

June 28, 2016

Mr. León Rodríguez
Director
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Ave NW
Washington, DC 20008

Re: DHS Docket No. USCIS-2016-0001

Dear Director Rodríguez,

We write to express our concern regarding proposed increases to certain immigration and naturalization benefit request fees charged by U.S. Citizenship and Immigration Services (USCIS) that have to do with intercountry adoption.

The increases, in particular the 95 percent proposed increase for the Certificate of Citizenship (N-600, N-600k), would make intercountry adoption more expensive and even unaffordable for many families. This would leave children living in adverse conditions with diminished options for adoption into a permanent family.

We have heard from adoptive parents in our home states that the proposed increase in fees for the six forms listed below will have a negative impact on them financially and very well may deter others from adopting internationally. In addition, many families adopt siblings, so the fee increases would present a particular hardship for them.

We disagree with the following proposed increases:

| Form | Current Fee | Proposed Fee | Percentage Increase |
|--------------|-------------|--------------|---------------------|
| I-600A/I-600 | \$805 | \$860 | 7% |
| I-800A/I-800 | \$445 | \$470 | 6% |
| I-130 | \$420 | \$535 | 27% |
| I-130/I-485 | \$1,490 | \$1,760 | 18% |
| N-600/N-600k | \$600 | \$1,170 | 95% |
| N-565 | \$345 | \$555 | 61% |

We understand that USCIS conducted a comprehensive fee review and found that an adjustment to the fee schedule is necessary to fully recover costs for USCIS services and to maintain adequate service. However, the proposed increases will make adoption more expensive for many American families, and we are concerned that the disproportionately-high proposed increase for the N-600, the Certificate of Citizenship, may prevent families from obtaining this important certificate, which serves as proof of citizenship. If families elect to forgo the high cost of this

certificate, it would make it difficult for their adopted children to apply for jobs, register to vote, and apply for a U.S. passport in the future.

Public Law 106-395, the Child Citizenship Act of 2000, made acquisition of U.S. citizenship easier for internationally-adopted children and eliminated extra steps and costs. We continue to support the goals of that law. Intercountry adoption must remain a viable option for parents in the United States and for thousands of children overseas in need of a loving, permanent family. Therefore, we respectfully ask that you not increase the amount of the fees for forms listed above.

Thank you for your attention to this very important matter.

Sincerely,

cc: Samantha Deshommes, Acting Chief
Regulatory Coordination Division, Office of Policy and Strategy