



The Immigration Project
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12/25/2019

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Regulatory Coordination Division
Office of Policy and Strategy
US Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Ave. NW, Mailstop #2140
Washington DC 20529-2140

RE: DHS Docket # USCIS-2019-0010
Proposed rule— U.S. Citizenship and Immigration Services Fee Schedule

To whom it may concern:

On behalf of The Immigration Project, I am submitting the following comments regarding the proposed schedule of immigration fees that US Citizenship and Immigration Services (USCIS) published in the Federal Register on November 14, 2019, 84 Fed. Reg. 62280 et seq.

The Immigration Project is the principal provider of non-profit immigration legal services in Central and Southern Illinois. We are staffed by experienced immigration attorneys and Department of Justice Accredited Representatives.

We strongly oppose the proposed rule. Many of the immigrants and refugees we work with already struggle to pay immigration fees. The steep increases proposed by USCIS will prevent hundreds of thousands of immigrants from seeking US citizenship and other benefits that improve our lives and our communities.

We oppose the dramatic increase in the fee for N-400 naturalization applications. Many of the applicants we serve struggle to afford the current fee of \$640 (plus \$85 for biometrics). Raising the fee to \$1,170 will still further limit the families and communities we serve from applying for and gaining US citizenship. Access to accurate, complete information regarding immigration law is geographically and economically restricted for underserved immigrant populations in downstate Illinois, and a fee increase would further restrict access to immigration benefits for most of the communities we serve.



We also oppose USCIS' proposal to limit fee waivers on naturalization and most other applications. Out of the naturalization clients we serve, more than half have received fee waivers for citizenship. Without fee waivers, these people would not have been able to afford to apply for naturalization, and would not now be able to vote or enjoy the other benefits of citizenship, of which they are legally entitled.

We also oppose the new fee for DACA renewals. Immigrant youths already struggle to pay the existing fee of \$495. Adding a further fee will only discourage current DACA grantees from renewing.

We also stand in opposition to these additional proposals:

THE NEW \$50 ASYLUM FEE

CHARGING ASYLUM APPLICANTS FOR FIRST-TIME WORK PERMITS (\$410)

INCREASING THE FEE FOR I-601A PROVISIONAL WAIVERS (FROM \$630 TO \$960)

CHARGING ADJUSTMENT APPLICANTS SEPARATELY FOR WORK PERMITS AND RE-ENTRY PERMITS

Nothing requires USCIS to charge these fees or to otherwise attempt to recover the full cost of processing these and other applications. Instead of raising these fees, USCIS should look at other ways of enabling applicants for naturalization, DACA, and other benefits who otherwise could not afford to apply. USCIS should adjust other fees paid by those who are better able to pay more, or ask Congress to provide funding to pay at least part of USCIS's costs.

For all of these reasons, we urge USCIS to withdraw the proposed fee schedule. Thank you for your consideration of earth's people at this holiday season.

Sincerely,

The Immigration Project Staff, and
The Immigration Project Board