



NEW YORK CITY COMPTROLLER
SCOTT M. STRINGER

Bureau of Policy and Research



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The New York City Citizenship Fund: Expanding Access to Citizenship in the Five Boroughs



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Executive Summary

New York City has long been considered the immigrant capital of America, if not the world. Yet for many newcomers, making it past the Statue of Liberty and settling in the city is only the first stage of their journey. Having made New York their home, many aspire to become U.S. citizens. Indeed, in 2015 alone, almost 115,000 immigrants in New York City’s metropolitan area became U.S. citizens, amounting to 15 percent of the total number of new citizens nationwide, according to the Department of Homeland Security.¹

Nevertheless, many of New York City’s immigrants who are eligible to become citizens do not do so. Indeed, there are roughly 670,000 immigrants in New York City—20 percent of the total immigrant population in the city—who despite being eligible to apply for citizenship have not yet done so.² Neighborhoods with the highest numbers of eligible-to-naturalize New York City residents include Flushing, Washington Heights, Jackson Heights, Jamaica, Elmhurst, and Bensonhurst.³

This is in part the result of the cost associated with becoming a citizen, which includes the federal government’s application fee of \$725, a fee that has increased some 500 percent since 1989.⁴ To be sure, there can be other barriers associated with naturalization, including the need for some applicants to learn English or obtain legal services.⁵ But the federal government’s fee is a hurdle that all applicants must confront, either by qualifying for a federal waiver available to those at the lowest end of the income spectrum, or paying up front. Given that over half of those eligible to naturalize live below 250 percent of poverty, or less than \$51,050 for a family of three, these costs can be a real burden in a city as expensive as New York.⁶

This report, from New York City Comptroller Scott M. Stringer, proposes a new way of assisting the city’s eligible immigrants – the creation of the New York City Citizenship Fund, a public-private partnership designed to help more New Yorkers afford the federal application costs of becoming a citizen.⁷ By providing public funds to eligible immigrants living under 300 percent of poverty, or incomes of less than \$61,260 per year for a family of three, this report estimates that the City could cover the costs of some 35,000 applicants at a cost of approximately \$21 million.⁸ To defray these public costs or, alternatively, expand the universe of those helped, the City should also establish a public-private fund to leverage the good will of individuals, foundations, and others interested in helping immigrants take the final step to citizenship. This program would not take away from existing City-funded efforts that provide legal services to immigrants.

With the federal government recently expanding its immigration enforcement activities, the benefits of becoming a citizen are greater than at any time in recent history.⁹ By providing the security afforded by citizenship to more New Yorkers, the city can strengthen both families and the economy at large. New York City's 3.3 million immigrants comprise almost 40 percent of the City's total population.¹⁰ The extraordinary diversity, enterprise, and energy of immigrant New Yorkers defines our City's culture and powers its economy, comprising 46 percent of the City's workforce who together earn some \$100 billion annually in wages.¹¹

Citizenship not only brings with it the security of not being subject to deportation and the ability to vote, but has also been shown to increase employment opportunities, earnings, and ultimately tax revenues in a way that is good for *all* New Yorkers.¹² By creating such a program, New York City can affirm the important role of its immigrant communities and make our city a stronger and more welcoming place for all.

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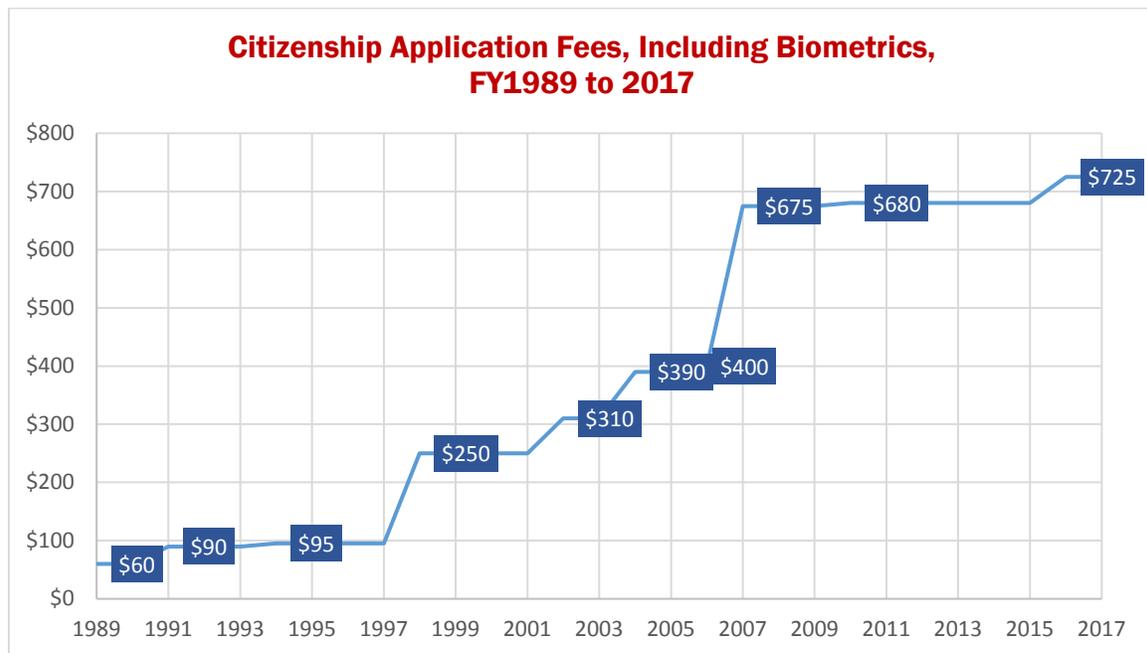
The New York City Citizenship Fund

Citizenship Today in NYC

In general, immigrants who are over 18 years of age and have been a permanent resident of the United States for at least five years may be eligible to naturalize and become U.S. citizens.¹³ According to a study from the Center for Migration Studies, there are about 670,000 immigrants in New York City, equal to about 20 percent of the total immigrant population in the city, who are eligible to apply for citizenship but have not done so.¹⁴

Under current law, an immigrant seeking to become a U.S. citizen must file form N-400 with the U.S. Citizenship and Immigration Service (USCIS). The cost to file the form is \$725, composed of a \$640 filing fee and \$85 biometric fee.¹⁵

As previously documented by the Comptroller's Office, and shown in the chart below, the cost of filing this form has skyrocketed in recent decades.



Note: The fees are the prices that were in effect at the end of each respective fiscal year (September 30). They do not represent the price fluctuations that occurred during a given fiscal year.¹⁶

Including biometric fees, the fees associated with the naturalization form have increased from \$60 in 1989 to \$725 today, an increase of 500 percent when adjusted for inflation.¹⁷

USCIS currently provides full and partial fee waivers for certain low-income immigrants that may have difficulties affording this \$725 fee. Any immigrant currently receiving a

means-tested benefit from the government, or can prove some financial hardship, or who have income under 150 percent of the federal poverty level can request a full fee waiver for the cost of naturalization.¹⁸ In addition, under a rule issued in October 2016 by the Obama Administration, immigrants with incomes between 150 and 200 percent of poverty may be eligible for a partial fee waiver and pay a reduced fee of \$405 (a \$320 filing fee and \$85 biometric fee) to file a citizenship application.¹⁹ However, as documented by the Citizenship and Immigration Services Ombudsman, the existing fee waiver program is burdened by a number of challenges that mitigate its effectiveness.²⁰

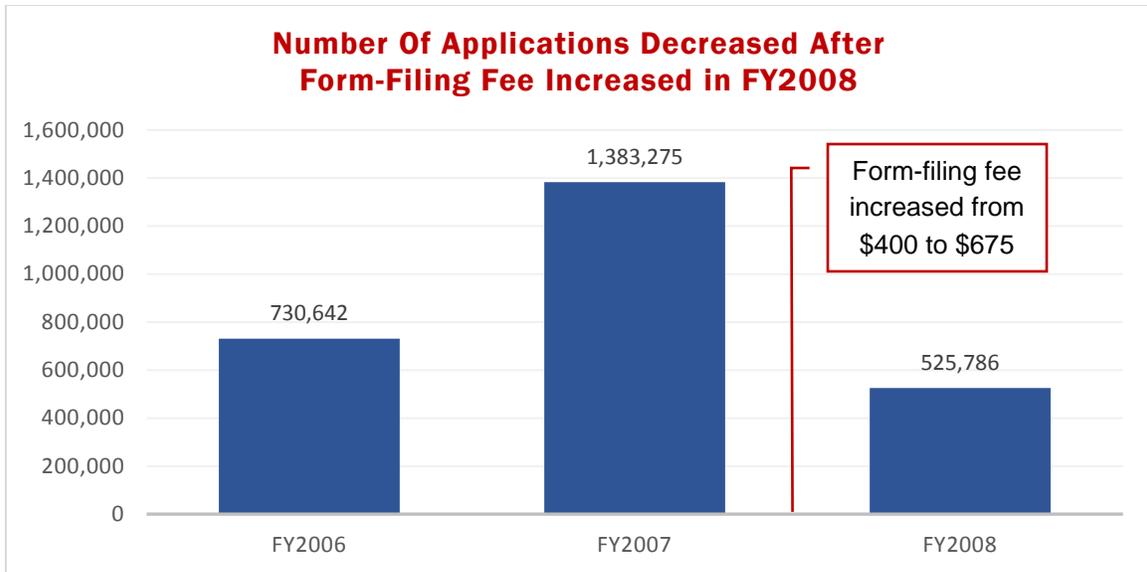
In addition to the federal government's fee reduction programs, New York State currently operates a program called NaturalizeNY that provides financial support to low-income immigrants seeking to become citizens through a lottery system.²¹ The program provides \$1.25 million to up to 2,000 immigrants with income between \$30,000 and \$60,000 annually. Vouchers for financial assistance are awarded monthly on the basis of a lottery operated by the 27 Opportunity Centers run by the State's Office of New Americans.²²

In recent years, New York City has also supported immigrants seeking to naturalize through legal services, although no City funds are provided to reduce the \$725 cost of filing an application. Through the NYCitizenship program, the Mayor's Office of Immigrant Affairs works with not-for-profit organizations to provide free legal help to people filing citizenship applications at locations including public libraries and schools.²³ However, providers report being unable to meet all of the recent increase in demand for these services at the same time as Attorney General Schneiderman has documented a rise in scams and frauds targeting immigrants in need of greater legal services.²⁴

Costs Remain a Barrier

Despite existing federal and state programs that help low-income immigrants better afford the costs of naturalizing, there is compelling evidence that the costs of citizenship remain a barrier and that additional support could help more eligible immigrants enjoy the benefits of citizenship. In fact, a large body of research demonstrates how the cost of naturalization may discourage eligible immigrants from becoming U.S. citizens.

As documented in prior work by the Comptroller's Office, the number of citizenship applications surged to 1,383,275 in FY2007, an increase of 89 percent from FY2006 (730,642 applications), after it was announced that the form-filing fee would be increased from \$400 to \$675 at the end of July 2007.²⁵ Once this increase took effect, however, the number of applications fell precipitously. With the increase in effect, in FY2008, only 525,786 applications were filed, a decrease of 62 percent from FY2007 and 28 percent from FY2006.²⁶



Based in part on these figures, researchers at the University of Southern California concluded that “the evidence suggests that the decision by an immigrant to naturalize is price sensitive, especially in relation to the less risky and less expensive alternative – renewing one’s Green Card.”²⁷ Increased fees were found to be particularly burdensome to immigrants with lower levels of educational attainment, who generally tend to have lower incomes.²⁸ Consequently, if the cost of applying for citizenship were lowered, it could encourage more eligible-to-naturalize immigrants to become citizens.

In addition, numerous comments were submitted to USCIS in 2016 when the agency was considering the most recent fee increase that expressed concerns about how fee increases would impact low- and moderate-income immigrants.

- Catholic Charities explained that “the high cost of this application is already an extremely significant barrier for many in the community in which we serve, especially for those not eligible for a fee waiver;”²⁹
- The National Immigration Law Center stated that, “the proposed increase to \$725 ... will only exacerbate the difficulty middle-income immigrants already experience in attempting to naturalize;”³⁰
- The National Council of La Raza wrote that the high cost of filing fees results in “many low-income immigrants instead [opting] to renew their LPR [lawful permanent resident] status rather than apply for citizenship;”³¹ and
- The Naturalization Working Group detailed that, “surveys and other research have shown that the high fees charged to naturalize are the most significant barrier for many who wish to become citizens ... LPRs who face particular challenges are lower-income and working class families who cannot afford the fees, but are not at the poverty level that would allow them to qualify for the USCIS’ existing fee waiver.”³²

Combined, these statements argue strongly that many immigrants, particularly those living near the poverty line who do not qualify for the fee waiver, may be discouraged from becoming a U.S. citizen as a result of the cost of the process.

Filing fees are only one component of the high costs associated with the naturalization process. For some, this could include English classes that cost between \$350 and \$450 per week, legal services that cost between \$100 and \$300 for a one-time consultation, and an additional \$1,200 to \$1,500 for assistance filling out the relevant paperwork.³³ Combined with the \$725 filing fee, these added costs could bring the total costs of naturalizing to well over \$2,000, a substantial sum of money in a city as expensive to live in as New York.³⁴



Creating the New York City Citizenship Fund

With the goal of helping to reduce the barriers to citizenship, New York City should create a public-private partnership program to help low- and middle-income immigrants become U.S. citizens. By developing the New York City Citizenship Fund, the City can cover the cost of filing citizenship forms with USCIS for eligible city residents with household incomes between 150 percent and 300 percent of poverty.

To administer the program, the Mayor’s Office of Immigrant Affairs would issue a Request-for-Proposals seeking a select number of not-for-profit organizations to administer the program. The not-for-profits would help applicants file their applications, confirm their eligibility for the program, and pay the applicable portion of the cost on behalf of the City directly to USCIS. Money would be distributed on a first-come, first-serve basis. To reduce the cost to the City and expand the program’s reach, it could be administered as a public-private partnership so that individuals, businesses, or charities could make contributions to help support immigrants seeking to become citizens. In building such a partnership, the Mayor’s Office of Immigrant Affairs could utilize its existing relationship with the Mayor’s Fund to Advance New York. Additionally, this program would enhance existing funding designed to provide legal services to immigrant New Yorkers in deportation proceedings.

The Comptroller’s Office estimates that such a program could support the citizenship applications of as many as 35,600 immigrants at a cost of \$20.7 million.³⁵ Appendix A includes the number of immigrants eligible to naturalize in each community district.

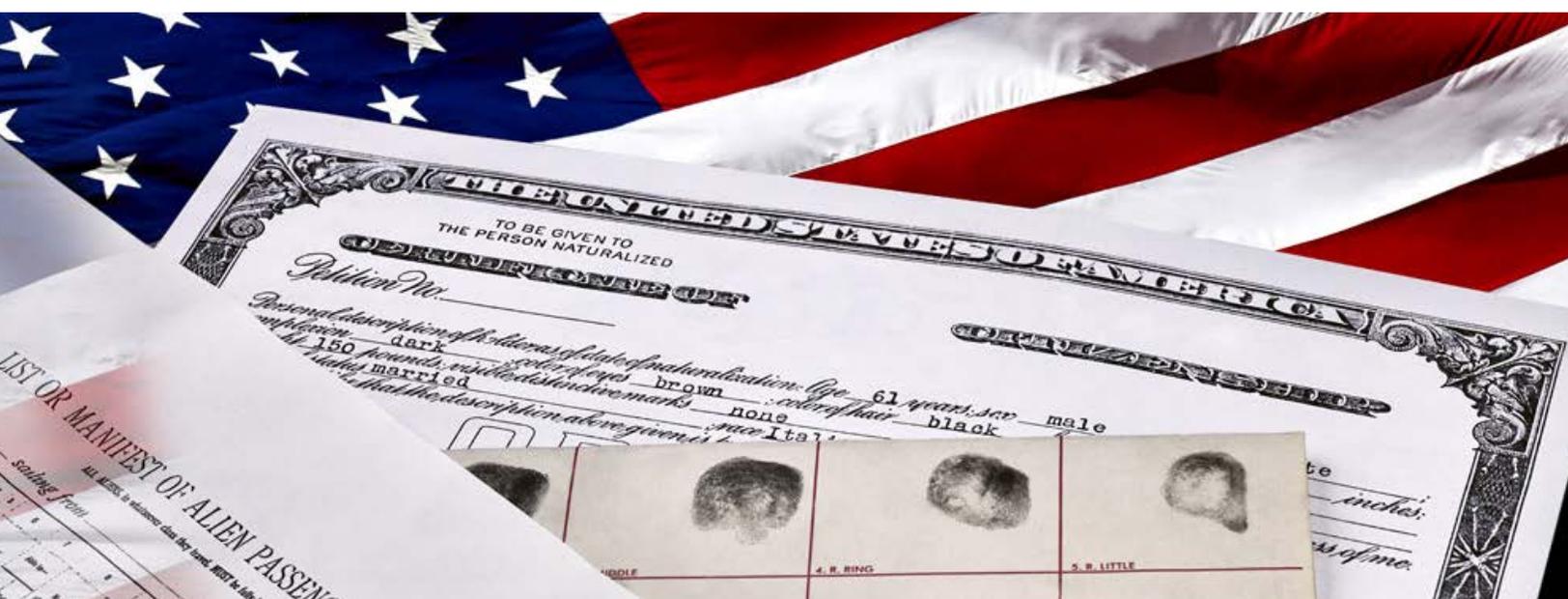
Becoming a U.S. citizen offers numerous benefits to the individual immigrants and broader society alike. As explained by the National Council of La Raza, the many benefits to becoming a U.S. citizen include:

- Immigrants who naturalize are likely to see an increase in wages, in part because most government and many government contractor jobs are reserved for U.S. citizens.
- Citizens are able to travel more easily, petition for family members to immigrate to the United States, and do not have to fear removal or family separation.
- Naturalization confers voting eligibility and other civic engagement opportunities.
- Newly naturalized citizens almost uniformly report other important, if intangible benefits: a stronger feeling of “belonging,” greater security when traveling with the protection of a U.S. passport, and a powerful sense of patriotism.³⁶

Researchers have generated specific estimates of the impact that becoming a U.S. citizen has on wages in New York City. Specifically, a study from the Center for Popular Democracy, the University of Southern California Center for the Study of Immigrant Integration, and the National Partnership for New Americans found that “immigrants who naturalize in New York City experience increases in annual incomes of approximately \$1,975 to \$3,265.”³⁷

This study further found that as a result of these higher wages, if New York City were to halve the size of the eligible to naturalize population in 10 years, it would increase revenues by between \$270 million and \$440 million.³⁸ In a similar vein, an estimate from Governor Cuomo’s office found that if all eligible immigrants in New York became citizens it would increase tax revenue by \$789 million and further reduce public benefit use by \$34 million, leading to a \$823 million benefit overall.³⁹

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Conclusion

As stated by Jessica Hahn, an attorney at the National Immigration Law Center, “access to the benefits of citizenship should not be predicated on wealth.” While that statement holds true across the country, it is particularly important in New York City, which is both the most expensive city in the country and the immigrant capital of the country. With reports of heightened interest in naturalization driven in part by stricter immigration policies being implemented by the Trump Administration, New York City can bring down the cost of citizenship and continue to be a beacon for immigrants from around the globe by enacting the New York City Citizenship Fund.⁴⁰

Acknowledgements

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Appendix A

Bronx

Community District	Neighborhood	Total Eligible to Naturalize
1 & 2	Hunts Point, Longwood & Melrose	13,159
3 & 6	Belmont, Crotona Park East & East Tremont	13,711
4	Concourse, Highbridge & Mount Eden	13,562
5	Morris Heights, Fordham South & Mount Hope	14,813
7	Bedford Park, Fordham North & Norwood	13,752
8	Riverdale, Fieldston & Kingsbridge	8,501
9	Castle Hill, Clason Point & Parkchester	11,497
10	Co-op City, Pelham Bay & Schuylerville	5,428
11	Pelham Parkway, Morris Park & Laconia	11,149
12	Wakefield, Williamsbridge & Woodlawn	11,846

Brooklyn

Community District	Neighborhood	Total Eligible to Naturalize
1	Greenpoint & Williamsburg	6,982
2	Brooklyn Heights & Fort Greene	6,282
3	Bedford-Stuyvesant	7,897
4	Bushwick	14,797
5	East New York & Starrett City	12,958
6	Park Slope, Carroll Gardens & Red Hook	7,034
7	Sunset Park & Windsor Terrace	20,979
8	Crown Heights North & Prospect Heights	8,405
9	Crown Heights South, Prospect Lefferts & Wingate	11,430
10	Bay Ridge & Dyker Heights	12,157
11	Bensonhurst & Bath Beach	21,510
12	Borough Park, Kensington & Ocean Parkway	9,347
13	Brighton Beach & Coney Island	6,964
14	Flatbush & Midwood	12,408

Community District	Neighborhood	Total Eligible to Naturalize
15	Sheepshead Bay, Gerritsen Beach & Homecrest	11,852
16	Brownsville & Ocean Hill	9,211
17	East Flatbush, Farragut & Rugby	15,549
18	Canarsie & Flatlands	12,659

Manhattan

Community District	Neighborhood	Total Eligible to Naturalize
1 & 2	Battery Park City, Greenwich Village & Soho	7,734
3	Chinatown & Lower East Side	12,054
4 & 5	Chelsea, Clinton & Midtown Business District	8,156
6	Murray Hill, Gramercy & Stuyvesant Town	4,785
7	Upper West Side & West Side	8,314
8	Upper East Side	11,356
9	Hamilton Heights, Manhattanville & West Harlem	9,935
10	Central Harlem	8,569
11	East Harlem	7,964
12	Washington Heights, Inwood & Marble Hill	27,120

Queens

Community District	Neighborhood	Total Eligible to Naturalize
1	Astoria & Long Island City	16,990
2	Sunnyside & Woodside	16,884
3	Jackson Heights & North Corona	23,170
4	Elmhurst & South Corona	21,694
5	Ridgewood, Glendale & Middle Village	13,478
6	Forest Hills & Rego Park	8,757
7	Flushing, Murray Hill & Whitestone	28,866
8	Briarwood, Fresh Meadows & Hillcrest	10,953
9	Richmond Hill & Woodhaven	14,456
10	Howard Beach & Ozone Park	8,980
11	Bayside, Douglaston & Little Neck	8,826

Community District	Neighborhood	Total Eligible to Naturalize
12	Jamaica, Hollis & St. Albans	22,991
13	Queens Village, Cambria Heights & Rosedale	14,950
14	Far Rockaway, Breezy Point & Broad Channel	6,317

Staten Island

Community District	Neighborhood	Total Eligible to Naturalize
1	Port Richmond, Stapleton & Mariner's Harbor	7,628
2	New Springville & South Beach	7,321
3	Tottenville, Great Kills & Annadale	3,780

Source: Center for Migration Study Analysis of Eligible to Naturalize Population available at <http://cmsny.org/naturalization-by-puma/>

Appendix B

In November 2015, the Center for Migration Studies estimated that there were about 667,867 eligible to naturalize individuals in New York City based on an analysis of each community district.⁴¹ An analysis of national poverty rates by researchers at the Center for the Study of Immigrant Integration & Center for American Progress found that 32 percent of the eligible to naturalize population live below 150 percent of poverty and 22 percent are between 150 percent and 250 percent of poverty.⁴² The survey further found that 27 percent live between 250 percent and 500 percent of poverty.

Extrapolating from these surveys we estimate that about 146,930 immigrants eligible to be citizens live between 150 percent and 250 percent of poverty and about 180,324 are between 250 percent and 500 percent of poverty. If approximately 20 percent of those 180,324 New York City residents were between 250 percent and 300 percent of poverty, then approximately 36,064 New York City immigrants would have incomes in that range. Relying on these estimates, this report assumes that approximately 182,994 eligible-to-naturalize immigrants have incomes between 150 percent and 300 percent of poverty.

Not all of these 182,994 people will either be able to or want to become citizens. We estimate that about 10 percent of eligible immigrants overall seek to become citizens in any given year, based on the fact that over the last decade about 90,000 immigrants have become citizens per year in New York, according to USCIS, or about 10 percent of the 915,000 people eligible for citizenship in New York State, according to Center for Migration Studies.⁴³ Therefore, if 10 percent of the 182,994 people between 150 percent and 300 percent of poverty became citizens, then it would be about 18,300 people in this income range benefiting from the program.

However, this analysis factors in allowances for the potential that the proposed program could also induce citizenship-eligible immigrants not currently considering becoming citizens to file for citizenship. In 2007, almost 90 percent more immigrants filed for citizenship in advance of a filing fee increase.⁴⁴ We incorporate a 90 percent increase in the population into our estimate of the number of immigrants who could benefit from the program.

Consequently, we estimate that there are 27,916 persons between 150 percent and 250 percent of poverty who could utilize the program, and 6,851 persons between 250 percent and 300 percent of poverty who could utilize the program. This totals about 34,770 people who would likely utilize the program.

Given the existing partial fee waiver program, the City's program would cover the \$405 cost for those between 150 percent and 200 percent of poverty and the full \$725 cost for those between 200 percent and 300 percent of poverty. We assume that half of the 27,916 persons between 150 percent and 250 percent of poverty are eligible for the existing partial fee waiver. On this basis we estimate that it would cost \$20.7 million to assist these 34,770 people.

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SCOTT M. STRINGER

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