

**CATHOLIC
SOCIAL
SERVICES**

OF SOUTHWESTERN OHIO

March 12, 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**

Dear Director:

On behalf of Catholic Social Services of Southwestern Ohio, I am writing to strongly oppose the increase to immigration and naturalization fees that US Citizenship and Immigration Services (USCIS) proposed on February 1, 2007.

Main Office

- 100 East 8th Street
Cincinnati, OH 45202
513 241-7745
888 256-0379 TDD
513 241-4333 Fax
www.cssdoorway.org
- 9600 Colerain Avenue, Ste. 305
Cincinnati, OH 45251
513 385-9600
513 385-3771 Fax
- 930 Ohio Pike
Cincinnati, OH 45245
513 752-0113
513 752-0114 Fax
- 10700 Montgomery Road
Cincinnati, OH 45242
513 752-0113
513 752-0114 Fax
- 417 Anderson Ferry Road
Cincinnati, OH 45238
513 922-6537
513 922-6537 Fax
- Su Casa Hispanic Center
7036 Fairpark Avenue
Cincinnati, OH 45216
513 761-1588
513 761-9538 Fax
- Northern Brown Senior Center
P.O. Box 211
Fayetteville, OH 45118
513 875-2317
513 875-2196 Fax

We provide refugee resettlement and immigration services in the Greater Cincinnati Area. It is a struggle for most of our clientele to pay the current immigration fees. The steep increases proposed by USCIS, which in some cases double the current fee, put the goals of gaining permanent resident status, reuniting with family members, and ultimately becoming a US citizen farther out of reach for our people.

We are particularly concerned about the proposed fees for refugee travel and naturalization: Refugee travel usually arises because of a family crisis and cannot be planned for. Most refugees initially have minimum wage jobs and the current fee of \$170 in addition to actual travel costs is very difficult. This proposal would almost double this amount to \$305. This will make it even less possible to look after ill and dying parents and related family concerns. The proposed fee for naturalization is particularly alarming and will definitely discourage applications. 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 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. With the cost of housing, ours is less expensive than most other communities, food and shelter, that is not possible for our refugees and, again, will delay their applications.

A Hamilton County Community Mental Health Board Agency



Opening our doors and embracing our community with counseling and support
Serving people of all faiths

Perhaps of even greater concern 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.

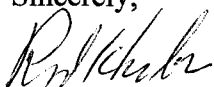
USCIS claims that these fee increases are necessary to improve service. We do not dispute the need for USCIS to improve service. The continuing backlogs in application processing and the months-long and all too frequently even years-long delays caused by security checks are indeed a problem. One of the bigger problems is that all too often some local officials want to treat refugees like undocumented because in their view their status has expired. Last October, the Government Accountability Office reported that the agency had lost track of 110,000 files needed to process citizenship cases. 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.

We believe that USCIS does have options other than continuing massive fee increases 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

We hold that 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. By 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 encourage immigrants to become part of our community and help them to gain legal status and become citizens. We should not set up barriers that complicate and block their paths in the name of false economy.

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

Sincerely,



Rod Huber, MSW, LISW
Director of Family Services