



IRAP Explainer on New Trump Administration Policies Impacting Refugees, Asylum Seekers, Afghan Nationals, and Immigrants from Countries Listed in the Travel Ban

In November and December 2025, the Trump Administration announced multiple policies impacting hundreds of thousands of refugees, asylees, visa applicants, green card holders, and other immigration benefit applicants. This Explainer lists each of the policies and answers questions about the general impacts.¹ For impacted communities, we recommend consulting and sharing [IRAP's legal information website](#), which contains guides in multiple languages on [recent U.S. policy changes](#), information on requesting assistance from IRAP, and links to directories of immigration attorneys and legal aid organizations. Below, we list the policies covered in this Explainer organized by who is impacted by the policy.²

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¹ Many of these policies were announced after the tragic shooting of two National Guard members. IRAP [condemns](#) the horrific violence, and urges the government not to engage in collective punishment based on nationality.

² Many individuals will fall into more than one group listed below and be impacted by multiple policies. The policies listed below were recently announced and, as a result, there are many uncertainties because official guidance may not have been developed or released to the public. Additionally, some policies may be challenged in court.

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Refugees Who Were Admitted to the U.S. From January 2021 - February 2025

Reviewing and Revetting Cases of Resettled Refugees & Pause on Adjustment of Status for Refugees

1. What is the new policy?

According to [reports](#), a U.S. Citizenship and Immigration Services (USCIS) [memorandum](#) dated November 21, 2025 implements a new policy affecting all refugees who entered the United States between January 21, 2021 and February 20, 2025. In the memorandum, USCIS:

- Instructs staff to **hold all pending adjustment of status (or green card) applications** for refugees who were admitted from January 21, 2021 to February 20, 2025;
- States that USCIS will require a **review and potential re-interview** of all refugees who were admitted from January 21, 2021 to February 20, 2025 to determine that they met the definition of a refugee and were admissible at the time when they were admitted to the U.S.
- All refugees who entered during this time period will have their cases reviewed again. The stated purpose of this review is to confirm these individuals were correctly granted refugee status at the time of their original decisions.
- Some refugees who entered during this time period may be required to attend a re-interview, even though they were already interviewed before entering the United States.
- Lawful permanent residents (green card holders) who entered as refugees during this time period will also have their cases reviewed again and may be asked to attend re-interviews.

2. Who is impacted?

All refugees and lawful permanent residents who were originally admitted as refugees from January 21, 2021 to February 20, 2025, which includes over [200,000](#) individuals. This policy does not impact asylees or lawful permanent residents based on asylee status, parolees, or individuals whose immigration status is based on any category other than refugee status. The policy also does not directly impact other immigration benefits refugees may apply for unless their refugee status is ultimately terminated, such as family reunification or

naturalization, but depending on the refugee's nationality other policies in this Explainer may impact access to those benefits.

3. When would reviews and interviews happen?

The pause of adjudications for refugee adjustment of status applications is currently in effect. The process and timeline for reviews and possible reinterviews of refugees and lawful permanent residents is unclear. The memorandum instructs USCIS to prioritize a list for reinterview and issue operational guidance within 90 days (by February 19, 2026).

4. Can USCIS terminate refugee status or the lawful permanent resident status of a person admitted as a refugee?

USCIS can [terminate refugee status](#) if it determines that the individual “was not a refugee” under U.S. law “at the time of admission.” If USCIS intends to terminate refugee status, they must give the refugee written notice and an opportunity to present evidence within thirty days to challenge the intended termination. If the government terminates refugee status, they could initiate removal proceedings before an immigration judge.

USCIS can [rescind lawful permanent resident \(LPR\) status](#) that was granted through an adjustment of status within the last five years if it determines an individual was not eligible “at the time of approval for LPR status.” If USCIS intends to rescind LPR status, they must give the LPR written notice and an opportunity to present evidence within thirty days to challenge the intended rescission. The LPR has a right to request a review before an immigration judge to challenge the rescission.

The government can also initiate removal proceedings before an immigration judge if a refugee or LPR is removable under immigration laws, such as if they were convicted of certain crimes after arriving in the U.S. or committed fraud.

5. Should refugees still apply for adjustment of status?

Yes. All refugees should file for adjustment of status after one year of physical presence in the U.S. The memorandum places a hold on decisions for adjustment of status, and it is currently unclear if interviews for pending applications will be cancelled or continue.

Asylum Seekers Applying to USCIS for Asylum

USCIS Pause of Asylum Adjudications

6. What is the new policy?

On November 28, 2025, USCIS's Director announced in a [social media post](#) that USCIS had paused all asylum decisions. On December 2, 2025, USCIS published a [policy memorandum](#) implementing an indefinite "adjudicative hold on all pending asylum applications." It is unclear if asylum interviews will continue or be rescheduled, and there are many reports of cancelled interviews. However, unless USCIS notifies an individual that their appointment is cancelled, applicants should assume the appointment will go forward.

7. Who is impacted?

The adjudicative hold covers all asylum applications, regardless of nationality. The policy should not impact asylum seekers in removal proceedings and who are applying for asylum before immigration judges, but it is not clear whether any other guidance not yet publicly available could affect applicants in court. USCIS has reportedly [estimated](#) that there are 1.4 million asylum applications pending before it.

Afghan Nationals

DOS Pause on Visa Issuance for Afghan Nationals

8. What is the new policy?

On November 28, 2025, DOS [posted on social media](#) that it had suspended visa issuance for all Afghan nationals, and [reports](#) indicate that DOS sent a cable with guidance to consular offices on November 28, 2025. The cable instructs consular officers to refuse visas to all Afghan nationals using an Afghan passport to apply for immigrant or nonimmigrant visas – the suspension does not apply to Afghan dual nationals applying with another country's passport. Unlike the June 2025 travel ban, which includes an exception for Afghan Special Immigrant Visa (SIV) applicants among others, the guidance contains no exceptions. According to the cable, interviews should *not* be cancelled, and Afghans who are not ineligible on another ground (such as the travel ban, or an inadmissibility ground) should be refused under INA 221(g), which is a [temporary refusal basis](#) that is also used when security checks are pending. The guidance does not refer to a period of time the suspension will be in effect.

9. Who is impacted?

All Afghans applying for nonimmigrant or immigrant visas at consular offices abroad are impacted. Because the June 2025 travel ban already banned the entry of most Afghans with nonimmigrant and immigrant visas, the most significant impact is on visa applicants who were exempted from the travel ban, such as Afghan SIV applicants and the spouses, parents, and minor unmarried children of U.S. citizens.

10. Does the suspension impact Afghan SIV applicants applying for COM approval?

Yes. Although the DOS cable does not refer to the first step of the Afghan SIV application process, applying for Chief of Mission (COM) approval, IRAP understands that DOS has currently suspended decisions on COM applications as well. However, it is important to note that Afghan SIV applicants can still file for COM approval and file appeals of COM denials. The deadline to apply for COM approval is December 31, 2025 (see [IRAP's Practice Advisory on the deadline](#) for more information), and the suspension of visa issuance does not impact the deadline. Afghan SIV applicants who have received denials of COM approval have 120 days from the date when they received a COM denial to file an appeal, and the suspension does not affect the appeal deadline.

Reexamination of Afghan Nationals Who Arrived Since 2021

11. What is the new policy?

On November 26, 2025, President Trump [called for a re-examination](#) of all Afghan nationals who arrived during the Biden administration. The policies discussed below relating to people from travel ban countries, which includes Afghan nationals – [pausing immigration adjudications](#) of nationals named in the travel ban, [changing factors](#) for discretionary review, and [reviewing all immigration benefits decisions](#) for individuals from travel ban countries – may be the implementation or part of the implementation of President Trump's statement. Additionally, all Afghan nationals who were admitted as refugees were already subject to the [review discussed above](#) of individuals admitted since 2021 with refugee status.

People From the 19 Countries Named in the June 2025 Travel Ban, Including Afghan Nationals

Pause on All Immigration Benefits Adjudications for People from Countries Named in the June 2025 Travel Ban

12. What is the new policy?

On November 26, 2025, USCIS's social media account posted an [announcement](#) that "processing of all immigration requests relating to Afghan nationals is stopped indefinitely pending further review of security and vetting protocols." On December 2, 2025, USCIS issued a [policy memorandum](#) that places a "hold on pending benefit requests" for individuals from the 19 countries named in the June 2025 travel ban, which includes Afghan nationals.

The memorandum does not define benefits requests, but has examples of benefit request forms that would be covered, including applications for adjustment of status (I-485); applications for travel documents, refugee travel documents, advanced parole and humanitarian parole (I-131); applications to replace a green card (I-90); petitions to remove conditions on residence (I-751); and applications to preserve residence for naturalization purposes (N-740). The hold may also include all USCIS [immigration benefits](#) applications and petitions related to family-based immigration, employment-based immigration and employment authorization, humanitarian processes like asylum and humanitarian parole, adjustment of status, and naturalization. According to the memorandum, USCIS screening functions "including credible fear, reasonable fear, safe third country, third country removal, and threshold screenings under the Asylum Cooperative Agreements" are not covered by the hold.

13. Who is impacted?

As reported, the policy impacts all people from the 19 countries named in the June 2025 travel ban who have filed for immigration benefits with USCIS, "regardless of entry date." The 19 countries named in the June 2025 travel ban are: Afghanistan, Burma, Burundi, Chad, Republic of the Congo, Cuba, Equatorial Guinea, Eritrea, Haiti, Iran, Laos, Libya, Sierra Leone, Somalia, Sudan, Togo, Turkmenistan, Venezuela and Yemen. See [IRAP's Explainer on the June 2025 Travel Ban](#) for more information on the travel ban, including litigation challenging the unlawful application of the ban in specific circumstances. The memo states that it applies to all noncitizens "who list one of the 19 high-risk countries as their Country of Birth or Country of Citizenship." In contrast, the June 2025 travel ban only applies to

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nationals of the 19 countries and exempts dual nationals applying with the passport of a country not subject to a ban.

14. How long is the pause? Will it affect interviews?

There is no specific time limit on the pause in reports on the policy. It is currently unclear if interviews for pending applications will be cancelled or continue. Unless USCIS notifies an individual that their appointment is cancelled, applicants should assume the appointment will go forward.

15. Can individuals from impacted nationalities file new applications?

Individuals from impacted nationalities should be able to file new applications with USCIS, but those applications will not be adjudicated while the pause is in effect. Importantly, the pause does not suspend or extend any deadlines related to existing immigration applications or immigration benefits, so legal practitioners and impacted individuals should still meet all required deadlines.

Review of All Immigration Benefits Applications for People from Countries Named in the June 2025 Travel Ban Who Entered the U.S. After January 20, 2021

16. What is the new policy?

On November 26, 2025, President Trump had [called for a re-examination](#) of all Afghan nationals who arrived during the Biden administration. On November 27, 2025, the Director of USCIS said in a [social media post](#) that the U.S. government plans to reexamine the lawful permanent resident (green card) status of “countries of concern” and [clarified](#) that the countries of concern were the 19 countries identified in the travel ban. On December 2, 2025, USCIS issued a [policy memorandum](#) that directs USCIS to conduct “a comprehensive re-review of approved benefit requests” for individuals from the 19 countries named in the June 2025 travel ban. According to the memorandum, the re-review will potentially include an interview or re-interview and will “fully assess all national security and public safety threats along with any other related grounds of inadmissibility or ineligibility.”

17. Who is impacted?

The re-review covers any individual from countries listed in the June 2025 travel ban who entered the United States on or after January 20, 2021 and who received an “approved benefits request.” According to the memorandum, all noncitizens “who list one of the 19 high-risk countries as their Country of Birth or Country of Citizenship” are subject to the

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re-review. According to the memorandum, the term “entered” refers to anyone who was “admitted, inspected, paroled, or entered without inspection” into the U.S. According to the memorandum, USCIS may also extend the review to individuals who entered outside of the time frame (i.e. before January 20, 2021).

As discussed [above](#) in the context of the “benefits request” hold policy, benefits requests may include all [USCIS immigration benefits](#) applications and petitions related to family-based immigration, employment-based immigration and employment authorization, humanitarian processes like asylum and humanitarian parole, adjustment of status, and naturalization.

18. When and how will the re-review be implemented?

The memorandum states that within 90 days (by March 2, 2026), USCIS should “prioritize a list for review, interview, re-interview, and referral to ICE and other law enforcement agencies as appropriate, and, in consultation with the Office of Policy and Strategy and the Fraud Detection and National Security Directorate, issue operational guidance.” If during the re-review USCIS determines someone was ineligible for a benefit, the procedures and impact would vary depending on the type benefit and the content of the finding.

For example, for lawful permanent residency, the USCIS can [rescind lawful permanent resident status](#) that was granted through an adjustment of status within the last five years if it determines an individual was not eligible “at the time of approval for LPR status.” If USCIS intends to rescind LPR status, they must give the LPR written notice and an opportunity to present evidence within thirty days to challenge the intended rescission. The LPR has a right to request a review before an immigration judge to challenge the rescission. If the government seeks to revoke the LPR status of individuals who received LPR status more than five years ago or who received visas through consular processing and were admitted as permanent residents, then the government must initiate removal proceedings before an immigration judge. The individual would keep their LPR status until the immigration judge reaches a final decision.

Regardless of the type of benefit being reviewed, if the government determines that a noncitizen is currently removable, they can potentially initiate removal proceedings before an immigration judge.

Changes to USCIS Discretionary Decisions on Immigration Benefits Applications by People from Countries Named in the June 2025 Travel Ban

19. What is the new policy?

On November 27, 2025, USCIS [issued new guidance](#) changing its approach to discretionary adjudications and according to [its Policy Manual](#), considering “country-specific facts and circumstances, such as those outlined in the [June 2025 Travel Ban], as a significant negative factor” in decisions on immigration applications for people from the 19 countries named in the June 2025 travel ban. It is not clear how the policy will be implemented in practice, but the expected effect of the policy would be to make it more likely for USCIS officers to deny immigration benefits to people from these countries.

20. What immigration benefits does the policy impact?

The policy impacts immigration benefits that involve USCIS making a discretionary decision. [USCIS’s Policy Manual lists](#) the types of benefits that it considers to involve discretion, although some benefit types involve discretion only for certain applicants or in certain situations.

Reported DHS Recommendation to Expand the Travel Ban

21. Will the Trump Administration add other countries to the Travel Ban list?

It is possible. On December 2, 2025, the Secretary of Homeland Security [reportedly recommended](#) an expansion of the travel ban to around [30-32](#) countries (an additional 11 to 13 countries). Public reporting did not include information about the countries that would potentially be included.