



February 7, 2020

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, Mailstop #2140,  
Washington, DC 20529-2140

Re: DHS Docket No. USCIS- 2019-0010—Genealogy Program

Dear Ms. Deshommes:

With the extension for comments, the International Association of Jewish Genealogical Societies (IAJGS) is submitting additional comments to you regarding the proposed regulations on fee increases for the genealogy program under the USCIS as reported in the Federal Register on November 14, 2019. The International Association of Jewish Genealogical Societies strongly objects to the exorbitant fee increases for this program.

In comparing the charges between what USCIS proposes and the following other records depositories, it shows how out of line are the USCIS proposed charges.

**Social Security Administration:**

Social Security Administration charges only \$24 for a photocopy of a person's original application for a social security card. [secure.ssa.gov/apps9/eFOIA-FEWeb/internet/main.jsp](https://secure.ssa.gov/apps9/eFOIA-FEWeb/internet/main.jsp)

**National Archives**

<https://www.archives.gov/research/order/fees>

examples: Minimum reproductions order (25 pages or less at the \$.80 rate.)      \$20.00  
Digitized microfilm publication black-and-white 35 mm or 16 mm roll, domestic US shipping  
\$125.00 per roll  
Archival Official Personnel Files (OPFs), 5 or fewer pages  
\$25.00 per package

**Library of Congress**

<http://www.loc.gov/duplicationservices/>

Under 20 pages, no fee  
E-mail, FTP or HTTP Download. \$5 min + \$1/file above 5 files  
<http://www.loc.gov/duplicationservices/order/>

California Department of Public Health  
Birth Certificate - \$25  
Death Certificate - \$21  
Public Marriage Certificate - \$15  
<https://www.cdph.ca.gov/Programs/CHSI/Pages/Vital-Records-Fees.aspx>

Maryland State Archive for birth certificate \$25.00  
<http://www.loc.gov/duplicationservices/order/>

New York City Department of Health and Mental Hygiene Birth Certificate \$15.00  
<https://www1.nyc.gov/site/doh/services/birth-certificates.page>

New York City Marriage Certificate \$15.00  
[https://www.cityclerk.nyc.gov/assets/cityclerk/downloads/pdf/mail\\_in\\_request\\_form%20final.pdf](https://www.cityclerk.nyc.gov/assets/cityclerk/downloads/pdf/mail_in_request_form%20final.pdf)

Virginia State Department of Health  
Certified copy of Birth Record \$12.00  
<http://www.vdh.virginia.gov/vital-records/genealogy/>

The above-cited examples from federal and state/municipality agencies are indicative of what other government agencies charge for certified and non-certified records. None come close to the outrageous fees the USCIS is proposing.

In 2006, when the USCIS proposed the establishment of a genealogy program, IAJGS supported the fee-based system with an affordable cost for the individual in obtaining the historical/genealogical records while understanding USCIS's need to cover its actual costs. We also did not oppose your fee increase a mere three years ago, when you increased your fees from \$20 to \$65 for both the search and the provision of the actual records.

However, with this proposal you do not include any information about your actual costs. We believe that it is incumbent on the department to justify the proposal by enumerating the actual costs taken into consideration.

### **IAJGS Recommendations**

IAJGS would strongly encourage USCIS to transfer all files eligible for transfer to the National Archives in accordance with schedules already in place where many of the records would be available for free at the National Archives or its Branches. If the Visa Files, Registry Files, and A-Files of people born more than 100 years ago were transferred to NARA, that would at least satisfy the current records schedules.

While some files have no index, we recognize that to answer requests for these documents is time consuming. IAJGS understands USCIS cannot transfer many older A-files because those files were never added to their Central Index System (CIS). As a result USCIS cannot find the files nor provide them to requesters. USCIS must develop and implement a plan to add these files to CIS so eligible A-files can be transferred to NARA.

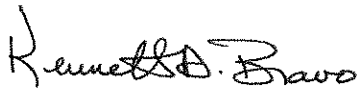
IAJGS is a sponsoring member of the Records Access and Preservation Committee (RPAC) and supports their proposal of charging an hourly rate not to exceed \$40 per hour in increments of one-quarter hour for

the time spent which is included in their separate submission to you, as well as their opposition to the proposed fee increases and with its recommendations.

The International Association of Jewish Genealogical Societies is the umbrella organization of 90 genealogical societies and Jewish historical societies worldwide whose approximately 9,000 members are actively researching their Jewish roots. The IAJGS was formed in 1988 to advance genealogical study, to elevate research standards and to provide a common voice for issues of significance to its members. Our societies' members include both professional and hobbyist genealogists. In 2020, we will hold our 40th consecutive annual International Conference on Jewish Genealogy (<https://www.iajgs.org>). One of our primary objectives is to promote public access to genealogically-relevant records.

Thank you for your consideration . If we can be of any assistance to the deliberations please feel free to contact Jan Meisels Allen at the email address below.

Sincerely,



Ken Bravo  
President, IAJGS Chairperson,  
[President@iajgs.org](mailto:President@iajgs.org)



(Mrs.) Jan Meisels Allen  
IAJGS Public Records Access  
Monitoring Committee  
[Jan@iajgs.org](mailto:Jan@iajgs.org) 1-818-889-6616

cc: US Senator John Cornyn, Chair, Subcommittee on Border Security and Immigration, Senate Judiciary Committee  
US Senator Richard J. Durbin, Ranking Member, Subcommittee on Border Security and Immigration, Senate Judiciary Committee  
US Representative Zoe Lofgren, Chair, Subcommittee on Immigration and Citizenship, House Judiciary Committee  
US Representative Ken Buck, Ranking Member, Subcommittee on Immigration and Citizenship, House Judiciary Committee  
US Senator James Lankford, Chair, Subcommittee on Regulatory Affairs and Management, Senate Homeland Security and Governmental Affairs Committee  
US Senator Krysten Sinema, Ranking Member Subcommittee on Regulatory Affairs and Management, Senate Homeland Security and Governmental Affairs Committee  
US Representative Xochitl Torres Small, Chair Subcommittee on Oversight, Management and Accountability, House Homeland Security Committee  
US Representative Dan Crenshaw, Ranking Member, Chair Subcommittee on Oversight, Management and Accountability, House Homeland Security Committee  
David S. Ferriero, Archivist of the United States