

GMS Flash Alert

Immigration

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United States – USCIS Halts Immigration Processing for 19 Countries and Suspends All Asylum Applications

On December 2, 2025, U.S. Citizenship and Immigration Services (USCIS) announced, via Policy Memorandum PM-602-0192, an immediate suspension and processing hold of all pending immigration benefit requests for applicants who are citizens of or were born in one of the 19 countries listed in President Trump’s June 2025 travel ban (“Presidential Proclamation 10949”).

In addition, USCIS has mandated a comprehensive re-review of previously approved benefits and suspended processing of all Form I-589 asylum and withholding of removal applications, regardless of the country of origin.¹

WHY THIS MATTERS

USCIS’s new directives will directly impact global mobility programs, employers, and mobile employees connected to the listed countries. For employers, particularly those sponsoring foreign nationals for U.S. assignments, this policy brings immediate uncertainty and potential disruption to workforce planning, onboarding, and retention. All major employment-based immigration benefits—including but not limited to green card applications, temporary tourist travel documents, and non-immigrant work visas—are subject to suspension or additional review, which may increase the administrative burden and risk of significant delays.

Employees who are citizens of or were born in one of the countries on the travel ban list face heightened scrutiny, possible re-interview, re-review, and extended processing times. This memorandum also affects individuals who have received immigration benefits and have entered the United States on or after January 20, 2021, as their cases now face retrospective re-review. In addition to the impact of the re-review, the suspension of all asylum and withholding of removal applications broadens the impact employers and individuals face and leads to delayed access to protection for vulnerable individuals from any country.

Employers and global mobility managers should anticipate increased scrutiny, requests for additional documentation, interviews, or re-interviews, and potential legal or compliance complexities.

Key Highlights

Nationwide Processing Hold for Certain Foreign Nationals

- USCIS has placed an immediate hold on all pending immigration benefit requests for individuals who are citizens of or were born in one of the 19 countries listed in Presidential Proclamation 10949 (“high-risk countries”).
- The listed countries are: Afghanistan, Burma, Burundi, Chad, Republic of Congo, Cuba, Equatorial Guinea, Eritrea, Haiti, Iran, Laos, Libya, Sierra Leone, Somalia, Sudan, Togo, Turkmenistan, Venezuela, and Yemen.²
- The hold applies if the applicant lists one of these countries as their country of birth or country of citizenship on their immigration benefit application, regardless of their current citizenship status.

Comprehensive Re-Review of Approved Benefits for Recent Entrants

- USCIS is conducting a comprehensive re-review of already approved immigration benefit requests for foreign nationals from the listed 19 countries who entered the United States on or after January 20, 2021.
- Approved benefit requests subject to re-review include, but are not limited to:
 - Form I-485 (Application to Register Permanent Residence or Adjust Status)
 - Form I-90 (Application to Replace Permanent Resident Card)
 - Form I-131 (Application for Travel Document, Parole, Arrival/Departure Record)
 - Form I-751 (Petition to Remove Conditions on Residence)
 - Form N-470 (Application to Preserve Residence for Naturalization Purposes)
- The memorandum states that the list of affected applications is not exhaustive, and employer-sponsored petitions for affected nationals may also be impacted.
- “Entered” encompasses admitted, inspected, paroled, or entry without inspection.

Suspension of All Asylum and Withholding of Removal Applications

USCIS has paused the processing of all Form I-589 applications for asylum and withholding of removal, regardless of the applicant’s country of nationality or birth.

Mandatory Case-by-Case Security Assessment

- For all three categories (pending applications, approved benefits for recent entrants, and asylum applications), USCIS will conduct an individualized, case-by-case review and assessment.
- This review includes evaluating identity, checking against the Terrorist Screening Dataset (TSDS) for known or suspected terrorists, and assessing connections to criminal or security-related grounds of inadmissibility under the Immigration and Nationality Act (INA) sections 212(a)(3)(A), (B), (F), and 237(a)(4)(A), (B).

- All individuals covered under this memorandum are subject to a mandatory interview. For cases where interviews are not typically required, a review will determine if an appearance at USCIS is necessary. Interviews cannot be waived under any circumstances.

Next Steps

- Within 90 days, USCIS will prioritize cases for review, interviews, and potential referral to Immigration and Customs Enforcement (ICE) and other law enforcement agencies.

Broader Impact and Potential Expansion

- The memorandum's application is broader than the travel ban itself, as it affects applicants listing a travel ban country as their birth or citizenship country, not just current nationals.
- The memorandum allows for possible extension of the re-review process to individuals who entered before January 20, 2021, at USCIS's discretion.
- The current Administration is reportedly considering expanding the travel ban to additional countries, which could subject more foreign nationals to these measures, though further details are not specified in the memorandum.

Documentation and Legal Impact

- All findings resulting from reviews will be documented according to established protocols.
- The memorandum does not confer enforceable rights or procedural benefits in removal proceedings or litigation.
- Any request to lift the processing hold on a specific application due to litigation or extraordinary circumstances must be approved by the USCIS Director or Deputy Director.

KPMG LAW LLP INSIGHTS

In the light of the new policy, organizations and individuals affected should be mindful of the following:

- Organizations may wish to review their current and planned assignments involving nationals from high-risk countries and communicate proactively with impacted employees about potential changes in processing timelines.
- Organizations may wish to proactively engage counsel in order to develop a strategy for preparing to responding to requests for additional evidence and interviews.
- Employers and mobility professionals should anticipate increased documentation demands and possible delays for affected cases, particularly those involving nationals of designated countries.

If anyone has any questions or concerns about the scope of the update, its application, potential impacts, and appropriate next steps, they should consult with a member of the US immigration team at KPMG Law LLP in Canada (see the Contacts section).

FOOTNOTES

1 Policy Memorandum “[Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High-Risk Countries](#)”, USCIS website, published on December 2, 2025.

2 Proclamation 10949 of June 4, 2025, “[Restricting the Entry of Foreign Nationals To Protect the United States From Foreign Terrorists and Other National Security and Public Safety Threats](#),” Federal Register, Vol. 90, No. 110 (June 10, 2025) .

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Contact Us

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