

March 28, 2007

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

RE: DHS Docket # USCIS-2006-0044

**Proposed rule— Adjustment of the Immigration and Naturalization Benefit
Application and Petition Fee Schedule**

Jewish Vocational Service strongly opposes the increase to immigration and naturalization fees that US Citizenship and Immigration Services (USCIS) proposed on February 1, 2007.

A large proportion of the immigrants and refugees with whom we work on a daily basis struggles to meet immigration fees, which they must pay in order to become contributing members of our society. These dramatic increases by USCIS would put up barriers for immigrants seeking to reunite with family members, obtain permanent residency status, and become US citizens. Jewish Vocational Service supports creating opportunities for immigrants to further contribute to our Nation while achieving their goals. These increases are extremely detrimental to these objectives.

The fee increase for naturalization is particularly problematic. The cost to apply for citizenship has risen from \$95 in 1998 to \$400 in total fees at the present time, a fourfold increase over the past eight years. A further increase of 70% to \$675 creates enormous barriers to naturalization for immigrants, a large number of whom work at minimum-wage jobs.

Particularly alarming is the proposed increase for filing for adjustment of status, which puts immigrants on the road to citizenship and contribution to U.S. society. That application has risen from \$130 in 1998 to \$325 today, in addition to \$75 for biometrics. The proposed rule would increase the price to \$905 plus \$80 for biometrics. These rule changes would bring to nearly \$1,000 the cost for an immigrant to obtain a green card and start the five-year waiting period for citizenship. For minimum-wage immigrant workers, this puts citizenship out of their reach. Further, the effect of this increase on families with several children would be particularly tragic because of the combined cost for family members.

Jewish Vocational Service agrees with USCIS that it is necessary to improve service. The backlog of months and in some cases years for processing applications clearly needs to be improved. The Government Accountability Office (GAO) reported that the agency lost track of 110,000 files needed to process citizenship cases. Therefore, MIRA

congratulates USCIS efforts to improve its services. Nonetheless, we believe that it is counterproductive to place the entire burden of paying for such improvements on the backs of immigrants struggling to pay agency costs.

There are other mechanisms through which USCIS could cover its costs. No laws require USCIS to fund its operations through fees, and no laws prevent USCIS from asking Congress for appropriations. In the past, USCIS has sought and received Congressional funding.

The benefits of legal immigration and citizenship serve our entire country. Immigrants are the engine of our economy without which many U.S. industries would collapse. Through their tax dollars and hard work, immigrants help revitalize our communities and keep our Nation's industries running. Allowing citizens a reachable path to citizenship allows them to build strong ties to their new home, to learn English, to gain knowledge of American history and government, and to swear allegiance to the United States of America. Immigration policies should encourage immigrants to integrate into our community by gaining legal status and becoming contributing citizens, not to remain in the shadows.

For the aforementioned reasons, proposals to dramatically increase immigration fees are counterproductive and detrimental to our Nation. Jewish Vocational Service strongly urges USCIS to reconsider this proposal and to seek other sources of funding for its operations instead of placing additional burdens on the immigrants who are trying to become productive members of society. Thank you for your consideration.

Sincerely,

Genie Belozersky



Jewish Vocational Service
29 Winter St. 3rd Floor
Boston, MA 02108

617-399-3229

gbelozersky@jvs-boston.org