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New York City Comptroller
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OPENING THE GOLDEN DOOR:

Lowering the Cost of Citizenship in
the Immigrant Capital of the World





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I. EXECUTIVE SUMMARY

For many immigrants, becoming a United States citizen is one of the most important and emotional milestones in their lives, representing the end of a long and arduous journey and the beginning of a new chapter filled with hope and opportunity. As former Secretary of State Madeline Albright has stated, citizenship represents, “not just a change in legal status, but a license to a dream.”¹

However, in recent years, the soaring cost of the citizenship application process has erected a barrier to the realization of that dream, hurting immigrant families and serving as a drag on our City’s economy.

This report, by Comptroller Scott M. Stringer, highlights how this high cost represents a significant obstacle for the nearly 670,000 Legal Permanent Residents (LPRs) who reside in the City and are eligible for naturalization. This hurdle not only affects the lives of these individuals and their families, but also has profound consequences for the City’s economy. As the report shows:

- The cost of a naturalization application—including the mandatory “biometric fee”—has soared from \$60 in 1989 to \$680 today, a sum well beyond the reach of many working families. This represents an almost 500 percent increase even after accounting for inflation.²
- These fees are amplified by additional costs that can run into the thousands of dollars, including the cost of English classes (typically around \$400 per week for group lessons) and consultations with immigration lawyers (fees can run as high as \$1,500).³
- Immigrants who naturalize in New York City experience increases in annual incomes of approximately \$1,975 to \$3,265,⁴ boosting wages for individuals and bolstering tax receipts for the City.

New York City has long depended on the strength of immigrant communities to power our economy and strengthen our neighborhoods. For generations, part of the immigrant experience has been securing citizenship and the benefits—economic, political, and social—that come with it.

To that end, this report makes a series of recommendations for action at the federal and local level that can once again bring citizenship within reach for thousands of LPRs:

Federal

1. Congress should direct additional resources to the U.S. Citizenship and Immigration Services (USCIS) in order to reduce, or even eliminate, application fees for becoming a citizen. Currently, fees alone are responsible for funding 95 percent of USCIS’s operations.
2. USCIS should conduct more comprehensive fee studies and improve the waiver process. Currently, the USCIS conducts a fee study every two years to assess whether its fees are aligned with the costs of providing its various services. Although the agency offers full fee

waivers to households below 150 percent of the poverty line, the waiver process is confusing and inconsistently applied.⁵ By examining its fee structure more frequently, USCIS will be able to determine if it can lower any fees or offer partial waivers.

3. USCIS should research alternative payment options, including a staggered payment system that enables eligible immigrants to pay fees on an installment plan.

Local

New York City should not wait for Washington to act. Rather, we can take a series of steps right here in the five boroughs:

1. Engage community-based organizations (CBOs) and businesses on a public-private partnership to offer more “on-site” citizenship assistance programs in industries with large immigrant populations.
2. Increase funding for English as a Second Language (ESL) and civics classes to help reduce the hidden costs associated with the citizenship application process, including restoration of the 6,000 adult literacy seats cut from last year’s budget.⁶
3. Expand free legal services for immigrants by partnering with local law schools and offering public interest fellowships. New York City should increase funding for the various organizations that already provide free, high-quality legal services, and also leverage the power of local law school clinics to provide additional legal representation for immigrants interested in naturalization.
4. Explore innovative microloan financing programs to steer immigrants away from costly predatory lenders and down a path to citizenship.
5. Create a NYC tax credit to encourage employers to subsidize citizenship applications. Businesses that employ immigrant workers should be given the opportunity to participate in a citywide program through which they subsidize a portion of their employees’ application costs in order to qualify for a tax credit. By joining their employees on their journeys to citizenship, employers will be able to establish deeper bonds with their workers and improve retention, productivity, and profitability.

New York City has long benefitted from its reputation as the immigrant capital of the world by drawing people from every corner of the globe to put down roots, build businesses, and raise families. As a result, we have a unique responsibility—and economic interest—in ensuring that the golden door of opportunity remains open to everyone seeking to achieve the American Dream.

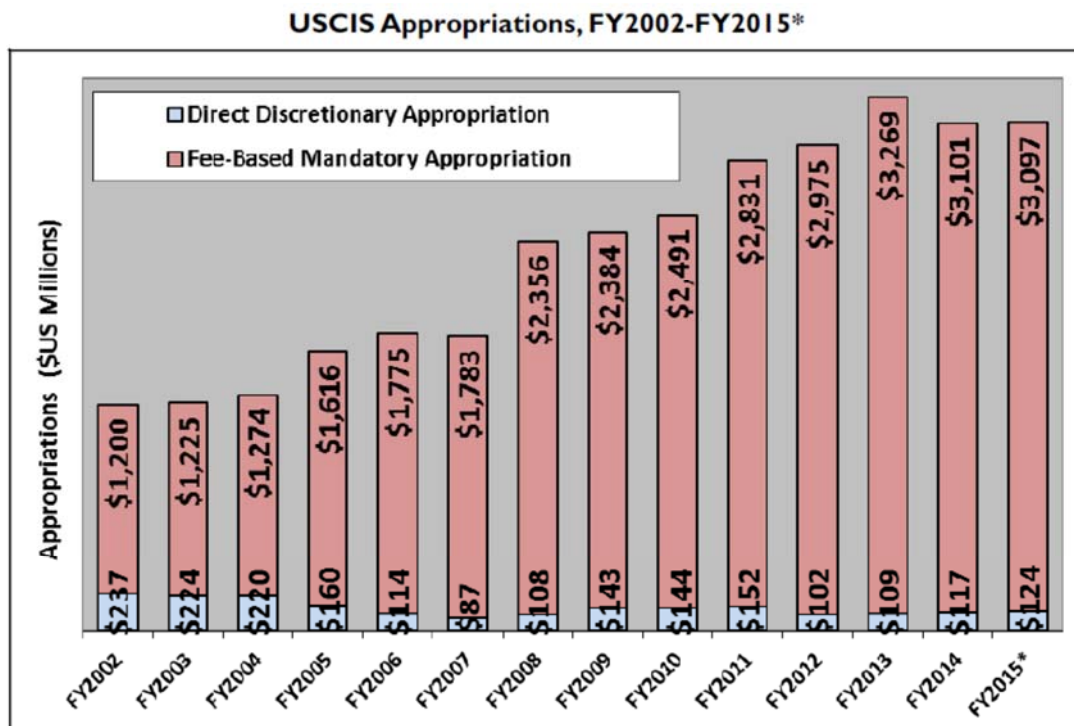
II. HISTORY OF CITIZENSHIP APPLICATION FEES

From 1933 to 2003, the Immigration and Naturalization Service (INS) was an agency under the Department of Justice responsible for immigration and naturalization matters. In 2003, INS was broken up into three separate agencies, all under the newly formed Department of Homeland Security (DHS): U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), and the U.S. Citizenship and Immigration Services (USCIS).

USCIS is responsible for processing immigration and naturalization petitions. Since at least 1952, fees have been charged for certain immigration services under the Immigration and Nationality Act.⁷ In 1988, Congress authorized immigration services (then INS, now USCIS) to retain user fees and use those fees to provide services, rather than to remit the fees to the Treasury like most other federal user fees.⁸

The law states that the fees be set at a level that will, “ensure recovery of the full costs of providing all such services, including the costs of similar services provided without charge to asylum applicants or other immigrants...[and] that will recover any additional costs associated with the administration of the fees collected.”⁹

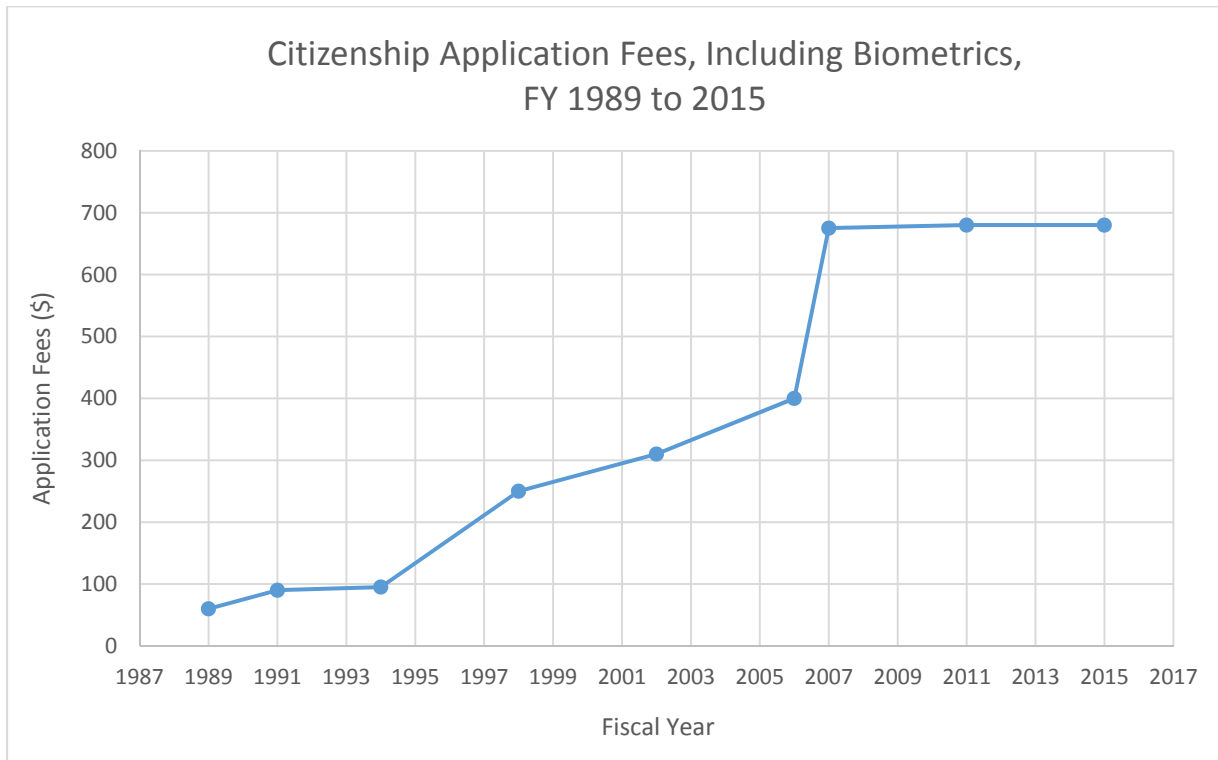
As a result, with a few notable exceptions,¹⁰ the agency has been largely dependent upon fees to fund its operations. In fact, today, more than 95 percent of USCIS’s budget is funded by user-generated application fees, as shown in the chart below.¹¹



Source: FY2002-FY2014: CRS presentation of actual figures from DHS Budget in Brief and Budget Justifications, FY2003 through FY2015; FY2015*: enacted figures from P.L. 114-4 (The Department of Homeland Security Appropriations Act, 2015).

In recent decades, the costs of applying for U.S. citizenship have soared. In 1989, it cost \$60 to file an application, but today, the application fee is \$595, plus an additional \$85 “biometric fee.” Even after accounting for inflation,¹² this \$680 price tag represents a 491 percent increase from 1989.

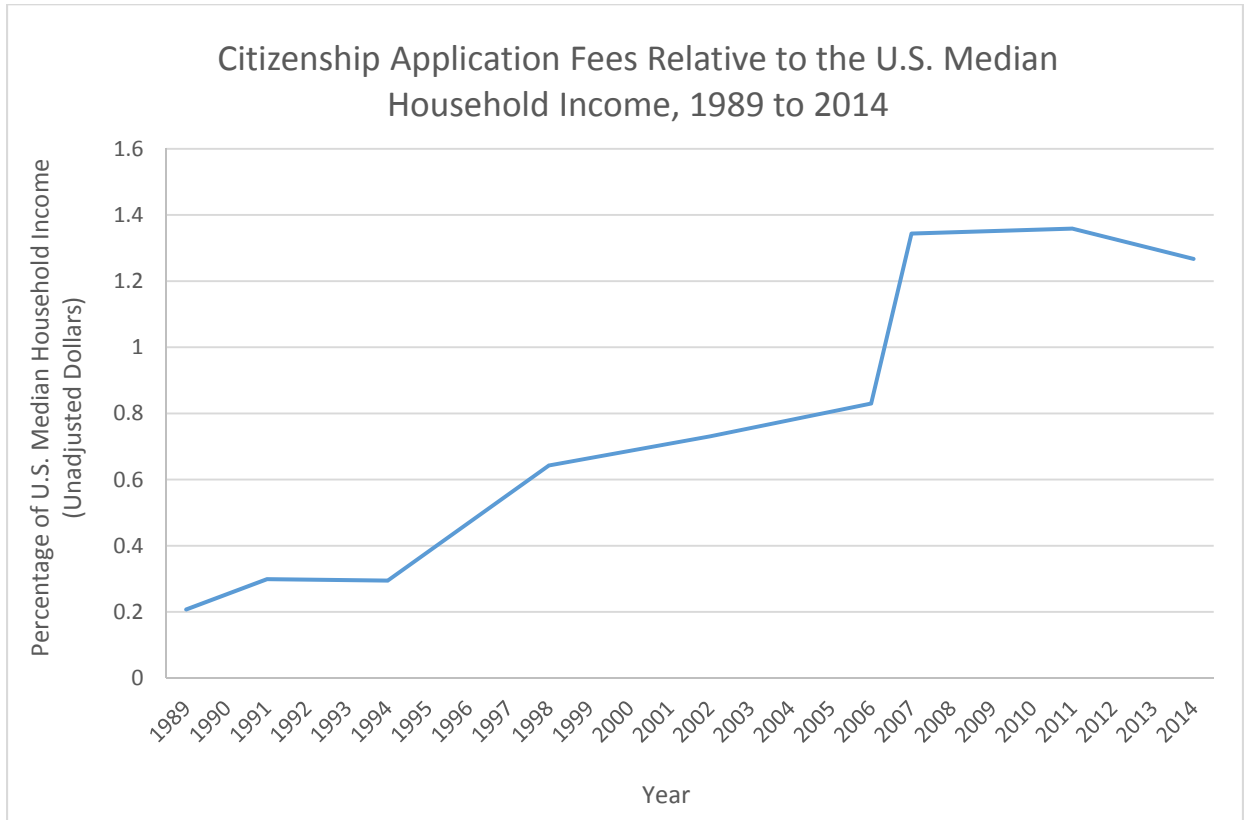
Figure 1: Trends in Citizenship Application Fees, FY 1989 to 2015*



*Note. The fees highlighted in Figure 1 are the prices that were in effect at the *end* of each respective fiscal year (September 30).¹³ Therefore, they do not represent the price fluctuations that occurred *during* a given fiscal year. For instance, FY 2007 ran from October 1, 2006 to September 30, 2007, with the application fee increase taking effect on July 31, 2007.

While some may argue that USCIS increased these application fees to keep up with inflation, an examination of these prices alongside historical median household incomes in the United States reveals that these fees have simply outpaced inflation and represent an increasing share of median household income. The \$60 fee in 1989 represented 0.21 percent of that year’s actual median household income, but in 2011, the application fee represented 1.36 percent—an almost 550 percent increase. (Figure 2)

Figure 2: Application Fees Relative to the U.S. Median Household Income, 1989 to 2014 ¹⁴



The largest fee hike in absolute terms took place during fiscal year (FY) 2007, with total costs rising from \$400 to \$675.

Figure 3: N-400 Citizenship Application & Biometrics Fees ¹⁵

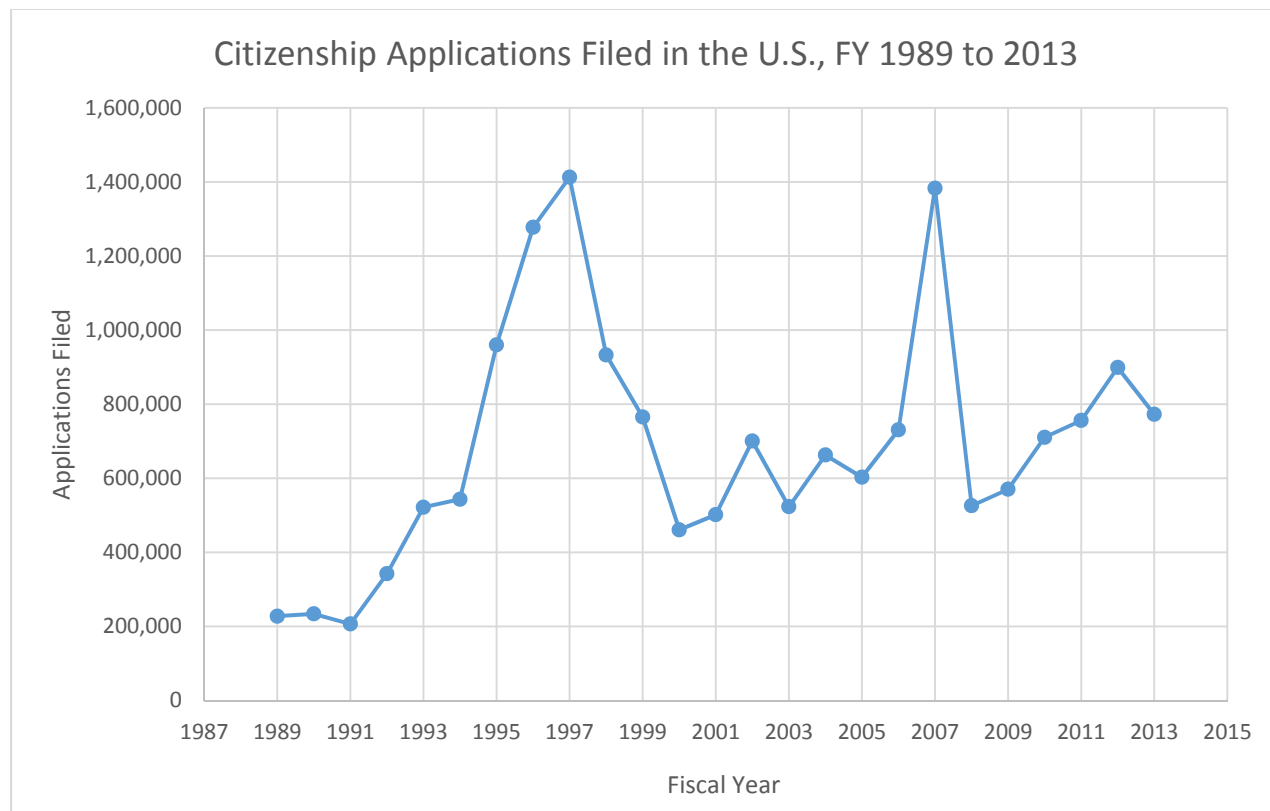
Fiscal Year	Application Fee	Biometrics Fee
1989	\$60	-
1991	\$90	-
1994	\$95	-
1998	\$225	\$25
2002	\$260	\$50
2006	\$330	\$70
2007	\$595	\$80
2011	\$595	\$85 ¹⁶

While application fees totaled \$675 at the end of FY 2007, many eligible immigrants wishing to naturalize were able to pay the \$400 fee under the previous fee structure before the price increase was implemented on July 31, 2007, hence the surge in applications during FY 2007.¹⁷

Consequently, as shown below in Figure 4, USCIS received 1,383,275 citizenship applications in FY 2007—the most since 1997 and an increase of 89 percent from FY 2006 (730,642 applications received).¹⁸ The next year, in FY 2008, USCIS received only 525,786 applications.¹⁹

Although a variety of factors could have contributed to this huge spike in applications in FY 2007, it is safe to assume that the impending \$275 fee increase was one of the key causes, particularly given that a similar spike occurred prior to a fee increase in FY 1998.

Figure 4: Citizenship Applications Filed in the United States, FY 1989 to 2013²⁰



III. THE HIDDEN COSTS OF NATURALIZATION AND THE BURDEN ON NEW YORK FAMILIES

Currently, USCIS offers fee waivers to individuals receiving means-tested public benefits or who are at or below 150 percent of the federal poverty level.²¹ However, as the ombudsman for the Department of Homeland Security recently found, the waiver process has long been plagued by problems, including confusing application forms and inconsistent decision-making.²²

Of course, even if all eligible immigrants were to receive fee waivers for the formal application, they would still incur a variety of hidden costs during the naturalization process. For instance,

many of these individuals must locate and pay for English and civics classes, take time off from work, and pay legal fees for consultations with immigration lawyers.²³

While there are several free English classes offered throughout the five boroughs, these programs have not been able to keep up with the growing demand. For instance, while the New York Public Library (NYPL) has expanded its free English class program by approximately 300 percent in the last three years—adding nearly 8,000 classroom spots—many libraries have still had to turn people away due to the immense popularity of these classes.²⁴ Although the NYPL aims to further expand this program over the coming years, immigrants who cannot secure a seat at one of these free programs typically must pay between \$350 and \$450 per week for group English classes.²⁵

Furthermore, many immigrants seek legal advice from immigration lawyers during the naturalization process. In New York City, immigration law firms usually charge between \$100 and \$300 for a one-time consultation and an additional \$1,200 to \$1,500 for help filling out the relevant paperwork and preparing the application package.²⁶

Given that approximately 40 percent of New York City's currently eligible-to-naturalize population speaks little to no English,²⁷ immigrants without friends or family members that speak English have little option but to rely on these lawyers for help navigating this complicated process.

In addition to these classes and legal consultations, time is another significant cost that must be factored into the application process. Since many immigrants throughout the five boroughs work long, unpredictable hours in occupations such as taxi drivers, construction laborers, housekeepers, and food preparation workers, finding the time and financial flexibility to fully commit to this process is incredibly challenging.²⁸

Given the high cost of living in New York City,²⁹ every hour taken off from work makes it even more difficult to make ends meet. This is particularly true for non-citizen immigrant families, whose median household income is approximately \$10,000 less than that of naturalized immigrants and about \$18,000 less than that of native-born New Yorkers.³⁰

As a result of these various costs and the barriers to securing waivers, many immigrants in New York City are forced to make a difficult choice between resorting to high-interest loans from predatory lenders to pay these fees or giving up on their dreams of citizenship.

IV. CASE STUDIES

Case Study #1

Choon is a 60-year-old man who immigrated to New York City from South Korea in 1990. He currently works six days a week at a laundromat in Jackson Heights, Queens, and lives with his wife in Sunnyside, Queens.

Choon first applied for U.S. citizenship in 2004, but he ended up failing the speaking portion of the test due to his limited English proficiency. Since then, he has always told himself that he would reapply, but over the years he has found it increasingly challenging to find the time and money to once again embark on the path to citizenship.

Since Choon works 14-hour days and lives paycheck-to-paycheck, he simply has not had the resources to prepare for the exam. “I don’t know why the application costs so much today,” he stated in Korean. “When I applied about ten years ago, it cost around \$300. A lot of people in New York City are struggling, and most of us don’t have this extra money lying around.”

When asked whether he would be applying for citizenship anytime soon, he stated, “I’m still nervous that my English isn’t good enough, so that’s been preventing me from applying, but I’m also worried about the price. \$680 is just too much.”

Note: Because of his age and years of permanent residency, Choon is actually eligible to take the citizenship exam in Korean.³¹ However, since he personally believes that a key part of obtaining American citizenship is the ability to speak English, he has decided to forgo the option of taking it in Korean.

Case Study #2

Evonny is a 23-year-old woman who emigrated from the Dominican Republic to New York City as an infant. A recent college graduate, Evonny works full-time as an educational counselor at a community-based organization in the Bronx, where she lives with her family.

Although she does not work long, unpredictable hours or need to take English classes like many other immigrants, Evonny still finds the \$680 price tag quite burdensome. In order to save money, she has been looking into receiving free assistance with her citizenship application.

“I’m currently living with my family, but because I recently graduated from college with loans to pay back, it’s not like I can just spend \$680 on an application,” she stated. “Plus, I work at a nonprofit, not on Wall Street; \$680 is a lot of money.”

Case Study #3

Natasha is a 26-year-old woman who immigrated to Astoria, Queens, from Eastern Europe at the age of 13. Although she has yet to reach the citizenship application phase of her journey, she is very much looking forward to the day when she can finally call herself an American citizen.

Natasha first applied for a green card when she got married at the age of 22, and she is currently waiting to adjust her status from temporary to permanent resident. Just getting to this point, however, has not been easy or cheap.

Throughout the past few years, Natasha has spent thousands of dollars and countless hours filling out forms and meeting with numerous immigration lawyers just to become a legal permanent resident, all while balancing work and marriage.

While she stated that the process of becoming a legal resident has been exhausting and somewhat depressing, she also noted that she has felt somewhat “privileged” throughout the entire process on account of her English proficiency. “This was a very challenging process, but because I speak English, I at least knew what these documents meant. I can’t imagine how much more difficult it must be for immigrants who don’t speak English that well.”

Despite that relative advantage, Natasha has struggled to pay for the costs associated with applying for a green card. Due to the high costs of legal consultations, she has had to plead with law firms for pro bono assistance, and is often left to rely on friends and internet forums to get the help she needs. She has even had to borrow money from her parents.

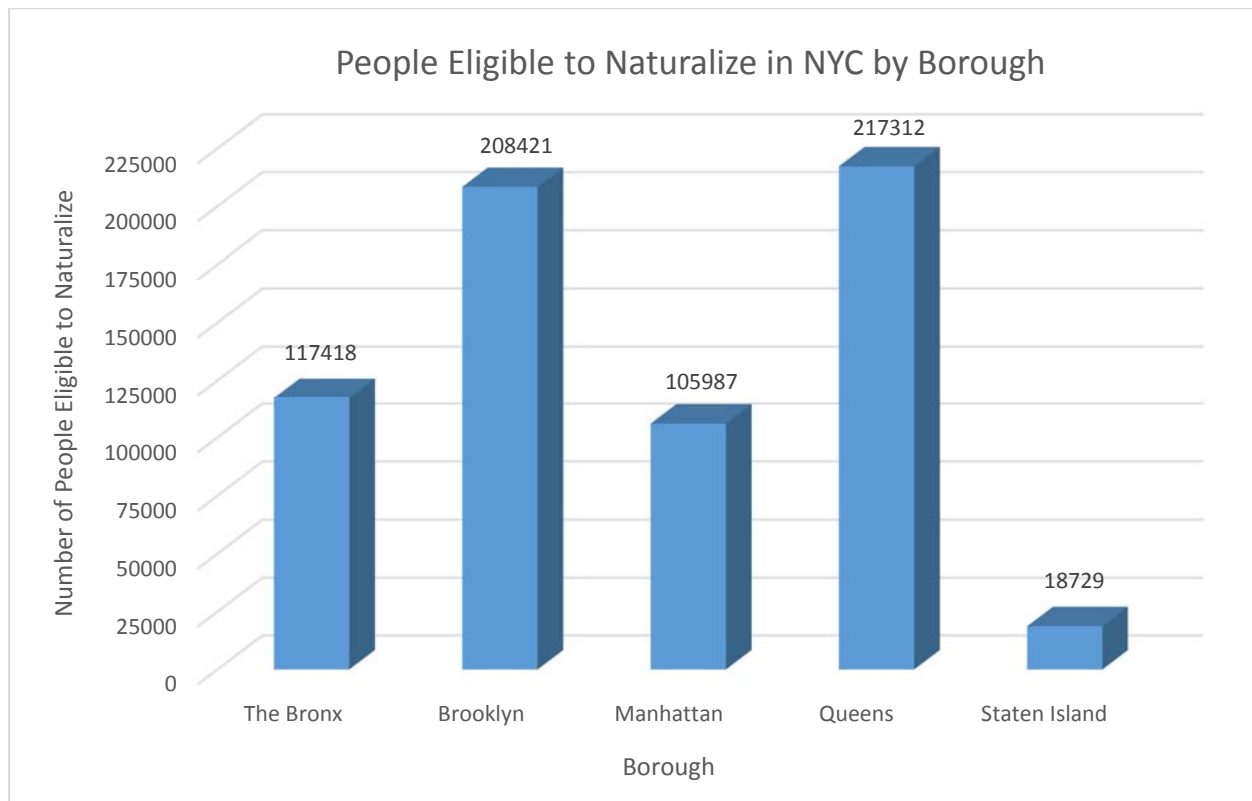
Given how much money and time must be invested to even become eligible for naturalization, it comes as no surprise that the \$680 price tag on the N-400 application leads many immigrants to defer or suspend their dreams of becoming U.S. citizens.

As Natasha described, “You just can’t do this on your own; this process is not financially feasible for most people.”

V. THE IMPLICATIONS OF EXPANDED CITIZENSHIP IN NEW YORK CITY

As one of the most important immigrant hub cities in the United States, New York City already boasts a large number of immigrants who can currently apply for citizenship. After Los Angeles, New York City has the second-largest population of eligible-to-naturalize Legal Permanent Residents (LPRs), with a total of nearly 670,000 individuals living throughout the five boroughs.³²

Figure 5: New York City's Eligible-to-Naturalize Population by Borough³³



Helping these 670,000 individuals become citizens, however, would do much more than just boost New York City's overall naturalization rate. Studies have shown that the benefits of citizenship extend far beyond the right to vote, and that increased naturalization rates are good for both immigrants *and* cities.³⁴

For instance, when compared to noncitizen immigrants, naturalized immigrants have access to a wider array of professional opportunities. This occurs because many public-sector jobs, especially those dealing with public safety, require citizenship. The New York Police Department (NYPD), for example, requires applicants to be U.S. citizens on or before the date of hire.³⁵

Furthermore, naturalized immigrants have access to more job opportunities because of the many positive traits and skills that citizenship represents.³⁶ To many potential employers, citizenship

indicates that an individual has a basic command of English, and that the candidate is planning to stay in the United States long term.³⁷ Also, citizenship reassures these employers that a candidate is here legally, allowing them to offer positions without having to worry about facing legal troubles for hiring undocumented workers.³⁸

As a result of these expanded professional opportunities, research has found that:

- Immigrants who naturalize in New York City experience increases in annual incomes of approximately \$1,975 to \$3,265;³⁹
- While nationally, naturalized immigrants experience an increase of about \$3,200.⁴⁰

Given all of these benefits, it is in New York City's best interest to address the high costs associated with citizenship applications and further support the integration of immigrants living throughout the five boroughs.

VI. RECOMMENDATIONS

Congress and the USCIS must take a series of steps to address the soaring cost of citizenship applications.

1. Instead of forcing USCIS to rely on fees for nearly 95 percent of its operating budget, the **federal government should provide additional resources to the agency in exchange for a reduction, and possible elimination, of fees.** Lowering the price, or eliminating the fee altogether, will have tremendously positive effects on overall naturalization rates in New York City and across the country, and in turn have a positive effect on our economy.

As researchers at the Center for the Study of Immigrant Integration and the National Partnership for New Americans found, naturalization is price sensitive, particularly to the differential between renewing a Green Card and obtaining citizenship.⁴¹ Indeed, a nationwide survey by the Pew Research Center in 2013 found that 93 percent of Hispanic immigrants who have not yet naturalized say they would if they could, with nearly 20 percent citing financial barriers as the main reason for their lack of action.⁴²

As of April 2015, USCIS was working on a fee review for the FY2016-FY2017 biennial period, which will determine the next adjustments to its fee structure.⁴³ As a result, it is imperative that Congress move quickly to address funding for USCIS in the next budget cycle in order to limit any possible fee increase for citizenship applications.

2. **USCIS should conduct more comprehensive fee studies and improve the waiver process.** Currently, the USCIS conducts a fee study every two years to assess whether its fees are aligned with the costs of providing its various services. Although the agency offers full fee waivers,⁴⁴ examining its fee structure more frequently will enable it to determine if it can lower any fees or offer *partial* waivers. This information should also be made available to the public to aid with organizational transparency efforts.
3. **USCIS should research alternative payment options.** In September 2015, USCIS began accepting credit cards as a valid form of payment for the first time.⁴⁵ While this is a major step forward, many eligible immigrants may not have \$680 on hand at any given time and others may not have access to credit. As a result, USCIS should explore the possibility of implementing a staggered payment system that enables eligible immigrants to spread these payments out over several installments.

Given the political gridlock in Washington, however, New York City cannot and should not wait for Congress to act. Instead, we should lead by example and encourage naturalization through a series of targeted initiatives.

1. **Engage community-based organizations (CBOs) and businesses on a public-private partnership to offer more “on-site” citizenship assistance programs in industries with large immigrant populations.** Recently, several companies in NYC have been able to offer their employees free on-site citizenship application assistance during the workday

through a partnership between the Mayor’s Office of Immigrant Affairs (MOIA) and a nonprofit project called the New American Workforce.⁴⁶ This effort should be expanded to more businesses throughout the five boroughs in an effort to boost the City’s naturalization rate.

2. **Increase funding for English as a Second Language (ESL) and civics classes.** To help reduce the hidden costs associated with the citizenship application process, the City should restore the 6,000 adult literacy seats that were cut from the last fiscal year’s budget,⁴⁷ and work more closely with organizations that already offer free English classes. By partnering with the City, these organizations will receive the exposure they need in order to increase their overall impact and acquire more funding for their programmatic activities.
3. **Expand free legal services for immigrants by partnering with local law schools and offering public interest fellowships.** Throughout the years, an increasing number of legal immigrants applying for citizenship have ended up in deportation proceedings due to unforeseen legal complications.⁴⁸ Organizations like the New York Legal Assistance Group,⁴⁹ the Legal Aid Society,⁵⁰ and CUNY Citizenship Now⁵¹ already provide free, high-quality legal services to immigrants throughout the five boroughs.

New York City should increase funding for these efforts, while also leveraging the power of local law school clinics, such as New York University’s Immigrant Rights Clinic (IRC),⁵² to provide additional legal representation for immigrants interested in naturalization.

4. **Engage in additional public-private partnerships to expand services, including innovative microloan financing programs.** MOIA estimates that nearly 30,000 parents with children in New York City public high schools are eligible to become citizens. Since 2012, the NYCitizenship in Schools program has targeted this population by providing free naturalization application assistance, as well as granting access to micro-loans and financial counseling to foreign born, non-citizen parents of New York City public school children.⁵³

Expanding these types of programs through public-private partnerships with organizations such as the non-profit Kiva, which uses crowdfunding techniques to offer microloans to low-income individuals, will help to steer immigrants away from costly predatory lenders and down a path to citizenship.

Similar programs in Maryland⁵⁴ and Illinois have already helped many immigrants achieve the dream of American citizenship.

5. **Create a NYC tax credit to encourage employers to subsidize citizenship applications.** Businesses throughout the five boroughs that employ immigrant workers should be given the opportunity to participate in a citywide program through which they subsidize a portion of their employees’ application costs in order to qualify for a tax credit.

Given the high costs of replacing low-wage employees,⁵⁵ it is in the best interest of these businesses to find innovative and mutually beneficial ways to retain their low-wage immigrant workers. By participating in this program and joining their employees on their journeys to citizenship, employers will be able to establish deeper bonds with their workers and help instill a sense of company loyalty.

VII. CONCLUSION

Emma Lazarus' famous poem at the base of the Statue of Liberty calls forth the "huddled masses" of the world with the eternal promise that America shall "lift [her] lamp beside the Golden Door." However, in recent years, while immigrants have continued to come to our shores, the U.S. has erected a series of barriers that limit the full participation of these immigrants in the life of the nation.

One such barrier is a sharp increase in application fees for American citizenship. Studies have shown that these soaring fees have forced many immigrants to put their citizenship dreams on hold, hurting both their families and our economy as a whole.

At a time when our nation's immigration policies continue to be heavily scrutinized and debated, New York City must lead by example by introducing policies and programs to combat these increasing costs and create an affordable pathway to citizenship for eligible immigrants across the five boroughs.

New York City has long benefitted from its reputation as the immigrant capital of the world by drawing people from every corner of the globe to put down roots, build businesses, and raise families. As a result, we have a unique responsibility—and economic interest—in ensuring that the golden door of opportunity remains open to everyone seeking to achieve the American Dream.

VIII. ACKNOWLEDGEMENTS

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Archer Hutchinson, Creative Lead and Web Developer; and Angela Chen, Senior Web Developer and Graphic Designer.

Endnotes

- ¹ <http://www.smithsonianmag.com/smithsonian-institution/madeleine-albright-welcomes-new-citizens-at-the-american-history-museum-113358467/?no-ist>.
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- ⁸ <https://www.fas.org/sgp/crs/homesecc/R44038.pdf>.
- ⁹ 8 U.S.C. §1356(m).
- ¹⁰ Ibid; USCIS has two smaller accounts that were created to receive monies to support specific purposes both within and outside the agency: the H-1B Non-Immigrant Petitioner Fee Account and the H-1B and L Fraud Prevention and Detection Fee Account. In addition, USCIS also receives a small portion of its budget through appropriations.
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- ²¹ <https://www.uscis.gov/feewaiver>.
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- ²⁶ The New York City Comptroller's Office called various immigration law firms located throughout Manhattan in order to obtain these price ranges.
- ²⁷ <http://cmsny.org/naturalization-by-puma/>.
- ²⁸ <http://www.osc.state.ny.us/osdc/rpt7-2016.pdf>; For instance, immigrants make up a staggering 87 percent of all taxi drivers and chauffeurs in NYC.
- ²⁹ <http://www.businessinsider.com/how-expensive-is-new-york-city-2015-9>;
http://nlihc.org/sites/default/files/oor/OOR_2015_FULLL.pdf; According to the National Low Income Housing Coalition, a household must earn an hourly Housing Wage of \$25.67 per hour, or work 117 hours per week at minimum wage, in order to afford the Fair Market Rent for a two-bedroom apartment in New York State.
- ³⁰ <http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>.
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