



# Bonding Against Adversity

*Helping Others Help Themselves*

February 28, 2024

**RECEIVED**

By ESEC at 8:25 am, Mar 12, 2024

The Honorable Alejandro Mayorkas  
Secretary of Homeland Security  
Washington, DC 20528

Dear Secretary Mayorkas:

Bonding Against Adversity, Inc, a non-profit organization, member of the Naturalization Working Group (NWG), write to urge you to approve the timely publication of the regulation titled "Citizenship and Naturalization and Naturalization and Other Related Flexibilities" (RIN 161S-AC80). It is our hope that this regulation contains provisions that would eliminate administrative hurdles to citizenship and clarify adoptees' and waiver recipients' eligibility to naturalize.

The NWG is coordinated by the NALEO Educational Fund and made up of national and local organizations committed to helping lawful permanent residents (LPRs) become U.S. citizens. The NWG strives to improve federal policies and practices related to naturalization and to educate legislators and other policymakers about the need to eliminate barriers to naturalization. Our coalition's expertise derives from its multiple member organizations that have significant experience in promoting naturalization and in assisting newcomers with the U.S. citizenship process, including immigrants who are serving in our military. The NWG is the policy complement to the New Americans Campaign (NAC), a diverse nonpartisan national network of respected immigrant-serving organizations, legal services providers, faith-based organizations, immigrant rights groups, foundations, and community leaders. The NAC transforms the way aspiring citizens navigate the path to becoming new Americans.

In our collective decades of practice assisting with naturalization, we have often seen regulatory changes have significant effect on LPRs' interest in and ability to pursue U.S. citizenship, naturalization rates, and the benefits that new Americans and the nation enjoy through naturalization of Lawful Permanent Residents. In instances ranging from increases in the cost to file a Form N-400 to the creation of rules governing requests for disability-based exemptions from English and civics testing, adoption of regulations has been associated with significant shifts in the number of applicants for U.S. citizenship and other outcomes. For example, the number of applications fell from almost 1.4 million in 2007 to just more than 500,000 in 2008 after a fee hike took effect. While factors other than the fee hike affected the difference in the number of applicants within these two years, we know that many of the LPRs served by our organizations filed in 2007 in anticipation of the fee increase. The recently published "Barriers to Naturalization" literature review from the Library of Congress in partnership with USCIS affirms our assessment of the effects of fee regulations.

In routine regulatory disclosures and language in the USCIS Fee Rule published on January 31, 2024, we have seen that the agency is preparing to issue a proposal to update regulations affecting naturalization. Our appreciation for the positive difference that potential regulatory updates could make compels us to ask you to act expeditiously in support of USCIS' rulemaking and

250 N Sam Houston Pkwy E  
Suite 304  
Houston, TX 77060

PHONE 832-330-6652  
FAX 832-360-4212  
EMAIL [tnburdette@baatexas.org](mailto:tnburdette@baatexas.org)  
WEBSITE <https://www.baatexas.org>

implementation of Executive Order 14012, Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans. Our organizations and the thousands of LPRs we serve each year can do the most good in their communities if proposed rules that facilitate naturalization are published in the very near term.

We urge you to rapidly approve publication of proposed regulations that increase access to U.S. citizenship by addressing the following, among other topics:

- Reducing administrative burden on LPRs whose green cards may expire while their naturalization applications are pending by codifying automatic extension.
- Streamlining and allowing for greater flexibility in the timing and other aspects of the submission of requests for disability-based test exemptions.
- Recognizing adoptees' U.S. citizenship; and
- Clarifying eligibility for citizenship of people granted inadmissibility waivers.

We appreciate the significant progress that USCIS has made to implement policies consistent with Executive Order 14012, which have reduced several barriers to naturalization. To sustain this momentum, we believe that expeditious action is important for the agency to publish proposed naturalization regulations. Earliest publication will help ensure that legal representatives, community leaders, and LPRs and their families can take confident action knowing the current Administration's policy changes, adopted in commitment to enhancing the accessibility of U.S. citizenship and immigrant integration, have the force of law.

Thank you for your consideration and consistent recognition of the benefits that naturalization confers on our nation.

Sincerely,



Thomas N. Burdette  
President and Chief Executive Officer  
DOJ Accredited Representative, Office of Legal Access Programs

250 N Sam Houston Pkwy E  
Suite 304  
Houston, TX 77060

PHONE 832-330-6652  
FAX 832-360-4212  
EMAIL [tnburdette@baatexas.org](mailto:tnburdette@baatexas.org)  
WEBSITE <https://www.baatexas.org>



U.S. Citizenship  
and Immigration  
Services

March 25, 2024

Thomas N. Burdette  
President and Chief Executive Officer  
DOJ Accredited Representative, Office of Legal Access Programs  
250 N Sam Houston Pkwy E, Suite 304  
Houston, TX 77060

Dear Mr. Burdette:

Thank you for February 28, 2024 letter to the Department of Homeland Security. I am responding on behalf of the Department.

I appreciate your interest in the subject matter. As your letter suggests, U.S. Citizenship and Immigration Services is actively working on a proposed rulemaking that will address many of the issues described in your letter. Upon publication of that proposed rule in the *Federal Register*, we invite the public, including you and your organization, to participate in the rulemaking process by providing your feedback according to the instructions provided in the proposed rule.

Thank you again for your letter and interest in this important issue. Should you require any additional assistance, please do not hesitate to contact the Office of Citizenship, Partnership, and Engagement at [public.engagement@uscis.dhs.gov](mailto:public.engagement@uscis.dhs.gov).

Sincerely,

A handwritten signature in black ink that reads "Ur M. Jaddou" followed by a long horizontal flourish.

Ur M. Jaddou  
Director