

# PRICED OUT OF CITIZENSHIP

MUNICIPAL STRATEGIES TO REDUCE THE FINANCIAL BARRIERS TO  
U.S. CITIZENSHIP IN LIGHT OF NEW FEE INCREASES

## NEW RULE INCREASING U.S. CITIZENSHIP APPLICATION FEES

### WHAT HAPPENED?

On August 3, 2020, the proposed rule on U.S. Citizenship and Immigration Services (USCIS) Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements became final.

### WHAT CITIZENSHIP-SPECIFIC CHANGES ARE SET TO BE IMPLEMENTED UNDER THE NEW RULE?

The final fee rule drastically increases the citizenship application filing fee and eliminates fee waivers and reduced fees. The rule also increases other immigration application fees while significantly curtailing the availability of fee waivers, making the long, multi-step pathway to citizenship even more financially burdensome.

- The rule increases the citizenship application fee from \$725<sup>1</sup> to \$1,170 for paper submissions and \$1,160 for online submissions—with an additional \$30 biometrics fee in some cases.
- The rule eliminates fee waivers and reduced fees. Approximately 40% of citizenship applicants requested a fee waiver in 2017,<sup>3</sup> while many others qualified for the reduced fee of \$405.<sup>4</sup>

### WHEN WILL THE NEW RULE TAKE EFFECT?

The rule is set to take effect on October 2, 2020. Legal challenges may affect implementation.

<sup>1</sup> The total fee includes a \$85 biometric fee applicable to those under 75 years of age. Therefore, for applicants 75 or older, the fee is \$640. There is no fee for some military applicants. See “N-400, Application for Naturalization,” U.S. Citizenship and Immigration Services, *available at* <https://www.uscis.gov/n-400>.

<sup>2</sup> Department of Homeland Security, “U.S. Citizenship and Immigration Services Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements,” 85 FR 46788 (Aug. 3, 2020), *available at* <https://www.federalregister.gov/documents/2020/08/03/2020-16389/us-citizenship-and-immigration-services-fee-schedule-and-changes-to-certain-other-immigration>.

<sup>3</sup> Melissa Cruz, “USCIS Changes Policy on Fee Waivers, Potentially Deterring Thousands of Citizenship Applications,” Immigration Impact (Oct. 30, 2019), *available at* [https://immigrationimpact.com/2019/10/30/uscis-changes-fee-waivers-policy/#.Xl1reC2ZM\\_U](https://immigrationimpact.com/2019/10/30/uscis-changes-fee-waivers-policy/#.Xl1reC2ZM_U).

<sup>4</sup> The reduced fee includes a \$85 biometric fee applicable to those under 75 years of age. Therefore, for applicants 75 or older, the reduced fee is \$320. See “N-942, Request for Reduced Fee,” U.S. Citizenship and Immigration Services, *available at* <https://www.uscis.gov/i-942>.

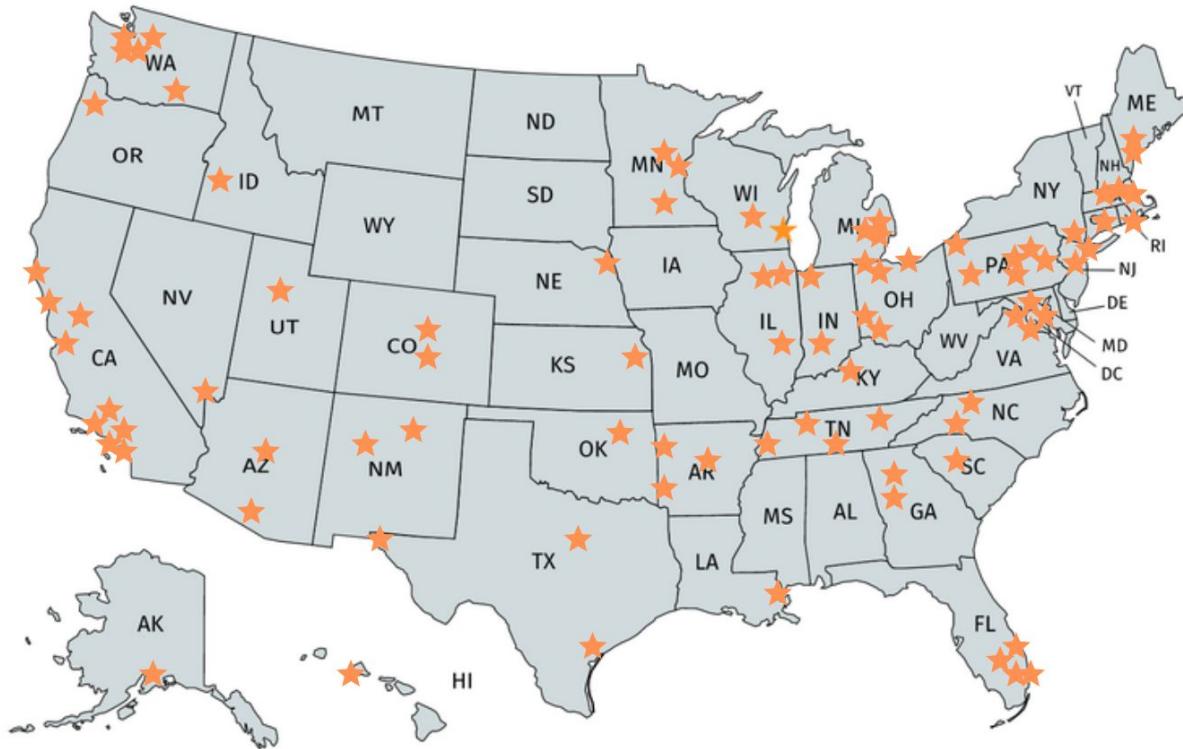
# OUR COMMITMENT TO CITIZENSHIP

Cities for Citizenship (C4C) is a growing national initiative of 93 cities and counties aimed at increasing citizenship among eligible U.S. permanent residents and encouraging localities across the country to invest in citizenship programs. It is chaired by the mayors of New York City, Chicago and Los Angeles with support from the Center for Popular Democracy and the National Partnership for New Americans. Citi is the Founding Corporate Partner.

There are currently over 9 million lawful permanent residents (LPR's) in the United States who are eligible for citizenship<sup>5</sup> – 52% of whom remain low-income.<sup>6</sup> Their naturalization would provide access to better paying jobs (up to an 11% increase to their personal earnings<sup>7</sup>), academic scholarships, and myriad other benefits.

C4C promotes the expansion of naturalization and financial empowerment programs nationwide, boosting economic opportunity for our immigrants and our communities. Our cities and counties benefit from the millions of immigrant residents who have deep roots in our communities and who contribute so much to our society.

Cities for Citizenship (C4C) City & County Member Map



To learn more or join Cities for Citizenship, visit <http://www.citiesforcitizenship.com>

<sup>5</sup> Bryan Baker, "Estimates of the Lawful Permanent Resident Population in the United States and the Subpopulation Eligible to Naturalize: 2015-2019," Office of Immigration Statistics: Office of Strategy, Policy, and Plans (Sept. 2019), available at [https://www.dhs.gov/sites/default/files/publications/lpr\\_population\\_estimates\\_january\\_2015\\_-\\_2019.pdf](https://www.dhs.gov/sites/default/files/publications/lpr_population_estimates_january_2015_-_2019.pdf).

<sup>6</sup> See Cities for Citizenship, "Citizenship: A Wise Investment for Cities" (Summer 2014), available at [https://static1.squarespace.com/static/5b3ce8865417fc2819a24bc2/t/5b43753f0e2e72bb8082226e/1531147585615/Cities\\_for\\_Citizenship.pdf](https://static1.squarespace.com/static/5b3ce8865417fc2819a24bc2/t/5b43753f0e2e72bb8082226e/1531147585615/Cities_for_Citizenship.pdf).

<sup>7</sup> *Id.*

# MUNICIPAL STRATEGIES

Cities and counties can play a key role in reducing financial barriers to citizenship. Here, we highlight municipal strategies that have already been effective in reducing financial barriers with the hope that other municipalities will use them as inspiration to develop and implement strategies tailored to their particular needs. As the long, multi-step pathway to citizenship becomes more financially burdensome, these strategies can also be implemented to address financial barriers to other immigration benefits.

## Strategy 1: Establish Partnerships with a Local Credit Union for Zero-to-Low Interest Naturalization Loans



To make citizenship more accessible, municipalities can reach out to local credit unions to create zero or low-interest loans for citizenship applicants. The loan could cover the application fee and other associated costs, such as English classes and legal representation.

### *Fayetteville, Arkansas Case Study*

The partnership was formed as a direct result of Fayetteville, AR joining Cities for Citizenship (C4C). Among the recommendations C4C makes for new members, one is to work with banks to arrange for low-interest loans to cover the cost of the citizenship application. The city of Fayetteville was put in touch with the University of Arkansas Federal Credit Union (UArk) and made the partnership pitch to offer unsecured loans for immigrants. UArk took the extra step of offering a low interest rate for unsecured loans of up to \$1,500 for naturalization.

To learn more, visit <https://www.fayetteville-ar.gov/3495/Immigrant-Welcoming-Hub>

## Strategy 2: Extend an Existing Partnership with a Local Credit Union



It is possible that your municipality already has an established relationship with a local credit union that offers zero or low-interest loans. If so, try to extend the partnership to include loans to cover costs for citizenship applicants.

### *Aurora, Colorado Case Study*

Many immigrants choose Aurora as their home, and the city is a community that celebrates its diversity. An Aurora-based credit union, Fitzsimons Credit Union made the decision in 2013 to support its residents by introducing the "DREAMer loan." As a credit union that serves the underserved, including those of low to moderate income and immigrants, Fitzsimons began offering the "DREAMer loan" to cover the cost of the Deferred Action for Childhood Arrivals (DACA) application processing fees. The loan was for \$465 (the cost of the application at the time) and was interest free. There was a \$30 application fee to process the loan. After offering the loan successfully for several years, many community members wanted to use the loan for other immigration applications, including citizenship. This seemed like a natural extension of the original purpose, and so the maximum loan amount was raised to \$700 while still keeping the interest rate and processing fee the same. Since 2015, Fitzsimons has originated 116 "DREAMer loans" totaling over \$70,000. In 2016, Fitzsimons was named a "Juntos Avanzamos" credit union. This designation is given to credit unions that demonstrate a commitment to serving and empowering Hispanic consumers.

To learn more, visit <https://www.fitzsimonscu.com/> or contact: [Info@FitzsimonsCU.com](mailto:Info@FitzsimonsCU.com)

## Strategy 3: Supplemental Existing Loan Programs with Grants



Once zero or low-interest loans are established, consider making grants available such that citizenship applicants only have to repay a portion of their loan.

### *San Francisco, California Case Study*

The Immigration Fee Assistance Program is available in San Francisco through its partnership with the Mission Asset Fund (MAF). The MAF can provide their zero-interest loans with partner sites across the country. The San Francisco-specific innovation is the 50% matching grant available to San Francisco residents. Because the grant funds come from the San Francisco Office of Civic Engagement & Immigrant Affairs, participants only have to repay half of their zero-interest loans for various immigration application fees, including citizenship, while the remaining half serves as a grant.

To learn more, visit <https://missionassetfund.org/> or contact Richard Whipple, Deputy Director of Programs Office of Civic Engagement & Immigrant Affairs with the City & County of San Francisco: [richard.whipple@sfgov.org](mailto:richard.whipple@sfgov.org)

## Strategy 4: Create a Municipal Citizenship Scholarship Program



For many low-income immigrants, even a zero or low-interest loan is not financially feasible. Consider creating a citizenship scholarship program to cover as much of the application fee and related expenses as possible.

### *Denver, Colorado Case Study*

The Denver Office of Immigrant & Refugee Affairs (DOIRA) has granted Lutheran Family Services of the Rocky Mountains (LFSRM) \$15,000 to provide filing fee scholarships to Denver, CO residents applying for naturalization under the "America is Home" Naturalization Campaign. The scholarship is meant for those who do not qualify for the waiver and are still deterred from applying for naturalization due to financial limitations. Individuals awarded the scholarship receive a check for \$371 payable to the Department of Homeland Security (DHS), to include in their application package. Qualifications for the Denver "America is Home Filing Fee Scholarship" include:

- Recipients of the scholarship must live within the City & County of Denver;
- Apply for citizenship with the Colorado Immigrant Rights Coalition (CIRC), LFSRM or at any public event organized by the America is Home Campaign; and
- Meet the financial qualifications (income must fall between 200-300% of the Federal Poverty Income Guidelines).

To learn more, please contact María Corral, Community Integration Coordinator Denver Office of Immigrant & Refugee Affairs, at [María.Corral@denvergov.org](mailto:María.Corral@denvergov.org).

## Strategy 5: Partner with a Community-Based Organization



A community-based organization can help distribute grants to cover application costs *and* remove other barriers to citizenship by providing eligibility screening, legal advice, assistance completing the application, citizenship classes, and mock interviews.

### *Montgomery County, Maryland Case Study*

Montgomery County, MD and community-based organization CASA are partnering to offer a scholarship to lawful permanent residents (LPRs) applying for citizenship who cannot afford the USCIS application fee. The County awarded a \$50,000 grant to CASA to create a “scholarship fund,” as well as to cover some costs related to program management. LPRs who are below the 300% Federal Poverty guidelines are eligible to receive this scholarship.

CASA staff screens the LPR for naturalization eligibility, provides a legal consultation, and completes the application. When eligible, the applicant receives a scholarship from CASA in the amount of \$300 to help cover the application fee. Once the application is filed, CASA continues supporting the LPRs by providing citizenship classes, one-on-one mentoring, mock interviews, and when possible, interpretation at USCIS interviews. The program is in its second year, having helped over 120 LPRs to achieve the dream of applying for the American citizenship.

To learn more, please contact: Pablo Blank, Sr. Manager, Immigrant Integration Programs at [pblank@wearecasa.org](mailto:pblank@wearecasa.org), or visit: <https://wearecasa.org/programs/citizenship/>

### *New York City, New York Case Study*

The NYC Mayor's Office of Immigrant Affairs and the NYC Mayor's Office for Economic Opportunity partnered with the New York Immigration Coalition (NYIC) to administer an immigration application fee fund which provided more than \$200,000 in direct assistance to immigrant New Yorkers eligible for relief for which they could not afford the USCIS filing fee, including for naturalization. As a non-profit umbrella advocacy organization which coordinates across many immigrant rights groups in New York, NYIC was uniquely situated to ensure that the funds would be accessible to a diverse community base. The fund served hundreds of low-income New Yorkers represented by over 50 different legal service providers for a range of application types, including naturalization applications, who were ineligible or unlikely to receive a fee waiver on their application and unable to access other funds to cover the application cost.

To learn more, please contact: Denia Perez, Policy Advisor, NYC Mayor's Office of Immigrant Affairs at [Dperez1@moconsultant.nyc.gov](mailto:Dperez1@moconsultant.nyc.gov) or visit <https://www1.nyc.gov>.

*Cities for Citizenship (C4C) Executive Committee Members*

