



State of Rhode Island
Office of the General Treasurer

James A. Diossa
General Treasurer

March 13, 2023

Submitted via Federal eRulemaking Portal

Samantha L. 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 20529-2140

RE: DHS Docket No. USCIS 2021-0010; RIN 1615-AC68 U.S. Citizenship and Immigration Services Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements

Dear Chief Deshommes:

I write in response to U.S. Citizenship and Immigration Services' (USCIS) notice of a proposed fee schedule and changes to certain other immigration benefit request requirements ("Proposed Rule" or "Proposed Fee Schedule"). In particular, I write to express concerns about the proposed increases in the naturalization services fees.

As the first Latino Treasurer of the State of Rhode Island and former mayor of a predominantly immigrant community, I have witnessed both the personal and economic value that naturalization has to my state. I have heard from thousands of Rhode Islanders who have had obstacles in applying for naturalization due to the long processing times, the financial and personal costs involved, and the complexity of the immigration system.

The Proposed Fee Schedule would increase the cost of filing Form N-400, Application for Naturalization, for most applicants from \$725 to \$760; for elderly applicants who do not need to provide biometrics for the naturalization application, the increase would be even greater—from \$640 to \$760. In addition, while I note that that for most applicants, the Reduced Fee for the Form N-400 would decrease from \$405 to \$380, for elderly applicants who do not need to provide biometrics, this fee would increase from \$320 to \$380.

I am greatly concerned about the impact of the foregoing increases on Latino lawful permanent residents who wish to pursue their dream of U.S. citizenship, particularly for elderly naturalization applicants. Additionally, I strongly oppose the proposed increase in the cost of Forms N-600 and 600K, the applications frequently used by parents to obtain documentation of their children's U.S. citizenship status. The fees for these applications would increase from \$1,170 to \$1,385, an 18 percent increase. The existing fees are already too high, and do not seem warranted for the many cases where determining whether the certificate should be issued appears to be a relatively simple process. The increase would impose even greater burdens on parents seeking these documents.

Ultimately, I urge USCIS to ensure that naturalization is accessible and affordable for our nation's lawful permanent residents, and I urge you to take these comments into account as you move to finalize the fee schedule. If you require further information, please do not hesitate to contact me. Thank you for the opportunity to submit comments on the proposed naturalization fee increases.

Sincerely,

A handwritten signature in blue ink, appearing to be 'JD' with a stylized flourish extending downwards and to the right.

James A. Diossa
Rhode Island General Treasurer