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[www.minneapolismn.gov](http://www.minneapolismn.gov)

December 21, 2019

Samantha Deshommnes  
Chief Regulatory Coordination Division  
Office of Policy and Strategy  
US Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Ave. NW  
Mailstop 2140  
Washington, DC 20529-2140

RE: DHS Docket No: USCIS-2019-0010 "U.S. Citizenship and Immigration Services Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements"  
RIN: 1615-AC18  
*Submitted via [www.regulations.gov](http://www.regulations.gov)*

Dear Ms. Deshommnes:

As the Mayor of the City of Minneapolis, a city with a dynamic immigrant population composed of individuals eligible for various immigration benefits including asylum, Deferred Action for Childhood Arrivals (DACA), permanent residence and United States citizenship, I am writing to explain how damaging the proposed rule entitled "U.S. Citizenship and Immigration Services Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements" published in the Federal Register on November 14, 2019 (hereinafter "proposed rule") would be for our immigrant community and for our City.

For the reasons described in greater detail below and on behalf of residents of the City who would be harmed if implementation proceeds, I strongly urge withdrawal of this proposed Rule. In addition, given the complexity and length of the rule, not to mention the potentially devastating impact, I also ask that the review period for this proposed rule be extended to the standard 60-day review period.

The City of Minneapolis is committed to identifying methods to increase the immigration stability of our residents. We recognize that making the transition from temporary status to permanent status in this country, with the ultimate goal of U.S. Citizenship, creates tangible benefits for our city residents and their families, as well as for our municipality, state and country. For example, it is estimated that a person who transitions from US Permanent Residence to US citizenship enjoys an average increased earning capacity of \$2,200 annually within 1-2 years of becoming a U.S. Citizen.<sup>1</sup> There are approximately 8000 Minneapolis residents who have not yet filed for citizenship.<sup>2</sup> Estimates for cities with a similar size population of permanent residents indicate that

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<sup>1</sup> [America is Home: How Individuals, Families Cities and Counties Benefit by Investing in Citizenship](https://populardemocracy.org/sites/default/files/C4C%20CPD%20NPNA%20America%20is%20Home%20Report%209-12-18%20FINAL.pdf), 2017-2018 Impact Report, Cities for Citizenship.  
(<https://populardemocracy.org/sites/default/files/C4C%20CPD%20NPNA%20America%20is%20Home%20Report%209-12-18%20FINAL.pdf>)

<sup>2</sup> <https://dornsife.usc.edu/csii/eligible-to-naturalize-map>

if all of those eligible were to naturalize, tax revenues (payroll, federal, state and city income taxes) could increase by an estimated \$155 million.<sup>3</sup> Thus, even considering economic reasons alone, it makes sense to support measures to encourage residents to pursue citizenship.

In Minneapolis, we recognize that income-based barriers to acquisition of immigration status already exist. For this reason, the City partners with immigration legal service organizations to help ensure that people who could qualify for the right to remain in the United States are not prevented from obtaining immigration stability due to poverty.

This proposed rule, if implemented, would impose fees of such magnitude that they would effectively bar acquisition or retention of immigration status for hundreds of thousands, if not millions, of people nationwide and would have immediately felt impacts for residents of the city of Minneapolis.

The combination of a significant increase in US Citizenship and Immigration Services filing fees with severe restriction on the ability to submit a filing fee waiver would result in many fewer residents of the City being able to obtain immigration status, not because they don't qualify, but because they cannot afford to pay. While USCIS states that the fee increases proposed would make it "more equitable for all immigration benefit requests by requiring fees for the service to be paid by those who benefit." In reality, the fee increases joined with curtailment of ability to waive filing fees is patently inequitable. Furthermore, that an individual's ability to obtain immigration security would be at risk due to poverty is an unacceptable and unconscionable outcome.

The fee changes contained in the proposed rule include:

- An 83% increase in the naturalization application fee, from \$640 to \$1170, despite the documented benefits of encouraging naturalization;
- A 70% increase in the filing fee to obtain permanent resident ("green card") status, from \$1220 to \$2195, particularly egregious when considering the impact where multiple family members are applying together for US permanent residence as a family;
- DACA renewal fee increase from \$495 to \$765 (here in Minnesota we know that some DACA beneficiaries have found even the existing \$495 renewal fee unaffordable);<sup>4</sup>
- Implementation, for the first time ever, of an application fee for asylum applicants of \$50 and imposition of a filing fee for first work authorization applications for asylum applicants (whose first work card applications at present have no filing fee);
- Raising the fee for the I-192 Application for Advance Permission to Enter as a Nonimmigrant fee from \$930 to \$1415.00 (an increase of 52%), and, finally
- Raising the I-929 Applications for Qualified Family Members of U visa holders from \$230 to \$1515.00, an incredible increase of 559%.

These and other filing fee increases do not reflect our shared values and certainly do not reflect the American ideal of a country that encourages acquisition of valid immigration status.

Since the last USCIS fee schedule adjustment in December 2016, USCIS processing times have drastically increased. There is no indication that an increase in filing fees will result in an increase in quality of USCIS services. Furthermore, the proposed annual transfer from USCIS to Immigration and Customs Enforcement (ICE) of over \$100 million for enforcement purposes, including

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<sup>3</sup> [The Economic Impact of Naturalization on Immigrants and Cities](https://www.urban.org/research/publication/economic-impact-naturalization-immigrants-and-cities/view/full_report), Research Report, December 2015.  
[https://www.urban.org/research/publication/economic-impact-naturalization-immigrants-and-cities/view/full\\_report](https://www.urban.org/research/publication/economic-impact-naturalization-immigrants-and-cities/view/full_report)

<sup>4</sup> <https://minnesota.cbslocal.com/2018/01/19/daca-filing-fees-fundraising/>

denaturalization, appears improper, as USCIS is an agency that is responsible for processing immigration benefits, not dedicating a significant amount of its budget to immigration enforcement operations.

We all benefit when community members take steps to obtain more secure immigration status and authorization to work in the United States. The proposed rule, if implemented, will create an insurmountable financial hurdle for hundreds of thousands of people nationwide, and improperly reallocates significant resources from benefit processing to enforcement.

For these reasons, as Mayor of the City of Minneapolis, I urge you to withdraw the proposed rule, and work to identify alternative solutions to address budgetary shortfalls in a way that does not inequitably prevent individuals from obtaining immigration status solely on the basis of income deficiency.

I appreciate the opportunity to submit comments on the proposed rule. Please do not hesitate to contact me to provide further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Frey', with a long horizontal stroke extending to the right.

Jacob Frey  
Mayor of Minneapolis

Cc: Minnesota Congressional Delegation