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December 13, 2019

Samantha Deshommes
Chief, Regulatory Coordination Division, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
20 Massachusetts Avenue NW, Mailstop #2140
Washington, DC 20529-2140

Re: USCIS Fee Schedule Rule, DHS Docket No. USCIS-2019-0010

Dear Ms. Deshommes,

I submit these comments in response to USCIS's proposed fee rule published for comment on Nov. 14, 2019 at 84 Fed. Reg. 62280. I write to express my strong opposition to the proposed increase in the naturalization application fee (Form N-400), and elimination of fee waivers for citizenship forms, which would have the compound effect of greatly reducing naturalization and limiting American prosperity.

I am Commissioner for the 7th District of Cook County, Illinois, which has the largest foreign-born population County-wide, exceeding 110,000 foreign-bon individuals. My District is not only the most heavily immigrant, but also has one of the strongest small business districts in the Midwest. These businesses are primarily immigrant-owned and are a testament to the resilience and the contributions of the population I represent. Increasing USCIS fees is detrimental not only to the working-class families I serve, but to all of Cook County and Illinois because it will be implementing barriers to legal permanent residence and citizenship that will weaken our workforce and communities.

Naturalization is important and beneficial to all Americans and to Cook County in particular. Policies that discourage qualified lawful permanent residents (LPRs) from seeking American citizenship are counterproductive and harmful. Naturalized citizens' commitment to defending and supporting our nation demonstrates their deep patriotism, and when they become full Americans, their civic participation makes our democracy more vital. Naturalization also helps grow our economy and results in higher tax contributions. New Americans earn more, are more likely to pursue higher education, and have greater home ownership than noncitizens.

Charging ever-higher fees for naturalization means limiting this potential by preventing many hundreds of thousands of LPRs from applying for citizenship. Research has demonstrated that past naturalization fee increases have been a significant barrier to eligible LPRs, and as a result, the number of immigrants eligible to naturalize has grown to nearly 9 million. More than half (54%) of those eligible are Latino. Among the population estimated least likely to naturalize – in other words facing the greatest barriers, such as cost – fully 71% are Latino. Naturalization significantly enhances the ability of these lower-income and working-class Latinos to make valuable contributions to our nation, and these are the LPRs who would be definitively "priced out" by the USCIS proposal.

I am alarmed at the devastating effect the proposed 83 percent increase in the naturalization fee would have on our community. Congress has also recognized that rising naturalization fees hurts our national interests, and has repeatedly instructed USCIS to maintain the affordability of naturalization. Thus, proposing to increase the fee from $640 to $1,170 and eliminating fee waiver options are not only unnecessary and unjustified, but also violate Congressional intent.

USCIS should not need to significantly raise new revenue in light of the cost savings it has achieved through increased e-filing, modernization of the InfoPass system and Contact Center, closure of international offices, and other reforms. The agency can also reduce current expenses by cutting back on extraneous in-person interviews of visa applicants and by retracting needlessly burdensome additions that complicate forms.

Importantly, USCIS must withdraw its proposal to annually transfer more than $200 million in fees paid by applicants and petitioners to Immigration and Customs Enforcement (ICE). Federal law does not authorize the expenditure of immigration services fees for ICE's work; accordingly, Congress has repeatedly and pointedly refused to approve proposed transfers from USCIS's Immigration Examinations Fee Account to ICE.

There are almost 2,000 individuals in Cook County who are eligible to naturalize, and this would raise the voting-age population by 2.3%. Raising fees that would ensure a more stable quality of life for individuals who have already been contributing to our society will only continue to hold our community and economic development stagnant.

In view of the benefits of naturalization to all Americans, our enduring and bipartisan national policy of promoting U.S. citizenship, and the many preferable alternative means of sustaining agency operations, it would be harmful and counterproductive for USCIS to move forward with its naturalization fee proposal. I strongly urge USCIS to rescind the proposed naturalization fee increase and ensure the availability of fee waivers.

Thank you for your consideration of these comments.

Sincerely,



Alma E. Anaya, Cook County Commissioner, 7th District