

March 13, 2007

Director, Regulatory Management Division
U.S. Citizenship and Immigration Services
Department of Homeland Security
111 Massachusetts Avenue, NW, 3rd Floor
Washington, DC 20529

Dear USCIS Regulatory Management Division:

Church World Service, Immigration and Refugee Program (CWS/IRP) is a humanitarian, faith-based organization that works to welcome the stranger, relieve the weary and promote justice for the oppressed. This legacy is carried out through our member denominations and our refugee resettlement affiliates.

As an organization concerned with the well-being of refugees and immigrants, we are concerned about the recently proposed increases in USCIS service fees. Such increases will disrupt family unity, further victimize vulnerable populations, and be economically infeasible for low-income immigrants. While we agree that service quality should be improved to eliminate the backlog and remedy misplaced cases (up to 110,000 as estimated by the GAO), this burden should not be borne solely by immigrants who are already struggling to cover agency payments.

Division of Families

We are especially disappointed with the burden that the proposed increases would place on families. Families are the backbone of our society. Our immigration policies should never prevent a mother from being with her children, or a husband from joining his wife. The integrity of families should not be sacrificed for business convenience. We oppose all fee increases that would jeopardize family reunification, noting particularly I-129F, I-130, I-600/A, and I-187. The I-817 application for family unity benefits would increase by 120 percent and the applications for a relative and fiancé would increase by 87 percent (\$190 to \$355) and 156 percent (170 to 455) respectively.

Under this new fee structure, an individual earning minimum wage would have to save an entire month's pay in order to file an adjustment of status application. A family living slightly above poverty level would have to pay almost 8 percent of their total income in immigration fees. Parents should not have to choose which child can apply for citizenship versus another.

Abandonment of Vulnerable Populations

We commend USCIS for eliminating fees for certain interim benefits and initial applications for T-visas (I-914) and VAWA qualifying individuals. However, these vulnerable populations would still suffer from the proposed changes. Victims of human trafficking and gender-based violence are often in desperate financial situations. Should these increases take effect, many could not afford to adjust their status, apply for work permits, or reunify their families, and could face deportation or elongated detention.

Rather than enacting these fee increases, USCIS should work with Congress to create an alternative and permanent funding stream for immigration services. No law prohibits USCIS from diversifying its revenue through congressional appropriations, which has been accomplished in the

past. Officials should also take into account various alternatives to detention and deportation that would prove more cost effective and less harmful to families and communities in the United States.

Economic Infeasibility

Many of the proposed fee increases are excessive, unrealistic, and do not reflect immigrants' diverse economic situations. As Congress considers comprehensive immigration reform, we advocate against these fee increases which would discourage individuals from residing legally in this country. The justification by USCIS officials that this is a "business decision" does not coincide with the nature of government services, which lack the price-control mechanisms present in competitive markets.

The proposed changes would increase the fee to adjust from temporary to permanent residency by 661 percent (from \$180 to \$1,370). The fee for a naturalization application, which has already increased by 400 percent under the Bush Administration, would increase again by 80 percent (from \$330 to \$595). Such large marginal increases are unprecedented, unnecessary and detrimental to the pursuit of the American dream. Immigrants paying these fees are law abiding individuals who pay taxes, contribute to their communities, speak English and know American history. We all benefit from increases in legal immigration and citizenship--economically and culturally. Immigrants should be encouraged, not hindered from applying for legal status.

The United States should provide refuge and opportunity – welcoming "the tired, the poor, the huddled masses yearning to breathe free." In the name of families, vulnerable populations and those seeking a better life, please do not enact the proposed USCIS fee increases.

Sincerely,

Amy BeVille Elder

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