



**Seattle**  
Office of Immigrant and  
Refugee Affairs  
**Cuc Vu, Director**

Submitted via [www.regulations.gov](http://www.regulations.gov)

Samantha Deshommnes, Chief  
Regulatory Coordination Division, Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW  
Washington, DC 20529-2140

Re: Docket ID USCIS-2010-0008 - Public Comment Opposing Proposed Changes to Fee Waiver Eligibility Criteria, FR Doc. 2018-21101 Filed 9-27-18; 83 FR 49120, 49120-49121

Dear Ms. Deshommnes:

The City of Seattle (City) submits this comment in response to the proposed rule published by the Department of Homeland Security (DHS) and the United States Citizenship and Immigration Services (USCIS) in their Notice of Proposed Rule Making published on September 28, 2018.

**The City of Seattle strongly opposes the proposed rule to modify the Form I-912, Request for Fee Waiver.**

The City of Seattle created the Office of Immigrant and Refugee Affairs (OIRA) in 2012 to improve the lives of Seattle's immigrant and refugee families. In line with the City of Seattle values of social justice and equity, OIRA works to strengthen immigrant and refugee communities by engaging them in decisions about the City of Seattle's future and improving the City's programs and services to meet the needs of all constituents. We believe supporting immigrants creates a stronger future for our nation. Just as previous immigrants did before, today's immigrants are tomorrow's U.S. citizens who will be fully engaged in the cultural and civic life of our society both locally and nationally.

To that end, OIRA funds and coordinates two naturalization programs called the New Citizen Campaign (NCC) and the New Citizen Program (NCP) to help an estimated 75,000 Seattle-area lawful permanent residents (LPRs) become U.S. citizens. We work with local and national partners to engage these LPRs via outreach, education, citizenship workshops, legal assistance, and case management.

The Form I-912 allows individuals with financial need to apply for certain immigration benefits without a filing fee. Fee waivers aid the most vulnerable immigrants, including refugees, asylees, unaccompanied minors, and victims of trafficking. For LPRs eligible to naturalize, it affords those unable to pay the \$725 filing fee the opportunity to achieve the dream of U.S. citizenship.

**About the New Citizen Campaign (NCC)**

The New Citizen Campaign (NCC) works with community partners to co-host events called "citizenship clinics" all over Seattle, serving an average of 30-50 individuals per month. Additionally, NCC has

organized large-scale events that have to date served 1,082 lawful permanent residents. Individuals are screened by volunteer immigration attorneys and Department of Justice (DOJ)-accredited representatives, and those deemed ready to apply are assisted in the completion of their N-400, and when necessary, the I-912 fee waiver application. Since 2016, NCC clinics and workshops have helped hundreds of applicants complete the I-912. Approximately 30 percent of clinic attendees qualify for a fee waiver, and the vast majority of those establish their eligibility with a public benefits letter.

### **About the New Citizen Program (NCP)**

The New Citizen Program (NCP) is a consortium of 12 community-based nonprofit organizations that provide ongoing free case management services to low-income immigrants and refugees living in Seattle/King County. Many of these clients are elderly, illiterate, disabled or have limited English skills. NCP attorneys and accredited representatives represent clients throughout the naturalization process, including preparation and submission of N-400s and I-912s, and disability waivers and appeals when needed. NCP services also include citizenship instruction/tutoring, interview preparation, and referrals for outside legal assistance in highly complex cases. In-language services are available in Mandarin, Vietnamese, Cambodian, Cantonese, Tongan, Samoan, Korean, Amharic, Tigrinya, Russian, Ukrainian, Romanian, Moldavian, Spanish, Burmese, Polish, French, and Arabic. Since its inception in 1997, NCP has served over 19,000 people, provided naturalization assistance to over 12,300 LPRs, successfully naturalized 9,500 LPRs, and provided over 90,000 hours of citizenship instruction.

To qualify for NCP services, clients must either receive a means-tested public benefit or be a low-income resident of Seattle. (Clients who receive a means-tested benefit may reside outside of Seattle; those who do not must reside within Seattle city limits and provide proof of their low-income status.) In 2017, 687 new participants enrolled in NCP. Among new participants, 87 percent, (595) were public benefits recipients. In 2017, 596 clients filed N-400 applications, and among these, 95 percent (569) filed an accompanying I-912. Only nine percent (53) of the 569 fee waiver requests filed were submitted by someone not on public benefits. These statistics are consistent with past years, where in fact, 97 percent (1237 out of 1276) of N-400 submissions in 2015 and 2016 had an accompanying I-912 application.

### **The proposed rule change would create an unnecessary paperwork burden for low-income lawful permanent residents attempting to become U.S. citizens.**

When conducting outreach in advance of an NCC citizenship clinic, the current process of informing fee waiver eligible attendees what supporting documentation to bring is relatively straightforward. We inform applicants who receive a means-tested public benefit to bring to the clinic what is called a public benefits letter. For many of our clients, this document is a simple piece of evidence that they already have or can easily obtain in a short amount of time. For those who fail to bring a benefits letter to the clinic, a fee waiver request can still be completed with instructions to insert the benefits letter before mailing in the application packet on their own.

In contrast, providing proper documentation for an income-based fee waiver is already difficult in the clinic setting. All applicants are asked to bring with them their most recent tax returns and recent pay stubs, but most applicants do not bring sufficient documentation because these items are more difficult to collect. Without sufficient proof of income, volunteer attorneys may be unable to complete their fee waiver request and will ask applicants to return to a future clinic with more evidence. Applicants who complete income-based fee waivers at a clinic despite missing evidence are sent home with instructions

to include further documentation before filing their I-912; these applicants are often overwhelmed and uncertain about what to include and usually do not complete the process on their own. Instead, they usually return to a future clinic, or become discouraged and do not pursue naturalization. Even clinic attendees who do bring adequate documentation of income often have their fee waiver requests rejected by USCIS and either return for additional assistance at a future clinic or give up on the process. We have considered avoiding income-based fee waivers at our clinics because of these difficulties.

If the proposed rule becomes final in its current form, preparing an income- or hardship-based fee waiver request would become even more difficult and time-consuming. The new income-based fee waiver request would require all applicants to submit the most recent year's tax return, plus recent pay stubs of any individual who contributes to the household income. Applicants who file an income-based fee waiver request are often overwhelmed by the documentation needed to establish eligibility. They will need extra time to collect these documents, lengthening the wait for them to become citizens. The time, confusion and difficulty of completing income-based fee waivers at our clinics will now apply to all fee waiver applicants.

This rule change will punish low income people because individuals who earn too little to be required to file taxes may not even have the required federal tax return to submit with the income-based fee waiver. Applicants who have experienced a reduction in income since filing their previous year's tax return may be stuck without any clear evidence to demonstrate current fee waiver eligibility, and would likely be forced to wait until the following year to have their tax returns reflect their new income level. Due to limited time and volunteer resources at workshops, we won't be able to help these individuals with their fee waiver requests at our workshops.

**The proposed rule change would cause inefficiency and overwhelm the limited resources of applicants, advocates and USCIS.**

The City recently asked New Citizen Program (NCP) service providers if and how this rule change, if implemented, would affect their work. Their responses varied somewhat, based on differences in agency size and client demographics, but all agreed that eliminating the public benefits basis of eligibility would have a significant detrimental effect on their clients, and in most cases, their organizations.

*I-912s based on income or hardship take more time to prepare.*

Eight-seven percent of new NCP participants enrolled in 2017 received public benefits, and 91 percent (516) of the I-912s filed in 2017 were done so on behalf of clients who received public benefits. NCP agencies report that they rarely, if ever, file an income- or hardship-based I-912 for someone who receives public benefits, since it is the most straightforward way to demonstrate fee waiver eligibility. Service providers agreed that, on average, it takes between 15 and 45 minutes to prepare an I-912 based on a client's receipt of public benefits. In contrast, I-912s based on income status or hardship might take upwards of two hours to complete, and many take much longer, if USCIS rejects the initial request which must then be resubmitted. Even in a best-case scenario, where the client has a properly-filed tax return and recent pay stubs in support of an income-based request, some advocates stated that the I-912 would take at least twice as long to prepare (between 30 and 90 minutes per I-912). If this extra time per case is extended to the roughly 516 public benefits-based I-912s filed by NCP agencies in 2017, this would equal approximately between 129 and 387 additional staff hours per year—a highly conservative estimate of the time burden imposed by the proposed rule change.

Consider an applicant who worked throughout 2017 but stopped working in early 2018 to stay at home with a new baby and has not returned to paid employment. That client, based on her 2017 tax return, might not be eligible for a fee waiver. Even though her household size is larger, if she is unemployed at the time she applies for the fee waiver, she will have no recent pay stubs to prove her current lack of income.

However, she may have become eligible for public benefits since leaving her job, and this would be the easiest way for her to demonstrate fee waiver eligibility. If she can't use receipt of benefits as the basis for her I-912, she will need to track down the 2017 tax returns and recent paystubs of any family members who contribute to the household income. In addition to these documents, her I-912 will need to 'explain' the basis for changes or inconsistencies between the 2017 return and the November 2018 status quo. For most people, this task is daunting without expert assistance.

NCP advocates elaborated on the challenges they have faced in filing income-based fee waivers:

*"The clients we have helped with income based fee waivers all have had more stable lives and work situations. If we have to do income based fee waivers for all our clients, I have a feeling they would be more complex due to less stable life and work situations and lack of access to good records."*

*"This will affect our clients, because their household resources change from year to year. For example, a family who might have made enough income last year due to their tax return might lose employment in the middle of the year or the family circumstances might change. It is hard to prove that they are low income and qualified for fee-waiver if we are only dependent on tax returns."*

Advocates stress that, in the vast majority of cases, income-based fee waiver requests take considerably more time to prepare than requests based on public benefits.

**The documents necessary for an I-912 based on income or hardship are challenging, if not impossible, for certain applicants to obtain.**

The proposed rule ignores the reality that many fee waiver applicants are not required to file tax returns, so the documents needed to support an income-based application are not readily available. Since the income-based ground explicitly requires a tax return, many individuals will be forced to qualify under the poorly-defined hardship ground or just give up, which means paying a filing fee they cannot afford or deciding not to apply.

Many low-income applicants do not work, or do not earn enough that they are required to file a tax return. Individuals who are single, under 65 and not blind, are exempt from filing if their earned income is less than \$12,000 (or \$400 for self-employment income). For those over 65, the threshold is slightly higher, \$13,600. For married individuals filing jointly, the minimum income ranges from \$24,000 to \$26,600, depending on the ages of the spouses. Many NCP clients are not required to file taxes due to their low incomes. Many NCP clients are retired elders (173 new participants in 2017 over age 65), and many are disabled and unable to work (150 N-648 disability waivers filed in 2017).

One of the larger agencies in NCP, which houses a separate program to assist clients in filing their taxes, explains that the additional burden—even with in-house tax help—would still be significant.

*"[W]e help clients to file income tax, or the clients do it by themselves. Most likely, these type of clients belong to the most vulnerable group, they can't find a way to file tax. At the end we have to do it for them. Based on my experience, we might have to write a letter to explain how the clients support themselves with ZERO income too. If it is rejected, we have to find other ways. So from a service provider's view, it would double or triple our time, plus explaining to the clients."*

For clients who do not file income taxes, the only clear proof of non-filing is a "Verification of Non-filing Letter" provided by the IRS. The request for this letter may be submitted online only if the individual has previously filed taxes; otherwise it must be done via regular mail. This letter only shows that the client did not file a federal tax return in a certain year—it does not verify their income or confirm that their income level exempted them from having to file a tax return. Clients who provide this letter in lieu of a tax return, even with additional proof of income like recent pay stubs, may have their I-912 rejected because the verification letter does not prove anything about the client's income status. Additionally, the letter cannot be requested from the IRS until June 15 of the year following the year in which a person did not file federal income taxes.

**I-912s based on income status or hardship are more likely to be rejected by USCIS, requiring additional time from service providers and USCIS adjudicators.**

The City asked NCP service providers the following: "For the I-912s based on income or financial hardship, were they accepted by USCIS the first time? If not, how many times did you have to refile? How much time did it take to refile?" Several service providers responded that these requests were rejected more often, and required them to refile, sometimes multiple times, before USCIS would accept them. Each time it was necessary to refile, the agency expended significant time (on average, over an hour) to contact the client, gather additional documentation and prepare a new I-912. NCC clinics often experience applicants returning to clinics with their denied fee waiver requests but without an understanding of what additional information they need. Clinic volunteers must inform these applicants what documents are needed and how to obtain them, then refer these applicants to yet another future clinic or to one-on-one services.

Fee waiver rejections also discourage and induce fear in applicants, which takes more service provider time to address. Applicants who receive a fee waiver rejection from USCIS often believe it is a denial of their entire application for naturalization. Service providers must take time to explain that it is possible to refile the fee waiver request and that this will not negatively impact their naturalization process, aside from the additional wait time in processing. Some applicants believe that USCIS will view their applications negatively because they are requesting a fee waiver, and the fee waiver rejection is further evidence for them that requesting a waiver is bad for their chances of naturalizing. This outcome is even more common with applicants from NCC clinics who do not always inform service providers of their fee waiver rejection.

As the vast majority of NCP clients receive public benefits, NCP service providers rarely file fee waiver requests based on income or hardship. In general, individuals who do not earn enough to file taxes are eligible for, and usually receive, public benefits, so hardship-based waivers are rarely the only option. Many NCP agencies do not file hardship-based I-912s, as they are too time-consuming to prepare, and based on experience, unlikely to be approved.

*"Filing based on financial hardship takes so long that I mostly don't do it. Generally people don't have the evidence required, or the evidence is unavailable."*

*"I've only filed a few based on financial hardship and they've been returned."*

*"I never tried hardship. I feel if the client income is between \$10,000 and \$18,000 (for one person), it would get approved. But if the income is extremely low, lower than \$2,000 to \$0, it will get rejected. USCIS only asks for income tax return."*

*"They [fee waivers based on hardship] are rarely approved, and usually the clients give up and pay the fee if they can."*

*"If current income used as proof (lower than tax return), [the fee waiver request is] rarely approved. Used current paystubs, but difficult to prove change in income (e.g., mother quit job to care for new born baby or ill child, only father making income...)"*

In proposing the new rule, USCIS contends that eliminating the public benefits ground will simplify the fee waiver process. This assertion is completely unsupported by our partners' experience. If income- and hardship-based waivers become the only options, the process will become significantly more complicated, especially for public benefits recipients who would not otherwise file income taxes.

#### **Redetermining the income status of public benefits recipients is a waste of government resources.**

Clients receiving means-tested public benefits have already had their incomes verified by a state agency with expertise in local wages and cost of living—why does USCIS want to second-guess this determination? Our tax dollars pay local and state agencies to determine whether someone qualifies as low-income. USCIS is proposing to reconsider this determination, which would take up significant adjudication resources, and increase already-huge backlogs in processing immigration cases.<sup>1</sup> USCIS will need additional resources to train officers in adjudicating the revised I-912. USCIS staff will spend additional time repackaging and returning the rejected applications. For applicants committed to obtaining the fee waiver, USCIS may review and reject the I-912 multiple times, incurring new postage fees each time.

There is some variation among states in what constitutes income eligibility for a means-tested benefit. An individual living in Washington State might qualify for state benefits with a higher income than someone living in Mississippi. While the Federal Poverty Guidelines differ for residents of Alaska and Hawaii versus the contiguous 48 states, this does not reflect the fact that the cost of living varies greatly among the 48 states. An individual living in Washington who qualifies for food stamps may earn slightly more than someone in Mississippi getting food stamps, but the higher cost of living in Washington means that the Washington resident is similarly unable to afford the \$725 filing fee for the N-400. As opposed to the Federal Poverty Guidelines, an individual's eligibility for local benefits is a far better gauge of their ability to afford the filing fee.

A study performed by the University of Washington School of Social Work examined the 'self-sufficiency standard', or the "amount needed to meet each basic need at a minimally adequate level, without public or private assistance."<sup>1</sup> It provides an in-depth look at the costs borne by workers, including

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<sup>1</sup> [http://selfsufficiencystandard.org/sites/default/files/selfsuff/docs/WA2017\\_SSS.pdf](http://selfsufficiencystandard.org/sites/default/files/selfsuff/docs/WA2017_SSS.pdf)

housing, food, childcare and transportation. The study found that a single parent with two children, a preschooler and a school-age child, living in Seattle, would need to earn \$33.37 per hour in a full-time job to be completely self-sufficient. Not surprisingly, the self-sufficiency standard was higher in Brooklyn (\$37.42) and San Francisco (\$37.71), and much lower in Atlanta (\$22.88) and Milwaukee (\$27.63). This data underscores the fact that the cost of living varies greatly throughout the country, a reality not reflected in the Federal Poverty Guidelines.

This proposed rule will also increase the workload of the Internal Revenue Service, as many individuals who are not required to file tax returns would be forced to do so in order to show income-based fee waiver eligibility. Significant IRS resources will also be needed to process requests for tax transcripts (Form 4506-T) or a Verification of Non-filing. By implementing this proposed rule, DHS would impose a significant, and wholly unnecessary, burden on the IRS. This increased burden, without additional resources allotted, will likely lead to delays in the IRS's production of requested tax documents.

### **The proposed rule change would directly harm low-income immigrants.**

While some clients would suffer nothing more than a delay in filing their immigration cases if this rule change goes into effect, many others will experience direct harm. Many clients, if they are unable to obtain the documentation necessary to support an income- or hardship-based fee waiver request, will be forced to take out a high-interest loan. Some clients will be forced to choose between paying an application fee and paying their other bills. Some applicants will have no choice but to give up on their applications because their fixed incomes do not allow them to save for a filing fee or pay back a loan. Among NCC clinic and workshop applicants who do not end up filing their naturalization applications, the top reason cited is not having enough money to pay for the filing fee.

Our partner agencies described specific ways their clients would be harmed:

*"This will affect almost all our clients. It will lengthen the time it takes to prepare their applications, and will make gathering all the necessary documents needed more time consuming and confusing. This will add stress and a potential barrier for many of our clients, potentially causing some to not move forward with their applications or having to use money essential to the well-being of their families."*

*"People significantly delay filing their cases because they are waiting to save money or find it, borrow it from family, etc."*

*"Cases are on hold because clients are sometimes not able to find certain documents to prove the financial hardship part."*

Delays in submitting a naturalization application are more than a mere inconvenience: they delay the client's ability to vote, submit petitions for family members, and obtain certain types of employment. The proposed rule will cause applicants to be delayed in filing their applications, not only from the time needed to obtain additional evidence in support of an income- or hardship-based fee waiver, but also from waiting longer to receive legal services at a nonprofit agency with reduced capacity due to the burden of this rule.

Some NCP agencies assist clients with green card renewals (Form I-90) when a client is not ready to apply for citizenship. Fee waiver rejections on the I-90 would lead to some individuals losing proof of

lawful status in the United States, which makes it harder to demonstrate eligibility to work, and eligibility to receive the life-saving public benefits on which they rely.

Individuals lacking proof of lawful status are in violation of federal law and face a greater risk of negative encounters with immigration officials, including detention and placement in removal proceedings. Residents of Seattle and King County are further at risk for expedited removal by U.S. Customs and Border Patrol due to their vicinity to the U.S.-Canada border. LPRs need valid proof of their lawful status, and making it harder to obtain a fee waiver for the I-90 compromises their stability and security in the U.S. The proposed rule subjects vulnerable populations to deeper poverty and possible arrest.

**The proposed rule change would drain the resources of U.S. Department of Justice (DOJ)-recognized agencies.**

This rule will greatly reduce the capacity of our nonprofit partners to effectively and efficiently serve their clients. All 12 NCP agencies are DOJ-recognized agencies staffed by DOJ accredited representatives. The DOJ's Office of Legal Access Programs (OLAP), which recognizes nonprofit agencies and accredits their staff members, was designed to increase access to legal services for low-income immigrants. OLAP's Recognition and Accreditation Program "aims to increase the availability of competent immigration legal representation for low-income and indigent persons, thereby promoting the effective and efficient administration of justice." This proposed rule would greatly undermine the ability of DOJ-recognized agencies to achieve a key component of OLAP's mission.

*"[NCP agency] will continue working for low-income people but the time we spend on each case will be much longer. I hope we can have more support from funder, either lower the goal or increase the fund."*

*"This rule change will change our client base and will change our funding opportunities to serve the low income immigrant and refugee community. This means only immigrants with higher income base will get priority when it should be the other way around. Lots of families will fall into the cracks. Our case management practices will change in that we will need to do outreach targeting the higher income communities. We might be forced to charge nominal fees."*

*"Fewer clients will apply. Longer wait times for our services because each case will take longer. I still don't know what we will use to show income if no tax return was filed."*

The resources needed to prepare income- or hardship-based fee waiver applications will overwhelm the limited resources of nonprofit agencies. Besides the additional time required to prepare the I-912, clients will also be confused about the documentary requirements, and providing extra help takes time. Each appointment to which the client does not bring the proper evidence for a fee waiver means additional staff time explaining which documents to bring to the next appointment and how to obtain them. This is time when staff would otherwise be preparing applications and attending client interviews at USCIS.

Collectively, the extra time expended per client will mean fewer clients served. As many grants to service providers are based on outputs and outcomes, serving fewer clients and performing fewer service activities may lead to reductions in outside funding. As funding decreases, agencies may be forced to lay off staff, further hampering their capacity to serve clients.



Staff layoffs make it harder for agencies to retain institutional knowledge and maintain DOJ recognition. DOJ accredited representatives must study immigration law and obtain practical work experience, often for several years, to attain this credential. They attend trainings to stay informed about changes to the law. Cuts to staffing are a waste of the finite resources spent on staff training and lead to a gutting of the knowledge base of an individual agency.

If the proposed rule change is implemented, NCP agencies would have to change their informational and educational materials, forms, and websites, incurring costs for design, printing and distribution.

**The proposed rule change will reduce the number of low-income individuals applying for naturalization, and thereby decrease the positive effects of naturalization.**

When a fee waiver request is denied, some clients pay the filing fee. Others are deterred from applying altogether. These individuals are delayed, if not permanently discouraged, from applying for U.S. citizenship. Naturalization applicants already face long wait times due to USCIS processing delays, and an inability to afford the N-400 filing fee further delays the opportunity to fully participate in voting and other civic duties<sup>2</sup>. By making it harder to obtain a fee waiver, USCIS creates an unnecessary obstacle to an immigrant's full participation in American society. Our government should be doing exactly the opposite of this: encouraging naturalization and making the process as accessible and efficient as possible.

Multiple studies show the economic gains associated with naturalization; becoming a U.S. citizen increases individual earnings eight to 11 percent<sup>3</sup>, which in turn improves family outcomes and the overall economy. By creating obstacles for families for receiving safety net assistance, USCIS is decreasing their opportunities for future economic wellbeing. A recent analysis performed by OneAmerica, a Washington State-based nonprofit, showed that would-be naturalization applicants lose out on significant income gains if fee waiver-eligible applicants decide not to apply for naturalization. If even 94 individuals (five percent of the population analyzed by OneAmerica) could not obtain a fee waiver, and therefore declined to apply for and obtain U.S. citizenship, their households would lose out on a combined \$300,000 (\$3,296 per person) in income for each year they failed to become U.S. citizens. This lost household income results in a decrease of more than \$1 million in future spending and revenue.

**In sum, the proposed rule creates massive inefficiency without any clear gain.**

**The City of Seattle strongly opposes the proposed rule to modify the Form I-912, Request for Fee Waiver.**

The City of Seattle opposes the proposed changes to the Form I-912 because it would cause additional obstacles for individuals applying, and otherwise eligible for, immigration benefits. The rule change will not improve efficiency or reduce costs for the U.S. government, and will likely cause significant additional costs and extended processing delays. The upside for the government is unclear. While USCIS may not have to adjudicate as many fee waiver requests, since some applicants will be deterred from seeking one, it will be left with a far more complex task. Instead of having a sizable portion of fee waiver

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<sup>2</sup> <http://partnershipfornewamericans.org/portfolio/npna-report-building-a-second-wall-uscis-backlogs-preventing-immigrants-from-becoming-citizens/>

<sup>3</sup> <http://newamericanscampaign.org/policy-makers/research/#citizen-gain-report>

requests based on the fairly straightforward public benefits standard, all I-912s will require significant documentary evidence. With applicants forced to be creative in demonstrating financial hardship, officers will require additional training in how to review fee waiver requests efficiently and fairly. This process will lead to many more rejections and re-filings, and this is a waste of time for everyone.

More importantly, the rule change will directly harm low-income immigrants, including those elderly and disabled. Nonprofit organizations charged with assisting low-income immigrants will be overwhelmed by the additional time burden imposed by the rule change and may struggle to stay afloat. This rule change would cause irrevocable damage to the New Citizen Campaign and New Citizen Program, their community partners, and the vulnerable clients they serve.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact me at [Meghan.kelly-stallings@seattle.gov](mailto:Meghan.kelly-stallings@seattle.gov).

Sincerely,



Meghan Kelly-Stallings  
Citizenship Program and Policy Specialist  
City of Seattle Office of Immigrant and Refugee Affairs

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