

December 19, 2019

Ms. Samantha Deshombres, Chief
Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Ave. NW
Washington, DC 20529

Re: U.S. Citizenship and Immigration Services Fee Schedule, DHS Docket No. USCIS-2019-0010; RIN 1615-AC18

Dear Chief Deshombres,

On behalf of PUMP, a 501(c)3 nonprofit in Pittsburgh, Pennsylvania, we appreciate the opportunity to comment on the proposed U.S. Citizenship and Immigration Services (USCIS) Fee Schedule, published on November 14, 2019. We submit this letter in opposition to the fee and policy proposals. We request that USCIS withdraw all provisions that make USCIS services less accessible to low-income and vulnerable immigrants.

Founded in 1996, PUMP's mission is to make the Pittsburgh region the most dynamic and diverse place by engaging, educating, and mobilizing all young people to create change in our community. Each year, we serve nearly 30,000 people, primarily under the age of 40, through our advocacy, civic, and social programming.

In 2017, our constituents helped design our advocacy and public policy agenda, which reflects our vision for regional equity and includes a focus on protection and support for immigrants and refugees. We are grateful for the thriving immigrant communities who bring diverse cultures and ideas, contribute to our economy, and are integral to the continued growth of the Pittsburgh region. USCIS's proposed fee schedule threatens the welcoming, inclusive region we are working to build, by creating new and excessive barriers, especially for low-income and other vulnerable immigrants.

For example, increasing naturalization fees and eliminating fee waivers would create unnecessary financial burdens for long-term residents seeking to become full citizens. It would prevent many low-income immigrants from applying for naturalization. Others would suffer unnecessary financial harm if forced to pay the proposed fee. Naturalization helps individuals, families, communities, and the economy – we should be reducing barriers to apply, not increasing them.

In addition, the proposal to impose a new \$50 fee for those filing for affirmative asylum targets the world's most vulnerable people – those who have been forced to flee their homes and seek refuge. Demanding payment from asylum seekers flies in the face of our obligation to accept asylum seekers under domestic and international law. Currently, only three countries – Iran, Fiji, and Australia – impose a fee for asylum seekers. As a world leader, we have a moral imperative to demonstrate a humane immigration system to the countries who look to us.

Furthermore, the move to transfer over millions of dollars in fees from USCIS to Immigration and Customs Enforcement (ICE), despite a significant waitlist for USCIS services, shows a blatant neglect of USCIS' own mission to efficiently and fairly adjudicate requests for immigration benefits.

The changes USCIS has proposed do not just create tangible financial barriers for low-income immigrants, but they also send a clear, anti-immigrant message that threatens the inclusive, welcoming communities we strive to create here in the Pittsburgh region. PUMP believes that our region and our country is stronger when immigrants and refugees are supported and protected. We believe in everyone having the opportunity to thrive – not in pricing people out of opportunity. Ultimately, these fee changes threaten to keep the American dream out of reach for low-income immigrants. PUMP strongly opposes these proposed fee changes and we urge you to withdraw them.

Thank you for the opportunity to submit comments on the proposed fee schedule.

Sincerely,

Brian Magee
CEO
PUMP