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August 18, 2026

Ms. Samantha Deshommes, Chief
Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529

Re: U.S. Citizenship and Immigration Services Fee Schedule, DHS Docket No. USCIS-2026-0265, RIN 1615-AD08

Dear Chief Deshommes:

The National Immigration Project submits the following comment in opposition to the Department of Homeland Security (DHS) proposed fee increases for lawful permanent residents (LPRs) to submit forms N-400 and N-336 to U.S. Citizenship and Immigration Services (USCIS) to apply for naturalization and to request a hearing in naturalization proceedings, respectively. Through this rule, DHS seeks to nearly double the filing fees for N-400 naturalization applications and N-336 naturalization appeals. Additionally, DHS seeks to eliminate the reduced fee option for noncitizens with a household income below 400 percent of the Federal Poverty Guidelines (FPG) and eliminate fee waivers for both N-400 and N-336 forms. These proposed changes are not necessary for USCIS to adjudicate naturalization requests; instead they are a tool to decrease access to naturalization.

The National Immigration Project is a national nonprofit membership organization that provides support, referrals, and legal and technical assistance to attorneys, community organizations, families, and advocates seeking to advance the rights of noncitizens. The National Immigration Project fights for dignity and due process for immigrants and their families through federal litigation, advocacy, and community organizing. We believe that DHS should not weaponize fees to prevent noncitizens from asserting their rights by making the filing of applications for immigration benefits unaffordable. The National Immigration Project strongly opposes the proposed fee increases and elimination of longstanding avenues to make the N-400 more affordable.

The proposed USCIS fee schedule disproportionately increases fees leaving U.S. citizenship accessible primarily to the affluent. The proposed fee schedule would raise the N-400 paper filing fee from \$760 to \$1,330 and the N-400 online filing fee from \$710 to \$1,280—nearly doubling the fees. DHS also seeks to raise the N-336 paper filing fee from \$830 to \$1,475 and the N-336 online filing fee from \$780 to \$1,425—again, nearly doubling the fee. The new fees will push the cost of naturalization applications and appeals over \$1,000, a payment that is unattainable for most Americans as 53 percent of Americans do not have sufficient liquidity or access to funds to cover a \$1,000 emergency,¹ and LPRs generally have less average wealth than naturalized and U.S.-born citizens.² Congress has called on USCIS to keep the pathway to citizenship affordable and accessible.³ Pursuant to this expectation, USCIS has historically redistributed a portion of the cost of naturalization applications among other application fee types to subsidize affordable naturalization and encourage immigrant integration.⁴ This proposed fee rule would abandon that historic practice and charge the purported actual cost of naturalization to applicants, disregarding the agency’s previous concern to incentivize naturalization, in part, through affordability. The proposed fee increase is contrary to Congressional intent, and contrary to the interests of the United States society and economy.

The proposed USCIS fee schedule also eliminates the reduced fee option and the fee waiver for low-income and working-class immigrants. This change would make citizenship unattainable for many LPRs who are otherwise eligible to naturalize. Shutting out lower-income individuals from naturalizing would be an abrupt departure from existing practice, especially considering that an estimated 71 percent of those eligible to naturalize qualify for a waived or reduced fee for naturalization.⁵ In the fiscal year (FY) 2024, 14.3 percent of those who naturalized had an approved fee waiver, with individuals 65 and older having the most fee waivers out of all age groups.⁶ Given that older LPRs benefit from special rules permitting them to naturalize with a reduced need for English fluency, and with a simplified civics test, it is arbitrary to shut out this group from citizenship by making the cost of filing impossibly high.⁷ This arbitrary result is especially true given that there is no statutory or regulatory requirement that naturalization applicants prove income or that they demonstrate that they are not likely to become a public charge.⁸ Through this rule, USCIS is creating a financial substantive requirement to naturalize where Congress never intended for one to exist. Eliminating the reduced fee option and fee

¹ Karen Bennet, Bankrate, *Bankrate’s 2026 Annual Emergency Savings Report* (2026), <https://www.bankrate.com/banking/savings/emergency-savings-report/>.

² Center for Retirement at Boston College, *Immigrants’ Wealth Tied to Residency Status* (2021), <https://crr.bc.edu/immigrants-wealth-tied-to-residency-status/>.

³ H. Rep. No. 115-948 accompanying H.R. 6776, the Department of Homeland Security Appropriations Act (2019).

⁴ See, e.g., U.S. Citizenship and Immigration Services Fee Schedule, 75 Fed. Reg. 58,975, www.govinfo.gov/content/pkg/FR-2010-09-24/pdf/2010-23725.pdf.

⁵ Andrés Bautista, National Partnership for New Americans, *Over Two in Three Eligible-To-Naturalize Immigrants Now Qualify for Waived or Reduced Fee for Naturalization, New Data Finds* (April 16, 2024), <https://partnershipfornewamericans.org/over-two-in-three-eligible-to-naturalize-immigrants-now-qualify-for-waived-or-reduced-fee-for-naturalization-new-data-finds/>.

⁶ USCIS, *Naturalization Statistics* (2025), <https://www.uscis.gov/citizenship-resource-center/naturalization-statistics>.

⁷ 12 USCIS Policy Manual pt. E, ch. 1, § B (2026).

⁸ 12 USCIS Policy Manual pt. D, ch. 1, § B (2026).

waivers for naturalization applicants therefore favors plutocracy and is irrational in addition to undermining the will of Congress.

There are substantial economic benefits of naturalization to LPRs and to the U.S. economy. The earnings of noncitizens who naturalize increase by around 8.9 percent, contributing more to the tax base and increasing their spending power.⁹ Research suggests that naturalized citizens pay more in taxes per capita than native-born citizens.¹⁰

With approximately 7.4 million LPRs eligible to naturalize who have not yet filed,¹¹ and with the significant benefits that immigrant integration brings to the United States, it is in the country's best interests to incentivize naturalization by maintaining an affordable application fee and the availability of a fee waiver. Beyond economic gains, naturalization benefits LPRs and U.S. society by ensuring that long-term residents participate in our political system and nurture democratic principles, which in turn fuel our economy. "Citizenship can serve as a catalyst for immigrants to become more: dedicated to democratic principles; informed about the Constitution; engaged in political elections; represented in the political system; proficient in the English language; unified as families; employable in higher paying jobs; and integrated within a wider circle of people and institutions."¹²

USCIS has not used the filing fees applicants have already paid to USCIS efficiently, and applicants for naturalization must not be expected to bear a significant increase in fees without improvement in processing times, backlogs, and customer service.

Conclusion

For the reasons provided here, USCIS should promptly withdraw the provisions of its proposed fee schedule that would make naturalization less accessible to LPRs who seek to naturalize. Ultimately, this proposed USCIS fee schedule will serve only one intended purpose: to delay or prevent immigrants from naturalizing and thus keep LPRs who are otherwise eligible to naturalize vulnerable to the administration's continued attacks and attempts to strip immigrants of their legal status.

⁹ Karen Aho and Anna Shepperson, American Immigration Council, *Naturalization Helps Immigrants and the United States Reach Full Potential*, (Jan. 19, 2024), <https://www.americanimmigrationcouncil.org/blog/naturalization-helps-immigrants-reach-full-potential/>.

¹⁰ American Immigration Council, *Immigrants Pay their Fair Share* (May, 2, 2002), <https://www.americanimmigrationcouncil.org/fact-sheet/immigrants-pay-their-fair-share/>

¹¹ Karen Aho and Anna Shepperson, *Naturalization Helps Immigrants and the United States Reach Full Potential*, American Immigration Council (Jan. 19, 2024), <https://www.americanimmigrationcouncil.org/blog/naturalization-helps-immigrants-reach-full-potential/>.

¹² Jeff Chenoweth and Laura Burdick, Catholic Legal Immigration Network, *A More Perfect Union: A National Citizenship Plan*, at vii (Jan. 2007), <https://cliniclegal.org/resources/guides-reports-publications/more-perfect-union-national-citizenship-plan>.

Please do not hesitate to contact Michelle N. Méndez at michelle@nipnlg.org if you have any questions or need any further information.¹³

Respectfully,

A handwritten signature in black ink, appearing to read "Michelle Méndez", with a stylized flourish at the end.

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¹³ Victoria Neilson, Supervising Attorney, and Mariana Beyer Chapa, 2028 J.D. Candidate at Harvard Law School, authored this comment.