

August 24, 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

Subject: 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 274a (June 23, 2026)

Chief Andrew Good,

Cities & Counties for Citizenship (CC4C) and Cities for Action (C4A) respectfully submits the following 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, 2026.¹ We write to express our opposition to the proposed rule that would place United States citizenship further out of reach for many low-income lawful permanent residents who are otherwise eligible to naturalize and strongly urge that it be withdrawn.

Through this proposed rule, DHS plans to dramatically increase naturalization fees and simultaneously eliminate the reduced-fee option and fee waivers currently available for low-income applicants seeking citizenship. The NPRM proposes to adjust the naturalization fees for the Form N-400, Application for Naturalization, and the Form N-336, Request for a Hearing on a Decision in Naturalization Proceedings, which allows applicants to seek review of a denied naturalization application. The proposed rule further eliminates the availability of fee waivers for both forms and ends the reduced fee option for Form N-400. We are deeply concerned that the proposed rule threatens to exclude thousands of aspiring citizens, particularly low-income applicants, from access to citizenship.

Cities & Counties for Citizenship (CC4C) is a national, bipartisan network of over 120 local governments convened by the National Partnership for New Americans (NPNA). CC4C works to expand access to citizenship, strengthen civic participation, and advance immigrant inclusion by supporting local governments in developing and implementing effective naturalization and

¹ Naturalization Application Fee Adjustments, 91 Fed. Reg. 37,500 (June 23, 2026) (to be codified at 8 C.F.R. pt. 106).
<https://www.federalregister.gov/documents/2026/06/23/2026-12542/naturalization-application-fee-adjustments#footnote-1-p37501>.

integration initiatives. Through peer learning, technical assistance, policy development, public engagements, and partnerships with community-based organizations, the network helps cities and counties reduce barriers to citizenship and ensure eligible lawful permanent residents have access to trusted information and legal services.

Cities for Action (C4A) is a coalition of nearly 200 U.S. mayors and county executives across America advocating for pro-immigrant public policies and launching innovative, inclusive programs and policies at the local level.

CC4C and C4A's partners—including mayors and county executives—serve communities with thousands of lawful permanent residents who are eligible to naturalize or are in the process of becoming U.S. citizens. Across the network, local governments regularly host citizenship workshops, naturalization clinics, application assistance events, outreach campaigns, and naturalization oath ceremonies in partnership with legal service providers and community based organizations. These efforts strengthen local economies, increase civic participation, and promote community stability.

Because our networks work directly with local governments and community partners supporting naturalization, CC4C and C4A have a significant interest in the Department of Homeland Security's proposed rule. The proposed increases to naturalization application and appeal fees, coupled with the elimination of fee waivers and reduced-fee options, would create substantial financial barriers for eligible lawful permanent residents seeking to become U.S. citizens. These changes would undermine years of investment by local governments to increase naturalization rates, reduce participation in citizenship programs, and make it more difficult for trusted local partners to connect residents to the benefits of citizenship.

At a time when many communities are working to expand access to naturalization and encourage eligible residents to apply for citizenship, the proposed rule moves in the opposite direction. Rather than removing barriers to naturalization, it would make citizenship less accessible for working families and undermine our values as Americans by excluding millions of eligible immigrants and refugees who call our cities and counties home, based solely on their inability to afford application fees. For these reasons, we, the undersigned mayors and county executives, urge you to withdraw this Notice of Proposed Rulemaking and preserve affordable pathways to U.S. citizenship.

Under the proposed rule, USCIS would increase the filing fee for the Form N-400 to \$1,330 for paper filings, up from \$760, a 75 percent increase, and to \$1,280 for online filings, up from \$710, an 80 percent increase. The agency would also increase the filing fee for Form N-336 to \$1,475 for paper filings, up from \$830, a 78 percent increase, and to \$1,425 for online filings, up from \$780, an 83 percent increase. USCIS states that because it is primarily funded through

immigration and naturalization benefit request fees, the proposed fee increases for Forms N-400 and N-336, including the proposed changes eliminating fee waivers and reduced fees for these forms, are intended to recover the full costs of adjudicating these applications in accordance with the beneficiary-pays principle. The agency states that current fees do not recover the full cost of thoroughly adjudicating applications for naturalization, including screening and vetting checks, which USCIS has enhanced under President Trump's several Executive Orders signed since his return to office.

The proposed rule would eliminate both the reduced-fee and fee-waiver provisions that have historically made naturalization accessible to lower-income applicants. Under the fee rule that took effect in 2024, applicants for naturalization with household incomes between 150 and 400 percent of the Federal Poverty Guidelines became eligible for a reduced filing fee of \$380 for Form N-400.² The proposed rule would eliminate that reduced-fee option entirely. It would also eliminate the existing fee-waiver provisions for Forms N-400 and N-336 that were first introduced through a USCIS Fee Schedule Final Rule in 2010, which introduced a standardized Form I-912 for requesting fee waivers for various immigration forms and petitions, including naturalization.³ Currently, applicants may obtain a full fee waiver if they receive certain means-tested public benefits, have a household income at or below 150 percent of the Federal Poverty Guidelines, or demonstrate financial hardship.⁴ The proposed rule would require all applicants, including those who currently qualify for a reduced fee or who have qualified for a full fee waiver for over a decade, to pay the new substantially increased proposed filing fees. 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. The proposed rule maintains the fee exemptions for military service members.⁵

CC4C and C4A have a strong interest in preserving fee waivers and reduced-fee options because affordable access to naturalization is essential to the success of local citizenship initiatives. Across the country, local government partners invest significant resources in helping eligible lawful permanent residents navigate the naturalization process through outreach, education, legal services partnerships, citizenship clinics, and application assistance. These efforts are built on the

² U.S. Citizenship and Immigration Services (USCIS), *Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements*, 89 Fed. Reg. 6194 (final rule Jan. 31, 2024). <https://www.federalregister.gov/documents/2024/01/31/2024-01427/us-citizenship-and-immigration-services-fee-schedule-and-changes-to-certain-other-immigration-s>

³ *U.S. Citizenship and Immigration Services Fee Schedule*, 75 Fed. Reg. 58,962 (Sept. 24, 2010) (codified at 8 C.F.R. § 103.7(c)) (listing Forms N-336 and N-400 as eligible for fee waivers). <https://www.federalregister.gov/documents/2010/09/24/2010-23725/us-citizenship-and-immigration-services-fee-schedule>.

⁴ USCIS, *Policy Manual*, Vol. 1, Part B, Ch. 4, Fee Waivers and Fee Exemptions. <https://www.uscis.gov/policy-manual/volume-1-part-b-chapter-4>.

⁵ INA Section 328 (8 U.S.C. 1439); INA Section 329 (8 U.S.C. 1440).

understanding that financial barriers should not prevent otherwise eligible individuals from becoming U.S. citizens.

For cities and counties, the proposed rule also threatens the long-term sustainability of local citizenship and immigrant inclusion programs. Many local governments evaluate the success of these initiatives by measuring increases in naturalization applications, approvals, and civic engagement. If eligible residents are priced out of the naturalization process, cities and counties may experience declining participation and outcomes despite maintaining or increasing investments in outreach and services. This could make it more difficult to sustain local funding, justify continued public investment, attract philanthropic support, and expand successful integration initiatives.

Naturalization produces well-documented benefits for individuals, local economies, and communities, including increased earnings, higher rates of civic participation, and stronger economic resilience. A 2015 study by the Urban Institute, for example, focused on 21 major cities, found that naturalization increased the earnings of eligible immigrants by 8.9%, or \$3,200 per year and boosted their overall employment rate by 2.2 percentage points and their homeownership rate by 6.3 percentage points. If all who are eligible became U.S. citizens, the study found, their combined earnings in the 21 cities would increase by \$5.7 billion, boosting tax revenues by \$2.03 billion and adding 45,000 new homeowners⁶. Local governments invest in citizenship because these benefits strengthen communities and contribute to local economic growth. By eliminating fee waivers and reduced-fee options and substantially increasing application costs, the proposed rule would undermine the ability of cities and counties to achieve these public policy objectives and would impede the missions of CC4C, C4A, and the local governments they represent.

For many lawful permanent residents, the cost of applying for naturalization is already one of the greatest obstacles to citizenship. Local governments and their community partners consistently identify application fees as a primary reason eligible residents delay or forgo applying, even after receiving legal assistance and completing the citizenship process. Fee waivers and reduced-fee options have long served as critical tools that make citizenship attainable and eliminating these affordability measures while significantly increasing naturalization fees would place citizenship further out of reach for thousands of eligible residents, delaying or preventing them from accessing the economic, civic, and social benefits that come with becoming U.S. citizens. These barriers would have far-reaching consequences for local communities. Fewer naturalized citizens means lower rates of civic participation, including voter registration and engagement, reduced economic mobility and workforce advancement, and slower integration into community life.

⁶ Citizenship for a Stronger Economy

<https://cc4citizenship.org/wp-content/uploads/2024/12/Citizenship-for-a-Stronger-Economy-FINAL.pdf>

Maintaining fee waivers and reduced-fee options directly advances CC4C's mission of expanding access to citizenship and supporting local governments in creating welcoming, inclusive communities. When eligible residents are able to naturalize, communities benefit through increased civic participation, stronger local economies, greater family stability, and more resilient neighborhoods. Preserving affordable pathways to citizenship ensures the ability to obtain the immigration status for which lawful permanent residents are eligible for and should not depend on the size of your bank account.

The proposal departs from the agency's longstanding policy of promoting access to naturalization through affordable filing fees and fee relief and is not supported by the facts in the administrative record, a reasoned policy justification, or a sufficient legal basis.⁷ USCIS also fails to meaningfully consider the disproportionate impact on financially vulnerable applicants, evaluate reasonable alternatives that would preserve access to naturalization while meeting the agency's fiscal objectives, or demonstrate a rational connection between the proposed changes and its stated goals.

The proposed rule would create significant financial barriers to naturalization for otherwise eligible applicants and would disproportionately burden low-income individuals and families. The proposed changes also fail to account for the broader public benefits of naturalization. Which include, increased civic participation, stronger workforce outcomes, higher earnings, and greater economic contributions to local communities—or to consider less harmful alternatives that would allow the agency to meet its fiscal objectives without undermining access to citizenship.

For these reasons, the undersigned mayors and county executives, urge you to withdraw the proposed rule and instead prioritize ensuring that the cost of applying for citizenship does not become an obstacle for those who are otherwise qualified under the law by maintaining affordable naturalization filing fees and preserving reduced-fee and fee-waiver options for eligible applicants.

Sincerely,

Cities & Counties for Citizenship Executive Committee AND Cities for Action Steering Committee members:

Mayor Karen Bass, Los Angeles, California

Mayor Brandon Johnson, Chicago, Illinois

Mayor Michelle Wu, Boston, Massachusetts

⁷ 89 Fed. Reg. 6194, 6196–97 (Jan. 31, 2024) (recognizing the importance of fee waivers and reduced fees to improve access to immigration benefits); 8 C.F.R. § 106.3 (2024) (codifying eligibility criteria for fee waivers and reduced fees).

Mayor Zohran K. Mamdani, New York, New York
Mayor Katie B. Wilson, Seattle, Washington

Local Government Partners:

Deputy County Executive David Campos, County of Santa Clara, California
Mayor Todd Gloria, San Diego, California
At Large City Council Alli Jackson, Aurora, Colorado
City Council Gianina Horton, Aurora, Colorado
Mayor Justin Elicker, New Haven, Connecticut
Mayor Muriel Bowser, Washington, DC
Mayor Sue Muncaster, Victor, Idaho
Mayor John Laesch, Aurora, Illinois
Clerk Andrea M. Valencia, Chicago, Illinois
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Mayor Daniel Biss, Evanston, Illinois
County Executive Marc Elrich, Montgomery County, Maryland
Mayor Celina Benitez, Mount Rainier, Maryland
Mayor Jake Wilson, Somerville, Massachusetts
Mayor Jacob Frey, Minneapolis, Minnesota
Mayor Kaohly Her, Saint Paul, Minnesota
Mayor James Solomon, Jersey City, New Jersey
Supervisor William Moehle, Brighton, New York
Mayor Keith Wilson, Portland, Oregon
Commissioner David C. Stout, El Paso County, Texas
Commissioner Iliana Holguin, El Paso County, Texas
County Executive Girmay Zahilay, King County, Washington