



May 27, 2022

The Honorable Ur Mendoza Jaddou
Director
U.S. Citizenship and Immigration Services
20 Massachusetts Avenue, NW
Washington, DC 20529

Dear Director Jaddou:

On behalf of the Naturalization Working Group (NWG), we write to address the upcoming fee adjustments U.S. Citizenship and Immigration Services (USCIS) intends to propose to help meet operational needs. We respectfully request that ensuring naturalization is accessible and affordable for Lawful Permanent Residents (LPRs) remains a top priority for the agency when reviewing the fee schedule. We urge USCIS to decrease fees associated with the naturalization application, and if that is not feasible, maintain the fees at their current levels. The high cost of naturalization is one of the major barriers for LPRs who wish to pursue U.S. citizenship, and it prevents our nation and communities from realizing the benefits that new Americans confer on our economic and civic life.

The NWG is coordinated by the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund and is made up of national and local organizations committed to helping LPRs become U.S. citizens. The NWG strives to improve federal policies and practices related to naturalization and to educate legislators and other policymakers about the need to eliminate 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. Through our extensive networks with service providers, immigration practitioners, and naturalization applicants, we have developed a profound understanding of the barriers faced by low-income individuals seeking to obtain naturalization.

I. The Negative Impacts of Increased Fees

According to an estimate from the Department of Homeland Security, as of January 2019, there are 9.2 million LPRs eligible to apply for citizenship.¹ Unfortunately, the cost to apply for naturalization remains a barrier for many members of the eligible population, and as a result an increased fee will disproportionately affect low-income immigrants.² An analysis by the Congressional Research Service (CRS) of USCIS data suggests that fee increases in 1998, 2002, 2004, 2007, and 2017 were preceded by higher volumes of applications and followed by a decrease in application volume the next year.³ An additional study found that offering a fee waiver increased naturalization applications by 41 percent.⁴ Furthermore, an analysis from the Center for Migration Studies of New York (CMS) found that 39 percent of those eligible for naturalization live in households with incomes below 150 percent of the Federal Poverty Guidelines, so any proposal to increase the naturalization fee would impair the ability of eligible LPRs to pursue U.S. citizenship.⁵ Thus, increased naturalization fees would have both a detrimental impact on LPRs and would also likely cause a decrease in USCIS revenue due to a reduction in submitted applications, which would be counterproductive to the financial stability the agency is trying to achieve.

II. Additional Barriers to Naturalization

LPRs face myriad obstacles on their road to U.S. citizenship. In addition to naturalization fees, many of them also face costs such as English language and civics classes, legal fees, and other expenses that may arise during the naturalization process.⁶ This is especially burdensome for families with low-incomes and even more so when households have multiple members of the family seeking to naturalize.

Many of our organizations report that LPRs who cannot afford the costs of naturalization may resort to predatory lending, which has a negative impact on both the LPRs and our economy. The Center for American Progress reports that U.S. borrowers lost \$9.1 billion annually due to

¹ Bryan Baker, U.S. Department of Homeland Security, Office of Immigration Statistics, Office of Strategy, Policy, and Plans, Population Estimates: Estimates of the Lawful Permanent Resident Population in the United States and the Subpopulation Eligible to Naturalize: 2015-2019 (May 19, 2021), https://www.dhs.gov/sites/default/files/publications/immigration-statistics/Pop_Estimate/LPR/lpr_population_estimates_2015_-_2019.pdf.pdf.

² See Manuel Pastor and Justin Scoggins, *Citizen Gain: The Economic Benefits of Naturalization for Immigrants and the Economy*, Center for the Study of Immigrant Integration (Dec. 2012), <https://dornsife.usc.edu/csii/citizen-gain/>.

³ "U.S. Naturalization Policy - Federation of American Scientists," Congressional Research Service, accessed March 4, 2022, <https://sgp.fas.org/crs/misc/R43366.pdf>, 29.

⁴ Other factors include grassroots naturalization campaigns. Jens Hainmueller et. al., A randomized controlled design reveals barriers to citizenship for low-income immigrants, *Nat'l Acad. of Sci.* 115 (5) 939-944 (2018), <https://doi.org/10.1073/pnas.1714254115>.

⁵ Donald Kerwin and Robert Warren, "Putting Americans First: A Statistical Case for Encouraging Rather than Impeding and Devaluing US Citizenship," Center for Migration Studies, accessed March 4, 2022, <https://journals.sagepub.com/doi/10.1177/2331502419894286>, 115.

⁶ E.g., "The Cost of Immigrating to United States," *The Economic Times*, May 28, 2021, <https://economictimes.indiatimes.com/nri/migrate/the-costs-of-immigrating-to-the-united-states/articleshow/82966455.cms?from=mdr>.

predatory lending practices. Predatory lending operations are disproportionately located in low-income areas.⁷

Other barriers faced by low-income LPRs to naturalization include language barriers, lack of information about how to apply for U.S. citizenship or how to navigate the application forms, and lack of access to educational, legal, and other resources that could help them surmount these obstacles.⁸ Any increase in the naturalization fee will only create an additional roadblock to the full integration of LPRs into our nation's communities.

III. The Benefits of Accessibility and Affordability

For LPRs who are eligible for U.S. citizenship, naturalization marks an important step towards full participation in the civic life of their new home. U.S. citizenship provides many opportunities, such as the ability to vote, the enhanced ability to reunite families, eligibility for federal jobs, and increased financial security. Several studies show that naturalization confers economic benefits on new U.S. citizens, their families, their communities, and the nation as a whole. A 2012 study found that U.S. citizenship can boost individual earnings by 8 to 11 percent, leading to a potential \$21-45 billion increase in cumulative earnings over ten years that will have ripple effects on the national economy.⁹ Data from CMS show that legal noncitizens have only a 42 percent homeownership rate.¹⁰ In contrast, the homeownership rate of naturalized citizens is 68 percent.¹¹

IV. Conclusion

The NWG urges USCIS to find a way to decrease or maintain its naturalization fees so that they are not an insurmountable obstacle for low-income LPRs. Limiting the financial barriers to naturalization will increase civic and community participation and have positive economic impacts. The naturalization of eligible LPRs strengthens our democracy, our economy, and the social and cultural life of our nation. For these reasons, we look forward to continuing working with USCIS to ensure that the naturalization fees are affordable and accessible. For any questions, please contact Rosalind Gold at RGold@naleo.org.

Sincerely,

Asian Americans Advancing Justice – LA
Asian Counseling and Referral Service
Asian Pacific Islander Legal Outreach
Boulder Valley Unitarian Universalist Fellowship

⁷ "Predatory Payday Lending." Center for American Progress, August 6, 2014.

<https://www.americanprogress.org/article/predatory-payday-lending/>.

⁸ Jens Hainmueller et. al., A randomized controlled design reveals barriers to citizenship for low-income immigrants, *Nat'l Acad. of Sci.* 115 (5) 939-944 (2018), <https://doi.org/10.1073/pnas.1714254115>.

⁹ "Citizen Gain: The Economic Benefits of Naturalization for Immigrants and the Economy." Center for the Study of Immigrant Integration (CSII) at USC. Accessed March 1, 2022. <https://dornsife.usc.edu/csii/citizen-gain/>.

¹⁰ Donald Kerwin and Robert Warren, "Putting Americans First: A Statistical Case for Encouraging Rather than Impeding and Devaluing US Citizenship," Center for Migration Studies, accessed March 4, 2022, 110, <https://journals.sagepub.com/doi/10.1177/2331502419894286>, 110.

¹¹ Ibid.

Boundless Immigration
Buen Vecino
CARECEN
CASA, Inc.
Catholic Charities Dallas
Catholic Charities of the Diocese of Stockton
Catholic Legal Immigration Network, Inc. (CLINIC)
Center for Employment Training
Central American Resource Center -CARECEN- of California
Central Valley Immigrant Integration Collaborative
Chinatown Service Center
Coalition for Humane Immigrant Rights (CHIRLA)
Colectiva Legal del Pueblo
Community Lawyers, Inc.
Contra Costa Immigrant Rights Alliance
East Boston Community Council
Emerald Isle Immigration Center
GMHC, Inc
HIAS Pennsylvania
Hmong American women's association, inc.
Honest Law Group
Illinois Coalition for Immigrant and Refugee Rights
Immigrant Legal Resource Center
Immigration Advocates Network
Immigration Institute of the Bay Area
Interfaith Refugee and Immigration Service
Korean Community Service Center
Latin American Coalition
Massachusetts Immigrant and Refugee Advocacy Coalition
Mexican American Opportunity Foundation (MAOF)
Michigan Immigrant Rights Center
Mujeres Latinas en Accion
NALEO Educational Fund
National Hispanic Caucus of State Legislators
National Immigration Forum
National Partnership for New Americans
North Carolina Asian Americans Together
Northern Manhattan Improvement Corporation
OCA – Asian Pacific American Advocates
OCA-Greater Houston
OneAmerica
Pro Bono Net
Project Citizenship
Proyecto Vida Digna
Santa Barbara County Immigrant Legal Defense Center
Seattle Office of Immigrant and Refugee Affairs
Self-Help for the Elderly
Services, Immigrant Rights and Education Network (SIREN)

South Asian Network
Southeast Asia Resource Action Center
The International Institute of Metropolitan Detroit
The International Rescue Committee
The Jus Semper Global Alliance
UnidosUS
Unitarian Universalist Refugee & Immigrant Services & Education

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