

December 28, 2019

Ms. Samantha Deshommès

Chief, Regulatory Coordination Division, Office of Policy and Strategy

U.S. Citizenship and Immigration Services, DHS

20 Massachusetts Avenue NW, Washington, DC 20529– 2130

DHS Docket No. USCIS–2019–0010

Dear Ms. Deshommès,

I write to respond to DHS' invitation for public comments regarding the U.S. Citizenship and Immigration Fee Schedule rule change. The proposal would increase the cost associated with applying for naturalization by 29 percent, which is already high at \$640 for form N-400 alone. The rule change proposal will also increase the cost of many other immigration benefit request fees. As someone who studies urban poverty, inequality, and local movements and who comes from a Mexican immigrant family, I recognize how a change of this magnitude will deeply fracture the ability of permanent residents to achieve US Citizenship.

Citizenship should not be reserved for the wealthy. Yet, people who become naturalized citizens have more money and more education. In 2017, the median household income for naturalized citizens was \$66,000¹, higher than noncitizens (\$47,300) and US born citizens (\$60,000). During the same year, over one-third of naturalized persons over 25 had a bachelor's degree², which again is a higher share than both noncitizens and US born adults. Naturalized citizens are also almost twice as likely to own homes as noncitizens, and are more likely to be employed.

Socio-economic stability appears to be not only a requirement for naturalization, but also one of its effects. But for many leaders in my recent study of grassroots family-focused organizing in Chicago, this stability is out of reach³. Through in-depth research in Chicago on the family-focused community organizing led by Latina and

¹Blizzard, Brittany and Jeanne Batalov. 2019, July 11. "Naturalization Trends in the United States." Migration Policy.org

<https://www.migrationpolicy.org/article/naturalization-trends-united-states#Socioeconomic>

²Ibid.

³Cossyleon, Jennifer 2018. "Coming Out of My Shell": Motherleaders Contesting Fear, Vulnerability, and Despair through Family-focused Community Organizing. *Socius*, 1-14.

<https://journals.sagepub.com/doi/full/10.1177/2378023117734729>

African American mothers and grandmothers, I learned firsthand about how US citizenship was simultaneously coveted and unreachable for community members because of cost. These grassroots leaders were deeply involved in their communities, taking information and suggestions to policy makers in order to improve the policies and practices that benefit all of our families. Yet, many had little legal claim to a country they called home, where their children were born, and where they had lived and worked for decades, simply because they were not US citizens.

Expanding access to US citizenship is a vital step towards strengthening the democratic participation and economic stability of immigrants. However, not having enough money is one of the reasons nine million⁴ permanent residents (green card holders) have not applied for naturalization, even though most have been able to do so for over ten years. I believe this rule change is yet another way the current administration is attempting to marginalize immigrant communities who immensely contribute to our nation.

I also fundamentally disagree with the use of the Immigration Examinations Fee Account (IEFA) funds to support any of the operations of ICE, including enforcement. I believe this funding stream will only further motivate the current administration to increase the cost of the Application for Naturalization, as well as other immigration benefit request fees, and to continue its deportation agenda, which causes family separation and irreversible community anxiety and fear.

I strongly oppose the U.S. Citizenship and Immigration Fee Schedule rule change and ask that it be removed from consideration. As I learned from Chicago's grassroots leaders, citizenship provides much needed peace of mind, family freedom, and an added layer of protection and power. In order to fully realize the full promise of American democracy, we should reduce financial barriers to the naturalization process. US immigrant communities face a number of logistical and emotional hurdles—exorbitant application fees should not be another barrier to naturalization.

Sincerely,



Jennifer E. Cossyleon, PhD

Mellon/ ACLS Public Fellow

Adjunct Lecturer, Georgetown University

Member of the Scholars Strategy Network

⁴Baker, Bryan. 2015. "Population Estimates: Lawful Permanent Resident Population in the United States." Office of Immigration Statistics.

https://www.dhs.gov/sites/default/files/publications/lpr_population_estimates_january_2015.pdf