposes to have each individual submit their own application. This wastes time, paper, ink and postage on the part of the applicants or their legal representatives. Reviewing each similar if not identical application is a complete waste of immigration officer time. And rejected requests will mean paper and postage paid for by USCIS to return each application to the applicants. USCIS has not offered any indication as to why it would be more effective or efficient to have each household member submit their own form.</p> <p>This proposed change is absolutely unnecessary and wasteful, both of applicant time and resources, and USCIS time and resources. For this reason, I strongly oppose this change.</p>

ID	Comment.	Commentor	Comment
805	USCIS-2010-0008-0964	Anonymous	<p>I am opposed to this proposal for several reasons.</p> <p>This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities. The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. In addition, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible. The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The increased requirements and additional evidence to be collected from applicants on the proposed amended Form I-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will lead to individuals making more mistakes, adding to the processing time of the application. In some cases, applicants may not be able to complete the form because of a lack of required documents.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p>

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1108	USCIS-2010-0008-1228	Iris Bercovitz, SEAMAAC	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf the Civic Engagement Department at SEAMAAC (Southeast Asian Mutual Assistance Association Coalition) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>SEAMAAC is a non-partisan, community-based non-profit dedicated to providing services to Asian American Pacific Islander communities in the Greater Philadelphia area. The Civic Engagement team at SEAMAAC is working to activate and empower Asian American Pacific Islander communities be fully engaged in the civic process. Additionally, we work in collaboration with other community-based organizations to provide services such voter education, protection and registration to Asian American Pacific Islander communities. A large portion of the communities which we serve are refugees and immigrants. In Pennsylvania, 47% of Asian Americans in Pennsylvania speak English less than “very well.”</p> <p>1 SEAMAAC assisted 57 clients in seeking for citizenship as well as the Civic Engagement department's experience</p>
727	USCIS-2010-0008-0897	Grace Huang, Asian Pacific Institute on Gender- Based Violence	Comment part 1:
702	USCIS-2010-0008-0956	Zenobia Lai, Catholic Charities - Houston	Comment part 1:
942	USCIS-2010-0008-1012	Julia Brown, Immigrant Legal Advocacy Project	Comment part

ID	Comment.	Commentor	Comment
831	USCIS-2010-0008-0781	Bridgit Burke, The Legal Project	<p>Samantha Deshommes, ChiefSubmitted via www.regulations.gov Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>Please accept The Legal Project, Inc.s comments, in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116.</p> <p>The Legal Project, Inc., a not-for-profit organization located in Albany, NY, provides low cost legal services to the working poor and indigent. Our many programs include representation in immigration matters, family court and divorce for individuals experiencing domestic violence, college students who are victims of interpersonal violence and foreclosure prevention. While we have limited resources, from January 2017 to September 2018, our program assisted 450 immigrants in a range of services from one on one consultations to full representation. We handled a variety of immigration cases, including family-based petitions, DACA, asylum, U and T petitions, TPS and VAWA.</p> <p>Many of our clients are struggling to afford the basic necessities of life such as rent, food and medical expenses. In addition to their overwhelming financial reality, they are also often overcoming significant personal tragedies such as domestic violence, sexual assault and human trafficking. The proposed changes will create financial and logistical challenges, and therefore, may pose insurmountable obstacles to their ability to seek an immigration benefit or naturalization.</p> <p>By eliminating the use of the I-912, requiring each applicant to submit a separate waiver form, eliminating the use of forms of means tested public benefits and</p>

ID	Comment.	Commentor	Comment
857	USCIS-2010-0008-0926	Eli Cohen, New York City Bar Associations Immigration and Nationality Law Committee	<p>Comment Part 1: Re: USCIS Docket ID USCIS-2010-0008, OMB Control # 1615-0116, Revision of a Currently Approved Collection: Request for Fee Waiver</p> <p>On behalf of the New York City Bar Association (City Bar), this comment is submitted in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to the fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018 (the "Proposed Rule").</p> <p>I. BACKGROUND</p> <p>a. The New York City Bar Association</p> <p>With 24,000 members, the mission of the City Bar is to equip and mobilize the legal profession to practice with excellence, promote reform of the law, and advocate for access to justice in support of a fair society. The Immigration and Nationality Law Committee addresses diverse issues pertaining to immigration law and policy, including the prolonged detention of non-citizens, the administration of justice in the U.S. immigration system, constitutional issues impacting immigration legislation, and questions arising from claims for international human rights protection such as political asylum. Last month, the City Bar issued a statement opposing the proposed changes by USCIS to broaden the public charge rule.¹ The Proposed Rule, which will make it more difficult for low income noncitizens to have application fees waived, likewise penalizes noncitizens who are not wealthy and will make it more difficult for them to successfully file applications to improve their immigration status.</p> <p>b. Current Rules Governing Fee Waivers</p> <p>The government processing fees associated with USCIS applications can run from a few hundred to more than a thousand dollars for a single immigration application.² This can be prohibitive for some otherwise eligible applicants.</p> <p>Therefore, current regulations permit certain applicants to request a fee waiver if they are “unable to pay the prescribed fee.” Under current rules, there are three ways for applicants to demonstrate an inability to pay the prescribed fee: (1) presenting documentation that they receive a means-tested benefit; (2) presenting documentation that their income is below 150% of the Federal Poverty Level (FPL); or (3) presenting documentation that the fee would constitute a financial hardship.³ The head of household submits an application on Form I-912 on behalf of each member of the household who requires a fee waiver. Beneficiaries of petitions filed by others can submit a fee waiver on their own behalf, without having to depend on the petitioner to do it for them. Generally, only certain categories of non-citizens approved by Congress in connection with welfare reform in 1996 are eligible for the means-tested benefits that would qualify a person for a fee waiver. These same categories of non-citizens—including humanitarian entrants such as asylees, refugees, persons who helped the U.S. military, victims of crime and long-time workers who have amassed 40 qualifying quarters of FICA taxes—are similarly not subject to “public charge” rules that impose adverse immigration consequences on non-citizens who use means-tested benefits.</p> <p>c. Proposed Rule Changes</p>

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951	USCIS-2010-0008-1027	Rachel Odio, Public Counsel	<p>Comment part 1: Via Electronic Submission Tuesday, November 27, 2018 Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 Re: Docket ID USCIS-2010-0008 Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria; FR Doc. 2018-21101; 83 FR 49120, 49120-49121 To Whom It May Concern:</p> <p>I write to submit Public Counsel’s comments on U.S. Citizenship & Immigration Services’ (USCIS) proposed revisions to Form I-912 and its accompanying instructions (USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018).</p> <p>Public Counsel is the nation’s largest pro bono law firm. We assist over 30,000 children, youth, families, and community organizations every year through ten program areas, including community development, consumer law, children’s rights, veterans’ advancement, homelessness prevention, and immigrants’ rights. We provide legal services to the most vulnerable members of our community, which we assess in part by income thresholds set by the California State Bar’s IOLTA (Interest on Lawyer Trust Accounts) funding guidelines.</p> <p>We oppose the proposed changes to the USCIS fee waiver form and instructions. USCIS proposes to remove the receipt of means-tested benefits from the eligibility criteria, reject applicant letters regarding inability to pay fees without a completed Form I-912, limit the types of documentary</p> <p>evidence that can be used to establish an applicant’s inability to pay fees and require each</p>

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961	USCIS-2010-0008-1039	Richard Spix	<p>Comments to Changes to Fee Waiver Application Proposed by USCIS.</p> <p>I am heavily involved in assisting LPRs in naturalizing in Orange County. I volunteer my time as an attorney to the community group for which the \$725.00 application fee presents an almost insurmountable burden. The group I volunteer with expends significant resources on the preparation of the N-400 only to have the applicant unable to mail it in because the fee is beyond the discretionary spending available to the applicant and his/her family. I have prepared many hundreds of fee waiver applications including I-912s and I-942s on all possible grounds allowed by current law.</p> <p>The Forms should expressly permit the use of a "Notice of Action" commonly sent to the applicant by the governmental agency administering the public benefits and not require only the use of a separately generated benefits letter that requires unnecessary work by both the agency and the applicant. A means tested benefit is expressly permitted by Federal Law to require that the USCIS "shall" grant a fee waiver.</p> <p>On a related documentation issue, requiring an IRS transcript of applicants imposes hardships beyond the benefits gained, if any. Numerous elderly clients that seek to become citizens have no access or knowledge of computers and accessibility to IRS websites. Keep in mind that these applicants are the most impoverished, those that do not even meet the floor for required filing of taxes. The proposed rule is just mean spirited.</p> <p>Requiring EACH applicant to submit their own form injects additional requirements without added benefit. If all members of the same household rely on the same evidence of eligibility for a fee waiver, they should be permitted to apply on the same form. There is no enhanced truthiness from additional duplicative paperwork. The policies of the paperwork reduction act should be implemented.</p> <p>Presently, each 8 hour volunteer that has been trained in Fee Waiver Preparation averages about 25 applications. I have reviewed the additional information and requirements of the proposed rules and believe that the number of applications per volunteer day will decrease substantially, to around 15. This leaves a heightened need for scarce volunteers or additional members of the eligible community unserved.</p>

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1043	USCIS-2010-0008-1161	Meon Yu	<p>I oppose the change put forth by DHS to complicate the USCIS fee waiver process. The proposed change to the fee waiver eligibility process is a terrible idea because it is a waste of resources. The means-tested benefit letter is a simple, cost-effective way for low-income immigrants to prove that they are eligible for the fee waiver. These letters are awarded by the state government agencies who are experienced in assessing income at the household level. If low-income immigrants are required to use their tax returns to demonstrate their eligibility, then their income status has to be verified a second time at the federal level. This is a completely wasteful and unnecessary allocation of taxpayer dollars, and as an American tax-payer, I object to such a wasteful expenditure of my tax dollars.</p> <p>Also, the proposed change creates additional time and resource burden on applicants. Many low-income immigrants are making minimum wages and their annual salaries do not meet the minimum income requirement to file for tax return. If the proposed change to the fee waiver eligibility process were in effect, these families would have nothing to prove their income eligibility, and therefore would not be able to apply for a fee waiver. Alternatively, they would file a tax return even when they are not required to, which results in unnecessary processing by the IRS that are wasteful of federal resources and manpower.</p> <p>It also wastes USCIS resources. For every I-912 that would be submitted on behalf of a family, living in the same household and submitting the same evidence, USCIS proposes to have each individual submit their own application. This wastes time, paper, ink and postage on the part of the applicants or their legal representatives. Reviewing each similar if not the identical application is a complete waste of immigration officer time. And rejected requests will mean paper and postage paid for by USCIS to return each application to the applicants. USCIS has not offered any indication as to why it would be more effective or efficient to have each household member submit their own form.</p> <p>This proposed change is absolutely unnecessary and wasteful, both of applicant time and resources, and USCIS time and resources. For this reason, I strongly oppose this change.</p>

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974	USCIS-2010-0008-1056	Leah Engle, Kentucky Equal Justice Center	<p>Comment part 1: Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Kentucky Equal Justice Center in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Kentucky Equal Justice Center is a non-profit poverty law advocacy and research center. Our mission is to promote equal justice for all residents of the Commonwealth by serving as an advocate for low income and other vulnerable members of society. We provide immigration legal services through the Maxwell Street Legal Clinic in Lexington, Kentucky.</p> <p>Maxwell Street Legal Clinic offers free or low cost advice and assistance with immigration law to low-income people and their families. Maxwell Street is a trusted community resource, and has been providing immigration assistance in Kentucky since 1999. We provide assistance with family-based and humanitarian immigration relief, including Violence Against Women Act (VAWA) petitions, U visas for victims of crime, T visas for victims of trafficking, Special Immigrant Juvenile (SIJ) status, Deferred Action for Childhood Arrivals (DACA) requests, Temporary Protected Status applications, family petitions, and naturalization applications. Our resources</p>

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1153	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 6: IV. The Proposed Form Change Places a Significant Burden on Individuals Applying for Naturalization and on Vulnerable Populations Applying for Immigration Benefits, Thereby Harming Them, Their Families, and Our Communities</p> <p>The proposal mandates that applicants for immigration benefits or naturalization who are unable to pay the prescribed fee use Form I-912 exclusively to apply for a fee waiver. The proposal further requires that each person in a family requesting a fee waiver submit their own I-912 form. These proposed changes would compound the restrictive effects of the points outlined above.</p> <p>A. The Proposed Requirement that Individuals Requesting Fee Waivers Use Form I-912 Is Unduly Burdensome and Conflicts With 8 C.F.R § 103.7(c)</p> <p>The proposed form change requiring exclusive use of Form I-912 to request a fee waiver impermissibly conflicts with 8 C.F.R § 103.7(c), which only requires a “written request” and not the use of any specific form. Beyond the fact that the proposed requirement contravenes the regulatory language, USCIS offers no explanation or justification for why it seeks to eliminate other forms of written requests. Not only is the mandate to use Form I-912 as the exclusive vehicle for requesting a fee waiver impermissible, it also lacks a necessary evidentiary basis and any rational connection to the goal of determining ability to pay. Were USCIS to refuse to consider applicant-generated requests for a fee waiver, it would place an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a selfgenerated request that provides all the necessary information can equally meet the requirements under 8 C.F.R. § 103.7(c). USCIS must continue to accept applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or a</p>

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1314	USCIS-2010-0008-1002	Peggy Russell, on behalf of Mid Minnesota Legal Aid (Legal Aid)	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I am writing on behalf of Mid Minnesota Legal Aid (Legal Aid) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Immigration Law Project at Legal Aid provides free legal services, largely full representation, to immigrants in Hennepin and Anoka counties whose net income is at or below 125% of the federal poverty guidelines. We prioritize assisting the most vulnerable immigrant populations, including refugees and asylees, survivors of domestic violence and sexual assault, those with serious medical conditions, and immigrant youth. The majority of our clients have incomes well below 150% of the poverty level and many of them receive means-tested benefits. We submit fee waiver applications in the vast majority of applications that we file as our clients usually are not able to meet their basic needs and are even less able to spend hundreds of dollars on immigration applications. Many of Legal Aid’s clients do not file a tax return because their income is less than the amount that requires the filing of a tax return.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications. I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a fee waiver to submit their own form. More troubling, the proposal narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver. These proposed changes will discourage eligible individuals from filing for both fee waivers and immigration benefits and place heavy time and resource burdens on individuals applying for fee waivers.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p>

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1242	USCIS-2010-0008-1159	Muhammad Akhtar, Chinese Community Center of Houston	<p>Comment part 2: The Proposed Changes Would Reduce Naturalization and Access to Other Immigration Services</p> <p>Unfortunately, by imposing additional burden on applicants, the entities that assist them, and USCIS and other state and federal agency staff, the proposed changes to the fee waiver application process would severely limit naturalization and impair the productivity of many foreign-born residents in Houston. We strongly oppose this threat to economic and social progress in Houston, TX.</p> <p>Receipt of a means-tested benefit is the most straightforward and the least labor-intensive method of proving inability to pay USCIS fees, because it leverages analysis that other government agencies have already completed of individuals' income and other relevant circumstances. Forcing fee waiver adjudications to instead consider extensive original documentation of the many factors that determine income or hardship will hinder applicants and slow USCIS's decision-making process, exacerbating the already-sizable backlogs of applications. Requiring submission of a Form I-912 and supporting documentation from every applicant – even those applying simultaneously with identically-situated family members – will have the same negative effects.</p> <p>We at the Chinese Community Center primarily serve a client base that is low income, in addition to many individuals who are retired. These individuals generally can qualify for means-tested benefits, and therefore use these as grounds for eligibility for a fee waiver. Their socio-economic status however does not stop these determined individuals from working their hardest to provide for their families and communities at large.</p> <p>In total, we are meant to serve fifteen or more clients per month, around eighty percent of this clientele requires a fee waiver, and ninety five percent of our fee waiver eligible clients use means-tested benefits to qualify for the fee waiver. By removing the permission for means-tested benefits, it would significantly impede our clients from applying for a fee waiver as the other methods of eligibility are significantly more difficult to attain.</p> <p>Every month, we hold two citizenship workshops where we provide one-on-one consultations with clients from a great diversity of backgrounds. With the change in the eligibility requirements for fee waivers, due to our current funding and amount of staff on hand, we would anticipate serving fewer people due to the increased hurdles during their application processes.</p> <p>As the hurdles to naturalization have increased over the years, we have seen a chilling effect on our primarily working and low-income class clientele, as they have increasingly, but unfortunately correctly come to see naturalization as the domain of the wealthy. This is completely antithetical to our core values as Americans, as the land of opportunity and freedom should not be akin to an exclusive club. We implore USCIS to remember the values that our nation holds so dear.</p>

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773	USCIS-2010-0008-1073	Miko Tokuhamas Olsen on behalf of Legal Aid Society of San Diego, Inc.	<p>Comment part 1: Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Legal Aid Society of San Diego to oppose the proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Legal Aid Society of San Diego is a 501(c)(3) non-profit agency which provides free legal services to the low income residents of San Diego County. By definition, therefore, most of our immigration clients are only able to file immigration applications with fee waivers. I have been practicing immigration law with LASSD for 23 years and have personally seen that the availability of a fee waiver is the difference between filing and not filing for most of our clients.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-912 to apply for a fee waiver, as well as each person in a family requesting a</p>

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1264	USCIS-2010-0008-1020	John Keller on behalf of the Immigrant Law Center of Minnesota	<p>Comment part 1: Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Immigrant Law Center of Minnesota in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Immigrant Law Center of Minnesota (ILCM) is the state’s largest provider of immigration legal, education and policy services to immigrants and refugees that come from over 110 countries every year. Annually we work on over 4,500 cases. We represent immigrants in all aspects of immigration law, from DACA and TPS, to U and T-visas, to family petitioning and naturalization, and from removal defense to consular processing. We are also a non-profit that works exclusively with immigrants and refugees that are at or below 187% of the federal poverty guidelines. Most of our clients are below 100% of the FPG. The state of Minnesota has historically been a state that has depended on immigrants as a significant source of population and workforce growth. Over the next several decades, several multi-disciplinary studies have concluded that Minnesota’s economic well-being will increasingly depend on its ability to keep every immigrant already in the state working and thriving but also we will need to grow the rate of migration to Minnesota by four and one-half times the current rate simply to maintain our current rate of economic growth. In short, ILCM and the work that we do to stabilize immigrant and refugee families is in the vital interest of the entire state, today and tomorrow.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>I. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed changes require individual applicants for immigration benefits to use Form I-942 to apply for a fee waiver, as well as each member of a family requesting</p>

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1335	USCIS-2010-0008-1007	Salvador Sanabria, Salvadoran American Leadership and Educational Fund	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

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1439	USCIS-2010-0008-1199	Cecelia Levin, ASISTA	<p>***Comment did not paste well*** Comment part 5: C. USCIS should continue to accept "Applicant-Generated" Fee Waiver Requests.</p> <p>The requirement that applicants must submit an I-912 in lieu of a declaration and supporting evidence that outlines the factors in the regulations runs counter to existing pattern and practice where an applicant could submit a declaration and/or other supporting documents to comply with the requirements indicated in the regulations at 8 CFR 103.7(c). USCIS should continue to accept applicant-generated "fee waiver requests (such as a letter, declaration or affidavit) that demonstrate an applicant or petitioner is eligible for a fee waiver.</p> <p>Eliminating this currently accepted form of request places an additional and unnecessary hardship on survivors to locate, complete, and submit the Form I-912. For prospective survivors, for survivors with limited English proficiency, as well as for service providers that work with a high volume caseload, the requirement of the I-912 is an unnecessary burden. The I-912 form itself is a complex eleven-page form, with eleven pages of instructions. It is often easier for survivors and those who serve them to use applicant-generated fee requests to demonstrate expenses and the reasons the applicant or petitioner is unable to pay the immigration fees.</p> <p>These applicant-generated forms of proof comport with the requirements of 8 CFR 103.7(c) and with the any credible evidence standard.</p> <p>USCIS's own guidance states that while the I-912 fee waiver application was created to help standardize requests, the use of a USCIS form is NOT mandated by regulation, so USCIS will continue to consider applicant-generated "fee waiver requests that comply with 8 CFR 103.7(c). 28 Moreover, the regulations do not specify that any particular form of proof must be used to show inability to pay, just that such a showing must be made. USCIS has not sufficiently justified its rationale for making the Form I-912 a requirement, nor explained how such a requirement complies with the any credible evidence standard.</p> <p>Furthermore, the proposed revisions require that each applicant and derivative family member submit separate fee waivers instead of one fee waiver submission for an entire family unit. Not only is this inefficient, but it also places an unnecessary burden on survivors and service providers.</p>

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1275	USCIS-2010-0008-1107	Omar Carrera on behalf of Canal Alliance	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax return to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are</p>

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1340	USCIS-2010-0008-1012	Julia Brown, Immigrant Legal Advocacy Project	<p>Comment part 3: C. This proposal will place a time and resource burden on ILAP’s clients applying for fee waivers.</p> <p>First, eliminating self-generated requests like letters and affidavits places an enormous burden on applicants to find the Form I-912, fill it out completely, and submit it. The proposed requirement conflicts with 8 C.F.R. § 103.7(c):</p> <p>(2)Requesting a fee waiver. To request a fee waiver, a person requesting an immigration benefit must submit a written request for permission to have their request processed without payment of a fee with their benefit request. The request must state the person's belief that he or she is entitled to or deserving of the benefit requested, the reasons for his or her inability to pay, and evidence to support the reasons indicated. There is no appeal of the denial of a fee waiver request.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This makes sense and simplifies the filing process. Families often have minor children, or involve couples applying for naturalization at the same time. This proposed rule would force families to generate a form for each individual, including the IRS transcript or verification of non-filing, and other documents. This is unnecessary duplication and an unnecessary burden on the applicants.</p> <p>Third, the proposed rule removes an individual’s ability to use his or her receipt of meanstested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a meanstested benefit is sufficient evidence of inability to pay, which is all that 8 C.F.R. § 103.7(c) requires. Nothing in the proposed rules shows where USCIS has granted a fee waiver to an individual, based on receipt of a means-tested benefit, who actually was able to pay the fee. At ILAP, we often use proof of receipt of a means-tested benefit. A client will provide us with an official eligibility letter from the agency administering the benefit. That agency has already</p>

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1444	USCIS-2010-0008-1200	Cindy Zapata, Harvard Immigration and Refugee Clinical Program	<p>Comment part 2: II. The Proposed Change places an undue burden on asylees, a uniquely at-risk and vulnerable immigrant population.</p> <p>The majority of HIRC’s clients are individuals who have come to the United States seeking asylum. By definition, an asylum seeker has fled his or her home country because of persecution or a well-founded fear of persecution on account of his or her race, religion, nationality, membership in a particular social group, or political opinion.⁶ Many asylum seekers suffer permanent physical or emotional disabilities as a result of their persecution, making them uniquely vulnerable. An asylum applicant who perseveres through the time-consuming, emotionally draining, and rigorous process of winning asylum eventually has the opportunity to adjust to LPR status.</p> <p>In order to adjust, however, asylees must submit the I-485 Application to Adjust Status, and either pay the costly fees associated with it, or apply for an I-912 fee waiver. Many of HIRC and HIP asylee clients are single mothers with one or more children who typically make minimum wage. The total fees, which include the I-485 application fee, plus an additional biometrics fee, add up to \$1,975 for a family consisting of a mother and a child who is under the age of 14. Thus, both HIRC and HIP represent asylees who depend on the I-912 fee waivers to cover the cost of their I-485 application fees. ers and requiring all applicants to independently prove either low-income or financial hardship places an undue burden on asylees who already qualify for means-tested benefits. In our experience the income-based fee waiver greatly increases the processing time of the application, forcing asylees to needlessly wait longer for their green cards. Many asylees have already waited years for their asylum applications to be adjudicated. Thus, the Proposed Change places an undue burden on asylees, who are both exceptionally vulnerable and deserving of fair and efficient adjudication of their applications.</p> <p>III. Conclusion</p> <p>For the reasons detailed above, USCIS should immediately withdraw their current Proposed Change and dedicate their efforts to changing policies that adverse their stated goal</p>

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1229	USCIS-2010-0008-0779	Melissa Mora, Neighborhood Defender Service of Harlem	<p>Comment part 3: B. By only accepting fee waiver requests submitted using the Form 1-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form 1-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible. Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the nonfiling from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together. Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the</p>

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966	USCIS-2010-0008-1046	Carmen Ramirez	<p>Comment part 1: November 27, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>We write to oppose changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests – as well as applicants, and the organizations that assist them.</p> <p>☐ ALRP provides pro bono and low cost legal services to people living with HIV/AIDS.</p> <p>☐ ALRP provides legal assistance with civil law matters, including immigration issues.</p> <p>☐ Our clients, the majority who are low-income individuals, use the fee waiver form to renew their Lawful Permanent Residency cards and Employment Authorization Document.</p> <p>☐ The unavailability of a fee waiver and means test to determine eligibility for a fee waiver would complicate and delay our client’s ability to renew their LPR and EAD cards.</p> <p>☐ Our experience is that the fee waiver and means test to determine eligibility for a waiver</p>

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730	USCIS-2010-0008-0984	Jean Lowe	<p>November 27, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>I oppose changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would require every member of a family applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests as well as applicants, and the organizations that assist them.</p> <p>As a University psychologist I work with immigrants who are seeking help for their sick and fragile infants and children. Often this requires stays in New Mexico for months to years to allow their family members to obtain life saving medical treatment. This type of a barrier would impose great burden on the family and risks to the medically fragile children.</p> <p>New Mexico and all of its residents depend upon USCIS to administer benefits fairly and efficiently. When the USCIS fulfills this important component of its mission, it helps our families, employers, and civic institutions thrive by ensuring that U.S. citizenship is open to all people who qualify under the law. The agency also honors our nations values when it recognizes that U.S. citizens and our communities benefit greatly from immigrants contributions, and access to visas, work permits, and naturalization.</p>

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734	USCIS-2010-0008-0975	Lakshmi Sridaran South Asian Americans Leading Together (SAALT)	<p>Comment part 1: November 27, 2018</p> <p>Submitted via www.regulations.gov</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket No. USCIS-2010-0008, OMB Control Number 1615-0116, Comments in Response to Proposed Rulemaking: Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of South Asian Americans Leading Together (SAALT), we offer comments in response to Docket No. USCIS-2010-0008, OMB Control Number 1615-0116. The proposed fee waiver application process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests – as well as applicants, and the organizations that assist them.</p> <p>South Asian Americans Leading Together (SAALT) is a national, non-partisan, non-profit organization that fights for racial justice and advocates for the civil rights of all South Asians in the United States.</p> <p>South Asian American Naturalization</p> <p>South Asians are one of the fastest growing immigrant populations in the United States. There are over 5 million South Asians living in the United States.¹ In FY 2017, over 10% or 75,535 South Asians were naturalized (8,629 Bangladeshi, 65 Bhutanese 4,509 Nepali, 10,166 Pakistani, 50,802 Indian and 1,364 Sri Lankan).² South Asian communities depend upon USCIS to administer benefits fairly and efficiently. When the USCIS fulfills this important component of its mission, it helps our families, employers, and civic institutions thrive by ensuring that U.S. citizenship is open to all people who qualify under the law. The agency also recognizes that U.S. citizens and our communities benefit greatly from immigrants.</p>

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736	USCIS-2010-0008-0739	Issa Ndiaye, West African Community Council	<p>Commpet part 1: We, at the West African Community Council, write to oppose changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests – as well as applicants, and the organizations that assist them.</p> <p>The West African Community Council aim to provide low-cost immigration services to the West African Community of Seattle and greater community. Many of our clients are those that would have extreme difficulty completing this additional</p> <p>Many West Africans believe in giving back and working for and with the community they are in. The additional cost of paying for Citizenship would make them choose between paying for necessary living expenses and improving their immigration status.</p> <p>Naturalization Will Benefit All Americans</p> <p>Our entire community and all of its residents depend upon USCIS to administer benefits fairly and efficiently. When the USCIS fulfills this important component of its mission, it helps our families, employers, and civic institutions thrive by ensuring that U.S. citizenship is open to all people who qualify under the law. The agency also honors our nation’s values when it recognizes that U.S. citizens and our communities benefit greatly from immigrants’ contributions, and access to visas, work permits, and naturalization.</p> <p>The West African Community Council helps individuals obtain their citizenship and green cards so that they can continue to work and provide a better life for themselves and their family. We advocate for this because we believe it is the right and responsible action to do in order to live in a more fair, diverse, and just society. Many of the people that we have served and who are a part of our community have gone on to establish better careers, economic advancement, and have given back as the United States as citizens. The Executive Director of our Organization himself, was an immigration who became a citizen, worked for the federal government and subsequently co-founded our non-profit.</p>

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750	USCIS-2010-0008-0742	Iveth Lopez, Chicanos Por La Causa	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>We, Chicanos Por La Causa, Inc. write to oppose changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests — as well as applicants, and the organizations that assist them.</p> <ul style="list-style-type: none">• Chicanos Por La Causa, Inc. mission is to drive economic and political empowerment. We are one of the largest nonprofit organization reaching out annually to 306,000 individuals. Our Family Immigration Program based in the rural area of Yuma County where majority of our clients are under the federal poverty guidelines. Our clients will be greatly affected by the delay to naturalize and/or obtain proper documentation of the renewal of their documents with the new implementation of the proposed changes to the fee waiver.• An average of 90% of our clients are able to renew documents and/or apply for naturalization with a rapid response from USCIS within 15-20 days after submitting their documentation.• In the last quarter, CPLC was able to assist 95 individuals in applying for naturalization with 64 fee waivers being completed and 4 reduced fee waivers. <p>Family Immigration and Naturalization Benefits All Americans Arizona and all of its residents depend upon USCIS to administer benefits fairly and efficiently. When the USCIS fulfills this important component of its mission, it helps our families, employers,</p>

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763	USCIS-2010-0008-1159	Muhammad Akhtar, Chinese Community Center of Houston	<p>Comment part 1:Dear Ms. Deshommes:</p> <p>We of the Chinese Community Center of Houston write to oppose changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests – as well as applicants, and the organizations that assist them.</p> <p>The mission of the Chinese Community Center (CCC) is to bridge East and West by enriching families with educational, cultural, and social service programs. CCC’s vision is to (1) create a continuum of core services that meet clients’ multidimensional needs at any stage of life; (2) help Greater Houston residents achieve financial stability and resilience; and (3) promote cultural understanding, education, and support for diverse populations.</p> <p>A central part of our work to uplift the communities we serve in Houston has been assisting many of our clients with the naturalization process. The Fee Waiver has been an indispensable tool in this regard as a great deal of the clients who come to us for naturalization assistance cannot afford the fee of the applying for citizenship, and specifically qualify through their means-tested benefits. Ever since we started providing naturalization assistance services over four years ago, more than eighty percent of the people we have served qualified for the fee waiver on the basis of their means-tested benefits. It is only because they were able to get the fee waiver, that these hard working individuals were able to achieve their respective American dreams.</p> <p>Naturalization Benefits All Americans</p> <p>Houston, TX and all of its residents depend upon USCIS to administer benefits fairly and efficiently. When the USCIS fulfills this important component of its mission, it helps our families, employers, and civic institutions thrive by ensuring that U.S. citizenship is open to all people who qualify under the law. The agency also honors our nation’s values when it recognizes that U.S. citizens and our communities benefit greatly from immigrants’ contributions, and access to visas, work permits, and naturalization. As a social services organization, the Chinese Community Center long since realized that naturalization is a key part of helping people become productive members of society. Citizenship is the first step in which our clients can truly economically, politically, and socially benefit our great nation.</p> <p>Perhaps the greatest example to come out of our community is Texas State Representative for the 137th District, Gene Wu. Since being elected State Representative, Gene has authored legislation reforming the criminal justice system, decriminalizing truancy, enhancing Pre-K standards, strengthening protections for victims of human trafficking, and improving college readiness. He has been honored to receive recognition for his work by organizations such as Sierra Club, Equality Texas, and the Texas District and County Attorneys Association. Now in his third term, Gene has been appointed to serve on the Appropriations Committee and the Human</p> <p>Services Committee. Gene is the epitome of what immigrants from our community are capable of when we provide them the opportunity to fully realize their</p>

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1308	USCIS-2010-0008-0926	Eli Cohen, New York City Bar Associations Immigration and Nationality Law Committee	<p>Comment Part 2: II. COMMENTS ON PROPOSED RULE</p> <p>These changes (a) will restrict access to fee waivers; (b) will disproportionately impact society’s most vulnerable immigrants; and (c) are unsupported by evidence that the changes are needed.</p> <p>a. The Proposed Rule Restricts Access to Fee Waivers</p> <p>Each of the changes in the Proposed Rule serves to restrict access to fee waivers by making the application process more burdensome for applicants. Without the ability to submit proof of receipt of means-tested benefits, fee waiver applicants will need to submit requests under the categories of “income” and “financial hardship” both of which require significantly more documentation.⁵</p> <p>Proving income is often difficult for people seeking fee waivers exactly because they often have no income or their taxable income is so low that they are not required to file tax returns.⁶ Meanwhile, USCIS’s criteria for the financial hardship category are not clearly defined and appear to involve a much more subjective analysis by a USCIS officer of an applicant’s income and expenses. Requiring applicants to provide additional financial information that could easily be demonstrated through statements provided by government entities that administer means-tested benefits unnecessarily shifts the burden to individual applicants to organize and compile additional income, resources, and expense information that may be difficult to obtain from unwilling third-parties such as employers, landlords, or financial institutions. This burden also may be greater for specific applicants, such as minor children, individuals with disabilities, the elderly, or the homeless. In addition, those who rely on means-tested benefits are precisely those most likely to be unable to afford an attorney to help them meet these new requirements. Although some of these applicants may be able to obtain the help of non-profit legal services organizations or pro bono attorneys, these services are already overburdened and do not exist in many parts of the country. Some free legal service providers have been able to assist immigrants to complete fee waiver applications in large-scale clinic settings where the immigrant can show proof of receipt of a means-tested benefit. These clinics provide invaluable assistance in allowing immigrants to seek naturalization or renew their green cards. The onerous documentation requirements for fee waivers under the Proposed Rule will likely make it impossible for non-profit organizations to offer large-scale clinics to those least likely to be able to afford lawyers.</p> <p>The other Proposed Rule changes—requiring applications from each household member and prohibiting beneficiaries from filing their own fee waivers—compound the problems of assembling documentation that would be caused by the elimination of a ground of fee waiver eligibility. In many cases, families would be submitting multiple sets of duplicate information that would have to be individually assessed by USCIS instead of filing together as a household in a streamlined single application.</p> <p>Finally, these concerns in compiling documentation will also adversely impact USCIS. For an agency already burdened with high backlogs and delayed processing times, there will be more applications to deal with requiring more careful consideration of proof permitted, instead of the more efficient method of relying on a government-administered eligibility process for determining eligibility for means-tested benefits and in turn for waivers.</p>

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9	USCIS-2010-0008-0156	Alexandra Olins	<p>I object to this rule change because it will hurt the most vulnerable people--those who cannot prove that they are low-income via their tax returns because they earn so little income that they are not required to file taxes. For these individuals, many of whom are elderly and/or do not work, it is very difficult thing to PROVE that they are low-income if they do not file taxes.</p> <p>Asking these clients to get a verification of non-filing from the IRS is a) time-consuming and confusing and b) does NOT prove that they are low-income. In other words, a client may go through the trouble of getting the verification of non-filing from the IRS, but this merely proves that they did not file their taxes, NOT that they are low-income. It becomes very, very difficult for those people that are not legally required to file their taxes to PROVE their income. For those people, a benefit eligibility letter used to be an easy, simple way to prove their low-income status. Now, it becomes almost impossible, if not outright impossible, to prove that they are low-income.</p> <p>This rule change would place an undue burden on our most vulnerable clients--those who are eligible for the fee-waiver, but can no longer prove it.</p> <p>As to the issue that the dollar amount of fee waivers granted by USCIS has increased over the past few years, I would ask what the problem is with that? Is the goal to limit the number of eligible people that are able to use the fee-waiver? If so, why? If they are low-income, they should be able to use the fee waiver, and there should be no problem with this. This increase in use of the fee waiver is most likely a result of more eligible people seeking to naturalize over the last two years, which is certainly the case. Therefore we would expect to see a commensurate increase in the number of fee waivers utilized as well. I fail to see how that is a problem that needs to be fixed.</p> <p>On a personal note, I need to renew my passport this year. If the passport renewal fee that I need to pay is increased by a small amount (which is all that would be required) in order to cover the increase in fee waiver applications, as a non-low-income individual, I am more than happy to pay more. There are no doubt hundreds of thousands of Americans that renew their passports each year. A small fee increase--spread among so many of us--is something that many of us would agree is a small price to pay to ensure that all low-income individuals that are eligible to access the fee waiver are able to do so.</p> <p>In sum, I would say that this rule change is a solution in search of a problem. No one who is eligible for public benefits in any state would be considered high or even moderate income in another state. We should seek to ensure that the most vulnerable and low-income among us have continued access to the fee waiver, without manufacturing artificial and unfair barriers to doing so.</p>

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274	USCIS-2010-0008-0434	Paula Forero	<p>I strongly oppose the proposed change of no longer using means-tested public benefits to gauge whether someone deserves a USCIS filing fee waiver. This will disproportionately impact people of color and low-income people. It will discourage them from filing for immigration benefits because it raises documentation barriers that are hard to overcome. For instance, asylees may apply for a greencard after one year in asylum status. They are a category of immigrants who can file for an adjustment of status fee waiver. Since they are allowed to receive public benefits b/c there's no public charge requirement for them, they already have on hand a public benefits letter. It's easiest to file for a fee waiver using that form. In their first year after asylum many asylees are still struggling to obtain self-sufficiency and are below poverty level. They may not have filed taxes yet or may not be obligated to file taxes because they're not working, are underage, are underemployed and are not legally obligated to file taxes. Asking them to get verification of non-filing through the IRS is an extra burden for them and will delay them from filing for adjustment. It may discourage them from trying altogether. Which inevitably delays them from obtaining full protection of their civil rights which is when they become US citizens.</p>

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308	USCIS-2010-0008-0459	Stella Chao	<p>USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason. This includes many elderly who have some of the lowest incomes and are not required to file tax returns and use other methods of income verification.</p>
397	USCIS-2010-0008-0585	Tagoipah Mathno	Due to historical process of applying for fee waivers people will not know the process based on this policy and will not realize that they need to file a tax return.
411	USCIS-2010-0008-0580	Donna Quach	<p>This new fee waiver policy that requires low income folks to file income taxes creates another barrier especially when their household income does not require them to file taxes. Additionally families that receive state and federal benefits likely do not have resources to pay for services to file their income taxes.</p> <p>Regards, Donna</p>

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744	USCIS-2010-0008-0746	Sarah Sumadi, OneAmerica	<p>I have worked or volunteered at more than 60 naturalization application preparation workshops in different cities in Washington State since 2013, and filled out at least a dozen I-912 fee waivers, some based on income below 150% of the federal poverty guidelines, and some based on receipt of means-tested benefits.</p> <p>This change is unnecessary and unjustified - the benefits granting agencies have already done a thorough income verification when granting the benefit. I urge you to continue to accept evidence of receipt of a means-tested benefit as grounds for fee waiver eligibility.</p> <p>I'd also like to address the regulation's proposal to require income and wage transcripts from the IRS in place of tax returns for an income-based fee waiver. This is absurd. In order to obtain a tax or wage transcript online, you have to have a credit card, a vehicle loan or a mortgage for identification purposes. The vast majority of low-income applicants we serve do not have any of those things, and would have to request their transcript by mail, which takes 5-10 business days. Our service model means that we can effectively serve anyone who comes prepared to a one-day workshop. For someone who is eligible, we can screen them, complete an N-400 and I-912 successfully in anywhere from 3-6 hours. However, this rule will make it virtually impossible for most people who are eligible for an I-912 to successfully obtain every piece of income documentation to bring to one of our clinics.</p> <p>The only type of person who would be able to come prepared is someone who:</p> <ol style="list-style-type: none">1. Was required to file taxes2. Filed taxes3. Successfully obtained their IRS tax transcript online or at least 10 days before the workshop by mail4. Had no changes to their situation since they filed their taxes. (They have the same job, same income level, same family size, no marriages or divorces, and same address). <p>If someone meets all of these conditions, that likely means their IRS tax transcript will be sufficient to prove income (if they are able to get the transcript, of course, given the logistical challenges I describe above)</p> <p>However, it is EXTREMELY unlikely that all of these circumstances will come together perfectly. Most people will need ADDITIONAL documentation beyond the tax transcript, because their situation has changed. Nearly everyone experiences changes in their lives - a child is born, getting married or moving, losing a job or getting a new job, starting school or finishing school. The documentation that USCIS requests in addition to the tax transcript, which would be required for people to have</p>

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802	USCIS-2010-0008-1162	Chelsea Edwards, Justice at Work	<p>Commment part 1: Dear Ms. Deshommes:</p> <p>On behalf of Justice at Work and our clients, I am submitting this response to “U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions” published in the Federal Register on September 28, 2018 (hereinafter “proposed revisions”). These proposed revisions relate to Form I-912; Request for Fee Waiver and accompanying memoranda.</p> <p>Our legal aid organization works directly with immigrant survivors of workplace sexual violence, exploitation, and human trafficking. Immigration representation for these clients—especially applications for T and U Visas—is a crucial part of giving them the security they need to report the violence committed against them to law enforcement authorities and regulatory agencies. Fee waiver for ancillary forms are an essential part of that relief, since the unlawful and financially exploitative actions of these clients’ former employers and traffickers make them unable to pay fees and unable to provide documentation of their income.</p> <p>Given our mission and our work, we stridently oppose these proposed revisions to the I-912 fee waiver application and instructions as well any corresponding changes to the USCIS Policy Memorandum, PM-602-0011.1. We call on USCIS to withdraw the proposed revisions to the fee waiver form and USCIS memoranda and instead, to develop policies and procedures that ensure that immigrant survivors of violence have equal access to critical, life-saving protections.</p> <p>The proposed revisions will cause significant additional burdens for immigrant survivors of sexual violence, exploitation, and human trafficking, as well as for the service providers that assist them. The financial insecurity of our clients is the primary means of control by exploitative employers and traffickers, and fee waivers for ancillary-forms like work permits and waivers are essential to giving them the immigration relief they need to escape the situation and cooperate with law enforcement to prevent such violence from continuing. The proposed revisions regarding additional documentation like tax transcripts or a verification of non-filing from the IRS to demonstrate an applicant’s income is under 150% of the poverty guidelines is overly burdensome for survivors and taxes the already-limited resources of legal aid organizations like our own that serve these clients. We serve those who cannot even afford legal representation, and adding this additional burden will significantly lower the number of those clients we are able to represent because we will be forced to spend our time gathering income evidence, preparing affidavits of clients and witnesses regarding income, and preparing separate filings and legal arguments regarding fee waiver eligibility. Moreover, it will further burden the U.S. government since we will be forced to spend time on activities like requesting documentation from federal agencies and appealing denials of fee waiver requests.</p>

ID	Comment.	Commentor	Comment
1190	USCIS-2010-0008-0998	Julie Pasch, Houston Immigration Legal Services Collaborative	<p>Comment part 5: Not All Immigrants Can Obtain Transcripts of Their Tax Returns or A Verification of NonFiling Letter</p> <p>The requirement that fee waiver applicants using income below 150% of the federal poverty guidelines to qualify submit either copies of their tax transcripts or a verification of non-filing letter is extremely burdensome and will place some immigrants in an impossible situation. There is no reason why a copy of an applicant's tax returns, the current evidence required,, is insufficient. Most individuals retain copies of this document and will not need to request additional copies from the IRS, whereas a tax transcript is not something most individuals have on hand.</p> <p>In order to request transcripts, applicants must have their Social Security numbers or Individual Tax Identification Numbers (ITIN).16Not all applicants for fee waivers have a Social Security number or ITIN. For example, many U visa applicants, who request fee waivers for the 1-192 Application for Advance Permission to Enter as Nonimmigrant, do not have Social Security numbers or ITINs. Furthermore, this requirement will significantly burden survivors of domestic violence, who cannot obtain these transcripts without their spouse's consent17or having them sent via mail to the address on fi1e18, which is likely to be the residence they shared with the abuser.</p> <p>Even applicants who are not survivors of domestic violence may have difficulty obtaining transcripts or verification of non-filing. They may not have a credit card, mortgage, home equity loan, or other loans, which are required to obtain a transcript online.19They may also not have access to the mail at their address at the time of filing, which is required to obtain a transcript through the mail.zo</p> <p>In addition to burdening the applicant, this requirement will also burden the IRS. USCIS's own estimates indicate that about 350,000 applicants use the fee waiver form every year. If all those applicants were forced to obtain documentation from the IRS, the IRS would be required to process more than 1,300 requests each business day. This is an enormous burden on the agency, and allowing applicants to qualify based on the receipt of means-tested benefits or by using copies of</p>

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1281	USCIS-2010-0008-1068	Peter McGraw, Texas RioGrande Legal Aid	<p>Comment part 3: 3. USCIS’s proposal will lead to fee waiver eligibility determinations that are arbitrary and capricious.</p> <p>Agency rules are arbitrary and capricious where the agency “relie[s] on factors which Congress has not intended it to consider, entirely fail[s] to consider an important aspect of the problem, offer[s] an explanation for its decision which runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view of the product of agency expertise.” Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29, 43 (1983). USCIS’s proposal hinges eligibility for fee waivers on the submission of particular documentary evidence that may be neither necessary nor sufficient to prove an individual’s inability to pay. Whether an individual has filed a tax return or is able to obtain a tax transcript is not dispositive of their ability to afford a fee. In fact, applicants may be able to easily obtain more probative documentary evidence of their income like pay stubs or declarations from family members that more accurately portray their current ability to afford a fee waiver. In situations where an individual provides sufficient proof of their inability to pay but is unable to obtain required documentation from the IRS, fee waiver denials would run counter to the evidence before the agency.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge users, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization.</p> <p>Respectfully, & ~OG~:rLAID, me Peter Me~ pmcgraw@trla.org Alien Liaison</p>

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1286	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 4: The documents necessary for an 1-912 based on income or hardship are challenging, if not impossible, for certain applicants to obtain.</p> <p>The proposed rule ignores the reality that many fee waiver applicants are not required to file tax returns, so the documents needed to support an income-based application are not readily available. Since the income-based ground explicitly requires a tax return, many individuals will be forced to qualify under the poorly-defined hardship ground or just give up, which means paying a filing fee they cannot afford or deciding not to apply.</p> <p>Many low-income applicants do not work, or do not earn enough that they are required to file a tax return. Individuals who are single, under 65 and not blind, are exempt from filing if their earned income is less than \$12,000 (or \$400 for self-employment income). For those over 65, the threshold is slightly higher, \$13,600. For married individuals filing jointly, the minimum income ranges from \$24,000 to \$26,600, depending on the ages of the spouses. Many NCP clients are not required to file taxes due to their low incomes. Many NCP clients are retired elders (173 new participants in 2017 over age 65), and many are disabled and unable to work (150 N-648 disability waivers filed in 2017).</p> <p>One of the larger agencies in NCP, which houses a separate program to assist clients in filing their taxes, explains that the additional burden—even with in-house tax help—would still be significant. "[W]e help clients to file income tax, or the clients do it by themselves. Most likely, these type of clients belong to the most vulnerable group, they can't find a way to file tax. At the end we have to do it for them. Based on my experience, we might have to write a letter to explain how the clients support themselves with ZERO income too. If it is rejected, we have to find other ways. So from a service provider's view, it would double or triple our time, plus explaining to the clients."</p> <p>For clients who do not file income taxes, the only clear proof of non-filing is a "Verification of Non-filing Letter" provided by the IRS. The request for this letter may be submitted online only if the individual has previously filed taxes; otherwise it must be done via regular mail. This letter only shows that the client did not file a federal tax return in a certain year—it does not verify their income or confirm that their income level exempted them from having to file a tax return. Clients who provide this letter in lieu of</p>

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1318	USCIS-2010-0008-0950	Brian Schaeffer on behalf of the Refugee and Immigrant Center for Education and Legal Services (RAICES)	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers. By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals keep copies on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail. One aspect of particular concern is working with those of no income. In many cases proving a negative is nearly impossible. For instance, over the years I have</p>

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1377	USCIS-2010-0008-1053	Michael Santomauro DePaul University Asylum & Immigration Law Clinic	<p>Comment part 4: IRS Verification of Non-Filing Request Is an Unreasoned Evidential Departure</p> <p>Proposed changes to the instructions for the USCIS Fee Waiver Request, Form I-912, signify an unreasoned departure in evidential requirements for fee waiver requests. Currently, the Form I-912 instructions provide on page 7:</p> <p>If you do not have any income, financial support, or cannot provide evidence of income, describe your particular situation that you believe qualifies you for a fee waiver in Part 5., Item Number 9. If available, you may submit affidavits from, for example, religious institutions, nonprofits, community-based organizations, or similarly recognized organizations, indicating that you are currently receiving some benefit or support from the organization verifying (or attesting to) your situation</p> <p>The proposed instructions read:</p> <p>If you do not have any income, or cannot provide proof of your income, describe your particular situation in detail in Part 3., Item Number 9., and submit a Verification of Non-filing from the IRS. Also, if applicable, submit affidavits from religious institutions, non-profits, or community-based organizations verifying that the applicant is currently receiving some benefit or support from that entity and attesting to the applicant's financial situation. This new requirement presents an additional obstacle for individuals already challenged by lack of resources and is inapposite to the USCIS stated reasoning for changing the Fee Waiver Request, Form I-912. To obtain a verification of non-filing from the IRS requires an individual to have sufficient resources, such as internet access or funds to hire a tax professional. Those needing to seek a fee waiver may not have ready access to such resources. In fact, the fee waiver itself acknowledges such resources are wanting. Further, according to the IRS, a verification of non-filing letter does not reflect whether a person had or did not have an obligation to file taxes.</p> <p>Thus, the USCIS is incapable of assessing an applicant's ability to seek assistance of this</p>

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450	USCIS-2010-0008-0538	Crisann Brooks	<p>It is unconstitutional to ask for documentation for a benefit that an individual should receive and now will not receive due when they can not produce the documentation that they now need to provide. It certainly seems as if the Federal Government or the Executive Office of the Federal Government is just finding ways to impede refugee's and immigrants from becoming US Citizens if they are not wealthy upon coming into the US. It takes time to become independent in a new country and sometimes one may never be. We have accepted them and we, America, should accept them completely and help them feel as they belong to their new country.</p> <p>I would like to know the answer of what documentation other than tax documentation a low income person can show if it is not their benefit papers and they don't report taxes because of any circumstances that allow them to not file for that year.</p> <p>Please let me know and the rest of the country know how we will be able help our fellow Americans file to legally become American Citizens and what documentation besides tax returns will be allowable.</p> <p>I do hope you have thought that far in advance. If not it will be just like the undocumented and how you separated parents and children without giving an order thought and just implementing it and dealing with horrible circumstances later. Why would we want to go that route.</p> <p>America is better than that, aren't we?</p>

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455	USCIS-2010-0008-0595	Vinson Wong	I strongly oppose the proposed change. My parents came to the US as immigrants, and they worked extremely hard to start a new life here from scratch, raising a family, and contributing to this country. I imagine that it's the same for many immigrants who came to the US. This country was built on immigration, and I would hate to see it get weakened by making it harder for low income immigrants to become US citizens because of the financial burden. Using someone's tax return to determine their eligibility is not a good indicator of their income status, as it only reflects their previous year's income. Plus, not everyone is required to file federal income taxes, so this change would make it impossible for them to prove their income and apply for the fee waiver. Eliminating a currently verified method of proving income would just create more confusion, delays, and wasted time/money. We should not prevent perfectly qualified individuals from becoming citizens because of an unnecessary change.
508	USCIS-2010-0008-0649	Tim Fogh	I am opposed to the proposed change to the fee waiver eligibility for the application for citizenship. The proposed change makes it impossible for poor applicants who do not have income tax returns. Those who are low income are not required to file an income tax return. If a person's work situation changes such that they are now low income, that person would have to wait until the following year's tax year to file a tax return showing their eligibility for a fee waiver. This proposed change effectively closes the door to poor immigrants and is an insult to our heritage.
415	USCIS-2010-0008-0546	Giulia Pasciuto	I oppose the proposed revision because lowest income immigrants rely on the existing accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating existing verification methods and making it harder for fees to be waived for their citizenship application.

ID	Comment.	Commentor	Comment
506	USCIS-2010-0008-0638	Jessica Valdez	<p>I oppose the proposed revisions to the fee waiver eligibility process. The changes USCIS proposes will make proving eligibility for the fee waiver much more difficult for people who cannot afford the application fee to become U.S. citizens. The proposed revisions would also impact other immigration-related applications such as green card renewals, work permits, and certificates of citizenship for children. The proposed change is unjustified, needlessly complex, and counterproductive.</p> <p>This is an unjust proposal that severely limits the ability of our low-/no-income immigrant communities to prove that they are eligible for the fee waiver to an annual tax return document. Many low-/no-income immigrants who are eligible for the fee waiver are not required to file taxes, and many choose to not file due to how culturally and linguistically inaccessible the tax filing process is for many immigrant communities. Even if low-/no-income immigrants choose to file their taxes, their tax returns only reflect income from the year prior to filing meaning if there is a major financial change (i.e. losing a job), then immigrant applicants have no way of showing evidence of this and proving their eligibility until filing taxes the following year. With the immense amount of time required to go through citizenship or other status change processes, low-/no-income immigrants trying to apply for citizenship (or green cards or work permits) cannot afford to depend solely on their annual tax return to prove that they are eligible for the fee waiver, as this does not allow them to present timely and accurate reflections of their eligibility.</p> <p>I urge USCIS to withdraw the proposed revisions to the fee waiver eligibility process.</p>

ID	Comment.	Commentor	Comment
398	USCIS-2010-0008-0599	Christina Guros Pena	<p>The proposal by US Citizenship and Immigration Services (USCIS) to change the fee waiver process is unnecessary and will discourage individuals and families from applying for immigration benefits.</p> <p>I work to expand access to free naturalization legal services in the Seattle area by coordinating citizenship application assistance events. For these events we ask potential applicants to bring both letters that show they receive public assistance and their federal income tax returns, to potentially assist them with the fee waiver application. Applicants who have their public benefits letter are easily assisted with the fee waiver, and their fee waiver applications are rarely denied. If applicants on public assistance did not bring their benefits letter but can show us other evidence they receive benefits, such as their Apple Health card, we can complete their fee waiver at the event and instruct them to insert a copy of the letter before filing the application.</p> <p>Applicants who do not receive public assistance have a more difficult time. First, they often do not have with them a copy of their income tax return, and so must request this from the IRS. Without their income taxes, we cannot assist them at the event, and must ask them to return to a future clinic. This represents for them a significant delay in their opportunity to apply to naturalize. For those who have some proof of current income, we can complete their fee waiver and instruct them to insert their last years taxes before filing, but these individuals are often confused about what to include from their tax return packet, and either return to a future event or are discouraged from applying. Even for those who have all evidence of last years tax filing and proof of current wages, their fee waiver applications are more often denied. This means they will again return to a future clinic or will be frustrated or fearful about the denial and will stop pursuing naturalization.</p> <p>USCIS is proposing to put all immigrants in this situation, by eliminating the option of proving low-income status through submitting proof of receiving public assistance. Those who do not file taxes because their income is too low or based on receipt of Supplemental Security Income or other assistance that does not count as taxable income, would now be asked to file tax returns unnecessarily, and would also be subject to the same negative experiences as those who have already had to file for a fee wavier based on proof of income. To make matters worse, those who are reliant on public benefits as proof for the fee waiver process, more often fall into vulnerable categories, such as elderly or disabled. USCIS proposes to make the most vulnerable immigrants and refugees work twice or event three times as hard to prove they are vulnerable.</p> <p>Beyond the sheer difficulty of applying for an income-based fee waiver, especially in a clinic setting, this change will discourage many families from pursuing naturalization and other immigration benefits in the first place. Many individuals sum up the courage to ask about their eligibility for immigration benefits in the first place because they have heard there is an option to have the fees waived. Naturalization is a daunting undertaking and the idea that an individual may have the option</p>

ID	Comment.	Commentor	Comment
456	USCIS-2010-0008-0560	Johanna Martinez	<p>I strongly oppose the changes to the fee waiver regulations because this change would make it unduly harder for those individuals who are unemployed to prove that they cannot afford to pay the fee. I know a 60-year old gentleman who wants to apply for citizenship. He does not have food stamps or use any benefits because he does not want to rely on the government. However, he does have health insurance. Although he has been unemployed for years, he does not rely on any food stamps or cash assistance of any type, but due to his lack of income, he does not file taxes.</p> <p>If these changes take into effect, it would make it harder for him to prove his eligibility. This new rule change would make it difficult for low-income individuals to access a benefit that should qualify for, such as Citizenship. This change would make it incredibly burdensome for those individuals to prove.</p> <p>This would not only increase the burden to the applicant, but also the burden to the government in addressing eligibility. The state's means-tested benefit should be sufficient.</p>

ID	Comment.	Commentor	Comment
698	USCIS-2010-0008-0803	Vasanthi Pillai	<p>I am writing to oppose the fee waiver eligibility changes in FR Doc. 2018-21101 filed 9-27-18.</p> <p>I currently work with immigrants and have previously volunteered at workshops to help refugees fill up naturalization and fee waiver paperwork. The proposed changes impose a burden on immigrants seeking fee waiver and naturalization. Naturalization is one of the forms eligible for fee waiver and the proposed changes will affect the vulnerable poor population seeking naturalization.</p> <p>Additional Burden on Applicants:</p> <p>The proposed changes require each individual in a family to submit an application. Previously the family could submit one application. Also, the changes make it compulsory for Form I-912 to be submitted instead of other forms of requests previously permitted, such as letters or affidavits. This imposes a burden on applicants. It makes the fee waiver application process more complicated for lay persons and there will be more mistakes and confusion.</p> <p>The proposed changes are being characterized as reducing the evidence required for Form I-912 to only a persons household income and no longer needing evidence of whether the individual receives a means-tested benefit. The actual effect of the reduction of evidence does not benefit the applicant, but instead imposes a higher burden on the applicant. Applicants who receive means tested benefits have already been vetted by a State government agency. The means tested benefits have also been defined and does not cover every assistance. The applicant receiving such a benefit would have a letter documenting that he or she qualifies for a means tested benefit. A person who receives a means tested benefit will have no difficulty submitting this letter in support of a fee waiver application.</p> <p>However, the new requirement is that the applicant should submit a Transcript from the IRS and not even a Federal Tax Return, which the applicant would likely have a copy of, if he or she had filed one. If they have not filed tax returns, they would have to file Form 4506-T with IRS to obtain a Verification of Non Filing. This adds another step to the process and imposes an unnecessary burden on the applicant to obtain these forms from IRS. It has no practical utility.</p> <p>The changes would make it more complicated for low income immigrants to seek to naturalize, given the prohibitive fees and will have a chilling effect.</p> <p>Additional Burden on Agencies:</p>

ID	Comment.	Commentor	Comment
376	USCIS-2010-0008-0523	Christina Guros	<p>I passionately oppose the proposed change to the fee waiver procedures for US Citizenship and Immigration Services (USCIS) because it will cause more fear within immigrant and refugee communities.</p> <p>The proposed fee waiver rule change will cause fear in two ways. First it will cause fear among immigrants who lawfully receive public assistance. The leaked public charge rule change has caused immigrants of all statuses to disenroll from public benefits programs across the country. Immigration legal service providers in the Seattle area have noticed an increase in calls from current, former and prospective clients since March 2018 about whether they should disenroll from benefits to protect their immigration status. Lawful permanent residents with over five years of residency, refugees, and naturalized citizens, all people who would not be subject to any changes to the public charge determination, make up a bulk of these callers.</p> <p>The proposed changes to Form I-912 would only exacerbate this climate of fear. The elimination of public assistance as an option to prove financial need will further convince applicants that receiving benefits is wrong or will get them in trouble, even though this is false. This rule change, unlike the public charge rule change, will also affect refugees and other immigrants who would never be the subject of the public charge determination; these protected categories of immigrants will now receive the message from immigration that their receipt of public assistance is not recognized as legitimate. This negation by USCIS will further convince immigrants that they should not access life-saving assistance.</p> <p>Second, the proposed fee waiver rule change will increase the fear caused to applicants due to a rejected fee waiver application. Applicants for immigration benefits often confuse a fee waiver denial with a denial of their entire application. This can cause an enormous amount of distress, especially when the benefit for which a person is applying is necessary to their ability to stay in this country.</p> <p>The proposed change will inevitably cause more fee waiver denials among applicants who rely on public assistance and have no other proof of income. Applicants who receive these denials are sometimes difficult to convince that the fee waiver denial will not cause them further trouble with the underlying application. Indeed, this is harder to argue against when fee waiver-based applications seem to take much longer than those filed with the fee. Advocates will need to spend even more time reassuring applicants they will not be punished for resubmitting a fee waiver and trying to convince them not to give up on the process altogether out of frustration and fear.</p> <p>In the current climate of fear among immigrants and refugees, including that which surrounds the proposed change to the public charge determination, this fear within</p>

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716	USCIS-2010-0008-0821	Louis Horn	<p>See attached file, here is the first part of my comment:</p> <p>I am commenting against the proposed revision to the current fee waiver policy. The revision would force an unnecessarily heavy burden on the applicant to prove inability to pay as required by the statute (8 CFR 103.7). Furthermore, there are enormous discrepancies between the revision itself and the accompanying USCIS press release that surely invite legal scrutiny. Both texts muddy the objective of the revision and fail to explain why the proposed revision would be beneficial to USCIS customers or US taxpayers at large.</p> <p>Burden on Applicants</p> <p>The new revision clearly burdens fee waiver applicants by limiting the types of documents that prove an applicants inability to pay. By removing the eligibility for people who receive means-tested benefits, the only way to qualify for a fee waiver would be to submit a federal income tax return. Of course low-income people who could possibly qualify for a fee waiver would be among the least likely to file an income tax return since many of them would not be required to file under tax law. The minimum income for a person to be required to file a federal income tax return is as follows:</p> <p>Single filing status: \$10,400 if under age 65 \$11,950 if age 65 or older</p> <p>Married filing jointly: \$20,800 if both spouses under age 65 \$23,300 if both spouses age 65 or older</p> <p>Since low-income people under these minimums do not have to file income tax returns, many do not opt to. This leaves otherwise qualifying applicants with no evidence supporting their fee waiver requests. The proposed revision would leave these applicants who meet the statutory definition of inability to pay without any way of qualifying for a fee waiver request.</p> <p>Lack of Inclusion of Verification of Non-Filing the Proposed Revision</p> <p>The USCIS press release accompanying the publishing of the proposed revision stated that under the revision, applicants could submit a verification of non-filing income tax as proof of their income. However, the proposed revision did not make any reference to using a verification of non-filing as proof of inability to pay. Since the current guidance also makes no reference to a verification of non-filing, it seems very important that the proposed revision state that verification of non-filing can be used as proof of inability to pay. A revision that does not include verification of non-filing in its guidance would be incomplete and also completely flawed as a</p>

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1273	USCIS-2010-0008-1037	Casey Sherman, Colorado Legal Services	<p>Comment part 2: Eliminating this ground for waiver will have a detrimental effect on our clients</p> <p>People experiencing homelessness do not have access to the everyday items we often take for granted.⁹ Many of our transient and housing instable clients do not file taxes regularly. This can be for a variety of reasons, including but not limited to lack of employers withholding taxes, earning below the filing minimum, access to an affordable tax preparer, or ability to retain essential tax documents such as W-2s long enough to file. Our clients also face difficulty accessing previous years' filings in a reasonable timeframe.</p> <p>It is also difficult to accurately explain the financial circumstances of such individuals in terms adjusted gross income. Homelessness can be episodic, and is exacerbated by lack of documents one requires to procure housing or employment. Someone who has lost their I-551 cannot obtain new housing or employment until they have replaced that vital document.¹⁰ Many of our clients previously had stable housing and employment, but their lives were disrupted by lack of documentation and the inability to afford replacement documents. Previous years' tax returns would not provide an accurate depiction of that person's current financial circumstances.</p> <p>USCIS can rely on other governmental agencies doing their due diligence in ascertaining financial eligibility for the benefits they administer. There is not as large a discrepancy in eligibility as this proposed change would suggest. For many clients, documenting receipt of public benefits is the fairest, most accurate, and most direct method for demonstrating their current financial circumstances.</p>

ID	Comment.	Commentor	Comment
1284	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 2: The proposed rule change would create an unnecessary paperwork burden for low-income lawful permanent residents attempting to become U.S. citizens.</p> <ul style="list-style-type: none">•When conducting outreach in advance of an NCC citizenship clinic, the current process of informing fee waiver eligible attendees what supporting documentation to bring is relatively straightforward. We•inform applicants who receive a means-tested public benefit to bring to the clinic what is called a public benefits letter. For many of our clients, this document is a simple piece of evidence that they already have or can easily obtain in a short amount of time. For those who fail to bring a benefits letter to the clinic, a fee waiver request can still be completed with instructions to insert the benefits letter before mailing in the application packet on their own. <p>In contrast, providing proper documentation for an income-based fee waiver is already difficult in the clinic setting. All applicants are asked to bring with them their most recent tax returns and recent pay stubs, but most applicants do not bring sufficient documentation because these items are more difficult to collect. Without sufficient proof of income, volunteer attorneys may be unable to complete their fee waiver request and will ask applicants to return to a future clinic with more evidence. Applicants who complete income-based fee waivers at a clinic despite missing evidence are sent home with instructions to include further documentation before filing their 1-912; these applicants are often overwhelmed and uncertain about what to include and usually do not complete the process on their own. Instead, they usually return to a future clinic, or become discouraged and do not pursue naturalization. Even clinic attendees who do bring adequate documentation of income often have their fee waiver requests rejected by USCIS and either return for additional assistance at a future clinic or give up on the process. We have considered avoiding income-based fee waivers at our clinics because of these difficulties. If the proposed rule becomes final in its current form, preparing an income- or hardship-based fee waiver request would become even more difficult and time-consuming. The new income-based fee waiver request would require all applicants to submit the most recent year's tax return, plus recent pay stubs of any individual who contributes to the household income. Applicants who file an income-based fee waiver request are often overwhelmed by the documentation needed to establish eligibility. They</p>

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1300	USCIS-2010-0008-0929	Wendy Wylegala, Kids in Need of Defense (KIND)	<p>Comment part 2: II. The Proposed Revisions Would Reduce Applicants’ Options for Demonstrating Eligibility for a Fee Waiver</p> <p>Under previous policy, an applicant could demonstrate eligibility for a fee waiver using any of three alternative tests: receipt of a means-tested benefit³, household income level, or financial hardship. See, e.g., 2011 Policy Memo at 2. The Proposed Revisions “will not permit a fee waiver based on receipt of a means-tested benefit,” 83 FR 49121. By stating that the Proposed Revisions “would reduce the evidence required for Form I-912” and will “no longer require proof of whether or not an individual receives a means-tested benefit,” id., the Federal Register notice misleadingly implies a beneficial change that would relieve applicants of a common burden. In reality, this proposed change would foreclose a pathway previously available to a limited number of applicants. In so doing, it would inflate documentation requirements, and decrease adjudicatory efficiency, all without addressing any demonstrable limitation in the current adjudication policy.</p> <p>As described above, documentation of income level or financial hardship may not be readily available to children and youth, particularly those who are unaccompanied. By channeling all fee waiver requests into those two categories only, the Proposed Revisions would make both application and adjudication more labor-intensive, which in turn will increase processing delays and backlogs beyond current levels.</p> <p>In contrast, under the 2011 Policy Memo, a fee waiver request may be supported by “a letter, notice, or other official document(s)” naming the benefit, the agency granting the benefit, and the recipient. 2011 Policy Memo at 5. Eliminating this basis for the fee waiver request will effectively increase the burden of documenting and reviewing eligibility, and reduce the likelihood of success for some applicants, without any showing that it could serve to curb fee waiver approvals for applicants capable of paying.</p> <p>Further, the proposed change would sacrifice efficiencies available under the current policy. A fee waiver applicant who has received a means-tested benefit has already satisfied screening requirements for that benefit, obviating the need for a new screening in the fee waiver adjudication process. Rather than utilizing the results of state-specific expertise, the Proposed Revisions reject this method on the basis of “inconsistent income levels being used to determine eligibility for a fee waiver,” 83 FR 49121. The regulatory standard of “inability to pay” is not confined to income levels or recent hardships, but may encompass factors such as the cost of living or the significant burdens associated with pregnancy, early childhood, disability, or old age. The receipt of a means-tested benefit may reflect these factors more efficiently than the remaining alternatives permitted under the Proposed Revisions.</p>

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1358	USCIS-2010-0008-1027	Rachel Odio, Public Counsel	<p>Comment part 2: The proposed changes reduce efficiency. Eliminating means-tested benefits from the eligibility criteria, limiting the documentary evidence that is accepted, and requiring each individual to submit their own fee waiver request form unnecessarily reduces the efficiency of the process. Proving receipt of means-tested benefits is currently the most common and straightforward method of establishing an applicant's inability to pay fees. Applicants normally prove receipt of such benefits by submission of a single document. Eliminating this eligibility option will make it more difficult and time-consuming for applicants and the community organizations who assist them to prepare the fee waiver applications. Instead, applicants most likely will need to provide multiple documents in order to attempt to verify their income or financial hardship, which will increase the time and resources required to prepare fee waiver requests. Removing the meanstested benefit eligibility criteria will also make adjudication more time- and resource-intensive for USCIS. The current criteria allows USCIS to accept the determination of a state or local agency that has already invested time in assessing an individual or family's means. By removing this criteria, USCIS will be forced to review a more voluminous record and assess applicants' income or financial hardship in each and every fee waiver request. This process will increase the time and resources required to adjudicate fee waiver requests and likely further increase adjudication costs and backlogs.</p> <p>Limiting the documentary evidence that can be accepted to establish eligibility for a fee waiver, such as requiring a tax transcript, will further increase the time and resources required to prepare fee waiver requests. Applicants who are eligible for fee waivers often lack access to resources such as computers and internet services that would facilitate requests for tax transcripts or Verification of Non-Filing letters. While many people keep copies of their tax returns, if applicable, requesting and waiting to receive the tax transcripts or Verification letters will cause additional delays, unnecessarily delaying individuals' ability to apply for immigration benefits, including employment authorization. This requirement will very likely also increase the numbof tax transcript and Verification of Non-Filing requests made to the Internal Revenue Service.</p>

ID	Comment.	Commentor	Comment
1359	USCIS-2010-0008-1027	Rachel Odio, Public Counsel	<p>Comment part 3: The proposed changes are unjustified. In the notice regarding the proposed changes, the agency indicates that it intends to eliminate the means-tested benefit eligibility criteria because income levels used for means-tested benefits eligibility vary across states. As noted above, however, 8 C.F.R. § 103.7(c) neither establishes, nor permits USCIS to establish, a uniform national income threshold for fee waiver eligibility. The only criteria is inability to pay. While income levels eligible for means-tested benefits may across states or between locales, this fluctuation is the natural consequence of the varying cost-of-living in different regions. Receipt of a means-tested benefit might not establish that an individual or family’s income meets unrelated federal poverty guidelines, but it does establish that the individual or family has a financial difficulty—and thus is unable to pay the fee. USCIS has not presented any evidence to the contrary, nor evidence that the agency granted fee waivers to individuals who are actually able to pay to fee, nor evidence of any other problems in adjudication under the current procedure.</p> <p>USCIS also indicates that the total value of fee waivers granted by the agency increased over the last eight years. USCIS fails to note, however, that application fees have also risen regularly—and substantially—over time. Between fiscal year 2016 and fiscal year 2017 alone, for example, the fee for a certificate of citizenship increased from \$600 to \$1,170. The increasing “total dollar value” of fee waivers granted by USCIS is the logical result of increasing fees. Moreover, USCIS does not use discretionary appropriations to process applications, because application fees cover USCIS operational costs. Consequently, fee waivers granted to qualifying applicants do not increase the burden on U.S. taxpayers.</p> <p>The proposed changes also restrict the type of documentary evidence that may be used to establish an individual’s eligibility for a fee waiver, such as a federal tax transcript or Verification of NonFiling letter. The agency provides no explanation why a tax transcript is superior to a copy of an individual’s tax return (which an applicant may already have on hand without need to request a transcript) or other evidence of income. This requirement must be justified before implementation because it imposes additional time and resource burdens on applicants, community organizations,</p>

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1382	USCIS-2010-0008-1066	Vichal Kumar, NDS Harlem	<p>Comment part 3: 3. The proposed rule duplicates agency efforts without a showing that a means-based test insufficiently demonstrates an applicant's eligibility for a fee waiver.</p> <p>The current means-based test sufficiently relies upon determinations previously made by other governmental agencies, including federal agencies, to demonstrate an applicant's eligibility for fee waivers. There has been no showing that the current fee waiver process is rife with fraud or applicants improperly taking advantage of the fee waiver process. Additionally, requiring supplemental documentation from the IRS will further burden that</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants. Sincerely yo s</p> <p>\\ Vichal Kumar Managing Attorney</p>

ID	Comment.	Commentor	Comment
1412	USCIS-2010-0008-1171	Laura Armstrong on behalf of La Casa Hogar	<p>Comment part 4: This proposal would adversely impact rural communities and populations. The proposed regulations state:</p> <p>“If you do not have any income, or cannot provide proof of your income, describe your particular situation in detail in Part 3., Item Number 9. [hardship section] and submit a Verification of Non-filing from the IRS. Also, submit affidavits from religious institutions, nonprofits, or community-based organizations verifying that the applicant is currently receiving some benefit or support from that entity and attesting to the applicant’s financial situation.”</p> <p>In rural areas such as the Yakima Valley, many individuals are not connected to a church or a nonprofit because there may not be one nearby. Individuals in rural regions are more isolated, especially in the winter, when roads become icy and snow-covered with few plows to clean them off. This proposed change would adversely impact rural individuals who may not be able to find a church or advocate attesting to their financial situation. Furthermore, the regulation proposes replacing a certified letter from a government agency with a nonprofit or church letter saying the person is lowincome. The extra work defeats the purpose of the regulation, because a state agency is a more reliable source of information.</p> <p>We strongly oppose this change and request you preserve existing methods of proving eligibility for the fee waiver. This proposed change in policy on fee waivers will further burden La Casa Hogar, our clients, our community, and lawful permanent residents and nonprofit legal services throughout the country.</p> <p>Best,</p> <p>Laura Armstrong Executive Director, La Casa Hogar laura@lacasahogar.org / 509-457-5058</p>

ID	Comment.	Commentor	Comment
1458	USCIS-2010-0008-1226	Michelle Seyler, Central American Resource Center - Los Angeles	<p>Comment part 4: D. Tax transcripts should not be required to establish eligibility for a fee waiver</p> <p>Finally, the proposed rule would require applicants to include their tax transcripts from the IRS to demonstrate that their household income is at or below 150 percent of the federal poverty guidelines. Currently, applicants can provide USCIS with a copy of their most recent tax return to show that they meet this requirement. It is unclear what the motivation behind this particular change is as the government has not provided an explanation as to why tax returns are insufficient. Obtaining a tax transcript is going to prove difficult and burdensome to applicants who likely do not have a copy of this document on hand. It will delay applicants from seeking relief for which they are eligible and greatly increase the burden of applying for immigration benefits.</p> <p>As a legal services provider, CARECEN has filed thousands of fee waivers for clients and it is unequivocally easier to do so if a client receives public benefits. USCIS states that the estimated time burden per response to a fee waiver is 1.17 hours and argues that these changes will decrease the time burden. However, even for our legal staff, it is sometimes difficult to determine if a client is eligible for a fee waiver based on taxes alone. For example, in the naturalization context, one of the first questions we ask a client is whether they receive public benefits and, if they do not, what their estimated income and household size is. We do this early in the consultation stage because we know that many of our clients will not be able to apply for naturalization if they are required to pay the fee. When reviewing a consultation, we are able to determine in a matter of seconds whether a person can apply for a fee waiver if they receive public benefits. If they do not, the analysis can drag on for days. This is because the client needs to obtain a copy of his or her taxes. We then need to discuss with the client what changes he or she has had in household income since last filing taxes. As some of our clients do not have full time jobs but rather work as contractors for different employers, this is often a difficult thing to discern. Because of all of these factors, we know that eliminating the means-tested benefits option will greatly increase, rather than decrease, the amount of time USCIS spends analyzing fee waiver eligibility.</p> <p>In addition, requiring tax transcripts will place a higher burden on clients who are either not Internet savvy or are seniors. For example, many of our naturalization clients are over the age of 65 and have never had a reason to learn how to navigate the Internet with efficiency. Some of them also do not have a child or family member who can help with this process. Additionally, many of these clients are retired and are therefore not required to file taxes. This will cause confusion as these naturalization applicants will be unsure which evidence is required for them to apply for a fee waiver.</p> <p>Finally, our clients who receive means-tested benefits live on very tight budgets. Each paycheck they receive goes to food, clothing, school supplies, rent, etc. Every dollar is accounted for. They do not have the ability to pay expensive immigration fees. The proposed changes to the fee waiver will make the immigration process even more arduous, confusing, and inaccessible for thousands of immigrants who would otherwise be eligible to apply for relief.</p>
792	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	Comment part

ID	Comment.	Commentor	Comment
1405	USCIS-2010-0008-1169	Adrienne Pon on behalf of the City and County of San Francisco and the San Francisco Immigrant Rights Commission	<p>Comment part 4: Reducing Efficiency</p> <p>USCIS states that the proposal will simplify the application process. In fact, it will make it more complex, on both sides. Instead of requiring less evidence from applicants, this proposal would force individuals to collect, and adjudicators to analyze, more lengthy records. While determining whether an applicant receives a means-tested benefit is a simple yes/no question, assessing an individual's income or degree of financial hardship is a more open-ended question that often cannot be answered by a single document. This proposal would therefore not reduce the evidence required for fee waiver adjudication. It would exponentially multiply it and increase cost and labor for the federal government as well as local cities and counties.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. USCIS will waste resources in duplicative efforts if it adopts the proposal.</p> <p>Receipt of a means-tested benefit is the only current method for establishing eligibility that involves a yes-or-no determination that administrators can reach by reviewing a single document. No one piece of evidence—not even a tax return or certification of non-liability for taxes—will always show how an individual's income compares to federal poverty guidelines, nor the extent to which an individual is experiencing current financial hardship.</p>

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1211	USCIS-2010-0008-0897	Grace Huang, Asian Pacific Institute on Gender- Based Violence	<p>Comment part 3: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. USCIS should provide that applicants continue to be permitted to submit applicant-generated fee waiver requests (i.e., comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial, for example, when survivors of domestic violence or sexual assault can apply for immigration benefits with minor children simultaneously. The proposed rule requests that each applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together. For a survivor who is regularly monitored by an abuser, numerous trips to gather documentation for each individual person may put a survivor at increased risk of harm</p> <p>Furthermore, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee.</p> <p>Receipt of a means-tested benefit should be more than ample sufficient evidence</p>

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1253	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 7: Internal Revenue Service’s Verification of Non-Filing: Instructions for Form I-912, Request for Fee Waiver; Specific Instructions, Part 3. Household Income; Your Annual Household Income Item Number 5 Documentation 5 [Page 6] & Item Number 6, Documentation 4 [Page7]</p> <p>Current Language: Your Annual Household Income ... Documentation. ...</p> <p>5. If you do not have any income, or cannot provide proof of your income, describe your particular situation in detail in Part 3, m Item Number 9, and submit a Verification of Non-Filing from the IRS. ... Item Number 6. Annual Income of All Family Members. ... Documentation. ...</p> <p>4. If any of the household members do not have any income, describe his or her particular situation in Part 2, Item Number 9, and submit a transcript of an IRS Verification of Non-filing. Recommended Language: Your Annual Household Income ... Documentation. ... 5. If you do not have any income, or cannot provide proof of your income, describe your particular situation in detail in Part 3, m Item Number 9, and submit a Verification of Non-Filing from the IRS. ... Item Number 6. Annual Income of All Family Members. ... Documentation.</p>

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1254	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 8: Additional Barriers for Survivors</p> <p>CAST has also identified additional barriers for survivors within the proposed revisions to the fee waiver guidelines, Form I-912, as well as Instructions to Form I-912. CAST provides the following suggestion to address these potential barriers:</p> <p>Removal of Part 7 Requestor’s Statement</p> <p>The proposed changes to the fee waiver guidance seems to have eliminated the ability for the principal applicant to apply for a single fee waiver form for all of their derivative applicants. As a result, it appears that each person in a family must request a fee waiver for their ancillary immigration form. Requiring each applicant to submit their own form will be inefficient, timeconsuming, and burdensome to the applicants that must fill out multiple forms with the same information as well as for the adjudicators that must process multiple fee waiver requests. Currently, family members can submit a single fee waiver application which simplifies the filing process because all relevant data is collected and submitted in one application. If each of the derivative family member must file their own individual fee waiver application, it will increase the burden on the applicants to gather information, especially the derivative applicants that are not located in the U.S. and reside abroad. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS although they may reside abroad and do not have access to these documentations. This proposed change will be duplicative and overly burdensome for not only the applicants, but USCIS adjudicators. CAST proposes that USCIS maintains the ability for the principal applicant to apply for the fee waiver for all relevant derivative applicants in a single fee waiver application.</p>

ID	Comment.	Commentor	Comment
369	USCIS-2010-0008-0486	Oksana Bilobran	<p>I oppose the proposed rule as it would create more complex, not uniformed, arbitrary, more costly and inefficient process for applying for fee waiver. Eliminating the use of public benefits to qualify for the fee waiver will create an undue burden on those who would benefit from the fee waiver the most. Currently in order to qualify for public benefits the applicants have to go through screening, interviews and document reviews. That process is the best available way to determine that someone is low income. Proposed rule would eliminate this well established process and would instead require the applicant for immigration benefits, immigration service providers and USCIS officer come up with a new way to assess if someone is low income. The fact is that people with very limited income or no income at all are not required to file a tax return. In the absence of a tax return or if life circumstances change after the filling of tax return, the applicants are left with very limited options to document their low income status. This change will create a backlog as many fee waiver requests will be potentially denied, resubmitted and re-evaluated.</p>

ID	Comment.	Commentor	Comment
1137	USCIS-2010-0008-0608	Sonya Chung, Minkwon Center for Community Action	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

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1170	USCIS-2010-0008-0968	Tana Liu- Beers, Disciples Immigration Legal Counsel	<p>Comment part 3: The proposed changes would increase inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes would streamline and expedite the process of requesting a fee waiver. Instead, these proposed changes would clog an already overburdened system with additional paperwork. With nearly 6 million pending cases as of March 31, 2018, USCIS has conceded that it lacks the resources to timely process its existing workload. These additional operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal would also place a burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on income must also request the required documentation from the IRS. Moreover, any changes in employment or tax filing requirements would require IRS verification. An unclear number of applicants would have to reapply to the IRS for certified copies of their transcripts. In order to ensure the fair and efficient adjudication of fee waiver applications, USCIS should be expanding the types of acceptable documentary evidence rather than further restricting it.</p>

ID	Comment.	Commentor	Comment
1230	USCIS-2010-0008-0779	Melissa Mora, Neighborhood Defender Service of Harlem	<p>Comment part 4: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies. USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form 1-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls. This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit). In the past, I've had to request tax transcripts for clients in-person, by phone, by mail, and online. I've experienced delays and setbacks in obtaining transcripts many times in the past. These issues will only further delay immigrant's ability to easily submit application for expeditious adjudication.</p>

ID	Comment.	Commentor	Comment
1232	USCIS-2010-0008-0779	Melissa Mora, Neighborhood Defender Service of Harlem	<p>Comment part 4: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies. USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form 1-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls. This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit). In the past, I've had to request tax transcripts for clients in-person, by phone, by mail, and online. I've experienced delays and setbacks in obtaining transcripts many times in the past. These issues will only further delay immigrant's ability to easily submit application for expeditious adjudication.</p>

ID	Comment.	Commentor	Comment
1235	USCIS-2010-0008-1003	Margaret Russell on behalf of Mid Minnesota Legal Aid (Legal Aid)	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies. USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>Delays in waiting for IRS transcripts or verification would impact an immigrant applicant's ability to timely file an immigration application. Many clients who are applying to renew their employment authorization document (EAD) have been filing six months in advance of the expiration of their EAD's. Even in those cases, there have been cases where a client's EAD has expired before the new work permit has arrived. Those clients are left unable to work and this destabilizes their families. If my clients had to wait for IRS tax transcripts before they could file a fee waiver, I can foresee many more clients put into the situation of their EAD expiring before they receive their new one and suffering job loss. The IRS has been cutting positions and in fact, closed its office in Minneapolis, MN, the largest city in the State. Access to information from the IRS is not readily available to many immigrants.</p> <p>The 2017 Taxpayer Advocate's Report to Congress emphasized how cuts to the IRS budget have resulted in the closure of IRS offices and concerns about "how the IRS has been beaten down by continuing funding cuts and about concerns the agency is stretched so thin it will not be able to properly implement tax reform". The same report cites to a Research Study: A Further Exploration of Taxpayers' Varying Abilities and Attitudes Toward IRS Options for Fulfilling Common Taxpayer Service Needs, in which it was found that "41 million taxpayers had no broadband access in their homes, and 14 million have no internet access at home. Yet the IRS continues to direct taxpayers to create online accounts, even though taxpayers seeking to do so have a "pass rate" of only about 30 percent — meaning that only about 3 out of 10 taxpayers attempting to create an online account are able to do so." Requiring immigrants to gather information from the IRS, which is currently cutting positions and offices, will only exacerbate the problems at the IRS and cause serious barriers for immigrants needing to submit immigration applications.</p>

ID	Comment.	Commentor	Comment
1240	USCIS-2010-0008-1013	Yadira Chavez, On The Move/Citizenship Legal Services	<p>Comment part 5: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018. DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has, in a different manner, or through a different agency (verification of receipt of a means-tested benefit).</p> <p>At CLS we assist our clients in obtaining all the documentation needed for Form I-912. In our experience when requesting documentation from the IRS or other non-immigration agencies we have found that it could take up many weeks or months for the documents to come in, thus delaying the ability to timely file applications.</p>

ID	Comment.	Commentor	Comment
1262	USCIS-2010-0008-1073	Miko Tokuhama- Olsen on behalf of Legal Aid Society of San Diego, Inc.	<p>Comment part 4: Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals keep copies on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail. This will also create an undue burden on the IRS when requests for the federal tax transcript begin flooding in.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. Some applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1267	USCIS-2010-0008-1020	John Keller on behalf of the Immigrant Law Center of Minnesota	<p>Comment part 4: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1276	USCIS-2010-0008-1107	Omar Carrera on behalf of Canal Alliance	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>The expected delays in adjudicating Form I-912 would negatively impact our clients. The uncertainty of whether they have submitted sufficient evidence or not will be devastating to our client's emotional health. We work with very sensitive groups that have been victims of domestic violence or have endured other mental or physical trauma. We cannot put our clients through more than they can handle.</p> <p>Moreover, obtaining documents from the IRS can sometimes be time-consuming. IRS.gov only provides tax transcripts of the last three years. If our clients need to submit more of other years they will have to wait weeks until they receive those transcripts in the mail. This means that it will delay their ability to timely file their immigration applications.</p>

ID	Comment.	Commentor	Comment
1305	USCIS-2010-0008-0768	Koula Glaros- King, Community Legal Aid	<p>Comment part 3: 11. The proposed changes will increase inefficiencies in processing fee vvaiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 rnillion pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls. The proposed format encourages improper requests for any USCIS benefit and substantially increases the volume of fee waiver rejection correspondence. The increased paperwork the new form would generate diverts valuable USCIS resources from adjudication to intake processing and adds to the ballooning backlog of delays in consideration of immigration benefits.</p> <p>This proposal fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on his or her annual incorne must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1316	USCIS-2010-0008-1002	Peggy Russell, on behalf of Mid Minnesota Legal Aid (Legal Aid)	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all</p> <p>changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>Delays in waiting for IRS transcripts or verification would impact an immigrant applicant's ability to timely file an immigration application. Many clients who are applying to renew their employment authorization document (EAD) have been filing six months in advance of the expiration of their EAD's. Even in those cases, there have been cases where a client's EAD has expired before the new work permit has arrived. These clients are left unable to work and this</p>

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1328	USCIS-2010-0008-0928	Joomi Kim, Korean Community Service Center	<p>Comment part 3: C.The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification</p>

ID	Comment.	Commentor	Comment
1336	USCIS-2010-0008-1007	Salvador Sanabria, Salvadoran American Leadership and Educational Fund	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1341	USCIS-2010-0008-1012	Julia Brown, Immigrant Legal Advocacy Project	<p>Comment part 4: II. The proposed rule will make fee waiver processing even more inefficient and burdensome on government agencies.</p> <p>USCIS states that the proposed changes will standardize, modernize, and accelerate the process of requesting a fee waiver by clearly laying out the most relevant data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1348	USCIS-2010-0008-1017	Salvador Sanabria	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1352	USCIS-2010-0008-1021	Christine Chen, Asian Americans Advancing Justice - Los Angeles	<p>Comment part 4: III. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>Already, Advancing Justice – LA has experienced the long process of requiring documentation from the Internal Revenue Service (IRS) in the context of Requests for Evidence (RFE) for naturalization cases. An RFE may request an applicant to demonstrate “tax compliance” by asking the applicant to submit proof tax filing for years within the statutory period. Because</p>

ID	Comment.	Commentor	Comment
1356	USCIS-2010-0008-1022	Laura Flores- Dixit, California Rural Legal Assistance Foundation	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes would slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form 1-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1362	USCIS-2010-0008-1033	Monica Glicken, Public Law Center	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver. However, based on our experience assisting low-income immigrants, PLC believes these these proposed changes will actually slow down an already overburdened system, delaying and ultimately denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1379	USCIS-2010-0008-1056	Leah Engle, Kentucky Equal Justice Center	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1385	USCIS-2010-0008-1067	Tamara Shehadeh- Cope, Community Justice Project	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1391	USCIS-2010-0008-1074	Emily Leung, Justice Center of Southeast Massachusetts LLC	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. The claim that the proposed changes will simplify or expedite the process is unfounded as USCIS is proposing to eliminate the most straightforward manner of assessing fee waiver eligibility and replacing it with a significantly more complex and lengthy adjudication. The current practice of using other means-tested benefit eligibility to assess fee waiver eligibility is logical and simple. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>Each proposed changed will result in a more complex adjudication for USCIS, adding a cost and time burden to each case. The proposal to require the use of the I-912 form in all cases will increase the processing times for USCIS as a self-generated form typically is much shorter and direct in providing the required information. The proposal that each individual in a household is required to submit a separate I-912 form will add to the cost and time burden for each case. Individuals in the same household will likely submit the same financial documentation, but each form and the accompanying documentation will be reviewed and adjudicated separately, resulting in duplication and increase workload. Finally, the elimination of the means-tested benefit category of proof will require USCIS to review financial documentation more numerous and complex than the benefit eligibility verifications that they currently accept. In addition to eliminating means-tested benefits from the eligibility determination, USCIS has also increased</p>

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1401	USCIS-2010-0008-1163	Kristin Brown, Empire Justice Center	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

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1416	USCIS-2010-0008-1176	Adoubou Traore, African Advocacy Network	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

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1421	USCIS-2010-0008-1180	Marita Etcubanez, Asian Americans Advancing Justice AAJC	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

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1431	USCIS-2010-0008-1191	Koriel Jock	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

ID	Comment.	Commentor	Comment
1448	USCIS-2010-0008-1208	Leena Khandwala, The Legal Aid Society	<p>Comment part 4: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>Allowing for the means tested benefits criteria when assessing an applicant's fee waiver request is the most efficient manner for the requests to be evaluated. If an applicant has already been proven eligible for a benefit that is income dependent (Medicaid, SNAP, etc.) by another government agency there is no need for USCIS to spend time looking through, often lengthy and complicated, income records to make a finding regarding the applicant's income eligibility. By taking away the means tested benefits criteria USCIS is duplicating work that has already been completed and verified by another agency. It is a wasteful use of time and resources that USCIS could otherwise devote toward lessening adjudication times, which have only increased in recent years.</p>

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1451	USCIS-2010-0008-1221	Deana Gullo on behalf of Catholic Charities of Orange County	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>Further review of additional documents will make processing times of applications take longer for USCIS officers and impose extra wait time on applicants who already wait long periods of time for decisions on applications that often costs them a job or to lose other needed services in their lives.</p>

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1454	USCIS-2010-0008-1225	Jennifer Ocon, UpValley Family Centers of Napa County	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit). In our experience, procuring documents from the IRS and other government agencies can cause significant delays in our ability to timely file applications. We do not believe this proposal is beneficial.</p>

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1459	USCIS-2010-0008-1226	Michelle Seyler, Central American Resource Center - Los Angeles	<p>Comment part 5: II. The proposed changes will increase inefficiencies in processing fee waiver requests and further burden government agencies</p> <p>USCIS contends that the proposed changes will streamline and expedite the fee waiver process because they will only receive evidence that is necessary to make an eligibility determination. On the contrary, these proposed changes will slow down an already overburdened system. As of March 31, 2018, there were nearly 6 million pending cases in front of DHS. Indeed, the government itself has admitted that USCIS does not have sufficient resources to process the influx of applications it has received. Given this backlog, USCIS should be seeking to ease the burden of applying for a fee waiver rather than raising the evidentiary standards and making it increasingly difficult for people to apply for naturalization and other immigration benefits.</p> <p>The proposed changes will also place an undue burden on the IRS and USCIS does not address whether the agency is prepared to respond to the increase in document requests it will receive if this proposal is finalized. Applicants who are applying for a fee waiver based on income will be required to request documents from the IRS to establish their eligibility. This will include verification from the IRS of changes in employment, non-employment, or inability to work. Applicants will likely need to return multiple times to the IRS to obtain copies of all necessary documents. This will not only delay applicants from filing for relief and benefits, but will also increase the IRS' production of documents and evidence it will need to provide. This seems arbitrary and duplicative as much of this evidence can be provided through other means, such as a verification of public benefits letter from the awarding government agency, or an affidavit from the applicant documenting his or her income. These delays will have negative impacts on our clients. For example, a U Visa recipient who is applying to adjust status on the basis of four years of continuous, U-visa status, is eligible for a fee waiver. This is particularly important in the U Visa context because many of our clients are survivors of domestic violence and are among some of the most vulnerable members of the immigrant community. Adjusting their status is an imperative, life-changing step for them. However, if an application is returned for an insufficient fee waiver, it is possible that we will miss the deadline to timely file their adjustment. This, coupled with the other changes implemented by USCIS over the last year, could have dire consequences for these applicants.</p>

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1462	USCIS-2010-0008-1228	Iris Bercovitz, SEAMAAC	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

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1469	USCIS-2010-0008-1232	Sanaa Abrar, United We Dream	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

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1476	USCIS-2010-0008-1235	Katharyn Christian McGee, Duane Morris LLP	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

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1480	USCIS-2010-0008-1236	Maricela Gutierrez on behalf of Services, Immigrant Rights, and Education Network (SIREN)	<p>Comment part 4: III. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our country's commitment to welcoming immigrants.</p> <p>If you need any further information, please do not hesitate to contact me at maricela@siren-bayarea.org.</p>

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1482	USCIS-2010-0008-1237	Jorge Baron on behalf of Northwest Immigrant Rights Project (NWIRP)	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit). Based on our experience serving immigrant community members and having to request tax transcripts from the IRS in other contexts, we are confident that the proposed changes will result in a substantial burden being imposed on the IRS that has not been taken into account by the proposal.</p> <p>In addition, as noted earlier, the proposed changes will result in delays for people in immigration detention as they will now have to wait for IRS responses to their request for the documentary evidence envisioned by the proposed changes. This will mean that these applicants will have to ask the immigration court to continue their case while they remain detained and will lead to substantial</p>

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1490	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>Comment part 7: IV. The proposed changes would increase burdens on adjudicators and relevant federal and state government agencies to address proposed changes to the fee waiver rule.</p> <p>By proposing to eliminate a simple bright-line test, USCIS will impose a heavier burden on its own adjudicators and other government agencies that assist immigrants and their families.</p> <p>A. The proposed rule change removes a bright-line test that is efficient, cost-saving, and clear to understand and administer – thereby increasing burdens on USCIS adjudicators who are already backlogged in adjudicating agency applications.</p> <p>Just as compiling documentation and completing the application will burden applicants, processing more pages of evidence would slow adjudicators. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls. USCIS can ill afford to further delay its operations, where backlogs of pending applications and wait times for adjudication have increased between FY2016 and FY2019 for the agency. These changes will slow down an already overburdened system.</p> <p>USCIS will waste resources in duplicative efforts if it adopts the proposal. Receipt of a means-tested benefit is the only current method for establishing eligibility that involves a yes-or-no determination that administrators can reach by reviewing a single document. No one piece of evidence—not even a tax return or certification of non-liability for taxes—will always show how an individual’s income compares to federal poverty guidelines, nor the extent to which an individual is experiencing current financial hardship. For example, filings with the IRS omit income not subject to taxation but relevant to fee waiver adjudication, such as Supplemental Security Income or personal gifts or inheritance. USCIS would further squander resources by prohibiting its employees from relying upon their state and local counterparts’ competent work, lengthening and complicating its adjudicators’ task. The purpose of using means-tested benefit for assessment of ability to pay also saves administrative expense. Receipt of</p> <p>means-tested benefit is straightforward economic threshold because it takes advantage of the work</p>

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1491	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>Comment part 8: A. The proposed changes would impose administrative and cost burdens on federal and state government agencies who assist immigrants with these applications.</p> <p>The proposed change would burden government agencies other than USCIS. Many applicants who receive means-tested public benefits are not required to file tax returns. These people would now have to file needless returns or request certification of non-liability for taxes from the IRS, as the most likely first step toward demonstrating income below the poverty guidelines and/or financial hardship. This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request IRS documentation proving their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>Furthermore, the federal government has long entrusted its state and local counterparts with adjudicating eligibility for federally-funded benefits programs. States have made no alterations in their procedures for awarding means-tested benefits that would justify ending USCIS reliance on this factor. Therefore, there is no reason for the agency to depart from our well-functioning system of local, state, and federal cooperation in assessing need and qualification for assistance.</p> <p>Under the proposal, more applicants would also have to request certifications from courts overseeing alimony and child support agreements, the Social Security Administration, the Veteran's Administration, municipal assessors and clerks, and child welfare agencies, as well as banks, social service organizations, and employers.</p>

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1212	USCIS-2010-0008-0897	Grace Huang, Asian Pacific Institute on Gender- Based Violence	<p>Comment part 4: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will streamline and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. With nearly 6 million pending immigration matters as of March 31, 2018, DHS acknowledges that USCIS lacks the resources to timely process its existing workload. These increased operational demands would be imposed upon an already overburdened agency.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or nonemployment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>The increased delay in obtaining the documentation supporting fee waiver requests will, in turn, delay the ability of survivors of domestic violence and sexual assault to apply for their immigration benefits in a timely way, likely causing them to lose</p>

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622	USCIS-2010-0008-0764	Michelle Siri on behalf of the Women's Law Center of Maryland	<p>On behalf of the Women's Law Center of Maryland, Inc., a non-profit legal services provider dedicated to ensuring the physical safety, economic security, and autonomy of women in Maryland, I hereby submit this comment in opposition to the Revision of Request for Fee Waivers and Exemptions. Please see attached. November 26, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Service Department of Homeland Security 20 Massachusetts Ave., NW Washington, DC 20529-2140</p> <p>RE: USCIS-2010-0008, OMB Control Number 1516-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions Submitted via [www.regulations.gov]</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of The Women’s Law Center of Maryland, a statewide non-profit legal services provider, I am submitting this response to “U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions” published in the Federal Register on September 28, 2018 (hereinafter “proposed revisions”). These proposed revisions relate to Form I-912; Request for Fee Waiver and accompanying memoranda.</p> <p>Founded over forty-years ago, our mission is to ensure the physical safety, economic security, and autonomy of women in Maryland. We work towards achieving our goal by providing direct legal representation, information and referrals, and legislative advocacy. One of our primary programs works directly with immigrant survivors of domestic and sexual violence and those affected by human trafficking to provide them legal status in this country through U-Visas, T-Visas and Self-Petitions. Our clients come to us in moments of crisis without means to provide for themselves or their families and leave us strong, independent and on the path to</p>

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865	USCIS-2010-0008-0733	Suzanne McCormick on behalf of Immigration Center for Women and Children (ICWC)	<p>Comment Part 1: Dear Ms. Deshommes:</p> <p>On behalf of Immigration Center for Women and Children (ICWC), I am submitting this response to "U.S. Citizenship and Immigration Service Agency information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions" published in the Federal Register on September 28, 2018 (hereinafter "proposed revisions").¹ These proposed revisions relate to Form 1-912; Request for Fee Waiver and accompanying memoranda.²</p> <p>Our organization works directly with immigrant survivors of domestic and sexual violence and children who have suffered abuse, abandonment or neglect. ICWC was founded in 2004 and has three offices in Los Angeles, San Francisco and San Diego. ICWC has filed thousands of U Visa, VAWA and SIJS cases for immigrant survivors of trauma.</p> <p>Given our mission and our work, we stridently oppose these proposed revisions to the 1-912 fee waiver application and instructions as well any corresponding changes to the USCIS Policy Memorandum, PM-602-0011.^{1.3} We call on USCIS to withdraw the proposed revisions to the fee waiver form and USCIS memoranda and instead, to develop policies and procedures that ensure that immigrant survivors of violence have equal access to critical, life-saving protections.</p> <p>The proposed revisions directly conflict with the clear will of Congress that survivors not be precluded from seeking status due to inability to pay fees.¹ Moreover, the abrupt change in fee waiver policy violates the special "any credible evidence" standard Congress mandated, in express recognition that survivors of domestic and sexual violence, in particular, often do not control "primary" forms of evidence.⁵ Furthermore, the proposed revisions will cause significant additional burdens for immigrant survivors of domestic violence, sexual assault and human trafficking, as well as for the service providers that assist them.</p> <p>A. USCIS Proposed Revisions Undermine the Violence Against Women Act and the Trafficking Victims Protection Act.</p> <p>The survivors we help need fee waivers to access the vital immigration protections Congress created in the Violence Against Women Act (VAWA) and Trafficking Victims Protection Act.</p>

ID	Comment.	Commentor	Comment
1000	USCIS-2010-0008-1095	Anonymous	<p>November 26, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Service Department of Homeland Security 20 Massachusetts Ave., NW Washington, DC 20529-2140</p> <p>RE: USCIS-2010-0008, OMB Control Number 1516-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions Submitted via [www.regulations.gov]</p> <p>Dear Ms. Deshommes:</p> <p>I am submitting this response to “U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions” published in the Federal Register on September 28, 2018 (hereinafter “proposed revisions”). These proposed revisions relate to Form I-912; Request for Fee Waiver and accompanying memoranda.</p> <p>I am an attorney at a non-profit organization, working directly with immigrant survivors of domestic and sexual violence. I have worked in this capacity for seven years. Every day, I meet domestic and sexual violence survivors as they are trying to flee from their abusive situations. Many have children. Many have no family to help them. Many don’t speak English. All of them have faced abuse at the hands of their partners or other family members and are seeking to find a way out of their abusive situations. Despite their seemingly impossible situations and the risks to their safety that they face, every single one of them comes to my office looking for</p>

ID	Comment.	Commentor	Comment
1159	USCIS-2010-0008-1096	Christina Gill on behalf of Greater Hartford Legal Aid, Inc.	<p>Comment part 2: A. USCIS Proposed Revisions Undermine the Violence Against Women Act and the Trafficking Victims Protection Act.</p> <p>The survivors we assist need fee waivers to access the vital immigration protections Congress created in the Violence Against Women Act (VAWA) and Trafficking Victims Protection Act (TVPA). They often are fleeing abusive situations in which they have experienced both physical and economic abuse. For many of our clients, the abuser controls the finances and access to any financial documentation, and often prevents the client from working. Thus, survivors often do not have resources to pay for fee-based ancillary forms nor have "primary documentation" (tax transcripts, Verification of Non-Filing) to demonstrate their economic need.</p> <p>This is why we are thankful that Congress recognized this barrier when it created the special "any credible evidence" standard for these forms of relief.⁶ USCIS has acknowledged and explained how and when they must apply this standard for survivor-based protections like VAWA self-petitions and U and T visa applications.⁷ This standard is in line with Congress's intent to ease the evidentiary challenges that immigrant survivors often face. In VAWA self-petitions, for example, the former Immigration and Nationality Service advised that "adjudicators should give due consideration to the difficulties some self-petitioners may experience in acquiring documentation, particularly documentation that cannot be obtained without the abuser's knowledge or consent."⁸</p> <p>USCIS must not impose a higher evidentiary standard on fee waivers than it would on the merits underlying petitions. To do so would will create unnecessary barriers for many of the domestic and sexual assault survivors we serve.</p> <p>The proposed revisions regarding additional documentation like tax transcripts or a verification of non-filing from the IRS to demonstrate an applicant's income is under 150% of the poverty guidelines is overly burdensome for survivors. Many survivors do not have a stable living address or may be living in a domestic violence shelter as a result of the abuse they have experienced. For example, our office represents a client who had to move three times in only four months in order to escape her abuser. Clients often stay a week or two at motels, or with friends or family while they try to find stable housing. Others may be living in a domestic violence shelter where the address is confidential or they are moved from location to location; and therefore, they cannot provide a stable living address to request or receive documentation.</p> <p>Without a stable living address, a survivor will likely experience significant difficulties in obtaining the required documentation from the IRS. In our experience, the IRS will only send a transcript to the address at which the individual last filed. For many survivors, this means the transcript would be sent to their abuser's address, making it impossible for them to obtain, and may even expose these vulnerable clients to additional harm by their abusers. For example, another client who filed an I-751 based on battery and extreme cruelty attempted to obtain an IRS tax transcript; however, the IRS would only send it to the address used to file the taxes, which was where her abuser lived. When the abuser discovered the tax transcript, it sparked inquiries by the abuser, exposing our client to increased feelings of insecurity and vulnerability.</p> <p>Instead of requiring evidence that may increase burdens for survivors, USCIS should maintain flexible standards that recognize the dynamics of intimate partner violence and economic hardship and conform to existing authority.</p>

ID	Comment.	Commentor	Comment
1195	USCIS-2010-0008-0789	Jean Bruggeman, Freedom Network. USA	<p>Comment part 2: 1. USCIS’ Proposed Revisions Violate the Spirit and Letter of the Violence Against Women Act (VAWA) and the Trafficking Victims Protection Act (TVPA)</p> <p>In the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008, Congress specifically created a waiver of all fees related to humanitarian visas through adjustment of status.⁴ Human trafficking survivors, almost without exception, have been denied regular paychecks. Few survivors have any documentation of their labor, and the documentation that they have is often fraudulent. This fraud is, in fact, a key element of the trafficking crime. Therefore, trafficking survivors are unlikely to have accurate documentation of their recent income.</p> <p>Additionally, the humanitarian visas are subject to the “any credible evidence” standard.⁵ Survivors of human trafficking and other forms of exploitation and abuse are unlikely to have consistent evidence and documentation. They have had limited contact with friends, family, and community members. The perpetrators have threatened and assaulted survivors. The perpetrators almost uniformly take all documentation, including identity documents and documentation of their employment. Trafficking survivors often have no financial resources, and are reliant on nonprofit organizations for their daily needs, including housing and food. Therefore, survivors must be allowed to provide whatever documentation they can. USCIS must not impose a higher evidentiary burden for the fee waiver than applies to the underlying application. USCIS, instead, proposes that applicants should be required to provide standard documentation such as tax transcripts to demonstrate their financial need. Human trafficking survivors are unlikely to have tax transcripts, to have filed tax returns, or to even understand what USCIS is requesting them to provide. Currently, trafficking survivors often rely on statements from nonprofits, or documentation of public benefits that are being provided from state or local programs. These sources are able to interview survivors, review any documentation that they have, and make an assessment of the survivor’s credibility. These alternatives are more realistically available to trafficking survivors than a tax transcript.</p>

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1440	USCIS-2010-0008-1199	Cecelia Levin, ASISTA	<p>***Comment did not paste well*** Comment part 6: D. Requiring Documentation of Income Will Create Delay and Burdens for Survivors</p> <p>Instead of requiring evidence for fee waivers that imposes barriers to status for survivors, USCIS should maintain the flexible standards required by Congress that recognize the dynamics of intimate partner violence and economic hardship. The new IRS documentation requirement proposed by USCIS seems designed to discourage survivor access to status. The proposed revisions indicate that applicants who apply for a fee waiver based on having income level at or below 150% of the federal poverty guidelines must also request the required documentation from the IRS in order to prove their eligibility. In addition, all changes in employment, or nonemployment, inability to work, or need to file will require an IRS verification.</p> <p>Many survivors may not, for a myriad of reasons, have access to the documents the proposed revisions indicated. Survivors may not have access to their tax documentation because they may be still living with their abusers, or recently fled an abusive situation and not know how to obtain the requested documentations. Survivors with low English proficiency or in remote locations may also have difficulty obtaining the required documentation under this criteria. The information contained in the IRS documents may instead be shown with 1) evidence survivors may already have safely available like federal tax returns or pay stubs; 2) credible documentation submitted by other agencies, such as affidavits from shelters or community based organizations; or 3) verification of receipt of a means-tested benefit.</p> <p>The proposed revisions will cause additional hardship for service providers, especially those who serve survivors of domestic violence, sexual assault and human trafficking who are applying for humanitarian protections. The limitations on documents to show eligibility for a fee waiver will cause unnecessary delay and burden for survivors and further drain limited time, capacity and resources of service providers who assist them.</p> <p>Making the documentation requirements for fee waivers more stringent will exacerbate already existing barriers that survivors face accessing fee waivers on humanitarian protections. Prior to the proposed fee waiver revisions, USCIS has been having difficulty verifying the information</p>

ID	Comment.	Commentor	Comment
23	USCIS-2010-0008-0167	Julia Morgan	<p>I do not see the point of this change. The verification of non-filing must be obtained from the IRS, but tells USCIS nothing about the income level of a non-filer. The SNAP and MFIP benefits letter on the other hand in our state lists the number of the eligible members in the household, the income of the beneficiary, what 130% of the poverty level is for the size household and when the next review for the benefit is. How is that less useful than a letter from the IRS which will be another number of steps for people to go through to prove NOTHING? Nor does the poverty level varying from place to place make this sensible. It varies because the federal poverty level does not reflect the differences in cost of living in states. This is just one more way of making it hard for people of limited means to integrate into US civil society. This is shameful bureaucratic nonsense.</p>
591	USCIS-2010-0008-0855	Christopher Schettini	<p>I oppose the proposed rule change. The requirement of submitting verification of non-filing unnecessarily adds to the work of preparers and adjudicators without any benefits in efficiency or accuracy for adjudicators. For applicants who have received a means-tested benefit, such evidence is generally much more readily available than verification of non-filing. Evidence of receipt of means-tested benefits should be sufficient proof of inability to pay. Even if it were not, eligibility letter should be considered sufficient proof of income. These proposed changes will add to the burden of preparing the I-912, discourage applicants from filing for fee waivers, and discourage them from filing for immigration benefits and naturalization.</p> <p>I therefore strongly urge that the proposed rule change be rejected.</p>
971	USCIS-2010-0008-1053	Michael Santomauro DePaul University Asylum & Immigration Law Clinic	Comment part

ID	Comment.	Commentor	Comment
7	USCIS-2010-0008-0146	Samuel Smith	I believe that this regulation would cause an increase in an ability to receive immigration benefits, without an increase in security or any other meaningful factor. Tax returns used to prove income are a snapshot into a financial life, especially several months after taxes have been submitted, and they do not reflect the current income of clients. Additionally, this will create more work for practitioners--again, for no measurable benefit. Many people in my office have attempted to prove current income with pay stubs and it was not accepted by USCIS. This change is unnecessary and should not be followed through with.
16	USCIS-2010-0008-0161	Wendy Tejeda	I BELIEVED IT WILL AFFECT FAMILIES THAT HAVE LOST A JOB AND WHILE FIND A PERMANENT JOB, THEY BECOME "SELF EMPLOYEES" AND WILL NOT HAVE HOW TO SEND EVIDENCE OF THEIR INCOME OR THE PERSON WITH DISABILITIES OR RETIRED PEOPLE THAT THEY HAVE SSI AND THEY DO NOT MAKE TAXES TO EVIDENCE THAT THEY ARE THE ONLY ONES SUPPORTING THEM SELVES.

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36	USCIS-2010-0008-0189	Louie Vital	<p>I object to the proposed revision to the fee waiver process. Many elderly people are not required to file taxes due to their low income, so they use the means tested benefits option in order to apply for the fee waiver. Due to their age and lack of employment and the fact that they dont file an income tax return, it would be impossible for them to prove they are eligible for the fee waiver.</p> <p>The proposed changes will place an undue burden on future citizens to prove their income status. If we rely on tax returns alone, a significant portion of people will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver.</p> <p>I oppose the proposed revision because many immigrants rely on the means tested benefits requirement to be able to apply for the fee waiver. It is unconscionable that USCIS is using this tactic to punish poor families. I hope this proposal does not pass.</p>
42	USCIS-2010-0008-0192	M Thach	<p>The proposed changes will place an undue burden on future citizens to prove their income status. If we rely on tax returns alone, a significant portion of people will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver.</p>

ID	Comment.	Commentor	Comment
43	USCIS-2010-0008-0183	Rebecca Liu	I object to the proposed revision to the fee waiver process. Many elderly people are not required to file taxes due to their low income, so they use the means tested benefits option in order to apply for the fee waiver. Due to their age and lack of employment and the fact that they dont file an income tax return, it would be impossible for them to prove they are eligible for the fee waiver.
65	USCIS-2010-0008-0212	Henry Milander	I object to the proposed revision to the fee waiver process. Many elderly people are not required to file taxes due to their low income, so they use the means tested benefits option in order to apply for the fee waiver. Due to their age and lack of employment and the fact that they dont file an income tax return, it would be impossible for them to prove they are eligible for the fee waiver.
87	USCIS-2010-0008-0238	Fidelie Nawej	I work with a resettlement agency and i think that It disadvantage low income people who are not required to file for taxe return.
93	USCIS-2010-0008-0235	Jacob Carter	This policy disadvantages low income immigrants who have not been able to file a tax return. These groups are not required to file tax returns and will have the extra burden of proving they didn't need to file a tax return.
117	USCIS-2010-0008-0268	Lynne Kuemmel	Most people who need a fee waiver for citizenship applications don't have a tax return! They make so little money they don't even file. Making this a requirement is willful obstruction for poor people to be a part of the American dream! Keep the option of allowing benefits letters. These are waivers for people who truly need financial assistance.

ID	Comment.	Commentor	Comment
120	USCIS-2010-0008-0256	Nikki Hurley	I am a resident of Seattle, WA and I am opposed to the proposed changes to the fee waiver rules. Putting more restrictions on low income people is always harmful to our society. The costs associate with gaining citizenship are monumental and not accessible to many people, especially new immigrants. Many people, especially elders, with the lowest incomes do not have to file taxes. Because of this,they use other currently accepted methods to verify their incomes in order to apply for the fee waiver that they clearly need. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver. I want to live in a country that actually abides by it's stated beliefs- that immigrants and the diversity that they bring are a benefit to all society and that we take care of the most vulnerable among us. Please do not make the proposed rule change. Please care about people, especially low income people and immigrants, because they are people.
123	USCIS-2010-0008-0263	Kevin Duncan	I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. This change impacts the ability of low income individuals to prove they are eligible for the fee waiver, and as a result pay for necessary procedures to become US citizens without clearly identifying the need for this policy change.
127	USCIS-2010-0008-0273	Julie Wilchins	I object to this proposal to make it impossible for the most vulnerable citizenship applicants to apply for a fee waiver. People with the lowest income are not required to file federal tax returns, and thus will not be able to provide the sole income verification that would be accepted pursuant to this proposed rule change.
130	USCIS-2010-0008-0255	Theresa Redfern	Low income earners will be unable to prove their income status because they are not required to file federal income taxes. For this reason, I am completely against the proposed changes.

ID	Comment.	Commentor	Comment
136	USCIS-2010-0008-0282	CJ Kennedy	<p>I strongly opposed this new policy. Many elderly people with the lowest incomes are not required to file taxes, hence they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. This change will make it impossible for the low income individuals to prove they are eligible for the fee waiver, thus prohibiting them from US citizenship application as they cannot afford the hundreds of dollars of application fee.</p>
138	USCIS-2010-0008-0290	Cameron Levin	<p>Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I am a volunteer for OneAmerica, a 501(c)(3) organization that helps people apply for U.S. citizenship with free assistance from volunteer attorneys. Over the years, many of the clients we serve have been eligible for fee waivers based on receipt of public benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people. I oppose the rule for these reasons:</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>Many elderly and disabled people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p>

ID	Comment.	Commentor	Comment
171	USCIS-2010-0008-0318	melendy lori	<p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p>
183	USCIS-2010-0008-0327	Marnina Cherkin	<p>I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p>

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185	USCIS-2010-0008-0330	Alice Becker	<p>I am writing to object to eh proposed fee waiver eligibility rule change. The proposed change will make it difficult if not impossible to apply for a fee waiver. This would be a substantial barrier to the fundamental right of any person in the U.S. to apply for citizenship. I urge the federal government to maintain the current rule which permits other options including evidence of a benefit letter. Currently, the vast majority of low-income applicants use a benefit letter to prove their eligibility. The benefit letter is easy to obtain and is proof of their low-income status. The proposed revision would mean that the benefit letter will no longer be accepted by U.S. Citizenship and Immigration Services (USCIS) as proof of eligibility for the fee waiver. If the revision goes into effect, the only way a person could prove their eligibility would be via their income tax return. This is problematic because many low-income individuals are not required to file federal income taxes even if they are employed. Therefore, they would not have an income tax return to submit as proof of eligibility.</p> <p>Advising all low-income community members to file income taxes is not feasible because there are cultural and financial barriers to doing so. The revision contains no remedy for how those people who are not required to file income taxes (such as retirees, students, people on SSI) could prove their low-income status to USCIS. This places an undue burden on the individual with no recourse.</p> <p>Low-income immigrants usually experience changes in employment or income status during the course of a year, but tax returns reflect only the prior years income. In these cases, individuals cannot document their change of income until they file the next years taxes. This creates a significant delay in the submission of an application for citizenship, which is already a very slow process. Additionally, many benefits linked to immigration status are time-sensitive, and some people cannot wait until the next income tax filing season to file their applications. This places undue burden on low-income immigrants.</p> <p>There is no question that this revision will only serve to impose another significant barrier on the constitutional right for a person to seek citizenship status. The federal government should be looking at options that would make the process go more smoothly not create additional restrictions.</p> <p>Thank you for your consideration of my comment.</p>

ID	Comment.	Commentor	Comment
186	USCIS-2010-0008-0332	Patricia Thompson	<p>I strongly oppose the proposed revision.</p> <p>If tax returns are the only acceptable way to verify income, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes. This leaves them with no way to prove their income and qualify for the fee waiver.</p> <p>Immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p>
187	USCIS-2010-0008-0328	Rachtha Danh	<p>I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p>

ID	Comment.	Commentor	Comment
188	USCIS-2010-0008-0329	Oksana B	<p>Please note that proposed changes would significantly impact the most vulnerable population. Many people who receive public benefits are exempt from the requirement to file a tax return. It would be extremely difficult and time consuming for them to obtain documents about their income if they have none. They would have to prove that something doesnt exist. Please note that state agencies that determine that someone is eligible for a public benefit already have appropriate screening techniques to determine persons income. Their determination should be accepted by USCIS because no better process currently exists. This proposed change would result in fewer poor people applying for immigration benefits they might need to climb out of poverty. This would also result in increased number of cases being rejected, resubmitted and inconsistently asjudicated. Proposed changes would compromise efficiency, not improve it.</p>
191	USCIS-2010-0008-0339	Catherine Rundell	<p>I strongly object to this new policy. Many elderly and low-income people are not required to file taxes, so they apply for the fee waiver with other currently approved methods of verifying income. This change will discriminate against low income individuals and prevent them from applying for US citizenship since they can't afford the high application fee.</p> <p>Have a heart! Your ancestors were once immigrants.</p>

ID	Comment.	Commentor	Comment
196	USCIS-2010-0008-0337	Whitney Kweskin	<p>The proposed rule would require people requesting fee waivers to prove their income, which the I-912 and I-942 already do. However, the only proof of income the USCIS lockboxes have been accepting is tax returns with proof of filing (so tax transcripts, in reality). People in dire need of a fee waiver often do not have the income level that requires them to file a tax return. Tax transcripts are not readily available to people without ready access to the internet, printers, or lines of credit (as transcript ordering is contingent on answering identity questions). This proposed rule would force the people with the least means to pay what are often astronomical fees for immigration benefits. Excluding the poor from adjustment of status or proving the citizenship of their children creates an underclass based entirely upon earning power which flies in the face of the idea of the American dream.</p>

ID	Comment.	Commentor	Comment
197	USCIS-2010-0008-0395	Christina Guros	<p>I wholeheartedly oppose the fee waiver rule change proposed by the Department of Homeland Security because it would waste tax payer money.</p> <p>The evidence USCIS proposes be used by individuals without income from employment is new and mostly would be gathered from other federal agencies. These include:</p> <p>Federal tax returns from thousands of individuals who previously were not required to file federal income taxes;</p> <p>Requests for copies of tax transcripts from those who do regularly file taxes but who receive public benefits so would previously not be required to submit a copy of the Federal tax return;</p> <p>Requests for copies of IRS Form 1099-G for those who have received unemployment benefits in the past year;</p> <p>Requests for copies of Form SSA-1099 from the Social Security Administration from individuals whose only income aside from public assistance is Social Security benefits;</p> <p>Requests for Verification of Non-filing status from the IRS; and</p> <p>Copies of the above documents from all household members.</p> <p>Not only will each applicant now be required to gather the above documents, but each member of their households will be required to gather and submit these documents. This could mean tens of thousands or more additional requests to the Internal Revenue Service and Social Security Administration. The Office of Management and Budget should investigate thoroughly the associated costs for each agency of the increase in requests for these documents.</p> <p>This rule change proposes no additional funding to these other federal agencies to compensate for their increased workload, and in fact provides no additional resources to supplement the additional time for USCIS officers to review the additional documentation listed above. For the waste of government officer time alone, I oppose this proposed rule change to the DHS fee waiver process.</p>
206	USCIS-2010-0008-0376	Hayley Bonsteel	<p>I oppose this change. If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. The same goes for seniors with the lowest incomes. This is bad policy and I am against the proposed changes.</p>

ID	Comment.	Commentor	Comment
207	USCIS-2010-0008-0373	Maya Ramakrishnan	If low-income individuals cannot demonstrate their eligibility with receipt of a means-based and means-tested benefit, many low-income individuals will be unable to use the I-912 fee waiver. Very low income people are not required to file federal income taxes, and do not have returns with which they could prove eligibility. Receipt of means-based, means-tested benefits from a state agency is the most common way that low-income individuals currently demonstrate that they are eligible for a fee waiver. This rule going into effect will make it much more difficult for low-income people to access the fee waivers they are entitled to. Having a variety of ways for low-income people to demonstrate their eligibility is important to make Form I-912 usable for its intended purpose.
214	USCIS-2010-0008-0348	Eva Conner	If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am categorically against the proposed changes for this reason.
220	USCIS-2010-0008-0404	Andrew Weisbecker	I object to the proposed revision to the fee waiver process. Many people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver. The proposed change appears to simply be another unjustified attempt to limit the number of persons who legitimately and deservedly should be allowed the privilege of US citizenship. Thanks, Andrew Weisbecker

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225	USCIS-2010-0008-0369	Nathan Perry	I strongly object to the proposed revision to the fee waiver process. There are many reasons why a person may not be required to file tax returns, including people who are retired. The current status of allowing such people to submit a letter proving they are receiving a means-tested benefit enables some of our most needy residents a much-needed avenue for proving their eligibility. Removing this method of proving eligibility will make it impossible for them to prove eligibility, and will harm some of our most vulnerable people.
237	USCIS-2010-0008-0389	Lynn Ludwig	It is CRITICAL that you do NOT make this change!! The poor and elderly do not have to file taxes. It is an unjust request for you to deny them fee waivers, or to deny them the option of using a benefits letter to qualify.
247	USCIS-2010-0008-0368	Mahika Rangnekar	The path to citizenship should be accessible to everyone, regardless of income, age, sex, gender identity and expression, religious affiliation, or ability. I oppose the proposed revision to the fee waiver process because it negatively impacts our most marginalized communities-- low-income, elderly, and communities of color. If tax returns are required for income verification, many low-income and elderly households who are not required to file federal income taxes have no way to prove their income and qualify for a fee waiver. This is why I object to the proposed revision to the fee waiver process.
251	USCIS-2010-0008-0370	Chris Garner	Our country should keep the path to citizenship accessible to everyone, regardless of income, age, sex, gender identity and expression, religious affiliation, or ability. I oppose the proposed revision to the fee waiver process because it would negatively impact our most marginalized communities-- low-income, elderly, and people of color. Many applicants from low-income or elderly households, who are not required to file federal income taxes, would have no way to prove their income to qualify for a fee waiver. This is why I object to the proposed revision to the fee waiver process.

ID	Comment.	Commentor	Comment
255	USCIS-2010-0008-0349	Sasha Anderson	<p>Hi,</p> <p>I do not approve this change. Given that not everyone is required to file federal income taxes, this will leave some applicants without the necessary documentation for the low-income fee waiver. If it's not required to be filed, it shouldn't be required for eligibility.</p> <p>I encourage you to maintain multiple options for income documentation for the fee waiver.</p> <p>Thank you, Sasha Anderson</p>
260	USCIS-2010-0008-0347	Caitlin Buhr	<p>Tax returns are not a possible way to verify income if the individual or family makes so little annually that they are exempt from federally filing. Proving income by showing letters of social security awards from the IRS should absolutely remain a means of applying for a fee waiver.</p>

ID	Comment.	Commentor	Comment
261	USCIS-2010-0008-0354	Christine Habeeb	<p>The proposed change to the form and information collection should not be made, and the concordant change in policy with respect to granting fee waivers based on receipt of means tested benefits should not be implemented. Anyone who has shown proof of need sufficient to establish receipt of a means tested benefit should be entitled to a fee waiver in their immigration-related forms and applications.</p> <p>As a practical matter, many people in the income brackets that would qualify for the fee waiver are unable to provide the tax returns required as the alternate means to receive a waiver because they are not required to file taxes. Timing deadlines may prevent them from waiting until the next year to file.</p> <p>The explanation that means tested benefits should be removed because the requirements for receipt of them varies by state is not compelling. There are dramatically different costs of living among states. Therefore the difference in income thresholds required to receive means-tested benefits understandably varies among states and does not in itself suggest inequity in the fee waiver process.</p> <p>One's immigration status should not depend on income; we should err on the side of increasing rather than decreasing ways to receive fee waivers to ensure that all people have a fair opportunity to apply for lawful citizenship, green card renewals, work permits, and any legal process offered in this country.</p>
576	USCIS-2010-0008-0711	Tara Martin Lopez	<p>Since low income people often do not file taxes, I oppose the change proposed that would require low income people filing for a fee waiver provide income verification in the form of a tax return.</p>
796	USCIS-2010-0008-1018	Lori Walls	<p>I oppose the proposed fee waiver process. Low-income individuals are not required to file tax returns. Making the filing of tax returns the basis for applying for the fee waiver is unconscionable. The fees have become exorbitant for many immigrants, and the new process will prevent many individuals from becoming citizens. The proposal is wrongheaded and unfair.</p>

ID	Comment.	Commentor	Comment
803	USCIS-2010-0008-1040	Ki Yong Pak	I oppose to the proposed change to the fee waiver eligibility. Because I don't have enough income, cost is too high .Already is impossible to income tax return.
804	USCIS-2010-0008-0871	Irene Danysh	am opposed to the newly proposed fee waiver process. Many immigrants with low income do not file tax returns, and they are not obligated to. Therefore, if tax returns become the only basis for applying for the fee waiver to become citizens, they will become ineligible through no fault of their own, and this would be extremely unfair to them, as they clearly would find it a huge hardship to come up with the large fee required to apply for citizenship. Thank you for listening.
876	USCIS-2010-0008-0760	Neal Kennedy	I oppose to the proposed change to the fee waiver eligibility. The proposed change makes it impossible for poor applicants who are not required to file an income tax return, these individual will not have a tax returns. And should a person's work situation changes such that they are now low income, that person will have to wait until the following year's tax year to file a tax return showing their eligibility for a fee waiver.
879	USCIS-2010-0008-0775	Frances Moulton	I am opposed to the proposed changes to fee waiver eligibility. This is a discriminatory change that will harm the most vulnerable, especially elderly residents who are not required to file taxes.
922	USCIS-2010-0008-0948	Chang Chong	I object to the proposed revision to the fee wavier process. Usually I am not required to file federal income taxes because I am retired without any income in US. I have a about \$700.00 coming from foreign country monthly and can not pay \$725.00 for citizenship application fee. It is too expensive. I hope this proposal does not pass.

ID	Comment.	Commentor	Comment
954	USCIS-2010-0008-1030	Sarah Paul	USCIS should not change the verification process for fee-waiver eligibility, as it will disproportionately impact people with the lowest incomes, who are most unable to pay the citizen application fee. If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. For this reason, among others, I am against the proposed changes.
1018	USCIS-2010-0008-1123	Anna Dong	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment

ID	Comment.	Commentor	Comment
153	USCIS-2010-0008-0303	Rachel Messeck	<p>I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is exorbitantly expensive for many people. I oppose the rule for these reasons:</p> <p>A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay. It does not take into account the varying burdens, responsibilities, and accountabilities an individual may have that would affect their need for the fee waiver. States and localities have already done a needs based test. USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed.</p> <p>This is an example of a systemically oppressive system designed to not allow people to become immigrants.</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>I do not understand why these regulations exist to oppress immigrant communities. The burden of \$725.00 is a lot of money for many families who deserve equal opportunity to contribute to the betterment of this country. We used to be a country that welcomed immigrants to this country and now we are a country that is ruled by hate and fear.</p>
174	USCIS-2010-0008-0320	Dori Cahn	<p>I oppose the proposed changes to the fee waiver program that will make it harder for many immigrants to prove eligibility for waivers. People have many reasons why they do not have tax returns to demonstrate their income status -- they may be students, retirees, living on SSI, elderly, and others who do not file tax returns. This change creates a barrier for people who are otherwise eligible to apply for citizenship. The cost of naturalization is already a hardship for many people; lack of alternative means to qualify for fee waivers will create a barrier for those least able to afford it.</p>

ID	Comment.	Commentor	Comment
443	USCIS-2010-0008-0567	Theresa Crecelius	<p>I oppose the proposed revisions to the fee waiver eligibility process. The changes will make it much more difficult to prove eligibility for the fee waiver because the income level to prove eligibility is above the income level where federal income taxes are required. You are asking poor immigrant families to file federal income taxes when they don't need to, which is an unnecessary barrier and burden for the families. By removing one of the ways to prove eligibility for the fee waiver you are taking \$100 million from poor, immigrant families pockets. The Statue of Liberty reads, "Give me your tired, your poor, your huddled masses yearning to breathe free..." It does not say, "Give me your rich people." We should be increasing the eligibility for the fee waivers to make it easier on poor people.</p>
460	USCIS-2010-0008-0613	Molly Frankel	<p>Because naturalized citizens add so much to our country, I am against the proposed regulation change which would make it much harder for low income applicants to apply for citizenship. Low income citizens who don't have a tax form to submit should maintain the ability to show a benefits letter.</p>
539	USCIS-2010-0008-0690	Johanna Martinez	<p>My name is Johanna Martinez and I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS.</p> <p>This change is not necessary and will unfairly burden applicants, especially the lowest-income, elderly and disabled people who are not required to file tax returns, because it will be difficult for them to prove their income. I oppose this rule because I recently talked to an elderly individual who wanted to apply for citizenship but has not been working for five years because he was helping care for his grandchildren and cannot recall where he last worked since it was so long ago. The citizenship application filing fee of \$725 is too expensive for him or his family.</p> <p>This would not be a good rule to enact.</p>

ID	Comment.	Commentor	Comment
599	USCIS-2010-0008-0931	Ji Sook Kim	<p>I am writing to oppose Regulation OMB Control number 1615-0116 issued by DHS/USCIS.</p> <p>If USCIS only accepts income tax returns as evidence for the fee waiver, I don't have to file income tax return because my income is under \$10,000.00 a year. It is hard for me to prove my income. This action would make it more difficult, if not impossible, for low-income people like myself to apply for citizenship. And also the citizenship application filing fee of \$725.00 is too much expensive for me to pay.</p>
600	USCIS-2010-0008-0947	Corinne Champagne	<p>I oppose the proposed change to the processing of Form I-912 for fee waivers (USCIS 2010-0008, OMB Control #1615-0116). The proposed change, by requiring tax returns to verify incomes, would create new barriers for low-income immigrants (e.g., elderly or student immigrants) who are not required to file tax returns.</p>
794	USCIS-2010-0008-1098	Bob Zeigler	<p>This change of removing fee waivers in the naturalization process makes it more financially difficult for low income immigrants to go through the process especially those who have not made enough to file for income taxes. This change is reverse "Robin Hoodism", stealing from the poor. I urge you not to proceed with this and continue all existing fee waivers.</p> <p>Thank you.</p> <p>Sincerely,</p> <p>Bob Zeigler 1102 A Creekwood Ct. SE Olympia, WA 98501 (360) 570-0848 zeiglerbob@msn.com</p>

ID	Comment.	Commentor	Comment
843	USCIS-2010-0008-0762	Giselle Carcamo	<p>Making it much harder for someone to prove their eligibility to apply for a fee waiver is simply causing an undue burden to an already very vulnerable population. Lets be honest and clear, not everybody has an income tax return available to submit as proof of eligibility for a fee waiver.</p> <p>I am concerned that this proposed legislation will particularly hurt low-income immigrants and their ability to become US citizens. Therefore, I oppose it.</p>
847	USCIS-2010-0008-0830	Dr J Donald	<p>Hello,</p> <p>I am writing because I STRONGLY object to the proposed revision to the fee waiver process. It is clearly an exploitation of people who have less ability to pay and appears to be obvious discrimination towards people who are trying to obtain citizenship.</p> <p>Many people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver</p>

ID	Comment.	Commentor	Comment
849	USCIS-2010-0008-0925	Lettie Kirk	<p>The is a Comment on the U.S. Citizenship and Immigration Services (USCIS) Notice: Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>For related information, Open Docket Folder</p> <p>Comment I object to the proposed change. Immigrants with the lowest incomes who rely on the currently accepted methods to verify their income to apply for the fee waiver should continue to have this as an option. Requiring the use of tax returns to verify income makes it more difficult as many low incomes individuals are not legally required to file tax returns. This will create an unfair burden and prevent them from applying for citizenships without the fee waiver.</p>
923	USCIS-2010-0008-0949	CJ Kennedy	<p>Please do not change the current way immigrants can prove low income so that they get a fee waiver to apply for citizenship. Many low income immigrants are not legally required to file taxes and would not have any way of using their tax returns as proof of income. This new change is set up to prevent these individuals from applying for citizenship.</p>
924	USCIS-2010-0008-0951	Chong Kang	<p>I object to the proposed revision to the fee waiver process. Many elderly people are not required to file taxes due to their low income, so they use the means tested benefits option in order to apply for the fee waiver. I only work part time and I can not afford to pay \$725.00 for applying citizenship fee. Sometimes I don't need to file an income tax return, it would be impossible for me to prove I am eligible for the fee waiver.</p> <p>If I become an American citizen in future, I will remain in US with confidence and start a business or buy a home.</p>

ID	Comment.	Commentor	Comment
960	USCIS-2010-0008-1038	Linnea Soo	I disagree with the proposed changes. People with the lowest income are dependent on these methods of verifying their income, without it they will not be able to apply for the fee waiver. It is unfair to use income and wealth to decide who should be a citizen. It is unacceptable to allow the government to decide what it means to be an American citizen that is based on socioeconomic class, and quite frankly, race.
963	USCIS-2010-0008-1042	Norma Ramirez	I oppose the proposed change to the fee waiver process. This will make it impossible for very low-income people, including many elderly people, to prove their income because their income is so low that the government advises them not to file an income tax return. With this change, these people would have no way of verifying their income. Sincerely, Norma Ramirez 819 N. Washington Street Tacoma, WA 98406
967	USCIS-2010-0008-1048	Mary Wieth	Changing the waiver eligibility will result in low income immigrants unable to prove that they are eligible for fee waiver. These people do not earn enough money and are therefore not legally required to file tax returns. Without the fee waiver, they will not be able to afford the application fee for citizenship thus preventing them from becoming US citizens. They are being punished for being poor. I am strongly against this discriminatory policy.

ID	Comment.	Commentor	Comment
969	USCIS-2010-0008-1050	Sarang Sekhvat, Massachusetts Immigrant and Refugee Advocacy Coalition	<p>Comment part 1: November 27, 2018</p> <p>Massachusetts Immigrant & Refugee Advocacy Coalition 105 CHAUNCY STREET 9TH FLOOR BOSTON, MA 02111 VOICE: 617.350.5480 FAX: 617.350.5499 WWW.MIRACOALITION.ORG Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Ave, NW Washington, DC 20529-2140 Re: OMB Control Number 1615-0116 US Citizenship and Immigration Services, Department of Homeland Security Docket ID USCIS-2010-0008</p> <p>Dear Ms. Deshommes;</p> <p>The Massachusetts Immigrant and Refugee Advocacy Coalition (MIRA) submits this comment in opposition to the above referenced proposed revision to the 1-912, Request for Fee Waiver. MIRA is the largest coalition in New England promoting the rights and integration of immigrants and refugees. With offices in Massachusetts and New Hampshire, we advance this mission through education and training, leadership development, institutional organizing, strategic communications, policy analysis and advocacy. For most of our existence, MIRA has provided technical support to organizations in New England who provide citizenship assistance and has provided direct naturalization services for the past 7</p>
975	USCIS-2010-0008-1057	CJ Kennedy	<p>The proposed rules makes no sense and should not be implemented.</p> <p>These changes will result in immigrants with the lowest income not be able to demonstrate their income as they are not required to file tax returns, thereby disqualifying them for fee waiver. Such changes create unnecessary barriers to a meaningful path to legal residency and citizenship.</p>

ID	Comment.	Commentor	Comment
984	USCIS-2010-0008-1072	Charlie Moulton	I strongly oppose the change in the requirement to the fee waiver eligibility process. It is morally wrong to punish people already in vulnerable economic situations by eliminating current verification procedures, requiring them to show income status with tax returns which they are not legally required to file, thus making it more difficult for them to obtain a fee waiver for their citizenship applicatio
987	USCIS-2010-0008-1076	Upama KC	The proposed rule will be an unsurmountable burden for low income clients especially elderly and disabled individuals of proving that they did not file income tax returns. We have to empower such clients by making it easier for such clients to access benefits that they are deemed eligible by the state government. Why does DHS want to make it harder for such individuals to access such benefits?
989	USCIS-2010-0008-1080	Upama KC	I strongly oppose the proposed revision of the fee waiver because it will be extremely burdensome for clients to prove their low-income status. I work with many elderly clients who do not need to file taxes because they do not work or they have very low income and arent required to file. These clients will not have any documents to prove their low-income status and would not be able to apply for a benefit that they would technically be eligible for. These changes will make it almost impossible for such clients to show that they are low income.
991	USCIS-2010-0008-1083	Vicki Au	I strongly oppose the proposed revision to the fee waiver process. Using only tax returns for income verification will affect all people with the lowest incomes who are not required to file federal income tax returns. These people will have no way to prove their income and qualify for the fee waiter. USCIS is essentially punishing individuals and families applying for citizenship simply because they are poor.

ID	Comment.	Commentor	Comment
1002	USCIS-2010-0008-1097	Polly Choi	<p>The lowest income families are not legally required to file tax returns.</p> <p>This proposed policy change mandating the use of tax returns for fee waiver eligibility will make it harder for these families to receive a fee waiver for their citizenship application. Immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. This policy is discriminatory and should not be implemented.</p>
1024	USCIS-2010-0008-1134	Kent Sundberg	<p>I strongly object to the proposed revision to the fee waiver process. Often people with low incomes do not need to file taxes and must use other methods to verify their incomes in order to apply for a fee waiver. Changing verification requirements would make it impossible for many otherwise qualified people to demonstrate eligibility for a waiver. A change would be likely to affect elderly people, those who are changing jobs, and others, including parents of wholly dependent minors who are American citizens. Meeting naturalization and citizenship requirements is already quite demanding; there is no need to add additional barriers which would not improve public safety, prosperity or express fundamental American values.</p>
1026	USCIS-2010-0008-1137	Toni Cross	<p>Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment</p>
1036	USCIS-2010-0008-1151	Mason Lim	<p>The proposed changes to the fee waiver eligibility is bad because it targets the low income immigrants, many of whom are not legally required to file income taxes. This means that some low-income immigrants that are legally eligible for the fee waiver will be unable to prove that they are eligible. This could prevent them from applying to become US citizens because they cannot afford the fee!</p>

ID	Comment.	Commentor	Comment
1086	USCIS-2010-0008-1206	delle Hammond- Sass, Idelle Hammod- Sass Design	RE:1615-0116 USCIS-2010-0008. I am upset that the fees of applying for citizenship may become a barrier to becoming an American Citizen. Being a useful member of a society is measured in many ways, including being a parent with the right to vote and advocate for your child and community. Proof of need to waive fees should include public assistance and other programs. The people who have applied for citizenship are valuable members of society. They deserve dignity and respect for who they are, what they have sacrificed to become Americans, and they will inspire theri families to work hard and get an education.
1092	USCIS-2010-0008-1212	Pui-Yan Lam	<p>I strongly oppose the proposed revision because it will disproportionately affect the most vulnerable populations.</p> <p>Immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waive. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>In addition, many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p> <p>It is beneficial for the United States to have more of our immigrants to become naturalized citizens so that they can participate fully in the civic life here. USCIS should not create additional barriers that prevent immigrants from becoming U.S. citizens.</p>

ID	Comment.	Commentor	Comment
1163	USCIS-2010-0008-1118	Laura Vazquez, UnidosUS	<p>Comment part 2: Negative Impact on Individuals Ability to Apply for Benefits for Which They Are Eligible</p> <p>This proposed rule narrows the universe of evidence that can be submitted to prove eligibility for a fee waiver, thus discouraging eligible individuals from filing for fee waivers and immigration benefits. Because the filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application, any opportunity to mitigate the costs associated with filing should be designed to ease, not exacerbate, these obstacles.</p> <p>Under the proposed changes, the applicant must procure additional new documents, including a federal tax transcript from the LRS to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. The increased requirements and additional evidence to be collected from applicants in order to file for a fee waiver will extend the time and work required for applicants to complete (and adjudicators to process) the fee waiver form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the process more complicated and could lead to applicants making mistakes, thus adding to the processing time of the application. Receipt of a means-tested benefit is a straightforward, economical threshold that takes advantage of the work local and state adjudicators have already invested in reviewing records, instead of requiring federal adjudicators to repeat it.</p> <p>In addition to discouraging permanent residents from applying for naturalization by requiring more documentation, many permanent residents would forego the expense of pursuing naturalization, because of the greater uncertainty from the proposed change. Receipt of a meanstested benefit is reliably competent evidence of qualification for a fee waiver, whereas adjudicators' evaluation of income and financial hardship would be more subjective, and the results less predictable. Fewer permanent residents would begin a more effort-intensive process that promised less assurance of success.</p> <p>A decrease in the number of people naturalizing would have negative consequences for</p>

ID	Comment.	Commentor	Comment
434	USCIS-2010-0008-0542	Maribel Montes de Oca	<p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver.</p> <p>USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>Our current immigration system, sturcture, laws and policies are inaccessible and confusing. I urge you not to continue to add additional barriers to individuals and families that have already had to navigate confusing and dangersous spaces to get to this process. I oppose the proposed revision.</p>
467	USCIS-2010-0008-0665	Elizabeth Sims	<p>I oppose this proposed regulation. Most, if not all, low income people, immigrants as well as native born Americans, do not file income taxes because they do not have income to make it necessary. The authors of this resolution are either ignorant of this reality or knowingly intend to increase the difficulty of becoming a US citizen. Either is disgraceful for public officials.</p>
516	USCIS-2010-0008-0626	Dianne Chui	<p>The proposed changes to the fee waiver eligibility is a bad idea because it will be harmful to low income immigrants, many of whom are not legally required to file income taxes. This means that some low-income immigrants that are legally eligible for the fee waiver will be unable to prove that they are eligible. This could result in their not applying to become US citizens because they cannot afford the fee!</p>

ID	Comment.	Commentor	Comment
527	USCIS-2010-0008-0605	Jay Stickler	I believe immigrants with the lowest incomes who rely on the currently accepted methods to verify their income so they can apply for the fee waiver should continue to have this option. USCIS should not punish families with the lowest incomes by changing verification methods and making it more difficult to receive a fee waiver for their citizenship application. Please, on behalf of justice and fairness, do not change the waiver which is in place.
547	USCIS-2010-0008-0713	Christina McLeod	I oppose the proposed changes. Changes proposed adversely affect low income immigrants, many of whom are advised, like low income citizens not to file tax returns. If tax return, then is the documentation needed to show low income in order to apply for/qualify for fee waivers, then it logically adversely impacts these immigrants. Unintended consequences, especially those which adversely affect a group of persons, and may have Title VI implications, should not be adopted.
554	USCIS-2010-0008-0684	Connie Burk	I oppose the proposed changes. Our nation is stronger when we welcome immigrant families. These changes will weaken our country. Immigrants with the lowest incomes, including youth and the elderly, who may not be required to file income tax form, will not have a way to demonstrate their income and will face barriers when seeking a fee waiver. Such changes create harmful obstacles to a meaningful path to legal residency and citizenship. These proposed rules should not be implemented.

ID	Comment.	Commentor	Comment
574	USCIS-2010-0008-0702	Ruth Egger	I am writing to urge you to not change the way immigrants can prove low income so that they get a fee waiver to apply for citizenship. I worked with multi ethnic older adults, especially Vietnamese and Filipinos who came to live with their children who supported them for their first 5 years in this country. They do not have an income to file taxes and would not have any way of using their tax returns as proof of income. Please be compassionate. These people have suffered enough and need assistance not deterrents.
583	USCIS-2010-0008-0698	Gerald Wasser	<p>As the son of immigrants to the USA,I object to this change.</p> <p>Waiving certain immigration fees, such as the application for citizenship and some applications for a green card for those who have established financial need is an important way to maintain equity, justice, and opportunity.</p> <p>Eliminating the benefit would unfairly impact members of our communities who are low-income, students, and the elderly as many in these groups are not required to file taxes and would, therefore, be unable to prove their eligibility for the fee waiver. To change the verification process would be to punish those who are less fortunate.</p>
628	USCIS-2010-0008-0761	Lettie Kirk	I oppose the proposed change to the fee waiver eligibility. It will be harmful to low income immigrants who are not legally required to file income taxes. Low-income immigrants that are legally eligible for the fee waiver will not be able to prove that they are eligible as a result. This could prevent them from applying to become US citizens because they cannot afford the fee!

ID	Comment.	Commentor	Comment
656	USCIS-2010-0008-0894	Kirsten Harris- Talley	Our immigration system needs revisions, but using tax returns as the sole verification is not the answer. If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed change. I strongly oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application. Please, do not make this change.
671	USCIS-2010-0008-0769	Chelsea Sweeney	I oppose the proposal to change the fee waiver process at USCIS. The proposed changes will make it more difficult for low-income families and individuals to apply for the fee waiver and proceed with the citizenship process. If income verification is limited to using tax returns, individuals and families who do not file income taxes due to their low income will not be able to use this method to prove their income status. They need the full range of income verification options currently offered by USCIS to apply for the fee waiver. Immigrants make this country better and we should not restrict the pathways to citizenship used by low-income families.

ID	Comment.	Commentor	Comment
685	USCIS-2010-0008-0891	Jane Huntington	<p>I am a retired physician. I know many patients who have become US citizens - a process that is incredibly important and meaningful for immigrants to our country. The proposal to use income tax returns as the only method for proving income in order to qualify for a waiver of fees would unfairly discriminate against low-income applicants. Citizenship applicants with low incomes may not have to file income taxes. Currently they can use other means to verify their need for a fee waiver. I object to a change in the rules for verifying income. Citizenship should be a process open to all immigrants not just those who file income taxes.</p>
724	USCIS-2010-0008-0908	Ingrid Sojit	<p>I volunteer as an English learning instruction assistant and Spanish/English language interpreter with One America. I work with many immigrant applying for citizenship helping them with language related issues and getting to now then on a personal level.</p> <p>It would affect long income applicants. The elderly and one living in larger more expensive cities and one who has difficulty providing adequate income verification. It is important to our community that the citizenship application process to be a fair and inclusive as possible.</p>

ID	Comment.	Commentor	Comment
725	USCIS-2010-0008-0900	Anonymous and Concerned US CITIZEN	<p>I am personally, and vehemently in opposition to the proposed revision because the most vulnerable immigrants with the lowest incomes rely on the presently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes (made so by our own unjust systems that disadvantage people based on many factors over which they have no control, like skin color and national origin) by eliminating current verification methods. We exempt people whose income is too low from filing a tax return, but now there is a proposal to require immigrants that would not typically need o file a tax return to have one to prove their income? Why? What ethical and moral good does the change facilitate? I say this because, money, from those already low in income is not an ethical reason, and this appears to be the only clear motivation. And that is not in good faith, or in service of the United States of America I have called home, with my ancestors, since the 1600s. It will create unnecessary and significant barriers for these humans who we should be offering hospitality and belonging to--not exploitation and discrimination --to receive a fee waiver for their citizenship application. Our economy rests on, and often breaks the backs of low-wage workers that include these immigrants. We owe them and the millions of Americans who work alongside them respect and gratitude, not a greedy hand out for money, simply to pursue their right to legal citizenship. "What time is it on the clock of the world?" as Grace Lee Boggs would say. Time to deal justly with the people who keep our nation and economy afloat with labor that is often underpaid, and respect to those elderly immigrants who have already worked hard through their lives.</p>
841	USCIS-2010-0008-0988	Bryan Hayes	<p>The proposed changes to the fee waiver eligibility process is a bad idea because it will be harmful to low-income immigrants, many of whom are not legally required to file income taxes. This means the low-income immigrants that are legally eligible for the fee waiver will be unable to prove that they are eligible. This could result in their not applying to become US citizens because they cannot afford the fee</p>

ID	Comment.	Commentor	Comment
1095	USCIS-2010-0008-1216	Iris Antman	<p>To Whom it may concern:</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p> <p>Please be fair to these immigrants who are working hard to become committed U.S. citizens. Thank you.</p> <p>Sincerely, Iris Antman Seattle, WA</p>

ID	Comment.	Commentor	Comment
425	USCIS-2010-0008-0592	Sarah Wang	I believe this proposed change, regarding the removal of means tested benefits as a way to earn a fee waiver I912, is fundamentally wrong. Removing the means tested benefits leaves only tax returns/ statements about someone's income as the sole method of obtaining an I912. People who do not earn enough to qualify for submitting tax returns (extremely poor) and elderly are left with no way to prove that their income qualifies for a fee waiver-under the proposed changes. This leaves a vulnerable population in dire need of financial assistance without a means to obtain an I912. Without a fee waiver individuals under financial strain cannot apply for citizenship or get their applications for several other immigration and naturalization processes approved. This leaves them in an even more vulnerable state without a means to alleviate the financial burden of applying for citizenship.

ID	Comment.	Commentor	Comment
512	USCIS-2010-0008-0659	Lindsay Diallo	<p>I object to the proposed changes to the fee waiver eligibility process because it will likely have an adverse outcome for low-income immigrants in our community. Since many of these low-income immigrants are not legally required to file income taxes, those who are legally eligible for the fee waiver will be unable to prove that they are eligible. This may result in their not applying to become U.S. citizens because they cannot afford the fee. We should be making the fee waiver accessible to low-income immigrants, since typically, U.S. citizens are able to earn higher incomes than green card holders. It is bad for all Americans when green hard holders are not able to afford to become citizens.</p> <p>Additionally, the proposed change is wasteful, at a time when processing of applications is already taking longer than ever. When low-income immigrants are required to use their tax returns to demonstrate their eligibility as well the state-issued, means-tested benefit letters, then their income status is being verified a second time, at the federal level, IF they filed tax returns. This is wasteful and unnecessary. I do not appreciate such waste of my tax dollars.</p>
528	USCIS-2010-0008-0639	Elizabeth Kennedy	<p>I oppose the revised fee waiver policy. Current verified method of proving income using the means-tested benefits letter works just fine. Many low income individuals, seniors and individuals receiving SSI are not required to file tax returns. This policy change will produce undue hardships for many and prevent them from becoming US citizens.</p>

ID	Comment.	Commentor	Comment
636	USCIS-2010-0008-0748	Mary Kessler	<p>My name is Mary Loraine Kessler, and I'm a concerned citizen urging the Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at my first citizenship clinic this year, because lack of legal advice should not be barrier for permanent residents wishing to become US Citizens. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people.</p> <p>I volunteer at the WNA clinics because they fill the gap in legal services for low income clients. But we just meet with clients for the one day. Demand for services is high and we dont have the time or resources to document income in the way the proposed regulation would require. We would end up serving fewer people. We would have to refer these people out who cannot afford legal services, and they may end up not applying at all.</p> <p>Furthermore, this rule change adds is unnecessarily expensive to our government. If our taxes are already paying state or local benefits-granting agencies to thoroughly verify household income for those applying for benefits, why does USCIS want to redo this work? USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed, especially when N-400 processing times are at a historic high.</p> <p>For individuals who are not required to file taxes, because they do not work or earn enough to be required to, there is no clear way to establish eligibility for a fee waiver. The piecemeal evidence that these individuals will provide will likely rejected as insufficient by USCIS. It is difficult to become an American citizen, and permanent residents who are working hard to become citizens should not be kept from citizenship because they don't have tax documentation that they were never required to file. Creating a maze like that is antithetical to good governance and does not represent American values.</p> <p>Inability to naturalize makes family unification less likely and weakens families. American values should include equal access to immigration and citizenship benefits regardless of wealth. This rule violates that value.</p>
693	USCIS-2010-0008-0735	Ka Si Moulton	<p>I am opposed to the proposed changes to the fee waiver eligibility.</p> <p>Many families with the lowest incomes use the means-tested benefit letter to verify their income to receive a fee waiver for their citizenship application. By requiring them to verify their income using tax returns, people with the lowest incomes will not be able to prove their income status as they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. Without the fee waiver, they will not be able to afford the application fee for their citizenship application.</p>

ID	Comment.	Commentor	Comment
654	USCIS-2010-0008-0752	Carlos Martinez	<p>I strongly and adamantly urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I work with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have worked with the program for over two years. I help at these workshops because citizenship should be accessible to all regardless of economic background. The fee to apply for citizenship is \$725 which does not include legal fees from private attorneys. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons:</p> <p>Naturalizing makes people less likely to need public benefits, but prohibiting applicants to use proof of public benefits to qualify for the fee waiver will make them less likely to be able to naturalize. Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages, than their non-naturalized foreign-born peers. Naturalization, on average, accounts for an 8-11% increase in wages, which results in higher spending and state and local taxes paid. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply.</p> <p>If our taxes are already paying state or local benefits-granting agencies to thoroughly verify household income for those applying for benefits, why does USCIS want to redo this work? USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed, especially when N-400 processing times are at a historic high.</p> <p>For individuals who are not required to file taxes, because they do not work or earn enough to be required to, there is no clear way to establish eligibility for a fee waiver. The piecemeal evidence that these individuals will provide will likely be rejected as insufficient by USCIS. Some applicants may try to submit again, which requires additional time and money to prepare and review.</p> <p>The regulation says that someone should obtain their wage transcripts from the IRS as proof of income. However, in order to obtain a wage transcript online, you have to have a credit card, a vehicle loan or a mortgage for identification purposes. The vast majority of low-income applicants we serve do not have any of those, and would have to request their transcript by mail, which takes 5-10 business days. Low-income immigrants that cannot obtain wage transcripts are unlikely to come forward with all the</p>

ID	Comment.	Commentor	Comment
531	USCIS-2010-0008-0671	Adelina Solis	<p>Despite the asserted goal of simplifying procedures and reducing paperwork, taking away the means-tested benefits way of qualifying for fee waivers will cause people who would previously have qualified that way to have to gather extensive documentation for either tax- or hardship-based qualification, which would therefore result in an increased volume and complexity of the paperwork presented to USCIS. With this in mind, it is clear that the claimed objective is a baseless claim meant to obscure the fact that this proposed regulation change is yet another way of targeting immigrants and those who are least able to advocate for themselves. Slashing the ways in which people can qualify for fee waivers, not acknowledging the real complexities of poverty across the country (whose nuance is inadequately addressed by the federal poverty line standard), ultimately amounts to a poll tax that will tamp down the possible future voting pool and perpetuate disenfranchisement</p>

ID	Comment.	Commentor	Comment
540	USCIS-2010-0008-0692	Anita MacGillivray	<p>Document Citation: 83 FR 49120 Agency/Docket Number: OMB Control Number 1615-0116 Document Number: 2018-21101</p> <p>To Whom It May Concern,</p> <p>I am writing to strongly oppose the fee waiver rule because it is punitive, unnecessary and will place an undue burden on those intended to benefit from the waiver as well as the various agencies supporting those working toward citizenship.</p> <p>High fees should not be a barrier to those who wish to become citizens and contribute to our society. The fee waiver, currently supported by providing proof of income assistance, provides a relatively straight forward way of providing proof of need for assistance and removal of the fee barrier. By changing the rule to require proof via income tax returns, the government is making it far more laborious and difficult, and at times impossible, to provide proof due to those not earning enough to file taxes not having the required documentation. In addition, this revision will add to the huge backlog of cases already waiting to be processed and will impose huge costs and diversion of time on agencies assisting low income immigrants.</p> <p>Considering the current administrations view of immigrants, it's likely that the ramifications of the rule are intentional. I strongly urge the administration to withdraw this proposed revision to revise the form I-912. Please do not make it any harder than it already is for immigrants to naturalize.</p> <p>Thank you for your consideration.</p>

ID	Comment.	Commentor	Comment
596	USCIS-2010-0008-0809	Luke Williams	<p>The proposed changes to the fee waiver eligibility process are ill-advised primarily because it will be harmful to low-income immigrants, many of whom are not legally required to file income taxes. This means that some low-income immigrants that are legally eligible for the fee waiver will be unable to prove that they are eligible. Thus, the end result would be that many eligible immigrants will not apply to become U.S. citizens because they cannot afford the fee. We should be doing everything that we can to make the fee waiver accessible to low-income immigrants who the United States has already determined can legally be in the country permanently, but for whatever reason (family circumstances, disability, sickness, etc.) cannot currently afford the fee to naturalize. It makes no sense to add a wasteful step of bureaucratic red tape when these applicants are already screened by an effective system of means-testing conducted by state workers. In other words, this is a bad proposed change to regulation both because it is harmful to lawful permanent residents (and their family members), and because it is an unnecessary waste of taxpayer dollars.</p>
629	USCIS-2010-0008-0812	Nancy Flores	<p>I vehemently oppose the proposed regulations that will eliminate the means-tested benefit category as a way to demonstrate eligibility for a fee waiver. Applicants would instead have to undergo a much more onerous review of financial hardship and/or income below the poverty guidelines, resulting in thousands of Legal Permanent Residents not likely applying to Naturalize, even those with US citizen family members who may qualify for means tested benefits. These proposed regulations unfairly target potential US citizens based on income and/or social class. All Legal Permanent Residents meeting the qualifications and requirements for Naturalization, should be allowed to do so regardless of income level or dependence (or not) on means tested benefits.</p>

ID	Comment.	Commentor	Comment
988	USCIS-2010-0008-1077	Upama KC	<p>The time of year of filing for naturalization and requesting a fee waiver may not be consistent with an individuals most recent tax filings. I worked with a client who lost her job and no longer made the income that she made in her most recent year. She was eligible for food stamps because state department checked her current income and did not just rely on her most recent tax return. How would clients like her prove that they are currently low income when they reported a higher income in the tax return?</p>
992	USCIS-2010-0008-1084	Colleen Webster	<p>I write to voice my opposition to this change. As one who has worked with immigrants through their naturalization process, I understand a) what a burden the filing fee is for most individuals, much less multiple members of a family; b) how difficult it is for low income green card holders to file income tax for the sole purpose of applying for a waver. Why do you not trust the word of federal agency workers to vouch for an applicant's income? The data is already in government files; you need only access tgem.</p> <p>This is a thinly veiled attempt to diminish the number of immigrant citizens in our immigrant nation. It is an act of hatred, and history will condemn you and every cog in your wheels of hate.</p>

ID	Comment.	Commentor	Comment
1007	USCIS-2010-0008-1104	Alexandra Olins	I oppose the proposed change to the processing of Form I-912 for fee waivers (USCIS 2010-0008, OMB Control #1615-0116). Eliminating receipt of public benefits as a valid criterion for fee waiver eligibility forces applicants for the waiver to undergo a much more complicated and onerous process of establishing that their income levels warrant the waiver via filing a federal income tax return, which people earning below a certain income threshold are not required to do. How would those people prove their eligibility? Why would we want to make this process more complicated? This rule change would make it more difficult, not easier, for legal immigrants to become citizens. Our country should do everything possible to encourage legal immigrants to further knit themselves into the fabric of our country by becoming citizens. We should not create barriers and obstacles that make it harder to do so. Please withdraw this proposed change, which is not in keeping with the mission & spirit of USCIS.
1082	USCIS-2010-0008-1202	Ursula Mehl	As a United States citizen, I wholeheartedly disagree with this proposal. What we need to be doing is making it easier for people to apply for citizenship, but this does the opposite of that. It eliminates an individuals ability to use proof of receipt of means-tested benefits to demonstrate inability to pay application fees for various forms. Instead, individuals will need to get a federal tax transcript from the IRS that demonstrates that their household income is at less than of equal to 150% of the federal poverty level. Theres no logical reason why these extra steps need to be in place - USCIS hasnt shown that they are currently granting fed waivers to people who dont need them. Its a solution to a problem that doesnt exist. Individuals who are receiving means-tested benefits from the government have already passed a thorough income eligibility screening, they dont need to jump through more hoops for USCIS. The fee waiver process should stay as it is.

ID	Comment.	Commentor	Comment
1085	USCIS-2010-0008-1205	Elaine Ramos	<p>To Whom It May Concern:</p> <p>This change to fee waivers is an attempt to ensure that only wealthy persons can remain and get the vote and it harms mixed status (families where there are U.S. citizen children, for example, and an immigrant parent) low income families.</p> <p>Two groups of already vulnerable immigrants face additional barriers to lawful residency in the U.S.: 1) Unemployed immigrants without proof of income below the poverty line, and 2) Working immigrants who receive incomes high enough to place them slightly above the low threshold, but low enough to qualify for means-tested benefits from their state.</p> <p>I respectfully urge the USCIS to not move forward with this change to fee waivers.</p>
418	USCIS-2010-0008-0576	Carol Mooney	<p>We want people to be US citizens. Many immigrants are struggling to survive and don't have extra income available to pay application fees. They don't make enough money to need to file income tax. Changing the regulations so benefit letters can't be used wastes federal money to process papers. There is no need to do this. Please leave the regulation the way it is so there are several options for papers to verify income qualification. Thank you.</p>

ID	Comment.	Commentor	Comment
985	USCIS-2010-0008-1074	Emily Leung, Justice Center of Southeast Massachusetts LLC	<p>Comment part 1: Submitted via www.regulations.gov November 27, 2018</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008-0144 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Justice Center of Southeast Massachusetts in strong opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Justice Center of Southeast Massachusetts, a subsidiary of South Coastal Counties Legal Services, provides free civil legal services to indigent and elderly individuals in our service area. We serve communities in Plymouth, Bristol, Dukes, Nantucket, and Barnstable Counties, as well as residents of the towns of Avon and Stoughton. Our mission is to achieve equal justice for the poor and disadvantaged through community based legal advocacy. The Justice Center of Southeast Massachusetts provides civil legal services in the areas of housing, family law, education, immigration, and benefits. Our immigration practice serves low-income individuals applying for relief in a wide range of cases, including asylum seekers, Special Immigrant Juveniles, victims and survivors of crime, including trafficking, individuals renewing Temporary Protected Status, and numerous other immigrant populations that would be adversely affected by</p>

ID	Comment.	Commentor	Comment
741	USCIS-2010-0008-0889	Anonymous Anonymous	<p>I strongly oppose the proposed fee waiver rule because I am an immigrant and I know all too well how terrifying and heart-wrenching it may be to be at risk of losing your legal stay in the US. Many of us came from countries where our lives were at risk, especially if we were to return to them and be seen as traitors.</p> <p>I am fortunate enough to be able to afford the renewal fees, but I know that many of my fellow immigrants are not. Many people might have fallen on hard times since coming her, or are at a disadvantage in the job market. For many of us, this fee could mean the difference between life in the US and death in our birth countries.</p> <p>The proposed workarounds to the fee aren't any better: Income based waivers are highly technical documents that indigent immigrants might not be able to fill or process, even if they had the required information (which many don't). Getting it filed by a third party could incur additional expenses or loss of income as well.</p> <p>From the government's side, this procedure will only worsen USCIS' case backlog, which is already notoriously large. It will also impose additional and unnecessary costs to all processing centers and require the DOJ to dedicate task forces to enforce it as well as go after low-income immigrants who would suddenly be in violation of the terms.</p> <p>There is simply no upside to this proposal: It persecutes the most vulnerable class of immigrants, increases governmental costs and burdens, and marks the US out as a xenophobic and classist country. We're better than this.</p>

ID	Comment.	Commentor	Comment
166	USCIS-2010-0008-0312	Jerry Pedron	<p>There already exists thorough ways verifying low-income, means tested-eligibility status in the form of state-verified eligibility letters. It is one of three tools currently approved by the USCIS (United States Citizenship and Immigration Service):</p> <ul style="list-style-type: none">- Tax returns- State-verified eligibility letter(s)- Financial hardship letter (rarely approved) <p>For all practical purposes then, there are only two tools.</p> <p>Fewer tools do not bode well for doing a better job.</p> <p>As stated elsewhere, many low-income people are not required to even file tax returns. We are thus left with no tool.</p> <p>No tool does not bode well for getting a job done.</p> <p>Thank you.</p>
228	USCIS-2010-0008-0357	ATIM OTII	<p>I oppose this change in the fee waiver policy. I work at a resettlement agency, where under the Resettlement and Placement contracts with DOS - PRM, we are mandated to apply for public assistance for refugees and asylees, among other ORR eligible clients. These immigrant populations and others identified by ORR may not be required to file a federal or state tax return, and therefore are left with no other means of showing need to request a fee waiver. This rule would disproportionately discriminate against low income, elderly, and disabled individuals. This new rule would also result in otherwise eligible immigrants not being able to adjust their status to lawful permanent residents or naturalize.</p> <p>Please maintain the fee waiver for low-income families and individuals</p>

ID	Comment.	Commentor	Comment
241	USCIS-2010-0008-0352	Sydney Miyahara	If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.
440	USCIS-2010-0008-0548	Brian Huseby	I oppose the proposed changes to the citizen application fee waiver process. Low income applicants can not afford the higher fee and have little means to document their income.
442	USCIS-2010-0008-0555	John Horn	I am against the fee waiver changes because I feel that it would negatively affect immigrants who can't afford the fees but don't file federal taxes.
533	USCIS-2010-0008-0670	Sandra Organ	Why is this necessary to alter eligibility requirements for those pursuing waivers for fees? Those working some of those least paid jobs that we need filling shouldn't have an undue burden in pursuing legal immigration to stay here. It's like squeezing blood from a turnip. Requiring tax returns from someone who doesn't earn enough to pay them isn't fair, especially when we cannot get our president to show his to prove he isn't beholden to other nations. Please come up with better solutions to make this process less restrictive, less influenced by racist attitudes and inconsiderate leadership.
534	USCIS-2010-0008-0669	Jack Smith	I am against the changes for the following reason: It can be quite difficult for a poor person to prove their income with a tax return, which will lead to them being denied the waiver, even though they are the very folks who need it the most.
561	USCIS-2010-0008-0714	Beverly Smaby	It would be a terrible injustice to require applicants for naturalization to submit a tax return to qualify for a waiver of the naturalization fee. This would disqualify the very people most in need of the waiver since the IRS advises people with very low income to not submit a return. That's not fair!!

ID	Comment.	Commentor	Comment
570	USCIS-2010-0008-0705	Sophia Hoover	I am against the proposed changes to fee waiver eligibility. This will be a discriminatory change that will harm the most vulnerable, especially elderly residents who no longer file taxes. I oppose this suggested change.
625	USCIS-2010-0008-0753	Erin Kennedy	I am opposed to the proposed change to the fee waiver eligibility. It would negatively affect immigrants who can't afford the fees but are not legally required to file federal taxes.
687	USCIS-2010-0008-0939	Cathy Partida	<p>The proposed changes to the fee required in order to complete the citizenship process are unfair. Many folks will not have made enough money to file an income tax return although they work quite hard. They should not be held against them. There is a lot of documentation demonstrating that immigrants add to the fabric of our nation financially educationally and morally.</p> <p>These times are difficult enough without adding further complexity to the work that these striving individuals do .</p>
711	USCIS-2010-0008-1000	Chad Au	Many low-income immigrants are not required to file federal tax returns. By making this the only way to obtain a fee waiver, this regulation would impose an unnecessary burden for the most vulnerable. In addition, if an individual's situation changes and, at the time of fee application has no job or a much lower paying job entitling them to a waiver, requiring reliance on the previous year's income tax return will deprive that person of a waiver to which they are entitled. I strongly opposed to this new policy.
715	USCIS-2010-0008-0923	Savannah Farrell	It is a bad policy to require submission of a tax return to determine eligibility for the fee waiver. This would disqualify the very people most in need of the waiver since individuals with very low income are not legally required to file a tax returns. Please leave the currently accepted method of income verification in place.

ID	Comment.	Commentor	Comment
721	USCIS-2010-0008-0866	Michael Pierson	<p>I strongly object to the proposed change in the rules related to exemptions. Many low-income people do not file tax returns, even though working, for a variety of very good and acceptable reasons. I do not want to see further obstacles placed in the path of persons motivated to become citizens and otherwise be successful and contributing Americans.</p> <p>Thank you for your consideration.</p>
873	USCIS-2010-0008-0737	CJ Kennedy	I object to the proposed change to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes and use other accepted methods to verify their incomes to apply for the fee waiver. This new requirement would make it impossible for many to prove their eligibility for fee waive
874	USCIS-2010-0008-0740	Darin Farrell	I oppose to the new policy. The changes to require low income immigrants to provide a federal tax return when they are not required to file one creates unnecessary burden to an already hard process. This will adversely impact low income immigrants. We should be making the fee waiver accessible to all low income applicants and not making it prohibitable.
976	USCIS-2010-0008-1061	Lettie Kirk	I strongly oppose the proposed change to the fee waiver eligibility process. Eliminating the benefit letter would impact members of our communities who are low-income, as many in these groups are not required to file taxes and would therefore not be able to prove their eligibility for the fee waiver. To change the verification process would be to punish those who are poor and vulnerable.
977	USCIS-2010-0008-1062	Mary Connors	I am opposed to the proposal to require tax returns for income verification, as many low income folks are not required to file returns. This change would prohibit these folks from proving their income and qualifying for a waiver.

ID	Comment.	Commentor	Comment
978	USCIS-2010-0008-1065	Sharon Farrell	I am opposed to the proposed change. Using tax returns as the sole means of income verification is wrong. People with the lowest incomes will be unable to prove their income status as they are not required to file federal income taxes, this will leave them with no way to prove their income and qualify for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.
999	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 1: Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 November 27, 2018 Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Form and Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121 Dear Chief Deshommes:</p> <p>The Immigrant Legal Resource Center (ILRC) submits the following comments in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to Form I-912, Request for Fee Waiver, and to the fee waiver eligibility criteria and required forms of evidence, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The ILRC is a national non-profit that provides legal trainings, educational materials, and advocacy to advance immigrant rights. The ILRC's mission is to work with and educate immigrants, community organizations, and the legal sector to continue to build a democratic society that values diversity and the rights of all people. Since its inception in 1979, the ILRC has provided technical assistance on hundreds of thousands of immigration law issues, trained thousands of advocates and pro bono attorneys annually on immigration law, distributed thousands of practitioner guides, provided expertise to immigrant-led advocacy efforts across the country, and supported hundreds of immigration legal non-profits in building their</p>

ID	Comment.	Commentor	Comment
1052	USCIS-2010-0008-1172	Orion Inskip	This change creates an impossible barrier for those that need the benefit the most. Those that havent filed a tax return would be automatically disqualified. All applicants should be evaluated on a cases by case basis and given the benefit of the doubt. Actual means testing provides appropriate process for this government benefit. This rule change will be challenged as a violation of process and will cost the government more to defend against, and ultimately lose than it could possibly save.
519	USCIS-2010-0008-0606	Fiona Bennitt	I strongly oppose the proposed change to the currently approved collection of documents for the fee waiver process. Eliminating the benefit letter would unfairly impact members of our communities who are low-income, students, and the elderly as many in these groups are not required to file taxes and would therefore be unable to prove their eligibility for the fee waiver. To change the verification process would be to punish those who are less fortunate simply for their lot in life. I object to this change.

ID	Comment.	Commentor	Comment
645	USCIS-2010-0008-0887	Thu-Van Nguyen	<p>I write to oppose changes to the fee waiver Form I-912 application process (USCIS 2010-0008, OMB Control #1615-0116) proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests as well as on applicants, and the organizations that assist them.</p> <p>These changes create clearly the division of the rich and the poor when come to demonstrate if the applicant can pay or cannot pay \$725.00 for N-400 Citizenship application fee, \$1225.00 for I-485 Green card application,\$1170 for N-600 Child Citizenship Certificate and \$540.00 for I-90 Green card renewal.</p> <p>On January 31, 1964, Food Stamp Act was enacted by President Johnson and the Congress to provide improved levels of nutrition among low-income households. Today unemployed, low income individuals, the disabled, the mentally ill residents and qualified immigrants are screened for the food stamp program eligibility that is based on income qualification.</p> <p>Denying the applicant to use means-tested benefit letters (Food Stamp, TANF, SSI, Apple Health) to qualify for fee waiver is a bad public policy and is an attack on the poor and low-income households. What else does the applicant have to demonstrate his or her poverty level when at the age of 65 years old is unable to find work and receiving food stamp is a mean to live and to survive? The 150% of HHS poverty guidelines determines clearly who can receive Food stamps.</p> <p>The proposed changes to the fee waiver eligibility process create unfair and unrealistic barriers for immigrants to apply for Citizenship. Many immigrants income is below the amount which requires filing an income tax return.</p> <p>I strongly urge you to maintain the current fee waiver application process and the guidelines set forth in Policy Memorandum PM-602-0011.1</p>

ID	Comment.	Commentor	Comment
723	USCIS-2010-0008-0859	Angelica Juarbe Santaliz	As a non-profit immigration lawyer working with low-income clients, I strongly oppose the proposed changes to fee waiver eligibility. The proposed changes would remove the receipt of a means-tested benefit as a criterion for receipt of a fee waiver. This criteria is the most common way for my clients to be able to prove their income - especially for those who most critically need the fee waivers. My clients often have multiple jobs, or short-term jobs, that make it difficult to show their income in other ways, including on tax returns. Demonstrating need using means-tested benefits is a clear-cut way to determine eligibility for fee waivers and it is crucially important that it remains a way for my clients to qualify for fee waivers.
99	USCIS-2010-0008-0245	Megan Kennedy	I live and work in a community with many neighbors who are applying for the fee waivers related to this change in policy, and I am concerned about this change to how to qualify for a fee waiver. The explanation for the policy change stated that because state benefits income guidelines vary, it is unfair to use eligibility for state benefits as qualification for a USCIS fee waiver. However, state benefits income guidelines vary because of the cost of living in different regions, and I know that it is far more expensive to live in my area (Seattle) than other parts of the country. Income that is adequate in another part of the country may not be adequate here. Additionally, this proposed change disadvantages people who have such low income that they do not file tax returns, including the elderly and disabled. It will be much harder for them to prove that they need a fee waiver, regardless of the fact that they have already proven to the state that they are in financial hardship. This proposed policy change claims to be based on fairness, but it is actually unfair to some of our community members. Please do not enact this change. Thank you.

ID	Comment.	Commentor	Comment
113	USCIS-2010-0008-0274	Victoria Hauptman-Bryan	<p>My name is Victoria Hauptman-Bryan. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS. Not everyone can afford a lawyer. Lawyers from the American Immigration Lawyers Association volunteer their time to help prepare applications for naturalization. Over the years, many of the clients have been eligible for fee waivers based on receipt of public benefits. I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people. I oppose the rule for these reasons:</p> <p>A) The test for the fee waiver is ability to pay. A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay. States and localities have already done a needs based test. USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed.</p> <p>B) The rule does not save the taxpayers any money. The rule creates more work for USCIS to scrutinize income and tax information due to the extra documentation required. This in turn will increase already long processing times to decide N-400s.</p> <p>C) This would be an expensive and time consuming burden, especially on the lowest income, elderly and they may end up not applying at all.</p> <p>D) People who receive public benefits and later file for naturalization and become US citizens are more likely to obtain higher earning jobs, complete education, have access to more resources, pay higher taxes, and contribute to their communities. We should not penalize permanent residents who have received public benefits that they are entitled to receive. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply.</p>

ID	Comment.	Commentor	Comment
175	USCIS-2010-0008-0319	Lori Melendy	<p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p> <hr/>

ID	Comment.	Commentor	Comment
332	USCIS-2010-0008-0450	Christina Guros	<p>I strongly oppose the proposed change to limit the parameters for processing fee waivers. As a former recipient of public benefits, I know personally both the limitations and benefits of the public assistance safety net, and believe this proposed change is wrong for immigrant families and our broader communities.</p> <p>I received public assistance in the form of Medicaid and SNAP assistance during the year following my college graduation. I was working full-time as an AmeriCorps member but still struggled to pay my New York City rent, utilities and food bills. Because I worked full time (and often on weekends), I had to visit the New York City Human Services Department on a Saturday, at the one location they were open on Saturdays. I got there 30 minutes before they opened to stand in line on a cold fall day. I was warned by multiple people that if I did not come at least 30 minutes before the door opened, I would be too late to get an appointment to be seen before the office closed that afternoon.</p> <p>I did not file taxes the previous year because I was a full-time student and my meager earnings from summer and work study employment did not add up to the minimum required to file federal income taxes. I had a job letter from AmeriCorps outlining my monthly stipend for the year, and proof of my residence. I waited in that office for hours and when I finally met with someone, was told that the evidence I had brought with me was insufficient. I was devastated, knowing that I would not be able to return to the benefits office for several weeks due to Saturday work commitments. Most families, like me, dread going to the public benefits office, because the application process is arduous and personal aspects of ones life are put under a microscope. The idea that local benefits-granting agencies are handing out benefits to unqualified or undeserving families is ridiculous and insulting to the experience of those who receive assistance. U.S. Citizenship and Immigration Services makes this assertion when they propose they will do the job of income-evaluation better than local public assistance offices.</p> <p>I eventually was approved for SNAP and Medicaid. Public assistance allowed me to go to the doctor twice when I got sick that year, and allowed me to prioritize food in my monthly budget, which would otherwise have been eaten up by rent, utilities, internet, laundry, etc. I stayed healthy that year because I was able to obtain public assistance. At the end of my 10-month AmeriCorps apprenticeship I landed a full-time job with good health benefits and got off assistance. With the help of my AmeriCorps financial aid award, I was able to pay off my entire student loan debt that following year. I am now able to support my family and save up for future emergencies.</p> <p>If I were in need of an immigration benefit during my year on assistance, I would have had no prior tax returns to submit as evidence but would have been able to provide proof of receiving public assistance. I would not have been able to provide the evidence required by this proposed change to the fee waiver process. Nor would I have been able to come up for my USCIS filing fee given my limited stipend and the high cost of living in New York. My future contributions to society both</p>

ID	Comment.	Commentor	Comment
421	USCIS-2010-0008-0540	Colleen Laing	<p>I am writing in opposition to the proposed revision to rules governing the fee waiver process for citizenship applications. Most low-income applications use a benefit letter to certify eligibility for a fee waiver. This letter is proof of low-income status in that income has already been confirmed by a government entity. There is no reason to disallow benefit letters, as they are reliable sources and are accessible to applicants.</p> <p>The proposed rule will disallow benefit letters as a means of confirming income and require that a tax return be used. Many very low-income people do not file tax returns. Typically only people with earned income file returns. Given that many people who apply for fee waivers are not tax filers, the proposed rule change creates a significant barrier to potential applicants. Asking communities to ensure that low-income members file tax returns is not feasible. It does not take into account lack of access to communicating with these community members due to cultural and language barriers, nor is funding for such outreach proposed.</p> <p>Tax returns are poor sources of current income information because they reflect income that is from a prior year. Very low-income people's incomes fluctuate a lot, and given the time sensitivity of citizenship applications, it is not feasible for someone whose income has dropped to wait for a subsequent year's tax return.</p> <p>On the whole, relying on tax returns is a bad plan that will shut-off immigration fee waivers to people who need them. I urge you to continue accepting benefits letters as a means of proving income-eligibility for a citizenship fee waiver. Thank you for your time and attention.</p>

ID	Comment.	Commentor	Comment
481	USCIS-2010-0008-0648	Tammy Green	<p>The proposed changes to the fee waiver eligibility process is unnecessary and would be a burden on taxpayers. The means-tested benefit letter is an effective way for low-income immigrants to prove that they are eligible for the fee waiver. The letters are awarded at the state level by government employees who are trained to verify income at the household level. If low-income immigrants are required to use their tax returns to demonstrate their eligibility, then their income status has to be verified a second time, at the federal level. This process of double-verification by government employees wastes valuable taxpayer dollars.</p> <p>Additionally, any proposed change to this process should respond to some deficiency or problem in the agency's ability to determine where applicants can pay fees. The current system is not broken there so there is no legitimate need to change it.</p>
562	USCIS-2010-0008-0715	Janice Peroski	<p>This proposed change in how immigrants would demonstrate their eligibility for the fee waiver is a horrible idea. I would hope that USCIS has better things to do than do the work of verifying income via tax returns when a) they know that many people are not required to file tax returns and b) there is such a thing as a means-tested benefit letter which already does this work for USCIS. There is NO reason for this policy change. There is no problem that this "remedy" would fix. It's terrible public policy and it's just a horrible idea. I could not be more strongly against this proposed change.</p>

ID	Comment.	Commentor	Comment
756	USCIS-2010-0008-1166	Jessica Nieves	<p>My name is Jessica Nieves. I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization.</p> <p>I have volunteered at citizenship clinics in Washington State. I help at these workshops because I understand how complicated and expensive the process is to become a citizen under today's regulations. My family is not Native American, which means we ourselves have also immigrated to the U.S. If it weren't for generous individuals and a legal system that welcome my family members -- I wouldn't be living here today.</p> <p>Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits. I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people.</p> <p>I oppose the rule it specifically target those that are low income. As the granddaughter of an immigrant, I understand first hand how once a person is able to become a citizens - the amount that they and the generations that follow them is tenfold. My grandmother received assistance when she moved to this country -- today, her children operate their own business and employee other individuals. And her grandchildren are attending college and are active members in their communities.</p> <p>If our taxes are already paying state or local benefits-granting agencies to thoroughly verify household income for those applying for benefits, why does USCIS want to redo this work? USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed, especially when N-400 processing times are at a historic high.</p> <p>Nonprofit organizations like OneAmerica would have to retrain staff and volunteers, change and retranslate their educational and outreach materials, incurring costs for translation, design, printing and distribution. The additional time needed to find the necessary proof of income will stretch their staff capacity, resources and infrastructure.</p> <p>I volunteer at the WNA clinics because they fill the gap in legal services for low-income clients. But we just meet with clients for the one day. Demand for services is</p>

ID	Comment.	Commentor	Comment
812	USCIS-2010-0008-0877	Amy Lee	<p>I oppose this proposal. This proposal is mean-spirited and is yet another backdoor attempt by this Administration to only allow wealthy and skilled immigrants in and to keep out immigrants whom it considers as less deserving. The effect of this rule change is that immigrants who receive means-tested benefits will face substantially more barriers to applying for immigration benefits for which they are eligible. Requiring applicants to provide proof other than a letter from the state or local agency administering the benefits is a huge obstacle. Most immigrants do have paystubs, rent receipts or other traditional proof of income and expenses. Most dont make enough money to file a federal tax return. Moreover, regardless of what state they may live in, immigrants who are on public assistance are struggling to make ends meet and cannot affording the escalating application fees.</p> <p>I am particularly concern about the impact this rule change will have on the ability of immigrants to naturalize. If immigrants are unable pay the required \$725 fee to apply for naturalization, they cannot become citizens. If they cannot become citizens, they cannot vote. The unintended (or intended) effect of this rule is that fewer indigent immigrants will be permitted to participate in our nations political process to decide who our leaders will be and what laws should govern our land.</p> <p>When I volunteered at a citizenship workshop in El Paso, TX in the past several years, I met many immigrants who relied on fee waivers based on receipt of means-tested benefits to apply for naturalization. Many were elderly and had lived in the U.S. for over 20 years. Without this type of fee waiver, they simply would not have been able to apply to become a citizen. Most of the people I helped did not make enough money to file a federal tax return and did not have the documentation required to apply for a fee waiver based on either 150% FPL or financial hardship. Under this proposal, these folks would be shut out of the American political process and would never realize their dream of becoming U.S. citizens.</p> <p>I urge you to NOT make this rule change and to keep allowing immigrants to apply for fee waivers based on receipt of means-tested benefits.</p>

ID	Comment.	Commentor	Comment
817	USCIS-2010-0008-0921	Meghan Kelly- Stallings	<p>Submitted via www.regulations.gov OMB Control Number 1615-0116 USCIS-2010-0008</p> <p>I write this comment in opposition of the proposed rule to revise the Form I-912 by eliminating the option of using an individual's receipt of a means-tested public benefit as a basis for fee waiver eligibility.</p> <p>I am a Seattle-based immigration attorney, formerly in private practice, who currently represents clients pro bono in applications for U Visas and asylum. I often use the Form I-912 to accompany Form I-765 Applications for Employment Authorization. In these submissions, I typically show my clients' eligibility based on their receipt of public benefits. For clients who receive public benefits, submitting a public benefits letter is by far the most straightforward way to demonstrate fee waiver eligibility. Many lowincome clients are not required to file taxes, and as such, filing an income-based fee waiver is likely to fail without the strongly preferred documentation of income. Without tax returns, and in many cases, pay stubs, it is almost impossible to show one's lack of income and eligibility under the poverty guidelines. The hardship basis of fee waiver eligibility is poorly defined, and in my 15 years in immigration law (as both a paralegal and attorney), I've never had a hardship-based request approved—a predictable outcome since no one really knows what type of evidence USCIS is seeking to demonstrate financial hardship.</p> <p>I'm not sure what this rule change is intended to achieve. It will create unnecessary obstacles for those who need assistance the most, and I do not see any upside for the federal government. The fee waiver is not available for most USCIS application types, and USCIS has decided it's in the public interest to allow fee waivers for certain application types, including the I-765 and N-400, Application for Naturalization. By making it harder for people to file I-765s and N-400s, and accordingly receive work permits and US citizenship, it effectively makes it harder for individuals to gain access to lawful employment or achieve the civic integration and economic boost associated with becoming a US citizen.</p> <p><i>Is this what USCIS wants to accomplish?</i></p>
818	USCIS-2010-0008-0820	Patrick Burns	<p>The Trump administrations proposal is just one more nail to shut the door to deny low paid immigrants their human right to remain in the United States. This proposal twists regulations so that these human beings have to unnecessarily produce tax returns that are not otherwise required of them. I most certainly oppose the Trump administrations revision and demand that the current methods verifying income apply.</p>

ID	Comment.	Commentor	Comment
918	USCIS-2010-0008-0935	Lois Horn	<p>As a retired social worker, I have worked together with a lot of low-income people in the past. Unfortunately, being low-income means that sometimes you're only one or two incidents that could put you into crisis. For people in these situations, it can be very difficult to collect and retain important documents. Therefore we should be mindful to be as flexible as the law allows in determining what documents are acceptable to prove one's income. To me, using proof of receiving a means-tested benefit is a common sense way of proving "inability to pay" as required by immigration law. Since a government agency has already made a determination on an applicant's low-income status, it would be redundant to force USCIS to make a separate determination. For low-income folks, it can be difficult to file a federal income tax return, especially since most low-income folks are not required to file a federal income tax return. I've even had low-income clients turned away by income tax preparers because they were told they didn't need to file. Such people would be unknowingly making themselves ineligible for the USCIS fee waiver. I strongly urge USCIS to keep the current fee waiver guidance in place so that low-income people who receive means-tested benefits will continue to be eligible for the fee waiver.</p>

ID	Comment.	Commentor	Comment
919	USCIS-2010-0008-0935	Lois Horn	<p>As a retired social worker, I have worked together with a lot of low-income people in the past. Unfortunately, being low-income means that sometimes you're only one or two incidents that could put you into crisis. For people in these situations, it can be very difficult to collect and retain important documents. Therefore we should be mindful to be as flexible as the law allows in determining what documents are acceptable to prove one's income. To me, using proof of receiving a means-tested benefit is a common sense way of proving "inability to pay" as required by immigration law. Since a government agency has already made a determination on an applicant's low-income status, it would be redundant to force USCIS to make a separate determination. For low-income folks, it can be difficult to file a federal income tax return, especially since most low-income folks are not required to file a federal income tax return. I've even had low-income clients turned away by income tax preparers because they were told they didn't need to file. Such people would be unknowingly making themselves ineligible for the USCIS fee waiver. I strongly urge USCIS to keep the current fee waiver guidance in place so that low-income people who receive means-tested benefits will continue to be eligible for the fee waiver.</p>
920	USCIS-2010-0008-0936	Raisa Kuznuk	<p>I oppose the rule change proposal by the Department of Homeland Security to reduce the eligibility options for the fee waiver because it will make huge impact on people who are qualified for free help, but because of limited English can not get all proofs.</p> <p>Letter of food stamps are good proof of low income and people already provided all evidences to be qualify for it. Why do you want to make life harder for them? Some people don't have to file taxes, because they don't work. Now you force them to file it, because otherwise they will not have enough proofs.</p>

ID	Comment.	Commentor	Comment
925	USCIS-2010-0008-0952	Sam Hockley- Smith	<p>I am writing to recommend against the proposed revision in USCIS fee waiver policy. The policy would prevent low-income people who do not file federal income tax returns from qualifying for the fee waiver. Currently such people can show they qualify by demonstrating proof of receiving a means-tested benefit. It is best to continue this policy. If an applicant has already proven their low-income status to a state or federal agency like the Social Security Administration, it would be inefficient to force them to file an income tax return just to prove their low-income status to a different federal agency, US Citizenship and Immigration Services. While most Americans are required to file federal income tax returns, many low-income Americans are not required to do so and thus do not have income tax returns available. USCIS should aim to have a policy that does not exclude this population from qualifying for the fee waiver without adding the burden of filing an income tax return. Filing an income tax return, especially when not required to, is a process that is full of barriers: linguistic, monetary, and cultural in nature.</p> <p>By requiring an income tax return specifically from those people that are not required to file them, it seems like USCIS is purposefully trying to exclude them from the fee waiver process. I'm afraid that this seems to go against the current law regarding the fee waiver which lists an applicant's "inability to pay" as the only standard in qualifying for a fee waiver. Whether or not an applicant has filed an income tax return is not mentioned in the statute and is immaterial to the fee waiver process. It seems possible that discriminating in this way against people who do not file income tax goes against the meaning of the fee waiver statute and would open up USCIS to increased litigation surrounding the issue.</p> <p>My recommendation is to continue with the status quo policy. If USCIS feels it is necessary to alter their fee waiver policy, there must be language in the fee waiver revision to cater to people who are not required to file federal income tax returns.</p>
938	USCIS-2010-0008-1008	Christopher Brown	<p>Please do not It make it harder for folks to have fee waivers for their application fees. Demonstrating an ability to pay should be simple and not be based on a federal tax transcript. An additional burden should not be placed on communities who are seeking assistance and support to gain US Citizenship, Green Cards, work permits, or other associated applications.</p>

ID	Comment.	Commentor	Comment
949	USCIS-2010-0008-1025	Jessica Jenkins on behalf of Center for Employment Training Immigration and Citizenship	<p>November 27, 2018</p> <p>Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Center for Employment Training Immigration and Citizenship program (CETICP) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. We oppose the proposed change because it will restrict lawful permanent residents access to United States citizenship, and because it will impose an increased burden on legal service providers. Center for Employment Training's mission is to promote human development and education by providing people with marketable skills training and supportive services that contribute to selfsufficiency. Since 1987, CET-ICP has been committed to promoting immigration integration by providing legal assistance to aspiring citizens as well as citizenship preparedness classes. We believe that the successful integration of immigrants into American society is essential to our nation's growth and success. Our work helping lawful permanent residents to apply for naturalization is key to that integration.</p> <p>CET-ICP is one of the largest immigration legal service providers in Santa Clara County, California.</p> <p>Located in the heart of the Silicon Valley, the community we serve has one of the highest costs of living</p>

ID	Comment.	Commentor	Comment
952	USCIS-2010-0008-1028	Eric Holzapfel	<p>I am the immigration manager of a non-profit that provides immigration services to low-income clients in King County, Washington. I am submitting a comment on the proposed changes to fee waivers, because they are unjustified, a burden to my organization and our clients, prevent qualified LPRs from naturalizing, and, finally, I believe they violate USCIS' duty to represent the importance of naturalization.</p> <p>USCIS' stated reasoning for these changes does not align with our agency's experience with erroneous approvals and problems in adjudication, nor do we agree that any financial justification exists. Finally, our state has made no alterations to awarding mean-tested benefits that would justify USCIS reliance on this factor.</p> <p>The proposed changes to fee waiver will not only create more burden and documentation to USCIS and other federal/state agencies, but it will also create more burden for my organization and our clients. Our citizenship program is done primarily through a clinic model, and the majority of clinic clients qualify for fee waivers. Means-tested benefits is an accurate and efficient way of seeing if a client would qualify for a fee waiver. Assembling complete evidence of income or financial hardship, however, would be less likely and burdensome. With less of our clients having the documentation necessary to qualify for fee waiver, at our naturalization clinics, we will have lower rates of naturalization.</p> <p>Again, the justifications and the impact of the changes to fee waivers are in direct contrast to the duty of USCIS. I strongly urge you to maintain the current fee waiver form and accompanying guidelines, in order to adhere to your duty of respecting the importance of naturalization.</p>

ID	Comment.	Commentor	Comment
953	USCIS-2010-0008-1029	Kimberly Colwell	<p>I oppose the proposed change to the methods for determining eligibility on the I-912 Fee Waiver request.</p> <p>The proposal would remove the means-tested benefit option in the fee waver request, thereby taking away the most straightforward and simplest option that most applicants have available to them. This makes no sense.</p> <p>The rationale for this proposed change is to reduce the evidence required for Form I-912 to only a persons household income and no longer require proof of whether or not an individual receives a means-tested benefit.</p> <p>This reasoning makes it sound as though USCIS's goal is to make this form easier and simpler for applicants. Taking that goal at face value, USCIS itself ought to oppose this proposed change. Here's why:</p> <p>* In order to qualify for the fee waiver there are currently three optionsreceipt of public benefits; income below 150% the federal poverty guideline; demonstration of hardshipand an applicant needs only choose one of these and submit evidence that proves he or she qualifies under that category. I argue that having a choice is, in fact, simpler for an applicant.</p> <p>* If tax returns alone are required for income verification, people with the lowest incomes will be unable to provide evidence of their income since they are not required to file federal income taxes, leaving them with no reasonable options to show their current income in order to qualify for the fee waiver.</p> <p>* If someone has been approved for a public benefit, they have already been screened for income eligibility by the benefit agency. Once approved for the benefit, they are periodically reassessed for continued eligibility. Award letters often show the household income assessment the agency completed.</p> <p>I also think there are solid moral, economic, and American-value reasons to oppose this proposed change.</p> <p>* Morally, this proposal makes it more difficult for the very people that the I-912 Fee Waiver is designed to help. I find that indefensible. It is cruel.</p> <p>* Economically, studies show that immigrants have a net positive effect on the economy. And just because someone needs help now doesn't mean that they won't be</p>

ID	Comment.	Commentor	Comment
972	USCIS-2010-0008-1054	Michelle Haubner	<p>I am opposed to the change in the fee waiver which eliminates the ability to apply for a fee waiver based off of means-tested benefits. Many individuals who are applying for immigration statuses do not receive a means-tested benefit due to the restrictions on which groups of immigrants are even eligible to apply for them. Many of them have U.S. citizen children who are receiving benefits, but the applicant or head of the household is not personally receiving anything. Therefore, I do not think that eliminating this ground of the fee waiver is even going to help as much as expected to lower costs.</p> <p>Additionally, those individuals who are in the worst financial situations, may have no proof of income at all, but receiving a means tested benefit. Since the restrictions are placed on proof of income at or below 150% of the federal poverty guidelines, it is almost impossible for someone to prove their income is \$0 without producing means-tested benefits as proof.</p> <p>Through my work as an accredited representative, I have known many hardworking people who cannot afford the steep prices for a single immigration application. Even if they were to save over long periods of time, it would be unlikely for them to have the money without sacrificing the need to provide necessities for themselves or their families. To me in a place like the United States, where we are known for being a place of opportunity, I think it is unfortunate to think that some the hardest working individuals may not be able to apply for citizenship or adjustments of status simply because they are too poor to prove their wealth.</p>

ID	Comment.	Commentor	Comment
979	USCIS-2010-0008-1066	Vichal Kumar, NDS Harlem	<p>Comment part 1: November 27, 2018</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>Neighborhood Defender Service of Harlem respectfully submits the following comments in opposition related to the proposed revisions to form 1-912, Request for Fee Waiver.</p> <p>The Neighborhood Defender Service of Harlem (NDS) has been providing legal services to low income Northern Manhattan and greater New York City community for almost 30 years. NDS aims to help members of the community in search of affordable and quality representation that they would otherwise be unable to access. In my role as Managing Attorney of the Civil Defense Practice, I oversee the provision of immigration legal services to over 1000 clients each year. The vast majority of our clients are of limited means or currently receive public benefits. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create additional undue hardships on immigrant communities and vulnerable individuals and will cause a significant unnecessary administrative burden on communities and federal agencies. We believe these three reasons necessitate the rejection of the proposed changes.</p> <p>1. Requiring additional documentation to demonstrate verified fee waiver eligibility acts as a deterrent to applying for immigration benefits or naturalization.</p> <p>The proposed amended Form 1-912 will act as a barrier to the immigrant community in seeking</p>

ID	Comment.	Commentor	Comment
1039	USCIS-2010-0008-1155	Michael Itti, Chinese Information and Service Center	<p>November 26, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>Chinese Information and Service Center (CISC) opposes changes to the fee waiver application process proposed by the United States Citizenship and Immigration Services (USCIS) published in the Federal Register at 83 Fed. Reg. 49120 on Sept. 28, 2018.</p> <p>Currently, a person can prove their eligibility for the fee-waiver in three ways via income tax returns, a letter from a state agency stating that they are receiving a means-tested public benefit, or proof of financial hardship. The vast majority of low-income applicants use a benefit letter to prove their eligibility. The benefit letter is easy to obtain and is proof of their low-income status. If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes. CISC is opposed to this change since it would create a barrier for low-income applicants to receive the fee-waiver.</p> <p>CISC's mission is to support immigrants and their families by creating opportunities for them to succeed, while honoring their heritage. CISC provides naturalization services to our clients and assists them in completing 50-60 waivers annually. Many of the applicants do not file a tax return because their incomes are so low they are not required to file. If all individuals are required to submit tax returns for fee waivers, most of the low-income applicants will not be able to apply for a fee waiver, which would impact 50 to 60 percent of the eligible applicants we serve. Without the fee waiver, they will not be able to naturalize.</p> <p>The proposed changes would have a tremendous impact on our clients and their ability to achieve their</p>

ID	Comment.	Commentor	Comment
1047	USCIS-2010-0008-1167	Melody Young	I oppose the proposed change to the processing of Form I-912 for fee waivers (USCIS 2010-0008, OMB Control #1615-0116). The proposed change, by requiring tax returns to verify incomes, would create new barriers for low-income immigrants (e.g., elderly or student immigrants) who are not required to file tax returns. The current review process allows applicants to submit means-tested benefit letters issued by state governments; such letters are a reliable method of verifying the need for a fee waiver, and the issuance of these letters creates no extra burden for the state governments which are involved. Requiring tax returns to be filed by applicants who are not required to file them, creates an unnecessary and burdensome step for immigrant applicants, and also creates more paperwork for the federal government which must process tax returns that are not required by the federal tax code. The proposal does not serve either the applicant or the reviewing agencies, and it should not be enacted.
1058	USCIS-2010-0008-1178	Bailey Craft	I strongly oppose the rule change limiting fee waivers to those with income tax returns under 150% of the poverty line. This proposal places an undue burden on individuals who have already gone through an extensive eligibility test by government agencies. This duplication will hinder many qualified individuals solely on the basis of income. Applicants who receive means-tested benefits should continue to qualify for fee waiver
1062	USCIS-2010-0008-1182	Ashley Podplesky	USCIS should continue to allow means tested benefits when applying for a fee waiver. When working as an AmeriCorps member I helped many individuals apply for a fee waiver, and means tested benefits were often the only way our clients qualified. Many applicants, especially the elderly and those who are unable to work do not make enough money to qualify to file taxes. Means-tested benefits may be the only way they can qualify for a fee waiver. USCIS is taking over a year to process these applications, and adding unnecessary paperwork would only extend this processing time.

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1066	USCIS-2010-0008-1186	Leah Martin, Hand in Hand	<p>Comment part 1: November 26 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>We're writing to strongly oppose the USCIS proposal to stop accepting receipt of a means-tested benefit as evidence that a person qualifies for an application fee waiver. At Hand in Hand Immigration Services we work in Chelan, Douglas and Okanogan Counties of Washington State, assisting community members in applying for U.S. Citizenship. We have been in operation as a BIA, then DOJ accredited site for 3 years. Last year Hand in Hand signed G-28s for 200 N400 applications and 60% of our clients filed a fee waiver and 20% were eligible for a disability waiver. The proposed revision would have a large negative impact on the clients we serve and our larger community. Many of our clients work in seasonal agricultural positions and their income is different from the one on their taxes. We also have many elderly and disabled clients who would be negatively impacted by the proposal because the majority use means-tested benefits based off of Medicaid. Lastly, the proposed revision will reduce the number of clients we serve in half, based on the documentations we will need to collect and the staff training we will need to do to make this change. This proposed revision is not to the benefit of our community. This proposal isn't financially justified. Fee waivers never cost American taxpayers anything. USCIS is a fee-based agency, meaning that they don't use any discretionary exceptions for application processing based on immigration and financial hardship</p>
1084	USCIS-2010-0008-1204	Taira Anderson	<p>I am opposed to this proposal because it takes away an individual's ability to utilize proof of receipt of means-tested public benefits to show inability to pay the assigned fee despite the fact that receipt of a means-tested benefit is acceptable evidence of lack of ability to pay. This proposal would create a heavy burden for our community members. It also does not take into consideration those who need help getting a transcript since many do not have access to a computer, etc.</p> <p>Thank you for taking time to review my comment.</p>

ID	Comment.	Commentor	Comment
1088	USCIS-2010-0008-1207	Alycia Moss, Moss Immigration Law PC	<p>I oppose removing means-tested benefit from the fee waiver options. Individual's financial situations are not as simple as what the adjusted gross income is on a tax return, which is what most adjudicators understand to be a person's income for the fee waiver. The means-tested benefits give another way to assess a person's financial situation. In addition, many low-income people are not required to file taxes.</p> <p>Please do not change the fee-waiver.</p>
1090	USCIS-2010-0008-1210	Joseph Lachman	<p>As a descendant of immigrants who struggled in the face of racism and xenophobia and were imprisoned by their own government because of their Japanese ethnicity during WWII, I am writing to express my absolute opposition to this proposed change.</p> <p>In 2017 over 285,000 fee waivers were granted to people who absolutely deserved them, and many of those were made possible because of their means tested benefits documentation. There is no reason that this should be changed, as a person who is using public benefits clearly should qualify for a fee waiver. This change will only cause unnecessary red tape barriers towards citizenship and unfairly extract millions of dollars out of the communities with the least ability to pay. People who qualify for fee waivers will generally not even be filing an income tax return precisely because their income is so low, and so this rule change would create an immoral catch-22 that punishes people for being poor.</p> <p>I demand that this proposed change be withdrawn because of how it will damage communities across our nation. Communities are healthy when the government is not creating excuses to take what little money they have to take care of themselves and their families.</p>

ID	Comment.	Commentor	Comment
1091	USCIS-2010-0008-1211	Julie Conklin	I strongly oppose the proposed change to the fee waiver. Currently, immigrants may qualify if they receive a means-tested benefit. The process of qualifying for such a benefit already involves significant documentation of their low income status. Many of these people are sufficiently low income that they are not required to submit a federal tax return. Requiring them to also submit a federal tax return or tax transcript involves an unnecessary and burdensome additional step that adds nothing further to guarantee that fee waivers are being granted only to low income applicants. I urge you not to implement this rule change.
1151	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 4: B. Restricting Acceptable Proof of Income Is Arbitrary and Capricious</p> <p>It is reasonable for USCIS to allow individuals who seek to prove their income to do so by the means available to them. There is no justification for eliminating avenues for individuals who meet the regulatory standard to prove their inability to pay the prescribed fee. Indeed, USCIS should accept more, not fewer, forms of evidence. For instance, a federal, state, or county agency that has evaluated an applicant's income while performing an eligibility determination for a means-tested benefit is undoubtedly qualified to provide a written attestation of that individual's household income. There is no reason USCIS should not accept as proof of income an income determination from a federal, state, or county government agency. Broadening, not restricting, the ways in which individuals can prove their income would allow USCIS to adjudicate fee waivers most effectively and efficiently. organizations perform income verifications is burdensome to institutions and harmful to the individuals they serve. For individuals who have no income or cannot provide proof of income, religious institutions, non-profits, and community-based organizations should continue to verify that the individual is receiving a benefit or support from that organization and to attest to the applicant's financial situation, and USCIS should continue to accept this verification as proof of the individual's inability to pay the immigration or naturalization fee. The proposal would unreasonably impose a further requirement on religious and community-based organizations to attest that the individual has no income, not just that they receive services or benefits from that organization. This proposed change greatly expands the requirement on religious institutions, non-profits, and community-based organizations to review and verify the financial situation of people they assist, a task they are not trained to perform and a standard they are likely unable to meet. As a result, the proposed changes will have the practical effect of almost completely eliminating an entire category of acceptable income evidence.</p> <p>USCIS's proposal to restrict acceptable proof of income has no reasonable justification and should be rescinded.</p>

ID	Comment.	Commentor	Comment
454	USCIS-2010-0008-0561	Marisol Tapia	<p>I oppose the propose changes to the public charge rules because it creates a burden on low-income families due to the fact that they will no longer be allowed to provide a means-tested benefits letter to show that they are low-income and ultimately demonstrate that they qualify for a fee waiver. Many poor families don't make enough money to file their tax return, as they are not required, which will mean that they will have a very hard time proving their low-income status.</p> <p>Please don't make it harder on poor families.</p>
850	USCIS-2010-0008-0839	Naomi Gutierrez	<p>I write in opposition to this proposed rule change. While the current system may be imperfect, requiring applicants to provide tax documentation to prove their eligibility for fee waivers seems extremely likely to only increase the time needed for applicants, their assistants, and the USCIS staff. USCIS staff will be duplicating work already performed by other government agencies who determined whether applicants were eligible for means-tested benefits. I strongly oppose this rule change. Thank you.</p>
878	USCIS-2010-0008-0774	Frannie Moulton	<p>I strongly oppose this new policy as it is a waste of government resources as USCIS will have to verify income via tax returns. The current method of verifying income via means-tested benefit letter is sufficient. The new policy will hurt many people who are not required to file tax returns.</p>
970	USCIS-2010-0008-1051	Neal Kendy	<p>This proposed change in how immigrants would demonstrate their eligibility for fee waiver is a terrible idea. This is a waste of resources for USCIS to have to verify income via tax returns knowing that many people are not required to file tax returns. Means-tested benefit letter works for income verification. It does not make any sense for this policy change as it punishes the most vulnerable and prevent them from applying for citizenship. I am strongly opposed to this proposed change.</p>

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793	USCIS-2010-0008-1068	Peter McGraw, Texas RioGrande Legal Aid	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>Texas RioGrande Legal Aid (TRLA) represents low-income immigrant survivors of domestic violence, victims of human trafficking, and other individuals eligible for humanitarian forms of relief such as U visas, T visas, VAWA Self-Petitions, Battered Spouse Waivers, and Special Immigrant Juvenile Status. We submit these comments in response to U.S. Citizenship and Immigration Services' (USCIS) solicitation of comments regarding the agency's proposed changes to fee waiver eligibility. TRLA strongly opposes USCIS's proposed changes because they will pose significant time and resource burdens to survivors, trafficking victims, and other vulnerable applicants and will ultimately deter such applicants from applying for fee waivers and immigration benefits.</p> <p>USCIS proposes to rescind its current policy memorandum regarding fee waivers and to "issue new guidance on the documentation acceptable for individuals to present to demonstrate that they are unable to pay a fee when requesting a fee waiver."1 The agency's description of the reasons justifying departure from the current fee waiver policy focuses almost exclusively on proposed changes to means-tested benefit eligibility criteria. However, in supporting documents posted to the Federal Register days after the initial announcement of USCIS's proposal, the agency makes clear its intent to adopt a far more restrictive fee waiver eligibility policy. The proposed changes would mandate the use of Form I-912 and require submission of particular documentary evidence of inability to afford relevant fees. These requirements will serve as a deterrent to applying for immigration benefits. The proposed changes make the fee waiver application process more complex and time consuming. For example, USCIS's proposed changes would require applicants to submit a request to the IRS for a tax transcript, which itself can take anywhere from 5 days to 6 weeks to produce, depending on how recently an applicant filed their tax return.2 Applicants, particularly those who face a deadline, may be deterred by this additional requirement even if they have other adequate documentary proof of their inability to pay. The proposed changes will ultimately discourage vulnerable victims of abuse from seeking</p>

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959	USCIS-2010-0008-1036	Christina Elhaddad	<p>I, like many in the United States of America, am a child of immigrants. This country has served as the safe haven for many fleeing violence, injustice, and poverty. Living the American dream wasn't always easy and often we struggle before we make it. This is what this country is about. This is the type of opportunity this country provides those who yearn for it. Our resources are abundant and our people are great. We are a special nation because we realized far earlier than others that to be great, we need to invest in our people who in turn work harder to invest back in our greatness. If we make it financially harder for such people to seek the right way to live and prosper in this country, then we are opposing everything we stand for. The value of people should always be stronger than the value of money.</p> <p>I have worked as a non-profit immigration attorney for the last 3.5 years, and I have met far more people hungry to contribute positively to their society than people looking to benefit from the government. For the last 13 months, I provided legal services for survivors of domestic violence, and I am envious of the strength and resilience survivors exude. However, survivors realize that they face financial limitations, and more often than not, it is not their fault. I cannot fathom the same government able to draft and pass laws such as VAWA be able to hinder the immigration process for folks such as my clients for money.</p> <p>Recently, a homeless client of mine who receives Medicaid and lives in a homeless shelter applied for VAWA self-petition and adjustment of status. We requested a fee waiver based on his receipt of Medicaid (a means tested benefit) and included a letter from the Medicaid agency that shows his income is \$0. The fee waiver was rejected, forcing us to file another fee waiver, lose time, and unnecessarily waste resources that could have helped other clients. This happened to several of our clients who all live under the poverty guideline and who all provided enough evidence to show that they merit a grant of a fee waiver. Yet, we are being forced to spend unnecessary time and resources to refile fee waivers more than once when the fee waivers should have been approved the first time. A delay of two weeks in adjudicating immigration applications could mean a delay of months or even years in the immigration world. It is already very difficult for survivors of domestic violence to survive daily life, yet they end up facing another rejection, uncertainty, and obstacles along the way. Most of my clients are women and many of them have minor children. They are usually the sole breadwinners and caretakers of their children. Being a single parent in the United States, let alone New York City, is difficult and expensive. Depending on the generosity of the federal government to waive a fee of hundreds of dollars means an opportunity for an applicant mother to feed her children or to purchase other necessities for them. Many of our clients don't have the ability to prove that they are living under the poverty guideline because they are either not obligated to file income taxes or are living in difficult situations where they do not have access to certain documents. Sometimes all an applicant can provide is their word, and in my opinion, that should be enough.</p>

ID	Comment.	Commentor	Comment
994	USCIS-2010-0008-1087	Sara Lowry	<p>strongly oppose the proposed rule change eliminating the Means Tested Benefit option on Form I-912 for the following reasons:</p> <p>1.Income is Relative</p> <p>The cost of living varies greatly between states and cities. An income of \$20,000 per year goes much further in Flint, Michigan than it does in New York City. States have developed their own system to measure a persons income based on that areas cost of living. Eliminating the Means Tested Benefit would leave no room to account for the extreme differences in cost of living around the country. Low income families would ultimately be targeted because their income would not necessarily place them below the federal poverty line, but according to their own state they would struggle with the average cost of living. The majority of states have already placed their maximum qualifying means for public assistance at less than the FPL so the removal of eligibility through proof of a Means Tested Benefit only adds to paperwork for USCIS.</p> <p>2.Unavailable Tax Returns</p> <p>People who make less than the threshold requirement to file taxes still receive means tested benefits. If an individual or family is not meeting the threshold of income to file taxes, but they are found eligible to receive a Means Tested Benefit, there is a need for a fee a waiver. Additionally, paperwork to show such a low income without a tax return is extremely time consuming and difficult.</p> <p>3.Situations of Domestic Violence</p> <p>A person living in a violent household may not have access to tax returns or have access to any of the income listed on the taxes. The tax return does not show the full picture of each persons circumstance. Furthermore, if a domestic abuse survivor successfully flees the abuser, they often do not have time to collect past tax records or other documentary evidence; they often need to escape very quickly. Only providing avenues through income based on past tax returns or other documentary evidence for the financial hardship option will put domestic violence survivors at a severe disadvantage. Filing under a Means Tested Benefit allows the survivor to receive the necessary assistance in a more timely manner and further assist them in fleeing their violent situation.</p> <p>4.Time and Resources</p>
478	USCIS-2010-0008-0619	Tristinn Williams	<p>I oppose this fee change. All immigrants should have the opportunity to apply for citizenship, not just the ones who earn enough money to fill out a tax return.</p>

ID	Comment.	Commentor	Comment
150	USCIS-2010-0008-0306	Thomas Bonner	<p>I write to you today to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people. I oppose the rule for these reasons:</p> <p>A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay. States and localities have already done a needs based test. USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed. This is an example of systemically oppressive system designed to not allow people to become immigrants.</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>While some might be able to afford \$725.00, that is a huge burden for most normal American families--my own included. It is my sincere hope that your office can recommend policies which are more representative of reality in our country.</p>

ID	Comment.	Commentor	Comment
164	USCIS-2010-0008-0291	Christina Guros	<p>I strongly oppose the proposed fee waiver rule change because it is an irresponsible use of public funds.</p> <p>The proposed rule change would eliminate the use of public benefits as evidence that a person is low-income and therefore unable to pay the filing fees associated with certain immigration applications. Income-based fee waivers currently require more evidence than fee waiver requests that are based on public benefits. This translates into more officer time spent reviewing them. The proposed rule change has the purported purpose of saving officer time, but this is completely false.</p> <p>Currently an income-based fee waiver application requires an income tax return from the prior tax year, plus pay stubs from the last three months and sometimes additional evidence, especially if there has been a change in a persons income since the previous tax year. This is at least two types of evidence including potentially dozens of documents. Public benefits-based fee waivers usually require only a letter from the benefit-granting agency that shows the person is currently receiving the benefit and that the determination to grant the benefit was based on need. This is only one piece of evidence. Reviewing and comparing multiple pieces of evidence that paint a picture of a persons financial circumstances necessarily takes more time than reviewing one piece of evidence that proves a persons low-income status. USCIS have no justification for spending more time not reviewing immigration applications.</p> <p>More officer time will also be wasted in re-reviewing fee waiver requests that are resubmitted multiple times. Evidence to prove lack of income for those who do not file income taxes is virtually impossible for many applicants to obtain. For a person whose only income is public assistance, what is proper evidence to show lack of income? Currently USCIS does not know how to respond to that question, and their proposed changes to the fee waiver get us further from an answer. A person whose only income comes from public benefits will be left in limbo, tracking down more evidence that USCIS will likely reject as proof of lack of income. For instance, presently, when a person files their federal income taxes with no earned income for the filing year and submits their tax returns to immigration with an annual income of \$0, USCIS regularly rejects their fee waiver request.</p> <p>This person will not be able to save up for the filing fee, so will instead look for more evidence of her zero-income status and resubmit to USCIS. This means the USCIS officer reviews the same fee waiver request two, three or more times. The officer could have instead verified the states determination of this persons low-income status quickly and only spent the time to review the fee waiver request once.</p> <p>Additionally, each time the fee waiver is rejected, USCIS mails the entire application packet back to the applicant. The cost of postage for these 20+ page packets goes to DHS and is another waste of public dollars.</p>

ID	Comment.	Commentor	Comment
262	USCIS-2010-0008-0379	Jennifer Hrachovec	I strongly oppose the fee waiver rule because I am blessed to work with several immigrants - two are teaching college classes that I am taking, and another is a transplant surgeon. These colleagues provide tremendous benefit to our community. The proposed revision is restrictive and punitive for applicants and increases costs to DOJ-recognized agencies. Income-based fee waivers require a lot of time and expertise to prepare by the immigrant, including 3 months of pay stubs and tax returns from the most recent year or a combination of income prof from every working member of the household. The government would need to process these applications, adding to the backlog of work, which is 753,352 in the US and 18,707 in Seattle. I don't want my taxes funding additional bureaucracy to process paperwork that duplicates the work of other state or local benefits-granting agencies. I strongly urge the Trump Administration to immediately withdraw this provision to revise the I-912 form.

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1175	USCIS-2010-0008-0886	Michelle Carey, The Los Angeles Center for Law and Justice	<p>Comment part 4: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form 1-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or nonemployment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means tested benefit).</p>

ID	Comment.	Commentor	Comment
1184	USCIS-2010-0008-0763	Patti Seger on behalf of End Domestic Abuse Wisconsin, the Wisconsin Coalition Against Domestic Violence (End Abuse)	<p>Comment part 4: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies. USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>The types of immigration relief specially designed for survivors of domestic abuse and other crimes include U and T Nonimmigrant Status and Violence Against Women Act self-petitions. Over the past several years, processing times for each of these forms of relief has steadily crept up. As of right now, case processing times for the Vermont Service Center are as follows:</p> <ul style="list-style-type: none"> • I-918, Petition for U Nonimmigrant Status: 49-49.5 months (over four years); • I-914, Application for T Nonimmigrant Status: 14.5-22.5 months; • I-360, VAWA self-petition: 16-20.5 months. <p>Survivors applying for these forms of relief are already waiting over a year, in many cases several years, to gain status. Making the I-912 required, for each family member, and more difficult to process will make these processing times longer still. Timely access to lawful immigration status is imperative for survivors to gain access safety.</p>
677	USCIS-2010-0008-0789	Jean Bruggeman, Freedom Network. USA	Comment part 1:

ID	Comment.	Commentor	Comment
944	USCIS-2010-0008-1015	Rose Thompson	I am an immigration attorney and represent many VAWA and U visa petitioners. I am wholeheartedly opposed to the newly proposed fee waiver process. Many immigrants with low income do not file tax returns, and they are not required to due to little or no income (especially for victims of domestic violence who often have no income). Therefore, if tax returns become the only basis for applying for the fee waiver, they will become ineligible through no fault of their own, and this would be extremely unfair to them, as they clearly would find it a huge hardship to come up with the large fee required to apply for any benefits. Please do not adopt this ridiculous policy that will hurt many many domestic violence and other victims.

ID	Comment.	Commentor	Comment
1015	USCIS-2010-0008-1119	Joanne Lewis, Connecticut Legal Services, Inc.	<p>RE USCIS 2010-0008 Public Comment Opposing Changes to Fee Waiver Criteria FR Doc. 2018-21101 Filed 9-27-2018. 83 FR 49120-49121</p> <p>I write to oppose the proposed regulations regarding waiver of fees in immigration matters. To begin with, by regulation only a small number of applications and petitions are eligible for fee waivers. The regulations designate these applications because eligible individuals are frequently too poor to pay the fees, which are quite expensive. Many of the applications and petitions for which waiver of fees is allowed by the regulations are for crucial relief which is necessary to the individual's health, safety and ability to remain in the United States legally.</p> <p>I work for Connecticut Legal Services. We are a non-profit law firm for people of limited means. A small portion of our clients are seeking immigration status. Our general eligibility level is 125% of the poverty level. Our clients cannot pay these fees without substantial hardship to themselves and their families.</p> <p>Many of our clients are seeking humanitarian benefits such as U or T visas. Although there is no fee for the basic applications, many applications will require I-192s, which are prohibitively expensive. They will also require work authorizations to work legally, pay taxes and contribute to society, as well as to support their families. Self-petitioners who are married to citizens or permanent residents can apply for adjustment of status. Most cannot afford fees of more than \$1000.</p> <p>Some of their citizen children or family members receive means tested government benefits due to the family income. That income is definitely low enough to qualify for a fee waiver. The proposal states eligibility for means tested benefits is not probative because eligibility can vary, the fact is that people who are eligible do not suddenly make enough to pay a thousand dollars or more out of their budgets even if their situation improves. They do not have savings that could be used to pay these expensive fees. This concern could also be alleviated by requiring proof of current receipt of benefits. If benefits are being received by family members at the time the application is filed, the person has insufficient resources at that time.</p> <p>Clients without work authorization have limited options for proving their income. Employers who know they shouldn't be hiring undocumented workers are hesitant to provide letters stating that they do. People doing odd jobs to make ends meet and support their family have no proof of their incomes.</p> <p>These fee waiver regulations will deny people the ability to legalize their status and to obtain work authorization. I strongly oppose their imposition.</p>

ID	Comment.	Commentor	Comment
1160	USCIS-2010-0008-1096	Christina Gill on behalf of Greater Hartford Legal Aid, Inc.	<p>Comment part 3: B. The proposed revisions will cause hardship for immigrant survivors of violence and service providers that support them. Fee waivers for ancillary forms like work permits and waivers are important to ensure that all survivors have access to immigration protections for which they may be eligible.⁹ We at Greater Hartford Legal Aid are already seeing that immigrant survivors are feeling discouraged from accessing protections that they need to be safe and economically independent.¹⁰ Contrary to what Congress intended,¹¹ the proposed revisions will exacerbate the barriers that immigrant survivors already face when coming forward to access protection. The proposed revisions ignore the reality of the intersections of financial instability and intimate partner violence, they increase barriers for survivors and service providers, and unnecessarily eliminate means tested-benefits as criteria for fee waivers.</p> <p>1. Flexible Fee Waiver Policies and Practices are Critical for Survivors of Violence.</p> <p>In our experience, intimate partner violence, especially for immigrants, comports with studies cited by the Department of Justice¹² and developed by the Centers for Disease Control and Prevention (CDC),¹³ that indicate the strong relationship between intimate partner violence and economic, food, and housing insecurity. Abusers commonly prevent survivors from accessing or acquiring financial resources in order to maintain power and control in the relationship. In one study, 99% of domestic violence victims reported experiencing economic abuse.¹⁴</p> <p>In our experience, survivors are often unable to obtain documents such as tax returns and bank statements from their abuser in order to verify their income or lack of income. In addition, abusers commonly prevent survivors from working, and thus the survivor is completely financially dependent upon the abuser, often with little to no access to any financial information. In many cases, abusers do not include the victim on the tax return and victims may not be able to file taxes on their own accord. Abusers often monitor victims' computer and phone use and may prevent them from having any form of financial independence, including having a bank account or meeting with a tax preparer. More importantly, for a survivor who has just left an abusive situation, previous tax returns are not reflective of their current financial situation.</p> <p>For these reasons, flexible fee waiver guidance and practice have been and are absolutely essential for immigrant survivors to access critical protections created by VAWA and the TVPA.² The Proposed Revision Will Create Burdens for Service Providers Assisting Survivors.</p> <p>For over 20 years, USCIS has employed a flexible standard for survivor fee waivers to ensure they did not deter or deny eligible survivor applications. The stringent requirements that each family member will need their own I-912 fee waiver and the limitations on documents to show income will cause unnecessary delay and burden for survivors and further drain the limited time, capacity and resources of service providers who assist them.</p> <p>Requiring each applicant/petitioner and all derivative beneficiaries to submit their own form will be a huge resource and time burden on applicants and our staff, which ultimately means we will be able to help fewer vulnerable individuals. Currently, family members can submit a single fee waiver application. According to the proposed revisions, a separate I-912 must be filed for each family member, along with the required documentation, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS. Instead of completing just one form</p>

ID	Comment.	Commentor	Comment
1206	USCIS-2010-0008-0972	Irena Sullivan, Tahirih Justice Center	<p>Comment part 2: b. Under the proposed revision to Form I-912, survivors’ meritorious fee waiver requests will largely be denied; they often have no access to primary evidence of income due to extremely low wages, and/or manipulation and control by abusers.</p> <p>Survivors requesting fee waivers commonly submit evidence that they receive whatever means-tested benefits they are eligible for in their state, rather than evidence of income such as pay stubs or tax returns. Survivors who are able to work have limited if any access to such evidence for a variety of reasons. Most notably, as explained above, abusers maintain strict control over documentation relating to every aspect of their lives.</p> <p>In addition, survivors authorized to work who are self-employed or paid in cash for low paying jobs likely do not have pay stubs to demonstrate income. Those who do receive pay stubs might not be able to show income for a 30 day period if they change jobs frequently due to the nature of the industry they work in, childcare issues, harassment because they are immigrants, or termination as a result of trauma-related absences. Those with small children who work part-time, or survivors with extremely low paying jobs are not required to file tax returns and may have no evidence to submit. Finally, applicants may be unable to obtain copies of tax returns if they relied on notaries who fraudulently claimed to file them on their behalf.</p> <p>In one example, Maria*, from Honduras, endured years of domestic and sexual violence. She applied for asylum, and received her first work authorization which did not require a fee. Maria worked as a babysitter and sold food. She applied to renew her work authorization while her asylum case was pending, requesting waiver of the fee for the renewal. Because of the nature of her work, she was unable to submit pay stubs. Instead, she provided proof that she receives subsidized medical care through her county public health system, which is a benefit only available to those whose household income is under 150% of the poverty guidelines. Her request was granted, and she continued working. Maria’s fee waiver request would have been denied under the proposed revision to Form I-912, leaving her unable to afford the work authorization renewal filing fee. Without a job, Maria would have faced eviction while awaiting adjudication of her asylum application. Tahirih also assists women who apply for relief as VAWA self-petitioners abused by U.S. citizens or Legal Permanent Resident spouses. In these cases, fee waivers are important because the adjustment of status application requires a fee, as does the request for renewal of employment authorization. Petitioners such as our client Anna* must renew work authorization regularly while they await their priority dates for filing applications to adjust status, or while their applications for adjustment of status are pending. If they cannot obtain fee waivers, they risk remaining in limbo indefinitely despite eligibility for a green card.</p> <p>Survivors who otherwise qualify for fee waivers should not be denied because they have no access to certain evidence, but can otherwise establish that they are indigent by showing that they have received means-tested benefits.</p>
38	USCIS-2010-0008-0181	Lou DeLeon	Please retain the Fee Waiver for low-income people to become US citizens
39	USCIS-2010-0008-0180	Jacky Wu	the federal agency (USCIS) that oversees the naturalization process is proposing a change that will make it harder for low-income people to become U.S. citizens, please lower the fee.

ID	Comment.	Commentor	Comment
48	USCIS-2010-0008-0198	Darren Brown	<p>I strongly opposed making the path to citizenship even more difficult. We are a nation of immigrants This is who we are. I was raised on the belief that you can come to this country and work hard and succeed that that is becoming more of a myth everyday. Don't allow cynicism and fear of immigrants to turn our nation into a nationalist, wall-building, place of hate.</p> <hr/>
50	USCIS-2010-0008-0197	Dayle Friedman	<p>I strongly oppose the proposed change to the fee waiver for citizenship. We are a country that is enriched by the contributions of immigrants. Almost all of us can trace our roots to immigrants. Personal wealth should not be a condition for citizenship, nor should limited means be a barrier. There is no need and no justification for this proposed, un-American change. I urge that the proposed change be rescinded.</p> <p>Sincerely yours, Rabbi Dayle Friedman</p>

ID	Comment.	Commentor	Comment
63	USCIS-2010-0008-0203	Nora Privitera	<p>1. This proposal will prevent thousands of low-income individuals from accessing their rightful immigration benefits.</p> <p>(a) The I-912 Fee Waiver is available to waive the fee for applications for many lawful immigration benefits, including adjusting to lawful permanent residency, getting replacement documents, filing appeals of decisions, and becoming a citizen.</p> <p>(b) Removal of this evidentiary option will inevitably prevent many immigrants from filing eligible applications.</p> <p>(c) This proposal indicates that USCIS has disdain for the rights and wellbeing of low-income immigrants, which runs contrary to the organizations stated mission of fairly adjudicating requests for immigration benefits.</p> <p>2. This proposal ignores the reality of disparate costs of living across the United States:</p> <p>(a) The U.S. Department for Health and Human Services only publishes poverty guidelines for the continental 48 states, Hawaii, and Alaska. This means that the same income cut off is used for all continental states.</p> <p>(b) Means tested benefits use different metrics in different parts of the country because the United States is a diverse country, and the cost of living varies regionally.</p> <p>(c) Social services agencies and state legislators have acknowledged this reality by setting income guidelines for means tested benefits that are relative to the regional and local costs of living.</p> <p>(d) This proposal would ignore this rational and relevant determination in favor of an insufficient national standard that does not take into account the lived experiences of applicants for fee waivers.</p> <p>3. This proposal would significantly increase the time and paperwork required to file an I-912.</p> <p>(a) With only two evidentiary options, applicants are likely to need to pay for additional legal representation and submit additional paperwork.</p> <p>(b) Filing the I-912 on the basis of financial hardship requires applicants to detail their situation, all assets, and all expenses and liabilities, as well as provide documentation for all claims.</p> <p>(c) In the alternative, applying on the basis of a means tested benefit requires the applicant to list and document the benefit received, nothing more.</p> <p>(d) This change will therefore disincentivize legal representatives from taking on cases for the most disadvantaged in our society due to the increased time and paperwork required for filing applications.</p> <p>I urge you to reject this proposal because it is contrary to the national interest of the United States, in that it will keep more people in the shadows who actually qualify for immigration benefits, and thereby prevent them from making a contribution to this country. This country was built by the labor of immigrants.</p>

ID	Comment.	Commentor	Comment
64	USCIS-2010-0008-0201	Bibie Adesioye	<p>Proposal will prevent thousands of low-income individuals from accessing their rightful immigration benefits.</p> <p>The I-912 Fee Waiver is available to waive the fee for applications for many lawful immigration benefits, including adjusting to lawful permanent residency, getting replacement documents, filing appeals of decisions, and becoming a citizen.</p> <p>Removal of this evidentiary option will inevitably prevent many immigrants from filing eligible applications.</p> <p>This proposal indicates that USCIS has disdain for the rights and wellbeing of low-income immigrants, which runs contrary to the organizations stated mission of fairly adjudicating requests for immigration benefits.</p> <p>Proposal ignores the reality of disparate costs of living across the United States.</p> <p>The U.S. Department for Health and Human Services only publishes poverty guidelines for the continental 48 states, Hawaii, and Alaska. This means that the same income cut off is used for all continental states.</p> <p>Means tested benefits use different metrics in different parts of the country because the United States is a diverse country, and the cost of living varies regionally.</p> <p>Social services agencies and state legislators have acknowledged this reality by setting income guidelines for means tested benefits that are relative to the regional and local costs of living.</p> <p>This proposal would ignore this rational and relevant determination in favor of an insufficient national standard that does not take into account the lived experiences of applicants for fee waivers.</p> <p>Proposal would significantly increase the time and paperwork required to file an I-912.</p> <p>With only two evidentiary options, applicants are likely to need to pay for additional legal representation and submit additional paperwork.</p> <p>Filing the I-912 on the basis of financial hardship requires applicants to detail their situation, all assets, and all expenses and liabilities, as well as provide documentation for all claims.</p> <p>In the alternative, applying on the basis of a means tested benefit requires the applicant to list and document the benefit received, nothing more.</p> <p>This change will disincentivize legal representatives from taking on cases for the most disadvantaged in our society due to the increased time and paperwork required for filing applications.</p>

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66	USCIS-2010-0008-0211	Jacqueline Saavedra	<p>The proposed changes are unnecessary and unacceptable for the following reasons. This proposal will prevent thousands of low-income individuals from accessing their rightful immigration benefits. The I-912 Fee Waiver is available to waive the fee for applications for many lawful immigration benefits, including adjusting to lawful permanent residency, getting replacement documents, filing appeals of decisions, and becoming a citizen. The removal of this evidentiary option will inevitably prevent many immigrants from filing eligible applications. - This proposal indicates that USCIS has disdain for the rights and well-being of low-income immigrants, which runs contrary to the organization's stated mission of fairly adjudicating requests for immigration benefits.</p> <p>The proposal ignores the reality of disparate costs of living across the United States. The U.S. Department for Health and Human Services only publishes poverty guidelines for the continental 48 states, Hawaii, and Alaska. This means that the same income cut off is used for all continental states. Means tested benefits use different metrics in different parts of the country because the United States is a diverse country, and the cost of living varies regionally. Social services agencies and state legislators have acknowledged this reality by setting income guidelines for means tested benefits that are relative to the regional and local costs of living. This proposal would ignore this rational and relevant determination in favor of an insufficient national standard that does not take into account the lived experiences of applicants for fee waivers. Proposal would significantly increase the time and paperwork required to file an I-912. With only two evidentiary options, applicants are likely to need to pay for additional legal representation and submit additional paperwork. Filing the I-912 on the basis of financial hardship requires applicants to detail their situation, all assets, and all expenses and liabilities, as well as provide documentation for all claims. In my experiences, they are very rarely ever granted and I have personally struggled with getting one submitted through financial hardship with clients who may have never had to file taxes before they have never worked. Currently, applying on the basis of a means tested benefit requires the applicant to list and document the benefit received, nothing more. This change will disincentivize legal representatives from taking on cases for the most disadvantaged in our society due to the increased time and paperwork required for filing applications. Please do not make these changes as victims all across the United States will suffer financial harm on top of the harm of not being able to apply for immigration benefits that they are eligible for.</p>

ID	Comment.	Commentor	Comment
74	USCIS-2010-0008-0221	Mary Landrum	I am writing in support of the fee waiver for immigrants. The Fee-Waiver, often known as I-912, is important because it is used by many people who are ready to naturalize but simply do not have the financial means to pay the \$725 fee. Often, multiple family members naturalize at the same timemaking it cost prohibitive for even a family of four. Currently, if you are receiving food stamps, that would qualify you and your family for a fee waiver. With the proposed changes, that same person would now need to show that their income is at or below 150 percent of the Federal Poverty Guidelines (FPG) in order to be eligible. The receipt of benefits as proof of poverty would be no longer accepted. This will make naturalization unreachable for many people who will then be faced with impossible choices, like choosing between their public benefits or applying for Citizenship.The American Dream should be available to all immigrants, regardless of their economic status.
75	USCIS-2010-0008-0223	Shannon DeSantis	We are a country of immigrants. Let us be welcoming and make an immigrant's journey to citizenship and a refugee's request for asylum feasible. Continue to allow a request for fee waiver.
79	USCIS-2010-0008-0215	Sara Meldrum	I oppose the changes to the information collection process described. Rather than reducing the burden on applicants, the changes would eliminate existing proofs of eligibility, and would also render some applicants ineligible for the waiver. Individuals and families that have met all the other requirements for naturalization should not be prevented from naturalizing by their inability to pay the fee.

ID	Comment.	Commentor	Comment
90	USCIS-2010-0008-0228	Anne Henderson	<p>This proposed policy would be detrimental to so many citizenship applicants who definitely qualify for the fee waiver, but may not have taxes or income statements to prove it. I work with many Vietnamese seniors, who may live with their families or receive support from family members, and otherwise subsist mainly off of food stamps and food banks. These residents do not file taxes and have no W2s or pay stubs to prove their low-income status. How then would they even be able to apply for citizenship if they have no acceptable documents to file with their fee waiver?</p> <p>Additionally, DSHS goes through rigorous screening to confirm the low-income status of benefits recipients, so it seems absurd that this qualification would not be a sufficient means of proving low-income status. It is, after all, a government agency, so why not keep the continuity between agencies and trust that DSHS is a legitimate tester of means?</p> <p>Also, the amount of time and resources that will need to go into collecting adequate low-income documentation will put a severe strain on immigration service providers. I am a program coordinator for a citizenship program and I can tell you that getting someone's awards letter from DSHS is the easiest and least time-consuming way of verifying someone's low-income status. For those seniors especially who are not receiving income, figuring out an alternative way of testing their means would be extremely time-consuming for attorneys and case managers.</p> <p>This policy is obviously aimed at some of our most vulnerable LPRs to prevent them from naturalizing, and would be a waste of resources on the service provider's end. Please do not implement it.</p>
92	USCIS-2010-0008-0227	Nancy Russell	<p>This proposal is a back-door method of limiting family immigration and reunification and could suppress naturalization rates among immigrants.</p> <p>I disagree with this proposal.</p>

ID	Comment.	Commentor	Comment
102	USCIS-2010-0008-0232	Rona Buchalter	<p>I believe that income should not be a factor in admitting someone to the us. This rule punishes those who are working mightily to make ends meet - our kindergarten teachers, health care aides, and the like. Removing fee waivers for these people presents an unnecessary barrier to them becoming legal permanent residents or us citizens.</p> <p>USCIS should not be funding its operation through fees to low-income residents.</p>
107	USCIS-2010-0008-0276	Rebecca Brown	<p>I oppose the proposed revision because immigrants and many elderly people with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. Because their incomes are so low, they are not required to file taxes, so they can't use tax forms to verify their incomes, as this proposed rule would require. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application. This is absolutely and transparently a ploy to make citizenship more difficult to attain.</p>
111	USCIS-2010-0008-0259	Ratsamy Bounking	Keep the path to citizenship open
112	USCIS-2010-0008-0264	Cory Goldhaber	Please don't make it harder for people to become US Citizens. These are people who did all the things we've asked of them. Don't make the hurdle even higher.
114	USCIS-2010-0008-0267	Carina del Rosario	<p>Fee waivers ensure that people who have very little means don't have to choose between what basic needs they have to pay for. This proposed revision would make it harder for people who are poor to secure citizenship, denying them the equal rights, opportunities and responsibilities as wealthier immigrants and citizens. This is absolutely wrong.</p> <p>Please stop efforts to make citizenship only accessible to those who can afford it.</p>

ID	Comment.	Commentor	Comment
116	USCIS-2010-0008-0260	Julia Wignall	Please consider not raising the fee to apply for citizenship. The process of applying of citizenship is already inequitable for individuals who English is not their first language and for those who may need citizenship the most--refugees and survivors of violence who often experience financial hardship and barriers to stable employment. I recommend that an equitable fee be created. Those who are applying for citizenship through jobs or report a high level of income on tax returns should cover more of the burden for others.
118	USCIS-2010-0008-0275	Varsha Govindaraju	This proposed revision would make it much harder to prove eligibility for a fee waiver, hurting the very people who need it the most, especially elderly and disabled applicants. The \$725 fee to apply for citizenship poses a significant barrier for many who are eager to naturalize, and fee waivers help remove that barrier.
125	USCIS-2010-0008-0272	Michelle Verkist	It costs several hundred dollars to apply to become a citizen. USCIS proposes to make proving eligibility for the fee waiver more difficult, if not impossible, for people who cannot afford the application fee to become citizens. Studies show that immigrants contribute to a net economic gain for our economy. Those with the lowest incomes should not be prevented from becoming citizens because of changing standards to prove their eligibility.

ID	Comment.	Commentor	Comment
126	USCIS-2010-0008-0269	Debra Everson	<p>Please do not take away the fee waiver rule for immigrants who are applying for citizenship. I and my generation of family members would not be here as productive taxpaying, contributing citizens of the US if my relatives were confronted with roadblocks such as this as they worked, learned English and ultimately applied for and then became citizens. We are undermining the fabric of diversity which has historically made our country rich in ideas, discourse, opportunity and wealth.</p> <p>Look at the larger picture and take a historical view of our values of where we have been and where we want to be. We should continue to act as a land of opportunity and not one of oppression. Let's turn the tide of all this divisiveness and polarization that is becoming more and more prevalent.</p> <p>Thanks, Debra Everson</p>
133	USCIS-2010-0008-0287	Stephanie Zangwill	<p>I am opposed to this revision of the "fee waiver" policy. I believe the intent is to reduce the number of petitions from a population that is legally entitled to apply for various USCIS services. This can only reduce the number of applications for things like DACA, Temporary Protected Status, green cards, and ultimately citizenship plus more. Instead of making it easier to apply and file petitions for a variety of USCIS services, this proposal makes it harder. I respectfully request that the proposal be withdrawn. This is in regards to OMB Control Number 1615-0116 in the body of the letter, proposed by USCIS, with Docket ID USCIS-2010-0008.</p> <p>Thank you for your attention.</p>

ID	Comment.	Commentor	Comment
134	USCIS-2010-0008-0280	Irene Muller	Poverty should not be a pre-requisite for basic human rights. What has always made our country great is the potential for it to be a land of opportunity. Denying good people who want to build a better United States alongside those already granted citizenship or naturalized as documented residents are owed the right to be represented and supported throughout the immigration process without being subject to arbitrary income thresholds.
140	USCIS-2010-0008-0284	Mardys Leeper	<p>The purpose of this letter is to oppose OMB Control Number 1615-0116, Docket ID USCIS-2010-0008.</p> <p>This is one more way to prevent low income families from obtaining citizenship. My grandparents were low income immigrants. Yet my dad and his siblings overcame poverty and became successful citizens.</p> <p>The American Dream was actualized by low income immigrants. Do not allow this revision of the fee waiver accessibility.</p>

ID	Comment.	Commentor	Comment
144	USCIS-2010-0008-0278	George Allan	<p>My name is George Allan. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS. I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. I oppose it because it would be an expensive and time-consuming burden for low-income individuals who are not required to file tax returns. The rule is a rather obvious attempt to make it more difficult for immigrants to this country to become citizens, an aspiration that should be encouraged rather than discouraged. I myself am an immigrant to the United States, and, like most immigrants, am a hard-working professional who has given as much to my adopted home as it has given back to me. Immigration is a net positive in almost all countries, and it should be obvious, given the history of the United States and its standing in the world, that it has helped make us as strong as we are. The current anti-immigrant environment will, I believe, ultimately be to the detriment of future generations of Americans if it persists. Therefore, I oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS.</p>
147	USCIS-2010-0008-0301	Gerald Lubert	<p>The proposed Fee Waiver rule would limit who qualifies for a free waiver. The proposed rule will no longer accept proof of a means-tested benefit to show inability to pay the filing fees. Immigrants could be barred for ever becoming naturalized citizens because of the inability to pay filing fees. This forces people to live in limbo between status. USCIS should continue to rely on proof of a means tested benefit when deciding if a person qualifies for a fee waiver. This is just one more way the government is trying to enforce the public charge rule.</p>

ID	Comment.	Commentor	Comment
151	USCIS-2010-0008-0302	Marilyn McAllister	<p>My name is Marilyn McAllister. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008.</p> <p>I am a volunteer for Agency for New Americans, a 501(c)(3) organization that helps refugees resettle in Boise Idaho. Our partnering agencies help new arrivals apply for U.S. citizenship with free assistance from volunteer attorneys. Over the years, many of the clients we serve have been eligible for fee waivers based on receipt of public benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people.</p> <p>Idaho has one of the lowest minimum wages in the country. Many clients are working multiple jobs but still cannot afford the \$725 filing fee. Immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p>

ID	Comment.	Commentor	Comment
152	USCIS-2010-0008-0311	Christina Guros	<p>I enthusiastically oppose the proposed change to the fee waiver process because it ignores the shared economic benefits of naturalization.</p> <p>The change to the fee waiver form signifies preventing legal permanent residents from accessing a path to naturalization due to their inability to pay for the process. Low-income green card holders who are unable to get proof of their lack of income will be unable to file for naturalization. This is completely against the intention written into law of allowing those who are unable to pay U.S. Citizenship and Immigration Service filing fees a waiver of the fee requirement. It also denies them access to the economic improvements associated with naturalization.</p> <p>The recent rule changes proposed by the Department of Homeland Security make it clear that the agency intends to punish and reject low-earning and low-income immigrants. A 2010 study from the Economic Policy Institute shows that immigrant workers who are naturalized U.S. citizens experience lower levels of poverty than non-naturalized immigrants (https://www.epi.org/publication/bp256/). If the administrations intention is to encourage immigrants to be self-sufficient and stimulate our economy, eliminating the path to citizenship for eligible green card holders is the wrong decision. The proposal to change the fee waiver process can only be seen as a punitive and counterproductive policy decision.</p> <p>A 2012 study by the Migration Policy Institute further bolsters the argument that encouraging immigrants to naturalize increases their economic success and improves the overall economy. After controlling for observable differences between naturalized and non-naturalized immigrants, this study shows the naturalized citizens are less likely to experience unemployment and in fact earn 50 to 70 percent more than non-naturalized immigrants (https://www.migrationpolicy.org/research/economic-value-citizenship).</p> <p>The proposal to change the fee waiver would prevent eligible lawful permanent residents from being able to prove they are eligible for a fee waiver, and therefore be unable to file the naturalization application. Temporary economic setbacks should not prevent eligible green card holders from the opportunity to naturalize, a process shown to increase a naturalized citizens earnings. If this proposed rule change does get implemented, it is a clear statement that the intended purpose is solely to make suffer immigrants who are legally accessing safety net assistance.</p> <p>For these reasons and many, many more, I oppose the proposal by DHS to change the fee waiver form and process.</p>
161	USCIS-2010-0008-0295	Lynn Ludwig	<p>Benefit letters should still be accepted. Not all applicants file income taxes.</p> <p>We want those eager to be Americans to have the opportunity, and citizenship should not be sold!</p>
172	USCIS-2010-0008-0317	Cecilia Silberstein	<p>Hey!</p> <p>Dont make it harder to apply for a green card. We want to make this a healthier, more welcoming, safer country... youre literally trying to make people feel unsafe and unstable and close off green cards to the wealthy.</p> <p>So basically dont do it!</p> <p>Thanks!</p>

ID	Comment.	Commentor	Comment
176	USCIS-2010-0008-0322	James Little	This proposal of the United States Citizenship and Immigration Services of changing the eligibility for fee waivers for lower-income immigrants on the path to legal permanent residency and U.S. citizenship is an attempt to limit family immigration and to suppress naturalization rates. I oppose this change.
179	USCIS-2010-0008-0325	Bailey Bonaci	I oppose the change USCIS is making because it will make becoming a citizen harder than it already is, especially for the low income members of the immigrant community. The several hundred dollar citizenship application fee is a huge hinderance to becoming a citizen. This change would also make it more difficult for green card renewals, getting work permits, and helping children become citizens. There are plenty of barriers to citizenship in the US we do not need to add more.
180	USCIS-2010-0008-0334	Jean Edelhertz	<p>I respectfully object to this proposed rule change.</p> <p>People with the lowest incomes should not be prevented from becoming citizens because of these new standards to prove eligibility.</p> <p>Many low-income individuals, both the elderly and those with jobs, are not required to file federal income taxes. Therefore, they would not have an income tax return to submit as proof of eligibility.</p> <p>I urge you to keep citizenship application open to all, regardless of means, by retaining the current process and not pursuing this proposed change.</p> <p>Thank you for your consideration.</p> <p>Jean</p>

ID	Comment.	Commentor	Comment
181	USCIS-2010-0008-0326	Sally von Bargaen	I OPPOSE THIS RULE CHANGE! The proposed rule is designed to impede and reduce legal immigration. Never in our nations history have we said that you have to be comfortably middle class to become an American. We didnt say that to Alexander Hamilton, or Andrew Carnegie, or the founders of Google and WhatsApp, or countless other immigrants who came here with next to nothing, worked hard and made this country great.
182	USCIS-2010-0008-0331	Alyssa McFarland	I object to the plan to make it more difficult for would-be US citizens to get a fee waiver. I work with monastics who earn a small stipend each month, too small to require them to file income taxes. When they obtain citizenship after many years of connecting with those in the faith community, they are so happy and proud to be US citizens, and so are those who rely on their counsel and guidance. Requiring tax returns to obtain a fee waiver would pose an unnecessary hardship on future monastics who would like to obtain US citizenship.
192	USCIS-2010-0008-0336	Florence Sum	I oppose the proposed revision because it is inequitable and does not serve the people who want and are able to naturalize through this process. Immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver.
198	USCIS-2010-0008-0407	Lynn DeBroeck	I oppose the proposed rule change on Fee Waivers as this is another inhumane rule that is unfair and has no basis for its proposal. It is obvious that this is only being proposed to hinder migrants and does not serve any real purpose other than this hindrance. This will be more inefficient and wasteful as well as inhumane. This rule is shameful and as an American citizen I am deeply disappointed in the Trump administration for its ridiculous accusations against asylum seekers and hope that a more humane approach will be considered and this rule never enacted. Sincerely, Lynn DeBroeck

ID	Comment.	Commentor	Comment
204	USCIS-2010-0008-0390	Linda Bevis	<p>I am commenting on OMB Control Number 1615-0116, about regulations proposed by USCIS. Docket ID USCIS-2010-0008.</p> <p>I disagree with these regulations and ask that they not be adopted. These regulations will make it more difficult to apply to be an American citizen. If people have to prove, yet again, after laboriously gathering documents, that they need a fee waiver to apply for citizenship, than that will chill people's ability to apply. We want people who are legally in the country and contributing to our culture, society, and economy, to become citizens. They will be able to contribute even more that way -- and they will feel safer. They are often the parents of US citizen children, and we want these families to feel safe and welcome in our country. If they need a fee waiver, then they have already shown this under the current regulations with a means-tested benefits letter. They shouldn't have to duplicate their efforts. Plus, by making them duplicate their efforts, you may frustrate some people to the extent that they don't apply at all. Or they may apply for citizenship, but somehow manage to pay the full fee. This takes away money from the family's food, housing, school supplies, clothing, and other necessities. None of this is fair. None of this is how you or I would want to be treated if we were applying for citizenship.</p> <p>Do not implement these regulations.</p> <p>Thank you, Linda</p>
205	USCIS-2010-0008-0397	Abraham Zellman	<p>It is imperative that the exemption remains available for immigrants and those seeking refugee status. Our country needs to remain the compassionate, welcoming place that we claim it to be! Don't allow the fate of innocent families seeking a better life to be threatened with this act of power. Keep the exemption available!!</p>

ID	Comment.	Commentor	Comment
208	USCIS-2010-0008-0410	Sarah Sumadi	<p>Hello, I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008.</p> <p>My father is a naturalized citizen, and I know firsthand the value that naturalization brings to our country and our communities. When my father applied for naturalization in the 1980s, he paid a fee of less than \$100. Since then, filing fees have skyrocketed, wildly out of step with the inflation rate. \$725 in today's dollars would have been equivalent to about \$1,700 in 1983, when my father naturalized. If that had been the fee then, he never would have been able to apply. Since then, he has started a successful business, bought a home, sent me to college, and voted in every election.</p> <p>Especially since the naturalization filing fee is astronomically high, and higher than we've ever seen it in the history of our country in proportion to income levels, we need to preserve the means-tested benefit-based I-912 in order to maintain access to naturalization for working people who are not wealthy. The current method of proving eligibility using a state or local agency's independent income verification works and does not need to be changed. Doing away with this eligibility basis will simply price people out of citizenship.</p> <p>Moreover, since USCIS is almost exclusively funded by fees - not by federal appropriations - the cost of these fee waivers is borne by other full fee-paying applicants for other immigration benefits. The rule does not save general taxpayers any money, and will in fact cost USCIS more money. Lockbox staff will spend significant time learning how to analyze income, wage and tax documentation, and then significant time scrutinizing this income, wage and tax information in deciding fee waivers. They'll waste money on postage, sending fee waiver applications back to the applicant over and over again to add additional documentation. This will increase the already long processing times to decide N-400s.</p> <p>Citation for inflation data: \$725 in 1985 2018 Inflation Calculator. U.S. Official Inflation Data, Alioth Finance, 13 Nov. 2018, https://www.officialdata.org/1985-dollars-in-2018?amount=725.</p>
209	USCIS-2010-0008-0403	Abubakar Rufai	<p>I'm a former refugee whose family get the benefit because of their income it will be hard for new refugee who just came to the US to afford the USCIS fees</p>

ID	Comment.	Commentor	Comment
210	USCIS-2010-0008-0362	Jagoda Perich- Anderson	<p>I strongly oppose the proposed fee waiver rule. I came to the U.S. as a child with my family and it was one of our proudest moments when we became citizens. We chose U.S. Citizenship because we believe in the values this country has codified into the Constitution and Bill of Rights.</p> <p>The proposed fee waiver rule, as I understand it, will be a huge burden on applicants and it isnt clear to me why this is necessary. In fact, it seems that it will add to the costs of processing applications. Costs that I as a taxpayer would have to pay for without clear evidence of any benefit.</p> <p>It strikes me that these rules are intended to only make it harder for people to apply for and eventually be granted citizenship. Why? Naturalized citizens have proven themselves generation after generation to be as, if not more, productive to the U.S. economy than born citizens. They are active in their communities. They are loyal, like my family, to the values the U.S. stands for at home and in the world.</p> <p>Dont make it harder for people to become citizens. Instead focus efforts and resources on policies that strengthen immigrants ability to become citizens, and to support themselves and their families.</p> <p>I ask that you immediately withdraw the proposed revisions to Form I-912</p>

ID	Comment.	Commentor	Comment
211	USCIS-2010-0008-0391	Brian McMahan	<p>I am opposed to the change for the waiver to become a US citizen.</p> <p>People who wish to do the right thing by becoming a legal US citizen are often the most vulnerable persons who often cannot afford to pay the \$750 fee. Currently they are able to provide documentation, which is reasonable.</p> <p>Under the proposed change, the documentation required makes it nearly impossible for the person to become a US Citizen. The fee waiver requirements of providing a tax return is very difficult for those that do not make enough money to file a tax return. So this does not make for an easy process for the person who is trying to do the right thing.</p> <p>The current benefit letter is the easiest way to prove the low income and works well today. By no longer using this, it creates more work for government worker to process as well as acts as a barrier to the person wishing to gain citizenship.</p> <p>Please consider this fact that we are making a practice that makes it more difficult in the process and seems to create barriers and not make it practicable for those who wish to follow the process and become legal US Citizens and be productive in our society for the betterment of all.</p> <p>Thanks</p>
213	USCIS-2010-0008-0386	Jim Perich- Anderson	<p>I am writing in opposition to the proposed U.S. Citizen and Immigration Services revision to the fee waiver rules for those applying for citizenship. The removal of this waiver would create a bureaucratic boondoggle, generating paperwork that is not necessary, as it is redundant to information currently confirmed by other agencies and provided to U.S. CIS. This revision also creates a burden for the working American family relatives assisting those applying for citizenship. This proposed revision hurts our economy by worsening our labor shortage; discouraging new immigrants who are able and willing to accomplish low wage jobs.</p>

ID	Comment.	Commentor	Comment
229	USCIS-2010-0008-0382	Ann Kersker	Immigrants are our most important resource. Lets make it easier for citizenship not harder.
239	USCIS-2010-0008-0361	Angela Bartels	I support the current waiver for fee for applying for US citizenship. I do not support that additional documentation needs to be provided. A change in this rule would penalize people who are eligible for US citizenship unduly. People should not have to choose between paying the rent, buying food, putting gas in their car, paying their utility bill so that they can apply for US citizenship. I oppose changing this waiver as it now stands.
242	USCIS-2010-0008-0405	Robert Power- Drutis	Like almost every American citizen, my family is a family of immigrants. While today we are a family of researchers, nurses, police officers, national park rangers, doctors, accountants, and non-profit organizers, when my family first arrived in this country each and every person had nothing but the cloths on their backs. My great grandparents worked as migrant farm hands, low paid loggers, and a dozen other things that were barely able to keep their family fed. This proposed change does nothing but increase the barriers for hard-working families to enter our country. It targets people like my great-grandparents and says not only that you do not want new immigrants to come to our country but that you do not want my family to be here as well. My family arrived uneducated, untrained, and unwanted but fought tooth and nail for an American Dream - not for themselves, but for me, for my sister, for my brother, and for our children. Please, do not allow this change to happen. Please keep the dream alive.
244	USCIS-2010-0008-0350	Eric Baumgarten	I oppose the proposed changes to USCIS. A path to citizenship should be free and accessable to everyone regardless of income level.

ID	Comment.	Commentor	Comment
246	USCIS-2010-0008-0367	Maria Zepeda Flores	USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application. Many low-income individuals are not required to file federal income taxes even if they are employed, meaning that even even if they're eligible, they will not be eligible for the fee waiver that keeps them from having to choose whether to be come a citizen, or pay for much needed food or take care of other medical needs.
248	USCIS-2010-0008-0364	Kathryn Rathke	<p>Hello,</p> <p>I am writing in support of continuing the fee waiver methods already in use for future citizens. I have volunteered over the the past few years to help permanent residents with their applications, as I think it must be a very daunting and confusing process, particularly for the older folks. These applicants deeply impress me with their commitment to the process, showing up with huge armloads of documents that they must provide as evidence for all the many requirements. You must be really dedicated to the citizenship enterprise to have everything in order when it comes time to fill out the application. I am very very concerned, therefor, that the new rules which allow only taxes as evidence will be a pretty big hardship for these good folks, and may even be insurmountable in many situations.</p> <p>In all of my encounters with applicants, I never once even had to deal with a fee waiver. People who appeared to me to be of very modest means are not inclined to ask for one, they are independent and don't like to ask for help, and may even have felt that it could hurt their chances if they asked for a fee waiver. So I can only think that the folks who do ask for one really need it. Let us not add to the hardship of these poor vulnerable folks by creating a new hurdle for them.</p> <p>Thank you!</p>

ID	Comment.	Commentor	Comment
252	USCIS-2010-0008-0400	Vinay Aditya	<p>Dear Sir/Madam,</p> <p>This great country is built on immigrants and has always been a shining light for opportunity, to a better way of living. In a move that will harm the most vulnerable in our immigrant communities, USCIS, the federal agency that oversees the naturalization process, is proposing a change that will make it harder to become a U.S. citizen. It costs several hundred dollars to apply to become a citizen. USCIS proposes to make proving eligibility for the fee waiver more difficult, if not impossible, for people who cannot afford the application fee to become citizens. Studies show that immigrants contribute to a net economic gain for our economy. Those with the lowest incomes should not be prevented from becoming citizens because of changing standards to prove their eligibility. Please reconsider and do not enact this rule change.</p> <p>Thank you.</p>
253	USCIS-2010-0008-0388	Elizabeth Turner	<p>Making it much harder for people to apply to become citizens is ridiculous. We should be encouraging people to become citizens.</p> <p>I am a former Consular Officer and loved processing Immigrant Visas and helping people start on this long process of becoming a citizen.</p> <p>Income or lack of income should not be a determinant in the citizenship process. This procedure should be simplified and fast tracked.</p>
254	USCIS-2010-0008-0385	Margaret Chasan	<p>An mark of a civilized society is how well it protects its most most vulnerable. In the past America has been seen as a light to those seeking a better way of life. We should not make this process harder for those least able to afford it.</p>

ID	Comment.	Commentor	Comment
258	USCIS-2010-0008-0380	Stephen Dworkin	<p>New citizens are a cultural and economic boon for American society. As the grandson of immigrants who sought refuge in the United States after the horrors of World War II, I believe it is essential that our nation finds ways to incentivize legal citizenship instead of building barriers and roadblocks. I strongly object to USCIS's proposed revision because it would create a process that is discriminatory towards low-income immigrants, exacerbating the problems of visa overstays and immigrant populations living in the shadows while stifling our ability to naturalize hard-working, aspirational individuals who deliver strong dividends for our economy and society.</p>
259	USCIS-2010-0008-0384	Jessica Lah	<p>I strongly oppose the proposed fee waiver rule because the efforts required to obtain documentation are unrealistic and unjust. My family has been American citizens going back to the 1700's, and if I were to apply for the same fee waiver, I guarantee, the hurdles and understanding of bureaucratic system would be to high for me to get over.</p> <p>My husband immigrated from Russia in 1988 and is the son of a doctor and engineer. When they arrived, they had little money and resources. My husband's father worked as a pizza delivery driver because that's the only job he could get, and his mother worked as a volunteer at a health clinic. Accessing state benefits helped them get started and now they today they work as an engineer and nurse. My husband works as a programmer and his brother as a doctor.</p> <p>The proposed revision is punitive, unnecessary and places a huge burden on applicants. In-come based fee waivers are unrealistic when they require a tremendous amount of documentation that is burdensome to prepare.</p> <p>I strongly urge the Trump Administration to withdraw the proposed revision in Form I-912</p>

ID	Comment.	Commentor	Comment
263	USCIS-2010-0008-0346	Lisa Nikodem	<p>Hello,</p> <p>Please do not make the proposed changes to the application fee waiver system. In the US, we are lucky, and we have an opportunity to truly help people who want to be part of our beautiful country. We must not make it more difficult for people to apply for citizenship.</p> <p>-Lisa</p>
264	USCIS-2010-0008-0345	Christina Guros	<p>I ardently oppose the proposed change to the fee waiver process because it ignores the benefits to our economy of naturalizing eligible legal permanent residents.</p> <p>Becoming a U.S. citizen correlates with an increase in income and economic wellbeing for families. A 2012 University of Southern California study found that naturalization is correlated with an 8 to 11 percent increase in ones earnings (https://dornsife.usc.edu/csii/citizen-gain/). The study takes out the economic comparison between those with legal status and those without, to show the economic gain specific to naturalizing. This means that the ability to naturalize has huge implications for family income and wellbeing, as well as local communities and the national economy. If even half of the population of lawful permanent residents eligible to naturalize became U.S. citizens, the low-ball estimate would be aggregate earnings increase of \$21 billion. This is only the earnings increase and does not estimate the full benefit of increased spending on the economy.</p> <p>Naturalized citizens are also more likely to be financially invested in the U.S. economy. They more often buy a home and pay off their home loans than non-U.S. citizens. According to a George Washington University report using U.S. Census Bureau data, 34 percent of non-citizen households are owner occupied compared with 66 percent of naturalized citizen households (http://www.facethefactsusa.org/facts/homeownership-more-likely-when-immigrants-us-stay-longer/). Other studies show that naturalized citizens are more likely to make financial investments (http://publications.unidosus.org/handle/123456789/1123).</p> <p>Encouraging eligible lawful permanent residents to naturalize has a positive impact on their individual earnings and on their investment into our economy. Holding LPRs back from the naturalization process denies this opportunity for individual and shared prosperity. Collective economic benefit should not be blocked by this punitive measure to make it more difficult to apply for naturalization. For this reason, I oppose the DHS proposal to change the fee waiver process.</p>

ID	Comment.	Commentor	Comment
268	USCIS-2010-0008-0428	Sendy Lamour	<p>Dear USCIS,</p> <p>America the great is the land of the free and the home of the braves. Immigrants believe this and thats why we are here. When you give us, immigrants, the resources and opportunities we need, we use it for good and we only add to the greatness of America. Becoming a citizen is not financially affordable for all immigrants. I am now a college graduate with a Bachelor of Science in Biology. My citizenship allowed me to apply for scholarships that I wouldnt be qualified for otherwise. Please stand by the devise of this great country. We believe in the opportunities that this country has to offer and this is why I and so many others are here! You only help us become better citizens when you give us a hand.</p> <p>Thank you.</p>
276	USCIS-2010-0008-0441	Carol Egan- Davis	<p>The United States should not create rules that allow only wealthy immigrants to file for asylum and/or legal permanent residence. Changing the fee waiver exemption rule would prohibit many eligible immigrants, refugees, and asylum seekers from filing for legal permanent residences and asylum. Many of our immigrant brothers and sisters are working at jobs that do not pay enough for the extras, but they are working. Are country is a country of immigrants and refugees who are seeking a better, safer way of life that offers opportunities to improve one's situation in life. This is what makes America great. This should not change, but this proposed rule change would indeed change that.</p>

ID	Comment.	Commentor	Comment
279	USCIS-2010-0008-0430	Daniel Hong	I strongly oppose the Fee Waiver rule because this violent, White supremacist empire of a country has the audacity and hypocrisy to restrict today's poor immigrants from naturalizing when the officials in charge of DHS and USCIS are descendants of families who came to the US. with nothing. The Fee Waiver rule is trying to represent a "final solution" to a vicious, colonialist cycle this country perpetuates -- that the US. violently intervenes and destabilizes countries around the world, causes waves of migration to the US. so to provide cheap labor for US. corporations, and then tries to deport and disappear these communities once they're no longer needed.
289	USCIS-2010-0008-0449	Hailey Scandrette	I am writing to voice my strong opposition to the proposed revision which would eliminate receipt of means-tested benefits as a basis for qualifying for a fee waiver in citizenship and green card applications. Individuals attempting to become legal residents and citizens should not be discriminated against based on income or need for benefits.
290	USCIS-2010-0008-0433	Rocio Nunez Pepen	I strongly oppose the changes to the waiver system currently in place because as a naturalized immigrant myself, I was fortunate enough to receive the waiver and gain the voting rights that I yearned. As a low-income, first-gen college student paying tuition, this fee would've been a huge burden thus preventing me from gaining access to be Naturalized. I can see how fees are a barrier first hand but for parents and other low-income people, these fees could keep them away from their dream of getting the right to vote.

ID	Comment.	Commentor	Comment
292	USCIS-2010-0008-0442	Mary September	<p>I'm commenting on behalf of my husband who is a legal permanent resident. He arrived in this country in August 2015, after a 12-1/2 year battle with USCIS, including a 4-year separation.</p> <p>"My name is Patrick September. I'm 66 years old and I don't have a job. If the current fee waiver policy had not been available when I applied for citizenship in August 2018, I would not have been able to afford to apply for citizenship. Because of the current policy, I was able to file my application for citizenship and ensure that my family will never be forced to live apart again.</p> <p>If this proposed policy goes into effect, I would not have been able to afford to become a U.S. citizen. I have a 12 year old U.S. citizen son and my wife, a U.S. citizen, cannot return to Africa because she has contracted malaria many times. If she returns, she will succumb to malaria when the annual rainy season comes.</p> <p>Please don't change the fee waiver policy. It will hurt many families like mine.</p> <p>Respectfully, Patrick September"</p>
297	USCIS-2010-0008-0447	Jason Kasso	<p>These new regulations would not improve or expedite the process. These are barriers put in place to prevent the most deserving and devoted of us from becoming the full citizens they desire to be. Almost every family of the United States started as a struggling immigrant in one capacity or another. We cannot allow more barriers to be put in place to prevent these hardworking individuals from becoming full citizens.</p>

ID	Comment.	Commentor	Comment
302	USCIS-2010-0008-0444	Messalina Gonlaves	I oppose this measure because it is not fair and it constitutes another barrier to citizenship. I know a few people who are not applying for citizenship because of the fee and putting food on the table they chose not to apply. Citizenship is a dream come true to every immigrant so they should be able to get assistance with the fee if they cannot afford it.t
304	USCIS-2010-0008-0457	Lisa Levy	I am opposed to any changes to the waiver system for immigrants who can't afford the filing fees. This seems like just another road block to make it more difficult for people to become citizens. The process is difficult enough as is, especially for people of meager means who quite often are elderly and from humble backgrounds.
306	USCIS-2010-0008-0465	Mary Grace Gauto	I believe that moving forward with this change will make the path to legal citizenship further inaccessible for low income populations that fled their countries in a need for safety. I don't support making legal pathways harder, we recognize immigrants value in our communities, yet this sends the message that we only recognize the value of those who can pay.
309	USCIS-2010-0008-0466	Dyer VanDevere	Mainatianihg fairbaccess to US citizenship is important to me and most people I know. By changing the regulations, people will be priced out or face undue hardship. Allowing people he opportunity to live in the US should not be dictated by their wealth or income. Thank you. (Apologies for misspelling, this was typed on my mobile device)
311	USCIS-2010-0008-0474	Albert Hong	As a child of immigrants and as a pastor in a neighborhood that has a large immigrant population, I oppose this effort to make legal immigration even harder for other members of our human family.

ID	Comment.	Commentor	Comment
314	USCIS-2010-0008-0472	Paul Spagnoli	I strongly oppose the proposed change in regulations, which is clearly an attempt to limit citizenship applications from people who are not well off. My own ancestors arrived in this country and became citizens before the mid-1920s, when draconian restrictions on immigration were instituted, so I was very happy when immigration restrictions were loosened again in the mid-1960s. My ancestors were poor when they arrived but they prospered in this country. I would like to see the USA maintain its tradition of welcoming the "huddled masses" of the world so that others may have the same opportunities that my ancestors benefited from.
315	USCIS-2010-0008-0464	Osman Harb	I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not discriminate against those with low incomes by eliminating current verification methods and making it prohibitively difficult for those most in need to receive a fee waiver for their citizenship application.
317	USCIS-2010-0008-0475	Akanksha Jayanthi	This change will make it harder for the most vulnerable in our immigrant communities to become citizens. It is cruel and perpetuates the myth of meritocracy by only permitting people of a certain financial standing to advance and make a life for themselves here. This country is made better because of immigrants, and this change will be detrimental.

ID	Comment.	Commentor	Comment
321	USCIS-2010-0008-0456	Elizabeth Diniakos on behalf of the MICOP Immigration Legal Assistance	<p>I am writing on behalf of the MICOP Immigration Legal Assistance in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>In Ventura County, 20,000 indigenous Oaxacan people from southern Mexico live and work. They are the folks who pick our food. The minimum wage that they receive for their backbreaking work is carefully strained in order to just get by in terms of the high cost of living here. When they can save, they are keeping aside a little at a time in order to some day file the documents to become citizens in the U.S.</p> <p>Language barriers often are their downfall, and they become frequent victims to predatory businesses. As a defense to this, MICOP Immigration Legal Assistance offers low or no cost immigration legal assistance. Our clients still find the cost to file very, very difficult.</p> <p>A recent client who has a middle age son with down's syndrome wants to assist his son with obtaining legal status. He had filed the I130, over 10 years ago, but the notario took all of his money and never filed the rest of the documentation, including the I485. While this form does not permit a waiver, all fee waivers help client's like mine to not wonder how to pay the fees for gaining legal status.</p> <p>Denying fee waivers demonstrates that citizenship is only for the rich. It ignores the important people who by their own hard work feed us daily.</p>
328	USCIS-2010-0008-0453	Sherri Stuver	<p>It is unconscionable and un-American that individuals who may legitimately apply for US citizenship would be precluded from such simply because they cannot afford the fee. Our great nation has been built upon the tremendous contributions and service provided by immigrants. It grieves me that we would erect unfair barriers to their pursuit of becoming citizens.</p>

ID	Comment.	Commentor	Comment
331	USCIS-2010-0008-0469	Julia Elting	Please keep the regulations to become a citizen the same. I'm the daughter of an immigrant and had my mom not been able to become a citizen to make a better life for my siblings and I, I'm not sure what my life would be like now. Immigrants are people and they deserve to be able to stay here and become citizens if they want to.
333	USCIS-2010-0008-0451	Marilynn Johnson	This rule is a terrible idea. I volunteer with citizenship applicants, and these new requirements will make a difficult process even more burdensome, both for the applicants and USCIS. Securing the additional paperwork will be time consuming and difficult for many. The last thing we should be doing is discouraging those who want to become American citizens from doing so. In my experience, these applicants are hardworking people who want to do the right thing for themselves and their children--lets not create unnecessary obstacles that will hamper rather than facilitate the process.
334	USCIS-2010-0008-0482	Ellie Frischmann	I oppose the proposed revision because this will make it impossible for immigrants with the lowest incomes to receive the fee waiver. These individuals rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.
335	USCIS-2010-0008-0479	Andrew Wade	I am writing to voice my strong opposition to the proposed revision which would eliminate receipt of means-tested benefits as a basis for qualifying for a fee waiver in citizenship and green card applications. Individuals attempting to become legal residents and citizens should not be discriminated against based on their need for benefits.
336	USCIS-2010-0008-0478	Laura Kirk	Save the fee waiver! I oppose this change. It is already hard to find affordable legal advice and apply. Making it more expensive with just continue to discourage eligible folks from applying. The application process should be as accessible as possible for people who are eligible.

ID	Comment.	Commentor	Comment
340	USCIS-2010-0008-0512	Nora Kane	I am against the proposed new regulation of abolish the Fee Waiver. The american citizenship should be an issue about commitment and allegiance to the United States and not about having a certain income. Everybody showing allegiance to this country should be able to become a U.S. citizen! The application for citizenship, the document N-400, doesn't ask in any point about income, so if this isn't a matter in this document, it shouldn't be an obstacle in the path to citizenship!
342	USCIS-2010-0008-0501	Toni Cross	Some people leave everything behind, through no fault of their own, when they come to the United States. They arrive impoverished, but do not remain so. I, myself, have friends who fled El Salvador who have been working, contributing taxpayers in the US for 20 years. Why not give these potential citizens a chance to reach their working potential and contribute to the tax base? Making it harder to get the fee waiver is bad public policy and shows short term thinking.

ID	Comment.	Commentor	Comment
343	USCIS-2010-0008-0492	Sheryl Munoz-Bergman	<p>I am opposed to the changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. Many of my neighbors and friends cannot afford the \$725 naturalization application fee due to their limited or fixed incomes, yet they do not reach the threshold for the 150%FPL fee waiver option.</p> <p>The United States is a nation of immigrants. My grandmother immigrated to this country a century ago, and she received help from her new neighbors to integrate into U.S. society. I like to pay that forward by helping my neighbors in similar situations today.</p> <p>Our whole community benefits when immigrants are able to naturalize. While I understand that USCIS relies on fee income to provide services, I also understand that Congress intent in approving the fee waiver option is to allow low income applicants an opportunity to apply for citizenship and other benefits. Receipt of public benefits should continue to be one way that applicants can demonstrate eligibility for the fee waiver.</p> <p>Receipt of a means-tested benefit is the most direct method of proving inability to pay USCIS fees, because it leverages analysis that other government agencies have already completed of individuals income and other relevant circumstances. Forcing fee waiver adjudications to instead consider extensive original documentation of the many factors that determine income or hardship will hinder applicants and slow USCISs decision-making process, exacerbating the already-sizable backlogs of applications. Requiring submission of a Form I-912 and supporting documentation from every applicant even those applying simultaneously with identically-situated family members will have the same negative effects.</p> <p>Streamlining and modernizing the immigration services application process is a laudable goal, but this proposed change contravenes it. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCISs proposal would make that process more complicated, expensive, and paperwork-heavy in direct derogation of the agencies stated intention to simplify adjudications.</p> <p>I strongly urge you to maintain the current fee waiver application process and the guidelines set forth in Policy Memorandum PM-602-0011.1.</p>

ID	Comment.	Commentor	Comment
349	USCIS-2010-0008-0503	Dr. Joan Quinonez	<p>I am objecting to the proposed changes in the Fee Waiver process. My husband applied for citizenship in 2016 after over 20 years as a permanent resident and as a husband of a natural citizen for many years.</p> <p>Even for us the fee at the time was a factor in delaying his decision to apply for citizenship - and we are both employed professionals with upper income levels.</p> <p>For low income residents the current fee would be extremely difficult to save for and the Fee Waiver form should remain as simple and straight forward as possible.</p> <p>Citizenship is an important way to integrate immigrants into our communities, allow for participation in the foundation of our country such as voting, jury duty and other rights.</p>
363	USCIS-2010-0008-0491	Jeff Xiao	Will make many immigrants unable to apply for naturalization!
365	USCIS-2010-0008-0487	Liana Baindurashvili	I oppose this proposal! Its already hard for people who are in poverty with limited resources, this will make it extremely difficult for eligible clients to obtain legal statues. We also have to think about folks who are elderly and do not work and cannot work due to illness. Why are we creating more barriers for them? Anything to do with legal issues is difficult enough and very costly. This will be a huge impact on a lot people who fled their countries to start over! Its difficult enough to leave a place you have grown up in, to come to a new place with a new language, new norms, and new culture and adapt.

ID	Comment.	Commentor	Comment
367	USCIS-2010-0008-0490	Gretchen Wronka	This is one more example of a tedious bureaucratic ploy to make the path to citizenship more difficult for hard working people who are contributing to our country. I'm bringing this to the attention of my newly elected Congressman, Dean Phillips, Minnesota Congressional District 3. I've also put in calls regarding my concerns to MN Senators Amy Klobuchar and Tina Smith. Gretchen Wronka
381	USCIS-2010-0008-0518	Alexandra Markiewicz	I oppose this rule. As the daughter of an immigrant, I tsee how it is vital to the prosperity and development of our country that people have the opportunity to become citizens with as few barriers as possible.
382	USCIS-2010-0008-0520	Deirdre Godfrey	<p>I strongly oppose the proposed change in the fee waiver requirements for low-income immigrants and refugees who wish to become U.S. citizens. It violates the promise of America that there is a wealth barrier to citizenship, and that in order to avoid being stopped by that barrier applicants may face paperwork requirements that they cannot meet.</p> <p>I have spent most of the last 40 years working for and with low-income people, many of them immigrants and refugees, including supporting organizing for farm workers, teaching English to newly arrived refugee adults, managing low-income housing and recovery housing, and teaching ESOL in a low-income urban district. I have known refugees from Vietnam, Iraq, Haiti, Somalia and Bosnia, in particular, who exemplify the American dream. Their values are ours: hard work, family, education, community. It is absolutely disheartening to witness how the U.S., never easy to enter, is now adding barriers. These kinds of walls we do not need! These kinds of citizens we do need!</p>
393	USCIS-2010-0008-0577	Phuong Nguyen	I strongly oppose the proposed changes for fee waiver eligibility as it is not only costly to certain subsets of qualifying applicants but it also discourages other potential applicants from applying.

ID	Comment.	Commentor	Comment
402	USCIS-2010-0008-0570	Karin Guros	I strongly oppose the proposed changes to the fee waiver process. The USCIS proposal would make it more difficult for low-income immigrants to apply for immigration benefits. These revisions would put an unfair burden on people within my community who otherwise would be eligible for a waiver for citizenship fees. For this reason I oppose this rule change.
414	USCIS-2010-0008-0591	Sinh Nguyen	I oppose the fee waiver eligibility changes as it obstructs the path to citizenship for many qualifying applicants who simply cannot afford the application fee! Please reconsider.
427	USCIS-2010-0008-0575	Prakash Shrestha	most of the people applying for fee waiver are low income people. if you take away fee waiver from them they might not be able to apply for their citizenship or delay their process.
441	USCIS-2010-0008-0563	Sunil Bajagain	I will oppose change in fee waiver rule change that been proposed because this will directly affect ability low income immigrants to get the immigration benefits such as adjustment of status, ability to become US citizen.
447	USCIS-2010-0008-0571	Tagoipah Mathno	This is unlawful and racist towards the immigrant and refugee community. It was not thought from the perspective of the community it is directed towards. It is an attacked on non-citizens
457	USCIS-2010-0008-0562	Tsegaba Woldehaimanot	Please dont allow this rule to go into effect. Its going to affect the lives of so many people, especially low income individuals. Becoming a citizen is one of the most amazing feelings which leave individuals feeling so proud to call themselves American. The fee waiver removes a huge barrier for people who may not otherwise have had a chance to become a citizen. Please do not make it harder for people to become a citizen. Many wait years for that moment and this rule may make it impossible for this day to ever come.

ID	Comment.	Commentor	Comment
459	USCIS-2010-0008-0611	Andrew Huntington	I oppose the changes to the low income fee waiver process. We need to stand up for our low income immigrant friends!! Let allow poor people to become part of our country and to keep more money in their pocket. Lets be a country that works to keep families together! Thank you for your time. I oppose these changes!
470	USCIS-2010-0008-0658	Robert G	My hope is that this Rule DOES NOT pass. As a service provider that has spent my life career working as an ally with low income families, this rule would create yet another barrier for those families to gain citizenship. I would like to believe the United States is better then passing this ruling. Please consider the impact a ruling such as this will have on those that need these waivers.
479	USCIS-2010-0008-0652	Sam Him	<p>Please Keep the Path to Citizenship Open or Intact by keeping the fee waive policy to the way it is now. Otherwise, it will hurt vulnerable low-income immigrants, refugees, asylee, low income and other populations that would like to become a US Citizen and to be a productive citizen of this great nation. They have encountered many difficulties including language, culture, finance, and other US systems day to day.</p> <p>Please DO NOT DO HARM TO THEM, Instead, BY HELPING TO MAKE THINGS EASIER FOR THEM TO BECOME A US CITIZEN. The US needs them and they need the US, so we can continue to make this great nation as an ideal country that the rest of the world would look up to or set a great example for all.</p>
507	USCIS-2010-0008-0620	Marc Brenman	I oppose the proposed changes to fee waiver regulations. The federal government should not raise additional barriers to entry for low income people.

ID	Comment.	Commentor	Comment
510	USCIS-2010-0008-0655	Enoka Herat	I am writing to reject the changes to the fee waiver program. It is important for people to become citizens so that they can fully contribute to our society and come completely out of the shadows. We should be making it easier for people to become citizens, not more challenging. Also, studies consistently show that immigrants contribute more than they take from our economy. Fee waivers enable more people to naturalize and contribute more fully to our society. Please do not make these changes to this rule.
538	USCIS-2010-0008-0719	Susan Donaldson	The proposed changes are vastly unfair, as many (perhaps most) persons hoping to attain citizenship simply won't have the available money to do so. Money should have no role in such an important matter as identity.
543	USCIS-2010-0008-0677	Ann Reid	Why make it more difficult for hard working, legal immigrants to become citizens? Either lower the \$725 fee required to an affordable amount, say \$100, or don't make the proposed change. I see this as just another sneaky way to prevent people from coming to the US and then becoming citizens. Shame on you.
546	USCIS-2010-0008-0724	Anne Fitzpatrick	Please do not make changes to the current regulations concerning subsidizing fees for citizenship. This would create an unfair burden for low income people who wish to be citizens

ID	Comment.	Commentor	Comment
549	USCIS-2010-0008-0708	Plover Brown	There is no goodness in a proposed change that will only hurt, and only hurt the most vulnerable of us in specific. A family barely making do is already experiencing stress like many people in our country cannot fathom. Most all are working, making minimum wage and struggling to support their families. Throwing extra roadblocks in their way is a morally corrupt way of cutting corners in the budget. If you want people to be able to pay, make sure their minimum wage is a living wage, so they have enough money. It's pretty central to our country's myth of meritocracy that if you work hard you should be able to succeed. You don't have science behind you if you believe that the poor don't work hard. So the choice to make life even harder for these families is clearly against our country's values.
551	USCIS-2010-0008-0694	Deborrah Gouin Chapman	This is yet another attempt by a bigoted republican regime to force out immigrants from Central and South America, the Caribbean and Africa. We should be making the path to citizenship easy and affordable, not throwing roadblocks in the paths of good, decent people looking to improve their lot in life. Another shame upon this evil regime
592	USCIS-2010-0008-0903	Alan Iser	I am writing to oppose the proposed revisions for fee waivers , formI-912. Given the many possible immigration applications there are, the proposed rule changes will put low income applicants at a great disadvantage. Fees can be very expensive, for example a green card application is \$1,140. Many fewer low income people will be able to stay in our country or become citizens. As a child of immigrants of modest means, these proposed changes resonate with me on a very personal level.Fewer people will be able to become citizens of our great country.

ID	Comment.	Commentor	Comment
597	USCIS-2010-0008-0892	Faye D-W	The people who need the help of the United States are of all creeds, genders, races, ages, etc. no matter whether they are well-off economically or in desperate need. It is not right that we discriminate on the basis of their ability to afford the fees. Think of the numerous people who entered this country with only the shirts on their backs and yet they became successful, patriotic citizens. They were entrepreneurs, skilled workers, hard workers and filled many jobs that others would not do. They managed to send their children to college and leave a legacy for generations to come. We should accept those who want and need a new life.
603	USCIS-2010-0008-0944	Maya Gillett	This fee makes citizenship (or access to the process of naturalization) a commodity that only people with access to financial resources are able to acquire. This is fundamentally un-American!! So many of the people who have historically immigrated to this country have come looking for better opportunities for themselves and their loved ones - wouldn't whatever money they might have saved be better spent on supporting themselves and their families in establishing a new life here, rather than overcoming this costly and unnecessary barrier?
648	USCIS-2010-0008-0806	Oneida Arnold	I am opposed to the change in the requirement to the fee waiver process. It is wrong to punish people already in vulnerable economic situations by eliminating current verification procedures, making it more difficult for them to obtain a fee waiver for their citizenship application.
666	USCIS-2010-0008-0896	Deborah Trefry	Please don't make it even more difficult to legally become a citizen. This nation wouldn't be what it is without the diversity that everyone brings.

ID	Comment.	Commentor	Comment
679	USCIS-2010-0008-0976	Rima Meroueh	The fee waiver request is absolutely unnecessary and limits the power of the United States. Immigrants who came here with nothing are the ones who drive the economy over the top. Immigrants who came for a better future contribute to this country in a number of ways. They push scientific and social research to a higher level, which then leads others to want to come to the U.S. to do the same. If you remove this students who cannot afford the application will go elsewhere. Additionally, study after study has shown that immigrants do not take jobs from U.S. Citizens. In fact immigrants complement U.S. citizen workers, by taking the jobs that they do not take. Removing the fee waiver would be a huge mistake, and would be to the detriment of many the United States and all its citizens.
691	USCIS-2010-0008-0909	Lawrence Von Bargaen	I strongly oppose the proposed changes to the N400 filing fee. My grandfather came from Germany with nothing except a desire to work hard and make a contribution to his new community. We value immigrants for the energy, patriotism, hard work they give. Don't make it harder for them!
738	USCIS-2010-0008-0797	Theresa Hofmann	The USCIS should reject this proposal. I believe that by enacting this proposal, the USCIS would be punishing people simply for being poor. It would not achieve any legitimate government interest such as fiscal responsibility. The immigration process is already needlessly complicated to no benefit. This would require more time for the already overworked immigration lawyers, immigration candidates, and USCIS employees. This plainly looks like an attempt to simply reduce the number of people applying for legal status. It would not reduce the number of immigrants.
746	USCIS-2010-0008-0913	Jane King	I have many patients with green cards who are unable to apply for citizenship because they can't afford it. Money should be such a barrier in obtaining the right to vote, to more fully participate in the country where one resides.

ID	Comment.	Commentor	Comment
749	USCIS-2010-0008-0808	Sandra Mangual	<p>Dear Sir/Madam</p> <p>I am commenting in support of keeping the free waiver for applicants during citizenship application process. This population faces multiple burdens and challenges, for the most part live in poverty and precarious social conditions. To eliminate the opportunity to get a free waiver during the most important phase in their lives, is to take away a dream to successfully join the American family, in this great nation.</p> <p>I am writing in support to keep the free waiver alive.</p> <p>Dr. Sandra Mangual Boston</p>

ID	Comment.	Commentor	Comment
751	USCIS-2010-0008-0974	Samantha Hurst, PhD	<p>This proposal - a reversal of the Obama administration's policy to waive fees for citizenship and other applicants who could not afford the expensive application fees - is outlandish.</p> <p>To remove the use of public benefits such as the partial or full fee waiver (if they cannot afford the \$725) would totally deny the dream of citizenship for elderly and working poor immigrants who are unable to pay because they cannot legitimately afford it.</p> <p>I am totally against the new proposed policy of the Trump administration. These actions create yet another immoral barricade against innocent people who are fleeing to our borders to save their lives and the lives of their family.</p> <p>Since the beginning of our history as the United States of America, we have welcomed immigrants and included immigrants in the fabric of our country. It is against our national values to discriminate against anyone based on their race, ethnicity, national origin, gender, religion, and their socio-economic status. Thousands of immigrants have obtained lawful permanent residency and now have the opportunity to apply for citizenship, as envisioned by the nation's founders and created by the Constitution and federal law.</p>
767	USCIS-2010-0008-1158	Amanda Locke	<p>Do not make the Fee Waiver inaccessible to more people. The immigration process is already extremely challenging to navigate. When we disallow people access to the immigration process we are trapping people in poverty and make them vulnerable to exploitation and abuse like human trafficking, wage theft and homelessness. Please do what is humane and don't charge people who are trying to do everything they are supposed to in order to create a better life for themselves and their families.</p>

ID	Comment.	Commentor	Comment
770	USCIS-2010-0008-1127	Flora Ghansedegh	This is expensive and complicated process. As a volunteer who helps people through the process of applying for citizenship, I see how intimidating this fee already is for working people. I oppose anything that effectively prevents poorer or working immigrants from becoming citizens. My own relatives had barely two nickels to their names when they came from Germany and Ireland, but they were able to become citizens and work their way out of poverty, and everyone I have helped to get citizenship is capable of doing the same at great economic benefit to our country.
780	USCIS-2010-0008-1140	Marila Carillo	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
795	USCIS-2010-0008-1129	Dorothy Atewologun	The change to the fee waiver program will place an undue burden on hard working people who are trying to become American citizens. While they work hard they may still be low income and are just as deserving of the opportunity to get American citizenship.
798	USCIS-2010-0008-1141	Priscila Solis	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
807	USCIS-2010-0008-0875	Silvio Aleixo	I don not agree about this law. It is going to make very difficult for people to apply for citzien ship.
809	USCIS-2010-0008-0843	Linh Tran	That isn't fair for the low-income people and people that want to be come a citizen.
864	USCIS-2010-0008-0902	USCIS-2010-0008-0902	The proposed fee waiver regulation is continuing a dangerous path towards denying hundred and thousands of amazing people from obtaining citizenship in this country. If someone wants to be a part of this country and call it their home, why are we creating obstacles after obstacles. Not only the wealthy or young deserve this opportunity, as we will be pleasantly surprised with the perseverance and power of all immigrants who wish to apply for citizenship. Denying them this opportunity is denying America the possibility of greatness, and its going that the current goal.Thank you

ID	Comment.	Commentor	Comment
872	USCIS-2010-0008-0736	Jacqueline Raine	It is extremely important that immigrants who live in the United States vote and become part of the democratic process. The way to vote is to become a US citizen. If people are excluded from applying for Naturalization based on their income then thousands of people will be cut from being able to vote and participate in our country's voting process. This is wrong.
881	USCIS-2010-0008-0786	Natalia Kolesnik	This change to the fee waiver eligibility process is bad idea because it will result in fewer green card holders becoming US Citizen; it will hurt American people. Naturalized citizens usually earn more than LPRs and are more likely to find a job. During preparation to naturalize JPRs learn English, The US history, etc. After naturalization citizens are more engaged in their communities and can vote. So, it is bad for all of us when LPRs cannot afford to become citizens. Lets not make it more complicated and less affordable!
882	USCIS-2010-0008-0787	Jimena Mohedas	This policy is fundamentally discriminatory towards low-income immigrants. It is being adopted only to discourage applications and to create yet another barrier to citizenship. This administration is hell bent on making the lives of immigrants a living hell, and this is another example of that. I vehemently oppose this policy.
884	USCIS-2010-0008-0790	Janice Sharar	These policy changes are inappropriate in a country made strong and free by immigrants and migrants seeking asylum. This administration is wrong on this matter and many other related matters. We need comprehensive immigration reform.

ID	Comment.	Commentor	Comment
894	USCIS-2010-0008-0826	Kimberly Mowrey	<p>To Whom It May Concern:</p> <p>I am opposed to the proposed fee waiver changes that will make becoming a citizen more difficult to deserving residents of the US. Please consider the growth and opportunity that benefits us all when we grow as a nation.</p> <p>Regards,</p> <p>Kimberly Mowrey</p>
896	USCIS-2010-0008-0834	Rachel Phillips	Access to benefits should not be restricted or denied in any way. This creates a dangerous situation and would not actually benefit USCIS as all.
910	USCIS-2010-0008-0914	Savanna Stern	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
912	USCIS-2010-0008-0920	Koang Kerjiok	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
965	USCIS-2010-0008-1045	Chung Ki Yi	I oppose the Fee Waiver Action,because it is to make difficult for people apply for citizenship.Some immigrants already struggle with finances to receive help.
981	USCIS-2010-0008-1069	John Dugan	<p>Please keep the path to citizenship open. This rule change would make it much harder for many low-income immigrants to get their fees waived for citizenship/green card/work permit applications. This discriminates against people that receive means tested benefits and cannot afford the fees for the applications. Our country was built by millions of immigrants who often came from little or nothing and made a better life for themselves here. Please say no to this rules change. America must be a beacon of hope to all people, not just those that can pay a fee.</p>

ID	Comment.	Commentor	Comment
1006	USCIS-2010-0008-1103	Katrina Herzog	I strongly oppose the proposed reduction of fee waivers for low-income immigrants and their families. This policy change will make most of those who apply for the fee waiver no longer eligible to do so, which will force them to forego important immigration protections like asylum, due to the prohibitively expensive cost of filing the required paperwork. The policy proposal is a sneaky method of limiting family immigration and reunification and it could suppress naturalization rates among immigrants, negatively impacting our communities and putting people in danger.
1008	USCIS-2010-0008-1105	Julieta Larsen	I think this is a violation of civil rights, terrible for our families and communities in New York.
1009	USCIS-2010-0008-1106	Rosselyn Meija	If what Trump wants goes though, it would hurt immigrants who are unemployed, underemployed, disabled, or retired.
1012	USCIS-2010-0008-1112	Carolyn Draper	<p>I urge you to not change the requirements for the citizenship fee waiver. Everyone should be able to apply for citizenship, regardless of income. Study after study has shown that immigrants contribute positively to the US economy. We are in fact hurting ourselves if we make it harder to apply for citizenship.</p> <p>I have personally witnessed a citizenship ceremony and it's a beautiful thing to see how proud everyone is. This rule change would result in fewer applications for citizenship, ultimately hurting our economy.</p>
1020	USCIS-2010-0008-1126	Odalís Flores	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1021	USCIS-2010-0008-1128	Maria Cortes	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1022	USCIS-2010-0008-1130	Jorge Rabaton	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment

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1025	USCIS-2010-0008-1136	Adrian Menchaca	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1028	USCIS-2010-0008-1139	Edgar Ali Lazcano Romano	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1029	USCIS-2010-0008-1142	Maria Gonzalez	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1030	USCIS-2010-0008-1143	Grace Sorensen	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1034	USCIS-2010-0008-1149	Lana Bostic	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1040	USCIS-2010-0008-1156	Julie Penning, Queen of the Valley Medical Center	Please do not change the fee waiver rules. It is to everyone in the United States' advantage to help immigrants afford to apply for citizenship. They are doing the right thing by applying for citizenship, and should not suffer because of financial constraints. The more successful the least fortunate are, the better we all are.
1067	USCIS-2010-0008-1187	Christopher Lovings	The country of the United States was founded by immigrants - it is sad that this proposal is trying to increase the difficulty for those that want to come to this country to pursue their dreams. I am vehemently oppose this proposal to make the road harder for those that are trying to change their status in this country.

ID	Comment.	Commentor	Comment
1079	USCIS-2010-0008-1198	Merlin Simpson	<p>For centuries, for decades, immigrants have been coming to our country, bringing their dreams and energies that have fundamentally built the country that we are now. With the exception of those who were already here -- native Americans -- ALL of us are the product of immigration. Along the way hundreds of thousands needed the support of community to gain their footing and turn their dreams into realities and, among them, luminaries that could never have been predicted when they arrived. They together with their predecessors built what this country is today --- that still needs the infusion of those with 21st century dreams and ambitions who have more recently entered the country. They benefit us as a country in the long run, and time determines how much they, as their predecessors, will contribute to the good of our nation by their creativity, energy and perseverance -- which is what their predecessors did and continue to do.</p> <p>The information collection activities and policies threaten the ideals and foundations of this nation. They interrupt the process of assimilating, revitalizing our communities and country as a whole. Documented immigrants are already being threatened by those misguided policies, hesitant to utilize services which they deserve at the risk of being deported despite the steps they have undertaken to become citizens. Immigrants and refugees at the southern border, unfairly disparaged, fleeing the threats to their lives by gangs and governments where they were born, as well as those entering the country elsewhere, are threatened by these information collection activities. These people seeking a better future in which they can contribute to our continued well-being throughout the country don't need to be threatened by our insecurities and misguided government policies. They don't deserve such policies and procedures; they fly in the face of our Constitution. They are antithetical to our ideals as a country and our ideals -- they do nothing constructive to enhance our country, our collective future and our American culture.</p>
1081	USCIS-2010-0008-1201	Fiona Murray	<p>This proposed rule change would provide a significant barrier for low-income individuals to submit applications to become citizens. Low-income immigrants provide no less value to the country than higher-income immigrants and it is highly unethical to create barriers them working hard to become citizens. If someone wants to become a citizen, who are we to tell them they cannot if they are poor?</p>

ID	Comment.	Commentor	Comment
1083	USCIS-2010-0008-1203	Anonymous	I do not agree with this new regulation, I think that it is classist because it requires individuals to pay so much money, even though the majority of American citizens are only 2 pay checks away from eviction and homelessness. So how do we expect families coming into the USA to pay this much? It also doesn't account for individuals who may not be able to easily access computers.
1120	USCIS-2010-0008-1240	Sofia Estevez	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1125	USCIS-2010-0008-1111	Kate Keller	I strongly discourage the proposed changes to the fee waiver requirement for immigrants. Taking away this criterion will make it harder for vulnerable and low-income immigrants to become U.S. citizens.

ID	Comment.	Commentor	Comment
1143	USCIS-2010-0008-0544	Ellen Dumesnil on behalf of the International Institute of the Bay Area (IIBA)	<p>Comment part 3: The proposed changes will hurt the United States as a whole by reducing the amount of individuals naturalizing and obtaining immigration relief. Immigration and naturalization is vital to the fabric of the United States. According to a 2012 Migration Policy Institute Study, naturalized citizens earn up to 70 percent more than noncitizens, have more job opportunities, and are less likely to live below the poverty line.</p> <p>Naturalization results in large gains for the U.S. economy. A 2012 Center for the Study of Immigrant Integration (CSII) at the University of Southern California found that if the 8.8 million LPRs eligible to naturalize did so, U.S. GDP would increase by \$37 to \$52 billion over a ten-year time period. Hence, naturalization not only positively impacts the individual naturalizing but also the country and Americans as a whole.</p> <p>Thus, by making it harder for individuals to cover the large cost of applying for naturalization, as well as other immigration benefits, all Americans are impacted negatively.</p> <p>Fee waivers help low-income immigrants as they build their lives in the United States.</p> <p>This country has been a beacon for those fleeing persecution and poverty and for those who still believe in the American Dream. I have witnessed and been inspired by the hard work it takes to earn citizenship. The immigrants we work with are testimony to the promise of this country. Their desire to be an integral part of our society by gaining citizenship is testimony to what others see in us as a nation. To act to deny them that opportunity goes against one of the most important values this country has ever stood for: equality for all.</p> <p>IIBA calls on these proposed changes to be withdrawn immediately.</p> <p>Sincerely, Ellen Dumesnil IIBA Executive Director</p>

ID	Comment.	Commentor	Comment
1165	USCIS-2010-0008-0941	Kham Moua, Southeast Asia Resource Action Center	<p>Comment part 2: Southeast Asian Americans are Refugees who want to Naturalize</p> <p>SEAAAs are the largest refugee population ever resettled in the United States, with over one million individuals resettled from Laos, Cambodia and Vietnam due to the US-backed war in Southeast Asia over 40 year ago. Today, SEAAAs total nearly 2.8 million across the nation and 2 3 are active, integral members of our society, particularly in often economically stagnant localities</p> <p>Naturalization is critical for many SEAA lawful permanent residents to fully integrate and engage in the United States. Citizenship is also necessary for many of these individuals to claim entitlements they currently or previously work towards, such as social security. As such, many SEAAAs have naturalized. According to the 2013 Census, approximately 68% of Cambodians, 69% of Lao, 74% of Vietnamese, and 70% of Hmong Americans born abroad have naturalized compared to only 46% of immigrants overall. However, a sizable portion of these 4 communities have yet to naturalize due to other barriers, including but not limited to 5 income and language ability.</p>

ID	Comment.	Commentor	Comment
1179	USCIS-2010-0008-0906	Rebecca Schaeffer, Church World Service	<p>Comment part 4: The Proposal Will Prevent Qualified Legal Permanent Residents from Naturalizing</p> <p>USCIS's proposal contravenes the best interest of our nation. New fee waiver procedures would hurt all Americans by dissuading qualified, valuable individuals from applying for citizenship and other critical benefits.</p> <p>The high expense deters naturalization. Members of Congress and our organizations support flexibility on fees because the steep cost of applying for citizenship is the primary barrier to naturalization. Surveys show that most LPRs want to become U.S. citizens. In the 2012 study by Pew Hispanic Center, for instance, 93 percent of Latino immigrants aspired to naturalize. However, many of them say that the cost of naturalizing has stopped them. A study published in 2018 by Stanford University's Immigration Policy Lab confirmed this phenomenon. Researchers offered naturalization fee scholarships to interested LPRs, and found that when they removed the fee as a barrier, applicants rate of naturalization doubled.</p> <p>The added complexity would be another deterrent. By complicating the fee waiver process, USCIS would push naturalization out of the reach of a great many applicants, whose U.S. citizenship would have increased their civic and financial contributions to their communities. Many LPRs would forego the difficulty and expense of pursuing naturalization, since they already enjoy indefinite permission to live and work in the United States. A further deterrence is the greater uncertainty from the proposed change. Receipt of a means-tested benefit is reliably competent evidence of qualification for a fee waiver, whereas adjudicators' evaluation of income and financial hardship would be more subjective, and the results less predictable. Fewer LPRs would begin a more effort-intensive process that promised less assurance of success.</p> <p>This proposal would also likely weaken the ability of hard-working immigrants and Americans to maintain their employment and self-sufficiency. USCIS can grant fee waivers to people applying for employment authorization documents, certificates of citizenship, and replacements or renewals of legal permanent resident cards, each of which serve as crucial proof of eligibility to work in the United States. Some applicants for renewed "green cards" are naturalization applicants whose N-400s have</p>

ID	Comment.	Commentor	Comment
1180	USCIS-2010-0008-0906	Rebecca Schaeffer, Church World Service	<p>Comment part 5: Withdrawing the Benefits of Citizenship Would Hurt All Americans</p> <p>Naturalization is not just for immigrants. It bestows enormous benefits on all Americans, and a policy that reduced its rate would harm everyone. When they become citizens, naturalized Americans enjoy greater responsibility and opportunity. Their contributions grow, benefitting both our communities and our strength as a nation. We need more, not fewer, LPRs to choose American citizenship. Therefore, we need to preserve our current well-functioning fee waiver procedures.</p> <p>Naturalized citizens earn more than LPRs and are more likely to be employed. For example, the Center for the Study of Immigrant Integration (CSII) at the University of Southern California found in 2012 that when people naturalize their earnings increase by an average of 8 to 11 percent. Naturalization boosts income even when researchers control for other characteristics that affect a worker's value, such as industry, occupation, and length of residence in the United States. A 2015 study commissioned by New York City found further that upon naturalization, the employment rate among people born abroad increased by 2.2 percent.</p> <p>Naturalization therefore benefits everyone. CSII concluded that if all of those eligible to naturalize in 2012 had done so, they would have increased our gross domestic product by \$37 to \$52 billion over ten years. These trends create opportunities for all Americans, and raise government revenue to pay for our common needs, including schools, roads, a strong military, and support for the elderly and disabled. One likely reason for the correlation between citizenship, employment, and income is that to prepare for naturalization, most LPRs study English and U.S. history and government. These lessons help them integrate more deeply into their communities, and pursue lucrative opportunities that require English fluency. Naturalized citizens also become eligible for a wider array of professions and positions. For example, they can be poll workers, or take jobs with federal government agencies. Naturalized citizens have become national political leaders, such as Senator Mazie Hirono, Secretary of Transportation Elaine Chao, and U.S. Representatives Salud Carbajal, Adriano Espaillat, Pramila Jayapal, Raja Krishnamoorthi, Ted Lieu, Stephanie Murphy, Ileana Ros-Lehtinen, Raul Ruiz, Albio Sires, Rithy Kihuen, and Norma Torres.</p>

ID	Comment.	Commentor	Comment
1181	USCIS-2010-0008-0906	Rebecca Schaeffer, Church World Service	<p>Comment part 6: The Proposal Would Violate the Duty of the USCIS</p> <p>Members of Congress have repeatedly instructed U.S.CIs to respect the importance of naturalization. For example, the House of Representatives' Appropriations Committee has written—in many of its Homeland Security bill reports published between FY09 and FY19—that naturalization benefits the nation and must remain affordable and accessible. Most recently in House Report 115-948 accompanying H.R. 6776, the Department of Homeland Security Appropriations Act, 2019, the Committee said, "USOS is expected to continue the use of fee waivers for applicants who can demonstrate an inability to pay the naturalization fee...The Committee encourages USCIS to maintain naturalization fees at an affordable level while also focusing on reducing the backlog of applicants." USCIS must facilitate, not pointlessly impede, the naturalization of residents who are committed to our nation and values.</p> <p>We very strongly urge you to maintain the current fee waiver form and accompanying guidelines set forth in Policy Memorandum PM-602-0011.1, published March 13, 2011.</p> <p>Sincerely, (LAIL 0- siA4,11- Rebecca R. Schaeffer Dal Accredited Immigration Counselor 520 S. Duke Street Durham, NC 27701 (919) 680-3585 rschaeffer@cwsglobal.org</p>

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1220	USCIS-2010-0008-0975	Lakshmi Sridaran South Asian Americans Leading Together (SAALT)	<p>Comment part 2: The Proposed Changes Would Reduce Naturalization and Access to Other Immigration Services</p> <p>Unfortunately, by imposing additional burden on applicants, the entities that assist them, and USCIS and other state and federal agency staff, the proposed changes to the fee waiver application process would severely limit naturalization and impair many South Asians. SAALT strongly oppose this threat to economic and social progress in the South Asian American community. Receipt of a means-tested benefit is the most straightforward and the least labor-intensive method of proving inability to pay USCIS fees, because it leverages analysis that other government agencies have already completed of individuals' income and other relevant circumstances. Forcing fee waiver adjudications to instead consider extensive original documentation of the many factors that determine income or hardship will hinder applicants and slow USCIS's decision-making process, exacerbating the already-sizable backlogs of applications. Requiring submission of a Form I-912 and supporting documentation from every applicant – even those applying simultaneously with identically-situated family members – will have the same negative effects. Many South Asian immigrants rely on fee-waivers to naturalize. The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>South Asians communities experience poverty at high rates, with nearly 472,000 South Asians living in poverty in the United States.³ A 2017 Pew Research Center report states that, ten of the nineteen Asian American groups earned less than \$60,000 annually.⁴ Among those, Bangladeshis and Nepalis had the lowest household incomes, earning \$49,800 and \$43,500 respectively. Nearly 61% of non-citizen Bangladeshi American families receive public benefits for at least one of the four federal programs including TANF, SSI, SNAP, and Medicaid/CHIP, 48% of non-citizen Pakistani families and 11% of non-citizen Indian families also receive public benefits. Among the 8.3 million Americans aged five or older who speak an Asian or Pacific Island language, approximately one in three are limited English proficient (LEP). With reliance on public benefits programs, South Asians, along with many other immigrant groups, demonstrate the reliability of means-tested public benefits as a primary evidence of financial hardship. Because of the South Asian communities' low English proficiency, high poverty rates, and reliance on welfare programs, removing automatic waivers only further decreases the ability of our communities from naturalizing.</p>

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1239	USCIS-2010-0008-1013	Yadira Chavez, On The Move/Citizenship Legal Services	<p>Comment part 4: Needs of Napa County</p> <p>According to Census data (American Community Survey 5-Year estimates 2010-2014) 32,296 Napa residents are foreign-born, and of those, 19, 277 are not yet U.S. Citizens. Approximately 8, 800 of them are citizenship-eligible Legal Permanent Residents (LPRs), or Green Card holders, according to data compiled by demographer Rob Paral & Associates. Yet, there has been an extreme shortage of low-cost, immigration and naturalization legal services to help immigrant families navigate the complex process of stabilizing their immigration status and applying for citizenship. Further underscoring the need for additional outreach and legal services is the fact that Napa County residents do not become citizens at the rate experienced across California. Per the “Profile of Immigrants in Napa County” (https://www.migrationpolicy.org/research/profile-immigrants-napa-county) study commissioned by Napa Valley Community Foundation and conducted by the Migration Policy Institute, only 30 percent of Napa County's foreign-born population have become citizens, as compared to 37 percent in the state overall.</p> <p>Due to these findings, CLS was created. Since the birth of CLS we have provided 3,129 legal consultations and completed 2,787 citizenship and other immigration applications. 474 individuals have participated in the citizenship preparation classes in Napa County. Our collaborative outreach efforts have reached over 99,199 people, and we have recruited and trained over 400 volunteers to assist with our efforts. All of these efforts have resulted in 1, 058 new citizens in the last five years. In May of 2015, this Napa-focused partnership has been lauded by the White House Task Force on New Americans as a model for its success in dramatically increasing access to immigration legal services for low-income, hard-to-reach rural immigrants in Napa County.</p>

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1245	USCIS-2010-0008-1063	Erin Hustings, Naturalization Working Group	<p>Comment part 3: The Proposal Will Prevent Qualified Legal Permanent Residents from Naturalizing</p> <p>USCIS's proposal contravenes the best interest of our nation. New fee waiver procedures would hurt all Americans by dissuading qualified, valuable individuals from applying for citizenship and other critical benefits.</p> <p>The high expense deters naturalization. Members of Congress and our organizations support flexibility on fees because the steep cost of applying for citizenship is the primary barrier to naturalization. Surveys show that most LPRs want to become U.S. citizens. In the 2012 study by Pew Hispanic Center, for instance, 93 percent of Latino immigrants aspired to naturalize. However, many of them say that the cost of naturalizing has stopped them. A study published in 2018 by Stanford University's Immigration Policy Lab confirmed this phenomenon. Researchers offered naturalization fee scholarships to interested LPRs, and found that when they removed the fee as a barrier, applicants rate of naturalization doubled.</p> <p>The added complexity would be another deterrent. By complicating the fee waiver process, USCIS would push naturalization out of the reach of a great many applicants, whose U.S. citizenship would have increased their civic and financial contributions to their communities. Many LPRs would forego the difficulty and expense of pursuing naturalization, since they already enjoy indefinite permission to live and work in the United States. A further deterrence is the greater uncertainty from the proposed change. Receipt of a means-tested benefit is reliably competent evidence of qualification for a fee waiver, whereas adjudicators' evaluation of income and financial hardship would be more subjective, and the results less predictable. Fewer LPRs would begin a more effort-intensive process that promised less assurance of success.</p> <p>This proposal would also likely weaken the ability of hard-working immigrants and</p>

ID	Comment.	Commentor	Comment
1246	USCIS-2010-0008-1063	Erin Hustings, Naturalization Working Group	<p>Comment part 4: Withdrawing the Benefits of Citizenship Would Hurt All Americans</p> <p>Naturalization is not just for immigrants. It bestows enormous benefits on all Americans, and a policy that reduced its rate would harm everyone. When they become citizens, naturalized Americans enjoy greater responsibility and opportunity. Their contributions grow, benefitting both our communities and our strength as a nation. We need more, not fewer, LPRs to choose American citizenship. Therefore, we need to preserve our current well-functioning fee waiver procedures.</p> <p>Naturalized citizens earn more than LPRs and are more likely to be employed. For example, the Center for the Study of Immigrant Integration (CSII) at the University of Southern California found in 2012 that when people naturalize their earnings increase by an average of 8 to 11 percent. Naturalization boosts income even when researchers control for other characteristics that affect a worker's value, such as industry, occupation, and length of residence in the United States. A 2015 study commissioned by New York City found further that upon naturalization, the employment rate among people born abroad increased by 2.2 percent.</p> <p>Naturalization therefore benefits everyone. CSII concluded that if all of those eligible to naturalize in 2012 had done so, they would have increased our gross domestic product by \$37 to \$52 billion over ten years. These trends create opportunities for all Americans, and raise government revenue to pay for our common needs, including schools, roads, a strong military, and support for the elderly and disabled. One likely reason for the correlation between citizenship, employment, and income is that to prepare for naturalization, most LPRs study English and U.S. history and government. These lessons help them integrate more deeply into their communities, and pursue lucrative opportunities that require English fluency. Naturalized citizens also become eligible for a wider array of professions and positions. For example,</p> <p>they can be self-employed or take jobs with federal government agencies. Naturalized</p>

ID	Comment.	Commentor	Comment
1247	USCIS-2010-0008-1063	Erin Hustings, Naturalization Working Group	<p>Comment part 5: Finally, the Proposal Would Violate the Duty of the USCIS Members of Congress have repeatedly instructed USCIS to respect the importance of naturalization. For example, the House of Representatives' Appropriations Committee has written—in many of its Homeland Security bill reports published between FY09 and FY19—that naturalization benefits the nation and must remain affordable and accessible. Most recently in House Report 115-948 accompanying H.R. 6776, the Department of Homeland Security Appropriations Act, 2019, the Committee said, "USCIS is expected to continue the use of fee waivers for applicants who can demonstrate an inability to pay the naturalization fee...The Committee encourages USCIS to maintain naturalization fees at an affordable level while also focusing on reducing the backlog of applicants." USCIS must facilitate, not pointlessly impede, the naturalization of residents who are committed to our nation and values.</p> <p>We very strongly urge you to maintain the current fee waiver form and accompanying guidelines set forth in Policy Memorandum PM-602-0011.1, published March 13, 2011.</p> <p>Sincerely,</p> <p>Asian & Pacific Islander American Vote - Michigan Asian Americans Advancing Justice - Los Angeles Asian Americans Advancing Justice AAJC 7 Asian Counseling and Referral Service (Seattle, WA) Asian Pacific American Labor Alliance, AFL-CIO Asian Pacific American Legal Resource Center (APALRC) Bonding Against Adversity, Inc. CARPGEN DC</p>

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1283	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>The City of Seattle (City) submits this comment in response to the proposed rule published by the Department of Homeland Security (DHS) and the United States Citizenship and Immigration Services (USCIS) in their Notice of Proposed Rule Making published on September 28, 2018.</p> <p>The City of Seattle strongly opposes the proposed rule to modify the Form 1-912, Request for Fee Waiver.</p> <p>The City of Seattle created the Office of Immigrant and Refugee Affairs (OIRA) in 2012 to improve the lives of Seattle's immigrant and refugee families. In line with the City of Seattle values of social justice and equity, OIRA works to strengthen immigrant and refugee communities by engaging them in decisions about the City of Seattle's future and improving the City's programs and services to meet the needs of all constituents. We believe supporting immigrants creates a stronger future for our nation. Just as previous immigrants did before, today's immigrants are tomorrow's U.S. citizens who will be fully engaged in the cultural and civic life of our society both locally and nationally.</p> <p>To that end, OIRA funds and coordinates two naturalization programs called the New Citizen Campaign (NCC) and the New Citizen Program (NCP) to help an estimated 75,000 Seattle-area lawful permanent residents (LPRs) become U.S. citizens. We work with local and national partners to engage these LPRs via outreach, education, citizenship workshops, legal assistance, and case management.</p> <p>The Form 1-912 allows individuals with financial need to apply for certain immigration benefits without a filing fee. Fee waivers aid the most vulnerable immigrants, including refugees, asylees, unaccompanied minors, and victims of trafficking. For LPRs eligible to naturalize, it affords those unable to pay the \$725 filing fee the opportunity to achieve the dream of U.S. citizenship.</p> <p>About the New Citizen Campaign (NCC)</p> <p>The New Citizen Campaign (NCC) works with community partners to co-host events called "citizenship clinics" all over Seattle, serving an average of 30-50 individuals per month. Additionally, NCC has organized large-scale events that have to date served 1,082 lawful permanent residents. Individuals are</p> <p>screened by both an immigration attorney and Department of Justice (DOJ) accredited</p>

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1353	USCIS-2010-0008-1021	Christine Chen, Asian Americans Advancing Justice - Los Angeles	<p>Comment part 5: IV. Naturalization Benefits All Americans</p> <p>Residents across the state and country depend upon USCIS to administer benefits fairly and efficiently. When the USCIS fulfills this important component of its mission, it helps our families, employers, and civic institutions thrive by ensuring that U.S. citizenship is open to all people who qualify under the law. The agency also honors our nation’s values when it recognizes that U.S. citizens and our communities benefit greatly from immigrants’ contributions and access to visas, work permits, and naturalization.</p> <p>The economic benefits and opportunities naturalization affords cannot be overstated. Advancing Justice – LA knows intimately the value and benefits naturalization provides to the API community. For example, naturalized citizens earn more than LPRs and are more likely to be employed. The Center for the Study of Immigrant Integration (CSII) at the University of Southern California found in 2012 that when people naturalize, their earnings increase by an average of 8% to 11%. In other words, a 10% increase in earnings would mean an extra \$3,765 each year for a family of four at 150% of the federal poverty line.</p> <p>Naturalized citizens are engaged members of their communities. Advancing Justice – LA has experienced firsthand the greater engagement of newly naturalized citizens. Former clients have applied for a wider arrange of professions and positions, enlisted in the U.S. military, obtained greater health benefits and health access for themselves and their elderly and ailing parents, volunteered to become poll workers, and even volunteered with Advancing Justice – LA with</p> <p>LPRs applying for naturalization. A person who knows that she or he will remain in the United States for life is one who can put down roots with confidence, and who is therefore more likely to start a business or buy a home or assets, thereby further contribute to the economy.</p> <p>This proposal also departs from the federal government’s longstanding appreciation of the special benefit that naturalization confers by making our nation stronger and more prosperous. As the numbers of naturalized citizens and organizations assisting them have grown,</p> <p>researchers have assessed more extensive data that have deepened our understanding of the</p>

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1406	USCIS-2010-0008-1169	Adrienne Pon on behalf of the City and County of San Francisco and the San Francisco Immigrant Rights Commission	<p>Comment part 5: Withdrawing the benefits of citizenship hurts all Americans</p> <p>Naturalization is a policy that benefits all Americans, including immigrants. Naturalized Americans enjoy greater responsibility and opportunity, their contributions grow, benefitting both our communities and our strength as a nation. We need more, not fewer, Legal Permanent Residents (LPRs) to choose American citizenship.</p> <p>Naturalized citizens earn more than LPRs and are more likely to be employed. For example, the Center for the Study of Immigrant Integration (CSII) at the University of Southern California found in 2012 that when people naturalize their earnings increase by an average of 8 to 11 percent.⁴ Naturalization boosts income even when researchers control for other characteristics that affect a worker's value, such as industry, occupation, and length of residence in the United States. According to CSII, if all LPRs eligible to naturalize in 2012 had done so, they would have increased our gross domestic product by \$37 to \$52 billion over ten years.⁵</p> <p>These trends create opportunities for all Americans in terms of jobs, buying power, and increased earnings. They also increase government revenue to pay for universal needs, such as infrastructure, roads, hospitals, and schools.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, would create insurmountable barriers for those seeking to secure their immigration status, remain in their communities, and naturalize so that they can participate fully in American life, be civically engaged and contribute in meaningful ways to the success of our cities, states and the country.</p> <p>We urge USCIS not to implement the proposed rule change, but to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization.</p> <p>This will bring us closer to an inclusive process that honors our country's commitment to</p>

ID	Comment.	Commentor	Comment
1423	USCIS-2010-0008-1180	Marita Etcubanez, Asian Americans Advancing Justice AAJC	<p>Comment part 5: IV. Naturalization Benefits All Americans</p> <p>Residents across the country depend upon USCIS to administer benefits fairly and efficiently. When USCIS fulfills this important component of its mission, it helps our families, employers, and civic institutions thrive by ensuring that U.S. citizenship is open to all people who qualify under the law. The agency also honors our nation’s values when it recognizes that U.S. citizens and our communities benefit greatly from immigrants’ contributions and access to visas, work permits, and naturalization.</p> <p>The economic benefits and opportunities naturalization affords cannot be overstated. Naturalized citizens earn more than legal permanent residents and are more likely to be employed. The Center for the Study of Immigrant Integration (CSII) at the University of Southern California found in 2012 that when people naturalize, their earnings increase by an average of 8-11%. In other words, a 10% increase in earnings would mean an extra \$3,765 each year for a family of four at 150% of the federal poverty line.</p> <p>Naturalized citizens are engaged members of their communities. Many of the individuals we assist through Citizenship Workshops express their enthusiasm for voting. Further, a person who knows that she or he will remain in the U.S. for life is one who can put down roots with confidence, and who is therefore more likely to start a business or buy a home, and thereby further contribute to the economy. This proposal also departs from the federal government’s longstanding appreciation of the special benefit that naturalization confers by making our nation stronger and more prosperous.</p> <p>As numbers of naturalized citizens and organizations assisting them have grown, researchers have amassed more extensive data that have sharpened our understanding of the many benefits that flow from individuals’ decisions to naturalize. Increasingly, Congress and other policymakers have responded by calling on USCIS to promote naturalization, make it more accessible to eligible LPRs, and encourage English language learning and civics instruction. USCIS, in turn, has created the Office of Citizenship, administered grants, and undertaken</p> <p>extensive community education to achieve these goals. It is in the best interests of all Americans</p>

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1435	USCIS-2010-0008-1193	Joshua Hoyt, National Partnership for New Americans	<p>Comment part 4: Limiting Access to Citizenship Harms Communities and the Nation as a Whole</p> <p>Access to citizenship has always made the United States stronger. Millions have come to this country in search of a better life, worked hard, became an integral part of their communities, and contributed to their families and the economy. After many years, they applied for citizenship as part of a process that was envisioned by the founders of this nation, created by the Constitution, and codified in federal law and regulations.xi The proposed rule betrays this history and the values that it represents by making the path to citizenship accessible to only a wealthy few. This will not only harm LPRs who are eligible for citizenship but it will harm their families, our communities, and the nation as a whole.</p> <p>There is a series of benefits that access to citizenship creates for communities and the nation and they should be protected. After an eligible LPR naturalizes, they are able to vote, serve on a jury, and run for political office. This creates a diversity of backgrounds, perspective, and insight that strengthens the political and democratic system. After naturalizing, new citizens on average receive eight to eleven percent more in income (an average of approximately \$2,200 per year), as compared to LPRs who are eligible but do not apply for citizenship. New citizens enjoy increased employment rates, including access to public sector and government jobs. And their likelihood of owning a home almost doubles, compared to non-citizens, in effect, strengthening the local housing market and tax base.xii On a national scale, if 1.5 million LPRs naturalized every year over the next five years, the Gross Domestic Product would increase by 37-52 billion dollars over the ten years following that increase in naturalization.xiii</p> <p>By cutting off access to elderly and working poor immigrants, the proposed rule not only harms LPRs who are eligible for citizenship. It also harms their families, their communities, and the nation as whole. It will negatively impact the national economy as well as the nation's democracy. Instead, we should include and welcome LPRs and other eligible immigrants.</p> <p>For the above reasons, we strongly urge DHS and USCIS to withdraw the proposed rule on fee waivers, and, instead, address the significant issues that the agency has with access to citizenship, including, but not limited to, the enormous backlog of citizenship applications and unprecedented waiting times. We</p>

ID	Comment.	Commentor	Comment
1472	USCIS-2010-0008-1234	Courtney Carter	<p>Comment part 3: The Proposal Will Prevent Qualified Legal Permanent Residents from Naturalizing</p> <p>USCIS's proposal contravenes the best interest of our nation. New fee waiver procedures would hurt all Americans by dissuading qualified, valuable individuals from applying for citizenship and other critical benefits.</p> <p>The high expense deters naturalization. Members of Congress and our organizations support flexibility on fees because the steep cost of applying for citizenship is the primary barrier to naturalization. Surveys show that most LPRs want to become U.S. citizens. In the 2012 study by Pew Hispanic Center, for instance, 93 percent of Latino immigrants aspired to naturalize. However, many of them say that the cost of naturalizing has stopped them. A study published in 2018 by Stanford University's Immigration Policy Lab confirmed this phenomenon. Researchers offered naturalization fee scholarships to interested LPRs, and found that when they removed the fee as a barrier, applicants' rate of naturalization doubled.</p> <p>The added complexity would be another deterrent. By complicating the fee waiver process, USCIS would push naturalization out of the reach of a great many applicants, whose U.S. citizenship would have increased their civic and financial contributions to their communities. Many LPRs would forego the difficulty and expense of pursuing naturalization, since they already enjoy indefinite permission to live and work in the United States. A further deterrence is the greater uncertainty from the proposed change. Receipt of a means-tested benefit is reliably competent evidence of qualification for a fee waiver, whereas adjudicators' evaluation of income and financial hardship would be more subjective, and the results less predictable. Fewer LPRs would begin a more effort-intensive process that promised less assurance of success.</p> <p>This proposal would also likely weaken the ability of hard-working immigrants and Americans to maintain their employment and self-sufficiency. USCIS can grant fee waivers to people applying for employment authorization documents, certificates of citizenship, and replacements or renewals of legal permanent resident cards, each of which serve as crucial proof of eligibility to work in the United States. Some</p>

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1473	USCIS-2010-0008-1234	Courtney Carter	<p>Comment part 4: Withdrawing the Benefits of Citizenship Would Hurt All Americans</p> <p>Naturalization is not just for immigrants. It bestows enormous benefits on all Americans, and a policy that reduced its rate would harm everyone. When they become citizens, naturalized Americans enjoy greater responsibility and opportunity. Their contributions grow, benefitting both our communities and our strength as a nation. We need more, not fewer, LPRs to choose American citizenship. Therefore, we need to preserve our current well-functioning fee waiver procedures.</p> <p>Naturalized citizens earn more than LPRs and are more likely to be employed. For example, the Center for the Study of Immigrant Integration (CSII) at the University of Southern California found in 2012 that when people naturalize their earnings increase by an average of 8 to 11 percent. Naturalization boosts income even when researchers control for other characteristics that affect a worker's value, such as industry, occupation, and length of residence in the United States. A 2015 study commissioned by New York City found further that upon naturalization, the employment rate among people born abroad increased by 2.2 percent.</p> <p>Naturalization therefore benefits everyone. CSII concluded that if all of those eligible to naturalize in 2012 had done so, they would have increased our gross domestic product by \$37 to \$52 billion over ten years. These trends create opportunities for all Americans, and raise government revenue to pay for our common needs, including schools, roads, a strong military, and support for the elderly and disabled. One likely reason for the correlation between citizenship, employment, and income is that to prepare for naturalization, most LPRs study English and U.S. history and government. These lessons help them integrate more deeply into their communities, and pursue lucrative opportunities that require English fluency. Naturalized citizens also become eligible for a wider array of professions and positions. For example, they can be poll workers, or take jobs with federal government agencies. Naturalized citizens have become national political leaders, such as Senator Mazie Hirono, Secretary of Transportation Elaine Chao, and U.S. Representatives Salud Carbajal, Adriano Espaillat, Pramila Jayapal, Raja Krishnamoorthi, Ted Lieu, Stephanie Murphy, Ileana Ros-Lehtinen, Raul Ruiz, Albio Sires, Ruben</p>

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1474	USCIS-2010-0008-1234	Courtney Carter	<p>Comment part 5: Finally, the Proposal Would Violate the Duty of the USCIS</p> <p>Members of Congress have repeatedly instructed USCIS to respect the importance of naturalization. For example, the House of Representatives’ Appropriations Committee has written—in many of its Homeland Security bill reports published between FY09 and FY19—that naturalization benefits the nation and must remain affordable and accessible. Most recently in House Report 115-948 accompanying H.R. 6776, the Department of Homeland Security Appropriations Act, 2019, the Committee said, “USCIS is expected to continue the use of fee waivers for applicants who can demonstrate an inability to pay the naturalization fee...The Committee encourages USCIS to maintain naturalization fees at an affordable level while also focusing on reducing the backlog of applicants.” USCIS must facilitate, not pointlessly impede, the naturalization of residents who are committed to our nation and values.</p> <p>We very strongly urge you to maintain the current fee waiver form and accompanying guidelines set forth in Policy Memorandum PM-602-0011.1, published March 13, 2011.</p> <p>Sincerely, Law Office of Courtney A. Carter</p>

ID	Comment.	Commentor	Comment
1487	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>Comment part 4: B. Otherwise eligible applicants will be deterred from pursuing naturalization or requesting proof of status, unfairly excluding them from critical immigration benefits due to their inability to pay. This proposal will impose unnecessary barriers on individuals, especially those who are vulnerable, in applying for immigration benefits for which they are eligible. Even now, the filing fee associated with various immigration benefits is an insurmountable barrier for applicants and their families. Requiring more documents and adding complexity to the application process will further deter applications for immigration benefits or naturalization —not because a person is ineligible, but because the government has erected a needless hurdle in his/her path. These additional burdens placed on applicants will prevent them from securing a permanent future here in the U.S.</p> <p>This rule change creates greater uncertainty of a fee waiver grant and will deter otherwise eligible applicants from pursuing agency services ranging from basic identification documents to major events like obtaining citizenship through naturalization. Studies show that a significant number of people eligible for naturalization choose not to because of the cost of applying.² The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship. This number would undoubtedly increase as fee waivers become more difficult to access. Receipt of a means-tested benefit has long served as a bright-line qualification for a fee waiver, whereas an adjudicator’s evaluation of income and financial hardship is discretionary, thus rendering the results less predictable. Fewer immigrants would begin this more intensive and burdensome process, when coupled with less assurance of success.</p> <p>The harms of the proposed rule extend beyond applicants for naturalization, with people living in or near poverty losing access to fee waivers for services such as applying for employment authorization documents, certificates of citizenship, and replacements or renewals of legal permanent resident cards, each of which serve as crucial proof of eligibility to work in the United States. These services are essential for day-to-day living in the U.S., serving as proof of work authorization, eligibility to vote, and, critically, proof of lawful presence in the U.S. when confronted with immigration enforcement. These</p> <p>services should not be contingent on whether an individual can afford to pay for them. Reducing the</p>

ID	Comment.	Commentor	Comment
57	USCIS-2010-0008-0200	Rachel Kafele	<p>Proposal will prevent thousands of low-income individuals from accessing their rightful immigration benefits.</p> <p>The I-912 Fee Waiver is available to waive the fee for applications for many lawful immigration benefits, including adjusting to lawful permanent residency, getting replacement documents, filing appeals of decisions, and becoming a citizen.</p> <p>Removal of this evidentiary option will inevitably prevent many immigrants from filing eligible applications.</p> <p>This proposal indicates that USCIS has disdain for the rights and wellbeing of low-income immigrants, which runs contrary to the organizations stated mission of fairly adjudicating requests for immigration benefits.</p> <p>Proposal ignores the reality of disparate costs of living across the United States.</p> <p>The U.S. Department for Health and Human Services only publishes poverty guidelines for the continental 48 states, Hawaii, and Alaska. This means that the same income cut off is used for all continental states.</p> <p>Means tested benefits use different metrics in different parts of the country because the United States is a diverse country, and the cost of living varies regionally.</p> <p>Social services agencies and state legislators have acknowledged this reality by setting income guidelines for means tested benefits that are relative to the regional and local costs of living.</p> <p>This proposal would ignore this rational and relevant determination in favor of an insufficient national standard that does not take into account the lived experiences of applicants for fee waivers.</p> <p>Proposal would significantly increase the time and paperwork required to file an I-912.</p> <p>With only two evidentiary options, applicants are likely to need to pay for additional legal representation and submit additional paperwork.</p> <p>Filing the I-912 on the basis of financial hardship requires applicants to detail their situation, all assets, and all expenses and liabilities, as well as provide documentation for all claims.</p> <p>In the alternative, applying on the basis of a means tested benefit requires the applicant to list and document the benefit received, nothing more.</p> <p>This change will disincentivize legal representatives from taking on cases for the most disadvantaged in our society due to the increased time and paperwork required for filing applications.</p>

ID	Comment.	Commentor	Comment
173	USCIS-2010-0008-0321	Alexandra Gaynor	I deeply disagree with the proposed regulations on immigration application fee waivers. The direct impact of these policies is that many fewer low income persons will be able to remain safely in the United States or gain the right to vote. It is a naked attempt to ensure that only wealthy persons can remain and get the vote and it harms mixed status (families where there are U.S. citizen children, for example, and an immigrant parent) low income families. I work with homeless individuals in a social service agency and recently filled out a permanent residency card fee waiver with a client. There is absolutely no way this father of three, who fled a violence-stricken Haiti in his youth, and who has lived in the United States for two decades, would have been able to pay the fees for the application--jeopardizing his safety and the safety of his children (who are U.S. citizens by birth). Please consider the direct lives that this affects, and how it prizes only people who can pay up

ID	Comment.	Commentor	Comment
178	USCIS-2010-0008-0323	Oscar Montes	<p>Re: DHS Docket No. USCIS-2010-0008, OMB Control Number 1615-0116,, Comments in Response to Proposed Revision Disallowing Proof of Means-Tested Benefit as Basis for Fee Waivers</p> <p>My name is Oscar Rene Montes and I am writing on behalf of Cabrini Immigrant Services of NYC (CIS), a multi-service community and faith-based 501c(3) Department of Justice accredited agency that provides a broad range of culturally and linguistically appropriate services to immigrants, refugees, asylees, and their families. Our mission is to serve the immigrant community in the spirit of Mother Cabrini, a naturalized U.S. citizen, patron saint of immigrants, and the founder of the Missionary Sisters of the Sacred Heart of Jesus. I serve as the staff attorney for CIS and write to oppose the proposed revision by the Department of Homeland Security that would amend the I-912 Request for Fee Waiver in a manner that would not allow for the grant of a fee waiver based on the receipt of a means-tested benefit.</p> <p>This is a matter that is especially important to us at Cabrini Immigrant Services because this change would negatively impact a large number of the clients we represent. In fact, more than 70% of our clients fall below the poverty level, and more than 65% qualify for public assistance. When advising these clients on their immigration cases, it is often apparent that they are stressed about their ability to pay the filing fees for their applications. In some cases, even applicants who qualify for a fee waiver are prepared hold off on filing until they are able to save up the money. The ability to file a simple I-912 with evidence of their receipt of a means-tested benefit then comes as a great source of relief. Without this avenue for a fee waiver, applicants will have to gather much more evidence to sufficiently show to immigration their inability to pay the fee.</p> <p>This proposed revision would also lead to applications being denied because of insufficient evidence to support a fee waiver in cases where an individual might truly merit one. Individuals who complete the I-912 pro se will have a harder time getting approvals because it will be harder to properly document their financial situation. Others might not even bother to try to gather the funds or evidence and decide on foregoing the applications entirely. USCIS should be working to make sure individuals feel empowered and encouraged to file the proper forms, instead of discouraging them by making processes needlessly complex.</p> <p>There is also a flaw in the reasoning behind the proposed revision. The proposal states USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver. However, this inconsistency is appropriate and should be accepted as the natural consequence of disparate costs of living across a country as large and diverse as ours. Reasoning that ignores the realities faced by the individuals most affected should not be used as the basis for a proposed revision of this magnitude.</p>

ID	Comment.	Commentor	Comment
245	USCIS-2010-0008-0355	Sumona Patel	<p>It is extremely upsetting that for our immigrant communities, there are significant barriers in order to access their right in this country to apply for changes in their immigration status including applying for asylum and potentially green cards and work permits with such a steep fee of \$725 per application. Many organizations will work with the applicants, if they qualify, to get a fee waiver to make sure that their application is processed in a timely manner. However, given the change where only the tax form will be used to determine this, this will become a significant deterrent for individuals who are applying for a change in their immigration status. Many times, these individuals have not filed their tax returns and do not have one to submit because they are below the poverty line, or there are cases where their employers have changed and they no longer make the same salary that they made the prior year. With this system, they would have to wait for the next income tax filing date before they can submit their immigration paperwork. This is extremely concerning given the tight timelines for submitting immigration documentation. I would request that you fully understand the impact of this program on a right that all individuals have in this country and do not create additional barriers to be able to access these service lines.</p>

ID	Comment.	Commentor	Comment
249	USCIS-2010-0008-0381	Natalie Poltz	<p>Immigration comments</p> <p>I will start off with the practical reasons for supporting immigration in the United States by quoting the Bush Center regarding immigration surplus (https://www.bushcenter.org/catalyst/north-american-century/benefits-of-immigration-outweigh-costs.html) in stating that when immigrants enter the labor force, they increase the productive capacity of the economy and raise GDP. Their incomes rise, but so do those of natives. Its a phenomenon dubbed the immigration surplus, and while a small share of additional GDP accrues to natives typically 0.2 to 0.4 percent it still amounts to \$36 to \$72 billion per year. So theres the money statement. Now comes the personal statement.</p> <p>As a native born American citizen who is now a third generation American, I have had the privileged opportunity o live in many parts of this country. I now recognize as an adult what a unique privilege this was and not alway prevalent in many people that I have encountered. The first people who opened their doors and their hearts to me in each place I moved were often people from the immigrant communities. And what I learned from them that I didnt always gain from native born Americans was a deep sense of appreciation for the freedoms this country offers, a sincere respect for hard work, and an enduring appreciation and understanding of family beyond superficial ties that helped me create a strong foundation for my own life that I couldnt always get from my own birth family alone. It made me feels like a citizen of the world, and that was a very special privilege to wear. I didnt have the money or opportunity to do a lot of international travel for most of my life, so the opportunity to encounter so many different people from all over the world coming to me was a blessing and an education that I couldnt have gotten on my own.</p> <p>At one point, everyone on this continent was an immigrant, and derailed and hated for stealing what others had achieved or built up before them. I do believe that karma is a debt that must be paid even if we want to forgive it because it teaches true understanding by placing one in the shoes of the other. so that they understand and then find common ground to work together. How much similar must have the native tribes of this country felt in wanting to welcome these new immigrants from foreign lans who they knew to be the other and many times hurt or harmed their communities and people. But yet they still felt compelled by a force bigger than themselves to want to do the right thing by God. Thats how I feel about the immigration issue today. I read about some awful stories that are then promoted by the media but Im then balanced by recognizing how many equally awful things are done by people who are supposedly our own and realize that these are separate issues. And when it comes to immigration I choose to be guided by my heart which tells me you help the immigrants no matter what because whether you know it yet or not, they are the teachers coming in, compelled, to make your life better, and a more meaningful existence. Trust it, trust, the process, Trust God, and trust love. The universe absolutely will work this out and you can choose to be on the side that encourages unity or division but know that unity is the right path.</p>
250	USCIS-2010-0008-0393	Kelly Skillingstead	<p>I object to the proposed revision to the fee waiver process. Many folks from marginalized communities such as elderly people, immigrants and low income families would be disproportionately impacted by the suggested changes. We should not block any opportunities that allow these communities to receive a waiver for their citizenship application.</p>

ID	Comment.	Commentor	Comment
320	USCIS-2010-0008-0477	Catherine Walline	Opportunity is a key element of the fabric of the United States of America. It follows, then, that those seeking citizenship should be able to apply regardless of their financial means. The high application fee would likely prevent many candidates from pursuing their goal of citizenship. If the country is to further its noble goal of opportunity for all, then removing obstacles such as this application fee is imperative.
324	USCIS-2010-0008-0470	Julia Pei	This isn't equitable, why would you want to have another barrier that is solely based on income. I understand if you want more background checks or more reference checks or employment checks or whatever else to evaluate if someone is eligible to be a citizen. But if you just want to get rid of the fee, you are tell low-income immigrants that money will define whether or not they can even apply to go through the process. You are telling people that the US will only accept new citizens who can afford it. Don't do it.
338	USCIS-2010-0008-0509	Sagie Tvizer	<p>Applicants living in poverty are entitled to fee waivers. Any increases in efficiency brought about denying or creating a burden of accessing such waivers is unfair and antithetical to the goals of USCIS.</p> <p>I hold dual U.S. and Israeli citizenship. My father is a green card holder. I have led Know Your Rights Trainings and am considering an AmeriCorps service year with Project Citizenship. Burdening impoverished fee waiver applicants is not an effective mechanism of achieving efficiency. Please center the comments of nonprofit and advocacy organizations when making a decision on whether this policy is implemented.</p> <p>Thank you for the opportunity to comment.</p> <p>Sagie Tvizer</p>

ID	Comment.	Commentor	Comment
350	USCIS-2010-0008-0489	Dena Jensen	<p>Dear Ms. Deshommes:</p> <p>I am writing in opposition to the Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Under the present circumstances of increased persecution of immigrants in our country, we should in no way be increasing roadblocks to legal entrance to the United States that have primarily to do with how much money people can pay to get here. If supposedly we are trying to keep people associated with drug cartels out of our country, this approach will not be helpful in doing that in the least.</p> <p>I ask that these proposed changes that make gaining entrance to the U.S. more burdensome for applicants, communities, federal agencies, and service providers, be discarded. Changes to our immigration rules should happen when the process has been initiated for thorough reform of our immigration system that is focused on a humane and non-racist, non fear-based, approach to accepting people into our country and seeing to it that they and all other citizens are assisted in gaining the necessary stability to thrive and contribute to their own, their communitys, and our countrys well being.</p> <p>Sincerely, Dena Jensen Birch Bay, WA</p>
366	USCIS-2010-0008-0483	Cheron Holman	<p>These proposed changes would deny access to relief for deserving immigrants and would favor the wealthy over working class people, low-wage workers, and vulnerable populations who make immeasurable contributions to our communities and our economy.</p>

ID	Comment.	Commentor	Comment
374	USCIS-2010-0008-0515	Antonio Quinonez- Munoz	Affordability should not be a barrier to citizenship. Americans come from all walks of life, as do the people looking to become Americans. Citizenship opens up vistas that may have previously been occluded from them and anything we can do to allow people to better themselves and raise their participation in our shared experience should be encouraged. Please continue to keep the path to citizenship as within reach of those that want it as possible. In the end, we all benefit from growing the pool of Americans and having people live the American dream.
405	USCIS-2010-0008-0589	Andrew Huntington	<p>To whom it may concern,</p> <p>These fees are wrong and they negatively impact vulnerable and low income people. Getting these fees waived is important. Paying these fees is bad. As a psychiatric nurse practitioner in the homeless community here in Seattle, I know how important it is to keep every dollar in your pocket. The ability to unite families and keep communities together is one of the most important American ideals. We are the richest Country in the history of the world and we should be judged by how we take care of the most vulnerable in our country. We need to be welcoming and not only pick and choose people to welcome to our great country. Financial power shouldn't impact the ability for a family to be together!</p> <p>Thanks for your time!</p>

ID	Comment.	Commentor	Comment
408	USCIS-2010-0008-0574	Erin Fanning	Changes to the fee waiver eligibility process are bad policy because they will result in fewer green card holders applying to become citizens. This is bad for our communities. Green card holders, like my husband, who prepare to naturalize study and learn English. Once my husband decided to apply for citizenship he worked so hard to improve his English skills and to learn so much about our government and our history. He will be able to contribute to our community and to our economy much more as a citizen. It is bad for all of us if legal permanent residents do not become citizens. We need to have fee waivers available for low income people. Please keep this fee waiver.
431	USCIS-2010-0008-0556	Southiwa Souvannaphasy	I oppose these changes. They are dangerous to our immigrant communities.
436	USCIS-2010-0008-0593	Judy Lee	I have been an immigrant living in this country for over 40 years. Our entire family has naturalized and the costs to obtain citizenship was a struggle. It is disheartening to see the rates rise as they have. I also have internationally adopted children whose adoption costs were exorbitant and the costs of obtaining citizenship documents added to the hardship. Please keep the pathway to citizenship open by keeping it as affordable as possible. Citizen feel like they belong and helps with "ownership" in our country. Thank you.
438	USCIS-2010-0008-0568	Josina Bohmer- Tapia	I strongly oppose the changes to the current fee waiver system for a number of reasons. These changes severely limit those who have the opportunity to have even GREATER opportunity by adjusting or renewing their immigration status. Immigrants come to the US due to a number of hardships in their countries of origin including persecution, violence, poverty, etc. Their ability to escape such unimaginable circumstances cannot not be based on who can or cannot afford it.

ID	Comment.	Commentor	Comment
446	USCIS-2010-0008-0552	Quinn Brown	Please do not proceed with this rule change. It has debilitating effects on low-income, immigrant communities and creates barriers for them to advance their lives and be productive members of society. The only reason to do this would be to make the lives of immigrants more difficult and to keep them in poverty and reduce their chances of being productive members of US society.
449	USCIS-2010-0008-0566	Thao Nguyen	To Whom It May Concern - Please reconsider the proposed changes to the fee waiver eligibility process as it is disproportionately biased towards our low income community who are less likely to be able to afford the fee without assistance. The outcome of the regulatory actions are discriminatory and it will set back the progress we have achieved as a country.
486	USCIS-2010-0008-0631	Terry Bradley	I work with the immigrant community and have so for many years. This measure will be devastating to the community within which I work. It will result in an overwhelming burden to members of a community that already experienced insurmountable hardship. Please do not put these new restrictions into place
505	USCIS-2010-0008-0663	Deependra Adhikari	Please don't do it. This goes against our American Values of taking care of those who are less fortunate and and less affluent. These immigrants and refugees will some day more than pay for their fair share by their hard work and contributions to the US economy. Please dont make it any harder for them than it already is.

ID	Comment.	Commentor	Comment
511	USCIS-2010-0008-0636	Margaret A. Gaffney	<p>I oppose the proposed revisions to the fee waiver eligibility process. The changes USCIS proposes will make proving eligibility for the fee waiver much more difficult for people who cannot afford the application fee to become U.S. citizens. The proposed revisions would also impact other immigration-related applications such as green card renewals, work permits, and certificates of citizenship for children. The proposed change is unjustified, needlessly complex, and counterproductive.</p> <p>I am an immigration attorney who works exclusively with low-income and no-income immigrants. These people, my clients, are highly motivated to become citizens, to be able to vote, to have a voice, to become part of the mainstream of society. It is highly offensive to my values and to the history and culture of the USA, to have significant financial means, to be eligible for US citizenship.</p> <p>I urge USCIS to withdraw the proposed revisions to the fee waiver eligibility process.</p>
514	USCIS-2010-0008-0604	Dorothy Culjat	<p>Please add my opposition to this proposed revision which will adversely affect immigrants who already depend on methods that are currently accepted to use to verify their income when applying for fee waivers. This will only create a barrier to access to citizenship for those who have the potential to contribute so much to our country.</p> <p>Thank you for reconsidering this revision.</p> <p>Dorothy Culjat 7712 19th Avenue NW Seattle, WA 98117</p>

ID	Comment.	Commentor	Comment
522	USCIS-2010-0008-0621	Rebecca Remis	This country was built on immigrants. Not just rich immigrants but immigrants of all kinds. Across the aisle, we believe in the American dream whereby folks pick themselves up and make something of themselves. This issue lets the American dream only happen to folks who already have money in the bank and rob our country of the rich fabric in our nation.
524	USCIS-2010-0008-0635	Maria Brunnes	<p>I oppose the proposed revisions to the fee waiver eligibility process. The changes USCIS proposes will make proving eligibility for the fee waiver much more difficult for people who cannot afford the application fee to become U.S. citizens. The proposed revisions would also impact other immigration-related applications such as green card renewals, work permits, and certificates of citizenship for children. The proposed change is unjustified, needlessly complex, and counterproductive.</p> <p>The opportunity of becoming an U.S. citizen shouldnt be measured and depend on an income. Every person who shows allegiance to the constitution and motivation to naturalize should be able to do so. The proposed rule just punishes people for not having certain income and denies immigrants basic rights.</p> <p>I urge USCIS to withdraw the proposed revisions to the fee waiver eligibility process.</p>
529	USCIS-2010-0008-0632	Elba Rodriguez	<p>I oppose the Trump proposed fee waiver regulations because I assure you that there are many legal immigrants that their whole life have been working in and for this beautiful country and still be unable to become U. S. Citizens due to their low income.</p> <p>Enough is enough.</p>

ID	Comment.	Commentor	Comment
530	USCIS-2010-0008-0630	Julianne Siegfriedt	<p>Thank you for your time in reading my comment. I would like to urge the Department of Homeland Security to WITHDRAW the proposed rule on fee waivers. It is an unnecessary barrier and is a transparent attempt by the current administration to create barriers on individuals based on wealth and class status. That is wholly un-American. Excluding people based on wealth status (which this rule would do) is very Trump-ian and does not reflect the values of this country. As a United States citizen, hardworking American, and the daughter and granddaughter of veterans who have fought for the right of people to enter this country, I ask you to stop this rule blocking fee waivers.</p> <p>Thank you for your time.</p>
535	USCIS-2010-0008-0710	Max Wasser	I oppose the proposed changes to the fee waiver policy. Having worked for an immigration attorney in my family, I have seen the stories of the diverse backgrounds of legal residents in the USA. Many have come to this country to start a new life but have struggled financially. I do not believe that it is in the best interest of building our country to make it more difficult for the lowest income residents to obtain assistance.
548	USCIS-2010-0008-0693	Melani Shahin	It is unfair to increase the expenses for low income immigrants to become naturalized citizens. I am against making it more difficult for low income immigrants to get waivers for the fees associated with naturalization.

ID	Comment.	Commentor	Comment
550	USCIS-2010-0008-0704	Brianna Kline	I am writing to express my concern regarding considerations to limiting fee waiver eligibility and increasing the burden of applying for a fee waiver. Many hard working, deserving individuals who desire to come to and stay in the US the right way would be unjustly burdened by the proposed changes, and our country would miss out on the opportunity the incorporate these bright hardworking individuals into our society. I have worked with migrants and refugees for many years and know that for most of them, the exorbant costs of fees would prevent them from being able to complete the legal forms they are obligated to do in a timely manner. I strongly urge USCIS to take this into consideration and to not add burden to those applying.
556	USCIS-2010-0008-0681	Mansi Goel	<p>To Whom It May Concern at DHS:</p> <p>Immigrants are the backbone of America. We need to make it possible for more people to participate in the American dream and to make the contributions we sorely need in this society.</p> <p>It's unconscionable to make the uncertain process of naturalization more painful and difficult by holding poverty against immigrants. Please withdraw the proposed rule on fee waivers. Many immigrants who are poor when they arrive go on to thrive and become leaders in their community (such as I did).</p> <p>Thank you.</p>
559	USCIS-2010-0008-0725	Nancy Farrell	I am opposed to the fee waiver requirement for citizenship. Low income people cannot raise this kind of money. Citizenship for them is expensive enough.
560	USCIS-2010-0008-0686	Sompasong Keohavong	Please do not make change to the fee waiver policy. At the present, low income people may become US citizens or get their green cards because of the fee waiver assistance. Without it, they may not ever become US citizens and cannot vote, or they not may not get their green cards. Thank you.

ID	Comment.	Commentor	Comment
563	USCIS-2010-0008-0718	Matthew Horton	I wish someone could explain why this proposed change is a good idea. I read the email announcing the proposed policy change from USCIS several times, thinking that if I just read it enough times I would find the part where USCIS explained what is wrong with the current policy. But, there was nothing to explain the proposed change, other than that the use of the fee waiver among eligible people has been going up, which makes sense, given that N-400 applications to USCIS have also gone up during this period. Why would we want to fix something that is not broken? There is nothing wrong with the current system. What is the justification for the change? Maybe I'll go back and re-read the email from USCIS again, but I know there won't be an explanation. So, let's not go making a change if there's nothing wrong with the current system.

ID	Comment.	Commentor	Comment
565	USCIS-2010-0008-0696	Keeley Mathis, Seattle Goodwill Industries	<p>I am a social worker for Goodwill Job Training and Education Center. We offer a citizenship class for people wanting help to study for the exam and interview. I am regularly in conversation with adult students who are eligible for US citizenship but have not yet applied due to the high cost. One of our students has spent years working in farm labor while living in a trailer and caring for several kids as a single mother, including one with a major disability. It was not until she was enrolled in our program that she was made aware that the fee waiver exists-this overjoyed her because she had put off citizenship for years due to being unable to save up the \$725 to apply. She chose to see a lawyer for help with her citizenship application and fee waiver application-this cost \$300 but saved her the \$725 and gave her the peace of mind that she did everything right in English-her second language. Many LPR's spend hundreds or thousands of dollars paying lawyers to understand the process and get help to make sure their application is correct.</p> <p>If the process were to change to make the fee waiver more difficult to apply for, this student would have been set back considerably-both due to having to prove income again (after already having to do this with Department of Social and Health Services-another government agency) with pay stubs from a job that varies wildly in pay due to the seasonal surges and dips in work, and due to increased fear and uncertainty that this change would inflict on her. So many students at Goodwill come to me after hearing about possible changes to immigration laws on the news and become fearful of doing many of their regular activities. This change would cause chaos and fear in the immigrant community, which has a negative effect on everyone (ex: people stop calling the police even in case of emergency because they do not trust government entities). The change is inefficient-why double the verification process when DSHS or another gov entity has already verified? Overall, this proposed change is unnecessary, would cause fear and chaos for many immigrants who are here legally. It will also cause more work for USCIS and non-profit organizations who must step up to help the community understand how to navigate the complicated and intimidating government processes-it will indeed make my job harder! I am against this proposed change.</p>
567	USCIS-2010-0008-0727	Julie Cohen	<p>The proposed change makes it harder for immigrants to follow legal processes to apply for a Green Card. Do not penalize immigrants who are coming to the US to contribute by not giving them the ability to waive the expensive Green Card application fees. We should be making it easier for people to legally be here, not continually put up barrier after barrier. The US Government should put forth policies that support the real American Dream...coming to the US to contribute and make the country and the world a better place. This policy does not do that. I'd like to get a response.</p>

ID	Comment.	Commentor	Comment
568	USCIS-2010-0008-0679	Erlinda Lowenborg	I am strongly opposed for the proposed change in fee waivers, which will make it almost impossible for hundreds of thousands of legal permanent residents to become U.S. citizens...We should be setting people who come here for a better life for success not purposely taking away their ability to be afforded the benefits many of us were given without having to do anything but be born on U.S. soil.
569	USCIS-2010-0008-0712	Kathryn Hubbard	I am opposed to the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application. Thank you for taking the time to consider my views.
575	USCIS-2010-0008-0685	Joel Gombiner	I object to the elimination of the fee waiver. The foundation of American success is immigration, and this proposed rule makes immigration more difficult, with clear, negative implications for the vitality of our country and its economy. Let's not shoot ourselves in the foot with this poorly considered rule.

ID	Comment.	Commentor	Comment
587	USCIS-2010-0008-0707	Judith Southworth, Catholic Charities Maine	<p>Over the past 15 years I have served as a social worker and accredited immigration legal representative assisting elderly refugees to naturalize. Having come to their new home here in Maine with nothing, I consistently observe that our older New Mainers live simple lives in small apartments consuming little in comparison to their native-born counterparts. When I am preparing their naturalization applications they always express to me their deep gratitude for the safety and security that our country has provided and are always very focused on being approved for their citizenship.</p> <p>I want to strongly request that the Department of Homeland Security withdraw the proposed rule on fee waivers. This rule would cut off access to citizenship to elderly New Mainers who rely on a fee waiver to be able to apply to naturalize. By denying the use of means-tested public benefits as a qualifying factor, the rule would impair most of the elderly New Mainers who I am bound by the Federal Office of Refugee Resettlement to serve from naturalizing.</p> <p>State agencies already decide an individuals eligibility for public benefits based on their limited resources. These benefits are not generously given but reflect strict qualifying factors such that only the neediest qualify. Recognizing the receipt of public benefits as a basis for a fee waiver only makes sense and doesnt require USCIS to duplicate the qualification work already done by State agencies.</p> <p>I understand that in 2017, close to 40 percent of citizenship applicants applied for a fee waiver and most waivers were based on receipt of means-tested benefits. Over the past 15 years none of my elderly New Mainer clients, who have ranged in age from 60 to 92 years of age, have had the ability to pay the fee. I remember especially one 80-year-old Asian woman, living alone in a one-room apartment. She had been in Maine for over 20 years but had never applied to naturalize in part because of the cost. With the fee waiver she was able to apply. A friend of hers took a photo of her which is etched in my memory. It shows her, at age 81, proudly voting for the very first time as a newly naturalized citizen. It is for our elderly New Mainers, and all that they bring to their US families, and to our Maine communities, that I very strongly oppose the proposed rule and ask that DHS withdraw it.</p>
590	USCIS-2010-0008-0857	Dina Burstein	<p>I am against the proposed revision. I support the right of people of low income to apply for naturalization. Fees are very expensive, and I think there should be a broad array of options available to applicants to establish their need for a fee waiver. We should not be erecting barriers to naturalization.</p>

ID	Comment.	Commentor	Comment
611	USCIS-2010-0008-0815	Elena Perez	<p>o whom it may concern,</p> <p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>I find it puzzling that at a time when the administration is attacking undocumented individuals who are working hard and contributing to this country, you would create more barriers to those who want to be citizens and are doing everything they can to follow established procedures to become citizens.</p> <p>Please make no changes that make it even more difficult for individuals to formalize their commitment to this country via citizenship - it is an honor to have them.</p> <p>Sincerely, Elena Perez Seattle WA 98116</p>
612	USCIS-2010-0008-0943	Kiana McKenna	<p>I oppose this revision because immigrants with the lowest incomes rely on the current ways accepted to verify their income so they can apply for the fee waiver. Families, especially those with low incomes, should absolutely not be punished, which is exactly what would happen if the current verification methods were eliminated. Do not break the system even further. Making it harder for them to receive the fee waiver for citizenship is not the answer.</p>

ID	Comment.	Commentor	Comment
614	USCIS-2010-0008-0979	Gene Lee	<p>Rescinding the waiver is just another way of diverting / stopping needed funds.</p> <p>Whom gets hurt the most when there needs a budget cut? More often than not, low income people are affected the most...people who need assistance the most.</p> <p>Let's stop this lack of respect and lack of compassion now, starting with keeping the waiver.</p>
615	USCIS-2010-0008-0869	Isabel Khalili	<p>As a concerned citizen and the daughter of an immigrant, I oppose the proposed revision to the fee waiver process. It would deter the families that need it most from seeking life-saving basic supports including housing and healthcare. This is unethical and against the values of the United States. It tilts the scale even farther in favor of the rich, denying poor families a feasible path to citizenship and blocking their chance at progress in this country. This in turn denies the US of diverse and positive contributions to our economy and culture.</p> <p>The proposed regulation would make immigrant families afraid to seek programs that support their basic needs and which their tax dollars help support. This is dangerous and will result in increased poverty and negatively affect families well-being and long-term success.</p> <p>For these reasons, the Department should immediately withdraw its current proposal and dedicate its efforts to advancing policies that strengthen, rather than undermine, the ability of immigrants to support themselves and their families in the future. This is a country of immigrants, after all.</p>

ID	Comment.	Commentor	Comment
618	USCIS-2010-0008-0796	Raphaelita Arviso	Hello. There are so many adjectives which come to mind when considering this proposed change but none are good adjectives. It's mean, it's cruel, it's attacking people who are already poor, it's racist, it's an agenda of the trump administration as they try to make America more white, when it's NOT! We are a diverse nation and we benefit from the diversity. I DO NOT AGREE WITH THE PROPOSED CHANGES. Please leave them as they are currently. Leaving them as they are allows people to file for citizenship more easily, less barriers. I work with people who file citizenship and this is just another unnecessary barrier. If the reason for this barrier had more credibility then just being racist that would be different. But the agenda of the trump administration echoes back to a time where America is long past. We are no longer there and trump and his ilk are not going to take us back there. Please do not hurt people who are already poor.
623	USCIS-2010-0008-0880	Tim O'Neal	The proposed changes to the USCIS fee waiver eligibility will disproportionately affect individuals at the lowest rungs of our socioeconomic structure. Rather than facilitating upward mobility and beginning to reconcile the vast wealth inequality that currently exists, it will further exclude low-income individuals from having the opportunity to become US citizens and participate in the American Dream. This change will be harmful both to the individuals prevented from the potential to become citizens but also the country itself, as it continues to demonstrate hostility towards immigrants and refugees attempting to come to the US for a new chance at life.
624	USCIS-2010-0008-0920	Koang Kerjiok	Because lot of people don't have a job, they need a good job to pay there fee. But if lot of people need to have a job. They have come here to work, they pay tax, they work hard to better the country.

ID	Comment.	Commentor	Comment
627	USCIS-2010-0008-0893	Heather Hart	Please do not revise the fee waiver process for people to apply for citizenship, green cards, and other residency permits. My community is enriched by the presence of immigrants who would be negatively impacted by this revision, to the detriment of our community. I am opposed to this revision because of the extra barriers it will put on low income earners hoping to stay in our community.
630	USCIS-2010-0008-0992	Douglas Houck	I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.

ID	Comment.	Commentor	Comment
632	USCIS-2010-0008-0905	Dan Ross	<p>After a lifetime of leadership in the business world, I now volunteer with the Refugee and Immigration Services program of Catholic Charities Maine. Nothing in my private sector career has been so gratifying as providing families from around the world with the hope and opportunity that comes with American citizenship.</p> <p>The ability to pay should never be a barrier to participation in the economic, social and civic life of our great country.</p> <p>The proposed rule change on fee waivers would make it unnecessarily difficult for refugees and their families to use their energy and talents in ways that benefit all Americans. Conscientious state agencies have already carefully vetted their financial resources. Reverting to a complex, time-consuming and often redundant process will delay and sometimes prevent their ability to contribute positively to American society, and place an undue burden on U.S. government agencies and their workers.</p> <p>I have seen first-hand how Maines refugee and immigrant population has become a critical factor in the economy of an aging rural state which desperately needs more workers to maintain its growth and prosperity. I urge you to reconsider this rule change and support the continued economic vitality of Maine and the other United States of America.</p>
641	USCIS-2010-0008-0776	Charlie Moulton	I oppose this policy which serves no purpose other than preventing poor immigrants from becoming US citizens as they will not be able to afford the application fee without the fee waiver.
642	USCIS-2010-0008-0912	Mariellen Anderson	This creates a barrier that makes it more difficult to process applications. This is discriminating against low income applicants.

ID	Comment.	Commentor	Comment
652	USCIS-2010-0008-0930	Garner Moulton	The proposed change will result in low income immigrants who do not earn enough money to file income taxes to prove they are eligible for fee waiver. This creates a financial barrier that they most likely will be unable to overcome thus preventing them from applying for citizenship. I strongly oppose to this new policy.
675	USCIS-2010-0008-0782	Mara Moettus	<p>Hello, my name is Mara and I oppose this proposal. I volunteered to help immigrants obtain citizenship and saw first-hand how many people were given more opportunities to apply for citizenship under the fee waiver. I worked in a school serving a large immigrant population in Massachusetts, and I believe strongly that all immigrants should be given the right to apply for citizenship. Additionally, the proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p> <p>Thank you,</p> <p>Mara</p>
676	USCIS-2010-0008-0918	Frank James	<p>I am not in immigrant but I am sure that my forefathers immigrated to this country (USA) via slave ships. I oppose any measures that make it difficult for undocumented people to gain citizenship to this country. In addition I feel like it's unreasonable to ask the poorest among us to pay a fee ranging from \$500-\$1500.</p> <p>It's important because the lower the fee, the more people will come out of the shadows and become US citizen.</p>

ID	Comment.	Commentor	Comment
680	USCIS-2010-0008-0874	Malvina Gregory	I strongly oppose the proposed changes to the fees to become a citizen. Many people come here with nothing and pay large fees to win their residency. Asking them to pay large amounts for citizenship is just one more barrier to full participation in our society. Please dont punish people for just being poor. Our society needs all its voicesrich and low income alike. Its what makes us great.
681	USCIS-2010-0008-0916	Robert Maurus	<p>We already make it incredibly difficult for people to immigrate to this country. This country is built on immigrants and we still need these people. They make our country more vibrant and productive. Let's not make it more difficult but easier.</p> <p>Counter to current rhetoric they are honest tax paying and productive</p>
688	USCIS-2010-0008-0837	Jenny Sugilio	Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. There are many families who can not afford to pay the fee and will have a hard time paying for USCIS applications such as N-400 or I-90.
694	USCIS-2010-0008-0754	mergitu argo	I am from Ethiopia and when I become a citizen in 2000 the fee was only \$150 and now it is 725 it is to much for family's that need to apply so that can you please help this family's by lowering the fee. I work with the refuge and immigrant family and this is to much for them to pay for more than one person in the family.

ID	Comment.	Commentor	Comment
695	USCIS-2010-0008-0731	Laura Mendoza	<p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. This new barrier would only allow those immigrants who are wealthy and have a higher social status to become US citizens. I work as part of an organization that provides immigration legal services and many of our cases are similar. Older individuals who dream of becoming US citizens, a country in which they've spent the majority of their working lives. The main obstacle preventing them is the high cost of the application.</p> <p>The new proposal would make it difficult and would delayed the process even more as the number of people reviewing applications continues to be the same. Some people are waiting more than a year to become a US citizen, this new process for a fee waiver would create confusion and even more delays.</p>
696	USCIS-2010-0008-0882	Linda Okamura	<p>I strongly oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver.</p> <p>USCIS -do not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p>
717	USCIS-2010-0008-0832	Esperanza Borboa	<p>I am against the proposed changes to the naturalization fee waiver eligibility. If this change is enacted it will have a devastating impact on low-income immigrants. We are a nation of immigrants, our open and welcoming policies made us the country we are today. This proposal is backward thinking and sends the wrong message to people who desire to be citizens of our country.</p>

ID	Comment.	Commentor	Comment
718	USCIS-2010-0008-0848	Mengstab Tzegai	The proposed changes to the fee waiver eligibility process is a bad idea because it will be harmful to low-income refuge AND immigrants, many of whom are not earning e naff income, because luck of skills and e naff experience.they are even vulnerable to become homeless. This could result in their not applying to become U.S. citizens because they cannot afford the fee. Data shows that U.S. citizens earn more than green card holders. We should be doing everything that we can to make the fee waiver accessible to low-income refugees and immigrants.
785	USCIS-2010-0008-1122	Hanna Shephard	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
790	USCIS-2010-0008-1135	Diana Mukhamedvaleeva	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
810	USCIS-2010-0008-0962	Kathy Porter	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
839	USCIS-2010-0008-0749	Kristina Johnson	Please dont change the fee waiver program. I spent part of my Thanksgiving holiday at Ellis Island, reviewing the hardships immigrants already face. Almost all of us come from immigrant stock and almost all of us benefit from the work recent immigrants provide. Eliminating waivers or even changing the rules is likely to prevent those who most need a haven from being able to seek it here. Kristina Gurnsey Johnson

ID	Comment.	Commentor	Comment
856	USCIS-2010-0008-0794	Andrew Liu	<p>I am born and bred in the U.S. My immigrant wife, who still lives in Japan, may be one of the people impacted by the fee waiver prohibition. After years of paying for student loans, I was finally able to pay off my law school debt this year; but I lost my job in September of this year. I've been selling my stocks these past few months to keep afloat, but I may not be able to bring my American son, and soon-to-be American daughter over to the U.S., simply because of the sudden financial crunch at this time in my life.</p> <p>Immigrants are unquestionably good for the economy; and some of our top job creators came from immigrant families that were financially burdened.</p> <p>Do not remove the fee waiver option for citizenship.</p>
899	USCIS-2010-0008-0837	Jenny Sugilio	<p>Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. There are many families who can not afford to pay the fee and will have a hard time paying for USCIS applications such as N-400 or I-90.</p>
1013	USCIS-2010-0008-1115	Winnie Ye	<p>The Fee Waiver rule is cruel and a deliberate attempt to harm immigrants. Along with the public charge rule, the fee waiver rule is a coordinated attack against food, housing, and health care programs that immigrants and their family utilize and pay taxes to.</p>

ID	Comment.	Commentor	Comment
1158	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 11: B. The Proposed Form Change Disproportionately Impacts Services to Individuals in Under-Resourced Areas</p> <p>The impact on immigration legal services for under-resourced and rural communities will be especially profound. Many participants in group processing workshops in under-resourced areas qualify for fee waivers, and many depend on the receipt of means-tested benefits to prove their inability to pay the prescribed application fee. Numerous individuals in these remote areas will not have access to or knowledge of the new requirements to provide additional documentation to support their application for a fee waiver. Because of the shortage of legal service providers in these communities, the only time these individuals learn about the application process is often at a workshop. Under the proposed new form, legal service providers would need to dedicate additional time to each client, educating them about how to access IRS transcripts or other supporting documents to verify their income. We estimate that these changes would more than double the amount of time an application would take for a single client. This will limit the number of individuals service providers will be able to help, and the number of applications they will ultimately be able to complete at these workshops.</p> <p>The proposed changes are problematic not only because of the increased time it will take to serve each client, but also because the changes will limit the locations in which these workshops can be held. Workshops for under-resourced communities often take place in very remote areas with limited access to the internet. If an applicant needs assistance obtaining an IRS transcript to support their fee waiver application, applicants will have to delay their application process until they are able to visit the legal service worker at their organization's office, which may be hours away.</p> <p>V. Conclusion</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create insurmountable barriers for those seeking to secure their immigration status, particularly for those who participate fully in American</p>

ID	Comment.	Commentor	Comment
1191	USCIS-2010-0008-0770	Diane Narasaki (for ACRS)	<p>Comment part 2: The Proposed Changes Would Reduce Naturalization and Access to Other Immigration Services</p> <p>Unfortunately, by imposing additional burden on applicants, the entities that assist them, and USCIS and other state and federal agency staff, the proposed changes to the fee waiver application process would severely limit naturalization and impair the productivity of the many foreign-born residents of Seattle, King County, and Washington State. ACRS strongly opposes this threat to economic and social progress in our community.</p> <p>Receipt of a means-tested benefit is the most straightforward and the least labor-intensive method of proving inability to pay USCIS fees, because it leverages analysis that other government agencies have already completed of individuals’ income and other relevant circumstances. Forcing fee waiver adjudications to instead consider extensive original documentation of the many factors that determine income or hardship will hinder applicants and slow USCIS’s decision-making process, exacerbating the already-sizable backlogs of applications. Requiring submission of a Form I-912 and supporting documentation from every applicant – even those applying simultaneously with identically-situated family members – will have the same negative effects.</p> <p>Over the past 22 months, ACRS has assisted 1,295 clients to submit their N-400 applications. Of that, 64% (or 825 clients) were eligible for the full fee waiver. Of the 825 clients who were eligible for the fee waiver, 55% (or 450 clients) used the means-tested benefit letter to prove their eligibility. If this proposal goes into effect, it will become significantly more difficult for our clients to demonstrate their eligibility for the fee waiver. This is because a significant portion of our clients do not file income taxes because they are not legally required to do so. According to the IRS, a married couple filing jointly is only required to file federal income taxes if they earned more than \$20,800 per year. Yet, the same family is eligible for the fee waiver if their income is less than \$24,690 per year. This creates a large category of clients—those earning less than \$20,800 per year, who are eligible for the fee waiver but would be unable to prove it under the new policy guidelines. This proposed change would create a huge burden on ACRS’ naturalization staff to work with these clients to encourage them to file income taxes, even though they aren’t legally required to do so. It would place a considerable burden on our staff to refer clients to high quality/free income tax preparers. It would also place a considerable burden on our staff to steer clients away from high priced and/or predatory income tax preparation services which are not uncommon. It also places vulnerable elderly and/or disabled clients at risk if they share their personal information with non-reputable tax preparers. Furthermore, we will need to make appointments for some clients to go to the IRS to get a verification of non-filing letter from the IRS, but it is our understanding that this letter proves that the individual did not file their taxes, not what their income is. It will also create an additional burden on the IRS to provide appointments and documentation for individuals that are not legally required to file federal income taxes.</p> <p>If this policy change goes into effect, ACRS anticipates that fewer low-income immigrants will apply for naturalization because they will be unable to prove their eligibility for the fee waiver. They will remain in the United States as LPRs, but they will not become citizens. This will have an overall negative impact because our clients increase their self-sufficiency and contributions to society when they are able to pursue citizenship or other benefits regardless of their present ability to pay fees. This policy change is short-sighted in that it will trigger a whole host of negative unintended consequences – from lower economic self-sufficiency to</p>

ID	Comment.	Commentor	Comment
1222	USCIS-2010-0008-0739	Issa Ndiaye, West African Community Council	<p>Commpet part 2: The Proposed Changes Would Reduce Naturalization and Access to Other Immigration Services</p> <p>Unfortunately, by imposing additional burden on applicants, the entities that assist them, and USCIS and other state and federal agency staff, the proposed changes to the fee waiver application process would severely limit naturalization and impair the productivity of many foreign-born residents of The West African Community in Washington State. We strongly oppose this threat to economic and social progress in Washington state and the greater community of immigrants.</p> <p>Receipt of a means-tested benefit is the most straightforward and the least labor-intensive method of proving inability to pay USCIS fees, because it leverages analysis that other government agencies have already completed of individuals' income and other relevant circumstances. Forcing fee waiver adjudications to instead consider extensive original documentation of the many factors that determine income or hardship will hinder applicants and slow USCIS's decision-making process, exacerbating the already-sizable backlogs of applications. This would lead to the opposite of administrative efficiency. Requiring submission of a Form I-912 and supporting documentation from every applicant – even those applying simultaneously with identically-situated family members – will have the same negative effects. When the fees for naturalization or immigration benefits increase, our clients have tended to delay applying to the benefit because immediate costs for food, shelter, caring for their family members daily trump applying for the benefit. In the past, we have submitted the food stamp benefit letter as proof. This new process would make it more challenging for families who are already struggling prove that they qualify.</p>

ID	Comment.	Commentor	Comment
1228	USCIS-2010-0008-0779	Melissa Mora, Neighborhood Defender Service of Harlem	<p>Comment part 2: A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles. The increased requirements and additional evidence to be collected from applicants on the proposed amended Form 1-912 will extend the time and work required for applicants to complete (and adjudicators to process) the form. Requiring the additional documents will serve as a deterrent to applying for immigration benefits or naturalization. The proposed changes make the form more complex and will likely lead to individuals making more mistakes, adding to the processing time of the application and further adding to the deterrent effect of these changes. In some cases, applicants may not be able to complete the form because of a lack of required documents.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. By limiting the ways a person can</p>

ID	Comment.	Commentor	Comment
1289	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 7: The proposed rule change would directly harm low-income immigrants.</p> <p>While some clients would suffer nothing more than a delay in filing their immigration cases if this rule change goes into effect, many others will experience direct harm. Many clients, if they are unable to obtain the documentation necessary to support an income- or hardship-based fee waiver request, will be forced to take out a high-interest loan. Some clients will be forced to choose between paying an application fee and paying their other bills. Some applicants will have no choice but to give up on their applications because their fixed incomes do not allow them to save for a filing fee or pay back a loan. Among NCC clinic and workshop applicants who do not end up filing their naturalization applications, the top reason cited is not having enough money to pay for the filing fee.</p> <p>Our partner agencies described specific ways their clients would be harmed:</p> <p>"This will affect almost all our clients. It will lengthen the time it takes to prepare their applications, and will make gathering all the necessary documents needed more time consuming and confusing. This will add stress and a potential barrier for many of our clients, potentially causing some to not move forward with their applications or having to use money essential to the well-being of their families."</p> <p>"People significantly delay filing their cases because they are waiting to save money or find it, borrow it from family, etc."</p> <p>"Cases are on hold because clients are sometimes not able to find certain documents to prove the financial hardship part."</p> <p>Delays in submitting a naturalization application are more than a mere inconvenience: they delay the client's ability to vote, submit petitions for family members, and obtain certain types of employment. The proposed rule will cause applicants to be delayed in filing their applications, not only from the time needed to obtain additional evidence in support of an income- or hardship-based fee waiver, but also from waiting longer to receive legal services at a nonprofit agency with reduced capacity due to the burden of this rule.</p> <p>Some NCC agencies assist clients with gross cash renewals (Form 1-90) when a client is not ready to</p>

ID	Comment.	Commentor	Comment
1295	USCIS-2010-0008-1001	Kevin Herrera, The Sargent Shriver National Center on Poverty Law (“the Shriver Center”)	<p>Comment part 2: II. The Proposed Change Would Dissuade Eligible Individuals from Submitting Applications</p> <p>Beyond challenges the proposed rule will pose to USCIS personnel, changes to the fee waiver policy will harm eligible individuals seeking agency services ranging from basic identification documents to major events like obtaining citizenship through naturalization. With application fees ranging from around \$500 to over \$1000, reducing the number of people who qualify for a fee waiver means that low-income applicants will no longer be able to afford to apply, foregoing important benefits solely because they are no longer financially feasible. Reductions in applications and related reductions in services delivered by USCIS will impact the stability and economic security of directly impacted individuals and their families and will also produce negative effects for the United States as a whole.</p> <p>The proposed rule would dissuade eligible individuals from seeking to become citizens through naturalization because of financial barriers that could otherwise be overcome through a fee waiver. Studies show that a significant number of people eligible for naturalization cannot apply because of the cost of fees.⁵ This number will increase if fee waivers become more difficult to access. Research also confirms that the reverse is true: when fees are removed as a barrier, rates of naturalization nearly double.⁶ Even where applicants for naturalization would remain eligible for a fee waiver because they fall within the relevant FPL limit, requiring submission of additional evidence of assets and income – instead of a simple indication of receipt of means-tested benefits – would make applying unnecessarily cumbersome. This added complexity and uncertainty in predicting the outcome of a subjective adjudication will inevitably dissuade potential applicants from applying and will result in rejections for people who do not understand what they should submit.</p> <p>The benefits of naturalization, both for the individual and for the United States, are numerous and well-documented. Naturalizing increases a person’s earning power by 8 to 11 percent, regardless of industry, occupation, or length of residence in the United States.⁷ Similarly, becoming a citizen</p> <p>increases employability, increasing the employment rate among people born abroad by 2.3%.⁸</p>

ID	Comment.	Commentor	Comment
451	USCIS-2010-0008-0557	Lorna Velasco	<p>FEE WAIVER ELIGIBILITY is BAD Public Policy and I DISAGREE with this change. This process is an obstacle and makes it harder for individuals to apply for green cards and eventual citizenship. It is hard enough for many low-income families to apply for a green card, taking out the time tested benefits as a way to prove low-income status that has been vetted by government institutions will be another obstacle.</p> <p>My family comes from a low-income background, but we have persevered to become US citizens, I have siblings who have served in the military, this policy would have made it difficult for my family to apply citizenship if it were applied when we were growing up.</p> <p>Do the work of helping families towards a path for citizenship and NOT make it harder for all of us.</p>
523	USCIS-2010-0008-0643	John Langston	<p>I urge you to reconsider the proposed change in the regulations to waive immigration fees. The currently verified method of proving income by means-tested benefit is straightforward and effective. Why change that? This proposed change would only make it harder for qualified low-income people to apply for citizenship. The argument that because income levels used to determine means-tests vary from state to state there must be a change is simply false. Of course these eligibility levels vary because cost of living varies from state to state. This is not inconsistency but rather common sense! This country has been built by hardworking and often poverty-stricken immigrants, and the proposed change appears to be a thinly-veiled attempt to make the dream of a better life off-limits to people like this today for shame!</p>

ID	Comment.	Commentor	Comment
525	USCIS-2010-0008-0625	Noelle Lemon	<p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 205292140</p> <p>Dear Ms. Deshommes:</p> <p>There are 25 separate immigration applications, including, but not limited to, the application to file an appeal, the application for Suspension of Deportation and the application to Naturalize, which are affected by this rule. The impact I am concerned about is that many fewer low income persons will be able to remain safely in the United States or gain the right to vote.</p> <p>Our country was founded on the principles of equality and by the hard work of immigrants and this proposed rule will work against what makes our country great. We need immigration applications to remain accessible for low income immigrants and this means not allowing this proposed rule to pass. If this rule were to pass it would ensure that only wealthy persons can remain in the U.S. and get the vote and it harms mixed status (families where there are U.S. citizen children, for example, and an immigrant parent) low income families.I am also concerned that immigrants who are experiencing unemployment will be harmed by this proposed change, as they are less likely to have proof of their financial hardship by not having proof of income, etc.</p> <p>Receiving means-tested benefits should serve as proof that one is going through financial hardship. We need to continue to protect hardworking immigrants with incomes just above 150% of the Federal Poverty Guideline.</p> <p>Sincerely, Noelle Lemon</p>

ID	Comment.	Commentor	Comment
526	USCIS-2010-0008-0672	Marilyn McAllister	<p>I am writing to oppose proposed changes to the fee waiver requirements for immigrants who are applying for US citizenship. The fees involved in applying for citizenship are are burdensome for low-income immigrants. Making the fee waiver process more arduous clearly raises the barrier for those who are making their best efforts to become our newest citizens.</p> <p>Current processes for allowing applicants to use a letter from the state verifying that they are receiving means tested public benefits must remain in place. Forcing immigrants to produce tax returns that they may not be required to file is simply an illogical and unnecessary barrier.</p> <p>As a nation we must make the citizen process more available and achievable, not less. We are, and must continue to be, a nation of immigrants.</p>

ID	Comment.	Commentor	Comment
555	USCIS-2010-0008-0729	Steven Denton	<p>I am against the proposed change of eliminating the means-tested benefit category from the Form I-912, Request for Fee Waiver. The Form I-912 is meant to allow individuals who receive means-tested benefits, are beneath 150% of the federal poverty guidelines, or experience financial hardship to obtain a waiver of immigration fees. This proposed change does not eliminate the last two of these grounds.</p> <p>The receipt of means-tested benefits such as SNAP and Medicaid, for which many lawful permanent residents who are applying for citizenship are eligible, is merely a streamlined way to validate that this individual falls beneath 150% of the poverty guidelines, as another government entity has already confirmed this through the issuance of these benefits. Again--it is only a method to confirm a ground of eligibility which is not proposed to be eliminated.</p> <p>Removing this ground of eligibility on the Form I-912 does not prevent these individuals from accessing these benefits, it only makes the process of applying for the fee waiver more difficult for the individual--as many of these applicants do not earn an income great enough to legally require them to file tax forms which are the most common evidence used in approving the income-based ground and would therefore struggle to show that they fall under this threshold--and for the government--as verifying the receipt of these benefits is a much easier and more streamlined task than to go through tax returns and other proof of income.</p> <p>This proposed change appears to be only another scare tactic to discourage immigrants from accessing benefits for which they are eligible AND a means to slow down the processing of fee waiver applications.</p> <p>I strongly oppose this change.</p>
558	USCIS-2010-0008-0703	Jan Stephens	<p>This rule is unnecessary as all low income immigrants already prove that they are low income by qualifying for public assistance. No further documentation needs to be required. I urge you not to impose any additional burdens on low income immigrants who are trying to qualify for a fee waiver as part of their US Citizenship Application.</p>

ID	Comment.	Commentor	Comment
578	USCIS-2010-0008-0717	Bridgette Gomez	<p>I urge the DHS to withdraw this proposed rule on fee waivers. This would stop many people from becoming citizens, people who are eligible immigrants due to the high costs of application fees. This will create a barrier for many.</p> <p>There is no need for USCIS to to have to adjudicate what state agencies have already determined, that is applicants lack of resources and eligibility for public benefits. The rule doesn't to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications, that please in major cities like NYC or Chicago that have many immigrants will be impacted. This will target and negatively impact low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>This proposed rule has the potential to impact approximately 244,000 immigrants who have the opportunity to obtain citizenship and the right to receive fair and equal treatment from USCIS. It will also increase the overwhelming backlog of over 750,000 citizenship applications before the agency, extend waiting times for those applicants, which has already recently doubled, or worse, deter eligible immigrants from applying.</p> <p>Adding barriers to becoming citizens would prevent immigrants ability to integrate into the country, access higher economic and educational opportunities, and ultimately harms us all. Instead of placing barriers to citizenship, the federal government should encourage immigrants to apply for citizenship and stimulate the economic benefits that that creates for all. This is why I strongly oppose the proposed rule and call on DHS to withdraw it and maintain the ability of applicants to receive a fee waiver by showing that they receive a public benefit.</p>

ID	Comment.	Commentor	Comment
607	USCIS-2010-0008-0755	Kaitie Dong	<p>My name is Kaitie Dong. I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I work at OneAmerica, a power building organization that works to generate power within immigrant and refugee communities through community organizing, citizenship clinics, and English Innovation classes. I work at OneAmerica because I am the daughter of a family of immigrants, my community is beautifully composed of immigrant and refugees, and I firmly believe that migration is a human right. Immigrant and refugees contribute to vibrancy and the life of our community and they have every right to become a member of the United States.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reason: The regulation says that someone should obtain their wage transcripts from the IRS as proof of income. However, in order to obtain a wage transcript online, you have to have a credit card, a vehicle loan or a mortgage for identification purposes. The vast majority of low-income applicants we serve do not have any of those, and would have to request their transcript by mail, which takes 5-10 business days. Low-income immigrants at our workshops at OneAmerica are unlikely to come prepared with all the required income documentation, and they would have to get fee waiver assistance elsewhere.</p> <p>Why are we making it more difficult to become a member of our community? Why are we punishing those who need assistance rather than supporting them? In addition to making it more difficult to get fee waiver assistance, failure to naturalize weakens the possibility of family reunification. Not only does the revision to the Fee Waiver create a greater obstacle to obtaining green cards and assistance, but it perpetuates family separation. It will continue to tear families apart. We must oppose the revision to the Fee Waiver because immigrants are what America great and we must make America accessible and welcoming for them.</p>

ID	Comment.	Commentor	Comment
608	USCIS-2010-0008-0927	Jennifer Healey	<p>I write to oppose the proposed revision to eliminate the means-tested benefit ground for Form-912 (OMB Control Number 1615-0116, Docket ID USCIS-2010-0008).</p> <p>First, this ground allows for federal government efficiency. All recipients of means-tested benefits received financial screenings at the local or state level, and were (already) found to be in need of government assistance. A duplicative screening at the federal government level is unnecessary. It is wasteful for federal employees/contractors to perform screenings (at higher salary levels) that have already been completed by other government employees.</p> <p>Secondly, eliminating this ground will cause evidentiary burdens on both the applicant and the adjudicator. Individuals submitting Form I-912 often work jobs where their employers are hesitant to leave "paper trails" (for fear of liability arising from employing people without work authorization). As a result, documentary evidence--like pay stubs--often does not exist. This creates an undue burden on both the applicant and the adjudicator, and having an additional ground (such as the mean-tested benefit ground) is worthwhile in light of such evidentiary limitations.</p> <p>Under the "Reason for Changes" portion of the proposed revision, an explanation about varying requirements--nationwide--for means-tested benefits is provided. However, the cost of living varies widely across the many regions that exist in the United States. An inevitable result of that reality is that means-tested benefits have different requirements around the country. For the same reason, federal government employees are paid vastly different salaries--for the same job duties--depending on where they reside in the United States. This proposed revision is not an effort to standardize procedure, but rather a pretextual attempt to prevent a pathway out of poverty for millions of vulnerable people in the United States.</p>

ID	Comment.	Commentor	Comment
609	USCIS-2010-0008-0732	Andrew Huntington	<p>It's time that the USA started being a world leader in caring for the vulnerable. These fees need to be waived in an easy manner. Putting road blocks in will only make people's lives harder and these are the people who need our support. Many of them are already struggling to make ends meet and keep their families together, so when we make it harder to get fees waived then we are hurting actual humans. And for what?! I oppose the proposed public charge rule that would deter thousands of families from seeking life-saving basic supports.</p> <p>The receipt of non-cash benefits has never been and should not now be a factor in determining whether an individual is likely to become a public charge.</p> <p>The proposed regulation would makeand has already madeimmigrant families afraid to seek programs that support their basic needs. The proposal could prevent immigrants from using the programs their tax dollars help support, preventing access to healthy, nutritious food and secure housing. It would make poverty worse by discouraging enrollment in programs that address health, hunger and economic security, with profound consequences on families well-being and long-term success.</p> <p>The fear created by these rules would extend far beyond any individual who may be subject to the public charge test, harming entire communities as well as the infrastructure that serves all of us. Community providers have already reported changes in healthcare use, including decreased participation in Medicaid, SNAP, and other programs due to community fears stemming from the leaked draft regulations</p> <p>For these reasons, the Department should immediately withdraw its current proposal and dedicate its efforts to advancing policies that strengthen--rather than undermine-- the ability of immigrants to support themselves and their families in the future.</p> <p>Thank you for your time.</p>

ID	Comment.	Commentor	Comment
617	USCIS-2010-0008-0810	Maya Nojechowicz	<p>I believe that receiving means-tested benefits should serve as proof that one is going through financial hardship. I believe that we should continue to protect hard-working immigrants with incomes just above 150% of the Federal Poverty Guideline, in addition to those with no income or income below 150% of the FPL. I am also concerned that immigrants who are experiencing unemployment will be harmed by this proposed change, as they are less likely to have proof of their financial hardship by not having proof of income, etc. The same goes for immigrants who are employed, but whose employers may not be willing to provide them with a letter or proof of income due to the chilling effect of this administration's harsh immigration policies. In addition, the poverty level is not consistent across U.S. states since the cost of living is not consistent across the states, so the FPL is not a justified method of determining who should qualify for a fee waiver.</p> <p>This new policy will harm low-income and poor immigrants, essentially barring them from being able to access a legal means to adjust their immigration status for which they are otherwise eligible. No one should be punished for their level of income if they truly do otherwise qualify for an immigration benefit.</p> <p>There is no current issue around the adjudication of fee waivers, so this new policy is unnecessary. It will only complicate an already convoluted immigration process, slow down adjudicating time, and bar qualified immigrants from naturalizing in this country. I strongly oppose the passage of this USCIS proposal.</p>

ID	Comment.	Commentor	Comment
640	USCIS-2010-0008-0807	Kyle Dignoti	<p>Greetings,</p> <p>I am writing in opposition to the proposed revision of USCIS fee waivers and exemptions. This proposal would greatly limit access to citizenship in the Tucson community, where many immigrant residents rely on public benefits to keep their families safe and healthy. It greatly burdens individuals who are unable to pay from immigration benefits they are well-qualified to receive. The cost of citizenship fees continues to rise with an increase of over 600% in the last 20 years. These dramatic increases bar qualified lawful permanent residents from citizenship, in many cases. This unfair proposal targets the poorest and most vulnerable of our immigrant neighbors. Receipt of public benefits already demonstrates inability to pay high fees. Therefore, the proposed change is unnecessary.</p> <p>I would urge USCIS and the Regulatory Coordination Division to consider the harmful consequences this proposed change will unleash on our communities. Please keep means-tested benefits available to our most-vulnerable individuals and refrain from changing fee waiver eligibility. Thank you.</p> <p>Kind regards, Kyle Dignoti</p>

ID	Comment.	Commentor	Comment
643	USCIS-2010-0008-0827	How Yu Chung	Because the majority of the modern American are the children, or children of children of immigrants, I strongly oppose the Fee Waiver rule because it is a proposal being made in the middle of an ill informed attack on immigrant communities. To denying means-tested benefit fee waivers and and to only accept income-based fee waivers hurts people who are unemployed, underemployed, unable to work, or retired. The value of all human life is undeniable. We are all equal. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. It is simply unfair, unjust, and a misdirected attack on struggling people.

ID	Comment.	Commentor	Comment
658	USCIS-2010-0008-0759	Varisha Khan, OneAmerica	<p>My name is Varisha Khan. I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. My parents are immigrants to the US who have worked hard to achieve the American dream through hard labor and education and raising a family on strong morals and family values and the importance of giving back to society. In my family alone, naturalized citizens have become award-winning and successful journalists, doctors, lawyers, engineers, chefs, business owners, veterans, law enforcement officers, and even elected officials who serve their cities every single day. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons:</p> <p>Naturalizing makes people less likely to need public benefits, but prohibiting applicants to use proof of public benefits to qualify for the fee waiver will make them less likely to be able to naturalize. Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages, than their non-naturalized foreign-born peers. Naturalization, on average, accounts for an 8-11% increase in wages, which results in higher spending and state and local taxes paid. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply.</p> <p>If our taxes are already paying state or local benefits-granting agencies to thoroughly verify household income for those applying for benefits, why does USCIS want to redo this work? USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed, especially when N-400 processing times are at a historic high.</p> <p>Naturalizing creates a pathway for a stronger economy, a stronger nation of values and holds America in its place as the Beacon on a Hill for all to model and aspire to become.</p> <p>Please, as someone who is proud to be an American because of the accessibility of the naturalization process, I urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008.</p>
659	USCIS-2010-0008-0864	Sarah Flaherty	<p>If someone is too poor to pay for food to eat, they are clearly too poor to pay this fee. Receiving legal status should not be limited to those who have the financial means to pocket the administrative costs. Why make this more difficult and complex when receiving asylum is already a trying enough process? Proof of being on food stamps is certainly proof enough of being too poor to pay this fee.</p>

ID	Comment.	Commentor	Comment
667	USCIS-2010-0008-1005	Ellen Fitzsimmons	<p>I strongly oppose the proposed changes to the fee waiver requirements for immigrants.</p> <p>USCIS is proposing to discontinue receipt of a means-tested benefit as a basis to qualify for a fee waiver. This means that many Lawful Permanent Residents who cannot afford the \$725 filing fee to become citizens would instead have to undergo a much more onerous review of financial hardship and/or income below the poverty guidelines. Taking away this criterion will make it harder for vulnerable and low-income immigrants to become U.S. citizens.</p>
673	USCIS-2010-0008-0780	Jody Mashek	<p>am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>As a DOJ Accredited Representative working for a non-profit organization that provides low-cost and free legal services to immigrants from all over the world who now call the United States their home, I know that the proposed policy would negatively impact the communities I serve.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle when seeking an immigration benefit. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship.</p> <p>Additionally, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility.</p> <p>The proposal eliminates an individuals ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.</p> <p>Our office regularly assists elderly immigrants with their naturalization applications. Many of these immigrants were resettled in the U.S. as refugees. Most of them are highly dependent on monthly SSI benefits that they receive as well as SNAP benefits. Their SSI benefits stop, however, after acquisition of permanent residency.</p>

ID	Comment.	Commentor	Comment
674	USCIS-2010-0008-0747	Kristen Navaluna	<p>My name is Kristen and I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at citizenship clinics 4 times. I help at these workshops because the process to apply for citizenship is complicated and scary - and through these clinics we're able to provide support and give confidence to those wanting to become a citizen. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I teach immigrant and refugee students who are low-income and if this passed they wouldn't be able to apply for citizenship. I oppose the rule for these reasons: I volunteer at the WNA clinics because they fill the gap in legal services for low income clients. But we just meet with clients for the one day. Demand for services is high and we dont have the time or resources to document income in the way the proposed regulation would require. We would end up serving fewer people. We would have to refer these people out who cannot afford legal services, and they may end up not applying at all.</p>

ID	Comment.	Commentor	Comment
683	USCIS-2010-0008-0784	Susan Blank	I oppose the proposed change to the processing of Form I-912 for fee waivers (USCIS 2010-0008, OMB Control #1615-0116). Eliminating receipt of public benefits as a valid criterion for fee waiver forces applicants for the waiver to undergo a much more complicated and onerous process of establishing that their income levels warrant the waiver. This moves the process in the direction of making it more difficult, not easier, for legal immigrants to become citizens. I actually think that charging any more than a nominal fee for citizenship application is a misguided policy, but certainly the new proposed rule will further narrow the gateway to citizenship. My husband has taught classes for legal immigrants to prepare them for the citizenship exam and found the students deeply committed to the effort to become citizens. Our country should do everything possible to encourage legal immigrants like those students to further knit themselves into the fabric of our country by becoming citizens.
684	USCIS-2010-0008-0838	Jennie Spector	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. The fees are exorbitant and for those with an income it is still difficult to afford. Do not allow the fee waiver to be removed making it impossible for those who cannot afford the exorbitant fees unable to apply for citizenship, residency and other ways to remain in the country legally.

ID	Comment.	Commentor	Comment
686	USCIS-2010-0008-0958	Jenna Ripke	<p>I am submitting this comment to express my opposition to removing the means-tested benefit as an eligibility ground for a fee waiver. Currently, immigrants are eligible for a fee waiver if they (or their parents) receive means-tested benefits, their household income is below 150% of the poverty line, or they have a financial hardship. Removing the means-tested benefit eligibility ground will make it much more difficult for low-income immigrants to qualify for a fee waiver.</p> <p>First, there are specific classes of immigrants who are entitled to receive certain public benefits because they are low-income. These are the very types of immigrants the fee waiver is intended to benefit. Removing the means-tested benefit as an eligibility ground will make it more difficult for these immigrants to apply for immigration benefits for which they qualify, as they will have to go through the more arduous test of showing financial hardship.</p> <p>Second, means-tested benefits are generally only granted to people who are already low-income. For example, Medicaid is available for individuals whose household income is below 133% of the poverty line. Although a determination by the benefit-granting agency is not binding on USCIS' determination of whether an immigrant qualifies for a fee waiver, receipt of means-tested benefits is very persuasive evidence that they are low-income and unable to pay the USCIS fee, and should be sufficient for fee waiver purposes. Returning to the example of Medicaid, the fact that an immigrant is receiving Medicaid means that their household income is below 133% of the poverty line - this is well below the 150% of the poverty line necessary to demonstrate fee waiver eligibility, and therefore is sufficient on its own.</p> <p>Finally, the process of demonstrating financial hardship for the purposes of a fee waiver is a very fact-intensive process. Immigrants may have difficulty navigating this process, and it will lead to immigrants not applying for benefits that they are eligible for (such as naturalization). It is worth noting that immigrants who do go through this onerous process will often use means-tested benefits as evidence of financial hardship - if they will be submitting this evidence anyway, why can they submit it as stand-alone evidence that they qualify for a fee waiver?</p> <p>Ultimately, removing means-tested benefits as an eligibility ground for a fee waiver will result in more financial hardship to immigrants as they are forced to choose between paying a fee they cannot afford or not applying for immigration benefits for which they are eligible. This is another unnecessary roadblock in the already complex and time-consuming immigration process. For all the reasons stated above, I am strongly opposed to removing the means-tested benefit as a fee waiver eligibility ground.</p>

ID	Comment.	Commentor	Comment
701	USCIS-2010-0008-0829	Jeanine Hays	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. Ending the fee waiver will hurt immigrant communities. The fee waiver must remain in place to allow people to be able to apply for citizenship.
704	USCIS-2010-0008-0963	Debora Gish	As a U.S. Citizen who has received means-tested benefits in the state of California in the past, and knows the arduous process of proving income to qualify for services, it seems that this proposed change would only serve to deny the fee-waiver benefit to applicants residing in states with a higher cost of living. Why repeat the work of local agencies? What a person can afford greatly depends on the cost of living in balance with income. Both of these vary from state to state. In addition, this will create another unnecessary hurdle to U.S. Citizenship to eligible applicants and an overt bias against poorer, working class immigrants, creating another defacto form of voter suppression. Please do not eliminate receipt of means-tested benefits as a measure of granting fee-waivers to applicants.

ID	Comment.	Commentor	Comment
713	USCIS-2010-0008-0870	Michael Hotard	<p>I oppose the proposed changes to Form I-912 used to collect information for the Federal Fee Waiver program. The changes proposed are not justified in the Proposed Notice and would unnecessarily increase the public burden of completing the form. USCIS does not provide accurate burden calculations based on the new instructions. It likely that the new form will increase the burden for individuals, result in fewer total applications, and actually increase the arbitrariness of the process rather than standardize it.</p> <p>Please see the attached statement for further details. Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>I oppose the proposed changes to Form I-912 used to collect information for the Federal Fee Waiver program. The changes proposed are not justified in the Proposed Notice and would unnecessarily increase the public burden of completing the form. USCIS does not provide accurate burden calculations based on the new instructions. It likely that the new form will increase the burden for individuals, result in fewer total applications, and actually increase the arbitrariness of the process rather than standardize it.</p> <p>USCIS writes that “the proposed revision would reduce the evidence required for Form I-912 to only a person's household income and no longer require proof of whether or not an individual receives a means-tested benefit. USCIS policy since 2011 has been to permit a fee waiver where an applicant received a means-tested benefit, even for a short period of time. USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver. Therefore, the revised form will not permit a fee waiver based on receipt of a means- tested benefit, but will retain the poverty-guideline threshold and financial hardship criteria.”</p> <p>While it is true that USCIS is removing the criteria for means-tested benefits from Form I-912, they are also making changes to the income documentation required for those trying to show that they meet the income criteria for the fee waiver. USCIS does not discuss why these changes to documentation are necessary. Overall, these changes make the income verification process more difficult and make it less likely for someone to successfully show that their income meets the requirements. USCIS does not demonstrate that the current income requirements are inadequate.</p> <p>Below, I discuss the specific changes made and why they would likely increase the burden on the public.</p>

ID	Comment.	Commentor	Comment
722	USCIS-2010-0008-0940	Lydia Sinkus	<p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>In my professional capacity as an attorney, I work with many clients who must rely on fee waivers in order to access legal protections to which they have fundamental rights. It is often difficult for low-income clients to gather evidence of their financial status. For these clients, proving annual income takes significantly more time than demonstrating receipt of means-tested benefit. Limiting forms of proving eligibility would inhibit access changes in legal status that could help these individuals continue to build financial stability and prosperity.</p> <p>Current fees for immigration applications are cost-prohibitive for many individuals with whom I interact, who provide for their families, but lack additional disposable income. Fee waivers often make it possible for these individuals to naturalize and obtain better paying jobs and make additional contributions to their families and communities.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create a particular additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. This is an overall drain on our resources as a country.</p> <p>If USCIS were to make any changes to the fee waiver form, I urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p>

ID	Comment.	Commentor	Comment
1147	USCIS-2010-0008-1093	Ellen Katz, William E. Morris Institute for Justice	<p>Comment part 3: II. The Proposed Change Would Dissuade Eligible Individuals from Submitting Applications</p> <p>Beyond challenges the proposed rule will pose to USCIS personnel, changes to the fee waiver policy will harm eligible individuals seeking agency services ranging from basic identification documents to major events like obtaining citizenship through naturalization. With application fees ranging from around \$500 to over \$1000, reducing the number of people who qualify for a fee waiver means that low-income applicants will no longer be able to afford to apply, foregoing important benefits solely because they are no longer financially feasible. Reductions in applications and related reductions in services delivered by USCIS will impact the stability and economic security of directly impacted individuals and their families and will also produce negative effects for the United States as a whole. The proposed rule would dissuade eligible individuals from seeking to become citizens through naturalization because of financial barriers that could otherwise be overcome through a fee waiver. Studies show that a significant of people eligible for naturalization cannot apply because of the cost of fees.⁴ This number will increase if fee waivers become more difficult to access. Research also confirms that the reverse is true: when fees are removed as a barrier, rates of naturalization nearly double.⁵ Even where applicants for naturalization would remain eligible for a fee waiver because they fall within the relevant FPL limit, requiring submission of additional evidence of assets and income – instead of a simple indication of receipt of means-tested benefits – would make applying unnecessarily cumbersome. This added complexity and uncertainty in predicting the outcome of a subjective adjudication will inevitably dissuade potential applicants from applying and will result in rejections for people who do not understand what they should submit. The benefits of naturalization, both for the individual and for the United States, are numerous and well-documented. Naturalizing increases a person’s earning power by 8 to 11 percent, regardless of industry, occupation, or length of residence in the United States. C</p>

ID	Comment.	Commentor	Comment
710	USCIS-2010-0008-0783	Crystal Komm	<p>Comment RE: OMB Control Number 1615-0116, Docket ID USCIS-2010-0008.</p> <p>The Agency states that "the proposed revision would reduce the evidence required for Form I-912 to only a person's household income and no longer require proof of whether or not an individual receives a means-tested benefit." The Agency would have the public believe that by eliminating the means-tested benefit standard, they are reducing the evidence required by applicants to obtain the fee waiver and simplifying the process. This is patently untrue, and at best misleading. Rather, eliminating the fee waiver for recipients of means-tested benefits will increase the burden on the Agency, fee waiver applicants, and legal service providers.</p> <p>Currently, an applicant need only prove receipt of a means-tested benefit or that their household income meets the standard, not both. Applicants receiving a means-tested benefit are granted a fee waiver if they provide sufficient proof of receipt of that benefit. They are not also required to prove they meet the income standard. In my experience, preparing a fee waiver request based on the means-tested benefit standard is simple and the required evidence easy for the applicant to obtain. It takes only a few minutes to complete. In most cases, Applicants already have in their possession documents meeting the evidentiary standard and requesting additional documentation from government agencies is unnecessary.</p> <p>In contrast, it is extremely time consuming to prepare and file a fee waiver when relying on the household income standard. The Applicant must gather financial information (e.g., pay stubs, tax returns, evidence of income) from all household members, not just the applicant, as it is the financial situation of the entire household that is relevant to determining the applicant's eligibility for the fee waiver. From my experience as a legal service provider, preparing the fee waiver and supporting evidence takes from a few hours to several hours depending on the number of household members from whom the applicant must request financially sensitive information, the number of income sources of each household member, and the number of employers from whom documentation must be obtained to meet the evidentiary standards of the fee waiver. Further, preparing the fee waiver requires accurate mathematical calculations. Therefore, under the proposed rule change which would require all applicants to meet household income standard, the fee waiver would no longer be simple and efficient, but would place a greater burden on the applicant to fill out the waiver and provide the necessary supporting evidence. The proposed scheme will not save time on behalf of the applicant.</p> <p>Further, the proposed rule change will result in more time being required by the agency to adjudicate the waiver as more information will have to be considered. Adjudication of the waiver will not require a simple review of evidence supporting receipt of the means tested benefit, but rather a complicated review of financial information and various supporting documents from many individuals making up an Applicant's household. The reviewer will also need to check Applicant's math to ensure the income reported is correct based on the evidence. This more complicated review will not save time on behalf of the agency, but will require more time for</p>

ID	Comment.	Commentor	Comment
1149	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 2: I. The Proposed Form Change Eliminating Receipt of Means-Tested Benefits as a Way to Prove Inability to Pay Is Irrational, and Is an Attack on Naturalization and Family-Based Immigration</p> <p>The proposed form change is an attack on naturalization and therefore an attack on family-based immigration. USCIS proposes to impose restrictions that lack rational justification or grounding in data, but will have the effect of making it much harder for individuals who qualify for the fee waiver to demonstrate their eligibility. The proposed changes to the fee waiver therefore appear designed to reduce the number of lawful permanent residents who naturalize, and thereby become eligible to petition for family members to immigrate. The changes would also reduce access to immigration relief for individuals who qualify under VAWA, TPS, a U-Visa, or a TVisa. The most widespread and streamlined way individuals establish their inability to pay the prescribed fee for naturalization or immigration relief is by showing receipt of a means-tested benefit. Removing this pathway to fee waiver eligibility is arbitrary and capricious. Should the proposed changes go into effect, the consequences are predictable: individuals who cannot afford to pay an immigration or naturalization filing fee will face barriers in demonstrating their inability to pay and will therefore find themselves priced out of applying. Research has established that immigration or naturalization filing fees can present an insurmountable obstacle.⁴ For example, the naturalization fee has gone up 800 percent in real terms over the last thirty years, pricing many qualified green card holders out of U.S. citizenship.⁵ Indeed, the cost of naturalizing is a major barrier to applying for naturalization.⁶ As a result, preserving straightforward access to the fee waiver is essential to allow individuals and our country to reap the well-documented benefits⁷ of having all qualified naturalization applicants achieve their goal of becoming U.S. citizens. It is equally important to preserving pathways to secure immigration status for vulnerable immigrants.</p> <p>Receipt of a means-tested benefit provides sufficient evidence of inability to pay the prescribed fee for an immigration or naturalization application, as required by 8 C.F.R. § 103.7(a). USCIS</p>

ID	Comment.	Commentor	Comment
1434	USCIS-2010-0008-1193	Joshua Hoyt, National Partnership for New Americans	<p>Comment part 3: The Policy Change on Fee Waivers Will Create Divisions Between USCIS and the Public that it is Tasked with Serving</p> <p>The proposed rule will also widen divisions between USCIS and the public that is supposed to serve, specifically immigrant communities who are eligible for citizenship and other benefits but face a series of barriers to applying. In addition to the backlog of citizenship applications and applicants’ increasing waiting times, USCIS has dedicated unprecedented levels of resources towards denaturalizing citizens.viii It has issued new policy guidance expanding the circumstances in which USCIS officials commence removal proceedings against applicants who are applying for benefits.ix USCIS leadership has also directed agency officials to deny applications for benefits, instead of requesting additional information or sending out a notice of intent to deny, in certain cases.x</p> <p>In the context of USCIS making citizenship, and immigration benefits in general, less attainable, the proposed rule fee waiver will further send the message to immigrant communities, including over 8.8 million eligible LPRs, that the agency is not willing to fairly adjudicate applications and expand access to eligible immigrants. Rather, the message to the public is that USCIS is a critical component of overarching immigration enforcement policies that also target and exclude eligible immigrants. This is not the message that the agency should be sending, and for this reason, we urge DHS and USCIS to reverse course and move to expand access to citizenship, not limit it.</p>

ID	Comment.	Commentor	Comment
105	USCIS-2010-0008-0229	Lucinda Roanoke	<p>I am a case manager at an NGO in the US that works with refugees and immigrants. We have a citizenship program that provides assistance to immigrants and refugees who are navigating the process to become citizens. Almost 100% of our clients are low income and depend on receiving a fee waiver in order to file their application for citizenship. If they did not receive fee waivers, the cost associated with applying for citizenship would be insurmountable as it is equal to an entire months' income (or more) for many of our clients. Removing the fee waiver option would only result in more people being in the US without becoming citizens. Furthermore, it will mean the legal immigration system is only accessible to those who have financial resources.</p> <p>Fleeing violence and persecution, refugees come to this country with nothing, then usually struggle for years to make a living wage, support their families, and/or to obtain formal education. They pay taxes and contribute to building our communities and neighborhoods.</p> <p>This country should do everything in its power to make the immigration process EASIER for eligible peoples, not HARDER and more expensive.</p>
132	USCIS-2010-0008-0288	Susan Allen- Bryan	<p>Having to learn how to file a tax return and having to file one even if your income is too low to be required to file, is putting an unnecessary hurdle in place for those who could prove that the N-400 \$725 filing fee for naturalization is cost prohibitive by sharing a letter showing that they have already qualified for a benefit such as food stamps. The benefit that theyve qualified for has already proven their low income eligibility.</p>
149	USCIS-2010-0008-0310	Elizabeth Pride	<p>I oppose the proposed "fee waiver" rule. This rule would make it near impossible to prove eligibility for fee waivers, making it difficult for eligible applicants to achieve their citizenship</p>

ID	Comment.	Commentor	Comment
190	USCIS-2010-0008-0337	Emily Headings	<p>I object to DHSs proposed change to limit the accepted documentation in support of fee waiver requests. This change is misguided for several reasons. First, the purported reason for the change the inconsistent income levels receiving means-tested benefits across states is questionable. This variation is to be expected, considering the varying costs of living around the country and the differing state policies around provision of work supports and basic necessities to their residents. If an individual is found to be unable to afford food or health care in any state, this finding should serve as strong evidence of inability to pay hundreds of dollars in immigration application fees. When a state agency with expertise in evaluating income within the context of a specific economy has already made a determination that the individual is in need of public support, it seems absurd for USCIS to imagine that they can make a better decision regarding need, based on a national standard or a more complicated set of documentation.</p> <p>Second, public benefits receipt as a basis for fee waivers allows for a more efficient process, both for the applicant and the government. A benefits letter is easy for a person receiving benefits to obtain. It is easy for an immigration officer to interpret, relying on the expertise of the state agency that granted the means-tested benefit. Low-income individuals may not file tax returns if they are below a set income. This would make it extremely difficult for such a person to show inability to pay under the proposed change, and require the immigration officer to evaluate a variety of documents. The training alone for this type of adjudication would be a significant cost of the rule change. Further costs in time would be exacted on applicants in trying to obtain such documentation and on non-profits which assist low income immigrants. In contrast, fee waivers based on public benefits documentation are an efficient and accurate means of showing eligibility.</p> <p>Finally, this proposed change is yet another barrier to low-income immigrants obtaining immigration benefits they are otherwise eligible for. Often, achieving naturalization results in more stability, including financial stability, for the applicant. Other applications, such as green card renewal, are required to have the correct documentation for work and travel. Making these applications less accessible could unfairly deny low-income individuals benefits that would benefit both them and society.</p> <p>By this rule change the government proposes to make its job more difficult and to make the fee waiver process harder (if not impossible) for low-income applicants. I urge USCIS to continue to accept proof of benefits receipt as a basis for a fee waiver.</p>

ID	Comment.	Commentor	Comment
199	USCIS-2010-0008-0396	Virginia Gallardo	<p>The is a Comment on the U.S. Citizenship and Immigration Services (USCIS) Notice: Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>For related information, Open Docket Folder</p> <p>Comment</p> <p>I am writing this comment to oppose the proposed changes to the fee waiver. While I do approve the lessening of the proof that would be required to show a fee waiver is needed, I believe it is wrong to do away with the ability to be granted a waiver based on receiving a means-tested benefit. It is inequitable and punishes people who wish to naturalize. It is unfair and it is unjust. These people work and contribute to society in a positive way. If this change is granted, it will be even harder for people to go through the process than it already is. These people are going through the right process and instead of rewarding them, the system is trying to punish them. Some applicants can only qualify through the means-tested benefit because they cannot afford to pay the exorbitant fees. Don't punish people just because they make less money.</p>

ID	Comment.	Commentor	Comment
284	USCIS-2010-0008-0415	Peter Tovey	<p>My sister was born abroad and was only four months old when my parents moved to the U.S. She obtained lawful permanent residence after high school, when my parents naturalized, however, it was not until 10 years later that she finally obtained her U.S. Naturalization at the age of 28. As a young mother of 2 U.S. Citizen children and a U.S. husband in school, she worked part time while raising two children and supporting her husband. The only way their family could survive during this time, was by obtaining government benefits. They were not "relying on the system," but were trying to make a better life for themselves. If I did not inform her about the fee waiver and continue to encourage her to apply for her Naturalization, she would not have applied. USCIS wants to eliminate receipt of public benefits as a source for the fee waiver. This would have an adverse and devastating effect on many people like my sister, making it more difficult, if not impossible, to become citizens.</p> <p>Fee waivers for naturalization are essential for individuals and families who are not in a position financially to afford the filing fees, and who are temporarily benefiting from government assistance. It is a hardship in and of itself to apply for naturalization without legal assistance, let alone afford the fees.</p> <p>Thank you.</p>

ID	Comment.	Commentor	Comment
344	USCIS-2010-0008-0516	Melissa Cober	<p>My name is Melissa Cober. I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at citizenship clinics 5 times over the last 2 years. I help at these workshops because as a daughter of immigrants, I am very thankful to be an American Citizen and hope to help others become citizens as well. Being a citizen brings me a feeling of security, knowing my family and myself wont get deported, allows us to contribute to our countrys economy, and participate in elections. My parents both immigrated from other countries and their stability allowed me to get a graduate degree education, travel easily outside of America with a US passport in order to expand my horizons, and now I work in the medical field and help others receive medical assistance. Im not a lawyer by trade, but I feel that it is important to help others at Citizen workshops. I know that not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons:</p> <ol style="list-style-type: none">1. Naturalizing makes people less likely to need public benefits, but prohibiting applicants to use proof of public benefits to qualify for the fee waiver will make them less likely to be able to naturalize. Naturalized citizens are more likely to access higher education as I did, become homeowners and business owners as I have, and earn higher wages, than their non-naturalized foreign-born peers. (https://dornsife.usc.edu/assets/sites/731/docs/citizen_gain_web.pdf). Naturalization, on average, accounts for an 8-11% increase in wages, which results in higher spending and state and local taxes paid. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply. This is important for the success of those people, and their family members who depend on them.2. I volunteer at the WNA clinics because they fill the gap in legal services for low income clients. But we are only able to meet with clients for the one day. Demand for services is very high and we dont have the time or resources to document income in the way the proposed regulation would require. We would end up serving fewer people and we would have to refer these people out who cannot afford legal services, and they may end up not applying at all.3. For individuals who are not required to file taxes, because they do not work or earn enough to be required to, there is no clear way to establish eligibility for a fee waiver. The piecemeal evidence that these individuals will provide will likely be rejected as insufficient by USCIS. Some applicants may try to submit again, which requires additional time to process and review.

ID	Comment.	Commentor	Comment
375	USCIS-2010-0008-0521	Valentina Ozbek	<p>Dear Ms. Deshommes:</p> <p>I strongly oppose the USCIS proposal to stop accepting receipt of a means-tested benefit such as Medicaid as evidence that a person qualifies for an application fee waiver. I am an immigration attorney and run large naturalization workshops in the San Francisco Bay Area where many upstanding members of the community benefit from public benefits and are thus able to obtain fee waivers. These are hardworking individuals who would not need public benefits if they lived elsewhere in the United States, but the high costs of living in the Bay Area makes it extremely difficult for them to make ends meet. Few are eligible for the income based fee waiver because of the higher wages they earn in the Bay Area due to the higher cost of living. Even though they earn more than the federal poverty guidelines they are very much living in poverty in the suburbs in and around San Francisco and the Silicon Valley - one of the most expensive places in the world.</p> <p>The United States is a big place wherein the economic experiences of its residents differ depending on the state they live in. The receipt of needs based benefits is an effective and efficient proxy for assessing the actual poverty that an individual experiences, and getting rid of this category of proof would preclude large swaths of the population in the more expensive areas of the country from naturalizing.</p> <p>Sincerely, Valentina Ozbek</p>
403	USCIS-2010-0008-0586	Duc Nguyen	<p>I would like to express my opposition to the change in fee waiver eligibility regulation, which will make it more difficult for many immigrants who are at a disadvantage due to their disabilities or are dependent on federal programs to qualify for the citizenship test.</p>

ID	Comment.	Commentor	Comment
404	USCIS-2010-0008-0543	Kathleen Weber	<p>I am strongly opposed to the proposed regulation changing the evidence that can be submitted for granting immigration fee waivers.</p> <p>No justification has been given by US CIS for eliminating the public benefits basis for fee waivers. Recipients of public benefits are already living at or below the federal poverty guidelines, which has been verified by the state or local government authorizing their grant of benefits to the recipients.</p> <p>Communities are burdened when immigrants cannot afford to legalize or naturalize. This strongly affects assimilation of immigrants into our communities and affects their ability to acquire better paying jobs, quality of their housing and other life options.</p> <p>Lastly, becoming a lawful permanent resident or US citizen should be open and accessible for everyone, not just those who are wealthy. Everyone benefits the more people who we have actively participating in civic life.</p>
439	USCIS-2010-0008-0539	Arundel Pritchett	<p>I am writing in opposition to the USCIS proposed changes to fee waiver eligibility. Family unity is essential. The poor should be discriminated against by being separated from their families simply because immigration filing fees cannot be paid. Please keep receipt of public benefits as a grounds for fee waivers.</p>

ID	Comment.	Commentor	Comment
448	USCIS-2010-0008-0541	Nikki Chau	As a refugee who became a citizen and who has contributed multi-fold back to the US economy, I urge you to please continue to allow low-income immigrants to use the benefit letter to prove their eligibility for a fee waiver. When I was growing up, my mom worked three jobs doing nails, teaching, and tutoring. My dad worked in a dry cleaner, assembly line, and delivered newspaper at 4am. Today my brother and I work in tech as an engineer and designer, we have paid back the assistance we received and more. I urge you to reconsider your proposed rule change, as it would make it much more difficult for low-income immigrants to become U.S. citizens, who would in return contribute to building a strong economy.
458	USCIS-2010-0008-0610	Lica Wada	Being able to use a means-tested benefits to prove income levels to obtain the fee waiver for work permits, green cards, and children's certifications of citizenship is the easiest way for low income immigrants to prove their eligibility. The benefit of fee waiver should be easy to access and not have barriers. I oppose the change on fee waivers! Keep the path to citizenship open!
542	USCIS-2010-0008-0728	Laura Myers	I'm horrified by this explicit attempt to make the asylum process more challenges. This regulation would eliminate the means-tested benefit category as a way to demonstrate eligibility for a fee waiver and thereby force many who cannot afford to pay the fee to undergo onerous review of financial hardship. This makes a humanitarian need way less humane a process. It will likely result in many LPRs simply not applying to naturalize, among many other vulnerable applicants not seeking to improve their status. This is not in line with our democratic values.

ID	Comment.	Commentor	Comment
564	USCIS-2010-0008-0689	Chi- En Yu	I support the receipt of means-tested benefits as a basis for qualifying for immigration application fee waivers. Hard-working immigrants are an invaluable asset to this country. The community I grew up in in Southern California and the community I am now part of in Northern California thrive socially and economically in large part because of the various immigrants, children of immigrants, and grandchildren of immigrants who make up the fabric of these communities and who contribute to the heart and soul of America.
573	USCIS-2010-0008-0701	Susan Hayase	I strongly object to changes in the waiver process that make it more difficult for applicants to become U.S. citizens. Benefit letters from state agencies should remain legitimate means to vouch for an applicant's claim to be low-income. People who are low income are less able to provide the other types of validation. The proposed changes are unfair and unnecessary. This is a solution to a non-existent problem. Bureaucrats in charge of process should be trying to serve the people better, not just make their own lives easier.

ID	Comment.	Commentor	Comment
585	USCIS-2010-0008-0722	Rosalind Holtzman	<p>I oppose the proposed changes to eligibility criteria on form I-912, regarding waiving fees associated with myriad immigration applications. The current reliance on one standard - qualifying for a means-tested benefit - is simple and straightforward. Changing this will make the application process both more byzantine and more onerous, unnecessarily burdening both the USCIS and agencies and organizations that assist immigrants, as well as immigrants themselves.</p> <p>There are 25 separate applications that will be affected by this rule change. The cost of the varied required immigration applications have increased substantially; some are now as high as \$1000 to \$1500 or more. That is a significant expense and likely to be a hardship in itself for those receiving means-tested benefits. It is likely to discourage or complicate efforts to apply for residency and citizenship.</p> <p>Higher fees, loss of waivers, and increased complexity required by added documentation will likely make naturalization more complicated and onerous. We will lose the ongoing and future contributions of immigrants by unduly making the path to permanent residency and citizenship more difficult.</p> <p>The proposed change, in short, just creates more complexity, less efficiency, and more unnecessary hurdles in the process of achieving residency, naturalization and citizenship, without clear benefit or advantage.</p> <p>My grandparents were immigrants. One grandfather was a barber, the other a rag and junk dealer. Their efforts allowed them to raise families and educate their children. My mother was a college graduate; my father earned a PhD in engineering and, among other achievements, was responsible for shepherding the cardiac catheter from prototype to lifesaving medical device.</p> <p>Such stories are not rare. What talents, skills, and contributions will we lose if we impose unnecessary burdens by changing this rule?</p>
634	USCIS-2010-0008-0773	Mason Lim	<p>This is a bad policy as it is making it more difficult for low income immigrants to get waivers for the fees associated with naturalization. Current method of verifying income using means tested benefit letter works and should not be changed.</p>

ID	Comment.	Commentor	Comment
728	USCIS-2010-0008-0758	Yajaira Roque	<p>My name is Yajaira. I am 22 years old and have been negatively impacted by the cuent administration. I have lost family members and can no longer stand in silence. I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I help at these programs because most of my family migrated from Mexico and have contributed all their life to this country. My mom is a respectable accountant and has yet to received her citizenship after being here for over 30 years. The amount of money spent to receive adequate access and resources is awful. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons:</p> <p>Inability to naturalize makes family unification less likely and weakens families.</p> <p>American values should include equal access to immigration and citizenship benefits regardless of wealth. This rule violates that value.</p> <p>Naturalizing makes people less likely to need public benefits, but prohibiting applicants to use proof of public benefits to qualify for the fee waiver will make them less likely to be able to naturalize. Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages, than their non-naturalized foreign-born peers. Naturalization, on average, accounts for an 8-11% increase in wages, which results in higher spending and state and local taxes paid. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply.</p>
740	USCIS-2010-0008-0876	Emely Perez	<p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application. The path to citizenship is a long and difficult process. This would only add more of a burden to our communities.</p>

ID	Comment.	Commentor	Comment
757	USCIS-2010-0008-1117	Jonnel Licari	<p>I am against this proposed revision. Immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p>
824	USCIS-2010-0008-0957	Adelina Solis	<p>Beyond reducing eligibility by eliminating means-tested benefits as a way to qualify for the fee waiver, this proposed rule change will burden even those who would continue to qualify through income based on the federal poverty line. With the current regulations, people can prove their income with a tax return. This is something that everyone who files taxes receives (though many others, such as those who do not earn enough to have to file taxes, do not). Under the proposed change, this simple, easily accessed document would no longer be sufficient proof. People seeking the fee waiver would have to procure a tax transcript instead. This is something most people have never even heard of.</p> <p>Requesting this documentation would actually amount to additional work and expense for federal agencies who would have to respond to these requests. This outcome is at odds with the claim that the proposed change is to reduce paperwork and expense for the government.</p> <p>Under the proposed change, those with limited resources would have to overcome many more complex, confusing obstacles on their path to citizenship. They may also incur additional expenses in order to get both the guidance necessary to be able to understand the requirements they must now fulfill, and in order to then acquire and submit the new required evidence of economic status. Why is the government seeking to place additional hurdles before those least equipped to overcome them?</p> <p>This proposed change ultimately reduces access to citizenship. It is one more attack on immigrants, and reveals yet again that the actions of this immigration are motivated by fear and bigotry, rather than out of any consideration for the good of American people. Immigrants make America great. Classism and xenophobia will destroy it.</p>

ID	Comment.	Commentor	Comment
827	USCIS-2010-0008-0795	David Strauss	<p>Your only rationale stated for eliminating the public benefits basis is to achieve consistency in the income levels being used to determine eligibility for a fee waiver. But this rationale ignores the fact that those states with higher maximum income eligibility criteria have set those criteria because of the higher cost of living in those states. The time and money that USCIS will have to expend in going back to individual determinations of low income is not only a misuse of agency resources, but also fails to factor in the additional time and money that will have to be spent defending the agency against inevitable claims of differential application of the low income standards to individual cases.</p> <p>If you insist on dismantling a functional system, why not at least just specify that you'll continue to rely on the low-income determinations of government benefit programs that have uniform eligibility standards (such as SNAP and TANF)? Or could it be that your rationale is no more than a fig leaf for an Administration-wide attempt to exclude even legal immigrants as much as possible from the benefits of full US citizenship if they do not arrive with enough money to buy their way in?</p>
829	USCIS-2010-0008-0953	Meghan Rosenberg	<p>I oppose this proposal to change the way filing fees are waived for immigrants receiving public assistance. It's extra work for an already overburdened organization and creates a boundary to citizenship for low-income immigrants, perpetuating the cycle of poverty and status. If people want to work hard to become citizens, they should be able to!</p>

ID	Comment.	Commentor	Comment
830	USCIS-2010-0008-1001	Kevin Herrera, The Sargent Shriver National Center on Poverty Law ("the Shriver Center")	<p>Comment part 1: RE: Comments in Opposition to Docket ID USCIS-2010-0008, OMB Control No. 1615–0116, Proposed Rulemaking Concerning Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes,</p> <p>The Sargent Shriver National Center on Poverty Law ("the Shriver Center") respectfully submits the following comments in response to the Department of Homeland Security's Notice of Proposed Rulemaking changing criteria for receipt of fee waivers among applicants for certain immigration benefits. The Shriver Center provides national leadership in advancing laws and policies that secure justice to improve the lives and opportunities of people living in poverty. Our work is grounded in serving communities by promoting health, nutrition and economic programs that provide security and afford opportunities to pursue stability and prosperity. The Shriver Center's advocates have both deep expertise and long-term experience with the effects of federal and state policy changes on the lives of people living at or near poverty. Our understanding of the issues pertinent to the proposed rule is further enhanced through our leadership of and participation in the Legal Impact Network, a peer collaborative consisting of 36 state-based law and policy organizations focused on improving living conditions for people with low incomes, including a focus on immigrants' rights and asset building practices.</p> <p>The Shriver Center strongly opposes changes to regulations that would limit access to certain United States Citizenship and Immigration Services fee waivers by eliminating the current policy of considering means-tested benefits as evidence of the need for a waiver and replacing it with a hard income cap. The proposed changes are not supported by the rationale offered by USCIS; would cause detrimental harm to the communities we serve; and would not create any demonstrable benefits for the agency. Furthermore, estimates indicate that the proposed changes would reduce the total population of people eligible for a fee waiver by two-thirds, resulting in two discrete harms. First, unavailability of fee waivers will deter eligible applicants from</p>

ID	Comment.	Commentor	Comment
855	USCIS-2010-0008-0844	Joyce Shiffrin	<p>I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule because all immigrants who want to become permanent residents which will eventually lead to their becoming citizens of the United States must always have the opportunity to do so and with nothing and nobody getting in their way.</p>
883	USCIS-2010-0008-0788	John Kendall	<p>Hello,</p> <p>I believe this rule change to be unnecessary in regulating fee waivers. This will penalize those people who have truly needed assistance in times of crisis and will remove a simple way to ascertain the need for a fee waiver. The large costs for immigration paperwork constitute a significant barrier to families and this makes the barrier even higher. It will depress the number of people working towards fully aligning their lives in our country, either by reunifying families or becoming citizens. What reason is given for removing the public benefits test for fee waivers? What are more secure ways to ascertain the true financial needs of immigrant families?</p> <p>Thank you.</p>

ID	Comment.	Commentor	Comment
885	USCIS-2010-0008-0792	Judith Lee	<p>This proposed rule would eliminate the means-tested benefit category as a way to demonstrate eligibility for a fee waiver. Instead the proposed rule would require vulnerable applicants to participate in a much more onerous review of financial hardship.</p> <p>This rule is ill advised and inconsistent with the need to assist needy people to be able to apply for citizenship or otherwise seek to improve their status. Many immigrants are greatly in need of a fee waiver and there shouldnt be financial barriers to attaining citizenship or legal status.</p> <p>Thank you for consideration of this perspective.</p>

ID	Comment.	Commentor	Comment
887	USCIS-2010-0008-0798	Ella Nimmo	<p>I oppose the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. I am currently a social worker working at a non-profit that provides legal and social services to immigrants. In this position I have seen first-hand how vital these fee waivers are to the hardworking, low income immigrant families we serve. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an unnecessary burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. The filing fees associated with filing immigration applications pose a significant obstacle for many families the process of applying for a fee waiver should be designed to mitigate, not exacerbate, these obstacles. Many of our clients at the organization I work for work many jobs, but are still unable to afford filing fees due to their low pay. If they were not able to access a fee waiver, many of the clients we have served would not have been able to adjust their immigration status. Being able to adjust status has allowed our clients to reunite with their families, continue their education, find better jobs, and more. I urge USCIS, rather than implementing the proposed rule change, to work instead to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will bring us closer to an inclusive process that honors our countrys commitment to welcoming immigrants. Our country should be one that welcomes all, regardless of their income; there should not be a wealth test for the American Dream</p>

ID	Comment.	Commentor	Comment
889	USCIS-2010-0008-0805	Megan Martin, Center for the Study of Social Policy	<p>Comment part 1: Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Center for the Study of Social Policy in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>The Center for the Study of Social Policy (CSSP) is a national nonprofit organization recognized for its leadership in reforming public systems and advancing policies that promote equity and improve the lives of children and families. We work directly in state public systems and provide technical assistance and policy analysis on a broad set of policies affecting children and families, including immigrant families. Our work is devoted to establishing a level playing field for children of all races, ethnicities, and income levels and promoting child and family well-being.</p> <p>The filing fee associated with various immigration benefits can be an insurmountable obstacle for many families applying for an immigration benefit or naturalization. The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence will make it more difficult for people to apply for immigration benefits and naturalization. Rather than increasing obstacles, given the benefits naturalization confers on individuals and society as a whole the government should make it easier to apply for naturalization.</p>
890	USCIS-2010-0008-0819	Toni Long	<p>I strongly oppose the proposed revision to the fee waiver process. Using only tax returns for income verification will eliminate all people with the lowest incomes who are not required to file federal income tax returns. This leaves them with no way to prove their income and qualify for the fee waiver. USCIS should not punish individuals and families applying for citizenship in this way. Our country has flourished because of immigrants who rise to higher levels of contributions through their future generations. This proposed change violates American values and what is ultimately best for the economy.</p>

ID	Comment.	Commentor	Comment
898	USCIS-2010-0008-0836	Carol McLoughlin	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. This proposed rule discriminates against poor immigrant families who need the opportunity to have permanent legal status in the US.---which may help improve their economic standing.
900	USCIS-2010-0008-0842	Wendy Sacks	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. This country has always welcomed immigrants. I oppose these changes which will make it difficult if not impossible for low income Green Card holders to renew them.

ID	Comment.	Commentor	Comment
901	USCIS-2010-0008-0849	McKenna Lux	<p>This proposed rule change is yet another attack on America's poorest residents and only deepens and institutionalizes a vicious cycle of poverty, rather than providing a pathway for citizenship and economic success.</p> <p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p>

ID	Comment.	Commentor	Comment
904	USCIS-2010-0008-0877	Amy Lee	<p>I oppose this proposal. This proposal is mean-spirited and is yet another backdoor attempt by this Administration to only allow wealthy and skilled immigrants in and to keep out immigrants whom it considers as less deserving. The effect of this rule change is that immigrants who receive means-tested benefits will face substantially more barriers to applying for immigration benefits for which they are eligible. Requiring applicants to provide proof other than a letter from the state or local agency administering the benefits is a huge obstacle. Most immigrants do have paystubs, rent receipts or other traditional proof of income and expenses. Most dont make enough money to file a federal tax return. Moreover, regardless of what state they may live in, immigrants who are on public assistance are struggling to make ends meet and cannot affording the escalating application fees.</p> <p>I am particularly concern about the impact this rule change will have on the ability of immigrants to naturalize. If immigrants are unable pay the required \$725 fee to apply for naturalization, they cannot become citizens. If they cannot become citizens, they cannot vote. The unintended (or intended) effect of this rule is that fewer indigent immigrants will be permitted to participate in our nations political process to decide who our leaders will be and what laws should govern our land.</p> <p>When I volunteered at a citizenship workshop in El Paso, TX in the past several years, I met many immigrants who relied on fee waivers based on receipt of means-tested benefits to apply for naturalization. Many were elderly and had lived in the U.S. for over 20 years. Without this type of fee waiver, they simply would not have been able to apply to become a citizen. Most of the people I helped did not make enough money to file a federal tax return and did not have the documentation required to apply for a fee waiver based on either 150% FPL or financial hardship. Under this proposal, these folks would be shut out of the American political process and would never realize their dream of becoming U.S. citizens.</p> <p>I urge you to NOT make this rule change and to keep allowing immigrants to apply for fee waivers based on receipt of means-tested benefits.</p>

ID	Comment.	Commentor	Comment
917	USCIS-2010-0008-0934	Daniel Baer	<p>This is a drastic change that has managed to largely creep under the radar of public awareness. I think that if more people knew about this proposed change, people would be outraged by it. The likely result of eliminating the means-tested benefit category as a way to demonstrate eligibility for a fee waiver is that many LPRs will simply not apply to naturalize, among many other vulnerable applicants not seeking to improve their status. Because applicants would have to undergo a much more onerous review of financial hardship, the effect of this change would be to discourage people who cannot afford fees from applying. This is a politically motivated attack on immigrants at a time when immigrants in this nation of immigrants are already feeling under attack. If we are to keep our moral center as a nation, we need to continue to provide a path to citizenship for immigrants. Without that moral center, we divide ourselves into "us" and "them," which has never ended well for anyone. With this kind of change, the administration is broadening its attack on immigrants to include those who are eligible for naturalization. We owe those who cook our meals, clean our offices, drive us to our destinations, and care for our children, the simple right to fully participate in our democracy. This change will result in taking that right away from countless people.</p>
932	USCIS-2010-0008-0993	Sam Holmes	<p>I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. The proposed rule is fundamentally against what it means to be an American.</p>

ID	Comment.	Commentor	Comment
1003	USCIS-2010-0008-1100	Lauren Dudley	<p>November 27, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>I, Lauren Dudley, write to oppose changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018. The proposed process would impose new mandates on applicants seeking services, by requiring every member of their families applying simultaneously for services to submit a fee waiver application using Form I-912. The proposal would also disallow receipt of a means-tested benefit to prove eligibility for a fee waiver. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) - which faces an already troublingly-large backlog of pending requests – as well as applicants, and the organizations that assist them.</p> <ul style="list-style-type: none">• In my experience in working on fee-waiver-eligible applications over the last year at my organization, I have assisted dozens of low-income Asian refugees and immigrants in applying for naturalization.• The accomplishments of clients and community members who have applied for U.S. citizenship and completed the interview process have been immense. Many people return to our office stating they finally feel like true Americans and want to meaningfully contribute in their community in the form of voting as a result of becoming citizens.• I have also worked to support clients obtain employment. Many clients report finding more employment opportunities after they have become citizens. This is most likely stems from increased confidence and less pressure to work in low-wage positions. <p>Naturalization Benefits All Americans</p>

ID	Comment.	Commentor	Comment
1014	USCIS-2010-0008-1118	Laura Vazquez, UnidosUS	<p>Comment part 1: Dear Ms Deshomrnes</p> <p>Thank you for the opportunity to submit comments on the U.S. Department of Homeland Security's (DHS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. If promulgated, this rule would create an additional burden on individuals, service providers, and federal agencies. UnidosUS strongly opposes this proposed rule to stop accepting receipt of a means-tested benefit as evidence that a person qualifies for an application fee waiver and urges USCIS to rescind this proposal.</p> <p>Since 1968, UnidosUS—formerly known as the National Council of La Raza—has been committed to building a stronger America by creating opportunities for Latinos. In this rich 50-year history, UnidosUS has remained a trusted, nonpartisan voice for Latinos, serving the community through research, policy analysis, and state and national advocacy. We also work closely with a network of nearly 300 community-based organizations in 37 states, the District of Columbia, and Puerto Rico, to serve our community in a variety of areas including providing citizenship classes for eligible permanent residents. More than 50 of our Affiliates provide immigration legal services to primarily low-income immigrants, including many who depend on the fee waiver to help with the high cost of USCIS application fees. This proposed rule would drastically impact the clients that our Affiliates serve and will place a significant burden on their legal services programs.</p> <p>UnidosUS strongly opposes the proposed changes to fee waiver eligibility criteria because it would significantly harm the ability of eligible permanent residents to apply for naturalization and it would place a significant burden on legal service providers. We urge you to consider the following issues through UnidosUS perspective, as you consider the proposed changes to the existing rule</p>

ID	Comment.	Commentor	Comment
1017	USCIS-2010-0008-1121	Chas Hertel	USCIS should not change their fee-waiver policy that allows those that receive a means-tested benefit from their state or the federal government to apply for and receive a waiver of USCIS fees. While the income requirements to qualify for a means tested benefit are different from state to state, cost of living also varies wildly. If this policy changes, many families who have done all the right things to assimilate into American society, won't be able to afford for their family to become naturalized Americans. This proposed policy change is contrary to the values this country was founded upon and should not be implemented. Thank you for your consideration.
1038	USCIS-2010-0008-1154	Neal Kennedy	This proposed policy is discriminative. It would eliminate receipt of means-tested benefits as a basis for qualifying for a fee waiver in citizenship and green card applications. Individuals attempting to become citizens should not be discriminated against based on income. I strongly oppose this new policy.

ID	Comment.	Commentor	Comment
1051	USCIS-2010-0008-1171	Laura Armstrong on behalf of La Casa Hogar	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>I am writing, on behalf of La Casa Hogar, to strongly oppose the USCIS proposal to stop accepting receipt of a means-tested benefit as evidence that a person qualifies for an application fee waiver. La Casa Hogar ("La Casa") is a 501c3 nonprofit organization in Yakima, WA whose mission is to connect and educate Latina families to transform lives and our Yakima Valley. La Casa pursues its mission through three primary programs: 1. Adult Education (English, pre-GED, leadership development, tutoring, computer literacy), 2. Early Learning Center (serving children ages 2-5), and 3. Citizenship Education and Legal Services. Our annual budget is \$584,020 and each year, over 600 families are served through these services.</p> <p>In 2010, an adult student, Rosa1, asked the program director of La Casa at the time, Luz, to begin offering citizenship classes. The minimum number of people La Casa needed to begin was 10; Rosa found 10 other people who were also eligible for naturalization and within a few weeks, La Casa began offering citizenship education classes. In 2013, La Casa obtained DOJ-Recognition and Luz, the program director, became the very first DOJ-Accredited individual in the City of Yakima. Since then, over 1,000 people have naturalized through La Casa Hogar's citizenship program. Annually, between 400-500 people attend citizenship classes and over 200 N-400s are completed. Because of the effectiveness of this holistic model of education and legal services, La Casa maintains a 90-94% success rate among those submitting their N400. La Casa is one of the only trusted, holistic citizenship service providers in the Yakima Valley. Individuals come from as far as 3 hours away to take classes and find legal assistance at La Casa.</p> <p>Specifically, La Casa assists individuals with the following forms: N-400, N-648, I-912, I-942 and G28. Below is a table depicting La Casa's naturalization applications completed, fee waivers completed, and percent of N400s with Fee Waivers completed for the last two years:Year N400s Fee Waivers</p> <p>Percentage of N400s with</p>

ID	Comment.	Commentor	Comment
1057	USCIS-2010-0008-1177	Zulma Maciel	<p>In calendar year 2017, almost 40 percent of citizenship applicants applied for a fee waiver, the majority of which were based on receipt of a means-tested benefit, meaning that the proposed rule has the potential to impact approximately 244,000 immigrants who have the opportunity to obtain citizenship and the right to receive fair and equal treatment from USCIS. Instead, the proposed rule would increase the overwhelming backlog of over 750,000 citizenship applications before the agency, extend waiting times for those applicants, which has already recently doubled, or worse, deter eligible immigrants from applying. This would prevent immigrants ability to integrate into the country, access higher economic and educational opportunities, and ultimately harms us all. It is for these reasons that I strongly oppose the proposed rule and call on DHS to withdraw it.</p>
1089	USCIS-2010-0008-1209	Anonymous (Concerned Citizen)	<p>Thanks for taking public comment on this issue. I am strongly opposed to the USCIS proposed changes to fee waiver eligibility criteria. I support keeping the pathway to citizenship open and unencumbered. As the child of a naturalized citizen, I know the challenges that can be faced on a daily basis. As a public health professional I see the impacts that poverty has on our communities.</p> <p>The proposed changes to the fee waiver will make it harder for very poor families and individuals to produce the necessary documentation as it removes the "means-tested benefit" as sufficient evidence of inability to pay. I serve clients who receive these benefits and can attest that they do not need more barriers when attempting to become productive members of US society. Naturalized citizens and immigrants are upstanding people who work hard and advance American ideals.</p> <p>Please reject the proposed changes to would affect Form I-912</p>

ID	Comment.	Commentor	Comment
1100	USCIS-2010-0008-1220	Mass Mail Campaign 4: Comment Submitted by Leva Zadina, Total as of 11/28/2018: 61	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. Immigrants continue to make America grea
1144	USCIS-2010-0008-0723	Issa Ndiaye, The West African Community Council (WACC)	<p>Comment part 2: The Proposed Changes Would Reduce Naturalization and Access to Other Immigration Services</p> <p>Unfortunately, by imposing additional burden on applicants, the entities that assist them, and USCIS and other state and federal agency staff, the proposed changes to the fee waiver application process would severely limit naturalization and impair the productivity of many foreign-born residents of The West African Community in Washington State. We strongly oppose this threat to economic and social progress in Washington state and the greater community of immigrants.</p> <p>Receipt of a means-tested benefit is the most straightforward and the least labor-intensive method of proving inability to pay USCIS fees, because it leverages analysis that other government agencies have already completed of individuals' income and other relevant circumstances. Forcing fee waiver adjudications to instead consider extensive original documentation of the many factors that determine income or hardship will hinder applicants and slow USCIS's decision-making process, exacerbating the already-sizable backlogs of applications. This would lead to the opposite of administrative efficiency. Requiring submission of a Form I-912 and supporting documentation from every applicant – even those applying simultaneously with identically-situated family members – will have the same negative effects. When the fees for naturalization or immigration benefits increase, our clients have tended to delay applying to the benefit because immediate costs for food, shelter, caring for their family members daily trump applying for the benefit. In the past, we have submitted the food stamp benefit letter as proof. This new process would make it more challenging for families who are already struggling prove that they qualify</p>

ID	Comment.	Commentor	Comment
1166	USCIS-2010-0008-0941	Kham Moua, Southeast Asia Resource Action Center	<p>Comment part 3: Despite Moderate Success, Southeast Asian Americans are still Impacted by High Rates of Poverty and Language Barriers</p> <p>SEAA communities are particularly sensitive to changes to fee waivers eligibilities. They encompass some of the highest rates of limited English proficiency (LEP) and poverty of all racial and ethnic groups in the United States. According to U.S. Census estimates from 2011-2015, 38.3% of Cambodian, 36.7% of Hmong, 34.5% of Lao, and 48.6% of Vietnamese households that speak English less than “very well,” compared to 8.6% of total US households. 6 Because of high LEP rates, many require the assistance of translators in their application process, increasing burdens on already under resourced community-based organizations or further increasing the costs of applying for applicants hiring private services.</p> <p>SEAA communities also experience poverty at high rates, with 11% of Lao families, 13% of Vietnamese families, 14.9% of Cambodian families, and 16.3% of Hmong families still livingbelow the poverty line. As such, these communities rely heavily on programs like SNAP and 7</p> <p>Medicaid to help support their livelihoods and demonstrate the reliability of means-tested public 8 benefits as a primary evidence of financial hardship. Because of these communities’ low English ability, high poverty, and reliance on welfare programs, removing automatic waivers only further decreases the ability of SEAs from naturalizing.</p>

ID	Comment.	Commentor	Comment
1224	USCIS-2010-0008-0967	Daniel Bruner, Whitman-Walker Health	<p>Comment part 1: Pursuant to the notice and request for comments published on September 28, 2018, 83 Fed. Reg. 49,120, Whitman-Walker Health (Whitman-Walker or WWH) hereby submits these comments to the changes proposed by USCIS in the eligibility requirements to obtain waivers from the very substantial filing fees for applications for relief under the immigration laws. The proposal to eliminate receipt of means-tested benefits, as one ground for a fee waiver, will make waivers much more difficult to obtain, and make forms of relief that our immigration laws and policies intend to provide essentially unobtainable for many individuals of limited means. There is no economic or public policy basis for this harsh result, and we urge USCIS to continue to adhere to the well-established fee waiver guidelines in Policy Memorandum PM-602-0011.1.1</p> <p>Interest of Whitman-Walker Health</p> <p>Whitman-Walker is a federally qualified health center providing primary medical care, HIV specialty care, mental health care and substance abuse treatment services, dental care, community health services (including HIV testing and counseling, sexually transmitted infections testing and counseling, breast health and other women’s health services), youth and family services, and legal services to individuals and families throughout the Washington, DC metropolitan area. Although our patients and clients come from every income level, substantial numbers are lower-income. Moreover, significant numbers of our patients and others receiving health-related services are foreign-born. Because of our commitment to holistic health care, which includes addressing the legal and social determinants of health (and ill-health), for more than three decades our in-house Legal Services Department, with the assistance of hundreds of volunteer attorneys throughout the area, has provided a wide range of immigration-related services to WWH patients, to individuals living with HIV, and to foreign-born lesbian, gay, bisexual and transgender (LGBT) individuals and families. Because of the difficult circumstances in which they have come to the U.S. – for instance, fleeing persecution in their countries of birth – many if not most of our immigration clients and foreign-born health care patients have limited means, particularly until their lawful immigration status is established and they are able to make new lives for themselves and becoming fully contributing members of our society. Our immigration lawyers have substantial experience with the guidelines and processes for obtaining waivers from the – generally very high – fees required for obtain immigration relief.</p>

ID	Comment.	Commentor	Comment
1368	USCIS-2010-0008-1049	Alvina Yeh on behalf of the Asian Pacific American Labor Alliance, AFL-CIO (APALA)	<p>Comment part 3: The Proposal Increases Barriers to Naturalization</p> <p>Many Southeast Asian immigrants and refugees rely on fee-waivers to naturalize. The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles.</p> <p>The application requirements and additional evidence necessary derived from this proposal increases the complexity for filing Form I-912. Given the already high rates of LEP individuals in SEAA communities, this will likely lead to higher rates of mistakes in the process for these applicants. The complex form for a fee waiver and the already daunting naturalization fee will likely decrease the ability of LPRs from applying for U.S. citizenship.</p> <p>Additionally, the naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship. As mentioned above, there is a high rate of poverty in SEAA communities. However, many SEAA LPR families face additional financial hardships in addition to their low-income. Since 1998, at least 16,000 SEAA community members have received final orders of deportation to the countries they originally fled as refugees. Many of these individuals are the primary breadwinners in their families, and their detentions and deportations have further impoverished their already poor families, primarily women and children. Removing means-tested benefits as evidence for a fee waiver only further reduces the ability of the remaining family members from naturalizing. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating a process inaccessible to many SEAA individuals.</p>

ID	Comment.	Commentor	Comment
1387	USCIS-2010-0008-1070	Wade Askew, Legal Services of Northern California	<p>Comment part 2: The Proposed Changes Would Reduce Naturalization and Access to Other Immigration Services</p> <p>Unfortunately, by imposing additional burden on applicants, the entities that assist them, and USCIS and other state and federal agency staff, the proposed changes to the fee waiver application process would severely limit naturalization and impair the productivity of many foreign-born residents of Northern California. We strongly oppose this threat to economic and social progress in Northern California.</p> <p>Receipt of a means-tested benefit is the most straightforward and the least labor-intensive method of proving inability to pay USCIS fees, because it leverages analysis that other government agencies have already completed of individuals income and other relevant circumstances. Forcing fee waiver adjudications to instead consider extensive original documentation of the many factors that determine income or hardship will hinder applicants and slow USCIS's decision-making process, exacerbating the already-sizable backlogs of applications. Requiring submission of a Form 1-912 and supporting documentation from every applicant — even those applying simultaneously with identically-situated family members — will have the same negative effects.</p> <p>In LSNC's experience, the current fee-waiver process already demands a high level of proof of low-income status. For example, the California Superior Courts do not demand court users to submit copies of pay-stubs or public benefit receipt documents, but instead they only ask that court users attest to their income status under penalty of perjury when seeking a fee waiver of court costs. California Superior Courts consider receipt of public benefits as automatic proof of indigence and qualification for fee waivers.</p> <p>Meanwhile, USCIS already imposes stringent requirements that require applicants to prove their financial status. The current fee waiver requirements require applicants to gather significant proof of their income status. Acquiring documents in support of a fee waiver application is typically most difficult for those who do not receive public benefits and thus must obtain proof of income, expenses, and assets. While this may be relatively easy for some many of LSNC's</p>

ID	Comment.	Commentor	Comment
1388	USCIS-2010-0008-1070	Wade Askew, Legal Services of Northern California	<p>Comment part 3: Eliminating Receipt of Benefits as Proof of Fee Waiver Eligibility Is An Extraordinary and Indefensible Proposal</p> <p>Streamlining and modernizing the immigration services application process is a laudable goal, but this proposed change contravenes it. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCIS's proposal would make that process more complicated, expensive, and paperwork-heavy — in direct derogation of the agency's stated intention to simplify adjudications.</p> <p>Withdrawing the most simple and unambiguous method of demonstrating fee waiver eligibility departs from the historical precedent of progress toward greater efficiency in USCIS adjudication. Efficiency is enshrined in USCIS's mission statement, and its pursuit is reflected in such initiatives as creation of an electronic filing system, and elimination of the previous requirement to file a separate biographical information form (G-325A) with applications for adjustment of status. The current proposal will increase time and dollar costs imposed upon every entity involved in administering fee waivers, including the USCIS, the Internal Revenue Service, other government agencies, organizations like LSNC, and applicants themselves. Should USCIS implement the proposal, LSNC's time helping applicants for naturalization navigate the fee waiver process would increase. This unnecessary burden would prove costly for LSNC, likely requiring more attorneys to be present at our clinics and more follow-up work to be completed by attorneys after clinics. This would thereby divert attorney time from other essential work, including preservation of housing, advocacy for seniors and veterans, and ensuring basic income maintenance of our clients.</p> <p>This proposal also departs from the federal government's longstanding appreciation of the special benefit that naturalization confers by making our nation stronger and more prosperous. As the numbers of naturalized citizens and organizations assisting them have grown, researchers have amassed more extensive data that have sharpened our understanding of the many benefits that flow from individual decisions to naturalize. Increasingly, Congress and other</p>

ID	Comment.	Commentor	Comment
355	USCIS-2010-0008-0504	Elisa Cozad	<p>My name is Elisa Cozad.</p> <p>I oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I am a volunteer for the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at WNA Citizenship Day events. I volunteer because there are so many amazing incredible people that need help applying to become a citizen. Most people cannot afford a lawyer, so we work with volunteer attorneys to help people apply for citizenship successfully. Many people we serve are eligible for fee waivers based on receipt of public benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is too expensive for many people. I oppose the rule for these reasons:</p> <p>1)The proposed revision is not necessary and will unfairly burden applicants, especially on the lowest income, elderly and disabled people who are not required to file tax returns. At our one-day workshops, it takes about 10 minutes to fill out a fee waiver application for someone receiving an approved means-tested benefit. Income-based fee waivers require more evidence and can take hours to prepare. They require the most recent years tax return and pay stubs from the last three months, or a combination of other income evidence, such as a tax transcript or proof of unemployment payments. Gathering this evidence could take someone weeks, and so and we would not be able to assist these applicants at our workshops. For many people - due to language, geography or cost - these one-day citizenship clinics are their only opportunity to access application assistance.</p> <p>2)Nonprofit agencies like OneAmerica would have to retrain staff and volunteers, change and retranslate their educational and outreach materials, incurring costs for translation, design, printing and distribution. The additional time needed to find the necessary proof of income will stretch their staff capacity, resources and infrastructure.</p> <p>3)The rule will cost USCIS more in staff time spent scrutinizing income and tax information due to the extra documentation required. USCIS should focus its efforts on eliminating backlogs 753,352 in the U.S. and 18,707 in Seattle rather than implementing changes that could lead to an increase in backlogs. More officer time spent adjudicating complicated fee waivers means less time adjudicating the backlog of long-pending applications.</p> <p>4)People who receive public benefits and later file for naturalization and become U.S. citizens are more likely to get a higher paying job, complete education, have</p>

ID	Comment.	Commentor	Comment
444	USCIS-2010-0008-0596	Allison Gasca- Backman	<p>I strongly oppose this proposal to terminate fee waivers for individuals receiving public benefits, such as Food Stamps, Public Housing, and Medicaid (as the basis for the fee waiver). Requiring individuals to provide tax documents and income levels creates additional paperwork and an unfair burden on individuals who may not be able to obtain these documents. These individuals certainly do not make enough money to pay the \$725 for the fee waiver; as such, they will likely be unable to apply for citizenship, as this financial barrier will prove insurmountable. Citizenship provides many securities and protections to immigrants, and denying people a simple and feasible pathway to citizenship is inhumane. This proposed change seems designed with the sole purpose of creating obstacles to low-income immigrants and denying them their right to citizenship.</p> <p>Furthermore, the proposed rule does not save taxpayers any money and will in fact generate MORE work and cost to USCIS to review the additional income documentation brought about by the new rule. To speed up the process, the fee waiver should stay for the benefit of USCIS and for the applicants.</p>

ID	Comment.	Commentor	Comment
471	USCIS-2010-0008-0674	Jessica Mendelson	<p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>In calendar year 2017, almost 40 percent of citizenship applicants applied for a fee waiver, the majority of which were based on receipt of a means-tested benefit, meaning that the proposed rule has the potential to impact approximately 244,000 immigrants who have the opportunity to obtain citizenship and the right to receive fair and equal treatment from USCIS. Instead, the proposed rule would increase the overwhelming backlog of over 750,000 citizenship applications before the agency, extend waiting times for those applicants, which has already recently doubled, or worse, deter eligible immigrants from applying. This would prevent immigrants ability to integrate into the country, access higher economic and educational opportunities, and ultimately harms us all. It is for these reasons that I strongly oppose the proposed rule and call on DHS to withdraw it.</p>

ID	Comment.	Commentor	Comment
635	USCIS-2010-0008-0771	Jennifer Colyer	<p>I have always understood USCIS's consideration of the receipt of public benefits as a criteria for granting a fee waiver as a judicious use of agency resources. Relying on a state or local agency to determine need eliminates the work that USCIS would otherwise have to do to determine whether a given applicant is needy. Most jurisdictions, if not all, have stringent requirements for the receipt of public aid and it is rarely granted and available only to those who are in dire poverty, so using that as a yardstick also ensures that USCIS is granting a fee waiver to those who are deserving of a fee waiver. To eliminate this category will unnecessarily increase the burdens on USCIS, which will have to undertake its own analysis of each applicant.</p> <p>Eliminating this criterion will also throw a roadblock before the many US Lawful Permanent Residents who would seek to naturalize, as well as others who qualify for benefits in order to regularize their immigration status. From that standpoint, it compromises USCIS's efforts to serve its customers well.</p> <p>I therefore would suggest that USCIS rescind this guidance and continue to accept documentation showing the receipt of public benefits in support of Form I-912.</p>

ID	Comment.	Commentor	Comment
863	USCIS-2010-0008-0884	USCIS-2010-0008-0884	<p>I strongly oppose the proposal to terminate fee waivers based on means-tested benefits for citizenship applicants. Not only would this decrease the efficiency and build on the already heightened backlog of USCIS, but it would inevitably prevent many low-income immigrants from gaining citizenship.</p> <p>Fee waivers are imperative in allowing citizenship to be accessible to all eligible lawful permanent residents, not just those who can afford it. Allowing fee waivers to be accessed through means-tested benefits significantly eases this process for applicants, their representatives, and USCIS officials. I currently work at a nonprofit providing free legal aid to those applying for citizenship and have seen how much extra time and resources it requires on both ends to process tax returns and paystubs to acquire a fee waiver. Furthermore, USCIS requires substantially more proof from an applicant applying based purely off of income, which makes the process much lengthier and more difficult for applicants. Many citizenship applicants are low-income, elderly, disabled, or unemployed, meaning that access to tax returns, paystubs, and other proof of financial support is often unstable and difficult to obtain. As a result, applicants forced to apply for a fee waiver based off of income alone are turned down for a fee waiver much more often, and this proposal will severely lower the number of new citizens from low-income households. If these people have already been approved to receive government benefits, they have proven that they are entitled to a fee waiver. Overall, eligible residents have earned the right to citizenship regardless of their socioeconomic status, and to further complicate this application process for low-income applicants is blatantly discriminatory.</p> <p>This proposal will decrease the efficiency of USCIS, which is already significantly backlogged despite added resources. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p>

ID	Comment.	Commentor	Comment
870	USCIS-2010-0008-0865	Erendira Rendon	<p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p>

ID	Comment.	Commentor	Comment
973	USCIS-2010-0008-1055	Casey Bryant, Arkansas United	<p>I am an immigration attorney practicing in Tennessee, Arkansas, Mississippi and Louisiana. I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would not only cut off access to citizenship, but also other types of applications for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining legal status based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>Those people who are are statutorily eligible to apply for legal status in United States should be allowed to do so without an onerous and burdensome process of proving they qualify for a fee waiver, especially if they have already done so with another agency where the requirements are dictated by the federal government. This proposed rule undermines our national values and makes impotent those statutes that grant legal status to people who meet the requirements simply because they are not able to afford the filing fee. Those people are therefore relegated to remain without full status, without the full rights and protections of citizens, which they are otherwise eligible for.</p> <p>This proposed rule is drafted to appear to relieve applicants from the trouble of having to submit information about their means-tested benefits and to standardize poverty guidelines nationwide, but on the contrary, it will make a person's income much more difficult to prove as indicated by the increased estimated burden on the public. The I-912 already provides multiple ways of proving one's income and there is currently no absolute requirement to submit proof of a means-tested benefit. Rather, the option to submit such proof enables the applicant to have undergone an holistic process of income verification through a state agency that is equipped and trained to evaluate individual and local circumstances in order to make a realistic determination of a person's ability to pay.</p> <p>It is for these reasons that I strongly oppose the proposed rule and call on DHS to withdraw it.</p>

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1080	USCIS-2010-0008-1200	Cindy Zapata, Harvard Immigration and Refugee Clinical Program	<p>Comment part 1: November 27, 2018</p> <p>Submitted via www.regulations.gov</p> <p>Samantha L. Deshommes</p> <p>Chief, Regulatory Coordination Division, Office of Policy and Strategy</p> <p>U.S. Citizenship and Immigration Services</p> <p>Department of Homeland Security</p> <p>20 Massachusetts Avenue NW</p> <p>Washington, DC 20529-2140</p> <p>Re: OMB Control Number 1615-0116; United States Citizenship and Immigration Services, Docket ID USCIS-2010-0008</p> <p>Dear Ms. Deshommes,</p> <p>We are writing on behalf of the Harvard Immigration and Refugee Clinical Program (HIRC) and the Harvard Law School Immigration Project (HIP) in Cambridge, Massachusetts to express our strong opposition to the United States Citizenship and Immigration Services' ("USCIS") Proposed Change to Form I-912, Request for Fee Waiver (the "Proposed Change") related to removing receipt of a means-tested benefit as a category of eligibility for a fee waiver. We, the signatories of this letter, are immigration lawyers and law students from HIRC and HIP. Founded in 1984, HIRC was one of the first immigration and refugee clinics in the United States. In partnership with Greater Boston Legal Services (GBLS), the largest legal services provider in New England, HIRC has represented thousands of individuals from around the world in their efforts to gain humanitarian protections, like asylum. HIP is a student-practice organization under the supervision of HIRC, which provides law students with the opportunity to gain practical, hands-on legal experience. HIP represents clients seeking release from detention in Massachusetts, promotes policy reform, and provides representation to refugees and asylees who are seeking family reunification and legal residency.</p> <p>HIRC and HIP represent individuals who have been granted asylum and dependent I-912</p>

ID	Comment.	Commentor	Comment
1113	USCIS-2010-0008-1233	Cynthia Frey	<p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p>

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1145	USCIS-2010-0008-0723	Issa Ndiaye, The West African Community Council (WACC)	<p>Comment part 3: Eliminating Receipt of Benefits as Proof of Fee Waiver Eligibility Would be Costly, Burdensome and Lead to a more Inefficient Administrative Process</p> <p>The proposed changes would not effectively accomplish the goal of streamlining and modernizing the immigration services applications. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCIS’s proposal would make that process more complicated, expensive, and paperwork-heavy – in direct derogation of the agency’s stated intention to simplify adjudications. Withdrawing the most simple and unambiguous method of demonstrating fee waiver eligibility departs from the historical precedent of progress toward greater efficiency in USCIS adjudication. Efficiency is enshrined in USCIS’s mission statement, and its pursuit is reflected in such initiatives as creation of an electronic filing system, and elimination of the previous requirement to file a separate biographical information form (G-325A) with applications for adjustment of status. The current proposal will increase time and dollar costs imposed upon every entity involved in administering fee waivers, including the USCIS, the Internal Revenue Service, other government agencies - and applicants themselves.</p> <p>The changes would make it costly for the West African Community Council through increased use of staff time in gather documents and evidence necessary. It would also increase the printing costs. The proposed changes would create a cost-shift to applicants and organizations who are already facing financial struggles.</p> <p>This proposal also departs from the federal government’s longstanding appreciation of the special benefit that naturalization confers by making our nation stronger and more prosperous. As the numbers of naturalized citizens and organizations assisting them have grown, researchers have amassed more extensive data that have sharpened our understanding of the many benefits that flow from individuals’ decisions to naturalize. Increasingly, Congress and other policymakers have responded by calling on USCIS to promote naturalization, make it more accessible to eligible legal permanent residents and encourage English language learning and</p>

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1258	USCIS-2010-0008-1099	Marjean Perhot, Catholic Charities Archdiocese of Boston	<p>Comment part 3: THE PROPOSED CHANGE WILL NOT FORWARD THE MISSION OF USCIS</p> <p>USCIS’s mission is to “efficiently and fairly adjudicat[e] requests for immigration benefits.” We find that the proposed change, for the aforementioned reasons and more, will be less efficient and will result in unfair adjudications for applicants.</p> <p>The elimination of means-tested benefits would result in duplicate work for the Government and in the removal of an already-efficient measure to determine inability to pay. USCIS would be calculating income based on similar if not the same income requirements for eligibility for means-tested benefits and would therefore be repeating the work of the Social Security Administration, the Department of Agriculture, the Department of Health and Human Services and others. By removing the most stream-lined option for demonstrating inability to pay the costs of filing fees, USCIS would be increasing the burden upon itself and decreasing its own efficiency, contrary to its stated goals as an agency and in this very Notice.</p> <p>Additionally, the increase of information being processed by the removal of the means-tested benefits option would lead to adjudications that are not as equitably adjudicated. Due to the higher level of sophistication in calculating income or financial hardship for USCIS, it stands to reason that the margin for error and/or Officer discretion would increase, making the process less fair for many applicants who would have applied based on receipt of means-tested benefits.</p> <p>The proposed change would therefore also extend the time needed for adjudication, adding to an existing backlog of applications to be adjudicated. Clearly, the proposed change goes against USCIS’s stated mission, instead making the process more inefficient and less stream-lined, allowing for higher margins of error and higher risks of unfair adjudications.</p>

ID	Comment.	Commentor	Comment
1201	USCIS-2010-0008-0956	Zenobia Lai, Catholic Charities - Houston	<p>Comment part 4: IV. This Proposal will negatively Impact the Ability of Individuals, Especially Those Who are Vulnerable, to Apply for Immigration Benefits for which they are Eligible.</p> <p>The filing fees associated with various immigration benefits can be an insurmountable obstacle for many immigrants. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles. A Cuban national, for example, paroled into the United States is eligible to apply for means-tested benefits. The parole does not on its own confer employment authorization; but in conjunction with the fee waiver based on the receipt of means-tested benefits. A Cuban parolee is able to obtain an employment authorization document and begin the process of integration and self-sufficiency. In theory, this same individual should be able to obtain a fee waiver based on hardship. In practice, obtaining a hardship-based fee waiver is substantially more difficult and inconsistently approved. Fee waiver application based on hardship requires evidence such as sworn statements, letters from social workers and refugee resettlement case managers in addition to any financial records available. Despite voluminous filing, hardship fee waivers are not reliably or consistently granted.</p> <p>Increasing the burden of applying for a fee waiver will further limit access to naturalization for otherwise eligible lawful permanent residents. The naturalization fee has gone up precipitously over the past 20 years, from \$40 in the 1990s to \$725 currently, making the quest for citizenship an unaffordable extravagance for many eligible Lawful Permanent Residents. Cabrini Center assists approximately one thousand qualified Lawful Permanent Residents in applying for naturalization each year. It is very common for many of them to express concerns about affording the fees during our initial consultation. A vast majority of these applicants, many former refugees, asylees or parolees have to remit money to support family members remaining in home country or refugee camps and are not in any position to save up for the application fees. Many of these individuals are able to apply for naturalization only with a fee waiver based on receipt of means-tested public benefits.</p> <p>In addition, the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job, being prevented from working or having wages and money taken by the abuser. Fee waivers are critical to ensuring survivors can access relief. The proposed removal of receipt of means-tested benefits as evidence to establish fee waiver eligibility may eliminate the only form of documentation that is not within the control of the abuser. By limiting the way a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p> <p>The proposed changes also exposes vulnerable communities to exploitation from unscrupulous individuals by only accepting fee waiver requests submitted on Form I-912. This is particularly true for individuals living in rural areas without substantial computer literacy, English proficiency, and access to immigration legal service providers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e. requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all of the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible. Under the</p>

ID	Comment.	Commentor	Comment
62	USCIS-2010-0008-0204	Vanessa Mathisen	Enacting this rule will deny thousands of low-income persons from the right to apply for immigration benefits for which they are facially eligible, thereby making the system to which they are legally entitled under federal law inaccessible. It ignores the disparity of the cost of living throughout the United States and requires the Service to evaluate each person's income eligibility rather than relying on systems that are in place by each state to reflect which persons are considered low-income in that particular state. This imperils thousands of individuals who should be able to apply for legal statuses to face deportation proceedings, which places an incredible and unsustainable burden on the immigration court system that is currently overwhelmed by a backlog of cases that is growing every day. If the government wants people to comply with immigration law, the solution is not to make doing so substantially harder than it needs to be when there is a perfectly good system already in place to manage this particular issue.
77	USCIS-2010-0008-0225	Peter Cole	This change is wrong. We should be encouraging our newest citizens as rapidly as possible and get them to be full citizens quickly and more able to get off of public benefits. The current system of vouching for a persons means is adequate and complete; creating a new system is wasteful and punitive and unnecessary.

ID	Comment.	Commentor	Comment
312	USCIS-2010-0008-0462	Benjamin Mejia	<p>Dear sir or madam:</p> <p>I oppose the proposal to terminate fee waivers with respect to prospective citizens. This country is founded on the principle of freedom, and persons seeking to join the American family should be encouraged, not discouraged, to do so.</p> <p>Additionally:</p> <p>The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p> <p>The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p> <p>Finally, this issue is personally meaningful to me, as I believe members of my family have sought and obtained fee waivers.</p>

ID	Comment.	Commentor	Comment
330	USCIS-2010-0008-0455	Marisa Thomassie	<p>Re: OMB Control Number 1615-0116; United States Citizenship and Immigration Services, Docket ID USCIS-2010-0008</p> <p>I'm writing to oppose the proposed change to eliminate means-tested public benefits to determine recipients of fee waivers. The USCIS reasoning that state-based assessments of income makes the recipients "unequal" across states is not accurate. Cost of living varies greatly by state - I would know, as I moved from Louisiana to Massachusetts and have seen the changes in my own budget. For similar reasons, minimum wage varies from state to state, usually above the federal standard. Why? Because in both these cases the federal standard is the lowest acceptable metric. The federal minimum wage of \$7.25 per hour barely allow for a living in Louisiana, let alone Massachusetts, which is increasing its minimum wage over the next few years up to \$15 an hour. This is double the federal requirement for a reason - poverty in Massachusetts has different numbers than in other states.</p> <p>For this and many other reasons (cost to taxpayers, burden on USCIS staff, duplicating means testing procedures, making the naturalization process difficult for low-income immigrants, etc.) I ask you to reconsider the proposed change. I've only directly addressed the reasoning listed by USCIS, but as other commenters will inevitably detail, this change has no foreseeable benefits to immigrants or those who process their papers. The results from this change would not uphold our shared values of democracy and a fair chance for anyone who enters the country to become a citizen, regardless of income level. If anything, we should be providing more access so that people don't fall through the cracks and join the ranks of the undocumented who have fallen out of status.</p> <p>Please reconsider, as there are better uses of our resources than making life harder for people who already have it difficult enough.</p>
370	USCIS-2010-0008-0495	Lesley McQuarrie	<p>Please don't enact this policy and make it even more difficult for potential immigrants. Aside from the cost, the paperwork is burdensome enough. Immigrans who come to this country poor often become the most innovative hard working Americans and for generations to come. It is not what Jesus would do. Please bring humanity back to our immigration policy. Immigrants are what makes this country unique. After all, the vast majority were all immigrants once.</p>

ID	Comment.	Commentor	Comment
955	USCIS-2010-0008-1031	Riddhi Mukhopadhyay	<p>I am urging the Trump Administration to immediately withdraw the proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I am a naturalized U.S. citizen. Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages, than their non-naturalized foreign-born peers. Naturalization allowed me to complete my education, become a lawyer who now provides legal aid to survivors of sexual assault. Naturalization allowed my family to stay together in the U.S. and make contributions to our communities in the U.S.. Naturalization allowed my family to support my younger siblings who are now practicing physicians, taking care of the healthcare needs of the public. The U.S. should base its naturalization process based on a persons character and merits, not on their ability to pay. Creating a complicated, technical process that in no way improves the USCIS backlog and creates greater financial hardship for green card holders who are contributing to our communities in more ways than just financially serves no other purpose than to bar deserving individuals from becoming naturalized. Everyone deserves an opportunity to be a part of the American Dream, not just the rich.</p>

ID	Comment.	Commentor	Comment
958	USCIS-2010-0008-1034	Suzanne Rudalevige, HopeGateWay United Methodist Church	<p>My name is Suzanne Rudalevige. I am a naturalized citizen and remember well that when I came into this country and when I became a citizen, immigrants were not expected to pay for the bureaucracy of the USCIS. Fees were low and reasonable. I now work with new immigrants who come in with enormous skills and certainly in Maine their average education is higher than that of the native born. They come having fled from their home countries and left everything they had in terms of wealth behind them. They are ready to start over and work for this country. I want them to be treated fairly and with dignity.</p> <p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. There is no need to make the application for a fee waiver so complicated when the current system works perfectly well to show who needs a fee waiver. The only reason would seem to be that this country does not wish to embrace those who have successfully become permanent residents as citizens unless they can pay high fees. The rights and privileges of becoming a citizen like the right to vote should not be based on the ability to pay or the ability to fill out a long and complicated form- one that would intimidate many a native born citizen. It is always disheartening to see discriminatory policies being proposed.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. This will slow the rate of review down even more than the current enormous backlog</p>

ID	Comment.	Commentor	Comment
1330	USCIS-2010-0008-0999	Neal Dudovitz, Neighborhood Legal Services of Los Angeles County	<p>Comment part 2: 2. The rule would result in missed application deadlines and lost opportunities to apply for and receive immigration benefits.</p> <p>This increased evidentiary burden will also result in applicants missing crucial deadlines for immigration benefits. Given that evidentiary requirements to prove inability to pay are vague, applicants will not know what documents are adequate proof for USCIS. And, again, if an applicant relies exclusively on means-tested benefits, she may not have any other documentation to submit. If an applicant unintentionally submits insufficient proof of inability to pay her fee, her fee waiver request will be denied. Notice of the denial of the fee waiver request is likely to take at least a month to issue and return to the applicant, if not longer, depending on the volume that USCIS is confronted with at any given time. In this passage of time, applicants will probably have missed important deadlines related to their applications or their immigration status.</p> <p>In addition, if a deadline has not yet passed, following receipt of the denial, applicants may not have enough time to resend their application with a new fee waiver request and additional documentation before the filing date expires. This creates a second possibility for important deadlines to be missed and for applicants to lose access to immigration benefits they are legally entitled to. Our advocates have already witnessed several fee waiver denials for applicants who face a financial hardship or fall below the 150% Federal Poverty Level because they failed to meet the ambiguous evidentiary burden for a fee waiver. Removing the option to rely on proof of a means-tested benefit for applicants who have no other income, will increase denials and impact more applicants.</p> <p>This will inadvertently create an immigration system that favors immigrants who have the ability to pay and leaves low-income individuals in the shadows without the financial means to obtain lawful status.</p>

ID	Comment.	Commentor	Comment
1196	USCIS-2010-0008-0789	Jean Bruggeman, Freedom Network. USA	<p>Comment part 3: 2. The Proposed Revisions will Impose Additional Barriers on Trafficking Survivors</p> <p>Foreign national survivors of human trafficking and other forms of exploitation and abuse face tremendous barriers to accessing services and support. Many survivors have developed reasonable fears of law enforcement and government agencies due to their experiences with abusive governments in their home countries. Abusers and traffickers rely on and exploit these fears, telling their victims that the US government will not protect them and that they will face even worse abuse in their home country. Additionally, few foreign nationals understand the US legal and social services system and know that protections and services exist and how to access them. Recently, trafficking survivors are expressing increased fear of the US justice system, and are even less likely to come forward for services and protection.⁶ For these and other reasons, USCIS has never come close to approving the statutory maximum of 5,000 T Visas in a fiscal year. The highest number approved was under 900, in 2013, and has been dropping ever since.⁷ Therefore, it is especially concerning that USCIS would be increasing the barriers to fee waivers for ancillary-forms like work permits and admissibility waivers for trafficking survivors. As discussed above, few survivors of human trafficking have been paid a fair wage, have evidence of their wages, or have filed tax returns. For these reasons, flexible fee waiver guidance and practice have been and are absolutely essential for immigrant survivors to access critical protections created by VAWA and the TVPA.</p>

ID	Comment.	Commentor	Comment
8	USCIS-2010-0008-0155	Amy Campbell	<p>In my line of work I have seen this Fee Waiver benefit abused. I have seen individuals abusing this program by lying on their welfare applicants about their marital status which allows unmarried women with children, to receive food stamps even though they reside with their children fathers but avoid marriage to be able to qualify for benefits.</p> <p>Older adults, most of whom receive welfare, apply for naturalization using fee waivers to avoid losing social security benefits and not for love of country.</p> <p>Newly arrived Cubans lie on their asylum applications claiming Credible Fear of Prosecution when in reality they are economic migrants, and as soon as they are admitted into the U.S., they are encouraged by friends and family to apply for "La Ayuda" (the help) which translate into welfare benefits. They remain receiving benefits until they become naturalized citizens although without any English skills. Many of these new resident aliens, work under the table, and declare income taxes just enough to qualify of Obama Care and for Welfare Benefits.</p> <p>Central American mothers, particularly from Guatemala, bear many children because they know that the state provides them with an average of \$500 in food stamps, free daycare, in addition to medicaid and the tax credits of upwards of \$8,000 in tax refunds.</p> <p>So in essence, I believe that the only individuals that should be granted a Fee Waiver is NONE unless they can proof, with evidence, that they have worked and paid taxes during the previous 20 years.</p>
18	USCIS-2010-0008-0164	Raheel Hayat	<p>As an Immigration Attorney who works with marginalized communities on a daily basis, I cannot begin to highlight the negative impact this will have in providing access to immigration relief for low income individuals. Many immigrants rely on the means tested benefits requirement to be able to apply for immigration adjustment or relief which can normally cause thousands of dollars in fees. It is unconscionable that USCIS is using this tactic to punish poor families. For the sake of thousands of families relying on access to immigration justice, I hope this proposal does not pass.</p>

ID	Comment.	Commentor	Comment
26	USCIS-2010-0008-0173	Remigio N Torres	The Fee Waiver should remain in place. Removing it would be unnecessarily cruel. All immigration fees are already prohibitively expensive.
27	USCIS-2010-0008-0178	Marisol Tapia	<p>I am against the proposed changes to the current fee waiver policy. The changes being proposed hurt the most vulnerable groups in our country, the very poor. It seems to me that the only purpose behind these changes is to punish poor families. Why do I think this? Well, if poor families are no longer able to use means-tested benefits to prove they are low-income, then it makes it almost impossible for them to prove they are poor. Many families that don't make enough money to file taxes will have no way to prove they are poor, as a benefits letter showing they are receiving public benefits will no longer be accepted as prove, if these changes are approved.</p> <p>Please don't punish low-income families for being poor. It is our duty to help those in need access immigration services through fee waivers. We should be looking at ways to make it easier for people, not harder.</p>
30	USCIS-2010-0008-0170	Hannah Eash- Gates	<p>This rule will make fee waiver applications more complicated and uncertain, while preventing some deserving applicants from being approved. Many people do not have provable income; indeed, many do not have income at all because they are disabled and ineligible for benefits, they do not have work authorization and they are trying to obey the law, or many other reasons. The only way many people are able to prove that they need a fee waiver is by providing proof that they or someone in their household receives a benefit (e.g. WIC for their U.S. citizen child). Many people would be cut off from even applying for an immigration benefit they qualify for simply due to cost. It is discriminatory against the very poorest people. Wealth should not be the determining factor for who is able to access immigration benefits. This rule change would be totally unnecessary, arbitrary, and the results would be nothing short of cruel.</p>

ID	Comment.	Commentor	Comment
40	USCIS-2010-0008-0190	Naomi Kim	I oppose the proposed revision because many immigrants rely on the means tested benefits requirement to be able to apply for the fee waiver. It is unconscionable that USCIS is using this tactic to punish poor families since a large portion of these people will be unable to prove their income status because they are not required to file federal income taxes. This would leave them with no way to prove their income and qualify for the fee waiver.
41	USCIS-2010-0008-0182	Patricia Thompson	I oppose the proposed revision. Many immigrants rely on the fee waiver, and it is unconscionable that USCIS is using this tactic to punish poor families.
53	USCIS-2010-0008-0196	Victoria Raya	<p>The emergent history of the United States and its relationship to incoming immigrants and refugees has ALWAYS been one of acknowledging that those who come to our borders and our shores are coming for a better life. They usually are not equipped with the language, education or resources to easily manage a transition into this country. Thus, as we evolve in our understanding of the issues families and always, the most vulnerable elderly and children, will face, we know we must step up as Americans, as the people with the unbelievable good fortune to have found ourselves either born, raised or after much effort, finally successfully navigating the systems we inherit.</p> <p>To remove this program as the costs rise sends one powerful message: we do not want your poor, we do not want your masses yearning to be free. We no longer hold to the truths upon which we were founded.</p> <p>We have the means, we must be just and we must - those of us to whom plenty has been given - do and give more.</p>

ID	Comment.	Commentor	Comment
56	USCIS-2010-0008-0202	Emily Abraham	<p>Working for a nonprofit legal services organization in California, I work with many low-income individuals. These individuals rely on the ability to prove their eligibility for fee waivers based on their receipt of means tested benefits. Removal of this evidentiary option will inevitably prevent many immigrants from filing eligible applications. It will also result in the increase of rejected applications and/or denied fee waivers. Using means tested benefits to prove eligibility is a simple way of testing and proving an applicants' income and the time it will take for adjudicators to read through tax returns, check stubs, and other forms of evidence of income will increase substantially. This will outweigh any costs savings by this proposed rule.</p> <hr/>
72	USCIS-2010-0008-0216	Jarlath Grant Lyons	<p>Assigning the qualification of the fee waiver to a household income assumes that all persons within that household are of the same level of employability. Using this unrealistic metric will result in unfair punishment for many who come to this country in search of opportunity.</p> <p>Immigrants are extremely hard working, and this proposed revision will not only harm those who will no longer have access to the fee waiver, but our communities as well.</p> <p>Please reconsider this harmful revision.</p>

ID	Comment.	Commentor	Comment
95	USCIS-2010-0008-0250	Jamie Clayton	<p>I oppose the change to the eligibility requirements for fee waivers. The change would make most of those immigrants applying for the fee waiver no longer eligible, this would effectively prevent many immigrants, specifically those seeking asylum, from applying for permanent residency as the costs would be prohibitive. Someone fleeing violence, persecution, or poverty is unlikely to have the resources to pay the fees required without a waiver. This change effectively discriminates against low-income immigrants and runs counter to everything this country is founded upon. Had many of our ancestors been required to pay an exorbitant fees when they immigrated to the USA, most of them would have been barred. By barring a large segment of immigrants we are effectively forcing them into the shadows, as many cannot return to their home countries. We are effectively forcing a person into the position of an undocumented immigrant, further exacerbating this problem without society, starving these people of basic human rights, and depriving them of protections they would have as recognized permanent residents of this country.</p>
100	USCIS-2010-0008-0231	Emily Ausema	<p>I oppose this change in fee waiver policy. I work with immigrants and refugees, many of whom rely on benefit statements to prove their income. Eliminating the fee waiver will disproportionately affect people with low incomes. It will also affect many refugees and immigrants who have already faced hardship and trauma and simply want to seek a better life for themselves and their families.</p> <p>Please maintain the fee waiver for low-income families and individuals.</p>

ID	Comment.	Commentor	Comment
124	USCIS-2010-0008-0265	Kaley Karaffa	I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application. This proposed revision goes against core American ideals.
141	USCIS-2010-0008-0281	Sarah Baranik	I am concerned about the proposed fee waiver rules. I am concerned about these rules because the fees are already quite high. The proposed rules would adversely impact those living in poverty; those who are disabled; those who are young; and others who are most vulnerable. It is important that individuals who are unable to pay for these fees be able to waive these fees and prioritize the essential services they need, rather than use their funds for administrative fees. Waivers are necessary and fee exemptions should be made available for individuals.
148	USCIS-2010-0008-0299	Joyce Almerigi	The cost for citizenship is exorbitant for middle-class families, at it stands, preventing people from applying. Again, if the fee waiver is discontinued, elderly and disabled people will be prevented from coming to the U.S., and their families, who may want to come for a better life, will not be able to do so because they do not want to leave their elderly and/or disable people behind. This law is indicative of privilege, which applies to a select few in relation to the masses.

ID	Comment.	Commentor	Comment
154	USCIS-2010-0008-0297	Stephanie Lubert	<p>The proposed Fee Waiver rule would limit who qualifies for a free waiver. The filing fee for USCIS Form I-485, the form required for immigrants who want to apply for their green card, is \$1,140. The filing fee for Form N-400, the form required for those applying for U.S. citizenship, is \$725. These fees periodically increase. For some people, these filing fees can be prohibitive. Immigrants could be barred for ever becoming naturalized citizens because of the inability to pay filing fees. This forces people to live in limbo between status.</p> <p>Many immigrants are legally receiving means tested benefits. USCIS should continue to rely on proof of a means tested benefit when deciding if a person qualifies for a fee waiver. Applicants have already been vetted by state agencies with expertise in assessing the income and needs of families.</p>
163	USCIS-2010-0008-0292	Karel Traister	Do not make it harder for immigrants to be eligible for means tested benefits and receive fee waivers.
169	USCIS-2010-0008-0316	Jenny Hayes	I am opposed to changing the process for proving eligibility for this fee waiver. \$725 is a lot of money for many people. Fee waivers are important to help good but poor people who want to apply for citizenship. We need to keep this process accessible for these folks. Please do not change the verification requirements. Thank you.

ID	Comment.	Commentor	Comment
189	USCIS-2010-0008-0335	Barbara Short	<p>I oppose this suggested change to regulations.</p> <p>The government, which under this president does nothing to encourage immigration into the United States, says that the following is the reason for the change:</p> <p>USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver.</p> <p>I doubt it. I believe that Trump and his sidekicks are isolationists and will find any little back-door route to limit immigration. Or they would like to limit it to white christian rich people like them.</p> <p>However, in reality:</p> <p>The move would make most of those who apply for the fee waiver no longer eligible to do so, forcing them to forego important immigration protections like asylum due to the prohibitively expensive cost of filing the required paperwork. The proposal is a back-door method of limiting family immigration and reunification and could suppress naturalization rates among immigrants.</p> <p>So, on the record, I oppose this change.</p>
194	USCIS-2010-0008-0340	Jessica Pearlman	I object to the proposed change; this would make it harder to obtain a fee waiver. It is unfair and unjust.
212	USCIS-2010-0008-0398	Sarah Hufbauer	<p>As a family physician and mother of two, I know we can do better.</p> <p>Elders on fixed incomes need this fee waiver maintained.</p> <p>thank you.</p>
215	USCIS-2010-0008-0377	Susan Barnett	I oppose the proposed fee waiver rule. We should be encouraging, not discouraging, immigrants to find paths towards being self supporting. This rule seems punitive.

ID	Comment.	Commentor	Comment
222	USCIS-2010-0008-0366	Chris Marks	I believe these changes in the fee waiver system will harm the most vulnerable people who are turning to us for help. Every tradition of decency and compassion, springing from all of our religious and cultural foundations, demands that we protect the most vulnerable among us. We are denying our better angels when we let a fear-mongering government stir up our weakness for sentiments of hatred.
224	USCIS-2010-0008-0392	Simon Knaphus	I oppose the change to this policy. Fee waivers for low-income immigrants are not a significant burden on our system and are consistent with the values that make our country great.
233	USCIS-2010-0008-0394	Angela Engbrecht	I am against the proposed revision because it will unfairly impact immigrants with the lowest incomes. These are people that rely on the currently accepted methods to verify their income so that they can apply for the fee waiver that they desperately need. USCIS would do a disservice to these families by eliminating current verification methods, thus making it even harder for them to apply for citizenship. Thank you for your time in reading this message.
235	USCIS-2010-0008-0371	Lisa Seifert	<p>Please dont make it harder to qualify for fee waivers. I am a lawyer working with very low income people who are going through an immigration process. As they get better status they do better. Please let them start without a fee barrier.</p> <p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p>

ID	Comment.	Commentor	Comment
236	USCIS-2010-0008-0401	Melanie Duhon	I am writing in regards to the proposal to eliminate honoring public benefits in qualifying for fee waivers for citizenship applications. Making citizenship impossible because someone can't pay for it is Unamerican and unfair. Please continue to allow applicants to use their benefits to attain fee waivers.
238	USCIS-2010-0008-0375	Maria Hodgins	We shouldn't prioritizing which immigrants to admit into our country based on who is able to pay. That would be prioritizing the rich over the poor, and many people who come to this country cannot afford to pay the filing fee. Filing fee waivers are incredibly important because they help equalize and facilitate the immigration process.
240	USCIS-2010-0008-0383	Lillian Lahiri	It is unconscionable to place a financial barrier to immigrants seeking asylum or other assistance or remedies they may be seeking. Fee waivers should be available to all in need of them.
243	USCIS-2010-0008-0359	Jane Leavitt	<p>I object to the proposed change in providing proof of income status because immigrants with low income will become ineligible for fee waiver. Many of the affected people do not file federal income taxes because they are not required to and therefore will be unable to provide the required paperwork currently accepted options to verify their incomes. If the verification of income changes many people will be unable to qualify for the fee waiver. object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver.</p> <p>It is for this reason that I oppose this change in the application fee waiver policy.</p>

ID	Comment.	Commentor	Comment
257	USCIS-2010-0008-0365	Susan Klastorin	<p>Immigrants form the backbone of our democracy. The process of immigration should be welcoming, not one of extra hardship.</p> <p>The N-400 requirement of \$725 application fee to become a U.S. citizen is a HUGE barrier to those who are simply trying to provide food and shelter for their families. The proposed revision to the fee waiver process is simply WRONG and unfairly punishes the elderly and families with very low incomes.</p> <p>Please keep the current waiver methods in place.</p> <p>Thank you.</p>
272	USCIS-2010-0008-0432	Susan Richardson	<p>I oppose termination of the fee waiver for low income immigrants. The measure of the health of a society is how they treat the most vulnerable among them. Because of egregious errors of judgment in US Foreign Policy in the past, we have left many countries unstable and dangerous. We have to take responsibility for these actions and welcome those who are fleeing poverty and danger. Many are willing to shepherd these immigrants so that they become an asset to our nation. Susie Richardson</p>
275	USCIS-2010-0008-0426	Paul Baxter	<p>Neither public safety or the public interest is served by this needlessly draconian measure. Punishing the poorest of asylum-seekers simply emphasizes the pointless cruelty of the current system.</p>
278	USCIS-2010-0008-0438	Yraina Fermin	<p>This program is a big help to immigrant who incomes are very low.</p>

ID	Comment.	Commentor	Comment
298	USCIS-2010-0008-0419	Elaine Nonneman	I worked for years tutoring English with mostly Asian families. I learned from their accounts that, particularly elders and spouses would long postpone applying for citizenship when they were fully eligible, because costs of the application process and language instruction were a financial burden they could not impose on their families'limited resources. The current USCIS proposal to change eligibility for fee waivers for low-income immigrants increases what is already a barrier. It is, on its face and in its terms, blatantly discriminatory policy toward poor migrants, those seeking asylum for which they have valid cause and all who are somewhere in the process of gaining permanent residency and U.S. citizenship. This country needs immigration policy that serves all parts of our economy, high tech to service and production sectors and recognizes the value of community stability when immigrant families are united.
303	USCIS-2010-0008-0416	Toni Long	I strongly oppose this proposed change because it will hurt the most vulnerable people who are applying for U.S. citizenship, as some do not file tax returns. This new proposed methodology does not account for varying cost of living across the county. State benefit agencies are best equipped to establish "financial hardship" in their areas. Please do not waste USCIS resources! As a U.S. taxpayer myself, I find this offensive. It disadvantages the most vulnerable population and increases costs of government to implement the change. The new form is expected to take over 6 times the time to complete, so legal services that assist this vulnerable population with completion of their forms will be assisting way less people in their workshops. Thus, I oppose this proposed change because it increases the cost of government, it discriminates against the most vulnerable populations, and it negatively impacts organizations who assist this population with completion of the required forms.
305	USCIS-2010-0008-0458	Donna Banting	Please keep the fee waiver for immigrants who do not have adequate funds for such payment.

ID	Comment.	Commentor	Comment
307	USCIS-2010-0008-0461	Danny Fong	Fee waivers are standard and much needed assistance to the poor and vulnerable in our community. Just as the vulnerable rely on fee waivers for college board testing and college applications, these waivers are also needed for green card and citizenship applications. If the fees for these applications had not been increased to such high costs in the past decades, they would not be needed. But they are very high for low-income people, thus the fee waiver is necessary. I am against the propose change.
310	USCIS-2010-0008-0471	George Zenker	have experience working with immigrant communities. Accessible fee waivers are a vital part of allowing due process and human rights for every person who would like to apply for a fee waiver. Fee waivers help low-income workers, parents, and others who contribute economically, socially, and culturally to our society to be able to access immigration forms. Making the process of attaining a fee waiver longer and more difficult (particularly for the elderly, for the disabled, the economically disadvantaged, and others who don't file tax returns) will negatively impact thousands of people and it is completely unnecessary to make the process harder, when there are already so many fees and obstacles associated with the immigration process.
319	USCIS-2010-0008-0468	Dray Nelson	I object to the proposed revision to the fee waiver process. Many low-income individuals rely on means-tested benefits letters to prove their eligibility for fee waivers. Those in the lowest income brackets often do not file taxes because they are not legally required to do so. Making this the only way prove eligibility puts up yet another barrier for these people. There is no reason for USCIS to put up further restrictions for those in the most marginalized income brackets. This also creates a barrier for those who cannot work and therefore file taxes/prove income due to disability, mental health issues, family structure, linguistic isolation, transportation limitations and so on.

ID	Comment.	Commentor	Comment
329	USCIS-2010-0008-0476	Cecilia Borges Farfan	I do not support the proposed revision to the fee waiver guidelines. People who earn below the required amount to file taxes will no longer be able to prove that they are eligible for a fee waiver if taxes are the only way to prove eligibility. Please reconsider this revision.
341	USCIS-2010-0008-0505	Alexandra Olins	<p>This proposed rule change is completely unjustified. What is the rationale for making it harder for low-income immigrants to PROVE their eligibility for something that they are eligible for? What is the problem this proposed policy change is seeking to address? If there is no problem with the current standards for proving eligibility, why would we want to change anything? Is the current system broken? If not, why does it need fixing?</p> <p>If the proposed change is implemented, it will make it MORE complex for people to prove their income eligibility for the fee waiver. Presently, they can use a benefit letter which is issued by the state in which they reside. Their benefit eligibility has been adjudicated by someone who is trained to do so, who does income verification for a living, typically for the state's department of health and human services. If the benefit eligibility is limited to income tax forms, then USCIS employees will have to be trained to review such forms, and calculate eligibility based on family size and composition, and various other factors--factors that have already been assessed at the state level if the person is on public benefits. It doesn't make sense to ask USCIS agents to make this assessment when the determination has already been made at the state level.</p> <p>This proposed rule change is a solution in search of a problem. The current system is working, and working well. The fee waiver does not cost the American tax payer anything. It is paid for by fees paid by USCIS applicants. It will cost the American tax payer something if USCIS agents spend their time adjudicating income eligibility applications for the fee waiver. This makes no sense. Keep the eligibility criteria as they are--the system is working as it is!</p>

ID	Comment.	Commentor	Comment
348	USCIS-2010-0008-0506	Andrew Hays	<p>As a friend of many immigrants, I can attest to the positive additions that they make to our society. They start and maintain businesses at a level higher than the average American, for example.</p> <p>This proposed change to the fee waiver program is unnecessary and self-defeating. We should be creating an environment that is MORE welcoming, not less, to immigrant trying to become integrated into our society. This proposed reg is especially unwise because of the high barrier it creates for immigrants who don't make enough money to file taxes. It creates a huge headache--both for the immigrant and those helping them--to prove their eligibility for a fee waiver based on their income, rather than their receipt of a benefit.</p> <p>I'd strongly urge the preservation of the current fee waiver program.</p>

ID	Comment.	Commentor	Comment
354	USCIS-2010-0008-0511	Sheila Gardner	<p>My name is Sheila Gardner. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. Please dont make it harder for immigrants to naturalize.</p> <p>I am a volunteer for OneAmerica, a 501(c)(3) organization that helps people apply for U.S. citizenship with free assistance from volunteer attorneys. Over the years, many of the clients we serve have been eligible for fee waivers based on receipt of public benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people.</p> <p>I oppose the rule for this reason: Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p>
485	USCIS-2010-0008-0602	John Horn	<p>I oppose these changes to the fee waiver regulations because they disadvantage the most disadvantaged applicants.</p> <p>Thank you, John Horn</p>
553	USCIS-2010-0008-0699	Kayla Weiner	Leave the money in the community. Don't hurt immigrants any more.!!!!
577	USCIS-2010-0008-0730	Imogen Carr	Citizenship applications for the United States should not discriminate based on wealth. The fee-waiver is vital and should not discontinued
580	USCIS-2010-0008-0682	Linda Bateman	Poorest of the poor are hurt by these fees. Please allow waivers.
653	USCIS-2010-0008-0973	Lia Preftes	Regarding OMB Control Number 1615-0116,Docket ID USCIS-2010-0008: I am writing to strongly oppose the proposed policy change. This will cause unnecessary hardship for low-income citizenship applicants. The current fee waiver system should not be changed.

ID	Comment.	Commentor	Comment
690	USCIS-2010-0008-0851	Cara Mbaye	The benefit we as a country receive from immigrant work and intelligence is what our country was founded on. Immigrants come to cash in on the American dream, they have no desire to position themselves in welfare nor to be a public charge. The benefit of their presence far out weighs the possibility of them receiving assistance temporarily. Please DO NOT PASS THIS REGULATON!
720	USCIS-2010-0008-0966	Blanca Enriquez	Myself to vote and to being able to get better paying job. There is many family that with the salary can only make enough mony to live with everything getting very expensive.
814	USCIS-2010-0008-0960	Mathias Argenyi	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
833	USCIS-2010-0008-0816	Jeremy Meyer	This heartless rule will make it nearly impossible for many immigrants to prove that they are eligible for fee waivers, effectively denying them the opportunity to naturalize. There is simply no basis for this rule change other than outright bigotry. I urge USCIS to not adopt this rule.
1053	USCIS-2010-0008-1173	Michael Appel	I am opposed to changes that would increase the difficulty in obtaining a waiver of fees for citizenship.
1054	USCIS-2010-0008-1174	Danielle Kuhlmann	I do not support the proposal to change requirements to obtain a USCIS waiver. There is no reason to further limit access to assistance for those who cannot afford fees. The current rules are sufficient.

ID	Comment.	Commentor	Comment
216	USCIS-2010-0008-0406	Christina Guros	<p>I strongly oppose the rule change proposed by US Citizenship and Immigration Services (USCIS) to the fee waiver process because it irresponsibly and unnecessarily weakens other federal programming.</p> <p>The Department of Justice (DOJ) runs a Recognition and Accreditation (R&A) Program through its Office of Legal Assistance Programs (OLAP). The entire DOJ Accreditation and Recognition system is designed to assist low-income and indigent clients by allowing non-attorney staff at nonprofit agencies to earn authorization to represent low-income immigrants in immigration matters. Through the R&A Program the federal government created an entire system to assist low-income immigrants with their immigration cases.</p> <p>There are currently Recognized agencies and Accredited Representatives in all 50 states and Washington, D.C. serving hundreds of thousands of immigrants with their immigration cases each year. DOJ OLAP regularly accepts applications for recognition and accreditation and updates their roster of agencies and accredited individuals every two weeks. The roster from November 5, 2018 shows thousands of recognized agencies and accredited representatives; the list of recognized agencies is 178 pages long, and the list of accredited representatives is 187 pages long (https://www.justice.gov/eoir/recognition-accreditation-roster-reports). These are all tax-exempt nonprofit agencies who must prove to the DOJ that the majority of their clientele are low-income and that they provide services for free or through a nominal fee structure.</p> <p>Yet the fee waiver changes gut the DOJ recognized agencies ability to assist low-income and indigent clients, by taking from them the means to file many immigration cases on their behalf. Clients accessing free and low-cost legal services are, by DOJ requirements, low-income. Many of their families rely on public assistance to survive, either short-term or for longer periods. If those reliant on public assistance without adequate proof of income are unable to apply for immigration benefits through these nonprofit service providers because a fee waiver approval becomes too hard to obtain, the clients, the agencies, and the low-cost immigration legal services infrastructure suffer.</p> <p>To subsidize low- or no-cost legal services, most agencies rely on grants and contracts to deliver services. Contract reimbursements and grant renewals are most often reliant upon completing a certain number of cases or assisting a certain number of families. If a significant portion of the clientele served by the nonprofit sector are unable to file immigration applications because they are unable to provide the new proof for a fee waiver due to this rule change, their service numbers will fall and therefore their funding sources will also. When funding is cut, so are jobs, and the availability of low-cost legal services decreases for all families. Lost jobs also have significant impacts for low-income and housed</p>
407	USCIS-2010-0008-0553	Jessica Figueroa	<p>The fee waiver helps many of the low-income families that we help. Disregarding the fee waiver means tested benefits will prevent more than half of the families that we serve to become self-sufficient.</p>

ID	Comment.	Commentor	Comment
466	USCIS-2010-0008-0623	Beth Stickney	<p>I oppose this proposed change to how USCIS processes fee waiver requests.</p> <p>I am an immigration lawyer who has worked with low-income individuals for decades. I well remember the fee waiver process that existed prior to the change that allowed individuals seeking fee waivers to submit proof that they are receiving public benefits as the proxy for supplying detailed information regarding their income/resources and their expenses.</p> <p>The old process, which this proposed change would return to, was extremely time consuming and allowed for more arbitrary decision-making by USCIS officials.</p> <p>All individuals who are receiving public benefits have already had to jump through hoops to provide evidence of their income/resources and expenses to state officials who administer state and federal public benefits programs such as SNAP, Medicaid, and housing assistance programs. While there may be slight variations in income eligibility levels from state to state, in every state, a person who is eligible for public benefits is extremely low-income.</p> <p>USCIS officials should be able to continue to use proof that a person is currently receiving public benefits at the time that they file their immigration application as definitive proof that the person is sufficiently low-income to qualify for a fee waiver. This will reduce the time USCIS officials must spend to determine if a person is low-income, saving the government, and taxpayers, money.</p> <p>The current process that allows for submission of proof of current receipt of public benefits also reduces that possibility of subjectivity resulting in two similarly situation people receiving different decisions - one person being granted, and the other being denied, the fee waiver.</p> <p>This change should be soundly rejected and the status quo that allows individuals to submit proof of current public benefits receipt, with that evidence creating a presumption that the person should be granted a fee waiver, should be retained.</p> <p>Thank you for your consideration of this comment.</p>
571	USCIS-2010-0008-0700	Alexander Bergstrom	<p>The fee waiver must not change. The point of the waiver is to assist people with relatively few means, not to assist people with access to specific paperwork. In the interest of that intent, proof of means-based assistance is plenty adequate, given the criteria for receiving it. New exemptions are clear attempts to harm people, rather than help.</p>
647	USCIS-2010-0008-0854	Richard Jacobs	<p>Receipt of public benefits is a simple and effective metric for determining applicant means and eligibility for a fee waiver. Why should it be eliminated as a test? I cannot imagine any proper basis for doing so.</p>

ID	Comment.	Commentor	Comment
670	USCIS-2010-0008-0888	Derrick Exner	The removal of means testing to facilitate filing documents is counterproductive unless you actually want to prevent poor people from working with USCIS. If you actually want that result, then the proposed change is simply mean spirited.
705	USCIS-2010-0008-0970	Jensa Woo	I write as a concerned U. S. citizen. I do not support the proposed elimination of receipt of means-tested benefits as basis for immigration application fee waivers. I believe that this would be yet another barrier for those who want to become U.S. citizens. I am the offspring of immigrant parents who worked 6 days a week in order to provide for our family, to give us a good home and financial stability. I also have friends with family members who wish to become U.S. citizens and who are doing the hard work of earning a living and making ends meet for their families. I am grateful that under the current application process, individuals may apply for the fee waivers. I believe that this provision should remain part of the application process.

ID	Comment.	Commentor	Comment
708	USCIS-2010-0008-0895	Jacob McCoy	<p>I oppose the proposed fee waiver changes in USCIS Docket ID USCIS-2010-0008, OMB CN 1615-0116. I am an immigration attorney working in removal defense, and I have volunteered preparing immigration petitions for pro bono clients. I have seen how difficult it is for clients to save up for legal fees, and I have seen many clients qualify for fee waivers using means-tested benefits.</p> <p>It would be less efficient for USCIS to eliminate this way to qualify for a fee waiver. It is hard to see how this change in collection of information has practical utility to USCIS, but it will create an obstacle to applicants who will need to find greater amounts of financial proofs to document their income or lack thereof.</p> <p>In the supplemental information "Reason for Changes" of this notice, it is alleged that "USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver." It is entirely believable that applicants' income levels vary from state to state in Seattle, Washington, where I practice, the minimum wage is \$15 per hour, more than twice the federal minimum wage. Each state has the ability to create and adapt state-level public benefits programs to meet their residents' needs.</p> <p>This onerous change cutting out the receipt of means-based benefits as a way to qualify for a USCIS fee waiver will only make applicants' burden greater, as each of them will have to dredge up written proof of their financial situation, where many work cash-based jobs or do not have extensive written records of their income.</p>
834	USCIS-2010-0008-0901	Brianna Kiarie	<p>If only tax returns can be used to verify income for fee waivers, people with the lowest incomes will be excluded. Many are not required to file federal income taxes and would therefore have no way to prove their low income status. This keeps people from accessing fee waivers which they qualify to receive. I oppose the proposed changes for this reason.</p>

ID	Comment.	Commentor	Comment
1167	USCIS-2010-0008-0941	Kham Moua, Southeast Asia Resource Action Center	<p>Comment part 4: The Proposal Increases Barriers to Naturalization</p> <p>Many Southeast Asian immigrants and refugees rely on fee-waivers to naturalize. The filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. Any opportunity to mitigate the costs associated with filing should be designed to ease, rather than exacerbate, these obstacles. The application requirements and additional evidence necessary derived from this proposal increases the complexity for filing Form I-912. Given the already high rates of LEP individuals in SEAA communities, this will likely lead to higher rates of mistakes in the process for these 9 applicants. The complex form for a fee waiver and the already daunting naturalization fee will likely decrease the ability of LPRs from applying for U.S. citizenship.</p> <p>Additionally, the naturalization fee has gone up 600% over the last 20 years, pricing many qualified green card holders out of U.S. citizenship. As mentioned above, there is a high rate of poverty in SEAA communities. However, many SEAA LPR families face additional financial hardships in addition to their low-income. Since 1998, at least 16,000 SEAA community members have received final orders of deportation to the countries they originally fled as refugees. Many of these individuals are the primary breadwinners in their families, and their 10 detentions and deportations have further impoverished their already poor families, primarily women and children. Removing means-tested benefits as evidence for a fee waiver only further 11 reduces the ability of the remaining family members from naturalizing. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating a process inaccessible to many SEAA individuals.</p>

ID	Comment.	Commentor	Comment
1381	USCIS-2010-0008-1066	Vichal Kumar, NDS Harlem	<p>Comment part 2: 2. Increasing the required forms for a fee waiver and adding supplemental documentation will create further delays in processing times and result in unnecessary rejections.</p> <p>The proposed form adds unnecessary complication to an already challenging process. DHS has conceded that USCIS already lacks the resources to timely process the millions of outstanding cases. While purportedly meant to streamline and unify the fee waiver process, the additional documentary requirement will serve to slow down an already overburdened system. Moreover, the delays will further deny access to immigration benefits or naturalization for otherwise eligible applicants.</p> <p>The means-based test has been an effective method to ensure applicants are eligible for a fee waiver. It requires the production of documentation from agencies an applicant maintains regular contact with for the continuation of their benefit. Adding a requirement which forces the must vulnerable applicants to seek documents from additional agencies will not provide uniformity in the fee waiver application, but, instead likely result in more mistakes and errors in the fee waiver applications. Together, the additional application and the likely result of more erroneous rejections will overburden an already struggling system.</p>

ID	Comment.	Commentor	Comment
712	USCIS-2010-0008-0756	Sean Power	I strongly urge USCIS to maintain its currently policy of allowing applicants' receipt of public benefits qualify them for a citizenship application fee waiver. To receive these public benefits these same applicants needed to show their income. Thus, it is duplicative in effort and a waste of taxpayer resources for the government to repeat this same effort. Also, many applicants are currently exempt from filing taxes due to their low incomes. This makes this proposal even more non-sensical. Why make people do something they don't need to, in order to prove something already being calculated by another method? The only logic I can make of this is that USCIS wants to make it harder for people to qualify for this waiver. I ask that you see that this proposal hurts us all, especially those who need the waiver the most.
230	USCIS-2010-0008-0356	Young Park	The United States has long been a country which has welcomed new immigrants to this great country. The United States is, after all, a country of immigrants--a unique experience for a free and democratic society in the world history. The Unites States has been and is a beacon of hope and freedom to many people around the world. If anything, the U.S. government should pursue policies that promote immigration. The fee-wavering policy for low-income people is both needed and humanitarian. I oppose any attempt to do away with this policy! The proposed change in the policy is not based on economic reasoning. Its ulterior motive is quite obvious.
270	USCIS-2010-0008-0439	Claire Gilchrist	There should not be additonal red tape to receive a fee waiver exemption. Candidates for fee waiver have already been income vetted through their applications for food stamps and or Medicaid. Creating an additional screening process requires more time and human resources, which is a waste of taxpayer money and another example of a bloated bureaucracy. Since this proposal is redundant, it sows distrust amongst taxpayers regarding the reason for this proposal.

ID	Comment.	Commentor	Comment
232	USCIS-2010-0008-0344	Kyle Wasser	<p>I am a practicing immigration attorney and I work extensively with U-Visas and VAWA cases. They are about 80% of my caseload.</p> <p>Fee waivers are important, especially in VAWA cases, where an abused spouse may be living on the streets or unable to make ends meet because they've been kicked out on the street or taken advantage of by their US citizen/LPR spouses. Often, they have dependent USC children that they must take with them that are receiving public benefits.</p> <p>I could almost understand doing away with the fee waiver for PB receipt with U Nonimmigrant cases (although it would be a great hardship to many of my clients); however, in VAWA cases, I am strongly opposed to doing away with fee waivers based on public benefit receipt.</p>

ID	Comment.	Commentor	Comment
633	USCIS-2010-0008-0879	Jon Sirkis	<p>RE: USCIS-2010-0008, OMB Control Number 1516-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>I oppose the proposed revisions to the I-912 fee waiver application and instructions as well any corresponding changes to the USCIS Policy Memorandum, PM-602-0011.1. I ask that USCIS to withdraw the proposed revisions to the fee waiver form and USCIS memoranda.</p> <p>The proposed revisions directly conflict with the clear will of Congress that survivors not be precluded from seeking status due to inability to pay fees. Moreover, the abrupt change in fee waiver policy violates the special "any credible evidence" standard Congress mandated, in express recognition that survivors of domestic and sexual violence, in particular, often do not control "primary" forms of evidence. Furthermore, the proposed revisions will cause significant additional burdens for immigrant survivors of domestic violence, sexual assault and human trafficking, as well as for the service providers that assist them.</p>

ID	Comment.	Commentor	Comment
914	USCIS-2010-0008-0922	Viana Zucchet, Tahoe SAFE Allliance	<p>Greetings from Tahoe SAFE Alliance, we are a domestic violence and sexual abuse agency, we provide free services to victims of abuse, including immigration assistance. We believe that the most important reason why a person stays in a bad relationship is because of the financial situation and of course financial abuse is predominantly the main reason. Charging fees for victims of household violence would be extremely difficult for them to come up with the money to file. Please consider leaving the fee waiver for those who actually need it such as those in the humanitarian category. Please consider not taking away the waiver for domestic violence and sexual abuse victims.</p> <p>Thank you, Viana Zucchet, DOJ accredited representative for Tahoe SAFE Alliance</p>

ID	Comment.	Commentor	Comment
3	USCIS-2010-0008-0147	Emma Dempster-Greenbaum	<p>This proposed change is irresponsible and harmful. As someone employed in the immigration field and with experience working with clients receiving public benefits, the means-tested benefits requirement has always been a logical and simple way to show financial need. The argument that different locales have different requirements for means-tested benefits is specious; this variance allows fee waivers to account for differences in cost of living across the country, without the burdensome need to prove hardship. Proving receipt of a public benefit outsources the necessity of proving need to public agencies that are already making those determinations. Requiring that fee waiver requestors prove their need again to USCIS officers is duplicative of work already done by social service agencies, and fails to account for regional variance in cost of living. The hardship determination option that exists as an alternative to below-poverty-line income is burdensome both to immigration officers and to requestors, who by and large have already provided proof of hardship to social service agencies.</p> <p>The argument that the "cost" of fee waivers has risen and caused the cost to paying applicants to rise is absurd as it is given. The "cost" has risen as the fees charged by USCIS have risen; without showing a rise in the proportion of applicants receiving fee waivers whose incomes are above the poverty line, the argument is a meaningless abuse of statistics. If USCIS is concerned about a budget shortfall, requiring additional information from requestors and requiring that officers make a decision about the validity of their hardship claims is a backwards solution, creating additional work and causing additional expenses.</p> <p>The fees charged by USCIS are excessive even for families whose incomes are slightly above the poverty line, or even above 200% of the poverty line, the point at which the full fee is required. By rejecting the determinations of social service agencies (the experts in their field and in local poverty,) that clients are experiencing financial hardship and require public assistance, USCIS will create an underclass of immigrants who have a financial bar to citizenship. This is an unconscionable abuse of discretionary power.</p>

ID	Comment.	Commentor	Comment
5	USCIS-2010-0008-0149	William Cooper	<p>As someone with an agency that works with homeless and those in poverty to establish their identity I cannot stress enough my opposition to this change. Frequently, those who are homeless or in poverty cannot afford the fee to replace their identification documents, even though they have followed the process of becoming a permanent resident or a citizen. Without the ability to have the fee waived, these individuals will not be able to obtain the documents they need to be issued state identification, and subsequently they will be unable to get a job, cash a check, get housing, get medical care, and a range of other activities will be impossible for them to access.</p> <p>While the Fee Waiver process currently purports to have 3 methods for the fee to be waived, the option to prove your limited income is currently not practical. My agency has submitted dozens of applications, with supporting documents, only to be rejected under the premise that the clients cannot definitively prove they don't earn more income than what they've reported and documented. This is a logical flaw because no one can prove something that isn't. This makes this means of obtaining a fee waiver moot and ineffectual. Therefore, there are only two remaining options for persons to obtain a fee waiver: showing they receive a means-tested benefit or demonstrating another hardship.</p> <p>I submit that demonstrating a hardship, while sometimes salient, is judged on what is demonstrated to be a very subjective basis. I've submitted applications for clients that are homeless, stating that homelessness as the hardship. Some are approved, whereas some are not, even though we supply documentation of their homelessness. There doesn't seem to be a rational basis for who is approved and who is not.</p> <p>Therefore, the only non-subjective, provable method for obtaining a fee waiver is to demonstrate that the applicant is on a means-tested benefit. It's easy to show because the state agencies have already done the hard work. It's subjective because, even though there are some variances in the standards, most state agencies use very similar if not exactly the same tests and burden of proof to obtain the benefits. Therefore, the means-tested benefit method of obtaining a fee waiver is practically the only true way to objectively determine the actual need for a fee waiver.</p> <p>Given the above, it would be unconscionable to eliminate this option. Without this means to prove financial need, those who are struggling to survive and be productive members of society. Specifically, clients such as mine, who have gone through the proper channels to become permanent residents or citizens, but who have had their documents stolen or destroyed, will be relegated to a permanent state of poverty and homelessness. A fee waiver will allow many people to rejoin the ranks of working, fully participating members of society and that that small fee will be completely eclipsed by the economic participation, taxes generated, and the savings of local communities that have to support fewer homeless and impoverished families.</p>

ID	Comment.	Commentor	Comment
6	USCIS-2010-0008-0148	Thomas Pratt	<p>As an attorney that works with homeless and those in poverty to establish their identity I cannot stress enough my opposition to this change. Frequently, those who are homeless or in poverty cannot afford the fee to replace their identification documents, even though they have followed the process of becoming a permanent resident or a citizen. Without the ability to have the fee waived, these individuals will not be able to obtain the documents they need to be issued state identification, and subsequently they will be unable to get a job, cash a check, get housing, get medical care, and a range of other activities will be impossible for them to access.</p> <p>While the Fee Waiver process currently purports to have 3 methods for the fee to be waived, the option to prove your limited income is currently not practical. I have submitted dozens of applications, with supporting documents, only to be rejected under the premise that my clients cannot definitively prove they don't earn more income than what they've reported and documented. This is a logical flaw because no one can prove something that isn't. This makes this means of obtaining a fee waiver moot and ineffectual. Therefore, there are only two remaining options for persons to obtain a fee waiver: showing they receive a means-tested benefit or demonstrating another hardship.</p> <p>I submit that demonstrating a hardship, while sometimes salient, is judged on what is demonstrated to be a very subjective basis. I've submitted applications for clients that are homeless, stating that homelessness as the hardship. Some are approved, whereas some are not, even though we supply documentation of their homelessness. There doesn't seem to be a rational basis for who is approved and who is not.</p> <p>Therefore, the only non-subjective, provable method for obtaining a fee waiver is to demonstrate that the applicant is on a means-tested benefit. It's easy to show because the state agencies have already done the hard work. It's subjective because, even though there are some variances in the standards, most state agencies use very similar if not exactly the same tests and burden of proof to obtain the benefits. Therefore, the means-tested benefit method of obtaining a fee waiver is practically the only true way to objectively determine the actual need for a fee waiver.</p> <p>Given the above, it would be unconscionable to eliminate this option. Without this means to prove financial need, those who are struggling to survive and be productive members of society. Specifically, clients such as mine, who have gone through the proper channels to become permanent residents or citizens, but who have had their documents stolen or destroyed, will be relegated to a permanent state of poverty and homelessness. While I've seen many here comment that we shouldn't grant fee waivers to anyone, and which rant about people who leech off of the system, I find these comments to be ignorant, uninformed and without true merit. They don't understand that a fee waiver will allow many people to rejoin the ranks of working, fully participating members of society and that that small fee will</p>

ID	Comment.	Commentor	Comment
10	USCIS-2010-0008-0154	Rachel Kane	I strongly object to the means tested benefits option being removed from the form I-192. Many of our elderly clients are not required to file taxes due to their low income, so we need to use the means tested benefits option in order to apply for the fee waiver. Due to their age and lack of employment, it would be impossible for them to pay for the high fee associated with applications like N-400 or I-90. This would discourage people from renewing their green cards in a timely manner or applying for citizenship. This proposed rule is ageist and classist in where it assumes that all people are required and therefore, are filing taxes. This is not the case at all and would hurt many people.
12	USCIS-2010-0008-0157	Ingrid Laterza	Removing the means-tested benefit as a basis for fee waiver will disenfranchise a large portion of the immigrant population, particularly those who make less than the threshold to file taxes, or those who are elderly and not required to do so.

ID	Comment.	Commentor	Comment
13	USCIS-2010-0008-0158	Ari Jones	<p>This is a terrible policy proposal that ignores the lived experiences of those with financial hardship.</p> <p>Means tested benefits use different metrics in different parts of the country because the United States is a vast and diverse country. The spending power of \$100 in San Francisco is very different than in Omaha or Raleigh. Social services agencies and state legislators recognize this difference and adjust their income requirements for various social services to reflect the reality of different income brackets and the cost of living in different parts of the country.</p> <p>As the current policy stands, USCIS has also taken this into account by allowing applicants to provide proof of receipt of means tested benefits as evidence of a need for a fee waiver. Eliminating this allowance is ignorant and heartless.</p> <p>Of course people of different incomes will be more or less in need of a fee waiver depending on where they live in the U.S. This is not unfair it is practical and rational. It is a better reflection of who truly needs financial assistance or a fee waiver. Unfortunately, the Federal Poverty Guidelines only provide one guide for the continental 48 United States. The idea that one income can represent a poverty line across the continental U.S. is absurd because of the diversity of cost of living. Therefore, relying on this number as one of two options to receive a fee waiver is equally absurd. This proposed policy evidences a severe ignorance of the real lived experiences of poor people in America.</p> <p>Further, this policy signifies a disdain for poor immigrants in America. USCIS must know that, because of the proposed policy, thousands of eligible individuals will be unable to apply for their rightful benefits under immigration law. An asylee who has finally been able to find a decent job and barely get by may not be able to get a fee waiver just because their income isn't low enough, according to a national designation. This policy will prevent thousands of people from adjusting status, filing appeals of decisions, getting replacement documents, and becoming citizens.</p> <p>USCIS mission is to administer[] the nation's lawful immigration system, safeguarding its integrity and promise by efficiently and fairly adjudicating requests for immigration benefits while protecting Americans, securing the homeland, and honoring our values. Excluding thousands of eligible individuals from attaining their lawful and rightful immigration benefits simply due to inability to pay does NOT align with our nations values nor does it constitute a fair adjudication of lawful immigration benefits.</p> <p>Please reconsider this proposed policy change and retain means tested benefits as valid evidentiary option for the Form I-912 fee waiver.</p>

ID	Comment.	Commentor	Comment
14	USCIS-2010-0008-0163	David Thompson	<p>I object to removing fee-waiver qualification via means-tested benefit. Cost of living across the United States is vastly different from region to region. As a result, federal poverty guidelines do not adequately represent poverty levels across all regions. States that have instituted means-tested benefits that use income guidelines that differ from federal poverty guidelines have done so as a result of this variation. Therefore, allowing state determined means-tested benefits as a qualification is helpful in ensuring applicants that are at or below the real poverty level for a given region can receive application relief.</p> <p>Thank you.</p>

ID	Comment.	Commentor	Comment
15	USCIS-2010-0008-0160	Johna Gray	<p>I AM AN IMMIGRATION LAW PRACTITIONER WORKING FOR A NONPROFIT THAT ASSISTS REFUGEES AND ASYLEES. I HIGHLY DISAGREE WITH ENACTMENT OF THIS NEW RULE. USE OF A FEDERAL MEANS TESTED BENEFIT SHOULD CONTINUE TO BE ONE OF THE GROUNDS FOR FILING A FEE WAIVER FOR A FEDERAL IMMIGRATION BENEFIT. AS AN EXAMPLE, THE COST FOR AN ASYLEE TO ADJUST STATUS IS CURRENTLY \$1225, A PROHIBITIVELY EXPENSIVE APPLICATION FEE FOR SOMEONE WHO HAS GENERALLY HAD THIS LEGAL STATUS FOR ONLY ONE YEAR AT THE TIME OF SUBMITTING THE APPLICATION. IF AN APPLICANT IN THIS POSITION IS EMPLOYED, IT IS GENERALLY IN A LOW-WAGE, ENTRY-LEVEL POSITION AND \$1225 COULD CONSTITUTE AN ENTIRE MONTH'S PAY. MANY NEW ASYLEES REGULARLY USE MEANS-TESTED BENEFITS, AS IS THEIR RIGHT. PROVIDING PROOF OF A MEANS-TESTED BENEFIT IS A MORE EASILY-DOCUMENTED BASES FOR THE FEE WAIVER, AS IT COMES FROM ANOTHER FEDERAL OR STATE AGENCY. PROVIDING PROOF FOR THE OTHER FEE WAIVER BASES, BE IT FINANCIAL HARDSHIP OR INCOME BELOW POVERTY GUIDELINES, WOULD BE A MORE SUBJECTIVE BASES FOR APPROVAL AND RESULT IN MORE DENIALS AND ADDED TIME WAITING FOR DECISIONS, APPLICATIONS AND PETITIONS BEING REJECTED AND RETURNED AND HAVING TO BE RESUBMITTED WITH FEES. IN SHORT, THIS PROPOSAL WOULD CAUSE BIGGER BACKLOGS, LONGER WAIT TIMES AND CREATE AN UNFAIR BURDEN ON THOSE ALREADY IN TENUOUS FINANCIAL POSITIONS.</p>

ID	Comment.	Commentor	Comment
17	USCIS-2010-0008-0162	Philip Collins	<p>I am opposed to this change. In particular for the I-912 application, eliminating the means-tested benefit portion of the I-912 will hit certain classes of people extremely hard. Asylees, for example, who are expected to file for their green card application after one year in the U.S., often find themselves unable to pay for the exorbitant \$1,225 I-485 adjustment application fee, but may be making just enough of a wage to bring them above the poverty guidelines. The same may be true of an I-131 application or an I-601 waiver application for similar populations. Since gaining lawful permanent resident status and the ability to travel are essential for immigrants living here who otherwise qualify for those benefits, these fees amount to a massive cut out of their income and only serve to keep them in poverty or close to it.</p> <p>It is also worth noting that analysis of a means-tested benefit is often much simpler and far less time-consuming than analyzing whether someone's household income is below the poverty guidelines threshold. Obtaining evidence of low income can often become a case of "proving the negative" for those who may have just lost their job, but whose most recent paychecks and tax return show a full income. Time and resources will therefore be wasted for both the applicants and the officers reviewing these applications. Some applications may be incorrectly rejected on that basis, causing, at the very least, frustration for the applicant and, at its worst, loss of an immigration benefit due to an untimely filing. Filing on the basis of a "financial hardship" is not a fix for this situation, either, as it still requires time and resources from the applicant and the officer to analyze, involves "proving a negative" again in many cases, and typically requires presenting evidence of a hardship above and beyond the struggle to stay out of poverty.</p> <p>Lastly, this proposed change and others like it are already harming vulnerable groups of people, as they are afraid of approaching anything that even looks like a means-tested or governmental benefit. Perhaps that is the intended effect, but honest, non-U.S. citizen members of the public who qualify for these benefits are frightened from applying for benefits that they truly need. I am aware, for example, of pregnant young mothers who are fearful of receiving even secondary benefits from the Michigan Department of Health and Human Services because they are unsure how it could affect them, their family, or any immigration case they are pursuing.</p> <p>For these reasons above, I am strongly opposed to this change. I draw my knowledge of the above from my experience as an immigration attorney and as someone who has recently worked at a refugee resettlement agency serving indigent immigrant populations.</p>

ID	Comment.	Commentor	Comment
20	USCIS-2010-0008-0166	Alexandra Buxo	As a person who has recently had personal identification stolen at a most inopportune time I feel and highly understand the struggle it is to recover personal identification especially the high cost. I cannot imagine the difficulty it would take for someone who is struggling with basic needs to endeavor in this without the support of work and/or financial means to assist in. I cannot support the doing away with a fee waiver for those who need it. I am opposed 100% to any ideas that would take away the opportunity for a person at their lowest to see light. I am against the exemption for fee waiver's for those who would qualify. I am for the means-tested benefit method on order to determine qualifications for the person as an objective method.
21	USCIS-2010-0008-0177	Marisol Tapia	<p>I am against the proposed changes to the current fee waiver policy. The changes being proposed hurt the most vulnerable groups in our country, the very poor. It seems to me that the only purpose behind these changes is to punish poor families. Why do I think this? Well, if poor families are no longer able to use means-tested benefits to prove they are low-income, then it makes it almost impossible for them to prove they are poor. Many families that don't make enough money to file taxes will have no way to prove they are poor, as a benefits letter showing they are receiving public benefits will no longer be accepted as prove, if these changes are approved.</p> <p>Please don't punish low-income families for being poor. It is our duty to help those in need access immigration services through fee waivers. We should be looking at ways to make it easier for people, not harder.</p>
22	USCIS-2010-0008-0176	Patrick Smith	I oppose this proposed form revision. If someone already qualifies for a means-tested benefit, then a benefit granting agency has already decided that this individual or household cannot afford basics like food, medicine, or rent. USCIS is proposing to make more (unnecessary) work for themselves. Unfortunately, that work may be paid for by people who cannot afford the fees.

ID	Comment.	Commentor	Comment
25	USCIS-2010-0008-0171	Carlyn Gray	<p>This is in accordance with the Paperwork Reduction Act of 1995 and the present Request for Free Waiver Exemptions.</p> <p>I am in favor of the proposed revision to reduce the evidence required for form I-912 to determine a person's household income and to no longer require proof of whether or not an individual receives a means tested benefit. I support this change because many immigrants do not have the financial means to pay the required fee nor the means to pay someone to produce evidence of that fact.. This proposed revision would streamline the procedure and be more efficient and effective use of government time.</p> <p>OMB Control # 1615-0116 United States Citizenship & Immigration Services Docket USCIS-2010 0008</p>

ID	Comment.	Commentor	Comment
28	USCIS-2010-0008-0175	Bria Yazic	<p>Regarding Docket ID USCIS-2010-0008, OMB Control Number 1615-0116:</p> <p>The Federal Poverty Guidelines for the 48 contiguous states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, and the Commonwealth of the Northern Mariana Islands state that a family of four are eligible for a partial fee waiver if their adjusted gross income is below \$50,200, and a full fee waiver if their AGI is below \$37,650. I will speak for the state of Vermont because that is the state in which I reside. In Vermont, eligibility for 3SquaresVT, Vermont's food stamp program, is set at 185% of the federal poverty guidelines. That means that a family of four is eligible for food stamps if they earn less than \$46,435 each year. Under the proposed change in fee waiver eligibility, this same family would not be eligible for a full fee waiver even if they receive food stamps, unless they earn less than \$37,650 per year.</p> <p>The difference between \$37,650 and \$46,435 is not very much when it comes to caring for four members of a household, who have ongoing transportation, nutrition, medical, education, and other needs. Federal Poverty Guidelines also don't take into account extenuating circumstances such as disability or illness when one considers how much money is required for a family to sustain itself. In addition, expenses are higher depending on where in the U.S. you are living - \$20 goes much farther in rural Indiana than it does in New York City. As a result, many people may earn more than 150% of the Federal Poverty Guidelines, but their needs and location may cause their financial flexibility to reflect that of a person or family living with much lower income. These are the sorts of factors considered by government benefits programs - they take the extra step of determining the reality of a household and whether or not benefits are necessary for people to succeed and hopefully with that extra support lift themselves out of financial hardship altogether.</p> <p>Most immigration applications require a fee. For example, the fee for applying for a green card is \$1,225 after the biometrics fee, for citizenship \$725 after biometrics. These are high fees, and for a family struggling to keep it together these fees might be the difference between being able to apply or not. Reduced fees definitely help, but still may not cut it for thousands of families each year who do not have the required hundreds of dollars to spend.</p> <p>The idea that means-tested benefit eligibility must be removed from the I-912 for the sake of inter-state equality is lacking in equity. Equality is based on the idea that everybody should be given the same parameters *all else being equal.* Because everybody in our country comes from unique situations, and because each of our states has highly varying living costs, means-tested benefits are there to ensure *equity* for all green card, citizenship, asylum, relative petition, work authorization, etc. applicants, so that the process is as fair as possible. For these reasons I do not believe that it is ethical or equitable to remove the means-tested benefit eligibility option from the I-912.</p>

ID	Comment.	Commentor	Comment
29	USCIS-2010-0008-0168	Gerald Weider	<p>To Whom It may Concern</p> <p>Everyone knows that it is costly to become a US citizen or to obtain a green card. Therefore people with limited means have a problem following the law as it stands. Many of those with limited means have officially approved "means tested" letters of their eligibility for benefits such as Medicaid or food stamps. Thus the simplest proof of eligibility for a fee waiver has been to attach a copy of an official letter approving a means-tested benefit, such as Medicaid or food stamps.</p> <p>The Trump Administration has issued a draft proposal that would disallow using benefit letters as proof of income, and, instead require copies of federal income tax transcripts that are more difficult for some applicants to access. The change would make completion of the I 912 fee waiver form more time consuming and complicated for both legal providers and applicants</p> <p>This proposed policy would therefore betray the American value of equal access for everyone for US citizenship or a green card. That is why I oppose the Trump administrations draft proposal on this matter.</p> <p>Thank You Rabbi Gerald I. Weider, congregation Beth Elohim, Brooklyn, NY</p>

ID	Comment.	Commentor	Comment
31	USCIS-2010-0008-0172	April R.	People should be able to apply for food stamps and other benefits and still be made citizens. Most immigrants pay into social security and taxes without the ability to benefit. They should also be able to feed themselves so they do not turn to crime or become sick. Most Americans have trouble covering healthcare and putting food on the table. Everyone has to jump through hoops to get food stamps or any other assistance. How are average immigrants going to pay to naturalize? They should not be penalized for being poor or being non-native. They are trying to do the right thing. If you want legal immigrants to stay legal, insure that this pathway stays open and allow food stamps to be in consideration for a waiver. Thank you.

ID	Comment.	Commentor	Comment
32	USCIS-2010-0008-0174	Alexandra Olins	<p>I object to the proposed revision to the fee waiver (form I-912) because it will make it very difficult for a certain class of people to prove their eligibility for this benefit.</p> <p>Low-income individuals are legally eligible for this benefit--the fee waiver. I do not understand the rationale for making it harder for them to apply for this benefit.</p> <p>Under the proposed revision, individuals will have to prove a negative, which is very difficult to do. Some clients will be unable to prove their low-income status because they are not required to file income taxes. Other people will be unable to prove that their income has changed since the last time they filed their taxes.</p> <p>Benefit letters are an easy and simple way for individuals to prove their family's income. I cannot understand the logic of making a revision to a verification process that is actually working very well. The only reason this would make sense is if USCIS actually wanted to reduce the number of people that could qualify for the fee waiver. Is that the goal of our government? To keep people from applying for benefits for which they are eligible? If so, why?</p> <p>The current fee waiver eligibility verification system is working very well. There is no reason at all to change it.</p>
33	USCIS-2010-0008-0187	Megan Lundquist	<p>I oppose the proposed revision because many immigrants rely on the means tested benefits requirement to be able to apply for the fee waiver. It is unconscionable that USCIS is using this tactic to punish poor families. I hope this proposal does not pass.</p>
34	USCIS-2010-0008-0185	Sumyat Thu	<p>I oppose the proposed revision because many immigrants rely on the means tested benefits requirement to be able to apply for the fee waiver. It is unconscionable that USCIS is using this tactic to punish poor families. Poverty and low-income status should never be a deterrent to citizenship. I hope this proposal does not pass.</p>

ID	Comment.	Commentor	Comment
35	USCIS-2010-0008-0186	Juliet Le	<p>Hello,</p> <p>My name is Juliet and I oppose the proposed revision because many immigrants, like my family, rely on the means tested benefits requirement to be able to apply for the fee waiver. It is unjust that USCIS is using this tactic to punish poor families. I hope this proposal does not pass as it will extremely affect many poor, low-income families of color in our community.</p> <p>Thank you for your consideration, Juliet</p>
37	USCIS-2010-0008-0188	Jon Gould	<p>Children's Alliance, a nonprofit organization in Washington state, objects to the proposed revision to the fee waiver process.</p> <p>We oppose the proposed revision because many immigrants rely on the means tested benefits requirement to be able to apply for the fee waiver.</p> <p>Many elderly people are not required to file taxes due to their low income, so they use the means tested benefits option in order to apply for the fee waiver. Due to their age and lack of employment and the fact that they dont file an income tax return, it would be impossible for them to prove they are eligible for the fee waiver.</p> <p>The proposed changes will place an undue burden on future citizens to prove their income status. If we rely on tax returns alone, a significant portion of people will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver.</p> <p>Please do not adopt this regulation.</p>

ID	Comment.	Commentor	Comment
45	USCIS-2010-0008-0191	Upama KC	<p>I object to this rule change because the reasons given are not truly accurate. According to USCIS "the proposed revision would reduce the evidence required for Form I-912" but in reality the opposite would be true.</p> <p>Majority of low-income clients who are getting means tested benefits would have benefit letters readily available. If USCIS only accepts income tax returns as evidence for the fee waiver, a lot of clients who do not have to file income tax return because their income is under the threshold will have to file income tax return.</p> <p>For those clients, this proposed revision will increase the evidence required for Form I-912 because they will have to file income tax return even when they are not required to file it.</p> <p>Can you please explain how this would not increase the evidence required for Form I-912?</p>

ID	Comment.	Commentor	Comment
47	USCIS-2010-0008-0193	Katherine Fennelly	<p>OMB Control Number 1615-0116</p> <p>The Department of Homeland Security is proposing to disallow proof of receipt of state-level means-tested benefits as supporting evidence of eligibility for I-912 fee waivers. The rationale offered by the agency is that definitions of poverty vary by state. How could it be otherwise when costs of living vary dramatically across the US.? According to data from the independent Council for Community and Economic Research, at the extremes, the cost of living index for Manhattan (238.3) is almost three times higher than that of Sherman-Denison, Texas (83.2).</p> <p>Not surprisingly poverty-level income criteria for the award of means-tested benefits differ between Texas and New York as well. In Texas, household income at or below \$33,588 for a family of four is considered to be low income, while in New York the cut-off is about half that amount: \$68,720.</p> <p>Furthermore, issuance of the proposed requirement of proof of income other than receipt of means-tested benefits under the Paperwork Reduction Act of 1995 strains credulity since, in fact, the proposal greatly increases paperwork, both for applicants, and for those in USCIS who will review applications for fee waivers. Instead of the submission and review of a document proving receipt of Medicaid or SNAP, the proposed regulation would require individuals to submit income tax forms and documentation of total monthly expenses, including rent, food, utilities, childcare/eldercare, insurance, loans, credit card payments, car payments, medical expenses, school expenses, and other expenses. The difference in required paperwork under the proposed regulation is dramatic.</p> <p>These stringent requirements for documentation will have the effect of making it more difficult for lower income immigrants to receive fee waivers for applications to register a green card-- currently \$1,225.00, or to apply for naturalization--\$725. When applications are submitted for more than one family member, fees can quickly run into thousands of dollars. Furthermore, they are on top of unrelated payments for the translation of supporting documents and legal advice.</p> <p>The proposal to revise criteria for I-912 should be withdrawn.</p>

ID	Comment.	Commentor	Comment
49	USCIS-2010-0008-0195	Jeremy Schwartz	<p>The high fees of obtaining a green card or to become a U.S. citizen pose an unnecessary barrier to immigrants. Documentation showing that the immigrant receives a "means-tested" benefit such as Medicaid or food stamps is a simple and appropriate way to show eligibility for a fee waiver.</p> <p>The draft proposal to disallow use of this documentation is unnecessary and inappropriate. The proposal requires instead use of federal income tax transcripts, which are cumbersome and difficult to access. It would make completion of the fee-waiver application unnecessarily burdensome, time-consuming, and complicated.</p> <p>I urge the Department to maintain existing policies allowing for documentation of means-tested benefits as adequate for fee waivers. I strongly oppose the draft proposal.</p>

ID	Comment.	Commentor	Comment
51	USCIS-2010-0008-0199	Katherine Cortes	<p>Changing the rules to eliminate the receipt of means-tested benefits as evidence to support a USCIS fee waiver will have a devastating effect on the ability of immigrants to live and work in this country, and I urge you to not to do it. The current rules and policies already make it difficult for people who come to the United States like my mother, or my fathers ancestor Roger Williams, who came from England in 1631 to legally work and otherwise contribute their strengths to the wealth and success of our great nation. The path to citizenship is the key means by which Americas newest residents can fully engage civically and economically to the strength of the United States of today and of the future, and we should be seeking to make that path clear and achievable. This rule change would do the opposite it would make it difficult or impossible for immigrants who are not required to file taxes to prove their need for a waiver timely. Without the ability to get a waiver, many if not most will not be able to afford the fees. Without citizenship or work authorizations, it will be much harder for them to achieve the economic success to reduce their use of federal, state or local benefits a vicious cycle that we must avoid.</p> <hr/>
54	USCIS-2010-0008-0210	Alessandra Pollock	<p>I am writing to urge you NOT to change the option for using a letter of receiving public benefits for income verification to receive a waiver of fees. If the agency makes this change, people with the lowest incomes will not be able to prove they need a waiver of the fee. This is wrong and I am against this change and do not want to punish families.</p> <p>Our country is better with a diverse workforce and population. We need immigrants and we need to support those individuals and families interested in living and working in our country. We are the richer for their contributions and friendship.</p>

ID	Comment.	Commentor	Comment
55	USCIS-2010-0008-0206	Marisol Tapia	The proposed changes will remove the only option that many low-income individuals have to prove they are poor, and that is means-tested benefits. These types of benefits are, in many times, the only option people have to demonstrate they are poor, as many don't earn enough money to file taxes, which will leave them without any options if means-tested benefits are deemed no longer eligible as prove.
70	USCIS-2010-0008-0222	Robin McWaters	<p>My name is Robin McWaters. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS. I am a volunteer for Refugee Womens Alliance (ReWA) and for the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at WNA Citizenship Day events once so far in 2018, and look forward to volunteering for them in the future. I help at these workshops because it so affirming to help someone on the path to citizenship. In my volunteer work at ReWa, I am spend one day a week teaching English to recently arrived refugees. The students I have worked with over the last two years are so extraordinarily motivated to learn English so they can get jobs, provide for themselves and their families, contribute to the community and participate in life in their new home.</p> <p>Many people cannot afford a lawyer. Lawyers from the American Immigration Lawyers Association volunteer their time to help prepare applications for naturalization. Over the years, many of the clients we serve have been eligible for fee waivers based on receipt of public benefits. I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive. I oppose the rule because it is counter-productive and biased. People who receive public benefits and later file for naturalization and become US citizens are more likely to obtain higher earning jobs, complete education, have access to more resources, pay higher taxes, and contribute to their communities. We should not penalize permanent residents who have received public benefits that they are entitled to receive. This proposed rule would continue the cycle of poverty.</p> <p>Furthermore, the proposed rule is redundant. The test for the fee waiver is ability to pay. A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay. States and localities have already done a needs-based test. USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed.</p>

ID	Comment.	Commentor	Comment
78	USCIS-2010-0008-0217	Pamela Henager	<p>I am especially familiar with families who need to the fee waiver to afford citizenship papers for their children. These people are often the working poor with very little income.</p> <p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p>
85	USCIS-2010-0008-0242	Lidet Gezahegne	<p>This change unfairly impacts immigrants and refugee populations. This is a disadvantage to low income families, elderly, and disabled people. We shouldnt make it more difficult for people to prove they are vulnerable and need help. This change is redundant, people who qualify for federal benefits have already proven that they have financial need.</p>
89	USCIS-2010-0008-0246	Jon Brooks	<p>Hello. I work with many people affected by this proposal. I do not think it is a good idea and would oppose these changes. This really affects low income clients who are not required to file income tax. Now they will have an additional burden of proving why they did not have to file taxes. Also, there is already a way in place to prove low income by looking at a person's need for state food and other benefits. Just stick with the system currently in place.</p>
97	USCIS-2010-0008-0240	Ashley Fisher	<p>This is unfair for the elderly, low income clients, and the disabled. People in these groups are not required to file taxes, so they will have an even heavier burden of trying to prove they didnt need to file tax returns. Also, the test is redundant. People who qualify for means tested benefits already proved that they are in financial need.</p>

ID	Comment.	Commentor	Comment
110	USCIS-2010-0008-0252	CJ Kennedy	Eligible clients who received a means-tested public benefit as already been vetted at the state level, why should they be vetted again at the Federal level. It is a bad policy as it is a waste of resources and federal funding
119	USCIS-2010-0008-0257	Alissa Baier	<p>I am an immigration attorney in Seattle, WA, who works with low-income and homeless clients. I object to the proposed revision of the fee waiver guidelines because such revisions would effectively bar most of my clientele from qualifying for much-needed fee waivers. For example, if tax returns alone are required to verify an applicant's income, my clients with no or low wages will be unable to prove their income status because they are not required to file federal income taxes. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver.</p> <p>Furthermore, the easiest and most common method of proving eligibility for a fee waiver has always been showing the applicant's receipt of means-tested benefits. Removing this from the list of eligibility requirements wrongfully sends a message to immigrants that they should no longer accept these state benefits, which effectively leaves them and their families further into poverty.</p> <p>Also, by continuing to accept proof of public benefits to prove eligibility for USCIS fee waivers, it puts the onus on state agencies for determining an applicants' income level. By discontinuing this manner of eligibility, USCIS officers will be required to do more work in making that determination on their own based on limited evidence, and this will result in the rejection of many applicants who have otherwise been eligible. Changing the rules has no overall benefit.</p>

ID	Comment.	Commentor	Comment
129	USCIS-2010-0008-0253	Adelina Solis	<p>Part of my job involves helping people apply for citizenship. Our target demographic is people who are unable to pay for or otherwise unable to access legal counsel in this process. In addition to the thousands of dollars that that counsel can cost, submitting the naturalization application itself costs \$725. For many people, that is enough to be prohibitive.</p> <p>Demonstrating means-tested eligibility is great - all you need is a copy of the letter from the benefits agency saying that you receive those benefits. Because you have already proven your finances to that agency in order to get those benefits, you're good to go. Tax-based eligibility puts an especially high burden on the poor and elderly. Many people do not make enough money to have to file taxes. This means they would have to navigate an unfamiliar and unfriendly system to obtain the necessary financial documentation. Having this eligibility based on the federal poverty line also means that there would be no consideration for the way costs of living vary across the country.</p> <p>This change would drastically reduce the number of people we can help at our events. Many people would no longer be able to demonstrate eligibility, and/or would become ineligible. All of our events are staffed by volunteers. We have to train those volunteers. Teaching someone to ask for a benefits letter is a lot easier than teaching them all the regulations around taxes, household size, and poverty measurements. We tell clients in advance what sort of paperwork they need to bring to one of our events. Still, if a client comes to one of our events and doesn't have their benefits letter with them, we can still complete the waiver application and let them know they'll just need to include a copy of the letter when they send it in. If a client comes to an event without the tax information of everyone living under their roof (not just their tax-reported dependents), we can not complete the form on their behalf. Then they'll have to decide what to do, which might mean waiting until the next event where they can get help or maybe abandoning the intention to apply.</p> <p>People should not be disenfranchised because they can't afford to pay \$725. I urge you to NOT implement this change to the Fee Waiver eligibility requirements.</p>

ID	Comment.	Commentor	Comment
131	USCIS-2010-0008-0266	Alexander Bergstrom	<ul style="list-style-type: none">-Proposed change would impact vulnerable populations like children, the elderly, and people with disabilities.-Proposed change would be a large and difficult burden on low-income immigrants who are not required to file income tax returns.-Proposed change would save zero taxpayer money since the money for fee waivers is redistributed from the fees paid by higher-income immigrants (this is a good system).-There are big factual discrepancies between the text of the proposed change and the accompanying press release (only if you want to get into the details)-The current system works fine and receipt of means-tested benefits is a completely reasonable proxy for inability to pay the application fees to immigration

ID	Comment.	Commentor	Comment
142	USCIS-2010-0008-0286	Julie Arenivar	<p>My name is Julie . I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008.</p> <p>I am a volunteer for OneAmerica, a 501(c)(3) organization that helps people apply for U.S. citizenship with free assistance from volunteer attorneys. Over the years, many of the clients we serve have been eligible for fee waivers based on receipt of public benefits.</p> <p>Over the years we have made huge strides in our immigrant communities by helping those most further away from the ability to apply for citizenship to actually do so. I will continue to fight for immigrant communities until all of these unlawful regulations like this one no longer exists. In the next few paragraphs I will explain the reasons why I oppose the proposed rule.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people. I oppose the rule for these reasons:</p> <p>A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay.States and localities have already done a needs based test. USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed. This is an example of systemically oppressive system designed to not allow people to become immigrants.</p> <p>If tax returns alone are required for income verification, people with the lowest incomes will be unable to prove their income status because they are not required to file federal income taxes, which leaves them with no way to prove their income and qualify for the fee waiver. I am against the proposed changes for this reason.</p> <p>I do not understand why these regulations exist to oppress immigrant communities. The burden of \$725.00 is a lot of money for families. We used to be a country that welcomed immigrants to this country and now we are a country that is ruled by hate and fear.</p>

ID	Comment.	Commentor	Comment
143	USCIS-2010-0008-0279	Vicki Mayster	<p>The proposed rule to amke ti much more difficult for immigrants applying for citizenship to get fee waivers is a misguided attempt to save money and keep hard-working immigrants out of citizenship and becoming active in U.S. democracy. Using health benefits (Medicaid) or food stamps is NOT a predictor of who will be a good U.S. citizen -- it just ensures that low-wage workers and families will not be able to become U.S. citizens.</p> <p>The costs of these USCIS filing fees are so very high -- and I'm sad to see that the Trump administration chooses to make it harder, not easier, for the types of people who built this country to become citizens.</p> <p>Many of your and my ancestors (great-grandparents and others) would not have been able to afford these fees without help - and we might not even be US citizens if this proposed rule had been in effect back then. Pay it forward! Do right my immigrants and they will do right for this country.</p> <p>Reject this proposed rule on fee waivers!</p>

ID	Comment.	Commentor	Comment
145	USCIS-2010-0008-0300	Allison Lubert	Some filing fees, especially the fees to adjust status and naturalize, are very high. For some people, these filing fees can be prohibitive. Immigrants legally receiving means-tested benefits from their state welfare agencies are able to show proof of they are receiving a means-tested benefit and get a USCIS fee waiver. The proposed Fee Waiver rule would limit who qualifies for a free waiver. The proposed rule will no longer accept proof of a means-tested benefit to show inability to pay the filing fees. Immigrants could be barred for ever becoming naturalized citizens because of the inability to pay filing fees. This forces people to live in limbo between status. USCIS should continue to rely on proof of a means tested benefit when deciding if a person qualifies for a fee waiver. Applicants have already been vetted by state agencies with expertise in assessing the income and needs of families.
160	USCIS-2010-0008-0298	Jane Lubert	The proposed Fee Waiver rule would limit who qualifies for a free waiver. Many immigrants are legally receiving means tested benefits. Applicants have been able to show proof of a means tested benefit to receive a fee waiver. USCIS should continue to rely on proof of a means tested benefit when deciding if a person qualifies for a fee waiver. Applicants have already been vetted by state agencies with expertise in assessing the income and needs of families. There is no need for USCIS to waste resources re-vetting applicants' ability to pay when a state agency has already done so.

ID	Comment.	Commentor	Comment
165	USCIS-2010-0008-0314	Sydney Maltese	<p>I am a resident of Washington state and I oppose the proposed changes to the fee waiver rules. As a legal advocate who regularly files Form I-912, I find this rule change unnecessarily burdensome for applicants and practitioners. The easiest, fastest, and most widely-accepted document to prove diminished income is the receipt of means-tested benefit. All states have income requirements for the receipt of means-tested benefits, and the federal government should acknowledge and respect these requirements as established by the individual states. If this federal government truly values the autonomy of the states, as the administration claims to, then they will respect the individual systems states have established for the qualifications for their individual means-tested benefits programs, and they will understand that these qualifications are tailored to the economy and average income of the individual state. It makes no sense to make one standard income requirement that spans this whole country when economic conditions from state to state vary so widely - from urban to rural, from economies buzzing with development to those rebuilding after recession or natural disaster. Proof of means-tested benefits is perhaps the most sensible supplement for the Form I-912, and I therefore ask the federal government refrain from changing this rule.</p>

ID	Comment.	Commentor	Comment
170	USCIS-2010-0008-0315	Christina Guros	<p>I strongly oppose the proposed fee waiver rule change because it is an irresponsible use of public funds.</p> <p>With the change to the fee waiver form and process that eliminates the receipt of public benefits as valid evidence of a persons economic need, U.S. Citizenship and Immigration Services (USCIS) is proposing to redo the work of local and state agencies that make determinations about someones income eligibility for public assistance. USCIS believes that their immigration officers should be using their time to make an income determination for individuals who have already received an income determination from their local benefits-granting agency. This is a terrible waste of tax payer money in several ways.</p> <p>It would have our tax dollars pay for the same service at two separate levels of government. States and counties have an infrastructure for determining whether someone is eligible for public assistance due to economic hardship. Immigrants and refugees who legally access benefits through this infrastructure must provide documentation to prove their eligibility for these benefits. USCIS is now proposing that the state determination of economic need is no longer sufficient and that their officers should spend the time they would be adjudicating immigration applications to determine whether someone has economic need.</p> <p>Benefits-granting agencies and their employees are experts in evaluating a familys economic need and low-income status. Immigration officers are not. Officers at the USCIS Lockbox facilities must also review pay stubs and other proof of income from the dozens of states from which they process applications, whereas local authorities are trained on and familiar with the local standard for pay receipts. More and more families are relying on the gig economy for income, but employers like Uber and Amazon Flex do not provide biweekly pay stubs like a traditional employer. USCIS officers will need to be better trained on the variety of income verification documents used throughout the country. This increased training time adds up with increased time spent reviewing each application to mean a greater and unnecessary expenditure of public resources.</p> <p>This proposed fee waiver rule change will be a waste of public resources and for this reason I strongly oppose its implementation.</p>

ID	Comment.	Commentor	Comment
195	USCIS-2010-0008-0338	Francesca Wool	<p>I am writing to express my opposition to the proposed change to eliminate receipt of means-tested benefits as a valid form of evidence in support of a request for a fee waiver. Not only is this proposed cruel, it will also prevent thousands of low-income individuals from accessing their rightful immigration benefits and significantly increase the paperwork needed to submit an I-912. This proposal also ignores the fact that means-tested benefits use different metrics in each state because our country is diverse and the cost of living varies regionally. It is irrational to propose that the federal poverty guidelines apply uniformly across all states. Hence, this proposed change clearly comes from a place of animus towards low-income individuals rather than an understanding of logic and economics. The Trump administration should withdraw this proposed change immediately.</p>

ID	Comment.	Commentor	Comment
202	USCIS-2010-0008-0408	John Greenhill	<p>Good evening,</p> <p>It is my understanding that currently, my government will waive some immigration application fees if the applicant receives a means-tested benefit like Medi-Cal or food stamps. This seems like a reasonable and fair way to allow those with less means to be able to progress through our government-created processes.</p> <p>Since my government has created the means-test, it should respect and honor that test. Given that my government has determined these people have little means, then it's appropriate to waive the substantial fees which would impose obvious hardship.</p> <p>Clearly, imposition of the fees is an indirect way to block these people from progressing through the process that we have set up, and that's both dishonest and cruel.</p> <p>I ask that NO REVISION be made the the current rules. Don't waste my taxpayer time and money messing around; just do the job as it has been defined and get these people through the process with speed and efficiency and human decency.</p> <p>Thank you, -John G</p>

ID	Comment.	Commentor	Comment
227	USCIS-2010-0008-0387	Christina Guros	<p>I strongly oppose the rule change to the fee waiver process proposed by the Department of Homeland Security because it is a waste of public resources at a time in which U.S. Citizenship and Immigration Services (USCIS) greatly needs increased efficiency.</p> <p>The evidence required for an income-based fee waiver is more burdensome for USCIS officer review than is the evidence for a benefits-based fee waiver; whereas a benefits letter that includes the applicants name and information about their income and benefits receipts is sufficient evidence currently for a fee waiver based on benefits, a fee waiver based on income requires the previous years tax return and pay stubs from the past three months. This is inherently more evidence to go through than a public benefits letter which is one document. This review of income for those who receive public assistance is a waste of USCIS officer time.</p> <p>Moreover, the evidence proposed by this rule change is more difficult for very low-income families to obtain. Some will be unable to obtain proof of income that they do not have. These fee waiver applications will likely be denied, and USCIS will send these applications back. But very low-income families still will not have the money to pay the application filing fees, so will look for more evidence and resend the fee waiver request. This may happen two, three, four or more times, and each time a USCIS officer will need to review the request. Whereas a simple benefits letter would have sufficed the first time, the changes from this proposal would mean an extreme waste of officer time re-reviewing the same case.</p> <p>More officer time spent adjudicating fee waivers means less time adjudicating the unprecedented and extreme backlog of applications currently in waiting at USCIS. There are currently 729,400 naturalization applications backlogged at USCIS and some applications are taking 20 months to process (http://partnershipfornewamericans.org/portfolio/npna-report-building-a-second-wall-uscis-backlogs-preventing-immigrants-from-becoming-citizens/). USCIS goal for processing naturalization cases is three to four months, so this backlog represents a wait five times as long as the norm for someone applying for U.S. citizenship. This wait time is discouraging to potential applicants who may have to travel or will have other life changes in the next year and a half of their lives. Potential applicants who have learned of the backlogs are discouraged from applying for benefits, especially for US citizenship.</p> <p>There are currently increased backlogs on most USCIS case types. USCIS should be focusing all efforts on eliminating backlogs so that more people are encouraged to apply. This would increase agency revenue overall as the vast majority of applications are still submitted with fees. Instead of erroneously placing the blame on immigrants who need fee waivers and proposing to waste more officer time on adjudicating fee waivers, USCIS should focus all staff time on processing the backlog of cases.</p>

ID	Comment.	Commentor	Comment
296	USCIS-2010-0008-0418	Tim Reiersen	Please reconsider and do not change the rules to penalize those who accept government assistance programs. Many immigrants are coming from very difficult situations and need some help at the beginning. The vast majority will be on their feet quite quickly and will more than pay back any temporary assistance that was needed. Most people do not want hand-outs. At its core this is a purely racist proposal which assumes that immigrants are lazy freeloaders, or worse, to quote the commander in chief "rapists". Please take a higher road and help lift our country up, by refusing to accept the racist basis for the proposed rule change, and refuse to support these changes. Thank you for considering these comments.
301	USCIS-2010-0008-0414	Lisa Christoffersen	It does not make any sense to eliminate the receipt of public benefits as a source for a fee waiver for immigration processing. A national income test doesnt account for huge differences in the cost of living from one area to another. Area median income in Seattle is almost twice the median income in many other parts of the country. State benefit agencies should continue to establish "financial hardship" in their areas. They already do this. It is fair and reduces USCIS workloads. Sincerely, Lisa Christoffersen
327	USCIS-2010-0008-0452	Matt Crawford	I do not support the proposed rule change for the Elimination of Receipt of Means-Tested Benefits as Basis for Immigration Application Fee Waivers. Immigration fees are high, many people cannot afford them, and the means-tested benefit method is a proven way to allow those people to apply.

ID	Comment.	Commentor	Comment
345	USCIS-2010-0008-0513	Damon Kemp	<p>My name is Damon Kemp. I Urge the Trump Administration to immediately withdraw this proposed revision to revise the Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I volunteer with the Washington New Americans (WNA) program of OneAmerica, a 501(c)(3) organization. I have volunteered at citizenship clinics 2 times and will be volunteering more. I help at these workshops because, as a former soldier, I saw firsthand the valuable contributions that immigrants make to our country through their military service. Not everyone can afford a lawyer, and so attorneys from the American Immigration Lawyers Association volunteer their time to help prepare citizenship applications. We have been able to help thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of means-tested benefits.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 prohibitively expensive for many people. I oppose the rule for these reasons:</p> <p>If our taxes are already paying state or local benefits-granting agencies to thoroughly verify household income for those applying for benefits, why does USCIS want to redo this work? USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed, especially when N-400 processing times are at a historic high.</p> <p>Naturalizing makes people less likely to need public benefits, but prohibiting applicants to use proof of public benefits to qualify for the fee waiver will make them less likely to be able to naturalize. Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages, than their non-naturalized foreign-born peers. Naturalization, on average, accounts for an 8-11% increase in wages, which results in higher spending and state and local taxes paid. This rule instead continues the cycle of poverty if residents cannot afford to become US citizens if they cannot afford to apply.</p> <p>It would seem that we are trying to place another cumbersome burden, on those who receive public benefits, from acquiring citizenship. What about our young immigrant military members who decided to join the military to provide for their family who must use public benefits? Will they not be able to use this fee waiver? We are asking them to sacrifice their all for our country and I feel that this waiver should not be taken away from them.</p>

ID	Comment.	Commentor	Comment
346	USCIS-2010-0008-0499	Christina Guros	<p>I oppose this rule change because it will have a detrimental effect on the legal services infrastructure of Washington State.</p> <p>I work in Washington State which has 45 Department of Justice (DOJ) recognized agencies and offices according to the most recent roster published by the DOJ Office of Legal Assistance Programs (https://www.justice.gov/eoir/page/file/942306/download#WASHINGTON). Among these agencies the roster shows 100 individuals accredited by DOJ OLAP to handle immigration cases through these recognized nonprofit agencies in Washington.</p> <p>The DOJ Recognition and Accreditation (R&A) Program aims to increase the availability of competent immigration legal representation for low-income and indigent persons, thereby promoting the effective and efficient administration of justice (https://www.justice.gov/eoir/recognition-and-accreditation-program). The changes proposed by the Department of Homeland Security US Citizenship and Immigration Services (USCIS) would hurt the ability of recognized agencies to support immigrants in Washington State. In fact, it would gut the entire R&A infrastructure of Washington State.</p> <p>Most DOJ recognized agencies in Washington rely on contracts from the state or municipalities that require they assist individuals who access public benefits or are otherwise low-income. For example, the Washington State Department of Social and Health Services Office of Refugee and Immigrant Assistance (DSHS ORIA) has funded a program for decades, focused on naturalizing vulnerable populations who access assistance. This includes refugees, the elderly, and those who struggle with literacy or with disabilities. This program infrastructure surrounds DOJ recognized agencies that do not charge for services. These agencies and the larger legal services infrastructure will suffer if this proposed fee waiver rule change were to be implemented.</p> <p>Washington State agencies that assist immigrants and refugees who receive public benefits can currently prove fee waiver eligibility by submitting a letter from DSHS that shows the applicant or an eligible family member receives public assistance. With the proposed rule change, this would no longer be possible. Agencies would instead need to assist these highly vulnerable populations in finding proof of income that is often nonexistent. Instead of assisting these individuals with their application for citizenship, DOJ accredited representatives in Washington would need to spend copious amounts of time assisting families in obtaining forms from the IRS that may not be sufficient to prove fee waiver eligibility.</p> <p>These legal professionals have become accredited by the DOJ because they have shown ample training and experience in immigration law. These highly skilled individuals would now spend a disproportionate amount of time looking for evidence of financial need, a task for which they are not paid under almost any contract or grant structure. Agencies like ORIA would need to deprioritize actual naturalizations in their funding structure and give more emphasis to reimbursing for time</p>

ID	Comment.	Commentor	Comment
347	USCIS-2010-0008-0514	Margo Dawes	<p>My name is Margo Dawes, and I am writing this comment to strongly urge the Trump Administration to withdraw this proposed revision to Form I-912, Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. I am a US citizen, but some of my grandparents and great-grandparents were immigrants to this country and my family still has relationships with our relatives in Ecuador. For this reason and many others, I have always believed in the fundamentally American story of immigrating to this country, working hard, and becoming a proud citizen. I have volunteered with organizations committed to helping legal permanent residents become citizens and participate in our democracy, including Entre Hermanos and the Washington New Americans program of OneAmerica in Seattle, WA, and the Revere Immigrant Solidarity Network in Revere, MA. I've helped with voter registration efforts for recently naturalized citizens and with citizenship classes and clinics. Through this work, I have seen that not everyone can afford a lawyer (a necessary resource in this very comprehensive process!), so attorneys from the American Immigration Lawyers Association regularly volunteer their personal time to help lower-income individuals prepare applications for citizenship. The AILA has helped thousands of people successfully naturalize thanks to their eligibility for the I-912 fee waivers based on receipt of other means-tested benefits.</p> <p>I oppose the proposed rule change that would eliminate the use of public benefits to qualify for the fee waiver because it would make the process unnecessarily and prohibitively arduous for low-income, hard-working legal permanent residents, and the current N-400 filing fee of \$725 is too expensive for many people to afford. Our taxes already pay state and local benefits-granting agencies to thoroughly verify household income for those applying for benefits, so requiring anyone to redo this work would constitute a waste of public dollars. USCIS does not need to add to the cost and bureaucracy to require more evidence of income or reasons a tax return was not filed, especially when N-400 processing times are at a historic high. Further, naturalizing makes people less likely to need public benefits! Naturalized citizens are more likely to access higher education, become homeowners and business owners, and earn higher wages than their non-naturalized foreign-born peers. But prohibiting applicants from using proof of public benefits to qualify for the fee waiver will make people less likely to be able to naturalize, thereby continuing and entrenching the cycle of poverty and dependence on public benefits to survive.</p> <p>Make the path to citizenship easier, not harder, for hard-working immigrants like the people who made my education, independence, and prosperity possible.</p>

ID	Comment.	Commentor	Comment
351	USCIS-2010-0008-0485	Stephanie Neely	I request that USCIS not enact the currently proposed rule. This proposal would prevent low-income applications receiving food stamps, public housing, or Medicaid from using this as a basis for a fee waiver, and instead would require tax returns and pay stubs. This places a substantial burden on low-income applicants and would prevent thousands of eligible applications from becoming US citizens. It also would increase the burden on USCIS for adjudicating fee waivers, as it would increase the amount of paperwork USCIS would be required to process and analyze. USCIS has not articulated a sufficient increased benefit to counteract this increased burden.
364	USCIS-2010-0008-0497	Rebecca Meloy	<p>I oppose the Department of Homeland Security U.S. Citizenship and Immigration Services' proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Please enter my opposition into the written record.</p> <p>Rebecca Meloy Bellingham WA</p>
423	USCIS-2010-0008-0564	Beth Charpentier	I strongly oppose this change. Our country is great because of the people who are invited to join it. The change is asking for documentation you know people will not have. It is an unfair way to reduce the applications. The state already provides means-tested benefits. There is no reason to change the requirement. It will result in additional bureaucracy and administrative waste and is unnecessary. I strongly oppose this regulation. It is not what America is about.
426	USCIS-2010-0008-0559	Tagoipah Mathno	This new policy is a barrier to those who are in a difficult financial situation. Those who rely on public benefits usually are not in a position to have excess funds or have a job with a high enough salary to pay for these fees.

ID	Comment.	Commentor	Comment
469	USCIS-2010-0008-0651	Borka Paponjak	<p>I strongly oppose the proposed change. My family came to the US as immigrants, and we worked extremely hard to start a new life here from scratch, raising a family, and trying to blend into a new society. The agency that we came through signed us up for public benefits because it was the only way to survive before finding the jobs. I arrived in April of 1996 and got my first job in June of 1996 and to punish me from becoming the U.S. because I was getting public benefits to survive those couple of months without job, would be outrageous and totally inhumane. Please do not go ahead with the change.</p> <p>Thank you,</p>

ID	Comment.	Commentor	Comment
732	USCIS-2010-0008-0932	Andrea Guttin	<p>1 of 6</p> <p>November 27, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 – Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9/27/18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>I am an immigration attorney and have been admitted to practice for nine years, six of which have focused on immigration law and, more specifically, asylum law. I have represented primarily asylum seekers and children, including those who have sought Special Immigrant Juvenile Status. Virtually all of the immigrants I have represented before USCIS would generally be considered lowincome, with incomes below 187.5%, 150%, or 125% of the Federal Poverty Guidelines, depending on the requirements of the grant that I was working under at the time.</p> <p>I oppose the proposed revision to Form I-912 and requests that USCIS withdraw this proposed revision. Eliminating access to fee waivers through demonstrated receipt of a means-tested benefit will prevent many qualified, low-income immigrants from submitting applications for benefits they otherwise qualify for. Allowing fee waivers based on the receipt of a means-tested benefit, along with the other two methods of qualifying permitted by the I-912 in its current form, allows USCIS to</p>

ID	Comment.	Commentor	Comment
733	USCIS-2010-0008-0738	Sarah Peterson, The Washington State Department of Social and Health Services (DSHS)	<p>Dear Samantha Deshommes,</p> <p>The Washington State Department of Social and Health Services (DSHS) writes in response to the Department of Homeland Security's (DHS) proposed revisions to Form I-912 Request for Fee Waiver. DHS is proposing to revise this form to not accept receipt of a means-tested benefit as evidence of eligibility for the Fee Waiver. Instructions dating back to March 13, 2011, provided that Fee Waiver requests are considered when the individual is receiving a means-tested benefit (public assistance program such as cash, food, or medical assistance), a household income level below 150 percent of the Federal Poverty Level (FPL), or financial hardship. The proposed revision is a significant change that increases the reporting burden on individuals, needlessly exacerbates the administrative burden on states, and negatively impacts thousands of low-income individuals and families in Washington State. We strongly oppose the proposed change and urge that it be withdrawn. DSHS serves more than two million people each year by helping to provide a pathway out of poverty. DSHS's Economic Services Administration issues means-tested public benefits programs, including cash and food assistance, to low-income individuals and families across Washington. Within ESA, the DSHS Office of Refugee and Immigrant Assistance (ORIA) administers a state-funded Naturalization Services Program to help low-income individuals to become U.S. citizens. Since 1995, ORIA has contracted with community-based organizations across the state to provide naturalization assistance to people who are receiving DSHS public benefits. Providers are required to submit a Request for Fee Waiver as part of the application process to USCIS, and they specifically utilize letters from DSHS to determine if someone is eligible for their service and for a Fee Waiver.</p> <p>In 2017, ORIA contracted with thirteen community-based providers in Washington that assisted 1,645 applicants in completing the Form I-912 Request for Fee Waiver. The revision proposed by DHS would make the application process more complicated for these providers and for many low-income people completing the form independently. Clients eligible to receive ORIA's services are often the working poor, making less than the minimum income required to file a federal tax return. In these cases, individuals and families would have difficulty providing proof of income suitable for satisfying the proposed requirements for obtaining a Fee Waiver, and if denied, would likely not complete the naturalization process altogether despite being eligible. The impact would be particularly harsh on the elderly and the disabled, who are not required to file tax returns and would face an even higher barrier to proving their eligibility.</p> <p>It is clear the proposed revision would needlessly increase reporting requirements and administrative burden on states and the clients we serve. According to our state's contracted providers, the current Fee Waiver application takes approximately 30 minutes to complete by submitting evidence of receipt of public benefits. Yet under the new proposed guidelines, we estimate it will take contractor staff at least two (2) hours to successfully complete the revised Form I-912. This is because it would require contractors and service providers to collect and assess a wide variety of documentation — for instance, different pay stub templates with different income information from multiple employers — while creating significant confusion among applicants about which tax forms meet the new evidentiary standard, thus creating more strain on the time and resources of contractors and providers. We anticipate these changes would result in an increase of nearly 2,500 service hours for providers, increasing both community-based organizations and DHS's. This administrative burden is currently not incorporated into the costs of administering the</p>
742	USCIS-2010-0008-0765	Gus Moulton	<p>Immigrants with the lowest incomes should continue to have the option of relying on the current accepted methods to verify their income so they can apply for the fee waiver. USCIS should not penalize families with the lowest incomes by changing verification methods and making it more difficult to receive a fee waiver for their citizenship application. I am strongly opposed to the new policy.</p>

ID	Comment.	Commentor	Comment
748	USCIS-2010-0008-0828	Amy Barasch	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. Almost none of our clients can afford fees like this - many people working full time could not afford them. The government should not be making money off of people struggling to get by and eager to be a part of this country.

ID	Comment.	Commentor	Comment
758	USCIS-2010-0008-1085	An Le, City of Boston, Mayor's Office for Immigrant Advancement	<p>November 27, 2018</p> <p>Samantha L. Deshommes Chief, Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 Re: OMB Control Number 1615-0116 United States Citizenship and Immigration Services, Docket ID USCIS-2010-0008 Public Comment Opposing Proposed Changes to Form I-912, Request for Fee Waiver</p> <p>Dear Ms. Deshommes:</p> <p>The City of Boston ("City") appreciates the opportunity to comment on the proposed change to Form I-912, Request for Fee Waiver ("proposed change"), by the United States Citizenship and Immigration Services ("USCIS"). As it is a matter of USCIS policy that "individuals may apply for and be granted a fee waiver for certain immigration benefits and services based on an inability to pay" pursuant to 8 CFR 103.7(c), Form I-912 is used as the standard form for submitting such requests. The proposed change would eliminate the 1 means-tested benefit category of eligibility, making it more difficult for individuals who are unable to pay a filing fee to request a fee waiver and be approved. As the City of Boston aims to increase access to opportunities rather than limit them, this public comment is written in opposition to the proposed change.</p> <p>I. The proposed change would affect the vast majority of fee waiver applicants for naturalization served by the City of Boston. Since the founding of the United States, immigrants have made Boston, Massachusetts their home. Now, nearly 28% of our City's population is foreign-born, an estimated 181,652 individuals. Through the Mayor's Office for Immigrant Advancement ("MOIA"), the City of Boston has been instrumental in providing support and resources to these individuals.</p>

ID	Comment.	Commentor	Comment
762	USCIS-2010-0008-1060	Andrea Lopez	<p>First of all, thank you for permitting us to comment on the proposed revision to the USCIS Request for Fee Waiver, Form I-912. After serving in the Latino community for almost 5 years, I have witnessed the hard work and the sacrifices people have made to be in this country. Many of these people work over 12 hours a day at multiple jobs just so they can make ends meet, and even then it is not enough. I have helped a single mother of two apply for citizenship for herself and her daughters, thanks to the means-tested benefits eligibility section on the current USCIS Request for Fee Waiver, Form I-912. All three of them are now U.S. citizens. Removing this benefit will present additional obstacles for individuals that are already suffering from lack of resources. I urge the agency not to adopt this new proposal, but rather continue accepting means-tested benefits as evidence of fee waiver eligibility.</p>

ID	Comment.	Commentor	Comment
764	USCIS-2010-0008-1063	Erin Hustings, Naturalization Working Group	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>We strongly oppose the USCIS proposal to stop accepting receipt of a means-tested benefit such as Medicaid as evidence that a person qualifies for an application fee waiver. The current standard is simple, reliable, and cost-effective. In contrast, the proposed change—published at 83 Fed. Reg. 49120 on Sept. 28, 2018—is unjustified, complex, and counterproductive. It would increase burdens on adjudicators, government agencies, applicants and community-based organizations that support them. It would reduce naturalization rates and cause all Americans to lose the economic and social benefits of naturalization.</p> <p>The undersigned organizations are members of the Naturalization Working Group (NWG), which is coordinated by the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund, and made up of national and local organizations committed to helping legal permanent residents (LPRs) become United States citizens. The NWG strives to improve federal policies and practices related to naturalization and to educate legislators and other policymakers about the need to address barriers to naturalization. Our coalition's expertise derives from its multiple member organizations that have significant experience in promoting naturalization and in assisting newcomers with the U.S. citizenship process, including immigrants who are serving in our military. The NWG is the policy complement to the New Americans Campaign (NAC), a diverse nonpartisan national network of respected immigrant-serving 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.</p> <p>1</p> <p>The Proposed Is Unjustified</p>
766	USCIS-2010-0008-1064	Eldaah Arango	<p>Hello I am very concerned with the changes to the fee waiver application process. I am a daughter of immigrants and now I help people in my church apply for immigration benefits. We are an recognized site and are authorized to practice immigration help. Many immigrant families receive low wages and sometimes do receive benefits. Many cannot afford to pay the fees. Sometimes they delay or never submit the required forms for lack of funds to pay for the applications. I hope that your office can continue to consider public benefits as a requirement for the fee waiver. Thank you for listening to our comments. God bless you.</p>

ID	Comment.	Commentor	Comment
768	USCIS-2010-0008-1089	Marisol Lister	<p>I am writing today to ask you to reconsider the proposed revisions to Form I-912 (request for fee waiver).</p> <p>Money is already a significant barrier for many people who are seeking to become naturalized. With the proposed revisions, this barrier will be magnified for low income individuals, especially for those not required to file income taxes. this places the burden of proof on the individual and limits its potential avenues for solutions.</p> <p>Additionally because income taxes are only filed once a year, changes in employment will will impact prompt reporting to USCIS further slowing down an already slow moving process.</p> <p>Eliminating the current verification method will only make it harder for those already struggling the most the take a legal path to naturalization.</p>
769	USCIS-2010-0008-1091	Connie Au	<p>I oppose the proposed changes to the fee waiver eligibility criteria as it adversely impacts the most vulnerable and makes it harder on those applying for the waiver. Current method of using the means-tested benefit letters works well and should continue to be an option to show income status for fee waiver eligibility.</p>

ID	Comment.	Commentor	Comment
772	USCIS-2010-0008-1099	Marjean Perhot, Catholic Charities Archdiocese of Boston	<p>Comment part 1 Catholic Charities Archdiocese of Boston opposes the U.S. Citizenship and Immigration Service’s (USCIS) proposed change to fee waiver eligibility criteria, USCIS Docket ID USCIS -2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. The proposed change will increase the burden on USCIS, its stated purpose does not justify the change, it does not further the mission of USCIS, and it will increase the burden on vulnerable individuals applying for immigration benefits and legal service providers.</p> <p>THE PROPOSED CHANGE WILL INCREASE THE BURDEN ON USCIS</p> <p>The proposed change states that the elimination of the option of submitting Form I-912 Request for Fee Waiver based on receipt of means-tested benefits will “expedite USCIS’s review, approval, or denial of the fee waiver request by clearly laying out the most salient data and evidence necessary for the determination of inability to pay.”</p> <p>In our experience, Form I-912 Requests for Fee Waiver based on means-tested benefits require less documentation than those based on income or financial hardship. The most common public benefits we see here in the Greater Boston area are SNAP (Supplemental Nutrition Assistance Program, administered by the Massachusetts Department of Transitional Assistance), TANF (Transitional Assistance for Needy Family, administered by the Massachusetts Department of Transitional Assistance), and MassHealth (Massachusetts’s Medicaid program, administered by the Massachusetts Office of Health and Human Services). These programs, among others, often produce a letter of verification of benefits succinctly confirming the I-912 applicant’s standing as a recipient of a means-tested benefit.</p> <p>On the other hand, income-based and hardship-based Requests for Fee Waivers often require multiple sources of documentation verifying the household’s sources of income, expenditures, and/or inability to pay. For successfully-granted applications based on income less than or equal to 150% of the Federal Poverty Guidelines, respondents must submit the most recent Federal Tax Return, W-2s, and/or their most recent pay stubs, for each contributing member of the household. This means that, as in many of these types of Fee Waivers we submit on behalf of clients, we must collect income documentation not only from the principal applicant, but also from other members of the household. This documentation could also be in the form of child support or other forms of income. Thus, typically the Requests for Fee Waivers based on income generally require much more documentation, which must ultimately be examined and verified by USCIS officers. By eliminating the option to apply for a Fee Waiver based on the applicant’s receipt of a public benefit, USCIS inevitably would be spending more of USCIS officers’ time and resources to evaluate each piece of evidence submitted in support of a Fee Waiver Request.</p> <p>Surely, there are ways to increase the efficiency of the adjudication of I-912 Requests for Fee Waivers. We find, however, that the elimination of the option to apply based on receipt of means-tested benefits would only exacerbate USCIS’s concerns about the amount of evidence being collected and adjudicated by USCIS Officers.</p>

ID	Comment.	Commentor	Comment
776	USCIS-2010-0008-1016	Raquel Brown	<p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018. I oppose the proposed change because it will restrict lawful permanent residents access to United States citizenship, and because it will impose an increased burden on legal service providers.</p> <p>Center for Employment Training's Immigration and Citizenship Program (CET-ICP) is a member of the New Americans Campaign and the Santa Clara County Citizenship Collaborative. We are the lead organization for the annual Citizenship Day event in Santa Clara County, which regularly draws over a thousand participants. At Citizenship Day, our collaborative provides lawful permanent residents with free information, eligibility screenings and application assistance. For the past five years, we have partnered with the Santa Clara County Department of Social Services to reach out to the thousands of non-citizens in our county who receive public assistance, and encourage them to apply for naturalization. Social Services staff attend our event and provide applicants with letters on the spot to document that they receive means-tested public benefits, which allows our staff and volunteers to efficiently complete their I-912 fee waiver applications at the same time as their N-400 applications. At our 2018 Citizenship Day event we completed 336 naturalization applications. Nearly two thirds of the applicants we assisted also completed fee waiver applications, the vast majority of which were based on receipt of means-tested public benefits, thanks to the collaboration with the Department of Social Services. Receipt of means-tested public benefits is by far the simplest way for an applicant to document his/her eligibility for a fee waiver as it requires the least</p>
777	USCIS-2010-0008-1153	Jennifer Skalbeck	<p>I strongly oppose the suggested changes to this rule as its effect would limit many low-income earners from being able to verify their eligibility for a fee waiver and therefore result in an additional barrier to citizenship for people with low-incomes. Requiring only an income tax return to prove eligibility will be a barrier for those people who because their earnings were so low were advised not to file a tax return. Other means of verification are necessary to avoid income discrimination in citizenship applications.</p>

ID	Comment.	Commentor	Comment
778	USCIS-2010-0008-1052	Corina Bogaciu, African Services Committee	<p>November 27, 2018</p> <p>Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of African Services Committee (ASC) in response to the U.S. Citizenship and Immigration Services, Department of Homeland Security's Notice of Proposed Rulemaking (NPRM or proposed rule) to express our strong opposition to the changes regarding Requests for Fee Waiver, published in the Federal register on 09/28/2018.</p> <p>Established in 1981, ASC is a multi service non-profit organization dedicated to improving the health and self-sufficiency of the African diaspora in New York City and beyond. Our services currently include civil and immigration legal services, case management, housing assistance, English classes, HIV and other medical testing, navigation to care, food pantry, community outreach, and HIV and immigration reform advocacy.</p> <p>The legal program at ASC serves approximately 1000 individuals annually, providing immigration representation as well as legal assistance in the areas of housing, family, public benefits, and advance directives. Many of our clients have fled persecution or unrest in their home countries and must overcome complex legal and social barriers to establish safe and secure new lives in the United States.</p> <p>A large number of our clients receive public assistance and use the means-tested benefit category to demonstrate eligibility for a fee waiver when applying for various immigration benefits. The proposed new policy eliminates such a category and requires that all applicants document their eligibility for a fee waiver extensively. Applicants would instead have to undergo a much more burdensome review of financial hardship and/or income below the poverty guidelines.</p> <p>We oppose such a rule because it will result in (1) an inability of eligible populations to apply for fee waivers, and (2) eligibility will have to be heavily documented.</p>
779	USCIS-2010-0008-1148	Entre Hermanos/OneAmerica	<p>33 years. I want to become a US citizen to provide safety for my family & I. The fee waiver is important because I am on SSI and have no other forms of income. It will make it harder to apply. My means tested, benefit is the best way I can prove that I need a fee waiver.</p>

ID	Comment.	Commentor	Comment
782	USCIS-2010-0008-1037	Casey Sherman, Colorado Legal Services	<p>Comment part 1 Dear Ms. Deshommes,</p> <p>In response to the proposed elimination of the receipt of public benefits as grounds for a fee waiver, Colorado Legal Services asks that USCIS reject this proposed policy. This change would be highly detrimental to our clients and Colorado Legal Services asks that Ms. Deshommes carefully consider the potential impact and reject implementation this policy.</p> <p>Colorado Legal Services hosts a special project that represents low-income, elderly, disabled, and individuals experiencing homelessness in obtaining Colorado IDs, replacing lost immigration documents, and resolving other identity-related legal issues.</p> <p>Public benefits are a helpful measure of financial means</p> <p>The expressed rationale for eliminating receipt of means-tested benefits as grounds for a fee waiver is that states utilize different income assessments, so waivers cannot be granted with uniformity across states. Based on our experience representing low-income people, we believe that receipt of means-tested benefits is an accurate and helpful way to assess financial means and needs.</p> <p>Waivers are only granted when the applicant, applicant's spouse, or head of household the applicant lives with is receiving a means-tested benefit. This limits the eligible beneficiaries to adults, or children who are requesting the waiver for themselves. Children's benefits, such as CHIP, have the highest income caps but that may only serve as the basis of a waiver if the child recipient is the person requesting the fee waiver. Despite some differences among states, the most common public benefits have relatively consistent income and asset assessments across jurisdictions. Nationally, the median income limit for the CHIP programs is 255% of the federal poverty level (FPL).¹ The national median income for pregnant women Medicaid programs is 200% of FPL.² These two programs, both serving very vulnerable populations, have the highest income levels of the most common means-tested benefits. All jurisdictions but one limit childless adult Medicaid eligibility to households below 139% FPL.³ All jurisdictions but one limit Medicaid for parents with dependent children to households below 139% FPL.⁴ SNAP is a federally regulated program that assesses gross income and net income, after certain expenses are considered, so the larger income caps are consistent across jurisdictions.⁵ Gross income is set at 130% FPL and net income is set at 100% FPL for SNAP programs.⁶ The current maximum individual Supplemental Security Income (SSI) payment is 76% FPL.⁷ Temporary Assistance for Needy Families (TANF) is restricted to families with dependent children earning below a state-determined income level. As of 2012, the majority of states capped income at \$795 per month for a single parent with two children.⁸ This means that most TANF recipients must be below 50% FPL, demonstrating the exceedingly low income limits for traditional cash benefits.</p> <p>The most commonly accessed adult benefits—SSI, SNAP, and childless adult Medicaid—all have limits below the 150% FPL standard that will remain if the means-tested benefit standard is eliminated.</p>
784	USCIS-2010-0008-1079	Upama KC	<p>I am against the proposed revision of the fee waiver because I believe the states already put resources to determine low-income eligibility for individuals. A state government will not grant means-tested benefits to individuals with high income. Why would DHS not accept proof of means-tested benefits as evidence of low income status as states have already established that the person receiving those benefits are low income?</p>

ID	Comment.	Commentor	Comment
787	USCIS-2010-0008-1023	Iris Gomez, Massachusetts Law Reform Institute (MLRI)	<p>Comment part 1 RE: Comments in Opposition to Docket ID USCIS-2010-0008, OMB Control No. 1615–0116, Proposed Rulemaking Concerning Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Chief Deshommes:</p> <p>Massachusetts Law Reform Institute (MLRI) and the undersigned legal services organizations and pro bono attorneys strongly oppose the proposed changes, published at 83 Fed. Reg. 49120 on Sept. 28, 2018, in the fee waiver process before U.S. Citizenship and Immigration Service. MLRI is a statewide legal services advocacy organization that advances laws, policies, and practices to secure economic, racial, and social justice for low-income people and communities. MLRI’s goals are to:</p> <ul style="list-style-type: none">☐ address public and institutional policies and procedures that either contribute to, or perpetuate, the cycle of poverty;☐ ensure that low-income and underserved populations across the state are provided the same legal protections, rights and liberties enjoyed by all members of society;☐ provide local legal services providers and community-based advocacy organizations that serve low income people with the substantive expertise, technical assistance, and support they need to best serve their clients. <p>MLRI serves as the poverty law support center for the Massachusetts civil legal aid delivery system and advocacy community. Our advocates provide expertise and support to local legal aid programs, social service, health care and human service providers, and community organizations that serve low income people throughout the state. A significant percentage of the clients whose interests we and our sister organizations serve receive means-tested benefits and/or have limited English language ability, education, and capacity to navigate complex legal systems such as the federal immigration system.</p> <p>The proposal to terminate USCIS’ acceptance of a means-tested benefit as evidence that a person</p> <p>qualifies for an immigration application fee waiver will negatively impact low-income</p>
789	USCIS-2010-0008-1024	Heather McKimmie	<p>I am an attorney that represents individuals with disabilities and this rule would negatively impact this population. By disallowing receipt of a means-tested benefit to prove eligibility for a fee waiver, these changes would needlessly complicate and lengthen the adjudication process, thereby harming people with disabilities seeking services. This rule change discriminates against individuals with disabilities and puts undue burdens on them. I oppose these changes to the fee waiver application process proposed by publication at 83 Fed. Reg. 49120 on Sept. 28, 2018.</p>

ID	Comment.	Commentor	Comment
791	USCIS-2010-0008-1164	Chiara Sulprizio	I object to the proposed revision to the fee waiver process. Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.
806	USCIS-2010-0008-0989	Anne Krassner	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. This initiative is a sham and like everything else Trump is doing good not favors the rich.
811	USCIS-2010-0008-0994	Carolyn Kim	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. This cost is exorbitant for an application fee. There should not be such a high economic barrier to have an application processed.

ID	Comment.	Commentor	Comment
813	USCIS-2010-0008-0841	Jay Reich	<p>This comment is in response to Docket ID number USCIS-2010-0008.</p> <p>I oppose this revision because it unnecessarily and unfairly limits the options of immigrants with the lowest incomes to seek a fee waiver.</p> <p>Immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>Many seniors with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p> <p>The argument that different states have different means testing does not provide a reasonable basis to withhold waivers or raise the standard for seeking a waiver. In a federalist system relying on states to create their own welfare standards provides protection to the federal government since it is in each state's interest to limit what it will provide in welfare benefits. Accepting such standards respects states' rights to act in their own self interest.</p>

ID	Comment.	Commentor	Comment
815	USCIS-2010-0008-0847	Bright Limm	<p>I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. Like many other rules promulgated by the Trump administration, this proposed rule is likely not only to further institutionalize xenophobia, racism, and enmity towards poor people at the federal level but also to increase the frequency and intensity of acts of xenophobia, racism, and animus against poor people committed by individual citizens. The rule must be withdrawn immediately.</p>

ID	Comment.	Commentor	Comment
823	USCIS-2010-0008-0840	Gabriel Pelly	<p>To Whom it May Concern,</p> <p>While the purported purpose of the rule change for fee waivers is to simplify and standardize the process, the effect will be just the opposite.</p> <p>My name is Gabe Pelly, I am an immigration paralegal by profession and I volunteer with citizenship clinics in my free time. Through these experiences I can confirm that the current fee waiver is sufficiently simple for the average person to complete. By contrast, the proposed changes will complicate and discourage from applying those who need the waiver the most. People with the lowest incomes -- especially the elderly and disabled -- who do not file tax returns will find it difficult or impossible to prove they are eligible, and they wont apply for citizenship at all.</p> <p>Using currently acceptable evidence of means-tested benefits, we can fill out a fee waiver at free workshops or in our legal office in less than 10 minutes. USCIS expects the new form to take 1.17 hours to complete. It is already hard for our clients to afford legal representation, a gap free workshops try to fill, but the burden of time and difficulty the new form will require will severely limit legal professional's abilities to provide free services to those in financial need.</p> <p>On these grounds I oppose this change.</p>

ID	Comment.	Commentor	Comment
825	USCIS-2010-0008-0846	Leah Clay-Youman	I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. Please do not punish people for temporarily accessing benefits to provide for their families during a time of need. This is cruel. As someone who claims to be a Christian, President Trump needs to act like one.
877	USCIS-2010-0008-0767	Garner Moulton	I oppose this new policy as it would create an unfair burden for low income people who wish to be citizens. We should continue the current practice of allowing individuals to verify their income using means-tested benefit letters.

ID	Comment.	Commentor	Comment
891	USCIS-2010-0008-0823	Yana Cosme	<p>My organization and I are very concerned about the proposed rule change on Fee Waiver Eligibility. Eliminating Means Tested Benefits as one of the basis for the Fee Waiver is a very bad idea. If someone is receiving benefits, that means that the State or Federal Agency that awarded them the benefits ALREADY screened them for eligibility based on their family situation. Why does USCIS needs to screen them again for the same benefit? USCIS adjudicators will be spending valuable time and resources on something that does not need to be done. Many immigrants and refugees on SSI or Basic Food do not file taxes and have zero taxable income. It will be very difficult for them to show their income and it will be also difficult for USCIS to approve FW, resulting in more time and resources spend on rejection and submission of the same FW packets.</p> <p>Please reconsider this proposal - USCIS will not benefit from this rule change - instead it will be more costly and time consuming to the agency.</p> <p>Thank you.</p>
892	USCIS-2010-0008-0824	Yanira Chacon-Lopez	<p>I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee waivers hurts immigrants who are unemployed, underemployed, unable to work, or retired. Immigrant communities apply for Green Cards, U.S. citizenship and other immigration services to seek better economic equity and opportunity, but this rule seeks to favor the wealthy over the rest of us. I strongly urge the Trump Administration to immediately withdraw this rule. I am in NY and I strongly opposed the end of the fee waiver rule it will rule negative impact for the unemployed, disabled and the retired.</p>

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907	USCIS-2010-0008-0906	Rebecca Schaeffer, Church World Service	<p>Comment part 1: Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of Church World Service (CWS) in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>CWS, founded in 1946, is a non-profit organization dedicated to promoting global community development through programs and partner organizations worldwide that support sustainable social and economic development. CWS is also dedicated to assisting vulnerable immigrant populations through our Immigration and Refugee Program (IRP). IRP is comprised of several departments that provide assistance to refugees and immigrants through our cooperative agreements with the U.S. Citizenship and Immigration Services (USCIS), the U.S. Department of State (DOS), and the Office of Refugee Resettlement (ORR), as well as private donations and grants.</p> <p>As part of our cooperative agreements with DOS and USCIS, CWS has assisted in resettling nearly half a million refugees and over seventy-thousand Cuban and Haitian entrants. IRP's legal component provides legal services to low income immigrants through our network of over twenty-one legal departments and affiliates located throughout the United States. Our legal departments consist of attorneys and accredited representatives that assist in providing immigration services at little to no cost to low income immigrants through various events.</p>
927	USCIS-2010-0008-0965	Jeremy Roose, Immigrant Legal Center	<p>The mean-tested benefit is a succinct method for applicants to prove their low-income status. Taking this criterion away will only make it more difficult for vulnerable applicants to improve their status.</p> <p>Please keep the means-tested benefit criterion as an option for fee waivers.</p>

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928	USCIS-2010-0008-0978	Dale Gish	This proposed change would only serve to deny the fee-waiver benefit to applicants residing in states with a higher cost of living. Why repeat the work of local agencies? What a person can afford greatly depends on the cost of living in balance with income. Both of these vary from state to state. Please do not eliminate receipt of means-tested benefits as a measure of granting fee-waivers to applicants.
930	USCIS-2010-0008-0986	Jeffrey Gustaveson	I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.

ID	Comment.	Commentor	Comment
931	USCIS-2010-0008-0985	wendy vasquez	<p>Hi, i am writing to urge USCIS to continue to grant the waiver of fees for citizenship based on receiving food stamps, Medicaid, etc. Having known many immigrants I have seen the deepening of commitment to our society that happens when people get their citizienship and feel secure and that their future is here. That is a huge positive for our society and communities. I work in a citizenship preparation program in Des Moines Iowa and the enthusiasm and hope of these immigrants is truly inspirational.</p> <p>The passion and love and gratitude these immigrants feel for the US is immense especially among people who have lived in poverty and violence in their home countries. Because of the impediments they often face of education and language many times they are low income here as they were in their home countries but this should not prevent them from taking the next step and embracing fully our country. They and their children are a renewing force for our society.</p> <p>Applying for citizenship is a very expensive process for a poor person. One of my coworkers has been saving for two years to put in applications for herself and her husband and just submitted it a couple of months ago.</p> <p>I have helped many people with Medicaid and food stamp applications. These programs require frequent and detailed proof of income and are totally effective in determining a person's economic status. It would be an unnecessary duplication of effort to require applicants and USCIS staff to go through all that documentation when it has already been done by another governmental agency. It would present another impediment to people applying for citizenship who would now have to get their tax information, verification from employers etc and be an additional expense for the government to go through the additional paperwork.</p> <p>I strongly feel that we should make citizenship more accessible, not less, and urge you to leave the fee waiver system as it is. Thank you for your attention.</p>

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935	USCIS-2010-0008-0999	Neal Dudovitz, Neighborhood Legal Services of Los Angeles County	<p>Comment part 1: November 27, 2018</p> <p>Submitted via wmv.. regulations.gov</p> <p>Samantha L. Deshommes, Chief, Regulatory Coordination Division Office of Policy and Strategy, U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS — 2010-008, Public Comment in Response to Proposed Rulemaking: Fee Waiver Request</p> <p>OMB Control Number 1615-0116</p> <p>Dear Ms. Deshommes:</p> <p>We write on behalf of Neighborhood Legal Services of Los Angeles County ("NLSLA"), in response to Department of Homeland Security's ("DHS") Notice of Proposed Rulemaking, to express our strong opposition to the proposed changes regarding fee waiver applications, published in the Federal Register on September 28, 2018.</p> <p>NLSLA is a non-profit legal services organization that assists indigent clients with a variety of rnatters, including immigration cases. We currently have over 275 immigration cases pending with USCIS. The vast majority of our clients are victims of crimes, mostly domestic violence and sexual assault. Over 95% of our clients apply for and receive fee waivers for their immigration applications, giving us a valuable perspective on how the new rule may impactimrnigrant applicants. We are deeply concerned that the proposed changes will create procedural obstacles for meritorious applicants as well as further burden the immigration system.</p> <p>I. The rule would heighten the evidentiary burden on applicants.</p> <p>While DHS contends that reducing evidentiary requirements is a justification for the proposed rule, in fact, this change actually increases the burden on applicants by requiring them to produce additional evidence of household income and financial hardship. He until now, our</p>

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940	USCIS-2010-0008-1010	Dinneen Cato on behalf of the Center for the Integration and Advancement of New Americans (CIANA)	<p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Center for the Integration and Advancement of New Americans (CIANA) in opposition to the proposed changes to the eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>CIANA is a non-profit organization dedicated to holistically integrating immigrant communities upon their arrival to the United States. We do this by providing various social services. A part of our services is to provide pro bono and low bono immigration legal services to low income immigrants. I am the staff attorney at CIANA, and I file various immigration applications to Unites States Citizenship and Immigration Services (USCIS), including naturalization and green card renewals.</p> <p>This proposal will have a tremendous negative impact on the immigrant community. It will discourage eligible applicants for applying for immigration benefits and fee waivers because of the undue burden it will put on them because it narrows the type of evidence that can be submitted to prove eligibility for the fee waiver.</p> <p>For many of our clients, the application fees for naturalization and green card renewals are too high and they depend on the fee waivers to apply for immigration benefits that they have a right to and which they are eligible to receive.</p> <p>We oppose the proposal because it does not allow an applicant to show evidence of receipt of a government-tested benefit as evidence of inability to pay application fees. We</p>

ID	Comment.	Commentor	Comment
943	USCIS-2010-0008-1014	Barbara J. Parker on behalf of the City Attorney and Mayor for the City of Oakland	<p>Comment part 1: Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140 Re: United States Citizenship and Immigration Services (USCIS) OMB Control Number 1615-0116 Docket ID USCIS-2010-0008 Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions Dear Ms. Deshommes: The City of Oakland, California (City) submits this comment in response to the United States Citizenship and Immigration Services' (USCIS') proposed changes to the fee waiver eligibility criteria (proposed rule), OMB Control Number 1615-0116, Docket ID USCIS-2010-0008.</p> <p>1 The City strongly opposes the proposed rule because it would impose additional burdens on Oakland immigrants and deter low-income, eligible residents from seeking immigration benefit applications and petitions, including naturalization, solely due to financial limitations.</p> <p>The City of Oakland is made up of racially and ethnically diverse individuals, both native-born and immigrants, whose collective cultures, backgrounds, and viewpoints join to form a cosmopolitan community. Oakland is home to approximately 425,000 residents, over a quarter of whom are foreign-born.² Of that population, 54% are not yet United States citizens.³ Oakland has a strong tradition of embracing and valuing its diversity and in turn</p>

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946	USCIS-2010-0008-1019	D. Douglas Keegan, Santa Cruz County Immigration Project (SCCIP)	<p>SANTA CRUZ COUNTY IMMIGRATION PROJECT (SCCIP) 406 Main Street Suite 217, Watsonville, CA 95076(831) 724-5667</p> <p>November 27, 2018</p> <p>Submitted via www.regulations.gov</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of the Santa Cruz County Immigration Project, a program of the Community Action Board of Santa Cruz County, in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Our organization has been providing immigration legal services free of charge to the local community since 1987. All our clients are low-income, and the majority are</p>

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986	USCIS-2010-0008-1075	Anu Joshi, New York Immigration Coalition	<p>Re: USCIS, OMB Control Number 1615-0116, Docket ID USCIS 2010-0008</p> <p>Comments in Response to Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Sir/Madam:</p> <p>I am writing on behalf of the New York Immigration Coalition in response to U.S. Citizenship and Immigration Services (USCIS) Notice of Proposed Rulemaking (proposed rule) to express our strong opposition to the proposed rule to amend regulations relating to the Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions published in the Federal Register on September 28, 2018.</p> <p>The New York Immigration Coalition (NYIC) represents over 200 organizational members and partners working on behalf of immigrants throughout New York State. The NYIC envisions a New York State that is stronger because all people are welcome, treated fairly, and given the chance to pursue their dreams. We achieve this by Representing the collective interests of New York’s diverse immigrant communities and organizations and devising solutions to advance them; advocating for laws, policies and programs that lead to justice and opportunity for all immigrant groups; and building the power of immigrants and the organizations that serve them to ensure their sustainability, to improve people’s lives and to strengthen our state. The NYIC places a particular emphasis on immigrant rights and access to justice, health policy, and education policy that affect our immigrant communities.</p> <p>Immigrants who are eligible for citizenship are New Americans who have been in the United States for years, if not decades. They originally came to the country in search of a better life and opportunity, became an integral part of communities across the nation, worked hard, and contributed to their families and the economy. These immigrants have the right to citizenship, as envisioned by the nation’s founders and created by the Constitution and federal law. As of 2016, 900,625 New Yorkers hold green cards and are eligible for citizenship. The proposed rule would</p>
990	USCIS-2010-0008-1081	Jocelyn Lui	<p>I oppose the proposed changes to the fee waiver eligibility process. By eliminating the means-tested benefit letter, you will hurt low-income immigrants in their process to become US Citizens. By doing away with the state verification documentation, it also creates more inefficiencies by duplicating an already well-tested eligibility process at the state level. It will create more burdens to federal agencies and consequently more burden for US taxpayer</p>

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995	USCIS-2010-0008-1088	Anthony Marino, Irish International Immigrant Center	<p>Dear Ms. Deshommes,</p> <p>We are writing to oppose the proposed changes that would eliminate receipt of a means-tested benefit as a basis for a waiver of certain filing fees.</p> <p>The Irish International Immigrant Center assists over 3,500 immigrants and refugees annually from more than 120 countries as they integrate into American society. We are Boston's Welcome Center for immigrant families, providing a comprehensive range of immigration legal, education, and wellness services.</p> <p>Our clients are low-income immigrants and refugees from every part of the world. The vast majority of the families we serve qualify as low-income according to the Federal Department of Health and Human Services guidelines. Some live in shelters and subsidized housing, and the majority face significant daily economic challenges. Our clients are made up of refugees and asylees, immigrant children with debilitating diseases and their families, individuals with disabilities, and the elderly. We know from experience that the best way we can help our clients and their families achieve self-sufficiency is by helping them obtain immigration status or citizenship. Given the vulnerability of the communities we serve, and knowing the enormous positive impact that immigration status and especially citizenship can have, we are deeply concerned at this misguided and potentially devastating proposal.</p> <p>The proposed change is actually counterproductive to the "reasons" cited by the Department of Homeland Security (DHS), and the proposal gives no purpose or end that the change could rationally serve. Under the heading "Reason for Changes" in the proposed document, the Department first misstates its proposal, claiming it will be "reducing the evidence required for Form I-912" and will "no longer require proof of whether or not an individual receives a meanstested benefit." The proposed change, as further explained below will in fact increase the required evidence, as well as the time and effort required to adjudicate waiver applications. Contrary to the Department's proposal, the current practice does not require proof of receipt of a</p>

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998	USCIS-2010-0008-1093	Ellen Katz, William E. Morris Institute for Justice	<p>Comment part 1: Dear Ms. Deshommes:</p> <p>The William E. Morris Institute for Justice (“Institute”) is a non-profit program in Arizona that advocates on behalf of low-income Arizonans, including immigrants. The Institute submits the following comments in response to the Department of Homeland Security’s Notice of Proposed Rulemaking changing criteria for receipt of fee waivers among applicants for certain immigration benefits. The Institute represents immigrant families on systemic issues arising in many forums. On specific area we work on is access to the courts and the use of fee waivers and deferral to effectuate that access for low-income persons.</p> <p>The Institute Center strongly opposes changes to regulations that would limit access to certain United States Citizenship and Immigration Services fee waivers by eliminating the current policy of considering means-tested benefits as evidence of the need for a waiver and replacing it with a hard income cap. The proposed changes are not supported by the rationale offered by USCIS; would cause detrimental harm to the communities we serve;and would not create any demonstratable benefits for the agency. Furthermore, estimates indicate that the proposed changes would reduce the total population of people eligible for a fee waiver by two-thirds, resulting in two discrete harms. First, unavailability of fee waivers will deter eligible applicants from pursuing naturalization and or requesting proof of status, unfairly excluding them from critical immigration benefits based on an inability to pay. Second, immigrants who do find a way to pay application fees they cannot afford in order to seek immigration benefits or proof of status will suffer financial harm resulting from the high cost of these applications. In each case, it is clear that the proposed change shifts the cost of immigration services applications to those least able to afford them. For these reasons, elaborated upon below, we request that United States Citizenship and Immigration Services withdraw this proposed rule and continue processing fee-waivers pursuant to its current policy.</p>
1010	USCIS-2010-0008-1108	Emily Rendon	<p>I think that fee waivers are helping unemployed, disabled, retired, and low income families to apply for documents that they need. If means-tested benefit are eliminated, it will narrow the opportunities to those who can not afford it.</p>

ID	Comment.	Commentor	Comment
1011	USCIS-2010-0008-1110	Allison Bovell- Ammon, Children's HealthWatch	<p>Dear Ms. Deshommes:</p> <p>We write to you on behalf of Children’s HealthWatch, a network of pediatricians, public health researchers, and child health and policy experts, to express our concerns regarding the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116. Children’s HealthWatch is committed to improving children's health in America. Every day, in urban hospitals across the country, we interview families of young children ages zero to four, many of whom are experiencing economic hardships. Over the past 20 years, we have surveyed more than 65,000 caregivers. We analyze our data and release our findings to researchers, legislators, and the public to inform public policies and practices that can give all children and their families equal opportunities for healthy, successful lives.</p> <p>We know immigrant families are an integral part of our communities —they are our neighbors, coworkers, friends, and fellow parents. Even though US citizen children with an immigrant parent are more likely to live in a family with a full-time worker compared to children of US-born parents,¹ their families disproportionately experience economic hardships^{2,3} associated with adverse health and developmental outcomes for young children. ^{2,4,5,6,7} These economic hardships are exacerbated by existing federal and state policies that create barriers to stable employment with living wages, and other resources including assistance programs necessary to afford basic family necessities like food, shelter and health care for families with low incomes.^{8,9}</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant families. We are particularly concerned about the removal of receipt of means-tested benefits as the basis for qualifying for the fee waiver. Immigration experts report the filing fee associated with various immigration benefits can be an insurmountable obstacle for an immigration benefit or naturalization application. The proposed changes to the fee waiver application and acceptable documentation will discourage eligible individuals with low incomes from filing for both immigration and</p>
1023	USCIS-2010-0008-1132	Kevin Bank	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment

ID	Comment.	Commentor	Comment
1037	USCIS-2010-0008-1152	Hieu Nguyen, Korean Women's Association	<p>Comment part 1: November 26', 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>We're writing to strongly oppose the USCIS proposal to stop accepting receipt of a meanstested benefit as evidence that a person qualifies for an application fee waiver.</p> <p>Korean Women's Association (KWA) is a multi-service organization that delivers an extensive variety of amenities for immigrants, refugees, and individuals who are aging or living with disabilities. Founded in 1972, the Korean Women's Association (KWA) has proven to be a leader in serving needs of immigrants and refugees throughout Washington State. KWA provides services in 20 programs to more than 150,000 clients annually. The Korean Women's Association has closely forty-five years of experience in providing social services to refugees and immigrants, and those programs were funded by Federal, State and other grants. Since 1997, KWA has helped thousands of U.S. immigrants and refugees improve their lives by becoming U.S. citizens. The program was launched in response to the 1996 national welfare and immigration reform legislation limiting non-citizens access to public benefits. KWA offers the multilingual Citizenship services including: Intake screening for citizenship qualification; assistance with completion and submittal of the Application for Naturalization form; assistance in obtaining disability exceptions; fee waiver requests; preparation for Naturalization test; Naturalization interview assistance; citizenship training and instruction, including classes in American history and civics; English language</p>
1045	USCIS-2010-0008-1165	Renata Browne	<p>As a U.S. Citizen who has received means-tested benefits in the state of California, I know how hard it is to prove income to qualify for services, and it seems that this proposed change would only serve to deny the fee-waiver benefit to applicants residing in states with a higher cost of living. Why repeat the work of local agencies? What a person can afford greatly depends on the cost of living in balance with income. Both of these vary from state to state. Please do not eliminate receipt of means-tested benefits as a measure of granting fee-waivers to applicants.</p>

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1063	USCIS-2010-0008-1183	Khoua Xiong-X-Toyed	USCIS should allow low income people to obtain income verification from their state or federal agency like a benefit verification letter to prove their eligibility for fee waiver.
1064	USCIS-2010-0008-1184	Renee Robbins	<p>The basic values in the history of this nation is not to favor the wealthy over the poor: therefore we don't have a "debtor's prison"; neither should it be easier to apply for citizenship if one is wealthy. Rather than discouraging people from taking the step of joining the USA citizenry, we should be welcoming all who want to take part in our democracy.</p> <p>Please do not remove the means-based test and please allow medicaid, SNAP and other benefits to be proof of a future citizen's inability to pay the \$750 application fee.</p>
1065	USCIS-2010-0008-1185	Joseph Lachman	<p>I strongly oppose the Fee Waiver rule because it will divide and punish our immigrant communities. Denying means-tested benefit fee waivers and only accepting income-based fee hurts immigrant families who do not even make enough to file an income tax return. This will hurt my relatives ability to be reunited with the rest of our family.</p> <p>Note: this comment is being submitted anonymously and I am certifying that the information is factual.</p>

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1069	USCIS-2010-0008-1189	Eric Garcetti on behalf of the City of Los Angeles	<p>Comment part 1: November 27, 2018</p> <p>Ms. Samantha Deshommes Chief, Regulatory Coordination Division DHS, USCIS, Office of Policy and Strategy 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Request for Public Comment on Proposed Regulation: "Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions" - OMB Control Number: 1615-0116; Docket Number: USCIS-2010-0008</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of the City of Los Angeles, I am respectfully writing to voice concern with the proposed rule change impacting prospective fee waiver applicants.</p> <p>Los Angeles city and county are home to some of the most diverse immigrant populations in the country. We estimate that as many as 750,000 residents in Los Angeles County are eligible to apply for naturalization, including 350,000 in the City of Los Angeles. This proposed policy change would negatively impact the many residents who are eligible for naturalization but are unable to cover the costly price of the N-400 application.</p> <p>For many years, low income immigrants applying for a full or partial fee waiver for their application could use their means-tested public benefits to demonstrate their eligibility. The rise in the N-400 application fee over the past 20 years has made it more difficult for many qualifying legal permanent residents to cover the cost of applying for citizenship. Removing means-tested benefits from the calculation for tens of thousands of families, as proposed by this policy change, would dramatically cut the pool of eligible applicants who qualify for citizenship and need a small degree of financial aid.</p>
1074	USCIS-2010-0008-1194	Michael Freeman	I am requesting that you dont change the USCIS fee waiver rules. Allow people to be able to quality through a means-tested benefit.
1107	USCIS-2010-0008-1227	Magdalena Cazarez	USCIS is proposing to discontinue receipt of a means-tested benefit as a basis to qualify for a fee waiver. This means that many LPRs who cannot afford the \$725 filing fee to become citizens would instead have to undergo a much more onerous review of financial hardship and/or income below the poverty guidelines. Taking away this criterion will make it harder for vulnerable and low-income immigrants to become U.S. citizens.

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1134	USCIS-2010-0008-0411	Veronica Serrato, Project Citizenship	<p>Comment part 4: III. The Proposed Change will not enhance the quality, utility, or clarity of the information to be collected.</p> <p>The current system allowing for demonstrating eligibility through means-tested benefits is efficient. Applicants have already provided information to federal and state agencies and met rigorous tests. The Proposed Change creates duplicative work for the applicants and government agencies. USCIS will be collecting information already collected by federal and state agencies and making determinations those agencies have already made. This will create additional work that serves no further purpose.</p>

ID	Comment.	Commentor	Comment
1186	USCIS-2010-0008-0998	Julie Pasch, Houston Immigration Legal Services Collaborative	<p>Comment part 1: Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9/27/18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>We are writing on behalf of the Houston Immigration Legal Services Collaborative (HILSC") in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>Statement of Interest</p> <p>The Houston Immigration Legal Services Collaborative is a collaborative organization of over fifteen nonprofit immigration legal services providers in the Greater Houston area, as well as over thirty social services agencies and advocacy organizations serving Houston's immigrant communities. Our staff have years of experience representing immigrants before USCIS in a variety of immigration matters. Virtually all of the immigrants our staff members have represented before USCIS would generally be considered low-income, with incomes below 187.5%, 150%, or 125% of the Federal Poverty Guidelines, depending on the requirements of the nonprofit agencies.</p> <p>Summary</p> <p>HILSC opposes the proposed revision to Form 1-912 and requests that USCIS withdraw this proposed revision. Eliminating access to fee waivers through demonstrated receipt of a meanstested benefit will prevent many qualified, low-income immigrants from submitting applications for</p>

ID	Comment.	Commentor	Comment
1187	USCIS-2010-0008-0998	Julie Pasch, Houston Immigration Legal Services Collaborative	<p>Comment part 2: Receipt of a Means-Tested Benefit Accurately Reflects an Individual's Current Situation</p> <p>Determining whether an immigrant qualifies for a fee waiver based on the receipt of a means-tested benefit is an appropriate method for determining eligibility because it may more accurately reflect their current financial situation than income tax returns. In Texas, recipients of means-tested benefits such as Supplemental Nutrition Assistance Program ("SNAP") must report changes in income or other financial circumstances within ten days.¹ Additionally, many elements of a person's financial situation beyond income are considered when determining their eligibility (or continued eligibility) for means-tested benefits. For example, in Texas, recipients must report changes in: sources of income, household composition, ownership of a licensed vehicle, wage rate or status for all employed household members, residence and associated changes in shelter costs such as rent/mortgage and utilities, changes in unearned income if the amount changes by more than \$50, and various other income changes.²</p> <p>As a result, the receipt of means-tested benefits in Texas means that the state has determined eligibility based on information that is as little as ten days old and is significantly more nuanced than the previous year's tax returns.</p> <p>Furthermore, in Texas, applicants for SNAP and other means-tested benefits must generally recertify their eligibility every six months.³ Thus, a current means-tested benefits letter is a much more current view of an applicant's current financial situation than tax returns which could reflect income from as much as twelve to sixteen months prior to the application. This is particularly important to Houston-area applicants who are still recovering from Hurricane Harvey and whose financial situation may have changed dramatically from 2017 to 2018.</p> <p>A study by the Kaiser Family Foundation and the Episcopal Health Foundation of the experiences of immigrants under Harvey shows that immigrants were disproportionately affected by the hurricane. ⁴For instance, about three-quarters (74 percent) of Houston area immigrants were affected by some type of property damage to their home or vehicle and/or some form of job or income loss, compared to 62 percent of native-born residents. ⁵ 64% reported employment and</p>

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1198	USCIS-2010-0008-0956	Zenobia Lai, Catholic Charities - Houston	<p>Comment part 1: November 27, 2018</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>RE: Public Comment to Proposed Revision U.S. Citizenship and Immigration Services (Docket ID USCIS-2010-0008)</p> <p>Dear Ms. Deshommes:</p> <p>St. Frances Center for Immigrant Legal Assistance of Catholic Charities of the Archdiocese of Galveston-Houston (Cabrini Center) welcomes the opportunity to submit this comment to the proposed revision to the current fee waiver process, Docket ID USCIS-2010-0008, 83 FR 49120. The proposed revision, if approved, will eliminate a key form of evidence that two-thirds of those eligible for fee waiver use to establish fee waiver eligibility. The proposed revision directly harm immigrants who have the least financial means. It is in the Catholic tradition of pursuing the common good and care for “the least of these” and for the reasons stated below, we submit this comment opposing the proposed revision.</p> <p>I.Background about Catholic Charities and Cabrini Center</p> <p>Catholic Charities of the Archdiocese of Galveston-Houston (Catholic Charities) is a 75-year-old organization established to serve the social needs of low-income residents of Greater Houston. It has four impact areas: nurture and care for children, strengthen families, promote independence for seniors and other vulnerable adults, and support refugees and immigrants. Annually, Catholic Charities serves more than 82,000 individuals through its various programs with a mission of helping those in need to achieve self-sufficiency and live with dignity.</p> <p>Cabrini Center is the immigration legal services division of Catholic Charities. Since its founding in the late 1970s, Cabrini Center has focused on providing high-quality, free to low-cost immigration legal services to low-income refugees and immigrants in Greater Houston. Over the years, Cabrini Center has expanded our scope of service from helping immigrants and refugees through family reunification, adjustment of status and naturalization, to representing victims of crime, domestic violence or human trafficking seek immigration protection, as well as assisting those fleeing persecution seek safe refuge in the U.S. to more recently, providing legal assistance to unaccompanied minors. One of the very successful programs of Cabrini Center is to help former refugees, asylees and eligible Lawful Permanent</p> <p>Residents apply to become U.S. Citizens to enable them to fully participate in the economic, political and social life of American society. Many of our clients are long</p>

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1199	USCIS-2010-0008-0956	Zenobia Lai, Catholic Charities - Houston	<p>Comment part 2: II. Proposed Revision Eliminating Receipt of “Means-tested” Benefits as Evidence to Support Fee Waiver Eligibility Disproportionately Burdens Those with Very Low Income.</p> <p>In the proposed revision, USCIS will stop accepting receipt of a means-tested benefit such as Medicaid, Supplemental Security Income, Temporary Assistance to Needy Families or Supplemental Nutritional Assistance as evidence that a person qualifies for fee waiver. The reasoning provided by the USCIS is that “the various income levels used in states to grant a means-tested benefits result in inconsistent income levels being used to determine eligibility for a fee waiver.” 83 FR 49120, 49121. In lieu of adjudicating a fee waiver request based on evidence of receipt of “means-tested benefits,” USCIS “will retain the poverty-guideline threshold and financial hardship criteria.” Id. In effect, the proposed revision is not merely changing the types of documents used to adjudicate a fee waiver request, USCIS is changing, wholesale, how fee waiver requests are adjudicated.</p> <p>Since 2007 when USCIS made a major revision to the immigration fee scheme, e.g. more than doubling the cost for an application for adjustment of status from \$325 to \$930,¹ USCIS has implemented a fee waiver process to allow those with limited means to seek a fee waiver.² Initially individual could seek a fee waiver by submitting an affidavit explaining his/her financial situation. More commonly, however, individuals demonstrate eligibility for fee waiver by providing evidence of qualification or receipt of a “federal means-tested public benefits.”³ A fee waiver request may be made on the USCIS form that was first published on November 23, 2010 or applicant-generated fee waiver request. The guidelines in adjudicating fee waiver requests are included in several policy memoranda published in the Adjudicator’s Field Manual. The latest revised Policy Memorandum issued on March 13, 2011, reaffirmed that “fee-waiver request will be reviewed by considering, in a step-wise fashion, whether the applicant is receiving a means-tested benefit, whether the applicant’s household income level renders him or her unable to pay, or whether recent financial hardship otherwise renders him or her unable to pay.”⁴ By removing the consideration of an individual’s receipt of “means-tested benefits,” USCIS essentially is proposing to cut the first step of the adjudication process and eliminate one class of applicants from being considered for fee waiver. Those individuals also happen to be the poorest of applicants for immigration benefits.</p> <p>By eliminating one form of reliable indicator of an applicant’s ability to pay based on receipt of means-tested benefits, the proposed revision allows USCIS officer to have total discretion in making fee waiver adjudication. Such discretion will potentially disqualify many applicants who have financial hardship in receiving fee waivers and thus put critical immigration benefits such as naturalization, document replacement or employment authorization out of reach for those who have limited financial means. It is no wonder that the estimated number of respondents using form I-912 was reduced by 252,400 individuals within 8 months from a projected 602,528 in the January 2018 Federal Register notice⁵ to 350,128 by this notice dated September 27, 2018.⁶</p> <p>The current standard is simple, reliable, and cost-effective. Not only is the proposed revision creates undue burden on those who are most economically disadvantaged, it would also increase burdens on adjudicators, government agencies, applicants and community-based organizations that support them. It would</p>

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1233	USCIS-2010-0008-0742	Iveth Lopez, Chicanos Por La Causa	<p>Comment part 2: Eliminating Receipt of Benefits as Proof of Fee Waiver Eligibility Is An Extraordinary and Indefensible Proposal</p> <p>Streamlining and modernizing the immigration services application process is a laudable goal, but this proposed change contravenes it. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCIS's proposal would make that process more complicated, expensive, and paperwork-heavy — in direct derogation of the agency's stated intention to simplify adjudications.</p> <p>Withdrawing the most simple and unambiguous method of demonstrating fee waiver eligibility departs from the historical precedent of progress toward greater efficiency in USCIS adjudication. Efficiency is enshrined in USCIS's mission statement, and its pursuit is reflected in such initiatives as creation of an electronic filing system, and elimination of the previous requirement to file a separate biographical information form (G-325A) with applications for adjustment of status. The current proposal will increase time and dollar costs imposed upon every entity involved in administering fee waivers, including the USCIS, the Internal Revenue Service, other government agencies - and applicants themselves.</p> <ul style="list-style-type: none">• In preparing a fee waiver with the proposed changes it will require staff members to spend additional time with the client that may require more than one visit to complete an approval fee waiver. This may delay the submission of their application for an immigration benefit. In addition, the clients might encounter high fees from "notaries" in our area when submitting fee waiver that might not be approvable. <p>This proposal also departs from the federal government's longstanding appreciation of the special benefit that naturalization confers by making our nation stronger and more prosperous. As the numbers of naturalized citizens and organizations assisting them have grown, researchers have amassed more extensive data that have sharpened our understanding of the many benefits that flow from individuals decisions to naturalize. Increasingly, Congress and other policymakers have responded by calling on USCIS to promote naturalization, make it</p>

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1243	USCIS-2010-0008-1159	Muhammad Akhtar, Chinese Community Center of Houston	<p>Comment part 3: Eliminating Receipt of Benefits as Proof of Fee Waiver Eligibility Is An Extraordinary and Indefensible Proposal</p> <p>Streamlining and modernizing the immigration services application process is a laudable goal, but this proposed change contravenes it. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCIS’s proposal would make that process more complicated, expensive, and paperwork-heavy – in direct derogation of the agency’s stated intention to simplify adjudications.</p> <p>Withdrawing the most simple and unambiguous method of demonstrating fee waiver eligibility departs from the historical precedent of progress toward greater efficiency in USCIS adjudication. Efficiency is enshrined in USCIS’s mission statement, and its pursuit is reflected in such initiatives as creation of an electronic filing system, and elimination of the previous requirement to file a separate biographical information form (G-325A) with applications for adjustment of status. The current proposal will increase time and dollar costs imposed upon every entity involved in administering fee waivers, including the USCIS, the Internal Revenue Service, other government agencies - and applicants themselves.</p> <p>The Chinese Community Center is a small non-profit organization, and the change in the fee waiver policy would greatly increase our caseload of what to process for our clients, thus reducing our capacity to serve a greater number of deserving people in our community.</p> <p>This proposal also departs from the federal government’s longstanding appreciation of the special benefit that naturalization confers by making our nation stronger and more prosperous. As the numbers of naturalized citizens and organizations assisting them have grown, researchers have amassed more extensive data that have sharpened our understanding of the many benefits that flow from individuals’ decisions to naturalize. Increasingly, Congress and other policymakers have responded by calling on USCIS to promote naturalization, make it more accessible to eligible legal permanent residents, and encourage English-language learning and civics instruction; USCIS, in turn, has created the Office of Citizenship, administered grants, and undertaken extensive community education and mobilization to achieve these goals. It is in the best interests of all Americans and consistent with our nation’s values to make naturalization and other immigration services more accessible to eligible newcomers. The agency’s fee waive application proposal is inconsistent with USCIS’s mission, and runs counter to the goals it has otherwise pursued.</p> <p>As aforementioned, more than eighty percent of our clients have qualified for the fee waiver on the basis of means-tested benefits, so the decision to take away means-tested benefits as a qualifier for the fee waiver disproportionately affects hardworking low-income individuals and families that are already expending all possible resources to achieve their American dreams. This decision by USCIS would ultimately turn naturalization into the purview of the wealthy moreso than it already is.</p> <p>Conclusion</p> <p>We appreciate your consideration of these comments, and stand ready to work with USCIS to further streamline application procedures while preserving robust access to naturalization and other services that increase the prosperity and well-being of communities across our country. To that end, we strongly urge you to maintain the current fee waiver application process and the guidelines set forth in Policy Memorandum DM-603-0011-1.</p>

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1261	USCIS-2010-0008-1073	Miko Tokuhaman- Olsen on behalf of Legal Aid Society of San Diego, Inc.	Comment part 3: Third, the proposal eliminates an individual’s ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees.

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1310	USCIS-2010-0008-0926	Eli Cohen, New York City Bar Associations Immigration and Nationality Law Committee	<p>Comment Part 4: c. The Proposed Rule Changes Are Not Supported by Evidence That the Changes Are Needed</p> <p>USCIS does not provide any meaningful rationale for the Proposed Rule changes, let alone evidence that the changes are needed. This alone is a reason for USCIS to decide to maintain the status quo when it comes to the process of granting fee waivers.</p> <p>III. CONCLUSION</p> <p>In conclusion, the Proposed Rule eliminating the means-tested benefit category on the Form I-912 would significantly burden applicants, legal service providers, USCIS, and other government agencies while hurting many of society's most vulnerable immigrants. The City Bar urges the Department of Homeland Security not to replace a sensible analysis of need with an unnecessarily complex analysis that is less efficient and less standardized than the means-tested benefit category.</p> <p>Respectfully, Immigration & Nationality Law Committee Victoria F. Neilson, Chair</p>

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1364	USCIS-2010-0008-1046	Carmen Ramirez	<p>Comment part 2: Eliminating Receipt of Benefits as Proof of Fee Waiver Eligibility Is An Extraordinary and Indefensible Proposal</p> <p>Streamlining and modernizing the immigration services application process is a laudable goal, but this proposed change contravenes it. There is no credible evidence that the existing fee waiver application process creates a problem that needs to be remedied, and the USCIS’s proposal would make that process more complicated, expensive, and paperwork-heavy – in direct derogation of the agency’s stated intention to simplify adjudications.</p> <p>Withdrawing the most simple and unambiguous method of demonstrating fee waiver eligibility departs from the historical precedent of progress toward greater efficiency in USCIS adjudication. Efficiency is enshrined in USCIS’s mission statement, and its pursuit is reflected in such initiatives as creation of an electronic filing system, and elimination of the previous requirement to file a separate biographical information form (G-325A) with applications for adjustment of status. The current proposal will increase time and dollar costs imposed upon every entity involved in administering fee waivers, including the USCIS, the Internal Revenue Service, other government agencies - and applicants themselves.</p> <p>This proposal also departs from the federal government’s longstanding appreciation of the special benefit that naturalization confers by making our nation stronger and more prosperous. As the numbers of naturalized citizens and organizations assisting them have grown, researchers have amassed more extensive data that have sharpened our understanding of the many benefits that flow from individuals’ decisions to naturalize. Increasingly, Congress and other policymakers have responded by calling on USCIS to promote naturalization, make it more accessible to eligible legal permanent residents, and encourage English-language learning and civics instruction; USCIS, in turn, has created the Office of Citizenship, administered grants, and undertaken extensive community education and mobilization to achieve these goals. It is in the best interests of all Americans and consistent with our nation’s</p> <p>interests to make naturalization and other immigration services more accessible to eligible</p>

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1367	USCIS-2010-0008-1049	Alvina Yeh on behalf of the Asian Pacific American Labor Alliance, AFL-CIO (APALA)	<p>Comment part 2: Despite Moderate Success, Southeast Asian Americans are still Impacted by High Rates of Poverty and Language Barriers</p> <p>SEAA communities are particularly sensitive to changes to fee waivers eligibilities. They encompass some of the highest rates of limited English proficiency (LEP) and poverty of all racial and ethnic groups in the United States. According to U.S. Census estimates from 2011-2015, 38.3% of Cambodian, 36.7% of Hmong, 34.5% of Lao, and 48.6% of Vietnamese households that speak English less than “very well,” compared to 8.6% of total US households. Because of high LEP rates, many require the assistance of translators in their application process, increasing burdens on already under resourced community-based organizations or further increasing the costs of applying for applicants hiring private services.</p> <p>SEAA communities also experience poverty at high rates, with 11% of Lao families, 13% of Vietnamese families, 14.9% of Cambodian families, and 16.3% of Hmong families still living below the poverty line. As such, these communities rely heavily on programs like SNAP and Medicaid to help support their livelihoods and demonstrate the reliability of means-tested public benefits as a primary evidence of financial hardship. Because of these communities’ low English ability, high poverty, and reliance on welfare programs, removing automatic waivers only further decreases the ability of SEAA’s from naturalizing.</p>

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1371	USCIS-2010-0008-1050	Sarang Sekhavat, Massachusetts Immigrant and Refugee Advocacy Coalition	<p>Comment part 2: Agency Has Not Justified This Change</p> <p>MIRA believes that USCIS has not provided any justification for eliminating the means-tested benefit from the 1-912. In the notice published on September 28th, the agency claims that, "The proposed revision would reduce the evidence required for Form 1-912 to only a person's household income and no longer require proof of whether or not an individual receives a means-tested benefit." This statement is — at best — disingenuous. The implication in this statement is that the current version of the form requires evidence of both income and receipt of mean-tested benefit. However, that is not how the fee waiver works; applicants for a fee waiver must show either income below 150% FPL or receipt of a means-tested benefit, not both. As stated earlier, evidence of receipt of a means-tested benefit is generally less burdensome than evidence of income. Requiring that all applicants for a fee waiver supply evidence of income would actually do the opposite of what the agency claims and increase the evidence required.</p> <p>The agency also attempts to justify its actions by stating that, "USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver." MIRA finds this argument to be unpersuasive. It is true that various states use different income levels to determine eligibility for means-tested benefits, but this is due to variations in cost-of-living from state to state. An income of \$18,210 (150% of FPL for a household of one) does not go as far in Massachusetts as it would in New Hampshire, for example. 8 CFR §103.7(c) allows for fee waivers where the applicant is, "unable to pay the prescribed fee." Cost-of-living plays a major role in an individual's ability to pay the prescribed fee, and states have set income levels for means-tested benefits in response to the local cost of living. In effect, the income levels used by states removes from USCIS the burden of determining whether an individual is able to pay the prescribed fee.</p> <p>MIRA is strongly opposed to the proposed changes to the existing fee waiver and respectfully requests that USCIS not proceed with the form revision. Thank you for providing us with the opportunity to</p> <p>submit this comment and for your consideration of its contents. If you have any questions or concerns</p>

ID	Comment.	Commentor	Comment
1374	USCIS-2010-0008-1053	Michael Santomauro DePaul University Asylum & Immigration Law Clinic	<p>Comment part 1: VIA www.regulations.gov comment form: Nov. 27, 2018 Samantha Deshommes, Office of Policy and Strategy Regulatory Coordination Division U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Ave. NW Washington, DC 20529-2020 Re: OMB Control Number 1615-0116 USCIS, Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions Docket ID Number USCIS-2010-0008 Dear Sir or Madam:</p> <p>We are writing to submit comments for consideration in response to the agency’s proposed revision regarding the U.S. Citizenship and Immigration Services (“USCIS”) Fee Waiver, Form I-912 published in the Federal Register on Sep. 28, 2018.</p> <p>1 We would like to thank the government for the opportunity to respond to this Federal Register announcement regarding the revision of the USCIS Request for Fee Waiver, Form I-912.</p> <p>Statement of Interest DePaul University Asylum & Immigration Law Clinic (AILC) collaborates with over 31 community-based organizations (CBO) throughout the state of Illinois2 to enhance access to legal information and systemically complement the provision of immigrant legal services within organizations of limited resources. The not-for-profit organizations with</p>

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1375	USCIS-2010-0008-1053	Michael Santomauro DePaul University Asylum & Immigration Law Clinic	<p>Comment part 2: Maintain the Long-standing Policy of Receipt of a Means-tested Benefit Based Eligibility</p> <p>The USCIS proposed revision eliminates the long-standing, commonsense, and administrable eligibility determination of fee waiver requests based on an individual's receipt of a means-tested benefit. The USCIS previously stated position for reliance on means-tested benefits programs as evidence of inability to pay, that is, receipt of a means-tested public benefit, represents another agency's independent assessment of economic circumstances. See "CIS Ombudsman Teleconference: Fee Waivers: How Are They Working for You? September 30, 2009." Most if not all means-tested programs will at least require examination of income in order to determine eligibility. For example, the Illinois Department of Public Aid has income eligibility requirements for receipt of state conferred benefits, including Supplemental Nutritional Assistance Program and certain medical coverage.</p> <p>Since these programs consider income as part of the eligibility determination, receipt of a means-tested benefit is often the most reliable indicator of the household poverty level and an inability to pay. Consequently, we urge the USCIS to reconsider the proposed elimination of receipt of means-tested benefit based eligibility when adjudicating fee waiver requests.</p> <p>Additionally, at a recent tour of the Chicago USCIS Lockbox on Apr. 27, 2018, the Intake Operations Division staff expressed with AILC the value to the agency and the customer of a bright-line test for adjudication of fee waiver requests. CBO partners have shared this experience during USCIS Chicago Lockbox tours as well. The USCIS fails to consider this practical, administrative consideration in its Federal Register notice.</p>

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1395	USCIS-2010-0008-1086	Sandy Santana, Children's Rights	<p>Comment part 3: III. The proposed change will engender inconsistent determinations. USCIS states as a justification for the proposal that "various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility."⁸ As a preliminary point, USCIS has not provided any data indicating that it has erroneously granted fee waivers based on inconsistencies as it suggests. Nevertheless, while it may be true that for certain means-tested benefit programs states use different income levels to grant awards, this is certainly not true for all programs. Some programs are much more uniform across the country like the Supplemental Nutrition Assistance Program (SNAP). This is because federal rules set the eligibility requirements.⁹</p> <p>Taking receipt of SNAP as an example, it is not readily apparent that USCIS' s proposal would produce more consistency or predictability. Eliminating from consideration an applicant's receipt of SNAP eliminates a critical piece of evidence that demonstrates to the USCIS adjudicator on either a yes-or-no basis whether the individual applicant has demonstrated an inability to pay. Under the current rule, two applicants submitting fee waiver applications based on the receipt of SNAP benefits would receive the same determination as to eligibility for the fee waiver based on the same single document. But, under the proposed rule, the same two applicants might receive different determinations simply because different officers came to different conclusions after reviewing all the additional documentary evidence that applicants would have to provide. This inconsistency and unpredictability could result in applications being erroneously denied, which jeopardizes the integrity of a system designed to aid, not harm, applicants. And erroneous denials further increase costs when applicants are forced to resubmit fee waiver applications.</p> <p>Again, the standard for granting a fee waiver is not whether an applicant has received a meanstested benefit; it is whether the applicant has demonstrated an inability to pay. USCIS's proposal suggests that receipt of a means-tested benefit is the sole criterion for eligibility of the fee waiver, but this is simply not the case. Receipt of a means-tested benefit is only one efficient</p> <p>way of determining whether an individual has demonstrated an inability to pay. USCIS's</p>

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1397	USCIS-2010-0008-1152	Hieu Nguyen, Korean Women's Association	<p>Comment part 2: This proposal would reduce efficiency. Instead of requiring less evidence from applicants, as its Federal Register announcement suggests, USCIS would force these individuals to collect, and adjudicators to analyze, many more records. It's easy to determine whether an applicant receives a means-tested benefit by simply reviewing government documentation. However, assessing an individual's income or financial hardship is a more open-ended inquiry. A single document often cannot answer it, especially for people who aren't required to file taxes, or people whose income or family status has changed since they filed taxes. This proposal would therefore not simplify the evidence required for fee waiver adjudication, but instead multiply it exponentially.</p> <p>Receipt of a means-tested benefit is a straightforward, efficient standard because it makes use of the income verification process that local and state benefits agencies have already conducted, instead of requiring federal adjudicators to repeat it. Preventing USCIS employees from relying on their state and local counterparts competent work is a waste of resources.</p>

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1414	USCIS-2010-0008-1175	Wendy Cervantes, Center for Law and Social Policy	<p>Comment part 3: III. The proposed rule relies on the faulty premise that individuals who receive a means-tested benefit have the resources available to pay immigration fees.</p> <p>Under the proposal USCIS states that it “has found that the various income levels used in states to grant meanstested benefit result in inconsistent income levels being used to determine the eligibility for a fee waiver. Therefore, the revised form will not permit a fee waiver based on receipt of a means-tested benefit, but will retain the poverty-guideline threshold and financial hardship criteria.” This change would result in elimination of the 2011 policy guidelines, PM-5602-011.1.</p> <p>Means tested benefits are a simple, clear form of proof to document financial hardship and that an applicant does not have disposable income to pay immigration fees. USCIS appears to be willfully ignoring that receiving meanstested benefits demonstrates an individual’s financial need, the very reason that the fee waiver process was created. Forcing applicants to recreate the means-tested benefit criteria through other evidence is burdensome and will discourage many clients from pursuing the relief Congress intended for them. We believe it is critically important that the 2011 guidelines be maintained because they recognize the importance of using various mechanisms to determine financial hardship and the need to allow flexibility on a case-by-case basis. Allowing receipt of means-tested benefit to qualify for a fee waiver is also in line with state and local policies which set income guidelines for means tested benefits based on regional and local costs of living.⁸ The proposed rule would create a national poverty-guideline threshold that ignores the lived reality of low-income immigrants, who are dispersed throughout the country, including large concentrations in high-cost counties like Los Angeles and San Francisco.⁹ The Interagency Technical Working Group on Developing a Supplemental Poverty Measure (SPM) found that a more accurate poverty measure would incorporate regional variations in the cost of living, and this recommendation has been incorporated into the Census Bureau’s SPM.¹⁰ Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility again for the purpose of immigration benefits.</p> <p>The rule assumes that individuals who have received means-tested benefits are able to pay for the fee and have received waivers erroneously. Yet, USCIS fails to provide any evidence that accepting proof of receipt of a meanstested benefit has led to individuals receiving fees whom they were able to pay. By removing the receipt of</p>

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1457	USCIS-2010-0008-1226	Michelle Seyler, Central American Resource Center - Los Angeles	<p>Comment part 3: C. Means-tested benefits should be sufficient evidence that an applicant qualifies for a fee waiver</p> <p>The proposed changes also eliminate the use of means-tested benefits to establish eligibility for the fee waiver. In accordance with 8 C.F.R. § 103.7(c), applicants can retain proof of their receipt of means-tested benefits to prove their eligibility. USCIS contends that states have different requirements for determining whether an individual qualifies for means-tested benefits. However, USCIS has not provided any evidence that they have wrongly granted a fee waiver to applicants who do not qualify for one.</p> <p>Additionally, if an applicant receives government benefits, they have already gone through a screening process to establish that they are living below the federal poverty guidelines. In doing so, they have already demonstrated their eligibility for a fee waiver from USCIS. They should not be required to do so again in order to access relief and benefits that can empower them and improve their lives.</p>

ID	Comment.	Commentor	Comment
1183	USCIS-2010-0008-0763	Patti Seger on behalf of End Domestic Abuse Wisconsin, the Wisconsin Coalition Against Domestic Violence (End Abuse)	<p>Comment part 3: B. This proposal will place a time and resource burden on individuals applying for fee waivers. By only accepting fee waiver requests submitted using the Form I-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests that are not submitted on Form I-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit the Form I-912, when a self-generated request that provides all of the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit their own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested, including an Internal Revenue Service (IRS) transcript, documentation showing they are not required to file federal taxes, and verification of the non-filing from the IRS to list a few. This increases the burden on the applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility as applicants have already proven current receipt of benefits by providing a copy of the official eligibility letter, or Notice of Action, from the government agency administering the benefit. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested benefit as a way to show eligibility, the government is adding an additional burden on immigrants who already are facing the economic challenge of paying for application fees. Fourth, under the proposed changes, the applicant must procure additional new documents including a federal tax transcript from the Internal Revenue Service (IRS) to demonstrate household income at less than or equal to 150% of the federal poverty guidelines. Currently, applicants can submit a copy of their most recent federal tax returns to meet this requirement. The government does not provide any reason as to why a transcript is preferred over a federal tax return. Federal tax returns are uniform documents and most individuals keep copies on hand. The proposed requirement will place an additional burden on individuals for more documents and does not account for those individuals who might need assistance obtaining a transcript due to lack of access to a computer or for delays involving delivery of mail. Filling out Form I-912 and proving annual income, resources, and expenses is a time consuming and burdensome process, much more so than demonstrating receipt of means-tested benefit. Many applicants need more than one appointment to have the necessary information and documentation to properly fill out the form. Many</p>
860	USCIS-2010-0008-0777	Ava Penman	<p>I oppose this proposal. USCIS efficiency will not be increased. The reverse will happen.</p> <p>If enacted the proposal would prevent low-income applicants from using benefits such as Medicaid, Food Stamps, Public Housing...as a basis for a fee waiver. It would prevent thousands of eligible applicants from become U.S. citizens.</p> <p>PLEASE DO NOT GO FORWARD WITH THIS PROPOSAL.</p> <p>Thank you for your attention to this comment.</p>

ID	Comment.	Commentor	Comment
1484	USCIS-2010-0008-1237	Jorge Baron on behalf of Northwest Immigrant Rights Project (NWIRP)	<p>Comment part 5: IV. The rationale for the proposed changes to the fee waiver criteria are unfounded and inconsistent with the relevant regulatory provisions</p> <p>One of the most problematic changes envisioned by the proposed regulatory action is the elimination of the option of showing that the applicant receives a means-tested benefit as an avenue to qualify for a fee waiver. USCIS’s rationale for this change is that “USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver.” However, NWIRP submits that the claimed inconsistency regarding income levels may be reflecting a more consistent standard in relation to the regulatory standard of ability to pay.</p> <p>Specifically, the relevant regulation provides that the criteria for qualifying for a fee waiver is that the party requesting the immigration benefit show that they are “unable to pay the prescribed fee.” 8 C.F.R. § 103.7(c)(1)(i). This inability to pay is not tied to a particular income level but to the actual situation of the individual in being able to demonstrate insufficient discretionary income to be able to pay the required fee. And this in turn is dependent on the cost of living in the particular state and region in which the applicant resides. The federal government itself recognizes the differences in costs in various regions in a number of ways, such as the Census Bureau’s Cost of Living Index for Selected Urban Areas. The fact that states set different criteria for their means-tested benefits simply acknowledges the fact that there are different economic situations in various states and that what might be a level of income that is sufficient in one location is insufficient in another. In other words, the option of using the receipt of means-tested benefits as an option is likely to lead to more consistent adjudication under the actual regulatory criteria of inability to pay the fee. And, conversely, the elimination of that option as proposed by DHS will actually result in more inconsistent adjudications of that criteria. For all of the reasons articulated above, NWIRP strongly objects to the proposed regulation and urges</p> <p>DHS and USCIS to reject this proposal. The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and eventually as that they can participate fully in American life and be</p>

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52	USCIS-2010-0008-0194	Alexandra Olins	<p>I am strongly against the proposed revision to the I-912 fee waiver form. This is because the proposed revision would be bad public policy and a waste of tax payer money.</p> <p>When an individual qualifies for a means-tested public benefit in their home state, their income has been fully verified prior to them ever receiving their means-tested benefit. The work of one government-funded agency has already been done, and the individual has been shown to be low-income. There are no errors in this calculation or process. As a U.S. citizen, I do not think tax-payer funds should be expended AGAIN at the federal level for USCIS to re-verify this person's income with an additional, duplicative, separate income calculation process. There is no need to verify this person's income with a second, redundant process. This is bad public policy and a waste of public resources at USCIS. Surely there are other things that USCIS staff could work on that would be of greater interest to the public good? The current system for determining eligibility for the fee waiver is working just fine. There is no need to fix it.</p>

ID	Comment.	Commentor	Comment
69	USCIS-2010-0008-0220	JOANNE FOSTER	<p>A major concern with the proposed rule is that it would be an enormous, unconscionable waste of vast government resources.</p> <p>As now adopted, the fee waiver process is most economically accomplished through evidence of the existence of means-tested benefits (food assistance, Medicaid, etc.). In these cases, low income eligibility has been thoroughly investigated and determined by state and other local agencies, often pursuant to stringent federal regulations and OFTEN USING FEDERAL RESOURCES.</p> <p>Under the proposed rule, existing valid and current income determinations would be ignored and there would be unnecessary and costly duplication by the federal government of existing processes to determine low income eligibility.</p> <p>Thank you for your consideration of these comments and for safeguarding precious federal resources.</p>
88	USCIS-2010-0008-0237	Emily Eaker	<p>I am a caseworker at World Relief Seattle, and I work daily with newly arrived refugees and asylees to the country. I do NOT support a change to the USCIS fee waiver policy. This disadvantages low income clients, the elderly and the disabled. Some of these folks will have an extra burden of proving they didnt need to file taxes, and this is unjust. This is also redundant; if someone already qualifies for benefits that are means-tested, they have already proven that they have financial need.</p>
445	USCIS-2010-0008-0578	Beth Charpentier	<p>I strongly oppose this regulation. It's creating a redundancy of work at the federal level that has already been completed at the state level. It's a waste of staff time and taxpayer money.</p>

ID	Comment.	Commentor	Comment
536	USCIS-2010-0008-0716	Anne Harrison	I am strongly against the change to the fee waiver eligibility process. It is a solution in search of a problem. As a student of public policy, we were taught that any change to a given policy should be in response to a specific problem and/or should save money or make a current process or procedure more efficient. This proposed change would do none of these things. There is nothing wrong with the current system. It works well, but perhaps that is the problem? The current system is efficient for immigrants & USCIS alike. Eligible immigrants can easily get a benefit letter from their home state. USCIS officers can easily verify the benefit letter. The system is simple, efficient, and working as it should. Why would anyone want to change that?

ID	Comment.	Commentor	Comment
639	USCIS-2010-0008-0873	Alexander Voisine	<p>Having worked extensively with immigrants applying for U.S. citizenship, I am well aware of the fee waiver process, as well as the circumstances from which many eligible legal permanent residents come from. The ability to list food stamps, public housing, or Medicaid as evidence for a fee waiver makes the citizenship application process more accessible and more efficient for applicants-- for those I've worked with that needed to submit pay stubs, it generally took much longer, and those who find themselves in precarious work situations are often unable to submit regular pay stubs. Those who had to submit tax returns also faced a similar situation, and many didn't know where their tax stubs were. Food stamps, Medicaid, and public housing enrollment forms were by far the easiest documents for my clients to access, which in turn made their citizenship application process easier and less lengthy. It goes without being said that legal, permanent residents applying for citizenship benefits all Americans, and we should do everything we can to encourage more people to apply for citizenship.</p> <p>In summary, my three main reasons for opposing the proposed fee waiver requirements are as follows:</p> <p>1.) The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect, as pay stubs and tax forms are relatively more difficult to access for those applying for citizenship, from my experiences.</p> <p>2.) Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p> <p>3.)The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p>

ID	Comment.	Commentor	Comment
731	USCIS-2010-0008-0813	Linda Wilson	<p>I strongly oppose the USCIS proposal to stop accepting receipt of a means-tested benefit such as Medicaid as evidence that a person qualifies for an application fee waiver. The current standard is simple, reliable, and cost-effective. In contrast, the proposed change published at 83 Fed. Reg. 49120 on Sept. 28, 2018 is unjustified, complex, and counterproductive. It would increase burdens on adjudicators, government agencies, applicants and community-based organizations that support them. It would reduce naturalization rates and cause all Americans to lose the economic and social benefits of naturalization.</p> <p>The proposal is unjustified because USCIS has presented no evidence of erroneous approvals under the current process, and no financial justification exists for such a change. Administration of means-tested benefits programs has not changed. The proposal will burden all stakeholders in the application process. USCIS will waste resources in duplicative efforts if it adopts the proposal, and the proposed change would burden government agencies other than USCIS. The proposal will prevent qualified legal permanent residents from naturalizing, and withdrawing the benefits of citizenship would hurt all Americans. Finally, the proposal would violate the duty of the USCIS as Members of Congress have repeatedly instructed USCIS to respect the importance of naturalization.</p> <p>I urge you to maintain the current fee waiver form and accompanying guidelines set forth in Policy Memorandum PM-602-0011.1, published March 13, 2011.</p> <p>Very truly yours,</p> <p>Linda K. Wilson, Esq.</p>

ID	Comment.	Commentor	Comment
765	USCIS-2010-0008-1114	Elizabeth Craig	The proposed change to the fee wavier eligibility process is a terrible idea. There is nothing wrong with the current process. Why would we want to fix something that is working well? Why would we want to ask USCIS officers to do the work of verifying income when that work has most likely already been done at the state level? The means-tested benefit letter is an efficient and effective way of determining household income, and it is done by trained government officials at the state level. USCIS officers are not trained in analyzing tax returns and determining household incomes. They are also busy with the very important work of adjudicating N-400 applications. Asking them to take on the additional work of verifying income for the fee waiver application at this time, when wait times to naturalize are at historic highs, makes NO sense. The fee wavier eligibility process is working very well as is. There is no need to change it. Doing so will cause additional wait times, confusion, and problems for clients who do not need to file taxes. Please withdraw this proposal. It makes no sense!
783	USCIS-2010-0008-1082	Mara Lim	As a tax payer, I strongly oppose this new policy as it is a waste of government resources as USCIS will have to verify income via tax returns. This new policy will negatively impact the lowest income families who are not required to file tax returns. They should continue to have the option of the currently accepted method of verifying income for fee waiver.

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888	USCIS-2010-0008-0804	Submitted by Erin Riker, Center for Elder Law and Justice (CELJ)	<p>The Center for Elder Law and Justice ("CELJ") opposes USCIS proposal to end receipt of means-tested benefits (MTBs) as proof of entitlement to fee waivers for USCIS applications. This rule change will result in wasteful duplication of efforts on the part of the government, and could cause many applicants and petitioners to be unable to prove their entitlement to a fee waiver by any means. For these reasons, USCIS should abandon this proposed policy change and continue to accept receipt of MTBs as proof of entitlement to fee waivers.</p> <p>The processing fees for USCIS applications and forms represent an insurmountable burden for many refugee and immigrant families. Currently, the application fee for the N400 Application for Naturalization alone is \$640, exclusive of the \$85 biometrics fee added to most N400 applications. Recognizing this burden, USCIS has long offered applicants the opportunity to apply for a fee waiver by proving their financial hardship. Traditionally, applicants have had different options by which they can prove hardship. Applicants can provide proof of income at or below 150% of the Federal Poverty Level (FPL) in the form of annual tax returns. Applicants can also provide proof of receipt of government MTBs, such as food stamps, Medicaid, or certain forms of cash assistance, provided that said benefit is currently being received at the time the application is being processed.</p> <p>Proof of receipt of government MTBs is an incredibly popular option for refugees and immigrants seeking fee waivers. However, USCIS recent proposal seeks to limit an applicants method of proof to income level alone, rather than by current receipt of MBTs. USCIS justification for this change is the claim that immigrants can game the system by providing proof that they received MTBs at one point or another, even if their financial circumstances arent dire enough to warrant receipt of MTBs at the time of the application.</p> <p>This justification is based on flawed logic. One condition of the MTB method of proving entitlement to a fee waiver is that the MTB proof (usually in the form of an award letter from the local, state, or federal agency administering the MTB) must state both the date on which the applicant was most recently certified or recertified for the benefit, and the date on which the benefit expires or must be renewed. This is stated very plainly on the application for fee waiver and in the accompanying instructions. In cases in which an applicants MTB is set to expire or be renewed near the time of the application, this office routinely sees fee waiver applications denied or returned for additional proof if the application is not reviewed until after the end date of the MTB. Thus, it is already impossible for applicants to obtain a fee waiver through proof of receipt of MTBs unless said proof is also current.</p> <p>The proposed rule change will also result in wasteful duplication of efforts on the part of the government. When individuals and families apply for MTBs, they are carefully screened at the local, state, or federal level (depending on the benefit sought) for income and resources. Thus, the government has already determined them to be suffering financial hardships before they even apply for USCIS-based benefits. If applicants are no longer able to use proof of receipt of MTBs as proof of hardship, this will result in USCIS having to individually screen each and every applicants income in duplication of efforts already undertaken by other government agencies. At a time when USCIS application processing backlog is already reaching crisis proportions, this wasted effort is unnecessary and detrimental to the functioning of USCIS.</p>

ID	Comment.	Commentor	Comment
1005	USCIS-2010-0008-1102	Samantha Morton, MLPB	<p>Dear Ms. Deshommes:</p> <p>MLPB thanks the United States Citizenship and Immigration Services (the “Agency”) for the opportunity to comment on the Agency’s Proposed Change to Form I-912, Request for Fee Waiver (hereinafter the “Proposed Change”). The existing Form I-912 includes eligibility for applicants who meet one of three criteria: receipt of a means-tested benefit, low income, or financial hardship. The Proposed Change would eliminate receipt of a means-tested benefit as a category of eligibility for a fee waiver, requiring all applicants to go through the more time-consuming and complicated process of proving either low income or financial hardship.</p> <p>MLPB is a non-profit social enterprise that equips healthcare and human service workforces with upstream problem-solving strategies that improve people’s negative social determinants of health. Leveraging our public interest law expertise, we advance health equity for individuals, families, and communities. Because we support care teams to better serve their patients/clients, our work benefits immigrant populations alongside citizen populations. Unstable immigration status is a negative social determinant of health – including for U.S. citizens in mixed-status families – which means we frequently make referrals to organizations that help immigrants of all types.</p> <p>While streamlining immigration procedures is a valuable goal, the rule as proposed would increase the Agency’s investment of time and effort, because it would need to duplicate work done by other agencies. No goal is served by re-testing applicants who have already met eligibility criteria for a means-tested public benefit when the Agency can simply confirm that the agency administering that specific benefit uses a relevant means-testing standard. If the Agency insists on re-testing every applicant who receives means-tested public benefits, there inevitably will be one of two foreseeable negative consequences. Families who choose to pay the fee without seeking a waiver will forego purchasing food, medicine, or heat, and these deprivations predictably will pass on costs to healthcare and other social service budgets. Alternatively, people who have earned the privilege of applying for status simply will not pursue it, resulting in costs not only for them as individuals but also for their mixed-status families. Removing fee-waiver eligibility via approval for means tested public benefits programs will also have a disparate negative impact on elders and applicants with disabilities, who disproportionately meet essential needs through these programs. While these individuals have vulnerabilities, they also bring strengths to their families and households – their courage in migrating to the U.S. is an inspiration to younger members of their families whose potential to thrive and contribute to our country is enriched by the well-being of their elders. This part of today’s immigrant family history is something many American families (with the oft-forgotten exceptions of those descended from Native Americans and from enslaved Africans) have in common when we look back far enough in our family history. Further, young people’s potential is enriched when their family’s scarce income is safeguarded for their social determinants of good health such as food and housing security.</p> <p>No goal consistent with American values and Agency mission can be served by deterring eligible legal permanent residents from applying to naturalize. The fee waiver system was created to ensure access to immigration benefits for those applicants who do not themselves have the means to pay the fees. The Proposed Change will undermine the fee waiver system entirely and erode the Agency’s stated goal of “efficient and fair adjudication requests for immigration benefits” because it will</p>

ID	Comment.	Commentor	Comment
1099	USCIS-2010-0008-1219	Comment Submitted by Claudia Castillo, Total as of 11/28/2018: 12	<p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>In calendar year 2017, almost 40 percent of citizenship applicants applied for a fee waiver, the majority of which were based on receipt of a means-tested benefit, meaning that the proposed rule has the potential to impact approximately 244,000 immigrants who have the opportunity to obtain citizenship and the right to receive fair and equal treatment from USCIS. Instead, the proposed rule would increase the overwhelming backlog of over 750,000 citizenship applications before the agency, extend waiting times for those applicants, which has already recently doubled, or worse, deter eligible immigrants from applying. This would prevent immigrants ability to integrate into the country, access higher economic and educational opportunities, and ultimately harms us all. It is for these reasons that I strongly oppose the proposed rule and call on DHS to withdraw it.</p>

ID	Comment.	Commentor	Comment
1110	USCIS-2010-0008-1230	Ruth Kraut	<p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>I have personally seen how well the current waiver regulations are working, and the clients who are eligible for the waiver now are so joyful at their opportunity to become a citizen of the United States.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>In our community, immigrants are welcome, and they are great economic drivers. They contribute greatly to our community and in general, as citizens, they earn more and pay more taxes.</p> <p>I urge you to withdraw this rule.</p>

ID	Comment.	Commentor	Comment
1114	USCIS-2010-0008-1234	Courtney Carter	<p>Comment part 1: November 27 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Dear Ms. Deshommes:</p> <p>Our firm frequently represents survivors of domestic violence and other criminal activity here in the United States. Our U visa clients are among the lowest-earning and are the most vulnerable, aside from asylees.</p> <p>Thus, we strongly oppose the USCIS proposal to stop accepting receipt of a means-tested benefit such as Medicaid as evidence that a person qualifies for an application fee waiver. The current standard is simple, reliable, and cost-effective. In contrast, the proposed change—published at 83 Fed. Reg. 49120 on Sept. 28, 2018—is unjustified, complex, and counterproductive. It would increase burdens on adjudicators, government agencies, applicants and community-based organizations that support them. It would reduce naturalization rates and cause all Americans to lose the economic and social benefits of naturalization.</p> <p>In our experience, intimate partner violence, especially for immigrants, comports with studies cited by the Department of Justice and developed by the Center for Disease Control (CDC), 1 2 that indicate the strong relationship between intimate partner violence and economic, food, and housing insecurity. Abusers commonly prevent survivors from accessing or acquiring financial resources in order to maintain power and control in the relationship. In one study, 99% of domestic violence victims reported experiencing economic abuse. Of course,</p>

ID	Comment.	Commentor	Comment
1141	USCIS-2010-0008-0600	Claire Valentin, Children's Law Center of Massachusetts	<p>Comment part 4: Third, the Children’s Law Center opposes the proposed regulation because U.S.C.I.S. fails to advance a valid, meaningful justification for the revisions. The proposal advances only the following justification: “USCIS has found that the various income levels used in states to grant a means-tested benefit result in inconsistent income levels being used to determine eligibility for a fee waiver.” See Notice of Proposed Rulemaking, Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions, 83 FR 49120 (2018) at pg. 49121. The proposed rule has not detailed the extent of variation or how the variation negatively impacts the agency or the applicants. Furthermore, this justification fails to take into account the very different cost of living in different states. States are in a far better position than the federal government to determine income guidelines for means-tested benefits because states can take into account particularized information about the state’s economy and the costs of living in the state. As stated in the proposed rule, “[e]ach case [for a fee waiver] is unique and is considered on its own merits.” 83 FR 49120 (2018) at pg. 49121. Variations in income levels being used to determine eligibility for means-tested benefits among states does not conflict with U.S.C.I.S.’s case-by-case evaluation and rather, is likely to lead to a more accurate assessment of an individual’s ability to pay a fee. Should U.S.C.I.S. have a valid reason for eliminating state-based variations in income guidelines for means-tested benefits, U.S.C.I.S. could accomplish its stated objective far more easily and efficiently by simply requiring applicants to demonstrate that the means-tested benefit they are receiving meets a standardized federal income guideline.</p> <p>Finally, rather than minimize adjudicatory burden, the proposed revision would substantially increase the burden on U.S.C.I.S. by increasing the time and cost of reviewing fee waiver applications. Government agencies already carefully vet income information prior to granting means-tested benefits, meaning that individuals applying for fee waivers have already established to the satisfaction of governmental agencies that they meet the eligibility requirements for such benefits. The means-tested benefit criterion then functions to the</p>

ID	Comment.	Commentor	Comment
1218	USCIS-2010-0008-0738	Sarah Peterson, The Washington State Department of Social and Health Services (DSHS)	<p>Comment part 2: Eliminating evidence of receipt of means-tested benefits will also require DHS's U.S. Citizenship and Immigration Services (USCIS) officials to spend more time making income determinations for eligibility for the Form I-912. This is an ineffective and unnecessary use of taxpayer-funded resources. The advantage of USCIS accepting evidence of receipt of means-tested benefits is that state governments must already go through a comprehensive process of determining financial eligibility based on the FPL. State agencies, such as DSHS, have the technology, tools, and trained staff to effectively and efficiently assess someone's income and financial eligibility to administer federally-funded benefits. By using an automated system, DSHS is able to confirm and verify someone's income by matching it with data from the state's unemployment insurance wage information. In addition, the automated system utilizes key parameters, including family size, resources, and other critical information, to determine family income related to the FPL.</p> <p>Other federal agencies, such as the U.S. Departments of Health and Human Services (HHS) and Agriculture (USDA), already monitor these state systems for quality assurance to determine if states are accurately administering cash and food assistance programs based on income in relation to the FPL. For instance, the Supplement Nutrition Assistance Program (SNAP) provides food assistance to individuals and families whose gross income is generally below 130 percent of the FPL, and USDA tracks and monitors a state agency's enrollment in SNAP. Washington was proud to have an accuracy rate in 2017 that was actually higher than the national average in the SNAP program. With this level of quality assurance, it is critical to understand the value of accepting the letter from the state agency administering the means-tested benefits. By eliminating this form of verification, DHS is significantly reducing the quality of information being collected to verify eligibility for a Fee Waiver. This proposal significantly increases the amount of work required of USCIS officials. Under the proposal, USCIS will be required to sort through a variety of different documents to validate someone's income. This actually decreases the level of clarity of information, as each applicant may provide a variety of documentation. It also creates additional work that is unnecessary for federal officials. DHS estimates that the total annual hour burden associated with this collection is 409,650 hours, which accounts for the time to complete the application. DHS fails, however, to account for the additional hours that will be required by USCIS in processing these applications.</p>

ID	Comment.	Commentor	Comment
1288	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 6: Redetermining the income status of public benefits recipients is a waste of government resources. Clients receiving means-tested public benefits have already had their incomes verified by a state agency with expertise in local wages and cost of living—why does USCIS want to second-guess this determination? Our tax dollars pay local and state agencies to determine whether someone qualifies as low-income. USCIS is proposing to reconsider this determination, which would take up significant adjudication resources, and increase already-huge backlogs in processing immigration cases. USCIS will need additional resources to train officers in adjudicating the revised 1-912. USCIS staff will spend additional time repackaging and returning the rejected applications. For applicants committed to obtaining the fee waiver, USCIS may review and reject the 1-912 multiple times, incurring new postage fees each time.</p> <p>There is some variation among states in what constitutes income eligibility for a means-tested benefit. An individual living in Washington State might qualify for state benefits with a higher income than someone living in Mississippi. While the Federal Poverty Guidelines differ for residents of Alaska and Hawaii versus the contiguous 48 states, this does not reflect the fact that the cost of living varies greatly among the 48 states. An individual living in Washington who qualifies for food stamps may earn slightly more than someone in Mississippi getting food stamps, but the higher cost of living in Washington means that the Washington resident is similarly unable to afford the \$725 filing fee for the N-400. As opposed to the Federal Poverty Guidelines, an individual's eligibility for local benefits is a far better gauge of their ability to afford the filing fee.</p> <p>A study performed by the University of Washington School of Social Work examined the 'self-sufficiency standard', or the "amount needed to meet each basic need at a minimally adequate level, without public or private assistance." It provides an in-depth look at the costs borne by workers, including housing, food, childcare and transportation. The study found that a single parent with two children, a preschooler and a school-age child, living in Seattle, would need to earn \$33.37 per hour in a full-time job to be completely self-sufficient. Not surprisingly, the self-sufficiency standard was higher in Brooklyn (\$37.42) and San Francisco (\$37.71) and much lower in Atlanta (\$22.88) and Milwaukee (\$27.62). This</p>

ID	Comment.	Commentor	Comment
1394	USCIS-2010-0008-1086	Sandy Santana, Children's Rights	<p>Comment part 2: II: and provide documentation for one basis."6Here, USCIS proposes to remove the first basis, which requires the least amount of documentation and requires USCIS to do the least amount of analysis. The other criteria require USCIS to consider an applicant's federal tax forms or evidence of an applicant's ability to pay like "monthly bills and payments," "medical bills," and "extenuating circumstances."7It is certainly true that the proposal would reduce the type of evidence considered for purposes of Form 1-912 in this very specific respect; however, it will not reduce the amount of evidence in the fee waiver process generally—in fact, it will likely increase the amount of evidence that USCIS must consider. And this resulting increase in evidence will likely translate to increased costs associated with adjudicating fee waiver applications.</p> <p>USCIS instituted Form 1-912 to streamline the fee waiver application process and consolidate all the types of evidence necessary to demonstrate eligibility for a fee waiver. Drawing on previous factors USCIS considered, receipt of a means-tested benefit was viewed as an efficient primary consideration to determine eligibility. Indeed, USCIS has considered this factor since as far back as 2004. This is because it is a simple yes-or-no criteria that provides an effective sorting mechanism for applications at the outset—cutting down on the cost of sorting through applications laden with documents. It also enables USCIS to piggyback on the work of other government agencies that have already reviewed the evidence and have concluded that the individual suffers from financial hardship. Much of this work (expended by other government agencies) already entailed considering the same evidence that USCIS will now be required to reconsider, leading to an increase in costs for the application process as a whole. After all, the standard for receipt of a fee waiver is whether the individual has demonstrated an inability to pay, not whether or not the individual has received a means-tested benefit. Receipt of a meanstested benefit is just one efficient proxy towards this end.</p> <p>Therefore, removing receipt of a means-tested benefit from the eligibility criteria under Form I912 only removes a long-standing, streamlined process that has enabled USCIS to capitalize on</p>

ID	Comment.	Commentor	Comment
1411	USCIS-2010-0008-1171	Laura Armstrong on behalf of La Casa Hogar	<p>Comment part 3: This proposal would reduce efficiency. As described above, it would significantly reduce efficiency and increase costs for La Casa Hogar; however, it would also do the same for USCIS. Instead of requiring less evidence from applicants, as the Federal Register announcement suggests, USCIS adjudicators would need to analyze many more records and documents per case. This change would replace the quick method of simply reviewing government documentation to confirm receipt of a means-tested benefit, with a more intensive analysis of an individual's income or financial hardship. A single document often cannot prove this, especially for people who aren't required to file taxes, or people whose income or family status has changed since they filed taxes. This proposal would not simplify the process for fee waiver adjudication, but instead multiply it exponentially—for the service provider, the applicant, and the adjudicator.</p> <p>Receipt of a means-tested benefit is a straightforward, efficient standard because it makes use of the income verification process that local and state benefits agencies have already conducted (which American taxpayer dollars have already paid for), instead of requiring federal adjudicators to repeat it. Preventing USCIS employees from relying on their state and local counterparts' competent work would be a poor use of resources.</p>

ID	Comment.	Commentor	Comment
897	USCIS-2010-0008-0835	Evangeline Chan	<p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121.</p> <p>DHS proposes to revise the eligibility requirements for a Request for Fee Waiver (Form I-912) by eliminating means-tested benefit as a basis for a fee waiver request and retaining only the poverty-guideline threshold and financial hardship criteria.</p> <p>I strongly oppose the U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS) proposed changes to the fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>First, contrary to the asserted goal of simplifying procedures and reducing paperwork, taking away the means-tested benefits qualification for fee waivers will actually create a significant additional burden for immigrant communities, federal agencies, and service providers. Currently, submitting a copy of the official eligibility letter from the government agency administering the means-tested benefit is the most simple and straightforward way to demonstrate fee waiver eligibility because such letters are the most easily accessible. By eliminating this qualification and requiring that applicants submit proof of income and other financial hardship, USCIS is creating additional time and resource burdens on not just immigrants and their families, but on service providers that assist with these applications and ultimately, on the agencies that must adjudicate these applications. The volume and complexity of the paperwork required for fee waivers will only further delay the adjudication of these requests as well as the underlying applications, straining an already over-burdened and severely backlogged USCIS system.</p> <p>Second, denying means-tested benefit fee waivers and only accepting income-based fee waivers will hurt immigrants who are unemployed, underemployed, unable to work, or retired. Many immigrants whose incomes fall below a certain threshold are not required to file taxes. Finding adequate paperwork to prove their need is has proven extremely difficult, as many fee waiver requests filed on the basis of the income threshold or financial hardship have recently been rejected or denied for inadequate documentation.</p> <p>Third, the proposed rule would harm the most vulnerable populations, including survivors of domestic violence, sexual assault, human trafficking, and other crimes. Many survivors depend on critical benefits to survive. As a result of the crime(s) inflicted upon them and the trauma many now still suffer, many survivors have been or are unable to work and thus, unable to meet the stricter evidentiary requirements proposed to prove eligibility for a fee waiver. By eliminating the means-tested benefit eligibility for fee waivers, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice. Fee waivers are critical to ensuring survivors can access relief.</p> <p>Finally, the significant additional burden created by this proposed change will deter many otherwise qualified immigrants from applying for green cards, citizenship, and other immigration benefits, including something as necessary and critical as a replacement for a lost or stolen green card.</p> <p>For the foregoing reasons, I strongly urge this Administration to immediately withdraw this rule.</p>

ID	Comment.	Commentor	Comment
913	USCIS-2010-0008-0921	Meghan Kelly- Stallings	<p>Submitted via www.regulations.gov OMB Control Number 1615-0116 USCIS-2010-0008</p> <p>I write this comment in opposition of the proposed rule to revise the Form I-912 by eliminating the option of using an individual's receipt of a means-tested public benefit as a basis for fee waiver eligibility.</p> <p>I am a Seattle-based immigration attorney, formerly in private practice, who currently represents clients pro bono in applications for U Visas and asylum. I often use the Form I-912 to accompany Form I-765 Applications for Employment Authorization. In these submissions, I typically show my clients' eligibility based on their receipt of public benefits. For clients who receive public benefits, submitting a public benefits letter is by far the most straightforward way to demonstrate fee waiver eligibility. Many lowincome clients are not required to file taxes, and as such, filing an income-based fee waiver is likely to fail without the strongly preferred documentation of income. Without tax returns, and in many cases, pay stubs, it is almost impossible to show one's lack of income and eligibility under the poverty guidelines. The hardship basis of fee waiver eligibility is poorly defined, and in my 15 years in immigration law (as both a paralegal and attorney), I've never had a hardship-based request approved—a predictable outcome since no one really knows what type of evidence USCIS is seeking to demonstrate financial hardship.</p> <p>I'm not sure what this rule change is intended to achieve. It will create unnecessary obstacles for those who need assistance the most, and I do not see any upside for the federal government. The fee waiver is not available for most USCIS application types, and USCIS has decided it's in the public interest to allow fee waivers for certain application types, including the I-765 and N-400, Application for Naturalization. By making it harder for people to file I-765s and N-400s, and accordingly receive work permits and US citizenship, it effectively makes it harder for individuals to gain access to lawful employment or achieve the civic integration and economic boost associated with becoming a US citizen.</p> <p>Is this what USCIS wants to achieve?</p>

ID	Comment.	Commentor	Comment
771	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 1: RE: DHS DOCKET No. USCIS-2010-0008, Application for T Nonimmigrant Status Form I-914; OMB Number 1615-0116, Document Number 2018-21101; Document Citation 83 FR 49120</p> <p>Dear Ms. Deshommes:</p> <p>I am writing to submit the Coalition to Abolish Slavery and Trafficking's (CAST) comments to DHS DOCKET ID USCIS-2010-0008, Request for Fee Waiver exemption; OMB Control Number 1615-0116, Document Number 2018-21101.</p> <p>Founded in 1998 in Los Angeles, California, CAST was one of the first organizations in the United States to provide comprehensive social and legal services for survivors of human trafficking. Additionally, CAST opened the first shelter in the country exclusively dedicated to providing physically and psychologically safe housing for survivors. CAST serves male, female, and minor victims of trafficking. CAST clients come from almost every region of the world including Asia, Latin America, Eastern Europe, Africa and the United States. To date, CAST has provided services to over 1,000 survivors and their family members, as well as thousands of hours of technical consultation to organizations working on this issue across the country and internationally, especially related to filing T-visas and other humanitarian immigration relief for victims of human trafficking. Our daily experience providing legal and social services to survivors gives us critical information about the real-life experiences of trafficking victims and how the proposed changes for fee waiver request will impact victims from equitably and efficiently accessing the immigration relief that they are legally entitled to obtain.</p> <p>First, we would like to thank DHS for the opportunity for the public to comment on the proposed changes to the proposed changes to the fee waiver request for immigration applications. CAST has provided additional information in the public comments below from the experiences of survivors of human trafficking and practitioners to better support DHS to carry out the congressional intent to protect and serve victims of severe form of trafficking in persons and their immediate family members. The comments below are based on our direct experiences providing direct legal representation and providing national technical assistance to advocates assisting their clients file T visa applications and other forms of humanitarian immigration relief for victims and our understanding of congressional intent behind the enactment of the Trafficking Victims Protection Act (TVPA) of 2000 and its subsequent 4 authorizations.</p> <p>Removal of Means-Tested Benefit Evidence</p> <p>We strongly oppose USCIS's proposal to terminate the submission of a means-tested benefit as sufficient evidence to demonstrate an applicant's inability to pay the immigration application fee and need for a fee waiver. The current means-tested benefit standard is simple, reliable, and cost-effective. In contrast, the proposed change, published at 83 Fed. Reg. 49120 on Sept. 28, 2018, is complex and counterproductive. CAST recommends to maintain the means-tested benefit as well as the fee waiver guidelines as established by Policy Memorandum, PM-602-0011.1. CAST believes the continuation of the currently implemented 2011 fee waiver guidelines will: (1) promote consistent adjudication of fee waiver requests, (2) increase efficiency and lessen the burden on USCIS to conduct lengthy adjudications of fee waiver requests, and (3) efficiently implement the congressional intent to provide expedited access to humanitarian immigration relief to victims of human trafficking and</p>

ID	Comment.	Commentor	Comment
941	USCIS-2010-0008-1011	Lara Nations	<p>I strongly oppose the proposed changes to fee waiver requests. This rule change will make it significantly more difficult for some of the most vulnerable members of our society to apply for immigration benefits for which they are eligible. Requiring applicants to provide proof other than a letter from the state or local agency administering means-tested benefits is a huge obstacle. Regardless of what state an applicant may live in, immigrants who are on public assistance are struggling to make ends meet and cannot affording the escalating application fees. Proof that they receive a means-tested benefit should be sufficient for purposes of fee waiver requests.</p> <p>This rule change will have a particularly large impact on the ability of immigrants to naturalize. U.S. citizenship is a very important part of integrating immigrants into our society. Naturalization should be available to all eligible immigrants, not just those who are wealthy enough to afford the filing fee.</p> <p>Other immigrants who frequently request fee waivers are those who are most marginalized and vulnerable, such as victims of domestic violence, severe forms of human trafficking, and other crimes. The U.S. government should be encouraging crime victims to come forward to report the crimes of which they are victims. If immigrants fear that they will be deported, they are significantly less likely to come forward when they are victimized. If they cannot access immigration benefits for crime victims because of filing fees, they are significantly less likely to report the crimes against them. That will make a safer society for everyone who lives in the United States.</p> <p>I urge the agency not to make this rule change and to keep allowing immigrants to apply for fee waivers upon a showing that they receive means-tested benefits.</p>

ID	Comment.	Commentor	Comment
1278	USCIS-2010-0008-1023	Iris Gomez, Massachusetts Law Reform Institute (MLRI)	<p>Comment part 2: Eliminating fee waiver eligibility based on receipt of a means-tested benefit will negatively impact economically disadvantaged persons; reduce the quality, consistency, and efficiency of fee waiver adjudications; increase costs for the legal services community and the agency; and reduce opportunities for low-income people to improve their economic circumstances by obtaining EADs and improved legal status.</p> <p>The new proposal restricts waivers to applicants who are at or below 150 percent of the federal poverty threshold or financial hardship, rather than the 3-part option currently in use of evaluating either: receipt of a means-tested benefit, or income below 150% of federal poverty guidelines, or other financial hardship. Narrowing criteria as to who may qualify for a fee waiver when applying for an immigration benefit will undoubtedly restrict the legalization of many qualifying individuals. Means-tested benefits, whether federal or state, are only available to people whose incomes have been determined to be below a certain threshold. For example, many of the common benefits, such as SNAP benefits/food stamps, and Temporary Assistance for Needy Families (TANF)), even in states with the least stringent income tests, set the maximum qualifying income level at less than 150% of the federal poverty level. Therefore, applicants receiving those benefits necessarily already have demonstrated a low income, thus satisfying the standard that this would require for income-based fee waivers. While proof of receipt of a means-tested benefit evinces a broader financial status determination than mere income, as local and state adjudicators generally review various measures and records, accepting receipt of these benefits facilitates USCIS' adjudication of the merits of a fee waiver application because it relies on another government agency's assessment based on a fuller and therefore more accurate picture of the immigrant's economic ability to pay the fee for which the waiver is sought.</p> <p>Removing the means-tested benefit basis for proof of need for a fee waiver leaves the two remaining alternatives, which are more labor and document intensive and needlessly require the applicants, nonprofits helping them, and the agency to re-prove financial facts that have already been vetted and determined by another government agency. Requiring applicants to go through such a lengthy and difficult process to re-document that they are low-income will likely decrease the number of fee waivers granted as well as the number of underlying immigration benefit applications that can be filed by immigrants who cannot afford to pay the high fees that are typical with immigration benefits.</p> <p>Income-based fee waivers are onerous. That is one reason that state courts in Massachusetts rely on receipt of means-tested benefits as a measure of indigency when waiving court fees.¹ And even with a mean-tested benefit, there are often USCIS requests for evidence and denials. Having to submit a more extensive package of proof to demonstrate that a fee waiver applicant has income at or below 150 percent of the Federal Poverty Guidelines will require many documents that are difficult for low-income people to obtain or not obtainable at all. For example, having to demonstrate the monthly income for every member of his or her household, and to provide tax returns for the prior year, four weeks of pay stubs, or proof of when the applicant or household member became unemployed already is challenging.² For families with income so low that they are not paying taxes – such as recently arrived refugees, or asylees or victims applying under the Victims Against Violence Act, or U-visa crime victims or trafficking victims - proof of a prior year tax return will be impossible. Such applicants then would need to provide pay stubs – which for a</p>

ID	Comment.	Commentor	Comment
1309	USCIS-2010-0008-0926	Eli Cohen, New York City Bar Associations Immigration and Nationality Law Committee	<p>Comment Part 3: b. The Proposed Rule Disproportionately Impacts Vulnerable Categories of Immigrants: Applicants/Beneficiaries of Humanitarian Relief and Low-Wage Workers</p> <p>Reducing the paths available to obtain a fee waiver is particularly concerning because these waivers are commonly used by specific groups of vulnerable immigrants as well as longtime legal residents among the working poor who are eligible for public benefits in limited circumstances.</p> <p>Humanitarian applications to USCIS are generally fee-exempt or waivable, and collateral applications for these individuals such as employment authorization, adjustment to lawful permanent resident status, and waiver of any of the grounds of inadmissibility⁷ typically allow for fee waivers.⁸ In particular, the Proposed Rule will affect applicants who have won or are seeking asylum, U nonimmigrant status, T nonimmigrant status, Violence Against Women Act self-petitions, Temporary Protected Status, or Special Immigrant Juvenile Status and who may legally qualify for means-tested benefits.⁹ Among the people most in need of fee waivers who also may qualify for means-tested benefits are children, victims of crime, survivors of human trafficking, and certain people fleeing persecution, natural disasters, and armed conflict.¹⁰</p> <p>Congress prescribed eligibility for federal means-tested benefits for many humanitarian immigrants recognizing that they are vulnerable and may need help to establish a foothold in the U.S., including through supplements to their income in the form of government benefits. Unlike other categories of immigrants, these groups often have access to means-tested benefits and are purposefully exempt as a matter of statute from the public charge ground of inadmissibility. Thus, the Proposed Rule would most negatively impact the very groups of immigrants Congress sought to protect.</p> <p>Low-wage workers will also likely be disproportionately affected. Congress retained eligibility for government benefits for long-term, low-wage workers so they are more likely to receive means-tested benefits which, in turn, could provide a basis for obtaining a fee-waiver. Like humanitarian entrants, they are not generally subject to public charge rules. Although many people in the United States use means-tested benefits to supplement work income, only low-wage workers are eligible, and there are overall income caps such that eligibility for the benefits is a fair proxy for fee waiver eligibility.</p> <p>Although these individuals could still seek fee waivers under the Proposed Rule, it would become increasingly difficult for them to do so with the elimination of means-tested benefits as a way of demonstrating eligibility.</p> <p>Finally, the City Bar is concerned that the Proposed Rule could disproportionately affect immigrants based on their race or nationality. Research suggests that income-related barriers most heavily affect immigrants from Asia, Latin America, and Africa, while immigrants from Europe, Canada, and Oceania are the least affected.¹¹ For example, when the United States previously increased fees for naturalization, the share of Mexican lawful permanent residents who applied for naturalization dropped from 19.8 percent in 2008 to 12.7 percent in 2010.¹² Immigration policies that only benefit wealthy applicants of certain races are inconsistent with the United States' commitments to equality and humanitarian protection.</p> <p>A likely result of the Proposed Rule will be that vulnerable immigrants will simply forgo submitting immigration applications required to further stabilize their</p>

ID	Comment.	Commentor	Comment
1325	USCIS-2010-0008-0733	Suzanne McCormick on behalf of Immigration Center for Women and Children (ICWC)	<p>Comment Part 5. Means-tested Benefits Are Sufficient Evidence to Demonstrate an Inability to Pay Immigration Filing Fees and Do Not Increase Burdens for Survivors</p> <p>Means-tested benefits are often essential for supporting survivors basic economic security.¹⁵ Contrary to USCIS' assertions,¹⁶ they are a simple, clear form of proof to document financial hardship and that an applicant does not have disposable income to pay immigration fees. In our agency's experience, the receipt of means-tested benefits indicates financial hardship that would make a survivor eligible for a fee waiver. Many of ICWC clients have recently separated from their abuser and are in the process of becoming financially independent. The receipt of public benefits is often the only documentation they have regarding their income.</p> <p>USCIS appears to be willfully ignoring that receiving means-tested benefits demonstrates an individual's financial need, the very reason that the fee waiver process was created. Forcing us and our clients to recreate the means-tested benefit criteria through other evidence is burdensome and will discourage many clients from pursuing the relief Congress intended for them.</p> <p>Conclusion</p> <p>Ensuring equal access to the protections Congress created is crucial, especially for domestic and sexual violence survivors who may have few financial resources of their own. USCIS should not bypass Congressional intent and undermine these laws through fee waiver policy changes. Fee waivers provide an essential pathway for survivors to seek justice and safety.</p> <p>ICWC urges USCIS to withdraw the proposed revisions and to, instead, expand the types of documentary evidence accepted for establishing eligibility for a fee waiver so that survivors of domestic violence, sexual assault and human trafficking may equally access these protections. Strong, safe families lead to stronger, safer communities. Further restricting access to these protections puts both at risk.</p> <p>Respectfully submitted,</p> <p>Suzanne McCormick</p>

ID	Comment.	Commentor	Comment
1376	USCIS-2010-0008-1053	Michael Santomauro DePaul University Asylum & Immigration Law Clinic	<p>Comment part 3: Means-tested Benefits Eligibility Protects Congressionally Identified At-risk Populations</p> <p>Under Illinois law, victims of trafficking or other serious crimes are eligible for certain public benefits.⁴</p> <p>Individuals who intend to file, have filed, or have received a U-Visa, a T-Visa, or an asylum application may now qualify for state-funded public benefits. These benefits include Medical Assistance (Medicaid), a state food program similar to SNAP/Food Stamps, and cash assistance.</p> <p>Congress has often-recognized special considerations associated with certain populations. Congress established the U and T visas through the Trafficking Victims Protection Act of 2000 (VTVPA), with the stated finding that “adequate services and facilities do not exist to meet victims’ needs regarding health care, housing, education and legal assistance.”⁵</p> <p>Similarly, Congress passed the Refugee Act of 1980 with a stated purpose of providing “comprehensive and uniform provisions for the effective resettlement and absorption of those refugees who are admitted.”⁶</p> <p>The proposed revision to the Fee Waiver Request, Form I-912, presents a barrier to these Congressionally recognized vulnerable populations. Victims of trafficking or other serious crimes can experience unique and troubling obstacles in order to access resources or demonstrate an inability to pay. For example, an abuser may withhold access to certain documents that would be helpful to evidence economic need.⁷ Conversely, an individual in a current domestically violent relationship may not be able to show economic need because of continued comingled finances. Therefore, the ways individuals can establish fee waiver eligibility should not be narrowed.</p> <p>Refugees have fled war, persecution, violence and genocide. Refugees and asylees have</p>

ID	Comment.	Commentor	Comment
1438	USCIS-2010-0008-1199	Cecelia Levin, ASISTA	<p>***Comment did not paste well*** Comment part 4: B. Elimination of Means-Tested Benefit Criteria for Fee Waivers Will Harm Survivors</p> <p>For survivors of domestic violence, sexual assault and human trafficking, means-tested benefits support basic economic security and independence and are, therefore, critically important.27 Survivors of intimate partner violence, sexual assault and human trafficking may often be fleeing abusive living situations, may not have their own income source, or else their partners control primary documents. Some survivors may be facing critical deadlines related to their cases or otherwise may not have time or the ability to obtain documents such as tax transcripts or verification of non-filing.</p> <p>Using receipt of means-tested benefits as a stand-alone criteria for survivors is a simple, straightforward way to present their economic need without relying on documentation that may be unsafe or burdensome to obtain. By eliminating the means-tested benefit criteria for fee waivers, USCIS is eliminating one of the most unambiguous forms of evidence of financial hardship. We ask that USCIS restore receipt of means-tested benefits as a form of proof for fee waiver requests</p>

ID	Comment.	Commentor	Comment
46	USCIS-2010-0008-0184	Mara Kage	<p>Measures that formally and further marginalizes the most vulnerable groups in our communities have never been a solution to societal changes. Inclusion, equitable distribution of resources for structural well being: education, housing, healthcare; those were measures that lifted our society. In addition, the economic importance: immigrants who might fall in the assistance category contribution have been and continuous to be the backbone labor of several industries (e.g. agriculture, service, food, hotel, manufacturing). Their contribution surpasses the economic offset of public services utilized, moreover, their need for the public services has less to do with their inability to support themselves, than to have a society that will pay living wages and affordable living conditions. We must protect those in vulnerable positions from exclusionary and exploratory measures now to preserve the integrity and dignity of their lives and the fabric of our society.</p>
76	USCIS-2010-0008-0214	Suzan Bartee	<p>The people who would hope to immigrate are not outsiders. They are us. As a nation, we are stronger when we include the diverse perspectives of all nationalities. I want to live in an America that is compassionate to the poor, that is inclusive of people of all heritages, and that is more interesting, more colorful, and more joyful because of the variety of perspectives our new residents will bring.</p> <p>Helping people who are fleeing oppression, who are hoping to give their kids a better life -- this is a valuable opportunity for all Americans. We began as a nation of immigrants who hoped to find freedom and build better lives for generations to come. Let's not become so self-centered that we lose sight of our own heritage. Helping people who need help is always the right thing to do.</p>

ID	Comment.	Commentor	Comment
94	USCIS-2010-0008-0241	Tina Abadini	I am Tina Abadoni, I work for world relief Seattle. Immigrants start and maintain business at a level higher than the average American. By making higher costs for them. Your reducing the \$\$ they can reinvest in the economy.
121	USCIS-2010-0008-0262	Diane Fisch	I object to the change in the waiver fee and am horrified by all the xenophobic laws being put in place. I do not understand the fear and hate. It makes me cry.
122	USCIS-2010-0008-0277	Heather Kelly	People who arrive here as refugees or immigrants from developing countries often lack the financial resources to pay for a steep citizenship fee. Lack of financial prosperity should not be a barrier for people wishing to enjoy the stability of citizenship in a new country. We must encourage new immigrants and refugees to engage with the citizenship process and support their efforts to do so, so to facilitate their ability to find housing and employment. Raising these fees is unjust and un-American. I oppose the fee increases.
162	USCIS-2010-0008-0309	Michael Feinberg	This is an important government service supported by my tax dollars. I would much prefer to see this fee waived or lowered for those with refugee status and those granted asylum. To grant asylum and then charge fees beyond the person's ability to pay is cruel.
201	USCIS-2010-0008-0372	Suzanne Kim	Immigrants are some of the most hardest working people in the world because of where they come from. This country was built around an American dream, the Statue of Liberty welcomes immigrants since 1776. The quote, "Give us your tired, your poor your huddled masses yearning to breath free." Immigrants helped build this country and is one of the reasons this country is so great. Don't take that away, because we will be going backwards instead of forwards.
219	USCIS-2010-0008-0351	Kathryn Spada	America is a country that was created by immigrants. That shouldn't change. Keep the American dream alive!

ID	Comment.	Commentor	Comment
234	USCIS-2010-0008-0409	Rebecca Nimmons	We are a country of immigrants. And we must continue to be a country of immigrants. We need the energy they bring to our country. We need their ideas, their desire to embrace American values of freedom, justice and liberty for all. We need their hard work, their innovation, their start-ups, their taxes, their enrichment of our society and culture. Immigrants renew us and challenge us and support us and make us stronger, richer and interesting. They help make our society bigger and better with their lives and their work. We need immigrants and they need us. It's a win-win. This country belongs to the world.
286	USCIS-2010-0008-0437	Lary Stoodt	America is a nation of immigrants, our ancestors will roll over in their graves to hear how we are trying to punish people for seeking a better life in America!
318	USCIS-2010-0008-0454	Elijah Knepper	I feel like public charge is wrong. I know that many of my family that come to this country originally would have taken advantage of these programs if they could have too. I feel like we as a country should keep our doors open to those who might not have the means or need some extra help.
322	USCIS-2010-0008-0463	Mark Sanders	Not like the brazen giant of Greek fame, With conquering limbs astride from land to land; Here at our sea-washed, sunset gates shall stand A mighty woman with a torch, whose flame Is the imprisoned lightning, and her name Mother of Exiles. From her beacon-hand Glows world-wide welcome; her mild eyes command The air-bridged harbor that twin cities frame. Keep, ancient lands, your storied pomp! cries she With silent lips. Give me your tired, your poor, Your huddled masses yearning to breathe free, The wretched refuse of your teeming shore. Send these, the homeless, tempest-tost to me, I lift my lamp beside the golden door!

ID	Comment.	Commentor	Comment
409	USCIS-2010-0008-0584	Andria Keirn	Please do not implement a change to the public charge! Immigrants deserve to be able to access life supporting service without fear and worry of consequence. This change will hurt families who are already struggling to survive with limited resources and access to basic needs. Do not implement a policy that will hurt millions of immigrant and refugee families in need. This seems like a contrived effort to further prevent communities from access basic needs. Please rethink this.
477	USCIS-2010-0008-0642	Manny Lewis	To Whom It May Concern, I am writing to voice my opposition the proposed public charge rule. We shouldn't make life harder for those who simply want live in a place where many of us had the dumb luck and fortune to be born. This rule just creates more unnecessary and unneeded obstacles for them.
662	USCIS-2010-0008-0911	Sajad Ali	5 years, It is important to me to be part of this country and vote.

ID	Comment.	Commentor	Comment
678	USCIS-2010-0008-0743	Leslie Dorosin	<p>November 26, 2018</p> <p>Samantha Deshommes, Chief Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: DHS Docket No. USCIS-2010-0012, RIN 1615-AA22, Comments in Response to Proposed Rulemaking: Inadmissibility on Public Charge Grounds</p> <p>Dear Sir/Madam:</p> <p>I am writing to oppose the proposed public charge rule published in the Federal Register on October 10, 2018.</p> <p>My grandparents immigrated to this country to escape religious persecution in Russia. They both came as teenagers and spoke little English and had no real job skills. Neither had the opportunity to finish high school due to poverty and discrimination. What they had was determination and a dream for a better life.</p> <p>After arriving in New York they received government assistance which helped them to survive those early years. They both went to Adult school to learn English at and my grandfather took business classes and worked in a store. After a few years they moved to Marshalltown, Iowa where my grandfather opened his own business employing about a dozen people. Both he and my grandmother became United States Citizens. They had four sons all of whom graduated from college, three became medical doctors. Of their ten grandchildren, all graduated college and eight have advanced degrees.</p> <p>Our family has contributed to our country and continues to contribute to our communities and to our society. My family is not unusual, looking around the Silicon Valley where I live, there are so many businesses, small and large, that were started by immigrants. We are very thankful for the policies that helped my family thrive.</p>
737	USCIS-2010-0008-0868	Linda Louko	<p>I am opposed to the increase in immigration/citizenship fees being proposed.</p>

ID	Comment.	Commentor	Comment
1048	USCIS-2010-0008-1168	Petra Wilson	<p>Not like the brazen giant of Greek fame, With conquering limbs astride from land to land; Here at our sea-washed, sunset gates shall stand A mighty woman with a torch, whose flame Is the imprisoned lightning, and her name MOTHER OF EXILES. From her beacon-hand Glowes world-wide welcome; her mild eyes command The air-bridged harbor that twin cities frame.</p> <p>"Keep, ancient lands, your storied pomp!" cries she With silent lips. "Give me your tired, your poor, Your huddled masses yearning to breathe free, The wretched refuse of your teeming shore. Send these, the homeless, tempest-tost to me, I lift my lamp beside the golden door!"</p>
1077	USCIS-2010-0008-1197	Casey Adams	<p>People deserve to have freedom and justice in where they can live and work, and in the US people who cannot pay shouldn't be denied these rights. Let's have some decency and acknowledge their rights, needs, and our common humanity.</p>

ID	Comment.	Commentor	Comment
1131	USCIS-2010-0008-0343	Mass Mail Campaign 1: Comment Submitted by Faridah Bahume, Church World Service (CWS), Total as of 11/13/2018: 7	<p>Comment part 7: The Proposed Change Reinforces Fear and Creates Confusion Regarding the Public Charge Ground of Inadmissibility</p> <p>Lastly, eliminating the receipt of means-tested benefits from fee waiver eligibility reinforces the fear that receiving public benefits will hinder immigrants’ ability to become lawful permanent residents. The words “means-tested benefit” and “public benefit” have recently been given a negative connotation, which runs contrary to the purpose of these benefits and programs, as they were designed to pave the way to self-sufficiency. The proposed change has also created confusion and fear among immigrants—including refugees and asylees—who are specifically exempted by Congress from the public charge evaluation. These immigrants have been unwilling to participate in public benefits program out of fear that it may hinder their ability to become lawful permanent residents or sponsor family members. This perceived fear hurts many families that need assistance to become financially stable and self-sufficient. The proposed change will result in a detriment to the most vulnerable immigrant populations that are not looking for a “hand out,” but a “hand up” to become economically self-sufficient and fully integrated members of our communities.</p> <p>For these reasons, CWS strongly opposes the proposed change to the eligibility criteria of the Fee Waiver, Form I-912.</p>

ID	Comment.	Commentor	Comment
1250	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 4: Form I-912, Request for Fee Waiver, Part 2. Information About You (Requestor) [Page2]</p> <p>Current Language:</p> <p>Are you applying for or have status as a battered spouse of an A, G, E-3, or H nonimmigrants, a battered spouse or child of a lawful permanent resident or U.S. citizen under INA section</p> <p>Page 7</p> <p>240A(b)(2); a T nonimmigrant; a person with Temporary Protected Status; a U nonimmigrant; or a VAWA self-petitioner? Yes/No</p> <p>Recommended Language:</p> <p>Are you applying for or have status as a battered spouse of an A, G, E-3, or H nonimmigrants, a battered spouse or child of a lawful permanent resident or U.S. citizen under INA section 240A(b)(2); a T nonimmigrant; a person with Temporary Protected Status; a U nonimmigrant; or a VAWA self-petitioner? Yes/No</p> <p>If yes, a fee waiver can be approved in the absence of additional evidence provided that the applicant's request is sufficiently detailed to substantiate his or her inability to pay the fee.</p>

ID	Comment.	Commentor	Comment
1255	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 9: Part 11. Additional Information</p> <p>Current Language:</p> <p>If you need extra space to provide any additional information within this requires, use the pace below...Type or print your name and A-number (if any) at the top of each sheet; indicate the Page Number, and Item Number to which your answer refers; and sign and date each sheet.</p> <p>Recommended Language:</p> <p>If you need extra space to provide any additional information within this requires, use the pace below...Type or print your name and A-number (if any) at the top of each sheet; indicate the Page Number, and Item Number to which your answer refers; and sign and date each sheet.</p> <p>Explanation:</p> <p>Requiring an applicant to sign and date each additional addendum sheet is overly burdensome and duplicative. Having the applicant sign Form I-912 or any additional declaration under penalty of perjury is sufficient to verify the veracity of applicant's statements provided within the application. Requiring each additional page to be dated and signed will only increase the burdens, including time to complete various humanitarian applications, like the T visa for trafficking survivors and family members. The burden is particularly high for derivative family members that live abroad and have limited access to means in signing and return each additional sheet added to the application.</p>

ID	Comment.	Commentor	Comment
1256	USCIS-2010-0008-1058	Kay Buck, Coalition to Abolish Slavery & Trafficking	<p>Comment part 10: Confidentiality Notices</p> <p>Current Language:</p> <p>None Recommended Language:</p> <p>Information received in this fee waiver request, Form I-912 for an application for a survivor-based protections including but not limited to VAWA self-petition, U visa, and T visa applicants and the ancillary forms revealing family members for whom they apply is protected under 8 U.S.C. section 1367. The disclosure of information relating to an individual with a pending or approved application for T nonimmigrant status, U nonimmigrant Status, and VAWA self-petition is prohibited except in certain limited circumstances. These circumstances could include, but are not limited to, disclosure of information to law enforcement agencies with the authority to detect, investigate, or prosecute severe forms of trafficking in persons; non-governmental victims' service providers for the sole purpose of assisting victims in obtaining victim services from programs with expertise working with immigrant victims; and for purposes of national security.</p> <p>Explanation:</p> <p>CAST proposes the inclusion of a few enumerated examples under 8 USC section 1367 to allow victims of trafficking to make an informed decision and receive reassurance of the confidentiality of their information submitted through the fee waiver request. As both a direct service provider to human trafficking survivors as well as a national technical assistance provider, we have seen a chilling effect for individuals in immigrant communities who come forward and report crimes, particularly human trafficking crimes, for various reasons including fear of their own deportation or removal or fear of cooperation with law enforcement. The recommended language would demonstrate USCIS' strong commitment to protect the applicant's confidentiality and provide further clarification as to the limited circumstances of when disclosure of application information would be made. CAST strongly believes that the recommended language will provide additional reassurances to help combat the climate of fear that is prevent immigrant communities from reporting crimes and obtaining the immigration relief needed to recover from these crimes.</p> <p>We appreciate the opportunity to comment on the proposed changes to the Fee Waiver Request, Form I-912. Thank you in advance for your consideration and we look forward to a continuing dialogue with USCIS on these important issues. For more information, contact Kay@castla.org.</p> <p>Respectfully submitted,</p> <p>Kay Buck CEO</p>
735	USCIS-2010-0008-0817	Eulalia Soto	<p>As an immigration attorney and as an immigrant I urge the DHS to withdraw this proposed rule on fee waivers. Many of my clients have been able to legalize their immigration status because they were able to waive the USCIS's fees. It is critical that immigrants continue to have this opportunity. Thank you!</p>

ID	Comment.	Commentor	Comment
835	USCIS-2010-0008-0867	Alexander Dumont	<p>Comment</p> <p>I don't really see how we , a country founded on immigrants, can seriously propose that we tax or charge immigrants, especially low income immigrants. I will be very disappointed if this regulation passes. Immigrants have it tough enough coming into a new country, and we should instead be welcoming them into America, the land of the free and where any dream can be accomplished. I also don't approve of this selective immigration policy that has become us. Every immigrant is first and foremost a human being with rights and is deserving of respect, be it if they are coming from Switzerland or Guatemala.</p>

ID	Comment.	Commentor	Comment
1280	USCIS-2010-0008-1068	Peter McGraw, Texas RioGrande Legal Aid	<p>Comment part 2: 2. USCIS’s proposal is plainly inconsistent with the requirements of 8 C.F.R. § 103.7(c). Federal regulations clearly describe the basic requirements for eligibility for fee waivers. The applicant must be unable to pay the prescribed fee and the waiver must be consistent with the status or benefit sought. See 8 C.F.R. § 103.7(c)(1). USCIS’s proposal adds categorical eligibility criteria to the criteria set out by agency regulation. Under the proposed Form I-912 instructions, applicants must also present either a tax transcript or a verification of non-filing from the IRS.⁵ This proposal is inconsistent with the more general eligibility criteria set out in 8 C.F.R. § 103.7(c).</p> <p>Federal regulations also clearly describe the requirements for fee waiver applications. The request must be in writing, it must include the applicant’s statement that they are entitled to or deserving of the benefit requested, and it must state the reasons and provide evidentiary support for their inability to pay. See 8 C.F.R. 103.7(c)(2). Nothing in current regulations makes fee waiver eligibility contingent upon the submission of a particular form or particular documentary evidence. In fact, USCIS acknowledges that current regulations do not require the use of a particular form in its own policy guidance:</p> <p>“USCIS has developed the new Form I-912, Request for Fee Waiver, in an effort to facilitate the fee-waiver request process. The form will become available for public use on November 23, 2010. As the use of a USCIS-published fee-waiver request form is not mandated by regulation, USCIS will continue to consider applicant-generated fee-waiver requests (i.e., those not submitted on Form I-912) that comply with 8 CFR 103.7(c).”⁶</p> <p>USCIS’s proposal narrows fee waiver eligibility criteria and substantially changes the documentation necessary to complete a fee waiver application in a way that is plainly inconsistent with the regulation.</p>
1410	USCIS-2010-0008-1171	Laura Armstrong on behalf of La Casa Hogar	<p>Comment part 2: In addition to these concerns specifically impacting La Casa and the local clients described above, there are several other concerns surrounding this change:</p> <p>This proposal lacks financial justification. American taxpayers do not subsidize the costs of fee waivers. USCIS is a fee-based agency and does not use any discretionary appropriations for application processing. Rather, applicants to USCIS who pay full filing fees subsidize the fee waivers for lower-income applicants.</p>

ID	Comment.	Commentor	Comment
266	USCIS-2010-0008-0422	C O	This will not increase USCIS's efficiency when going through applications, and measures to streamline the application process should not be taken when they overburden the population who is applying for or assisting others apply for citizenship.
267	USCIS-2010-0008-0423	Vanessa O'Connor	This proposal is an attempt to price lower income permanent residents out of citizenship and is wrong. Moreover, (1) the proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers, rather, the proposed rule would have the opposite effect; (2) efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver; and (3) the proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.
271	USCIS-2010-0008-0425	Teresa Guglielmi	I oppose the proposed rule for the following reasons. First, it will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers and would actually have the opposite effect. Second, efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. Lastly, the proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.
300	USCIS-2010-0008-0417	Kathie McCarthy	Please oppose this bill. We are a country that benefits from a flow of people with skills and perspectives rooted in their homelands. This is designed to slow that process.

ID	Comment.	Commentor	Comment
339	USCIS-2010-0008-0510	Sarah Khimjee	The proposed rule will not increase efficiency or reduce time spent adjudicating fee waivers; the proposed rule would have the opposite effect. It will will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.
353	USCIS-2010-0008-0508	Rachel Groth	I oppose this proposal. The idea will not help the UCSIS's efficiency, and will actually harm the efficiency. It will be burdensome, make processes take longer, and only hurt those in poverty who have a right to a fee waiver. It is unintuitive and simply unfair to add an extra fee to those applying for citizenship who cannot pay that fee.
820	USCIS-2010-0008-0987	Eric Pfauth	I oppose this revision. The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver. The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers
929	USCIS-2010-0008-0981	Ruby Andrade	The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect.
962	USCIS-2010-0008-1041	John Guros	I appreciate the need to have immigration regulations. Currently there are many. Rather than making the process more time consuming, difficult on the people directly affected, and expensive for non-profits tasked with helping potential citizens, the already large backlog should be addressed
1072	USCIS-2010-0008-1192	Dana Moore	This is trash. Why should we increase overhead in this program in a way that hurts more people?

ID	Comment.	Commentor	Comment
1129	USCIS-2010-0008-0343	Mass Mail Campaign 1: Comment Submitted by Faridah Bahume, Church World Service (CWS), Total as of 11/13/2018: 7	<p>Comment part 5:The Proposed Change Will Burden USCIS</p> <p>The proposed change will be costly and burdensome to USCIS. Receipt of a benefit is the most efficient way for USCIS to confirm an applicant's eligibility for a fee waiver. Less time is consumed reviewing a benefits letter than reviewing documentation to prove income or financial hardship, which can include several pages of evidence. Social service agencies granting benefits already evaluate an immigrant's financial needs prior to granting benefits. Applicants are thoroughly screened for eligibility through a phone or in person interview. The burden of verifying income and expenses will have already been consumed by these agencies. Therefore, removing the receipt of means-tested benefits from the fee waiver criteria will not be cost effective and will place a higher burden on USCIS representatives to review the fee waiver.</p>

ID	Comment.	Commentor	Comment
1146	USCIS-2010-0008-1093	Ellen Katz, William E. Morris Institute for Justice	<p>Comment part 2: I. The Proposed Change is Unwarranted and Would Increase Administrative Burdens</p> <p>DHS's only stated rationale for the proposed change is that the current policy uses inconsistent qualifying income levels under Form I-912 due to different income levels used among states granting means tested benefits.¹ However, the Notice of Proposed Rulemaking does not identify any negative outcome stemming from the use of meanstested benefits as an indicator of poverty. Without additional evidence of the need for change, such as large-scale erroneous adjudications or other harms, variations in statebased determinations of the need for benefits do not justify the proposed change in processing of requests for fee waivers. In fact, those differences may more accurately account for need by considering the state-specific circumstances of people living in poverty, such as cost of living and need.</p> <p>Limiting consideration of ability to pay to an across-the-board assessment of where an applicant falls in relation to the Federal Poverty Level will also create considerably more work for USCIS in processing Form I-912s. The purpose of using eligibility for meanstested benefits to assess ability to pay is to save administrative expense. Benefits with already-determined financial eligibility stand as a proxy for a new and independent determination. The proposed rule would therefore add to a layer of bureaucratic expense and delay at the agency; officials will now be tasked with collecting income information, such as pay stubs, assets, and other information in every case to make a determination, provide for administrative appeals, and engage in other tasks that are streamlined under the current structure. For this reason, other government systems, including applications to file in forma pauperis in state courts, which are designed to help people living in poverty access government programs they could not afford otherwise, often use proxies rather than direct poverty assessment. As an example, in Arizona, a person who is receiving Supplemental</p> <p>Security Income, food stamps, or cash assistance is allowed to forgoing cash fees in state</p>

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1155	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 8: V. The Proposed Form Change Increases Inefficiencies in the Adjudication Process and Will Increase Processing Times for Adjudications for Immigration Benefits and Naturalization</p> <p>The proposed changes to Form I-912 and its evidentiary requirements, while presented as a way to increase efficiency in the adjudication process, will decrease the efficiency of adjudicators. The onerous requirements proposed to demonstrate fee waiver eligibility will increase the workload to already overburdened USCIS service centers, ultimately resulting in a further slowdown of processing times. Contrary to the agency's claims that these changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to adjudicate a waiver, the proposed changes to the process and documentation requirements will decrease efficiency and create a greater burden on the adjudication process.</p> <p>A. The Proposed Changes Would Create Inefficiencies by Increasing the Number of Fee Waivers USCIS Must Adjudicate</p> <p>As discussed above, the proposed changes require that each applicant submit their own fee waiver request, even if they are filing with other family members. This means that the number of fee waiver applications will increase. Rather than collecting and reviewing the data once, USCIS proposes to collect duplicate data and review it multiple times.</p> <p>The proposed changes fail to provide any benefit or consider the added work for adjudicators associated with these changes. Not only will the proposed changes increase the number of fee waivers USCIS must adjudicate; by increasing the number of adjudications, it will also lead to further slowdowns by increasing the risk of adjudication error.</p>

ID	Comment.	Commentor	Comment
1156	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 9: B. The Proposed Form Change Will Contribute to Backlogs by Requiring USCIS Adjudicators to Re-Verify and Reevaluate Information That Has Already Been Provided to and Evaluated by Another Government Agency</p> <p>As noted above, the proposed changes expand the burden on USCIS adjudicators to re-verify and re-evaluate information pertinent to inability to pay, which has already been reviewed by another governmental agency. Rather than being able to rely simply on a Notice of Action from a federal, state, or local government agency that performed an eligibility determination for a means-tested benefit, USCIS adjudicators will be performing their own income determination for all fee waiver applicants. This change will slow the processing of applications for an agency that already lags on processing times. Currently, USCIS processing times for naturalization applications (N-400), Petitions for U Nonimmigrant Status (I-918), and I-360 petitions have more than doubled since 2017.¹² Rather than addressing the real concerns associated with the increases in processing times over the past two years, USCIS is instead proposing an unnecessary, unjustified, and burdensome form change that will only exacerbate this problem. Given significant increases in processing times, it makes no sense that USCIS would allocate its resources to duplicative work rather than to adjudicating the underlying immigration and naturalization petitions.</p>

ID	Comment.	Commentor	Comment
1271	USCIS-2010-0008-1059	Elizabeth Martin	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. It is hard to comprehend the logic when you consider that the number of fee waiver requests will increase by at least 1/3rd, If USCIS staff can't keep up with the current number of fee waiver applicants how will it handle all of the additional fee waiver applications?</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create insurmountable barriers for many seeking to secure their immigration status or naturalize so they can participate fully in American life. We urge USCIS, not to implement the proposed changes to avoid the increased cost to taxpayers, and immigrants. The changes clearly add additional burdens to not just USCIS, immigrants, the IRS, and those who help immigrants navigate the USCIS system.</p> <p>The way we treat the vulnerable within our care gives insight into our values. The world is watching.</p> <p>Sincerely yours,</p> <p>D. Elizabeth Martin Attorney at Law</p>

ID	Comment.	Commentor	Comment
1290	USCIS-2010-0008-1116	Meghan Kelly-Stallings, City of Seattle Office of Immigrant and Refugee Affairs (2nd Comment)	<p>Comment part 8: The proposed rule change would drain the resources of U.S. Department of Justice (DOJ)-recognized agencies.</p> <p>This rule will greatly reduce the capacity of our nonprofit partners to effectively and efficiently serve their clients. All 12 NCP agencies are Dal-recognized agencies staffed by Dal accredited representatives. The Dal's Office of Legal Access Programs (OLAP), which recognizes nonprofit agencies and accredits their staff members, was designed to increase access to legal services for low-income immigrants_ OLAP's Recognition and Accreditation Program "aims to increase the availability of competent immigration legal representation for low-income and indigent persons, thereby promoting the effective and efficient administration of justice." This proposed rule would greatly undermine the ability of DOJrecognized agencies to achieve a key component of OLAP's mission.</p> <p>"(111CP agency] will continue working for low-income people but the time we spend on each case will be much longer. I hope we can have more support from funder, either lower the goal or increase the fund."</p> <p>"This rule change will change our client base and will change our funding opportunities to serve the low income immigrant and refugee community. This means only immigrants with higher income base will get priority when it should be the other way around. Lots of families will fall into the cracks. Our case management practices will change in that we will need to do outreach targeting the higher income communities. We might be forced to charge nominal fees."</p> <p>"Fewer clients will apply. Longer wait times for our services because each case will take longer. I still don't know what we will use to show income if no tax return was filed."</p> <p>The resources needed to prepare income- or hardship-based fee waiver applications will overwhelm the limited resources of nonprofit agencies. Besides the additional time required to prepare the 1-912, clients will also be confused about the documentary requirements, and providing extra help takes time. Each appointment to which the client does not bring the proper evidence for a fee waiver means additional staff time explaining which documents to bring to the next appointment and how to obtain them. This is time when staff would otherwise be preparing applications and attending client interviews.</p>

ID	Comment.	Commentor	Comment
1298	USCIS-2010-0008-0971	Vaughn Cox, La Union del Pueblo Entero (LUPE)	<p>Comment part 3: 11. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies.</p> <p>USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form 1-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p>

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1319	USCIS-2010-0008-0950	Brian Schaeffer on behalf of the Refugee and Immigrant Center for Education and Legal Services (RAICES)	<p>Comment part 3: II. The proposed changes will increase the inefficiencies in processing fee waiver requests while further burdening government agencies. USCIS claims the proposed changes will standardize, streamline, and expedite the process of requesting a fee waiver by clearly laying out the most salient data and evidence necessary to make the decision. Instead, these proposed changes will slow down an already overburdened system, delaying and denying access to immigration benefits or naturalization for otherwise eligible immigrants. The government estimates that the total number of responses for Form I-912 is approximately 350,000. With nearly 6 million pending cases as of March 31, 2018, DHS has conceded that USCIS lacks the resources to timely process its existing workload. These operational demands would be levied upon an agency that already suffers profound capacity shortfalls.</p> <p>This proposal also places an unnecessary burden on the IRS and fails to address whether the IRS is prepared to handle a sudden increase in requests for documents. Under the proposed rule, almost every person who applies for a fee waiver based on their annual income must also request the required documentation from the IRS in order to prove their eligibility. Moreover, all changes in employment, or non-employment, inability to work, or need to file will require an IRS verification. An unclear number of applicants will have to return to the IRS for certified copies of their transcripts. This will increase the production and duplication of documents for information that can be proven by evidence the applicant already has (e.g. with their federal tax returns or pay stubs), in a different manner (affidavits from service organizations), or through a different agency (verification of receipt of a means-tested benefit).</p> <p>We have seen over the years that fee waivers adjudicated under the 150% standard are not adjudicated uniformly. In many cases the adjudicator does not look at the documentation in its entirety. When a fee waiver is denied, the reasons for denial are not usually explained very well. The result is that clients often send the request a second or third time. The adjudication cost rises each time that the client sends the request and the agency has to adjudicate the request.</p>

ID	Comment.	Commentor	Comment
1332	USCIS-2010-0008-0999	Neal Dudovitz, Neighborhood Legal Services of Los Angeles County	<p>Comment part 4: 4. The rule would waste the limited resources of USCIS.</p> <p>In its Notice of Proposed Rulemaking, DHS estimates the "total annual cost burden associated with this collection of information is \$1,312,980." States agencies already spend substantial time and resources in determining whether individuals qualify for means-tested benefits. In their determination, they take into account cost of living in different parts of the country and other individual factors that determine whether the person qualifies for means-tested benefits. When individuals are unable to provide documentation of their low-income, states often use other methods of collecting information, such as in-person interviews and home visits. USCIS should not take this time-consuming and complicated determination into its own hands and waste the limited resources that it has when the immigration system is immensely backlogged and applications already take months to years to adjudicate.</p>
86	USCIS-2010-0008-0244	Valentyna Ostapets	<p>I am former refugee, who work at Resettlment agency and in a daily basis I help people all over around! New situation with fee waiver for services will hurt so much population of refugees, SIVs and asylees, who already fights with challenges in a new life at USA! This will be disadvantage for people who elder, disabled and have a low income! Using general system of Federal poverty guidelines automatically kick out from the services a lot of people from the different states that have much more higher price for housing. Please, open your heart for refugees and help them!</p>

ID	Comment.	Commentor	Comment
1109	USCIS-2010-0008-1229	Jean Bruggeman, Freedom Network USA	<p>Comment part 1: November 26, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Service Department of Homeland Security 20 Massachusetts Ave., NW Washington, DC 20529-2140 VIA www.regulations.gov</p> <p>RE: USCIS-2010-0008, OMB Control Number 1615-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of Freedom Network USA (FNUSA), I am submitting this response to “U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions” published in the Federal Register on September 28, 2018 (hereinafter “proposed revisions”).¹ These proposed revisions relate to Form I-912; Request for Fee Waiver and accompanying memoranda.²</p> <p>FNUSA, established in 2001, is a coalition of 57 non-governmental organizations and individuals that provide services to, and advocate for the rights of, trafficking survivors in the United States. As the largest network of providers working directly with trafficking survivors in the US, we are uniquely situated to evaluate the impact of US government efforts to address human trafficking, identify challenges, and propose solutions.</p> <p>Trafficking survivors have, by definition, suffered a financial crime. Trafficking survivors have been robbed of their earned income by the traffickers who have exploited and abused them. Most foreign national trafficking survivors also have incurred debts in their home country while attempting to escape slavery and live in the US. Trafficking survivors have been exploited by recruiters, employers, and non-regulated labor sectors that regularly</p>

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1140	USCIS-2010-0008-0600	Claire Valentin, Children's Law Center of Massachusetts	<p>Comment part 3: Second, Children’s Law Center opposes the proposal to rescind the Policy Memorandum, PM602-0011.1, Fee Waiver Guidelines as Established by the Final Rule of the USCIS Fee Schedule; Revisions to the Adjudicator’s Field Manual (AFM) Chapter 10.9, AFM Update AD11-26 (Mar. 13, 2011). This policy memorandum provides specific guidance regarding special immigrant juveniles and the evidence that is sufficient to establish prima facie eligibility under the poverty guideline threshold for an applicant filing on behalf of or as a special immigrant juvenile. This guidance allows these applicants to provide:</p> <ul style="list-style-type: none">- A recent state or juvenile court order establishing dependency or custodial assignment of the SIJ; or- A letter from a foster care home or similar agency overseeing the SIJ’s custodial placement that describes the SIJ’s inability to pay; or-An approval notice on a Form I-797, Notice of Action, for a Form I-360, filed for the SIJ. <p>This well-reasoned policy accounts for the reality that youth who qualify for special immigrant juvenile status do not have access to other forms of evidence to establish income, as explained above. This policy also has the benefit of reducing the adjudicatory burden on U.S.C.I.S. and allowing U.S.C.I.S. to quickly and efficiently grant fee waivers when provided with the listed prima facie evidence by an applicant filing on behalf of or as a special immigrant juvenile. Rescinding this policy guidance leaves vulnerable youth who are in third-party or state custody without a manner to easily qualify for a fee waiver under the poverty-threshold test. Eliminating the policy guidance that allows dependent youth to demonstrate eligibility for a fee waiver by means of alternative – more readily available – evidence under the poverty-guideline threshold criteria will result in the same negative outcomes described above, including increased dependency of youth already in state care. The stated purpose of the proposed rule to reduce</p>

ID	Comment.	Commentor	Comment
1152	USCIS-2010-0008-1094	Melissa Rodgers, Immigrant Legal Resource Center	<p>Comment part 5: III. The Proposed Form Change Particularly Harms Survivors of Domestic Violence, Sexual Assault, Human Trafficking, and Other Crimes</p> <p>Survivors may have limited access to documents needed in immigration applications due to control exerted by abusers. Additionally, more than ninety-four percent of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working.¹¹ Immigration relief specifically created for immigrant survivors of domestic violence, sexual assault, human trafficking, and other crimes acknowledges the barriers these individuals face to accessing immigration relief, adopting an “any credible evidence” standard to adjudicate these cases. However, the restrictive evidentiary requirements for fee waivers under this proposed change, coupled with the fact that IRS tax transcripts or verification of non-filing letters must be mailed to the individual, will mean that victims of domestic violence and other crimes will likely need to seek assistance to request these documents and have them mailed to a safe address, or else be discouraged from applying.</p> <p>Fee waivers are critical to ensuring survivors can access immigration relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. These changes also go against the specific standard adopted for these cases and the congressional intent underlying the immigration provisions of the Violence Against Women Act and its reauthorizations. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the very legal protections created to ensure survivors’ access to safety, security, and justice.</p>

ID	Comment.	Commentor	Comment
1194	USCIS-2010-0008-0789	Jean Bruggeman, Freedom Network. USA	<p>Comment part 1: November 26, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Service Department of Homeland Security 20 Massachusetts Ave., NW Washington, DC 20529-2140 VIA www.regulations.gov</p> <p>RE: USCIS-2010-0008, OMB Control Number 1516-0116; Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of Freedom Network USA (FNUSA), I am submitting this response to “U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Requests for Fee Waivers; Exemptions” published in the Federal Register on September 28, 2018 (hereinafter “proposed revisions”).¹ These proposed revisions relate to Form I-912; Request for Fee Waiver and accompanying memoranda.²</p> <p>FNUSA, established in 2001, is a coalition of 57 non-governmental organizations and individuals that provide services to, and advocate for the rights of, trafficking survivors in the United States. As the largest network of providers working directly with trafficking survivors in the US, we are uniquely situated to evaluate the impact of US government efforts to address human trafficking, identify challenges, and propose solutions.</p> <p>Trafficking survivors have, by definition, suffered a financial crime. Trafficking survivors have been robbed of their earned income by the traffickers who have exploited and abused them. Most foreign national trafficking survivors also have incurred debts in their home country while attempting to access a well-paid job in the US. Trafficking survivors have been exploited by recruiters, employers, and poorly regulated labor sectors that regularly leave them in debt and struggling to support their families while pursuing justice.</p> <p>In recognition of these challenges, Congress created the T and U Visas to ensure that survivors have access to immigration protections while they work with the justice system. We strongly oppose the proposed changes to the I-912 fee waiver application and instructions, as well as changes to the USCIS Policy Memorandum PM-602-0011.1.3 Instead, we call on USCIS to develop policies and procedures that ensure that immigrant survivors of human trafficking and other forms of violence and</p>

ID	Comment.	Commentor	Comment
1293	USCIS-2010-0008-1162	Chelsea Edwards, Justice at Work	<p>Commment part 2: Moreover, the proposed revisions directly conflict with the clear will of Congress that survivors not be precluded from seeking status due to inability to pay fees. The abrupt change in fee waiver policy violates the special “any credible evidence” standard Congress mandated, in express recognition that survivors of human trafficking often do not control “primary” forms of evidence. In the case of our clients, it is often true that primary forms of income have never existed because the trafficking victim was not paid for his labor or was paid in cash precisely so that the trafficker could avoid creating a record of the labor relationship. It is therefore impossible for us to generate the sort of primary evidence that USCIS seeks to require. USCIS must not impose a higher evidentiary standard on fee waivers than it would on the merits underlying petitions.</p> <p>Justice at Work urges USCIS to withdraw the proposed revisions and to, instead, expand the types of documentary evidence accepted for establishing eligibility for a fee waiver so that survivors of sexual assault and human trafficking may equally access these protections.</p> <p>Respectfully submitted, Chelsea Edwards, Esq. Independence Fellow</p>

ID	Comment.	Commentor	Comment
1301	USCIS-2010-0008-0929	Wendy Wylegala, Kids in Need of Defense (KIND)	<p>Comment part 3: III. The Proposed Revisions Would Undermine Statutory Protections for Unaccompanied Immigrant Children and Survivors of Violence in the Home Recognizing that survivors of domestic violence, sexual violence, or human trafficking often lose control of or access to many forms of supporting evidence, Congress prescribed an "any credible evidence" standard for these forms of relief.⁴ DHS regulations elaborate the application of this statutory standard to applications for survivor-based protections like VAWA self-petitions and U and T visa applications.⁵ The Proposed Revisions would in effect impose a stricter evidentiary standard on a fee waiver request than on the underlying petition for protection. This change would contravene bipartisan legislation establishing appropriate evidentiary standards for such cases, as well as statutory measures designed to ensure that victims of violence are not precluded from seeking status due to inability to pay fees.⁶</p> <p>A fair and robust fee waiver application and adjudication process must accommodate the fact that financial instability exacerbates the special vulnerabilities of unaccompanied children, asylum seekers, and survivors of violence. The Proposed Revisions would instead increase the barriers facing these vulnerable immigrants and their service providers. We urge USCIS to rescind the Proposed Revisions, and to instead to expand the flexibility of its fee waiver policies to better realize the protections that Congress established for unaccompanied immigrant children and others eligible for humanitarian protections.</p> <p>Thank you for the opportunity to provide input on the Proposed Revisions. I can be reached at csmith@supportkind.org or (202) 361-1442 if you have questions or need any further information or explanation.</p> <p>Respectfully submitted,</p> <p>/s/ Cory Smith, Esq. Vice President of Policy, Advocacy, and Communications Kids in Need of Defense (KIND)</p>

ID	Comment.	Commentor	Comment
1323	USCIS-2010-0008-0733	Suzanne McCormick on behalf of Immigration Center for Women and Children (ICWC)	<p>Comment Part 3: 1. Flexible Fee Waiver Policies and Practices are Critical for Survivors of Violence.</p> <p>In our experience, intimate partner violence, especially for immigrants, comports with studies cited by the Department of Justice' and developed by the Center for Disease Control (CDC)", that indicate the strong relationship between intimate partner violence and economic, food, and housing insecurity. Abusers commonly prevent survivors from accessing or acquiring financial resources in order to maintain power and control in the relationship. In one study, 99% of domestic violence victims reported experiencing economic abuse.'</p> <p>For these reasons, flexible fee waiver guidance and practice have been and are absolutely essential for immigrant survivors to access critical protections created by VAWA and the TVPA.</p>

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1326	USCIS-2010-0008-0928	Joomi Kim, Korean Community Service Center	<p>Comment part 1: I am writing on behalf of Korean Community Service Center in the State of Washington in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities and vulnerable individuals and would cause a significant additional burden on communities, federal agencies, and service providers. If USCIS were to make any changes to the fee waiver form, we urge the agency to expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of these applications.</p> <p>Korean Community Service Center objects to the proposed rule for the following reasons:</p> <p>This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>A.This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>the proposed rule would harm the most vulnerable populations. More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. By limiting ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p>

ID	Comment.	Commentor	Comment
1333	USCIS-2010-0008-0999	Neal Dudovitz, Neighborhood Legal Services of Los Angeles County	<p>Comment part 5: 5. The rule is contrarv to legislative intent.</p> <p>This proposed change will allocate additional time and resources to fee waiver determinations, which is inconsistent with the legislative intent to focus on providing deserving individuals with immigration benefits. Legislative intent was expressed when, in 2007, DHS authorized blanket fee waivers for victims of domestic violence, explaining that,a high number of waiver requests that adjudication of those requests would overtake the adjudication of the benefit requests themselves.²</p> <p>DHS anticipated and wanted to prevent adjudication of fee waiver requests from overtaking the process of issuing important relief to victims.</p> <p>While this action by DHS removed an obstacle for many domestic violence survivors by allowing blanket fee waivers for U nonimmigrant status and Violence Against Women Act ("VAWA") petitions, the problem remains because these applications often have necessary adjoining forms, such as work authorization requests, that still require fee waivers when applicants are unable to pay. To allow for a blanket fee waiver for a U nonimmigrant status application, but then to heighten the evidentiary burden for a fee waiver for an adjoining 1-765 Work Authorization request for the same applicant, is wholly inconsistent with Congressional intent. Thus, if the proposed change to fee waivers is enacted, the procedural obstacles surrounding the fee waiver will allow the adjudication of fee waiver requests to overtake the process of assessing the merits of an individual's immigration application. This would be inconsistent "with the legislative intent to assist persons in these circumstances" in obtaining merited immigration benefits.³</p> <p>Another reason that the proposed change contradicts Congressional intent is that it deviates from the "any credible evidence evidentiary standard that Congress established for survivor-based applications for relief, such as U or T visa applications and VAWA selfpetitions.</p> <p>4 In creating this standard, Congress acknowledged the difficulties survivors of</p>

ID	Comment.	Commentor	Comment
1339	USCIS-2010-0008-1012	Julia Brown, Immigrant Legal Advocacy Project	<p>Comment part 2: B. This proposed rule will hurt vulnerable individuals that ILAP serves. Fee waivers are important to ensure that all survivors have access to immigration protections for which they may be eligible. We at ILAP are already seeing that immigrant survivors are feeling discouraged from accessing protections that they need to be safe and economically independent. Immigrant survivors face barriers at every step of the process to gain status – from reporting the crime, to seeking legal help, to leaving an abusive partner. Contrary to what Congress intended, the proposed rule will exacerbate the barriers that immigrant survivors already face when coming forward to access protection. The proposed revisions ignore the reality of the intersections of financial instability and intimate partner violence, they increase barriers for survivors and service providers, and unnecessarily eliminate means tested-benefits as criteria for fee waivers.</p> <p>More than 94% of domestic violence survivors also experienced economic abuse, which may include losing a job or being prevented from working. Fee waivers are critical to ensuring survivors can access relief. The proposed changes will harm our clients who are survivors of domestic violence, sexual assault, human trafficking, and other crimes who are unable to meet the stricter evidentiary requirements proposed to prove eligibility. By limiting the ways a person can show they qualify for a fee waiver, USCIS is creating unnecessary burdens for survivors to access the legal protections created by Congress to ensure survivors can access safety and justice.</p> <p>The proposed revisions directly conflict with the clear will of Congress that survivors not be precluded from seeking status due to inability to pay fees. Moreover, the abrupt change in fee waiver policy violates the special "any credible evidence" standard Congress mandated, in express recognition that survivors of domestic and sexual violence, in particular, often do not control "primary" forms of evidence. Furthermore, the proposed revisions will cause significant additional burdens for ILAP's clients who are immigrant survivors of domestic violence, sexual assault and human trafficking, as well as for the service providers that assist them.</p>

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1442	USCIS-2010-0008-1199	Cecelia Levin, ASISTA	<p>***Comment did not paste well*** Comment part 8: IV. The Proposed Revisions Are Flawed in Execution</p> <p>USCIS indicated that if the agency “proceeds with the form revision after considering public comment it will also rescind the 2011 Fee Waiver Guidelines and issue new guidance on fee waivers consistent with the changes made to Form I-912.35 The proposed revisions are essentially a significant and substantive policy change disguised as form revision. It is unclear why USCIS is proceeding in this peculiar order. Changes to official USCIS policy guidance must be done in accordance with the law and follow the appropriate process and procedure, including a comment period. Furthermore, USCIS failed to post the form revisions for the full 60-day period necessary for review.36</p> <p>A. The proposed revisions ignore significant survivor protections at 8 U.S.C. § 1367. The new form asks applicants to self-identify as a survivor by asking whether they are applying for status as an abused spouse of an A, G, E-3, or nonimmigrant, battered spouse or child of a legal permanent resident or U.S. citizen under 240A(b)(2); a nonimmigrant, a person with Temporary Protected Status, a nonimmigrant or a VAWA Self-petitioners. Most of these types of relief, with the exception of Temporary Protected Status, are subject to certain protections and sanctions regarding privacy, confidentiality, and presumptions against evidence from abusers and perpetrators, codified at 8 USC 1367.37 Neither the USCIS privacy notices on the 912 instructions,38 nor the Requestors Certification on the 912 form39 contain language that mentions these critical protections for survivors. USCIS must make clear in both of these sections that any disclosure or receipt of information complies with the protections at 8 USC 1367.</p> <p>Conclusion</p> <p>Fee waivers provide an essential pathway for survivors to seek justice and safety. We urge USCIS to withdraw the proposed revisions and to instead expand the types of documentary evidence accepted to establish eligibility for a fee waiver. Only in this way will USCIS ensure</p> <p>that the survivors of domestic violence, sexual assault, human trafficking, and other forms of violence are protected.</p>

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1464	USCIS-2010-0008-1229	Jean Bruggeman, Freedom Network USA	<p>Comment part 2: 2. The Proposed Revisions will Impose Additional Barriers on Trafficking Survivors</p> <p>Foreign national survivors of human trafficking and other forms of exploitation and abuse face tremendous barriers to accessing services and support. Many survivors have developed reasonable fears of law enforcement and government agencies due to their experiences with abusive governments in their home countries. Abusers and traffickers rely on and exploit these fears, telling their victims that the US government will not protect them and that they will face even worse abuse in their home country. Additionally, few foreign nationals understand the US legal and social services system and know that protections and services exist and how to access them. Recently, trafficking survivors are expressing increased fear of the US justice system, and are even less likely to come forward for services and protection.⁶</p> <p>For these and other reasons, USCIS has never come close to approving the statutory maximum of 5,000 T Visas in a fiscal year. The highest number approved was under 900, in 2013, and has been dropping ever since.⁷ Therefore, it is especially concerning that USCIS would be increasing the barriers to fee waivers for ancillary-forms like work permits and admissibility waivers for trafficking survivors. As discussed above, few survivors of human trafficking have been paid a fair wage, have evidence of their wages, or have filed tax returns. For these reasons, flexible fee waiver guidance and practice have been and are absolutely essential for immigrant survivors to access critical protections created by VAWA and the TVPA.</p>

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1465	USCIS-2010-0008-1229	Jean Bruggeman, Freedom Network USA	<p>Comment part 3: 3. The Proposed Revisions will Impose Additional Barriers on Providers Representing Trafficking Survivors</p> <p>The ‘any credible evidence’ standard has allowed USCIS to review and approve fee waivers for over 20 years, based on the individual circumstances of crime victim survivors and their dependents. Survivors may have some documentary evidence of their trafficking, but may have no evidence of their economic status. Additionally, they may be filing for multiple family members, and gathering documentation from family members who are not in the US is very difficult.</p> <p>The T Visa, for example, allows for certain trafficking victims to file applications for their parents, spouse, children, siblings as dependent T Visas. Adding additional filing requirements for each family member, as proposed in the revisions, will cause additional delays and burdens on providers and survivors, leading to longer delays in filing for immigration relief. These delays have real consequences on survivors and their families. Congress has recognized that family members often face threats of serious harm in their home countries.</p> <p>8 Adding additional filing requirements in situations that are so dangerous, when the requested documentation is so unlikely to be available, is both counter to Congressional intent and dangerous to public safety.</p> <p>Conclusion</p> <p>Ensuring equal access to the protections Congress created is crucial, especially for domestic and sexual violence survivors who may have few financial resources of their own. USCIS should not bypass Congressional intent and undermine these laws through fee waiver policy changes. Fee waivers provide an essential pathway for survivors to seek justice and safety.</p> <p>FNUSA urges USCIS to withdraw the proposed revisions and to, instead, expand the types of documentary evidence accepted for establishing eligibility for a fee waiver so that survivors of domestic violence, sexual assault and human trafficking may equally access these protections.</p> <p>Stronger families lead to stronger, safer communities. Further restrictions represent a threat</p>

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1489	USCIS-2010-0008-1044	Connie Choi on behalf of the National Immigration Law Center	<p>Comment part 6: III. The proposed change contravenes Congressional intent. USCIS' proposed revisions to fee waiver guidance and forms run in direct opposition to the bipartisan Congressional intent in establishing the evidentiary requirements for certain populations and will discourage many from pursuing the relief Congress intended for them. USCIS must not impose a higher evidentiary standard on fee waivers than it would on the underlying petitions.</p> <p>First, by limiting the ways a survivor can show he or she qualifies for a fee waiver, USCIS has created unnecessary hurdles to access the legal protections created by Congress to ensure survivors can access safety and justice. Congress created the special "any credible evidence" standard for survivor-based protections like VAWA self-petitions and U and T visa applications, with the intent to ease evidentiary challenges that immigrant survivors often face. Fee waivers for ancillary-forms like work permits and waivers are important to ensure that all survivors have access to immigration protections for which they may be eligible. Contrary to what Congress intended, the proposed revisions to the fee waiver forms and guidance will exacerbate the barriers that immigrant survivors already face when coming forward to access protection. The proposed revisions ignore the reality of the intersections of financial instability and intimate partner violence. Second, Members of Congress have repeatedly instructed USCIS to respect the importance of naturalization. Consistent Congressional directives to USCIS exist regarding the agency's responsibilities in facilitating naturalization. For example, the House of Representatives Appropriations Committee's Homeland Security Bill Reports have consistently emphasized the need for naturalization to remain affordable and accessible. In House Report 115-948, concerning the Department of Homeland Security Appropriations Act of 2019, the Committee made clear that "USCIS is expected to continue the use of fee waivers for applicants who can demonstrate an inability to pay the naturalization fee...The Committee encourages USCIS to maintain naturalization fees at an affordable level while also focusing on reducing the backlog of applicants.¹²</p> <p>" USCIS must facilitate, not pointlessly impede, the naturalization of residents who are committed to our nation and values.</p> <p>The NPRM fails on both fronts, reducing the number of people with demonstrated financial need who</p>

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200	USCIS-2010-0008-0343	Mass Mail Campaign 1: Comment Submitted by Faridah Bahume, Church World Service (CWS), Total as of 11/13/2018: 7	<p>Comment Part 1: Church World Service’s Comments on the Proposed Change to Form I-912, Fee Waiver</p> <p>Church World Service (CWS) respectfully submits its opposition to the proposed change to the eligibility criteria of the Fee Waiver, Form I-912, and provides the following comments.</p> <p>CWS, founded in 1946, is a non-profit organization dedicated to promoting global community development through programs and partner organizations worldwide that support sustainable social and economic development. CWS is also dedicated to assisting vulnerable immigrant populations through our Immigration and Refugee Program (IRP). IRP is comprised of several departments that provide assistance to refugees and immigrants through our cooperative agreements with the U.S. Citizenship and Immigration Services (USCIS), the U.S. Department of State (DOS), and the Office of Refugee Resettlement (ORR), as well as private donations and grants.</p> <p>As part of our cooperative agreements with DOS and USCIS, CWS has assisted in resettling nearly half a million refugees and over seventy-thousand Cuban and Haitian entrants. IRP’s legal component provides legal services to low income immigrants through our network of over twenty-one legal departments and affiliates located throughout the United States. Our legal departments consist of attorneys and accredited representatives that assist in providing immigration services at little to no cost to low income immigrants through various grants.</p> <p>Our extensive experience and background assisting refugees and vulnerable immigrant populations—particularly immigrants that depend on the fee waiver—allows us to provide valuable insight on not only the detrimental effect the proposed change to the fee waiver will have on immigrants, but also on the importance of the fee waiver in achieving self-sufficiency for many immigrants.</p> <p>The proposed change seeks to eliminate the receipt of means-tested benefits from the eligibility criteria for the fee waiver. Eligibility would be limited to those proving household income at or below 150% of the Federal Poverty Guidelines (FPG) or financial hardship. The basis for the proposed change is that states use different income levels to grant benefits, which result in inconsistent income levels used to qualify for a fee waiver. However, states use different income levels to award benefits because each state has a different cost of living.</p> <p>The proposed change will significantly reduce the number of applicants eligible to fees for assisting in helping low income immigrants/ ability to become lawful</p>
218	USCIS-2010-0008-0360	Angela Bartels	<p>I support a fee waiver for people applying for US citizenship. The fee waiver is very important for low income residents and families. People should not have to choose between paying the rent, utility bills or buying food or gas for the car, so that they can apply for U.S. citizenship. Americans are a compassionate people and we need to demonstrate that compassion in ways such as this fee waiver. Thank you for taking my comment.</p> <p>Angela Bartels 2821 2nd Ave #901 Seattle, WA 98121</p>

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473	USCIS-2010-0008-0647	Nicola Smith	<p>The proposed changes to the fee waiver eligibility process is a bad idea because it will be harmful to low-income immigrants, many of whom are not legally required to file income taxes. This means that some low-income immigrants that are legally eligible for the fee waiver will be unable to prove that they are eligible. This could result in their not applying to become U.S. citizens because they cannot afford the fee. Data shows that U.S. citizens earn more than green card holders. We should be doing everything that we can to make the fee waiver accessible to low-income immigrants.</p>
475	USCIS-2010-0008-0668	Carlos Solis	<p>My name is Carlos Solis. I am writing to oppose Regulation OMB Control Number 1615-0116 issued by DHS/USCIS, Docket ID USCIS-2010-0008. Please dont make it harder for immigrants to naturalize.</p> <p>I oppose the proposed rule that would eliminate the use of public benefits to qualify for the fee waiver. The N-400 filing fee of \$725 is very expensive for many people. I oppose the rule for these reasons:</p> <p>A national income test does not account for variations in minimum wages and cost of living across the country that affect ability to pay. States and localities have already done an extensive income verification when they award an individual a means-tested benefit. Area median income in King County, WA, is \$103,400, but in Bexar County, TX, area median income is \$66,800. It would be unfair to hold residents of both counties to the same income standard, when cost of living, wages and taxes vary so greatly.</p> <p>Since more than 95% of USCISs budget comes from immigration fees, the cost of these fee waivers is borne by other fee-paying applicants for other immigration benefits. The rule does not save general taxpayers any money and will in fact generate MORE work and cost to USCIS to review additional income documentation. The additional time needed to find the necessary proof of income will stretch their staff capacity, resources and infrastructure.</p> <p>Many elderly people with the lowest incomes are not required to file taxes, so they use other currently accepted methods to verify their incomes in order to apply for the fee waiver. Changing the verification requirements would make it impossible for many of them to prove they are eligible for the fee waiver.</p>

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476	USCIS-2010-0008-0612	Emily Phillips	<p>I oppose the proposed revision because immigrants with the lowest incomes rely on the currently accepted methods to verify their income so they can apply for the fee waiver. USCIS should not punish families with the lowest incomes by eliminating current verification methods and making it harder for them to receive a fee waiver for their citizenship application.</p> <p>Immigrants of all income levels work hard and contribute to our country. Those who are low income when they apply should not be excluded for that reason. Many of our ancestors may have been low income when they arrived. Please do not make it harder to apply or qualify for citizenship.</p>
504	USCIS-2010-0008-0657	Alex Cummins	Please do not pass!
593	USCIS-2010-0008-0883	Susan Haywood	<p>I am writing in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>A. This proposal will negatively impact the ability of individuals, especially those who are vulnerable, to apply for immigration benefits for which they are eligible.</p> <p>B. This proposal will place a significant burden on individuals applying for immigration benefits and will negatively impact our communities.</p> <p>The proposed change places unfair obstacles on people who deserve citizenship and have worked toward it fairly.</p>

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594	USCIS-2010-0008-0852	Donna Zak	There is no reason to eliminate the means-tested benefit category as a way to demonstrate eligibility for a fee waiver. Anyone entitled to a means-tested benefit should be entitled to a fee waiver. Why complicate this? This is unduly harsh and burdensome on immigrants, particularly the indigent. This, and many other proposed changes to the way this country deals with immigrants, is disgraceful and disappointing.
651	USCIS-2010-0008-0881	Olivia Louko	The proposed changes to the fee waiver eligibility process are unfair to low income immigrants who are not required to file federal income taxes. These immigrants should be allowed to provide other currently accepted methods to verify their income.

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663	USCIS-2010-0008-0861	Heidi Tso	<p>I am writing to urge the Department of Homeland Security (DHS) to withdraw the proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a persons use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits.</p> <p>The rule would also make it more burdensome for U.S. Citizenship and Immigration Services (USCIS) to process fee waiver applications, since its officials would be forced to adjudicate what state agencies have already determined: applicants lack of resources and eligibility for public benefits. The rule also fails to take into account regional variation and the fact that a person may not qualify under the federal poverty guidelines yet live in an area with such a high cost of living that they are unable to afford the application fee for citizenship and other applications. This will disparately target low-income families and working class immigrants, independent of their ability to pay, which is what USCIS should be uniformly considering when deciding to grant a fee waiver.</p> <p>In calendar year 2017, almost 40 percent of citizenship applicants applied for a fee waiver, the majority of which were based on receipt of a means-tested benefit, meaning that the proposed rule has the potential to impact approximately 244,000 immigrants who have the opportunity to obtain citizenship and the right to receive fair and equal treatment from USCIS. Instead, the proposed rule would increase the overwhelming backlog of over 750,000 citizenship applications before the agency, extend waiting times for those applicants, which has already recently doubled, or worse, deter eligible immigrants from applying. This would prevent immigrants ability to integrate into the country, access higher economic and educational opportunities, and ultimately harms us all.</p> <p>As a former staff member for a nonprofit organization serving the immigrant population of Houston, Texas, I spent nearly two years assisting adults, many of them older adults, with naturalization applications and fee waivers. I would estimate I assisted in the completion of over 150 I-912 fee waivers over that time, and more than half of those applicants qualified through receipt of a SNAP benefit. For many of these families, \$725 could make or break their monthly budget. It could mean the difference between healthy, fresh produce and nutrient-deficient frozen meals. It could mean choosing between doctors visits for themselves or their children. For elderly applicants, it could mean forgoing air conditioning in Houston's stifling summer weather. Losing this public benefit qualification can and will deter qualifying immigrant families from accessing the dream of citizenship for which they meet the requirements.</p> <p>It is for these reasons that I strongly oppose the proposed rule and call on DHS to withdraw it.</p>
745	USCIS-2010-0008-0778	Chris Gordon Owen	<p>Immigrants face hurdles at many stages of their journey towards permanent status here. Form 912 seems to add to the difficulties, and it would affect the neediest people, just to jump through the bureaucratic hoops.</p> <p>I consider any possible streamlining a poor justification for discouraging poorer applicants for waivers from even trying.</p>

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755	USCIS-2010-0008-1013	Yadira Chavez, On The Move/Citizenship Legal Services	<p>Comment part 1:Samantha L. Deshommes Chief, Regulatory Coordination Division, Office of Policy and Strategy U.S. Citizenship and Immigration Services, Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>RE: Docket ID USCIS-2010-0008-Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2010-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>I am writing on behalf of On the Move: Citizenship Legal Services in opposition to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) proposed changes to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-01116, published in the Federal Register on September 28, 2018.</p> <p>On the Move is one of four non-profits who form the Napa Valley's Citizenship Legal Services Collaborative. CLS conducts outreach and education among immigrants on the benefits of citizenship, deferred action and other forms of immigration relief, immigrant rights and responsibilities, and fraud prevention. Offers low-cost application assistance and related legal immigration services to residents who want to naturalize or stabilize their immigration status. Assists legal permanent residents with citizenship interview and exam preparation, including civics and English-for-naturalization classes. At OTM, we have DOJ accredited representatives who build trusting relationships, provide essential information, and prepare the clients to work with CLS' provider of legal immigration services. The delivery of naturalization and immigration legal services is led by the legal services providers via monthly and quarterly group processing workshops, information sessions, and one-on-one consultations. CLS key action strategies include:</p> <ul style="list-style-type: none"> · Legal consultations for individuals to assess eligibility for naturalization, DACA, and other forms of immigration relief. CLS maintains a consultation calendar to offer consultations throughout Napa County on a regular basis, at workshops and through individual appointments at the convenience of clients. Staff conducting consultations identify those who are eligible for citizenship, DACA, and other possible forms of relief, through comprehensive screening. Consultations will be led and supervised by immigration attorneys and will provide opportunities for training and mentorship of new or existing DOJ accredited representatives.
774	USCIS-2010-0008-1020	John Keller on behalf of the Immigrant Law Center of Minnesota	Comment part 1
788	USCIS-2010-0008-1144	Lilia Venegas	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
801	USCIS-2010-0008-1131	Carmen Bueno	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment

ID	Comment.	Commentor	Comment
821	USCIS-2010-0008-0766	William Thach	<p>The is a Comment on the U.S. Citizenship and Immigration Services (USCIS) Notice: Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>For related information, Open Docket Folder</p> <p>Comment A</p>
844	USCIS-2010-0008-0954	Lisa Seifert, Seifert Law Offices	<p>Thank you for receiving our comments. Please do not change the fee waiver rules for citizenship application. The cost of becoming a citizen has gone up so much. \$725.00 is definitely not within a person's normal discretionary income if they are low income. In fact, this is more than rent for many people.</p> <p>Being poor should never be a barrier to becoming a U.S. citizen. Switching to tax return information is not a good solution -- this will be burdensome and hard to understand for many people. This change would cause chaos and fear in the immigrant community, which has a negative effect on everyone (ex: people stop calling the police even in case of emergency because they do not trust government entities). The change is inefficient-why double the verification process when DSHS or another gov entity has already verified? Overall, this proposed change is unnecessary, would cause fear and chaos for many immigrants who are here legally. It will also cause more work for USCIS and non-profit organizations, attorneys and the immigrants who will be faced with this barrier to citizenship.</p>

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845	USCIS-2010-0008-0898	Isabella Alvarenga	<p>I strongly oppose the proposed changes to to fee waiver eligibility criteria, USCIS Docket ID USCIS-2010-0008, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>By removing the receipt of means-tested benefits from the eligibility criteria for a fee waiver, these changes hurt already vulnerable immigrants and make it harder to obtain stable immigration status in the United States. Notably, the receipt of means-tested benefits as criteria for a fee waiver creates an efficient process where immigrants who clearly show financial hardship and thus should qualify for a fee waiver can be approved for the waiver. However, the proposed changes needlessly increase the burden on the applicant to attain further documentation and create more documents for USCIS to review. By requiring a federal tax transcript over tax returns to show household income and requiring all applications to be submitted on Form I-912 instead of, for example, an affidavit meeting the necessary requirements, the proposed changes will make the process more time consuming for both the applicant and USCIS. As USCIS is already dealing with a massive backlog in pending applications, the proposed changes worsen the problem. Furthermore, USCIS has offered no concrete evidence that the receipt of means-tested benefits has not been effective criteria for evaluating who should receive a fee waiver.</p> <p>Fee waivers help immigrants as they build their lives in the United States. The United States has a long history of being a country where one could come with a dream for a better life for their family. By working hard and persevering, so many immigrants have come to the U.S. with very little and built successful lives for themselves, their families, and in return contributed enormously to our economy. At the International Institute of the Bay Area, the nonprofit I work for and that provides legal services to low-income immigrants in the Bay Area, we see this everyday. The United States should not prefer wealthy immigrants over poorer immigrants, as the proposed changes to this rule will make apparent. To do so is wrong and Un-American.</p> <p>The proposed changes should be withdrawn immediately.</p> <p>Isabella Alvarenga Communications Manager, International Institute of the Bay Area</p>

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852	USCIS-2010-0008-0845	Abigail Gramaglia	<p>This proposal would only add unnecessary barriers for applicants who are living in poverty. Poverty should NEVER be a barrier to applying for citizenship.</p> <p>The proposed rule will not increase USCIS's efficiency or reduce USCIS's time adjudicating fee waivers; the proposed rule would have the opposite effect. Efforts to save money or increase efficiency should not be done at the cost of unduly burdening or improperly turning away applicants living in poverty who are entitled to a fee waiver.</p> <p>The proposed rule will unnecessarily create a large additional burden for USCIS, fee waiver applicants, and legal services providers.</p>
853	USCIS-2010-0008-0955	Dorinda Baker	<p>The path to citizenship should be open and not lined with road blocks. The application for US citizenship will be more difficult. Many that are applying are not well-established and may be experiencing financial hardships.</p> <p>The federal Free-Lunch Program draws the poverty line very clearly. Requesting additional income tax filing forms is a poor measure of financial status since many immigrants are living BELOW the poverty line and do not have enough income to file annual income tax forms.</p> <p>The US Citizenship and Immigration Services will prevent fewer applications and a large drop in accounts receivable if the requirements for application fee waivers criteria changes. Likewise, immigrants wishing to establish US citizenship can secure more permanent jobs and can have higher wages on the pay scale. This in turn will boost a healthy spending economy.</p> <p>Please do not adopt the pending criteria on reduced-fee passport applications.</p>

ID	Comment.	Commentor	Comment
909	USCIS-2010-0008-0913	Jane King	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
911	USCIS-2010-0008-0915	Adelaide Luboya	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
921	USCIS-2010-0008-0946	Jennie Spector	The fees are exorbitant and for those with an income it is still difficult to afford. Do not allow the fee waiver to be removed making it impossible for those who cannot afford the exorbitant fees unable to apply for citizenship, residency and other ways to remain in the country legally.
947	USCIS-2010-0008-1021	Christine Chen, Asian Americans Advancing Justice - Los Angeles	<p>Comment part 1: November 27, 2018</p> <p>Samantha Deshommes Chief, Regulatory Coordination Division USCIS Office of Policy and Strategy Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140</p> <p>Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of Asian Americans Advancing Justice – Los Angeles (Advancing Justice – LA), I am writing in opposition to the “U.S. Citizenship and Immigration Service Agency Information Collection Activity; Revision of Currently Approved Collection: Request for Fee Waivers; Exemptions”, OMB Control Number 1615-0116, published in the Federal Register on September 28, 2018.</p> <p>We urge DHS to withdraw this proposed rule on fee waivers. The proposed rule would cut off access to citizenship for hundreds of thousands of eligible immigrants who apply for a fee waiver due to the high costs of application fees. By creating this barrier based on a person’s use of means-tested public benefits, the rule would exclude eligible immigrants from obtaining citizenship based on their wealth and class status and further stigmatize recipients of those benefits. These changes would needlessly complicate and lengthen the adjudication process. As a result, they would impose significant burdens on the United States Citizenship and Immigration Services (USCIS) – which faces an already problematic large backlog of pending requests – as well as applicants, and the organizations that assist them.</p> <p>Asian Americans Advancing Justice – Los Angeles is the nation’s largest legal organization for</p>

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950	USCIS-2010-0008-1026	C Langton	<p>The American Dream shouldn't only be accessible for the rich and I am against the proposed changes to the fee waiver program for immigration.</p> <p>Fee waivers allow hard working immigrants, many of whom do the hard, demeaning jobs none of "us" want to do, to access citizenship and to maintain proof of their lawful permanent resident status needed to work and travel. Fee waivers also allow children of naturalized parents to obtain documentation of their own U.S. citizen status, and without waivers, this would be a barrier for many children as they grow into productive members of our society.</p> <p>Unless you are Native American, every one of us is here in the US because at one point our ancestors immigrated here. Allow the next generation to enjoy the freedoms we have thus far enjoyed in this country.</p>

ID	Comment.	Commentor	Comment
968	USCIS-2010-0008-1049	Alvina Yeh on behalf of the Asian Pacific American Labor Alliance, AFL-CIO (APALA)	<p>Comment part 1: November 27, 2018</p> <p>Samantha Deshommes, Chief U.S. Citizenship and Immigration Services Department of Homeland Security (DHS) Office of Policy and Strategy – Regulatory Division 20 Massachusetts Avenue, NW Washington, DC 20529-2140</p> <p>Re: Docket No. USCIS-2010-0008, OMB Control Number 1615-0116, Comments in Response to Proposed Rulemaking: Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Fee Waiver; Exemptions</p> <p>Dear Ms. Deshommes:</p> <p>On behalf of the Asian Pacific American Labor Alliance, AFL-CIO (APALA), we offer comments in response to the Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) notice of proposed rulemaking (NPRM) to discontinue the use of means-tested benefits as a factor when considering fee waivers for naturalization in favor of using income as the sole determinant.</p> <p>Founded in 1992, APALA is the first and only national organization of Asian American and Pacific Islander (AAPI) workers, most of who are union members, and our allies advancing worker, immigrant and civil rights. Since our founding, we have played a unique role in addressing the workplace issues of the 660,000 AAPI union members and that is why we are writing a letter to you today. APALA believes that fair immigration processes and decreased barriers to citizenship are necessary for AAPI workers and families to full participate in the American ecosystem. This is especially true for Southeast Asian Americans (SEAA), who are some of the most marginalized AAPI workers in our nation.</p> <p>The proposed changes to the fee waiver eligibility criteria and accepted forms of evidence create an additional burden for immigrant communities, refugees and vulnerable individuals. Narrowing the scope of factors determining eligibility for fee waivers creates additional monetary burdens negatively affecting the ability of</p>
1031	USCIS-2010-0008-1145	Humberto Mendoza	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1032	USCIS-2010-0008-1146	Mohammad Kabir	Mass mailing - personal story: Submitted PDF of a hand-written comment. Please look at the regulations.gov for comment
1033	USCIS-2010-0008-1147	Jackie An	I just spent thanksgiving with my family. This would not have been possible if America made it financially prohibitive for poor families to immigrate to the United States in the 70s.

ID	Comment.	Commentor	Comment
1127	USCIS-2010-0008-0343	Mass Mail Campaign 1: Comment Submitted by Faridah Bahume, Church World Service (CWS), Total as of 11/13/2018: 7	<p>Comment part 3: Eligibility Requirements for Supplemental Nutrition Assistance Program (SNAP) is Applied Uniformly Throughout States</p> <p>It is important to note that while states use different income levels to award benefits, eligibility requirements for some benefits are applied uniformly across states. Notably, eligibility rules and benefits levels for Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, are set at the federal level and applied uniformly across the United States. While states have flexibility to tailor aspects of the program, federal rules set income and asset limits. A considerable number—if not the majority—of fee waivers filed by low income immigrants are based on the receipt of SNAP. Thus, instead of eliminating the receipt of benefits from the fee waiver eligibility requirement, USCIS could alternatively limit the eligibility to programs that are applied more uniformly across the United States.</p>

ID	Comment.	Commentor	Comment
1274	USCIS-2010-0008-1037	Casey Sherman, Colorado Legal Services	<p>Comment part 3L The two remaining grounds for financial need-based fee waivers will not adequately replace the eliminated grounds. Many applicants who receive public benefits do not have other accurate proof of their income or proof of hardship to the extent that USCIS proposes to require. People experiencing homelessness are less likely to file taxes or have bank accounts, and thus lack the objective measures of income and wealth that USCIS expects for waivers based on income or hardship. Of the 1064 clients the ID Project has represented so far in 2018, 61% reported experiencing homelessness or housing instability. For these clients, the fairest, most accurate, and most thorough accounting of their present financial circumstances is done through verification of public benefits. The municipal, state, and federal entities allocating these benefits have already done their due diligence in assessing our clients' financial need. Further, this kind of income snapshot does not require people experiencing homelessness to retain important documents, such as a previous year's tax filing, bank statements, or several months' worth of pay stubs. These individuals are struggling to meet basic needs and dealing with recurring theft of their few personal belongings. It is unrealistic to expect them to provide the same documentation as a person with stable housing and employment. A fee waiver based on receipt of means-tested benefits closes this gap and allows the exceptionally needy to receive fee waiver with the same fairness and expediency as other applicants. We ask that Ms. Deshommes consider the potential impact on our clients and reject the proposed fee waiver policy.</p> <p>Sincerely, /s/ Jonathan D. Asher Executive Director Colorado Legal Services</p>

ID	Comment.	Commentor	Comment
1304	USCIS-2010-0008-0768	Koula Glaros- King, Community Legal Aid	<p>Comment part 2: B. This proposal will place a time and resource burden on individuals applying for fee waivers.</p> <p>First, by only accepting fee waiver requests submitted using the Form 1-912, USCIS will limit the availability of fee waivers. Applicants must continue to be permitted to submit applicant-generated fee waiver requests (i.e., requests not submitted on Form 1-912, such as a letter or an affidavit) that comply with 8 C.F.R. § 103.7(c), and address all the eligibility requirements. Eliminating this currently accepted form of request places an additional and unnecessary burden on applicants to locate, complete, and submit Form 1-912 when a self-generated request that provides all the necessary information can equally meet the requirements. The proposed requirement directly conflicts with 8 C.F.R. § 103.7(c)(2) and is therefore impermissible.</p> <p>Second, requiring each applicant to submit his or her own form will be a huge resource and time burden on applicants. Currently, family members can submit a single fee waiver application. This simplifies the filing process because all relevant data is collected in one location. This is particularly beneficial when families apply for immigration benefits with minor children, or when couples apply for naturalization at the same time. According to this proposal, every applicant must now gather the required documentation being requested. This increases the burden on applicant and duplicates information needed for a family who could have submitted their request together.</p> <p>Third, the proposal eliminates an individual's ability to use proof of receipt of means-tested public benefits to demonstrate inability to pay the prescribed fee. Receipt of a means-tested benefit is sufficient evidence of inability to pay, which is what 8 C.F.R. § 103.7(c) requires. USCIS fails to provide any evidence that accepting proof of receipt of a means-tested benefit has led the agency to grant fee waivers to individuals who were able to pay the fee. This proof is by far the most common and straightforward way to demonstrate fee waiver eligibility. Individuals who have already passed a thorough income eligibility screening by government agencies should not have to prove their eligibility all over again to USCIS. By eliminating receipt of a means-tested</p>

ID	Comment.	Commentor	Comment
1455	USCIS-2010-0008-1225	Jennifer Ocon, UpValley Family Centers of Napa County	<p>Comment part 4: III. The proposed changes will place a time and resource burden on legal service providers and reduce access to legal services, especially in under-resourced locations.</p> <p>The proposed changes detailed above will increase the burden on non-profit legal service providers and limit access to immigration legal services for individuals in need. It will make it harder to help immigrants who cannot afford the fee apply for immigration benefits and naturalization.</p> <p>Currently, as a non-profit immigration legal service provider operating in a remote region of Napa County, we organize workshops as the most efficient model to help eligible applicants apply for immigration benefits and naturalization. Workshops are helpful to both applicants and USCIS because it allows for a reduction in errors and minimizes the fraudulent provision of immigration services.</p> <p>With the proposed changes to the fee waiver form, it will become harder for us to complete applications in the workshop setting. This would dramatically reduce the level of access to legal support and immigration relief for vulnerable populations in our rural communities.</p> <p>The proposed changes to the fee waiver eligibility criteria, as well as the greater evidentiary burden on applicants and their families, will create perhaps insurmountable barriers for those seeking to secure their immigration status, be together in their communities, and naturalize so that they can participate fully in American life and be civically engaged. We urge USCIS, rather than implement the proposed rule change, to instead expand the types of documentary evidence accepted in order to establish eligibility for a fee waiver in order to ensure the fair and efficient adjudication of immigration benefits and naturalization. This will honor our country's commitment to welcoming immigrants.</p> <p>Sincerely yours, Jennifer Ocon, Executive Director UpValley Family Centers 1440 Spring Street Saint Helena, CA 94574 jocon@upvalleyfamilycenters.org (707) 265-5010 ext. 200</p>