

Form I-912-026 Extension - Responses to 60-day FRN Public Comments

Public Comments (regulations.gov): [USCIS-2010-0008](https://www.regulations.gov/document/USCIS-2010-0008)

60-day FRN Citation (federalregister.gov): [91 FR 21300](https://www.federalregister.gov/documents/2026/04/21/91-fr-21300)

Publish Dates: April 21, 2026 – June 22, 2026

Comment ID/Topic	Comment Summary	USCIS Response
Topic 1. Preserve and expand access to form I-912	Commenter: NALEO Educational Fund	
1285	<i>A. Each means of qualifying for a fee waiver serves a distinct purpose and is important.</i> The current framework for fee waiver eligibility appropriately recognizes that economic hardship takes multiple forms. USCIS should preserve all existing pathways to qualify for a fee waiver. For example, applications based on means-tested benefits can be adjudicated efficiently. Eligibility based on receipt of means-tested benefits provides a clear and administratively efficient mechanism for adjudication. Applicants who receive benefits have already undergone financial eligibility screening by government agencies. Recognition of these determinations helps reduce unnecessary duplication of effort for both applicants and USCIS adjudicators. This pathway can be especially important for applicants who face broad logistical and linguistic obstacles in navigating the naturalization process. Elderly LPRs, for example, may struggle to match details of personal finances with categories and a Form that presume users are employed. In addition, the criteria of having income at or below 150 percent of the Federal Poverty Guidelines reaches people with limited incomes who are not eligible for means-tested benefits. Income-based pathways are equally necessary because many potential applicants and their families are ineligible for federal or state means-tested benefits despite experiencing financial hardship. Many applicants living modestly above poverty guidelines are unable to absorb filing costs that can total hundreds or thousands of dollars when combined with legal services, biometrics, travel, translation, and document procurement expenses. Preserving this pathway ensures that USCIS recognizes the economic realities facing working families. Finally, the financial hardship criteria ensure bad luck is not a barrier to becoming a citizen.	Response: USCIS announced that we were submitting an extension, without change, of a currently approved collection. USCIS does not propose any changes to fee waiver eligibility with this extension action for Form I-912, Request for Fee Waiver.

	The financial hardship provision serves a distinct and indispensable role because it allows USCIS to account for exceptional circumstances that standardized income metrics cannot capture. Sudden illness, caregiving obligations, domestic violence, unemployment, or natural disasters can rapidly destabilize a household regardless of annual income. Eliminating or narrowing the hardship pathway would unfairly exclude many deserving applicants and undermine the individualized review that USCIS appropriately emphasizes in the notice.	
1285	<i>B. Applicants should be able to file applications with fee waivers electronically</i> We strongly encourage USCIS to make Form I-912 available for electronic submission with naturalization applications and to permit fee waiver applicants to access the same digital filing options available to applicants who can afford to pay filing fees upfront. At present, applicants requesting fee waivers must rely on paper filing processes that are slower, less transparent, more prone to error, and more burdensome. This disparity effectively creates a two-tiered system in which lower-income applicants are denied access to efficiencies associated with online filing. It also complicates adjudication and raises costs for USCIS, which must take extra steps to handle, transcribe and digitize paper filings, and resolve intake errors that would not arise with electronic submission. If fee waiver requests could be submitted online, each group of stakeholders would benefit. The elimination of ambiguities in responses, mail delays, and document handling snafus would reduce problems for both applicants and the agency. In addition, legal service providers and accredited representatives could timely confirm submission of complete applications and could provide high-quality standardized application assistance to more people. Expanding online access for fee waiver requests is precisely the type of modernization contemplated by the Paperwork Reduction Act, so it is smart and strategic for USCIS to have previously committed to digitizing all of its forms and applications by FY2026. The agency must	Response: For certain eligible forms, Form I-912 may be submitted electronically with the form subject to the fee waiver request using the PDF Intake Process (PDFi) available through the USCIS online account. Submitting a benefit request concurrently with a Form I-912 through PDFi is the same as submitting a paper application. An applicant can upload the fee waiver request, supporting evidence, and submit Form I-912 concurrently with the related immigration benefit request. This PDFi functionality has been available since 12/18/2024.[]. USCIS is continuing to work to allow for more forms to be submitted electronically.

	live up to its promise and legal obligations.	
Topic 2. Fee Waiver Requests concerns	Commenter: NALEO Educational Fund	
1285	A request for a fee waiver should not trigger heightened scrutiny unrelated to the legal eligibility requirements for the underlying immigration service. The financial information provided in Form I-912 exists for the limited purpose of determining inability to pay application fees, and for most naturalization applicants, the economic circumstances described in a fee waiver request have no bearing on whether the applicant satisfies the requirements for citizenship. As they comply with an authorized process, fee waiver applicants should not be penalized, stigmatized, or subjected to unnecessary suspicion. A. Singling low-income households out for invasive, judgmental treatment is an extremely detrimental public policy because it deepens distrust and disengagement in communities. The practice of subjecting low-income individuals to disproportionate scrutiny discourages eligible people from any kind of engagement with institutions, and can erode trust in government. Communities are less likely to engage with public systems when they fear that requesting assistance may expose them to unrelated consequences or intrusive inquiries. Our organizations have repeatedly observed that fear and confusion about how government uses data can suppress participation in lawful immigration processes, even among fully eligible LPRs who are outstanding members of their communities. This result hurts us all and contradicts American values of fundamental fairness and dignity to all. Moreover, many naturalization applicants live in mixed-status households that include U.S. citizen children, LPRs, elderly relatives, and other dependents. Actions that discourage or destabilize one family member can reverberate across the entire household. If eligible LPRs applying for naturalization due to fear, financial strain, or distrust, families lose opportunities for economic mobility, civic participation, and long-term stability. Children in particular benefit when parents naturalize, including through improved economic outcomes and greater household security. 6 USCIS policies should therefore be	Response: USCIS officers review fee waiver requests and underlying applications or petitions in accordance with the law and USCIS guidance. This action is an extension, without change, of a currently approved collection. USCIS does not propose any changes to fee waiver eligibility review with this extension action for Form I-912, Request for Fee Waiver, including how submission of a Form I-912 affects an application for naturalization policy.

	guided by the recognition that facilitating access to citizenship promotes stability for both individual applicants as well as for millions of American families and communities. In this connection, some organizations providing naturalization application services have reported that applicants who filed fee waivers were the target of neighborhood investigations, where questions were raised about their eligibility or financial situation. We oppose the resumption of neighborhood investigations, because they are unnecessary, intrusive, based on subjective criteria, and result in arbitrary actions and decision-making. These concerns are even more salient when neighborhood investigations are conducted of LPRs who have applied for fee waivers.	
--	---	--