

USCIS Is Placing a Processing Hold and Re-Reviewing All Immigration Benefit Applications Filed by Applicants from the 19 Travel Ban Countries and Pausing the Processing of All Pending Asylum Applications

by Ieva Aubin, J. Mike Sevilla, and Henry Adebisi

On December 2, 2025, U.S. Citizenship and Immigration Services (USCIS) issued a policy memorandum directing agency personnel to: (1) place a hold on pending immigration benefit requests for individuals from the 19 countries designated as “high risk” under Presidential Proclamation 10949; (2) conduct a comprehensive re-review of approved benefit requests for individuals from the 19 travel ban countries who entered the U.S. on or after January 20, 2021; and (3) place a hold on all pending Form I-589 asylum applications. The memorandum mandates that all individuals falling into one of the above-listed categories undergo a thorough re-review process, including a potential interview and, if necessary, a re-interview, to fully assess all “national security and public safety threats along with any other related grounds of inadmissibility or ineligibility.”

Analysis of USCIS Policy Memorandum

The memorandum impacts individuals from the following 19 travel ban countries: Afghanistan, Burma, Chad, the Republic of Congo, Equatorial Guinea, Eritrea, Haiti, Iran, Libya, Somalia, Sudan, Yemen, Burundi, Cuba, Laos, Sierra Leone, Togo, Turkmenistan and Venezuela will have their benefit requests put on hold. For individuals from one of the 19 travel ban countries, the applications that will be placed on hold and potentially re-reviewed include, among others:

- Form I-485 Application to Register Permanent Residence or Adjust Status;
- Form I-90 Application to Replace Permanent Resident Card Green Card;
- Form N-470 Application to Preserve Residence for Naturalization Purposes;
- Form I-751, Petition to Remove Conditions on Residence;
- Form I-131 Application for Travel Documents, Parole Documents, and Arrival/Departure Records.

Reports from immigration practitioners indicate that applicants from the countries listed above, even if they hold additional citizenships, have already seen an impact to pending applications, including cancellation of naturalization oath ceremonies.

Related People

- Ieva Aubin
- J. Mike Sevilla
- Henry Adebisi

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USCIS acknowledges that additional reviews will delay adjudication of pending applications. The agency justifies the delays by the countervailing need to ensure that all asylum applicants and immigrants from high-risk countries do not pose national security or public safety threats.

Employer Considerations

Employers should:

- Conduct an internal review to determine whether any of their foreign national employees or candidates are impacted by the new policy.
- Consider the impact to potential new hires from the 19 travel ban countries.
- Anticipate the processing delays and increased adjudication time for immigration benefits.
- Be prepared to address potential gaps in work authorization for the impacted employees and related business impact.
- Develop processes for employees who may have their immigration applications re-reviewed and whether to engage counsel.

Dorsey's immigration team is actively monitoring these evolving developments and is available to work with corporate clients to strategize cost effective immigration solutions.