



**ADVISORY BOARD**

Hon. John Burton  
Hon. Nancy Pelosi

**BOARD OF DIRECTORS**

Cynthia Alvarez  
Richard Boswell  
W. Hardy Callcott  
Aidin Castillo  
Eva Grove  
Tzion Gurmu  
Bill Ong Hing  
Luca D. Mangini  
Anita Martinez  
Michelle Mercer  
Toni Rembe  
Rudy Ruano  
Guadalupe Siordia-Ortiz  
Lisa Spiegel  
Alan Tafapolsky  
Mawuena Tendar  
Hon. James L. Warren (Ret.)  
Allen S. Weiner  
Roger Wu

**GENERAL COUNSEL**

Bill Ong Hing

**OF COUNSEL**

Don Ungar

**EXECUTIVE DIRECTOR**

Eric Cohen

**San Francisco**

1458 Howard Street  
San Francisco, CA 94103

**Washington, D.C.**

600 14th Street, NW  
Suite 502  
Washington, D.C. 20005

**San Antonio**

10127 Morocco Street  
Suite 149  
San Antonio, TX 78216

**Austin**

6633 East Hwy 290  
Suite 102  
Austin, TX 78723

ilrc@ilrc.org  
www.ilrc.org



May 8, 2023

Jerry Rigdon  
Acting Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security

Re: Comment in Response to the DHS/USCIS Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Reduced Fee; Docket No. USCIS-2018-0002; OMB Control Number 1615-0133

Dear Acting Chief Rigdon,

The Immigrant Legal Resource Center (ILRC) submits the following comment in response to the Department of Homeland Security's (DHS) Agency Information Collection Activities; Revision of a Currently Approved Collection: Request for Reduced Fee, published on March 9, 2023.

The ILRC is a national non-profit organization that provides legal trainings, educational materials, and advocacy to advance immigrant rights. The ILRC's mission is to work with and educate immigrants, community organizations, and the legal sector to continue to build a democratic society that values diversity and the rights of all people. Since its inception in 1979, the ILRC has provided technical assistance on hundreds of thousands of immigration law issues, trained thousands of advocates, and pro bono attorneys annually on immigration law, distributed thousands of practitioner guides, provided expertise to immigrant-led advocacy efforts across the country, and supported hundreds of immigration legal non-profit organizations in building their capacity.

The ILRC also leads the New Americans Campaign, a national non-partisan effort that brings together private philanthropic funders, leading national immigration and service organizations, and over two hundred local services providers across more than 20 different regions to help prospective Americans apply for U.S. citizenship.

Through our extensive naturalization network with service providers, immigration practitioners and immigration benefits applicants, we have developed a profound understanding of the barriers faced by low-income immigrants of color seeking to naturalize. As such, we welcome the opportunity to provide comments on Form I-942, Request for Reduced Fee.

We wish to commend the agency on its efforts to streamline the form and to eliminate the collection of unnecessary contact information for applicants, preparers and interpreters. In previous comments to USCIS, we have advocated for the shortening and streamlining of forms as a measure to make the forms more user-friendly for pro se applicants. Naturalization

applicants identify cost barriers as the main reason they do not apply to naturalize.<sup>1</sup> Shortening this particular form from nine pages to six and eliminating the collection of unnecessary contact information will go a long way to ensuring that eligible applicants – particularly pro se applicants – are more willing to complete the reduced fee request and complete the naturalization process. The streamlining of the certification sections for applicants, interpreters, and preparers similarly makes the form less intimidating for pro se applicants. We encourage USCIS to take similar steps for all other benefit application forms in the hope that the burden on applicants and adjudicators alike will be lessened.

We note that for the family member certification, there is only space for one family member's signature where Part 2 allows for the inclusion of more family members as part of the request. While we are not opposed to the elimination of the requirement for multiple family signatures, USCIS should provide clarification on both the form and in the instructions of who should sign the family certification and provide the required contact information. Without this clarification, it is likely that applicants with larger families may fill this section out incorrectly, potentially resulting in a rejection of the fee reduction application and the underlying naturalization application. Better clarification from USCIS will avoid unnecessary denials and requests for evidence and allow for more expeditious processing of the fee reduction request and underlying naturalization application.

Finally, we renew our request to make both this form and Form I-912, Request for Fee Waiver, available for online filing. Currently, low-income naturalization applicants who require a fee waiver or a reduced fee are barred from applying for naturalization online as associated applications must be filed in the same manner. It is our understanding that USCIS seeks to encourage the online filing of naturalization applications as a matter of efficiency and to reduce processing times and administrative burdens associated with paper applications. While the ability to file paper applications must be maintained, insofar as an online filing is available as an efficiency measure, low-income applicants should not be shut out of this measure based on their need for a fee waiver or fee reduction.

In short, we commend the agency for its efforts to streamline Form I-942, Request for Reduced Fee, and encourage the agency to provide more clarification on the requirements for family member signatures on the form.

Best Regards,

/s/Elizabeth Taufa

Elizabeth Taufa, Policy Attorney and Strategist  
Immigrant Legal Resource Center

---

<sup>1</sup> USC Dornsife Equity Research Institute, *Interactive Map: Eligible to Naturalize Adults by Probability of Naturalization - by PUMA (2018)*, 2018, <https://dornsife.usc.edu/csii/map-eligible-to-naturalize-puma/>.