**December 30, 2019**



Chad F. Wolf

Acting Secretary

Department of Homeland Security

245 Murray Lane, S.W.

Washington, DC 20528

Kenneth T. Cuccinelli

Acting Director

U.S. Citizenship and Immigration Services

20 Massachusetts Avenue, NW

Washington, DC 20529

Paul Ray

Acting Administrator

Office of Information and Regulatory Affairs

Office of Management and Budget

757 17th Street, NW

Washington, DC 20503

Samantha Deshommes

Chief

Regulatory Coordination Division, Office of Policy and Strategy

U.S. Citizenship and Immigration Services

Department of Homeland Security

20 Massachusetts Avenue NW

**RE: United States Citizenship and Immigration Service (USCIS) Fee Increases, Docket No. USCIS-2019-0010**

Dear Mr. Wolf, Mr. Cuccinelli, Mr. Ray, and Ms. Deshommes:

The Archivists Round Table of Metropolitan New York (ART), a diverse group of more than 400 archivists, librarians, records managers, and information professionals in the New York metropolitan area, opposes the proposed changes to the fees for accessing the historic public records of the United States Citizenship and Immigration Service (USCIS). The changes outlined in the agency’s proposed rule under Department of Homeland Security (DHS) Docket No. USCIS-2019-0010 [[1]](#endnote-1) seek to significantly increase the fee for the agency to search the Master Index of the Genealogy Program from $65 to $240 (increase of 269%) and increase the fee to get reproductions of records from $65 to $385 (increase of 492%). We believe that these exorbitant fee increases would exclude many people from applying for a search and obtaining reproductions of these records.



Not only are we are alarmed by the devastating effect the proposed fee changes would have on the equality of access to these historical records, we are also alarmed that some of these historical records, dating from 1893-1975 [[2]](#endnote-2), have not been transferred to the National Archives and Records Administration (NARA), as per legally-binding records schedules. Once transferred to NARA, whose expertise is preserving and providing access to historical records of the federal government, the records will be managed more efficiently, accessed more freely [[3]](#endnote-3), and reproduced more economically (ranging from $3.50 to $4.00 instead of the proposed $385) [[4]](#endnote-4), therefore easing USCIS of what is clearly an overwhelming and unnecessary burden to USCIS staff and its budget.

Instead of creating inequitable and senseless financial barriers to USCIS services and records, and taking into account that the proposed rule makes reference to USCIS’ insufficient resources, ART respectfully urges you to withdraw the proposed rule on USCIS Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements (Docket No. USCIS-2019-0010), and to work with Congress to find more appropriate and less harmful means to address the agency budget shortfalls. Additionally, ART urges that USCIS work with NARA to immediately transfer the historical records of the agency to the National Archives, which has a clear statutory mandate, and existing expert processes in place to effectively and efficiently preserve and provide equitable access to USCIS records.

Thank you for your consideration.

Sincerely,

Archivists Round Table of Metropolitan New York

1. <https://www.federalregister.gov/documents/2019/12/09/2019-26521/us-citizenship-and-immigration-services-fee-schedule-and-changes-to-certain-other-immigration> [↑](#endnote-ref-1)
2. USCIS, Searching the Index: <https://www.uscis.gov/history-and-genealogy/genealogy/searching-index> [↑](#endnote-ref-2)
3. NARA, How to Obtain Copies of Records: <https://www.archives.gov/research/order> [↑](#endnote-ref-3)
4. NARA Reproduction Fees as of April 20, 2018: <https://www.archives.gov/research/order/fees> [↑](#endnote-ref-4)