



**WORLD RELIEF**

March 14, 2007

Director, Regulatory Management Division  
US Citizenship and Immigration Services  
Department of Homeland Security  
111 Massachusetts Ave. NW, 3<sup>rd</sup> floor  
Washington DC 20529.

**RE: DHS Docket # USCIS-2006-0044**  
**Proposed rule— Adjustment of the Immigration and Naturalization Benefit**  
**Application and Petition Fee Schedule**

On behalf of World Relief DuPage, we are writing to strongly oppose the increase to immigration and naturalization fees that US Citizenship and Immigration Services (USCIS) proposed on February 1, 2007.

World Relief DuPage is a Christian social service and refugee resettlement agency affiliated with the National Association of Evangelicals. Our mission is to partner with churches to holistically assist immigrants, refugees, and members of their communities to become fully integrated members of society. One of the key ways that we assist in this integration process is by providing immigration legal services. We are accredited by the Board of Immigration Appeals to provide these services, which ensure that the refugees and immigrants that we serve comply with U.S. immigration law by filing all necessary forms and by applying for those benefits for which they may be eligible, including but not limited to I-485s, I-90s, I-129Fs, I-130s, I-131s, I-864s, I-730s, I-751s, I-765s, I-821s, N-400s, and N-600s. We charge nominal fees as permitted for a BIA-accredited organization, striving to charge as little as possible while maintaining our quality services. Of course, the immigrants and refugees that we serve are responsible to pay the fees charged by USCIS for the particular forms.

Many of the immigrants and refugees we work with on a daily basis already struggle to pay these immigration fees. We have a file cabinet full of naturalization cases, for example, that have not yet been submitted because the client does not yet have the \$400 currently necessary to apply.

The steep increases proposed by USCIS, which in some cases double the current fee, would put the goals of gaining permanent resident status, reuniting with family members, and ultimately becoming a US citizen farther out of reach. USCIS should be building bridges for immigrants to move toward citizenship, not putting up walls.

The proposed fee for naturalization is particularly jarring. As recently as 1998, the cost to apply for citizenship was \$95. In 2002, after the Bush Administration took office, the costs (including biometric fees) went up from \$250 to \$310. The total fees are now \$400, a fourfold increase in the past eight years. Now USCIS is proposing a further increase of



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70%, to \$675. An immigrant working at a minimum-wage job would need to work for more than three weeks and save all of his earnings in order to pay this fee.

Even more startling is the proposed cost of filing for adjustment of status, which for many immigrants is the first step on the road leading to US citizenship. That application has risen from \$130 in 1998 to \$325 today, plus \$75 for biometrics. Under the proposed rule, the price will rise to \$905 plus \$80 for biometrics. In other words, it will cost nearly \$1,000 for an immigrant to get a green card and start the five-year countdown to citizenship. A minimum-wage immigrant worker would need to save a full month's pay to afford the proposed fee. While this new fee will include Employment Authorization and Advance Parole, many of our low-income clients do not presently apply for these benefits. At a time when our nation is grappling with what to do with the 10 to 12 million people who are undocumented in our country, it is illogical that we should be making the cost for those who are eligible to apply for lawful permanent residence prohibitively expensive.

USCIS claims that the fee increase is necessary to improve service. USCIS definitely needs to improve service, as shown by the continuing backlogs in application processing and the months-long (even years-long) delays caused by security checks. Last October, the Government Accountability Office reported that the agency had lost track of 110,000 files needed to process citizenship cases. Our clients have experienced many of these problems – with mail sent by certified mail and signed as received then apparently disappearing, and many clients waiting for FBI background checks for more than a year. We agree that there is room for improvement, and we applaud USCIS's efforts to improve service. We nevertheless believe that the burden of paying for such improvements should not rest solely with immigrants who are already struggling to pay agency costs and receiving poor service.

USCIS also argues that it has no other option than raising fees if it wants to cover its costs. In fact, there are no laws that require USCIS to fund all of its operations through fees. Nothing prevents USCIS from pursuing other sources of revenue, including asking Congress for appropriations. Indeed, USCIS has sought and received Congressional funding several times in the past

Most basically, immigration and citizenship are public goods that benefit our entire country and that we as a nation should help pay for. Immigrants bring their talent and hard work to our economy. They pay taxes and help revitalize our communities. In becoming citizens, immigrants demonstrate their strong commitment to their new home country by learning English, gaining knowledge about American history and government, and swearing allegiance to the United States. It is little wonder that newly naturalized citizens, eager to participate in our democracy, consistently vote at higher rates than other citizens. We should be encouraging immigrants to become part of our community by gaining legal status and becoming citizens, not setting up barriers that block their path and keep them out.

For all these reasons, the proposal to increase immigration fees is misguided and counterproductive. We urge USCIS to reconsider this proposal, and to seek other sources



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of funding for its operations, rather than add more burdens on immigrants. Thank you for your consideration.

Sincerely,

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