

Form G-1482-004 Revision - Responses to 30-day FRN Public Comments

Public Comments (regulations.gov): [USCIS-2016-0002](#)

30-day FRN Citation (federalregister.gov): [88 FR 41980](#)

Publish Dates: June 28, 2023 – July 28, 2023

Comment #	Commenter ID	Comment	USCIS Response
1.		Commenter: Catholic Legal Immigration Network, Inc. (CLINIC)	
	0026 (see attachment)	On behalf of the Catholic Legal Immigration Network, Inc. (CLINIC), we submit the attached comments regarding USCIS-2016-0002 [OMB Control Number 1615-0140], Agency Information Collection Activities; Revision of a Currently Approved Collection: Citizenship and Integration Direct Services Grant Program	Response: See Comment Responses below labeled with Commenter ID: 0026. The information in the attachment from the public comment (0026) was separated into difference sections in this comment matrix to address each portion of information individually. See Comment # 2. – 3.
2.		Commenter: Catholic Legal Immigration Network, Inc. (CLINIC)	
	0026	<p>I. The Notice of Funding Opportunity language for the Regional Hub in future years should be amended to language in the FY 2022 NOFO.</p> <p>CLINIC appreciates the reinstatement of the regional hub grant for Citizenship and Integration for fiscal year 2022. The grant represents an opportunity for community organizations that have nascent or non-existing citizenship preparation programs to gain experience and receive technical assistance providing citizenship preparation classes and naturalization application assistance. The two-year period allows for programs to work towards sustainability in their citizenship preparation programs after the grant has ended.</p> <p>While we are encouraged that USCIS has decided to continue the Regional Hub Grant into fiscal year 2023, many of the requirements in the notice of funding opportunity (NOFO) changed</p>	<p>Response: Re: National organizations should be eligible –</p> <p>The Regional Hub program is intended to support growth at the city, county, state, or regional levels and it is expected that the Principal Applicant will be actively involved “on the ground” with subrecipient organizations. USCIS will take your input under advisement as we develop future NOFOs for this program to ensure that all organizations with the demonstrated capacity to implement the objectives of program are able to apply.</p> <p>Re: requirement that sub-recipients have experience –</p> <p>USCIS does not want to limit the ability to expand citizenship</p>

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	<p>significantly. These changes limit the number of principal applicant organizations that may apply for the grant and exclude national organizations that work to develop naturalization program assistance capacity building across the country. Furthermore, the language restricts sub-applicants to organizations that already have one of the two existing components of a citizenship preparation program already in-place and thus limits the capacity building potential of the grant.</p> <p>The specific language limiting national organizations from applying as the principal applicant are found in two locations. On page three of the NOFO, the word ‘national’ is excluded from ‘Objective 1’ defining the geographic scope of a citizenship network. On page 11, the NOFO requires that the principal applicant have <i>“Experience with and knowledge of the immigrant community to be served”</i> and <i>“An office that is located and operates in the defined city, county, or state where the network will be located.”</i> (see citation on attachment (1))</p> <p>Many national organizations are uniquely qualified to provide technical assistance for citizenship preparation programs. They have decades of experience helping to create and sustain immigration legal support programs, including the establishment and growth of naturalization programs. Organizations dedicate their resources by providing in-depth training on program management, specific legal immigration topics and processes, and in foundational legal immigration courses to help build capacity through</p>	<p>preparation programs to communities that are remote, rural, and underserved and will, therefore, take this point into consideration as future NOFOs for this program are developed.</p>
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		<p>recognition and accreditation. Furthermore, national organizations regularly collaborate with local affiliates and partners, educating one another on best practices in immigration legal services, programs, and practice. National networks are adept at big picture planning, implementation at the local level, allowing affiliates to differentiate according to local needs, and planning for sustainability. Finally, national organizations are highly experienced at managing complex grant opportunities involving extensive data reporting and coordination among multiple entities.</p> <p>The 2023 NOFO language for the regional hub program limits the number of local programs that can be considered as sub applicants under the grant. It requests that the subrecipients or eligible applicants have an existing citizenship preparation program with a need for technical assistance and a minimum of one year of experience of providing citizenship instruction and/or naturalization services. <i>(see citation on attachment (2))</i></p> <p>In contrast, the FY 2022 NOFO language states the ‘Role of the Sub-Applicant’ does not need to be currently providing citizenship preparation services or have previous experience doing so.³ By excluding inexperienced sub-applicants in FY 2023 grant opportunity, USCIS significantly limits the ability to expand citizenship preparation programs to communities that are remote, rural, and underserved. Furthermore, it denies capacity building opportunities to organizations that may have robust ESL programs and immigration legal</p>	
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		services, but which have not extended into citizenship classes or significant naturalization application assistance	
3.		Commenter: Catholic Legal Immigration Network, Inc. (CLINIC)	
	0026	<p>II. National Organizations should be allowed to apply for the Hub Grant in consecutive years.</p> <p>The FY 2023 NOFO for USCIS’s Hub Grant does not allow national organizations the opportunity to apply for funding in consecutive years.⁴ There are a range of benefits of obtaining funding consecutively. These benefits include the flexibility for applicants to refine their strategies and techniques to address new barriers or challenges as they arise in the community, among other opportunities. This presents a challenge to national organizations such as CLINIC, since it makes it harder to continue expanding capacity building in communities where access to naturalization and citizenship education is non-existent or intermittent.</p> <p>Previously, CLINIC received an award for \$1,000,000 for FY 2022 (DHS-22-CIS-010-001). Flowthrough funds were given to four nonprofits in Paterson NJ, Pomona CA, Hilo HI, and Plano TX. CLINIC supports and assists the sub-applicants as they expand the availability of high-quality citizenship preparation services. All sub-applicants have established partnerships in the local community to ensure easier access to the community. For example, Catholic Charities of Hawaii is partnering with a few local community centers to host citizenship and ESL classes. This is essential as Hilo is rural and access to such services can be limited.</p>	<p>Response: USCIS does not currently make awards under the Citizenship and Integration Grant Program to an applicant if it will result in that applicant having overlapping periods of performance for the same grant type (i.e. two Regional Hub grants, two CINAS grants, etc.).</p>

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		<p>Additionally, Pomona Economic Opportunity Center is partnering with the Motivating Action Leadership Opportunity “MALO” to engage with the Tongan community and Gente Organizada to target specifically parents whose schedule may limit their ability to attend citizenship preparation classes. All subapplicants promote integration in the classroom and participate with students in activities outside of the classroom such as having guest speakers, visits to local museums, and celebrating common American holidays.</p> <p>Most recently, CLINIC has direct experience with the past National Capacity Building Grant Program. CLINIC received a competitive award of \$500,000 for FY 2010-2011 (DHS-10-CIS010-002). CLINIC provided flow-through funds to four nonprofits in Buffalo, Cleveland, Detroit and Stockton, CA. CLINIC received a second award for \$600,000 for FY 2011-2012 (DHS-11- CIS-010-003). For that award, flow-through funds were given to four nonprofits in Worcester, Indianapolis, Syracuse and Los Angeles. Six of the eight sites were capacity building start-ups whereas two (Los Angeles and Stockton) were expansion efforts. Of the eight sites, seven immigration programs remain and have grown since the grants, while four programs went on to successfully compete for direct grants from the Office of Citizenship, or OoC. CLINIC’s previous National Capacity Building grants are an excellent example of sustained capacity building using OoC as a start-up funder.</p> <p>Through the series of the HUB grant, CLINIC has been able to assist a total of</p>	
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		<p>12 organizations to build and expand their capacity for citizenship education and naturalization services. USCIS should strongly consider allowing organizations apply for funding in consecutive years. This structure would allow the opportunity for sub-applicants to engage in peer-to-peer conversations, the ability to share best practices and learned experiences from one cohort to the next and vice versa. Additionally, with funding provided consecutively it would provide organizations flexibility to refine their strategies and techniques to address any new barriers or challenges that arise in the community. Finally, allowing national organizations to apply consecutively could potentially result in lowered administrative costs, such as providing trainings and technical assistance to overlapping cohorts, allowing more flow-through funding for local organizations</p>	
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