

March 30, 2026

Markwayne Mullin
Secretary
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave., SE
Washington, DC 20528

Todd M. Lyons
Acting Director
U.S. Immigration and Customs Enforcement
500 12th Street, SW
Washington, DC 20536

Marco Rubio
Secretary of State
U.S. Department of State
2201 C Street, NW
Washington, DC 20520

Joseph Edlow
Director
U.S. Citizenship and Immigration Services
5900 Capital Gateway Drive
Camp Springs, MD 20588

Re: Urgent Need to Restore Immigration Benefit Adjudications and Humanitarian Stability for Iranian Nationals in the United States

Dear Secretary Mullin, Secretary Rubio, Acting Director Lyons, and Director Edlow:

The undersigned Iranian American organizations, a nationwide coalition of legal, civic, and community institutions serving Iranian American communities throughout the United States, respectfully urge the Administration to resume adjudicating immigration benefits that it has previously paused in recent months.¹ Specifically, we urge the Administration to resume immediately adjudications of Employment Authorization Document (EAD) applications and petitions for work-authorized classifications for Iranian nationals who are lawfully present and seeking only to maintain their legal status, ability to work, support their families, and remain compliant with U.S. immigration requirements.

Our organizations share a commitment to informing the public and policymakers on issues affecting Iranian Americans and supporting the wellbeing and rights of our communities. Recently, across the U.S., Iranian students and professionals, and their families, have been experiencing significant disruption as routine immigration processes remain frozen as a result of

¹ U.S. Citizenship & Immigration Services, *Hold and Review of All Pending Asylum Applications and All USCIS Benefit Applications Filed by Aliens from High-Risk Countries*, PM-602-0192 (Dec. 2, 2025), <https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0192-PendingApplicationsHighRiskCountries-20251202.pdf>; see also U.S. Citizenship & Immigration Services, *Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High-Risk Countries*, PM-602-0194 (Jan. 1, 2026), <https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0194-PendingApplicationsAdditionalHighRiskCountries-20260101.pdf>.

USCIS Policy Memoranda² that have in part placed a hold on the adjudication of any and all immigration benefit requests for any person born in or holding citizenship from Iran. Individuals who have complied with all legal requirements and have already been vetted, admitted, and granted prior immigration benefits, now face prolonged uncertainty regarding their ability to continue employment, maintain lawful status, or complete long-pending immigration processes.

The effects of the USCIS policy are wide-reaching and not limited to would-be immigrants overseas. For example, one organization estimated that “workers born in 69 of the 75 countries affected by the pause account for about 7.8 million foreign-born workers already in the U.S., including about 1.2 million health care workers (nearly 8% of U.S. healthcare workers under age 65).”³ Another estimated that around 12,000 Iranian F-1 students specifically live in the U.S.⁴ These students would also be affected by the pause; when they complete their degree programs, they most likely will seek employment authorization, which often serves as the critical bridge between education and meaningful contribution to U.S. research, innovation, and economic growth. Delays in adjudicating their EAD applications after completing their higher education programs here in the U.S. will inevitably lead to losing offers, interrupting critical U.S. research and training opportunities, and increasing risk of falling out of status. Green card applicants and asylum seekers frequently rely on timely EAD adjudications and renewals to meet basic needs while their cases move through already strained adjudication systems.

Non-immigrant work-authorized visa holders (H, L, TN, E, O, P, etc.) who have long contributed to the U.S. economy and household stability are suddenly facing income loss that threatens housing security, access to healthcare, and childcare arrangements because their extensions of status have been put on an indefinite pause. Even lawful permanent residents pursuing naturalization are encountering downstream delays that prolong uncertainty about their legal integration and civic participation.

The consequences of pausing the adjudication of all immigration benefits therefore extend well beyond administrative inconvenience. When employment authorization cannot be obtained or renewed, individuals risk losing jobs they are otherwise fully eligible to perform, including positions through which they contribute to critical research, innovation, and essential sectors of the U.S. economy. U.S. employers specifically lose trained and vetted workers, often with specialized skills already integrated into ongoing projects and teams. For example, according to data from the Institute of International Education, over 75 percent of Iranian students in the U.S.

² Id.

³ Drishti Pillai & Samantha Artiga, *Potential Impact of the Federal Pause on Immigrant Visas From 75 Countries on the U.S. Health Care Workforce*, KFF (Jan. 29, 2026), <https://www.kff.org/immigrant-health/potential-impact-of-the-federal-pause-on-immigrant-visas-from-75-countries-on-the-u-s-health-care-workforce>.

⁴ Brooke Hauser, *For Iranian Students Studying in the U.S., Every Headline Brings a Slew of Emotions: “All I Think About Is Freedom,”* Boston Globe (Mar. 7, 2026), <https://www.bostonglobe.com/2026/03/07/metro/iranian-students-massachusetts-middle-east-war>.

pursue STEM fields.⁵ This concentration of talent means that Iranian students are precisely the kind of future innovators, researchers, and employees that U.S. universities and private-sector employers depend on to close the STEM talent gap. Many have gone on to contribute to advancements in artificial intelligence, biotechnology, renewable energy, and other critical sectors. But because of this Administration's recent immigration policy changes, universities and research institutions face disruption, including collaborative work that advances discovery and workforce development. Families are forced to make difficult financial decisions while attempting to remain compliant with complex immigration rules and their ability to contribute to local economic and community stability is diminished.⁶ In some cases, individuals may face the prospect of falling out of lawful status through no fault of their own.

These harms must also be understood in light of the rapidly deteriorating conditions Iranian nationals would face if compelled to depart the U.S. and return to Iran. The Trump administration's decision to initiate military action against Iran has significantly escalated an already fragile situation marked by internal repression, widespread unrest, and economic hardship. Armed conflict and related security disruptions have increased risks to civilian populations, contributed to displacement and instability, and strained access to essential services and economic opportunity.⁷ At the same time, longstanding concerns regarding arbitrary detention, violence, and severe restrictions on civil liberties persist. The Department of State continues to maintain its highest travel advisory level for Iran (Level 4: Do Not Travel)⁸, underscoring the seriousness of these conditions.

In this context, returning to Iran is not simply a matter of logistical difficulty or personal inconvenience. For many Iranian nationals in the U.S., departure may mean reentering an environment shaped by conflict-related insecurity, political repression, and diminished prospects for safety and livelihood.⁹ Policies that indefinitely delay access to continued legal status, employment authorization, or routine immigration benefits therefore risk creating indirect pressure on otherwise law-abiding individuals to abandon lawful presence or consider return under circumstances that pose significant risks to their personal safety and long-term stability.

Where immigration processing delays intersect with deteriorating country conditions like Iran is experiencing, targeted humanitarian measures can help prevent destabilizing outcomes for individuals, families, employers, and communities. The immigration system already provides

⁵ Institute of International Education, *Open Doors 2012: Report on International Educational Exchange* 15 (2012), <https://www.iie.org/Research-and-Publications/Publications-and-Reports/Open-Doors-2012>.

⁶ Pillai & Artiga, *supra* note 5.

⁷ Amy Taxin et al., *Iranian Americans Fear for Relatives in Their Homeland as War Continues*, Associated Press (Mar. 3, 2026), <https://apnews.com/article/iranian-american-diaspora-us-7c8caccf669c34097caf1c74de0a40db>.

⁸ U.S. Dep't of State, *Iran Travel Advisory*, <https://travel.state.gov/en/international-travel/travel-advisories/iran.html> (last visited Mar. 18, 2026).

⁹ Etan Maboutakh, *As U.S. Bombs Iran, ICE Is Deporting Iranian Americans Into Danger*, Truthout (Mar. 17, 2026), <https://truthout.org/articles/as-us-bombs-iran-ice-is-deporting-iranian-americans-into-danger>.

mechanisms designed for precisely these circumstances. Accordingly, the Administration should also consider the use of deferred action and humanitarian parole where appropriate. In addition to designating Iran for Temporary Protected Status (TPS)¹⁰ to help ensure safety, continuity of lawful presence, and employment authorization while conditions in Iran remain volatile.

Immigration policy must be administered in a manner that is both fair and grounded in individualized assessment. Broad indefinite adjudication pauses affecting Iranian nationals who are already lawfully present in the U.S. and have previously undergone multiple layers of screening risk imposing sweeping collateral consequences without a clear connection to case-specific security concerns. These policies disrupt people's lives, the economy, employment, destabilize families, and undermine confidence in the predictability of lawful immigration processes. Promptly resuming adjudications, particularly for EADs and work-authorized classifications, would restore needed stability while allowing the government to rely on the individualized review mechanisms already embedded throughout the immigration system.

Iranian nationals affected by the adjudication pause are deeply integrated into communities across the U.S. They contribute to the nation's scientific research enterprise, healthcare systems, entrepreneurial ecosystem, and academic institutions. Many have built families and long-term professional relationships here. Ensuring continuity of lawful status and employment during periods of global instability is consistent with longstanding humanitarian principles as well as sound economic and administrative policy.

Accordingly, the undersigned organizations respectfully urge the Administration to take the following steps:


- Resume adjudication of pending and newly filed EAD applications for Iranian nationals who are lawfully present in the U.S.
- Restore routine processing of extensions of stay, changes of status, adjustment-related ancillary benefits, and naturalization steps that have been delayed or paused.
- Provide clear public guidance regarding the scope and anticipated duration of any remaining review measures.
- Implement safeguards to prevent loss of lawful status or employment authorization resulting solely from government-imposed adjudication delays.
- Evaluate and consider targeted humanitarian protections, including designation of Temporary Protected Status (TPS) for Iranian nationals and use of deferred action and humanitarian parole while conditions in Iran remain volatile.

¹⁰ 8 U.S.C. § 1254a(b)(1)(A), (C).

These measures would provide meaningful relief to individuals seeking to remain compliant with the law while sustaining themselves during a period of uncertainty abroad. They would also reinforce the predictability of lawful immigration pathways.

The undersigned organizations welcome the opportunity to engage constructively with the Department of Homeland Security, United States Citizenship and Immigration Services, Immigration and Customs Enforcement, and the Department of State to share practitioner perspectives and information about community impacts. We appreciate your attention to these concerns and urge timely action.

Respectfully,



Payam Saljoughian

President

Iranian American Bar Association (IABA)



Neda Bolourchi

Executive Director

Public Affairs Alliance of Iranian Americans (PAAIA)



Paris Etemadi Scott

Legal Director

Pars Equality Center



Ali Rahnama

Interim Executive Director

Iranian American Legal Defense Fund (IALDF)