

March 13, 2023

**U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Ave. NW
Washington, DC 20529-2140**

Submitted via www.regulations.gov

Re: DHS CIS No. 2687-21 DHS Docket No. USCIS 2021-0010; Comments on the proposed rulemaking on the “U.S. Citizenship and Immigration Services Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements.”

We respectfully submit the comment letter below in response to the Department of Homeland Security’s (DHS) Notice of Proposed Rulemaking (NPRM), “U.S. Citizenship and Immigration Services Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements,” published on January 3, 2023:

UnidosUS, previously known as the National Council of La Raza, is the nation’s largest Hispanic civil rights and advocacy organization. Through its unique combination of expert research, advocacy, programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico, UnidosUS simultaneously challenges the social, economic, and political barriers to the success and well-being of Latinos at the national and local levels. For more than 50 years, UnidosUS has united communities and different groups seeking common ground through collaboration, and that share a desire to make our country stronger.

UnidosUS supports the Biden Administration’s demonstrated commitment to restoring trust in our legal immigration system by improving efficiencies of USCIS and promoting the inclusion of new Americans.¹ Nonetheless, we strongly oppose the increase in application fees for this proposed schedule, particularly those that impede naturalization and family-based immigration. These anticipated fees would only add to the numerous existing barriers precluding low-income immigrant families from integrating into the American social fabric.

Although 8 out of 10 Latinos are U.S. citizens, a third of them are naturalized citizens.² The increased fees for adjustments applications would deprive Latino immigrants of the opportunity to realize their full potential as new Americans. As the president’s newly released second Executive Order on racial equity states, “members of underserved communities—many of whom have endured generations of discrimination and disinvestment—still confront significant barriers to realizing the full promise of our great Nation, and the Federal Government has a responsibility to remove these barriers.”³

Accordingly, UnidosUS urges USCIS to withdraw from the proposed fee schedule the provisions that increase the cost of naturalization and effectively constrain family-based immigration and naturalization. In addition, we urge USCIS to expand fee waiver eligibility for low-income immigrants and similarly vulnerable populations. We also ask USCIS to modernize its funding structure and find alternative ways to finance the process, those that do not rely on fees. The finalized USCIS fee schedule should be reflective of the Biden Administration's promise and reinvigorated efforts to welcome new Americans: "The Federal Government should develop welcoming strategies that promote integration, inclusion, and citizenship, and it should embrace the full participation of the newest Americans in our democracy."⁴

I. The State of Low-Income Immigrants

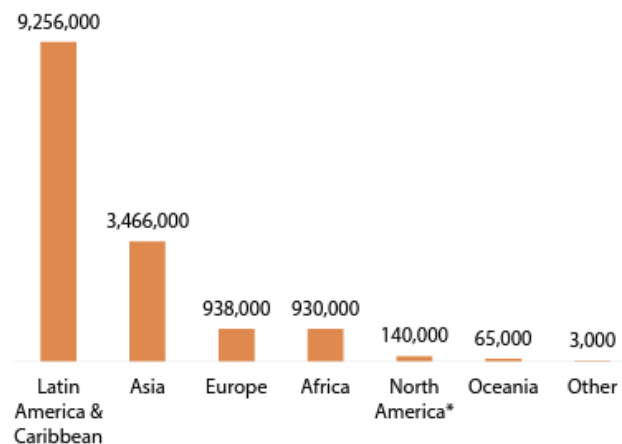
Working-class immigrants, regardless of legal status, buttress the nation's economy. Particularly during times of crises and hardship, as witnessed during the COVID-19 pandemic, they rose to the occasion, working on the frontlines and doing the essential work to provide fellow Americans with food and other necessities like childcare. By some estimates, 5.5 million undocumented immigrants are considered essential workers.⁵ These jobs, despite their importance, often provide meager pay: essential workers comprise nearly half of all people in occupations with a median wage of less than \$15 per hour, with over 20% of them Latino.⁶ For those immigrant essential workers with an existing pathway to citizenship, their economic potential is blocked by their inability to afford the high cost of applying for legal status. This systemic barrier impacts both low-income and Latino immigrants.

Many immigrants arrive with hopes of achieving the American Dream and reaching a level of economic livelihood unattainable in their country of origin. Despite these hopes, many immigrants continue to struggle financially while living in the U.S. Approximately 10.3 billion immigrants in the U.S. in 2019 had a family income below 150% of the Federal Poverty Guidelines.⁷ Legal permanent residents and undocumented immigrants each comprise one-third of this low-income population. With the majority of full-time employed low-income immigrants of prime-working age (i.e., 25 to 54 years old) earning less than \$25,000 annually, the reality is that most low-income immigrants cannot easily save for expenses outside of daily living, including the cost of immigration applications.⁸ The cost of immigration applications for benefits such as green cards, work permits, and citizenship can amount to a sizable portion of a low-income immigrants' income. For some, the cost is prohibitive and effectively bars them from legal status.

Latino immigrants comprise nearly half of foreign-born U.S. residents and typically have lower incomes than immigrants from other ethnic backgrounds, as observed by a University of Southern California study.⁹ The most common region of origin of low-income immigrants in the U.S. is Latin America and the Caribbean. In 2019, 9,256,000—63%—of low-income immigrants were from this region.¹⁰ Immigrants from Mexico and Central America report average incomes of approximately \$45,500 for a 3.5- person family household, which is just over 200% of the Federal Poverty Guidelines.¹¹ These incomes scarcely and oftentimes do not suffice for these individuals’ day-to-day lives, let alone affording the cost of immigration application fees. Therefore, we encourage USCIS to create a finalized fee schedule that reflects and respects the economic reality of low-income immigrants and the many Latinos comprising that population.

Figure 1.

World Region of Birth of Low-Income Immigrants in the United States, 2019



* In this figure, North America is comprised of Canada and Bermuda. Mexico is included in Latin America and Caribbean. Source: MPI analysis of data from the U.S. Census Bureau 2019 ACS.

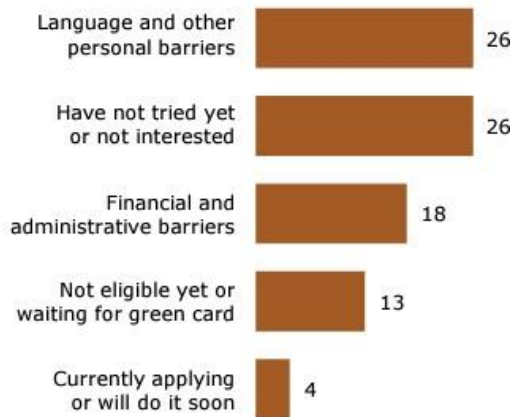
II. The Threat of Increased Application Fees

According to DHS, as of September 2022, 9.2 million—or over 70%—of legal permanent residents in the U.S. are potentially eligible to naturalize.¹² Similar to previous years, Latinos are overrepresented in this segment. Nearly 30% of eligible-to-naturalize LPRs were from Mexico, more than any other country. Other Latin American countries were within the top 20 countries with the most LPRs eligible to naturalize: Cuba, Dominican Republic, El Salvador, Colombia, and Guatemala (in descending order).¹³ The naturalization of these individuals, including Latino LPRs, is in the best interests of the United States: Naturalization improves workforce productivity and catalyzes economic growth by increasing labor market mobility and investing in human capital.¹⁴ These benefits are not only felt amongst new Americans but also improve their communities: A path to naturalization for undocumented immigrants would increase GDP by \$1.7 trillion over the next 10 years and create 438,000 new jobs for the American economy.¹⁵

Figure 2.

What Is the Main Reason You Have Not Yet Naturalized?

(% of Latino legal permanent residents who say ...)



Notes: Based on foreign-born Latino legal permanent residents who say they would like to naturalize (n=243). Other reasons, "Don't know" and "Refused" answers not shown.

Source: Pew Hispanic Center, 2012 National Survey of Latinos

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Increased fees for naturalization and other immigration applications, such as those in the recently proposed fee schedule by USCIS, actively discourage the citizenship and integration of the many long-residing and qualifying Latino immigrants who are already contributing to our nation. Various studies explicitly identify financial costs as a deterrent to Latino permanent residents naturalizing, including an UnidosUS study of Latinos in California that found that “the financial cost of naturalizing was identified as the major reason immigrants who were eligible to naturalize had not yet done so.”¹⁶ A nationwide survey organized by the Pew Hispanic Center showed that 93% of Latinos would have naturalized already if they could.¹⁷ Only 13% of participants attributed the cause to ineligibility or waiting for their green card, while nearly one-third of Latinos attributed their inaction to financial barriers.¹⁸ Data supports the provision of fee waivers to overcome this barrier for lower-income communities: A study conducted by the Stanford Immigration Policy Lab

demonstrated that the fee vouchers that covered the full cost of naturalization applications doubled the rates of submissions among applicants, particularly Spanish-speaking individuals.¹⁹

UnidosUS highlights the following application increases as a particular threat to citizenship integration and family unity of low-income and Latino immigrants already residing across the United States:

- N-400, Application for Naturalization: If the proposed cost is finalized by USCIS, the cost of this application will increase by 19% from \$640 to \$760. Additionally, by ‘bundling’ the fees for the application and the biometrics, elderly applicants who were previously exempt from the biometrics fee would see an even more significant application increase.
- I-485, Application to Register Permanent Residence or Adjust Status: If the proposed cost is finalized by USCIS, the cost of this application will increase by 105% from \$750 to \$1,540.
- I-601A, Application for Provisional Unlawful Presence Waiver: The creation of this waiver in 2013 incentivized eligible immigrants to secure green cards by ensuring that they would not be separated from their U.S.-residing family members during the process, thereby encouraging trust in our nation’s legal immigration system. The proposed increased cost in this application by 75% from \$630 to \$1,105.

- I-130, Petition for Alien Relative: This proposed cost increase further exacerbates the socioeconomic disparity between eligible-to-naturalize LPRs, by establishing a price differential between applications submitted via paper and via the online application portal. Consequently, the proposed cost hike would entail respective increases of 33% and 55%, as the I-130 would go from \$535 to \$710 and \$820.

Several of these fee changes may appear small to some. However, collectively, they can present a burdensome cost to many low-income immigrants. For example, under the proposed fee schedule, a family of four could pay up to \$7,460 for green cards and work permits—a staggering increase from the current cost of \$3,950.²⁰ These increased application costs are associated with a decline in the naturalization of less-formally-educated—and likely lower-income—immigrants, increasing existing inequalities within this system.²¹ Other changes new to the USCIS fee schedule, such as the price differential for paper and online applications, are additional inadvertent ways of decreasing accessibility.

USCIS frames the price differential to incentivize the use of its online portal, thereby supporting the agency’s effort to digitize and streamline its workflow.²² Nonetheless, it arguably discriminates against lower-income applicants for various reasons. Firstly, applicants who submit Form I-912 to request a fee waiver must submit said waiver and the corresponding application all on paper, thereby limiting their ability to make use of the online discount if they are approved for the waiver. Moreover, paper submissions are more likely to be a common practice for those who lack a reliable internet connection and sufficient technical and administrative literacy—a circumstance that disproportionately affects lower-income applicants. A recent study shows that, of the 16% of Latinos in the U.S. that lacked internet access in 2016, 77% were Latino immigrants. This technological limitation likely impacts those Latino immigrants who are applying for residency or citizenship.²³

These steep increases in application costs represent USCIS’s long history of fee hikes and ignore repeated recommendations that USCIS should consider a limit on fees or a lower fee for families submitting multiple applications.

Figure 3. Selected Historical Immigration Services Application Fees.

Form	FY 1994	FY 1999	% Diff	FY 2002	FY 2004	% Diff	FY 2006	FY 2007	% Diff	FY 2007	FY 2011	% Diff
I-90	\$75	\$110	47%	\$130	\$185	42%	\$190	\$290	53%	\$290	\$365	26%
I-129	\$75	\$110	47%	\$130	\$185	42%	\$190	\$320	68%	\$320	\$325	2%
I-130	\$80	\$110	38%	\$130	\$185	42%	\$190	\$355	87%	\$355	\$420	18%
I-485	\$130	\$220	69%	\$255	\$315	24%	\$325	\$930	186%	\$930	\$985	6%
I-765	\$70	\$100	43%	\$120	\$175	46%	\$180	\$340	89%	\$340	\$380	12%
N-400	\$95	\$225	137%	\$260	\$320	23%	\$330	\$595	80%	\$595	\$595	0%

Source: For FY 1994 to FY 2011, Congressional Research Service U.S. Citizenship and Immigration Services’ Immigration Fees and Adjudication Costs: Proposed Adjustments, and Historical Context, for FY 2011.

<http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnextoid=5be73dc5cb93b210VgnVCM100000082ca60aRCRD&vgnextchannel=5b33aca797e63110V>

The graph above documents the increasing fees of various immigration services applications, including the N-400 and I-485, from FY 1994 to FY 2011.²⁴ Notable fee schedule increases occurred in 1998 and 2007, both coinciding with moments of pivotal changes in the national landscape. In 1986, the Immigration Reform and Control Act was passed, which granted amnesty—specifically in the form of legal

permanent residency—to 2.7 million undocumented immigrants. Those granted amnesty were eligible for naturalization starting in 1993, contributing to a spike in N-400 application submissions throughout the mid-to late-1990s. This spike in individuals applying for legal permanent residency aligned with a 137% price increase in the N-400 from FY 1994 to FY 1999 (i.e., from \$95 to \$225). In 2007, we witnessed the beginning of the Great Recession, which corresponded with a price increase in numerous immigration service applications. While the N-400 saw an 80% increase from \$330 to \$595, the I-485 saw the biggest jump, an 186% increase from \$325 to \$930. The current proposed fee schedule can be contextualized within this upward trend in application costs: The COVID-19 pandemic led to a drop in USCIS revenue and, consequently, a swelling number of backlogged applications. Now, to clear this backlog, applicants are being asked to increase the agency’s revenue and help it recover from this crisis.

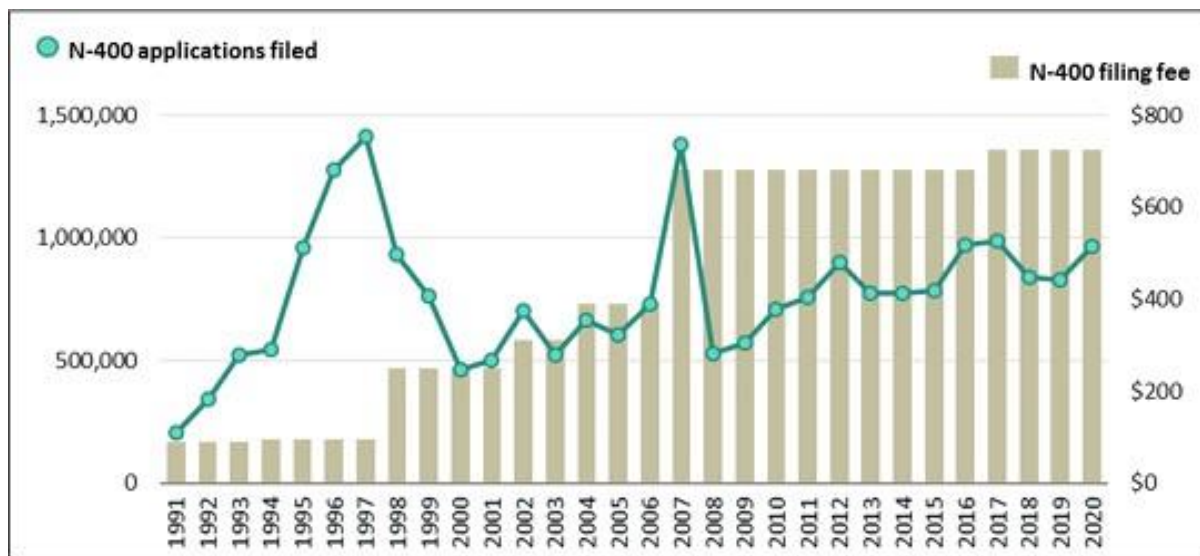
Figure 4. Data on Applications for N-400 and All Other Services, FY 1998–FY 2009.

Fiscal Year	N-400 Applications	Percent Change	All Other Applications	Percent Change
1998	932,957		3,598,745	
1999	765,346	-18.0%	3,769,592	4.7%
2000	460,916	-39.8%	5,022,876	33.2%
2001	501,646	8.8%	6,831,692	36.0%
2002	700,649	39.7%	5,623,847	-17.7%
2003	523,370	-25.3%	5,896,248	4.8%
2004	662,794	26.6%	4,591,050	-22.1%
2005	602,972	-9.0%	5,006,985	9.1%
2006	730,642	21.2%	4,908,031	-2.0%
2007	1,382,993	89.3%	4,913,437	0.1%
2008	525,786	-62.0%	3,960,777	-19.4%
2009	570,442	8.5%	4,591,522	15.9%

Source: Congressional Research Service

Figures 4 and 5 show that these fee schedule changes had a dramatic impact on the submissions of N-400 applications. As the chart and graph below indicate, fee increases in 1998, 2002, 2004, 2007, and 2017 were immediately preceded by greater volume in N-400 applications—an expected response of eligible-to-naturalize immigrants wanting to submit their materials before prices increased.²⁵ This upturn was routinely followed by a subsequent year with, sometimes precipitous, declines in application volumes—the likely inability and unwillingness of applicants to pay so much more for these critical applications.²⁶ As USCIS proposes this latest fee schedule, two issues are of concern for UnidosUS: (1) USCIS application fees continue to increase over time, and there’s no stopgap or ceiling in mind to maintain the affordability of these benefits, and (2) fee schedules have increased the most in political moments when immigrants could most benefit most from the security conferred by legal status.

Figure 5. N-400 Naturalization Application Volume and Fees, FY 1991–FY 2020.



Source: CRS analysis of USCIS data and Office of Immigration Statistics data.

Notes: Fee totals include fees for biometrics, which began in FY1998. USCIS proposed a fee increase for FY2020, but it was not implemented.

III. Harmful Responses to Increased Application Fees

The decreasing affordability of USCIS applications may drive lower-income immigrants to various risky methods to apply for these critical legal benefits. Immigrants should not be preparing applications *pro se* (i.e., sans attorney support) solely because they cannot afford qualified legal assistance and rely on predatory payday lenders to cover application fees. These desperate actions could backfire and harm the financial and legal stability of immigrants and their families. When fee applications become unaffordable, it can push already financially vulnerable families into higher cost and higher risk financial products.

One of the more commonplace traps lower-income immigrants fall into when filing USCIS immigration applications is taking out a loan from a payday lender. Lower-income Latino immigrants are particularly vulnerable to payday lenders. Disproportionally unbanked, lacking a traditional and stable credit history, and owning typically few assets, many Latinos immigrants do not have the financial security to comfortably cover the costs of applications for residency, naturalization, and other benefits.²⁷ Although these payday lenders may be offering a seemingly efficient solution to their stress, these companies are reported to target Black and Latino communities with egregiously high-interest rates—at times, even up to 400%.²⁸ Even when a lower-income Latino immigrant is approved for residency and citizenship, they may be unable to glean the financial benefits granted by legal status because they are too overwhelmed paying off spiraling debt.

Low-income immigrants could also find themselves forced to forego legal support in order to pay USCIS application fees. Although these applications can be completed *pro se*, this can increase an applicant’s

chance of receiving a rejection on the basis of technical errors and a less compelling depiction of the applicant's case. This could also result in more costs overall for applicants that have to resubmit their adjusted materials to USCIS for reconsideration.

IV. Fee Waivers and Exemptions Must be Strengthened and Expanded

UnidosUS acknowledges USCIS's continued maintenance of its fee waiver and exemption programs, a notable effort to increase affordability of certain benefits to more vulnerable applicants. Nonetheless, these programs should be strengthened and expanded even further, particularly in support of naturalization and family-based immigration. USCIS expects more than one million applicants—about an eighth of the total pool—will benefit from fee exemptions or fee waivers each year. However, this projection does not reflect the nuanced financial reality and obligations of lower-income immigrants, who may not always meet the threshold exactly as it is stipulated in waiver and exemption requirements.

We praise USCIS for adding additional fee exemptions for certain humanitarian programs. However, we urge them to withdraw the proposed provision to remove exemptions that are based solely on the age of the person submitting the request. This provision places an additional and undue financial burden on low-income immigrant parents of young children and low-income adult children of immigrant parents who act as their caretakers.

The proposed fee schedule does not alter fee waiver eligibility and maintains the 2011 Fee Waiver Policy criteria. These criteria grant waivers to applicants who receive public benefits, have income at or below 150% of the Federal Poverty Guidelines, or who demonstrate a financial hardship. We urge USCIS to make the following changes to the eligibility criteria:

- Expand evidence for receipt of means-tested benefits to include a benefits card, in lieu of the current requirements, which request a formal letter, notice, or other official documents.²⁹ This change in receipt requirements, by allowing the presentation of benefits cards that individuals have ready access to, would alleviate the administrative burden to those who would have to otherwise spend hours struggling on the phone or at agency offices in an attempt to receive a formal notice of receipt.
- Raise the threshold for household income for full fee waivers from 150% to 200% of the Federal Poverty Guidelines. This expansion would impact a significant portion of the community of low-income immigrants. In 2019, immigrants who were at 150% to 199% of the federal poverty level comprised one-third, or 4,503,000, of all low-income immigrants in the country.

V. Request to Withdraw the Fee Schedule Rule from the Trump Administration

We request that USCIS formally withdraw the 2020 USCIS Fee Schedule and Immigration Benefit Request Requirements (CIS No. 2627-18; DHS Docket No. USCIS-2019-0010, Aug. 3, 2020) (the “2020 Fee Schedule”). The 2020 Fee Schedule never went into effect because it has been subject to a preliminary injunction issued in *ILRC v Wolf*, Case No. 20-cv-05883-JSW (N.D. Cal., Sept. 29, 2020).

However, USCIS has never formally withdrawn the 2020 Fee Schedule, and there is no final judgment in the *ILRC v. Wolf* matter, which has been stayed in court pending the results of the current proposal. Moreover, the current proposal appropriately removes many of the objectionable features contained in the 2020 Fee Schedule, such as the unprecedented new fee for asylum applications and the elimination or restriction of fee waivers.

The current proposal reflects a considered policy judgment on the part of USCIS that those features of the 2020 Fee Schedule are undesirable as a policy matter and are inconsistent with the goals of the federal immigration laws. However, we anticipate that the current fee proposal will also be subject to judicial review after it is adopted. If, for any reason, a court were to find that some portion of the new fee proposal is unlawful, the result should not be a return to the 2020 Fee Schedule. Rather, by formally withdrawing the 2020 Fee Schedule, USCIS can ensure that the result would be a return to the current status quo, which is the 2016 Fee Schedule now in effect. Also, USCIS should state that its withdrawal of the 2020 Fee Schedule is severable from the remainder of the current proposal so that any judicial invalidation of any portion of the current proposal would not endanger the lawful and appropriate decision to withdraw the 2020 Fee Schedule.

VI. Conclusion—USCIS’s Financial Model Must be Modernized

To address how rising fees put citizenship and naturalization out of reach for many eligible immigrants, USCIS must explore ways of streamlining their processes and eliminating redundancies. For example, reducing the length of forms would decrease the amount of time adjudicators spend on applications. In a report published in December 2022, USCIS stated that it will be simplifying several major forms, including the I-765, I-485, and N-400.³⁰ We welcome streamlined, shortened forms that will increase efficiencies and, thus, negate some of the need for increasing fees. The rate of naturalization-eligible immigrants continues to increase, and USCIS should not neglect this opportunity to assist 9.2 million LPRs in integrating further into the American social fabric by becoming U.S. citizens. The long-term benefits of this integration, for both immigrants and the nation, are unmistakable.

We urge USCIS to withdraw the provisions of the proposed fee schedule that target low-income families. USCIS has not used the filing fees applicants have already paid to USCIS efficiently, and these customers must not be expected to bear a significant increase in fees, especially absent improvement in processing times, backlogs, and customer service. Perhaps more importantly, our government would be hindering immigrant integration and, in turn, the social and economic benefits of integration by making it harder and more expensive to apply for immigration status and citizenship.

Should you have any questions regarding these comments, please contact Nicole Chavez at nchavez@unidosus.org.

Sincerely,



Eric Rodriguez
Senior Vice President, Policy and Advocacy
UnidosUS

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- ¹ Exec. Order No. 14012: Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans, 86 FR 8277 (February 2, 2021). <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/02/02/executive-order-restoring-faith-in-our-legal-immigration-systems-and-strengthening-integration-and-inclusion-efforts-for-new-americans/>.
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 - ⁴ Exec. Order No. 14012.
 - ⁵ Chavez, Nicole. "We can't wait: Essential workers need a path to citizenship." *UnidosUS Blog*. 2 June 2021. <https://unidosus.org/blog/2021/06/02/we-cant-wait-essential-workers-need-a-path-to-citizenship/>.
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 - ¹¹ Terry, Sabrina. "Citizenship, an Essential Step to Building Wealth." *UnidosUS Blog*. 13 September 2016. <https://unidosus.org/blog/2016/09/13/citizenship-essential-step-building-wealth/>.
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