

August 21, 2026

Andrew Good
Chief, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Submitted via www.regulations.gov

Re: Public Comment on Notice of Proposed Rulemaking, Naturalization Application Fee Adjustments, DHS Docket No. USCIS-2026-0265; CIS No. 2834-25; RIN 1615-AD08, 8 CFR Part 106, 241, and 247a (June 23, 2026)

Dear Chief Good:

UnidosUS respectfully submits this comment in response to the Department of Homeland Security's ("DHS") U.S. Citizenship and Immigration Services ("USCIS") request for public comment on the Notice of Proposed Rulemaking ("NPRM"), *Naturalization Application Fee Adjustments*, dated June 23, 2026.

UnidosUS writes to express its opposition to the proposed rule and urges DHS to withdraw it. The proposed increases to naturalization filing fees, combined with the elimination of the reduced-fee option and fee waivers, would make U.S. citizenship substantially less accessible to many lawful permanent residents who are otherwise eligible to naturalize. These changes are particularly concerning for low-income applicants, for whom the cost of applying can determine whether U.S. citizenship is realistically within reach.

UnidosUS is a nonprofit, nonpartisan organization that serves as the nation's largest Hispanic civil rights and advocacy organization. Since 1968, we have built a stronger America by creating opportunities for Latinos and breaking down barriers to expand economic and social progress for all. UnidosUS partners with an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico.

Our extensive work on naturalization, including research, advocacy, and work with community partners gives us particular insight into the importance of keeping naturalization accessible and affordable for eligible permanent residents. Fifty-four UnidosUS Affiliates provide immigration legal services, and among their services is assistance with naturalization applications, while several others offer English and civics classes to assist eligible permanent residents in preparing to fulfill the requirements for naturalization. These organizations work directly with eligible lawful permanent residents navigating the naturalization process, including applicants who need assistance understanding and obtaining fee waivers or reduced fees.

UnidosUS has long advocated for an affordable and accessible path to citizenship because of the benefits that naturalization confers on individuals, communities, and our country as a whole. For example, a 2012 study found that naturalization can boost individual earnings by 8 to 11 percent, leading to a potential \$21-45 billion increase in cumulative earnings over ten years that will have ripple effects on the national economy.¹ Together with our Affiliates and partners, we have supported investments in citizenship application assistance, strengthened immigration legal services, and advocated for policies that help eligible lawful permanent residents complete the naturalization process.

Our experience is straightforward: cost matters and high costs are a barrier. An analysis of a 2007 national campaign to promote naturalization among eligible permanent residents found that high fees were a significant factor among those who delayed pursuing U.S. citizenship.² In a 2013 survey of Latinos in California, we found that for those who reported themselves as eligible to naturalize, half reported that cost was the major reason for not applying for citizenship.³

UnidosUS Affiliates regularly work with lawful permanent residents who are eligible for naturalization but struggle to afford the cost of applying. For many of the individuals and families they serve, the filing fee must be weighed against rent, groceries, childcare, transportation, medical expenses, and other basic household needs. Under the proposed rule, an applicant who currently qualifies for a full fee waiver could instead face a \$1,280 filing fee for an online N-400. For a family already making difficult choices about how to meet its basic needs, that amount can make citizenship unattainable rather than merely delayed.

The Proposed Rule Would Make Naturalization Significantly More Expensive, Detering Eligible Permanent Residents from Applying

The NPRM proposes to increase the N-400 filing fee from the current \$760 to \$1,330 for paper filings and from \$710 to \$1,280 for online filings. This represents increases of approximately 75% and 80%, respectively. The proposed N-336 fee would increase from \$830 to \$1,475 for paper filings and from \$780 to \$1,425 for online filings.⁴ The proposal would also require all applicants (except military service members) to pay the new substantially increased filing fees by eliminating the reduced-fee option for N-400 applicants with household incomes at or below 400% of the Federal Poverty Guidelines and eliminate fee waivers for both N-400 and N-336 applicants.⁵ These changes would substantially increase the cost of naturalization for applicants who currently rely on fee waivers or the reduced-fee option to make the application affordable.

¹ "Citizen Gain: The Economic Benefits of Naturalization for Immigrants and the Economy." Center for the Study of Immigrant Integration (CSII) at USC. <https://dornsife.usc.edu/csii/citizen-gain/>

² *Catalyst and Barriers to Attaining Citizenship*, 2010 <https://unidosus.org/wp-content/uploads/2021/07/catalystsandbarrierstoattainingcitizenship.pdf>

³ *Latino Financial Access and Inclusion in California* https://unidosus.org/wp-content/uploads/2021/07/CA_Latino_Financial_Access_ReportWeb.pdf

⁴ 91 Fed. Reg. 37,500, 37,502-03 (June 23, 2026).

⁵ Id. at 37,503, 37,536.

For many eligible lawful permanent residents, the cost of applying for naturalization would become a significant financial barrier and, in some cases, the sole obstacle preventing them from obtaining U.S. citizenship despite otherwise meeting all statutory eligibility requirements.

We are particularly concerned by DHS's treatment of the likely effect of these fee increases on naturalization applications. The NPRM acknowledges that higher fees and the elimination of fee relief may cause some eligible applicants to delay applying.⁶ At the same time, DHS characterizes naturalization as an "inelastic" good and concludes that most applicants will ultimately pay the higher fee rather than abandoning their applications.⁷ That conclusion is not supported by evidence.

The NPRM acknowledges that fee waivers currently assist applicants who demonstrate an inability to pay through one of three criteria: receipt of a means-tested benefit, household income at or below 150% of the Federal Poverty Guidelines, or extreme financial hardship.⁸ USCIS estimates that approximately 136,000 to 157,000 non-military N-400 applicants per year received fee waivers during the periods it analyzed.⁹ These are applicants whom USCIS has determined, under its existing rules, cannot reasonably afford the filing fee.

The reduced-fee option has also been used by a meaningful number of applicants since its expansion in 2024. USCIS reports that reduced-fee N-400 filings represented 3.2% of all N-400 receipts during the year following the 2024 rule's effective date, compared with an average of just 0.3% during FY 2019-2023.¹⁰ The increase suggests that the expanded reduced-fee option was reaching applicants who otherwise faced meaningful financial barriers to naturalization. DHS should not respond to that evidence by eliminating the filing fee assistance altogether. In addition to our own research cited above, a randomized controlled study of low-income immigrants found that offering a voucher covering the naturalization application fee produced a 41-percentage point increase, roughly doubling the rate of applications.¹¹

The NPRM Has Not Adequately Explained Its Change in Approach to Naturalization Fees

UnidosUS recognizes that DHS must consider the costs of administering immigration benefits and has authority to establish fees. However, the agency is using the fee review process to fundamentally change how it treats naturalization without adequately explaining why the policies it adopted only recently are no longer appropriate.

The NPRM expressly acknowledges that previous fee rules treated naturalization differently from other immigration benefits. DHS states that the 2010, 2016, and 2024 fee rules kept naturalization fees below

⁶ 91 Fed. Reg. 37,503, 37,539.

⁷ Id. at 37,543.

⁸ 91 Fed. Reg. 37,507-08.

⁹ Id. at 37,535.

¹⁰ Id. at 37,509-10.

¹¹ Jens Hainmueller et al., *A Randomized Controlled Design Reveals Barriers to Citizenship for Low-Income Immigrants*, 115 Proc. Nat'l Acad. Sci. 939, 939-44 (2018). <https://pubmed.ncbi.nlm.nih.gov/29339470/>

USCIS' estimated costs because of the unique nature of naturalization, its significant public benefits to the U.S., and the nation's tradition of welcoming new citizens.¹²

The 2024 rule went further by expanding reduced-fee eligibility after receiving public comments and stakeholder feedback concerning affordability and the benefits of naturalization.¹³ The rule explained that naturalization produces benefits including increased civic involvement and tax revenues and that reduced fees could provide relief to longtime eligible residents who struggled to afford the cost of applying.¹⁴

The current NPRM now reaches the opposite conclusion: it proposes that naturalization applicants bear the full cost of adjudication and rejects the view that the broader public benefits of citizenship justify setting naturalization fees below the cost of adjudication.¹⁵ DHS is entitled to reconsider its policies. However, when an agency changes course on a policy that affects large numbers of applicants, it should explain why the considerations that previously supported a different approach no longer apply. In this case, the NPRM does not adequately explain why the public benefits of naturalization that DHS and USCIS recognized in prior rulemaking should no longer be reflected in the agency's approach to setting naturalization fees.

DHS should also explain why the interests of low-income applicants are no longer sufficient to justify maintaining fee waivers and reduced fees, particularly when the agency itself recognizes that these mechanisms are specifically intended to address applicants' inability to pay.

The Proposed Rule Would Compound Other Barriers to Naturalization

The proposed fee changes also come at a time when the naturalization process has become more demanding in other ways. Since January 2025, USCIS has made or announced several changes affecting naturalization, including changes to the civics test and good moral character standards and the resumption of neighborhood investigations. These changes have increased the amount of preparation, documentation, and scrutiny that many applicants may encounter.

At the same time, the agency terminated the Citizenship and Integration Grant Program, which had supported community-based organizations providing citizenship preparation and naturalization application assistance. The program grantees, which included libraries, community colleges, and community-based organizations, help eligible lawful permanent residents understand the requirements, prepare applications, determine whether they qualify for fee relief, and navigate an increasingly complicated process.

When government policies make naturalization more difficult while simultaneously reducing the resources available to community organizations and eliminating financial assistance for applicants, the barriers compound. DHS should consider the proposed fees in that broader context rather than treating the filing fee as an isolated cost.

¹² Id. at 37,508

¹³ Id. at 37,509.

¹⁴ Id.

¹⁵ Id. at 37,516-17.

Naturalization is not simply another administrative transaction. There has long existed bipartisan support for a process through which eligible lawful permanent residents become full participants in the civic life of the country where they have built their lives. U.S. Citizenship provides important rights and responsibilities and can strengthen civic participation, economic opportunity, and family stability. USCIS itself has previously recognized that naturalization provides significant benefits to the United States, including increased civic involvement and tax revenues.¹⁶

For these reasons, UnidosUS respectfully urges DHS to withdraw the proposed rule. Should you have any questions or need additional information, contact Laura Vazquez at lvazquez@unidosus.org.

Respectfully,

Laura Vazquez
Director of Immigrant Integration
UnidosUS

¹⁶ 89 Fed. Reg. 6,194, 6,236, 6,301 (Jan. 31, 2024).