

Form N-600K-010 Revision Responses to 30-day FRN Public Comments

Public Comments (regulations.gov): [USCIS-2007-0019](#)

60-day FRN Citation (federalregister.gov): [88 FR 71585](#)

Publish Dates: October 17, 2023 – November 16, 2023

Total Comments: 3

Comment Author	Comment ID/Link	Comment	USCIS Response
jean publie	USCIS-2007-0019-0076	<p>us ciizens to not want mor eillegal imigrant made into citizens. most of them are here for money, solely for money. they should be stopped at teh us southern border and told to go back to their own country. this overwhelming invasion of foreigners to the complete and total depredaton of american citizens haveini to pay in massive amounts for their food, their rent, their telephones, their transport, their medical care, their schooling is causing excessively high taxes for american citizesn who are being force dinto porverty. this is an anti american move by a demented president who seeks to change the character of this country into ne divided into little pots of people fighting with each other frm all ove rth eworld. knid of like th ebalkan states. it is a bad move and there is no homogeneity i america left anymore. it will be destroyed with such a destructive plan as joe biden has in mind. it needs to be stopped. it is completely detrmental for any counrry to be so disorganized and have nothin in common. this cpmment is for the public rcord.</p>	<p>The commenter expressed an opinion on immigration issues generally. USCIS is making no changes to the form or instructions as a result of this comment.</p>
Immigrant Legal Resource Center	USCIS-2007-0019-0077 #1.1	<p>1) USCIS should include on the form a way to alert application processors and adjudicators that the child at issue for the N-600K is about to turn 18 years old such that those applications can be given priority before the child loses eligibility.</p> <p>Such a change could include a check box on the form in Part 1, Information about the Child’s Eligibility, and filing instructions on how to distinguish the application for adjudicators. We note with gratitude that the instructions now include a note that all aspects of the N-600K and related oath must be completed before the child turns 18, however, given the importance of this information to applicants, the form should also include a similar measure. Given the current USCIS backlogs, N-600K applicants about to turn eighteen will be unfairly disadvantaged if their cases are not prioritized. Further, processing times across the board for the form</p>	<p>USCIS has internal procedures that use the child’s date of birth to provide alerts when a child is nearing 18 years of age which is cause for expediting the application. Therefore, such an alert is unnecessary in the form itself. USCIS will not make any changes to the form based on this recommendation.</p>

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		N-600K are inconsistent. The Fiscal Year 2023 USCIS historic case processing time for the N-600K is currently seven months, which is four months longer than the disclaimer on the current and proposed form that indicates the application should be filed at least 90 days before the child’s 18th birthday. However, current processing times vary according to USCIS, such that an applicant would potentially need to file the N-600k several years before the child at issue turns 18, depending on the field office.	
Immigrant Legal Resource Center	USCIS-2007-0019-0077 #1.2	1 Continued: Further, USCIS should update the Policy Manual at 12 USCIS-PM H to include language prioritizing these applications. Previous guidance by the Immigration and Naturalization Services (INS) instructed local USCIS offices that immediate priority should be given to § 322 applications for children approaching their eighteenth birthdays. We encourage USCIS to add similar language in USCIS Policy Manual in Volume 12, Part H, Chapter 5: H. Citizenship Interview and Waiver In general, an applicant must appear in person for an interview before a USCIS officer after filing an Application for Citizenship and Issuance of Certificate Under Section 322 (Form N600K). This includes the U.S. citizen parent or parents if the application is filed on behalf of a child under 18 years of age.[22]USCIS, however, waives the interview requirement if all the required documentation necessary to establish the applicant's eligibility is already included in USCIS administrative records or if any of the following documentation is submitted along with the application.[23] Adjudicators should give immediate priority to § 322 applications for children approaching their eighteenth birthdays.	This comment is outside of the scope and USCIS will not make any changes based on this recommendation.
Immigrant Legal Resource Center	USCIS-2007-0019-0077 #2	2) USCIS should include gender-neutral language on the form and instructions for the child who is the subject of the form. The proposed form does not include a gender-neutral marker option for the child in Part 3, such as “Another Gender Identity.” Other recent form revisions from USCIS have included a non-binary option, and the proposed N-600K should follow suit. We note that the instructions replace binary options “he or she” with the gender neutral “they” and that the terms “mother” and “father” have been replaced by “parent” and the form should be	USCIS made changes to include gender-neutral marker option.

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		updated accordingly. USCIS should amend the form to include an option for nonbinary gender identities and should continue this practice in all form revisions in the future.	
Immigrant Legal Resource Center	USCIS-2007-0019-0077 #3	<p>3) USCIS should remove redundant information requests regarding adoption information.</p> <p>The information about the adoption in Part 4 – including the city, state, and country – is unnecessary on the form itself. Applicants have to provide proof of the legal adoption as part of the application, so the information on the form is redundant.</p>	USCIS considered the comment but will not make changes to the form based on it. The information requested in the form is needed for accurate adjudication of the application even if supporting documentation is provided as proof for it.
Immigrant Legal Resource Center	USCIS-2007-0019-0077 #4	<p>4) The note in Part 7 should be amended to instruct the applicants that they should skip Part 7 if the child’s parent is not deceased.</p> <p>If the child’s U.S. citizen parent is deceased and you are the child’s U.S. citizen grandparent or the child’s U.S. citizen legal guardian, provide information about yourself in Part 7. If you are the U.S. citizen parent, and you will rely on your U.S. citizen parent’s physical presence in Part 8., please provide your U.S. citizen parent’s (the child’s grandparent’s) information in Part 7. If neither of these scenarios apply, skip to Part 8.</p>	USCIS considered the comment and made changes as suggested. Additionally, similar instructions were added to the Form Instructions.
Immigrant Legal Resource Center	USCIS-2007-0019-0077 #5	<p>5) The new questions included in Part 1 regarding the eligibility of the child should be condensed to afford clarity for U.S. families stationed abroad. We acknowledge the agency’s efforts to ensure that only those who are eligible fill out the form and recognize that the aim with these questions is to determine if the child has already derived U.S. citizenship automatically. However, the additional questions may end up confusing applicants rather than clarifying anything. We suggest that the questions be condensed to cover all situations without adding unclear options.</p>	USCIS considered the comment but will not make changes to the form based on it. The information requested in these questions is specific to establishing whether the child may have already acquired U.S. citizenship under INA 320(c), as well as, whether the child is eligible for naturalization under INA 322(d).

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		<p>4. Is the child a lawful permanent resident?</p> <p>5. Are either of the child’s parents (or the spouse of either of the child’s parents) currently a member of the U.S. armed forces stationed outside the US or a U.S. government employee stationed outside the U.S.?</p> <p>6. Does the member of the US armed forces have official orders that authorize the child to accompany and reside with the member of the U.S. armed forces?</p> <p>7. If the child’s U.S. citizen parent is the spouse of the member of the U.S. armed forces, is the U.S. citizen parent authorized to accompany and reside with the U.S. armed forces member as provided by the member’s official orders?</p> <p>8. Are either of the child’s parents (or the spouse of either of the child’s parents) currently a U.S. government employee stationed outside the U.S.?</p>	
<p>Immigrant Legal Resource Center</p>	<p>USCIS-2007-0019-0077 #6</p>	<p>6) USCIS should amend the language on the proposed instructions on Page 2, Item 1 to ensure that those who acquire citizenship at birth are accounted for, as well as those who may have derived citizenship through “residing permanently” instead of admission as a lawful permanent resident.</p> <p>Many who acquire U.S. citizenship are not lawful permanent residents as they acquire citizenship at or after birth depending upon the law at the time of their birth. The language should be amended as follows:</p> <p>If the child has already acquired citizenship automatically under the INA through a U.S. citizen parent at birth or after birth. If the child was admitted to the United States as a lawful permanent resident, they may have already acquired citizenship. See USCIS</p>	<p>USCIS considered the comment and made changes to the Form Instructions. USCIS added more general instructions to cover the situations of acquisition at the child’s birth and after birth.</p>

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		Policy Manual at www.uscis.gov/policy-manual/volume-12-part-h A	
Naturalization Working Group	USCIS-2007-0019-0078 #1.1	While these changes are commendable, the agency can still improve upon the form. USCIS should include on the form a way to alert application processors and adjudicators that the child at issue for the N-600K is about to turn 18 years old such that those applications can be given priority before the child loses eligibility. Given the current USCIS backlogs, N-600K applicants about to turn eighteen will be unfairly disadvantaged if their cases are not prioritized. Processing times across the board for the form N-600K are inconsistent. USCIS reports a historic case processing time for the N-600K as seven months. However, current processing times, which vary by field office, exceed that estimate; substantially in some cases. Without a process for prioritization, applicants would need to submit their application several months or even years before their 18th birthday, which will not be possible for all applicants.	USCIS has internal procedures that use the child’s date of birth to provide alerts when a child is nearing 18 years of age which is cause for expediting the application. Therefore, such an alert is unnecessary in the form itself. USCIS will not make any changes to the form based on this recommendation.
Naturalization Working Group	USCIS-2007-0019-0078 #1.2	In addition to amending the form itself, USCIS should update the Policy Manual at 12 USCIS-PM H to include language prioritizing these applications. Previous guidance by the Immigration and Naturalization Services (INS) instructed local USCIS offices that immediate priority should be given to § 322 applications for children approaching their eighteenth birthdays. We encourage USCIS to add similar language in USCIS Policy Manual in Volume 12, Part H, Chapter 5 (citations omitted): H. Citizenship Interview and Waiver In general, an applicant must appear in person for an interview before a USCIS officer after filing an Application for Citizenship and Issuance of Certificate Under Section 322 (Form N600K). This includes the U.S. citizen parent or parents if the application is filed on behalf of a child under 18 years of age. USCIS, however, waives the interview requirement if	This comment is outside of the scope and USCIS will not make any changes based on this recommendation.

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		all the required documentation necessary to establish the applicant's eligibility is already included in USCIS administrative records or if any of the following documentation is submitted along with the application. Adjudicators should give immediate priority to § 322 applications for children approaching their eighteenth birthdays.	
Naturalization Working Group	USCIS-2007-0019-0078 #2	In addition, USCIS should amend the form to include an option for nonbinary gender identities. The agency has made strides in this area by allowing nonbinary gender markers in other proposed forms including the Form I-485, Application To Register Permanent Residence or Adjust Status, and the Form N-400, Application for Naturalization. Adding an option for those who do not identify as male or female is consistent with these changes and should be incorporated into the proposed N-600K as well.	USCIS considered the comment and made changes as suggested to include a gender-neutral marker option.
Naturalization Working Group	USCIS-2007-0019-0078 #3	Finally, we want to note that as strong advocates for access to the benefits of U.S. citizenship, many of our organizations previously have expressed our opposition to the \$215 fee increase proposed for Form N-600K in USCIS's Fee Schedule, published at 88 FR 402 on Jan. 4, 2023. The present filing cost of \$1,170 already poses a significant hurdle to potential applicants not qualified for full waivers. We urge USCIS to give appropriate weight to the importance of citizenship in its fee-setting process, and to reconsider the elevated fees it charges N-600K filers.	This comment is out of scope and USCIS will not make any changes based on this recommendation as part of this revision action. For additional information see the fee rule.