August 21, 2026

Samantha Deshommes
Acting 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: Proposed Adjustment of Fees for Form N-400, and Form N-336, to Terminate the Reduced Fee Option for Form N-400, and the Fee Waivers for Both Forms, Document No. USCIS-2026-0265-0001

Dear Ms. Deshommes,

Project Citizenship appreciates the opportunity to submit these comments regarding the Department of Homeland Security's ("DHS") proposed rule, *Naturalization Application Fee Adjustments*, published at 91 Fed. Reg. 37500 (June 23, 2026). Project Citizenship strongly urges U.S. Citizenship and Immigration Services ("USCIS") to withdraw the proposed fee increases and, at a minimum, retain the existing fee-waiver and reduced-fee mechanisms for eligible naturalization applicants.

Project Citizenship is a nonprofit organization based in Boston, Massachusetts. Since 2014, we have helped thousands of lawful permanent residents throughout New England overcome barriers to U.S. citizenship through direct legal services, pro bono partnerships, and volunteer support. Our services are provided free of charge. As an organization focused on increasing access to naturalization and civic participation, we regularly work with applicants who cannot afford the current naturalization filing fee and therefore rely on the existing fee-waiver and reduced-fee mechanisms. We also serve a significant number of applicants seeking an exemption from the English and civics requirements based on a disability or medical impairment through Form N-648.

USCIS proposes three principal changes relevant to this comment. First, USCIS would increase the Form N-400 filing fee from $760 to $1,330 for paper filings and from $710 to $1,280 for online filings—an increase of 75 percent and 80 percent, respectively. Second, USCIS would eliminate the reduced-fee option currently available to applicants whose household income is at or below 400 percent of the Federal Poverty Guidelines. Third, USCIS would eliminate eligibility for fee waivers for both Form N-400 and Form N-336.

USCIS is already experiencing lengthy processing times, and these proposed changes risk creating additional unnecessary barriers to naturalization and civic inclusion. Increasing the N-400 fee by up to 80 percent while eliminating fee waivers and reduced fees would severely limit a pathway to citizenship that lawful permanent residents have earned, particularly low-income lawful permanent residents, applicants with disabilities, and families facing significant medical expenses or reduced earning capacity. USCIS should therefore reconsider the proposed changes in light of the broader public-interest considerations relevant to naturalization policy.

I. The Proposed Fee Increase Will Disproportionately Impact the Most Vulnerable Lawful Permanent Residents

Increasing the N-400 filing fee by 75 to 80 percent, while simultaneously eliminating both the fee waiver and reduced-fee options, would create an exceptionally significant financial barrier to naturalization for the most vulnerable permanent residents. The proposed rule would place an important form of civic inclusion increasingly out of reach for individuals based solely on their ability to pay. A lawful permanent resident may satisfy all statutory requirements for naturalization and yet be unable to file an N-400 simply because they cannot afford a $1,280 or $1,330 filing fee.

The elimination of fee waivers is especially concerning for applicants whose disabilities or medical conditions prevent them from working or substantially limit their household's earning capacity. A significant portion of the applicants served by Project Citizenship are seeking a disability exception from the English and/or civics requirements through Form N-648. These applicants frequently live with significant medical impairments that affect their ability to work and earn income. Many also live in households that face significant medical expenses, including costs associated with medications, treatment, transportation to appointments, caregiving and other disability-related needs.

For these applicants, the proposed naturalization fee would not merely represent an increase to an ordinary household expense. It would be imposed on families whose financial resources may already be substantially constrained by disability and medical costs. Requiring such applicants to pay $1,280 or $1,330, with no possibility of requesting a fee waiver or reduced fee, could effectively prohibit otherwise eligible individuals from pursuing citizenship.

USCIS should not adopt a fee policy that, in practice, creates an insurmountable financial barrier for precisely the population that Congress has already recognized face barriers to completing the ordinary naturalization requirements.

II. The Proposed Fee Increase Would Also Burden Working Families

The impact would not be limited to households living below the Federal Poverty Guidelines or those with disabilities. Even working families may have substantial difficulty paying a fee of $1,280 or $1,330, particularly when multiple members of the same household are eligible for naturalization.

For example, when several members of a family become eligible for citizenship around the same time, the filing fees can multiply quickly. A family of four filing online would face approximately $5,120 in N-400 filing fees under the proposed schedule, compared with $2,840 under the current fee schedule. That represents an additional $2,280 in government filing fees for a single family seeking to complete the naturalization process. Families should not have to choose between pursuing citizenship and paying for rent, food, medical care, transportation, education, or other essential household expenses.

Additionally, some applicants have more complicated legal backgrounds and require more intensive and specialized legal representation during the naturalization process. Although Project Citizenship's services are provided free of charge, these applicants may ultimately need to hire private attorneys and pay significant legal fees to obtain adequate representation. As USCIS increases its vetting and scrutiny of naturalization applications, applicants with complicated legal histories may also face increasingly complex legal issues requiring careful review and preparation by attorneys. Requiring these applicants to pay substantially higher government filing fees, while eliminating any opportunity to request a fee waiver or reduced fee, would impose an additional and unnecessary financial burden.

The proposed fee is therefore unreasonable and risks making naturalization inaccessible even to working families with limited disposable income.

III. The Proposed Changes Will Shift, Not Eliminate, Administrative Burdens for USCIS

The combined effect of increased government filing fees and potentially significant private legal fees could discourage eligible lawful permanent residents from applying for citizenship. Applicants who are unable to afford the increased cost may instead postpone naturalization and continue renewing their lawful permanent resident status. This would undermine the broader goal of encouraging eligible lawful permanent residents to become U.S. citizens while potentially shifting, rather than eliminating, administrative burdens for USCIS.

For the reasons discussed above, Project Citizenship strongly urges USCIS to withdraw the proposed fee increases and to maintain the existing fee waiver and reduced-fee options for Form N-400. A fee increase of up to 80 percent, combined with the elimination of fee waivers and reduced fees, places a disproportionate burden on applicants who are least able to afford it. We therefore respectfully request that USCIS reconsider the proposed fee schedule, preserve meaningful affordability mechanisms for naturalization applicants, and ensure that financial hardship does not become an insurmountable barrier to citizenship for otherwise eligible lawful permanent residents.

Thank you for your consideration of our comments.

Project Citizenship