



Naturalization Application Fee Adjustments

Susan Coutin, University of California-Irvine

Dear Director Joseph B. Edlow:

Thank you for the opportunity to comment on DHS Docket No. USCIS-2026-0265, which proposes to increase the N-400 and N-336 fees and eliminate fee waivers and reductions. My comment on this proposed rule change is based on my professional expertise as a legal anthropologist and professor who has spent decades doing research regarding the ways that Spanish-speaking immigrants, particularly from Central America, navigate immigration processes in the United States. I am familiar with scientific studies of immigrant communities and have conducted hundreds of in-depth qualitative interviews with immigrants who seek to regularize their status in this country, and with non-profit attorneys and service providers who represent them and help them to prepare paperwork.

I **oppose** the proposed fee increases and the elimination of fee waivers and reductions. My stance on the proposed changes is based on evidence that the United States benefits when lawful permanent residents naturalize, the unreasonable nature of the proposed costs, the likelihood that increased costs will lead eligible lawful permanent residents to delay or forgo naturalization, and the hardships associated with remaining a lawful permanent resident rather than naturalizing.

Naturalization Benefits the United States

Naturalization helps newcomers to the United States become a full and recognized part of the social fabric through employment, family relationships, and civic engagement. By permanently resolving the question of immigrants' relationship to the United States, naturalization promotes strong interconnections between those who were born outside of the country and those who were born here. Historically, naturalized citizens have been among the **most loyal** and dedicated residents of the United States. My own interviews with immigrants suggest that the desire to naturalize is grounded in their commitments to the United States, their sense that this country is where they belong, and their desire to contribute to the country through **military service** or civic engagement. Furthermore, a **report** from the University of Southern California found that naturalization increased individual earnings by 8-11%, leading to an increase in GDP at the national level. It therefore benefits the country to encourage naturalization. Legal scholar Hiroshi Motomura coined the term "**Americans in Waiting**," to describe the notion that immigrants to the United States are on a pathway to full membership in U.S. society, and that historically, U.S. policies were designed to promote integration. The proposed rule harms the United States by discouraging naturalization, preventing the country from benefiting from the contributions that newly naturalized citizens generate, and deviating from the well-established tradition of being a welcoming nation.

Proposed Cost Increases are Unreasonable and Unjustified

The proposed fee increases are enormous, ranging from 75%-83%. These increases are well beyond the **rate of inflation**, which is currently at 4.2%, and they vastly exceed **wage increases**, which are currently at 3.4%. Lawful Permanent Residents who hope to naturalize likely have already been saving to apply for naturalization, so this fee increase would make their financial goals a moving target.

The proposed rule justifies these increases by the increased costs of additional vetting and screening of naturalization applicants. Yet, this additional vetting and screening is a policy choice on the part of the Trump administration and is not justified by security concerns, given that an **extensive body of criminological research** has concluded that the foreign-born commit crimes **at lower rates** than do native born Americans. Moreover, naturalization applicants have already been screened multiple times by US immigration authorities prior to arriving at the naturalization stage, therefore this increased screening is unnecessary and is a waste of taxpayer money.

Increasing the Costs of Naturalization and Eliminating Fee Waivers and Fee Reductions Will Discourage Applications

Low-income lawful permanent residents who qualify for fee reductions or waivers under current guidelines are no less vital to the country's well-being than are those who have more financial resources. Lawful permanent residents who seek waivers have experienced financial disadvantages associated with their immigration histories. Many endured hardships in their countries of origin prior to immigrating, experienced employment disadvantages as noncitizens, or earned professional degrees that were **not recognized** in the United States. Their income has no bearing on their ability to contribute to the United States after naturalizing. Some lawful permanent resident subgroups, such as domestic violence survivors who experienced **financial abuse**, may face ongoing financial challenges and therefore, without free waivers or reductions, may never be able to qualify.

It is a Hardship to Remain in Lawful Permanent Residency Status Instead of Pursuing Naturalization

My **research** has documented hardships associated with continuing to live in the United States as a lawful permanent resident instead of naturalizing. Lawful permanent residents face longer delays reuniting with family members, cannot qualify for jobs for which citizenship is required, and are unable to participate fully in the political process in the United States through voting. Increased fees are a hardship, forcing otherwise eligible lawful permanent residents to choose between application fees and necessities, such as food and rent. Encouraging naturalization, instead of imposing additional obstacles through increased costs, would enable lawful permanent residents, many of whom are deeply patriotic, to contribute more fully to the well-being of this country.

Sincerely,

Susan Coutin, Ph.D.