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Submitted via email to: Policyfeedback@uscis.dhs.gov

September 29, 2025

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Office of the Director
20 Massachusetts Avenue, N.W.
Washington, D.C. 20529

RE: Policy Guidance Revisions: Volume 1, Part B; Volume 8, Part K; and Volume 12, Parts F & J

Dear Director Edlow,

The Catholic Legal Immigration Network, Inc. (CLINIC), respectfully submits the following comments related to proposed changes to USCIS policy and procedures found in the USCIS Policy Manual at Volume 1, Part B¹ and Volume 12, Parts F² and J.³ To improve efficiency in stakeholder feedback, these comments will address the following Policy Alerts: PA-2025-19, Transition to Electronic Payments; PA-2025-20, Good Moral Character, Unlawful Voting, and False Claim to U.S. Citizenship in the Naturalization Context; and PA-2025-21, Voter Registration at Administrative Naturalization Ceremonies.⁴ All three changes address language related to the naturalization process. These comments are based on the expertise of CLINIC's staff, who have extensive experience representing applicants before USCIS, as well as on insight from our Affiliates who regularly provide services to individual applicants directly and in workshop settings.

As we have since our founding in 1988 and by embracing the Gospel value of welcoming the stranger, CLINIC promotes the dignity and protects the rights of immigrants in partnership with a dedicated network of immigration legal services and programs. CLINIC's network, originally comprised of 17 programs, has now increased to more than 400 diocesan and community-based

¹ Volume 1: General Policies and Procedures, Part B, Submission of Benefit Requests, Chapter 3, Fees [1 USCIS-PM B.3].

² Volume 12: Citizenship and Naturalization, Part F, Good Moral Character, Chapter 5, Conditional Bars for Acts in Statutory Period [12 USCIS-PM F.5].

³ Volume 12: Citizenship and Naturalization, Part J, Oath of Allegiance, Chapter 5, Administrative Naturalization Ceremonies [12 USCIS-PM J.5].

⁴ USCIS, Policy Alert: Transition to Electronic Payments, [PA-2025-19](#); USCIS, Policy Alert: Good Moral Character, Unlawful Character, Unlawful Voting, and False Claim to U.S. Citizenship in the Naturalization Context, [PA-2025-20](#); USCIS, Policy Alert: Voter Registration at Administrative Naturalization Ceremonies, [PA-2025-21](#).

programs in 48 states and the District of Colombia. According to our 2025 internal survey of our Affiliates, over 90 percent of survey respondents provided legal services in naturalization and citizenship. CLINIC has great expertise in providing citizenship services, managing collaborative national and regional programs, providing training and technical assistance to local service providers, advocating for a fair and responsive immigration system, and promoting immigrant integration and civic participation.

The published changes to the Policy Manual would impede these goals. Therefore, we offer the following comments on USCIS's proposed changes to its policy and procedures.

I. General Comments

We appreciate this opportunity to provide feedback on the proposed changes to USCIS' policy and procedural changes. Due to the short period of time available to submit comments on these changes, CLINIC has decided to focus on the issues that impact our organization and our network the most. Omission from our comments of other changes in the Policy Manual should not be interpreted as tacit approval of those changes.

a. Procedural and Stakeholder Input Concerns

Regarding the time period that USCIS has established to submit comments on these Policy Manual changes, CLINIC asserts that 30 days is not sufficient time to analyze the changes or their potential impacts and to draft a meaningful comment in response. CLINIC has noted this issue repeatedly in the past. Given the critical changes to the Policy Manual, which will gravely impact naturalization applicants — particularly vulnerable populations — we urge USCIS to provide the public with a more reasonable timeframe to review and analyze changes and allow stakeholders to provide meaningful comments. To acknowledge multiple perspectives from the public, USCIS should increase the stakeholder feedback time period for Policy Manual changes. Given that all three notices are inherently linked and were released close in time, interested parties need ample time to properly respond.

USCIS' current practice of summarizing changes and posting the new version of the Policy Manual without redlined changes and the prior version of the implicated sections of the manual create additional obstacles for stakeholders' efficient evaluation of Policy Manual changes within the brief, 30-day comment period.⁵ Stakeholder engagement prior to and following USCIS' policy changes is a crucial aspect of an adjudicatory agency. When policy changes are made without any input from stakeholders, the agency loses the opportunity to discover ways in which the policy may be inefficient, counterproductive, or would cause unintended consequences. Also, stakeholders lose the opportunity to ask questions and understand the policy change before it goes into effect. These measures would help stakeholders to understand and correctly comply with reasonable changes and timely notify the agency when changes will create inefficiencies, unnecessary burdens, or fail to comply with the law. CLINIC recommends a 60-day timeframe, similar to that provided for proposed changes to forms and rules.

⁵ The feedback time for the policy manual changes was originally a shorter time frame of just 14 days. However, the current USCIS Policy Manual Feedback webpage states the response period was extended for an extra 17 days.

II. Specific Concerns About USCIS' Policy Manual Changes

Below, we will address CLINIC's concerns about how the changes to the Policy Manual impact vulnerable communities, the impact of voter registration in administrative oath ceremonies, and the issuance of NTA's during the naturalization process.

a. Impact on Vulnerable Communities

In FY 2023, USCIS had a \$61 billion operating budget, of which 95 percent was supported by fees.⁶ Almost one million naturalization applications were submitted that fiscal year,⁷ providing significant revenue to the agency. USCIS issued PA-2025-19, planning to phase out and transition on October 2025 from accepting paper-based forms of payment to accepting only credit or debit cards and creating a new form of payment through ACH transactions.⁸ Although CLINIC acknowledges USCIS' commitment to streamline payment processes and the overall adjudication of applications, there are significant concerns that this would disproportionately and negatively impact lawful permanent residents (LPRs) applying for naturalization.

While the addition of a new form of payment is useful and always encouraged, this policy change effectively eliminates historical options for LPRs to pay fees by paper checks or money orders. USCIS states in the policy alert that individuals will have access to paper-based payments only in limited circumstances, such as undue hardships or individuals who do not have access to bank accounts. However, given that USCIS has provided only two months' notice, the compressed timeline creates operational stress and may leave many naturalization applicants without adequate support. In addition, USCIS has yet to publish any guidance regarding procedures for any disputed ACH transactions, how to respond to errors made by USCIS staff when entering ACH information, or how privacy concerns would be raised when mailing sensitive bank information. CLINIC recommends USCIS continue investing in new revenue streams such as ACH transactions; however, it should continue accepting paper-based transaction payments and build guardrails for electronic transactions.

b. Voter Registration

For decades, USCIS and nonprofits have been trusted partners in naturalization ceremonies. In 2022, almost 40,000 new U.S. citizens were registered to vote by the League of Women Voters, one of the largest nonpartisan organizations assisting new citizens to register for their civic duty.⁹ Now, PA-2025-21 bars nongovernmental organizations from conducting voter registration activities at naturalization ceremonies. The policy alert specifies that state and local election officials will continue to be permitted to offer voter registration services at the conclusion of naturalization ceremonies. However, CLINIC is concerned that the implementation of this new

⁶ USCIS, Annual Statistical Report, FY 2023, pg. 5.

https://www.uscis.gov/sites/default/files/document/reports/fy2023_annual_statistical_report.pdf

⁷ *Ibid*

⁸ Form G-1650, Authorization for ACH Transactions

⁹ League of Women Voters, Blog: How LWV Registered 37,000 New Citizen Voters in 2022 April 2023.

<https://www.lwv.org/blog/how-lwv-registered-37000-new-citizen-voters-2022>

guidance will result in limiting new citizens from accessing their full rights, including the right to vote.

USCIS also does not provide any compelling reason why a nongovernmental organization should not be allowed to assist in voter registration at a naturalization ceremony. The Policy Alert cites the possibility that partisan organizations will provide these voter registration services. It does not, however, provide any statistical information or other data indicating either that such partisan organizations have provided these services before or that it would damage the interests of either naturalized citizens or the government. CLINIC recommends that USCIS continue to collaborate with nonpartisan and nongovernmental organizations during oath ceremonies as it promotes efficiency within the agency and does not strain local and state resources.

c. Contradictions in USCIS' Good Moral Character Policy

CLINIC is concerned that the policy guidance issued in February 2025, PM-602-0187, Issuance of Notices to Appear (NTAs) in Cases Involving Inadmissible and Deportable Aliens,¹⁰ regarding placing denied naturalization applicants into removal proceedings will disproportionately impact vulnerable applicants.¹¹ In tandem with Policy Memorandum 602-0189, Resumption of Personal Investigations of Aliens Applying for Naturalization (INA 335(a)) and PA-2025-20, the recent guidance changes on Good Moral Character (GMC) are both vague and contradictory for two reasons:

- 1) The language in PM-602-0189 states this policy will: “be implemented by the USCIS Policy Manual accordingly.” and “The purpose of the INA 335(a) investigation is to corroborate an alien’s eligibility for naturalization.”
- 2) The language in PA-2025-20 states: “USCIS may find that an alien has not met the good moral character requirement for naturalization if he or she has knowingly or unlawfully registered to vote or voted unlawfully in the United States.”

Although PA-2025-20 has an immediate implementation date for the GMC guidance, the recent GMC guidance regarding the resumption of personal investigation of applicants during the naturalization process does not have an effective date for when it will be applied to the Policy Manual. This creates undue hardship for individuals applying for naturalization as it strains agency resources and creates an inefficient process to investigate and adjudicate applications.

Additionally, the renewed GMC interpretation in PM-602-0189 of investigating positive attributes for naturalization contradicts PA-2025-20 and USCIS’ historical interpretation of GMC, which is defined in the statute in the negative. An applicant who has undertaken conduct specifically denoted in the statute within the relevant statutory period could *not* establish good moral character. For example, someone who is found to have been “a habitual drunkard” during the statutory period cannot establish that they are a person of good character for purposes of naturalization. PM-602-

¹⁰ USCIS, Policy Memorandum Regarding Issuance of Notices to Appear (NTAs) in Cases Involving Inadmissible and Deportable Aliens, https://www.uscis.gov/sites/default/files/document/policy-alerts/NTA_Policy_FINAL_2.28.25_FINAL.pdf

0188, on the other hand, requires USCIS officers to “account for an alien’s positive attributes and not simply the absence of misconduct.”

Further contradictions materialize between the policy alerts themselves. While PA-2025-20 states an applicant will automatically be issued an NTA if their N-400 is *denied* based on a presumed GMC violation of voting in a national, state, or local election, PM-602-0189 states that based on *positive* GMC attributes, “USCIS will make a decision to conduct or waive neighborhood investigations on an individualized basis,” and even then, USCIS may request additional evidence to determine whether or not to conduct a neighborhood investigation even though applicants could have previously submitted sufficient evidence in their naturalization application.

In essence, the recent changes to the GMC criteria in naturalization expand and, at the same time, contradict the guidance. This effectively impacts vulnerable communities, such as low-income, disabled, or elderly applicants, who might not have the necessary resources and finances to understand the implications if their application benefit is denied and are issued an NTA. CLINIC urges USCIS to exercise prosecutorial discretion in as many cases as possible in order to ensure continuing humanitarian protection and family unity for those vulnerable individuals.

III. Conclusion

We request that USCIS reconsider these proposed changes to the Policy Manual at Volume 1, Part B; and Volume 12, Parts F J. The phase-out of paper-based payments will have a detrimental effect for naturalization applicants. The exclusion of non-profits in voter registration during administrative oath ceremonies is contrary to USCIS’ interests. The recent GMC guidance is both vague and contradictory to USCIS’ historical policies.

We appreciate and encourage USCIS’s continued dialogue and engagement with the community and stakeholders. Thank you for your consideration of these comments. Please do not hesitate to contact Karen Sullivan, Director of Advocacy at ksullivan@cliniclegal.org, with any questions or concerns about our recommendations.

Sincerely,

A handwritten signature in black ink, reading "Anna Gallagher". The signature is fluid and cursive, with the first name "Anna" and last name "Gallagher" clearly legible.

Anna Gallagher

Executive Director