



THE HIDDEN COST OF IMMIGRATION DELAYS

*Economic and Human Cost of the
USCIS Adjudication Pause*

JULY 2026

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Executive Summary

This research report focuses on investigating the economic and social impact of the U.S. Citizenship and Immigration Services (USCIS) [PM-602-0192](#) and [PM-602-0194](#) policy memoranda that put a hold on all pending asylum applications and USCIS benefit applications filed by aliens from 39 High-Risk Countries. This report documents the individual, household, and systemic consequences of the pause in adjudication of immigration benefits to 189 immigrants from different backgrounds across 31 states and 25 countries of origin, offering a broad and diverse perspective on the scope of the issue.

Key Findings

- Widespread disruption to employment, financial stability, and long-term economic participation. A substantial proportion of respondents are currently unable to work due to the lack of valid employment authorization, resulting in significant income loss and financial strain. Many of those affected are highly educated professionals who were previously employed in critical sectors such as technology, healthcare, and research. Despite their qualifications and prior economic contributions, they now face challenges meeting basic living expenses, accumulating debt, and navigating prolonged uncertainty.
- The economic consequences are considerable. A large share of respondents report losing tens of thousands of dollars in income, with some experiencing losses exceeding \$100,000. These financial disruptions have led to increased vulnerability, including rising debt burdens and reduced financial security.
- The adjudication pause has resulted in substantial harm to individuals' overall wellbeing. A majority of respondents report elevated levels of stress and declining overall wellbeing, underscoring the significant human impact of prolonged uncertainty. At the same time, a notable proportion are actively considering leaving the United States, signaling a potential long-term loss of highly skilled talent and a weakening of the country's economic competitiveness.

Executive Summary

Recommendations for Future Policies

- Compliance with multiple court orders: USCIS should issue internal memoranda informing every field office, service centers and contact center that the hold has been lifted. This step would help ensure that adjudications resume promptly and prevent individuals from the 39 affected countries from becoming entangled in prolonged bureaucratic processes and unnecessary government delays.
- Prioritize the adjudication of employment authorization applications, including OPT, STEM OPT, family-based and employment-based adjustment of status, and other categories of work authorization. Survey findings indicate that the loss or delay of work authorization is the strongest predictor of financial hardship among affected individuals. USCIS can continue to conduct thorough vetting and security reviews while ensuring that eligible applicants are not subjected to unnecessary economic harm resulting from prolonged delays in employment authorization processing.
- Congress should enact permanent statutory protections to ensure that legal immigrants are not subjected to broad administrative freezes or prolonged adjudication delays in the future. Immigration laws should include clear vetting processes that prevent a single government agency from indefinitely pausing the processing of immigration benefits without appropriate oversight and accountability. If national security concerns require enhanced screening, immigration law should provide structured mechanisms that allow for thorough vetting while preserving timely adjudication of applications. Security reviews and benefit processing are not mutually exclusive and can be conducted in a timely manner.

Background and Policy Context

Background & Policy Context

Immigrants have contributed disproportionately to nearly every domain of American life, from the founding of major corporations and the winning of Nobel Prizes, to filling critical gaps in healthcare and serving in the military. Immigrants have served in every American war. During World War II, Japanese-American internees who were U.S. citizens or permanent residents volunteered to serve and formed the 442nd Infantry Regiment — the most decorated unit in U.S. military history.

During the Vietnam War, over 30,000 Filipino-Americans served across all U.S. Armed Forces divisions. In the War on Terror, immigrants who enlisted under the Military Accessions Vital to the National Interest (MAVNI) program brought critical language and medical skills. Many have died in service and been posthumously naturalized. Immigrants are also a vital component of the U.S. healthcare system, helping address workforce shortages that cannot be met by the native-born labor supply alone.

However, recent changes to immigration policies, visa processing, and workforce entry pathways have raised concerns about the ability of different areas of the US workforce to attract and retain the international talent needed to meet growing economic demands.

In late 2025, U.S. Citizenship and Immigration Services (USCIS) issued a series of internal policy memoranda, effectively halting processing for broad categories of applicants. The measures included: suspension of all asylum adjudications, freezing of immigration benefits for nationals of designated “high-risk” countries, retroactive re-review of previously approved benefits; and directives for officers to consider country of origin as a factor in discretionary decisions. The policy directives were issued in accordance with [Executive Order 14161](#), Protecting the United States from Foreign Terrorist and Other National Security and Public Safety Threats, and [Presidential Proclamations 10949 and 10998](#), restricted entry for nationals from 39 countries lacking adequate vetting and screening information. USCIS framed these measures as necessary to uphold the integrity of the immigration system, national security, and public safety, emphasizing enhanced vetting for applicants from identified high-risk countries.

Key Memoranda



PM-602-0192

PM-602-0192 — Hold and Review of All Pending Asylum Applications and USCIS Benefit Applications Filed by Aliens from High-Risk Countries: This memo initiated the first wave of freezes, placing holds on asylum adjudications and all immigration benefit applications filed by nationals of an initial list of 19 countries designated as “high-risk.”



PM-602-0193

PM-602-0193 — Hold and Review of Pending USCIS Adjustment of Status Applications Filed by Aliens Under the Diversity Immigrant Visa Program: This memo extended the hold to cover Diversity Visa adjustment of status applications, a separate pathway through which tens of thousands of immigrants annually seek lawful permanent residence.



PM-602-0194

PM-602-0194 — Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High-Risk Countries: This memo expanded the affected list by 20 additional countries, bringing the total to 39, and introduced a retroactive re-review provision for previously approved benefits.

39 COUNTRIES ACROSS AFRICA, THE MIDDLE EAST, ASIA, THE CARIBBEAN & THE PACIFIC

January 2026 Expansion: 20 New Countries Added

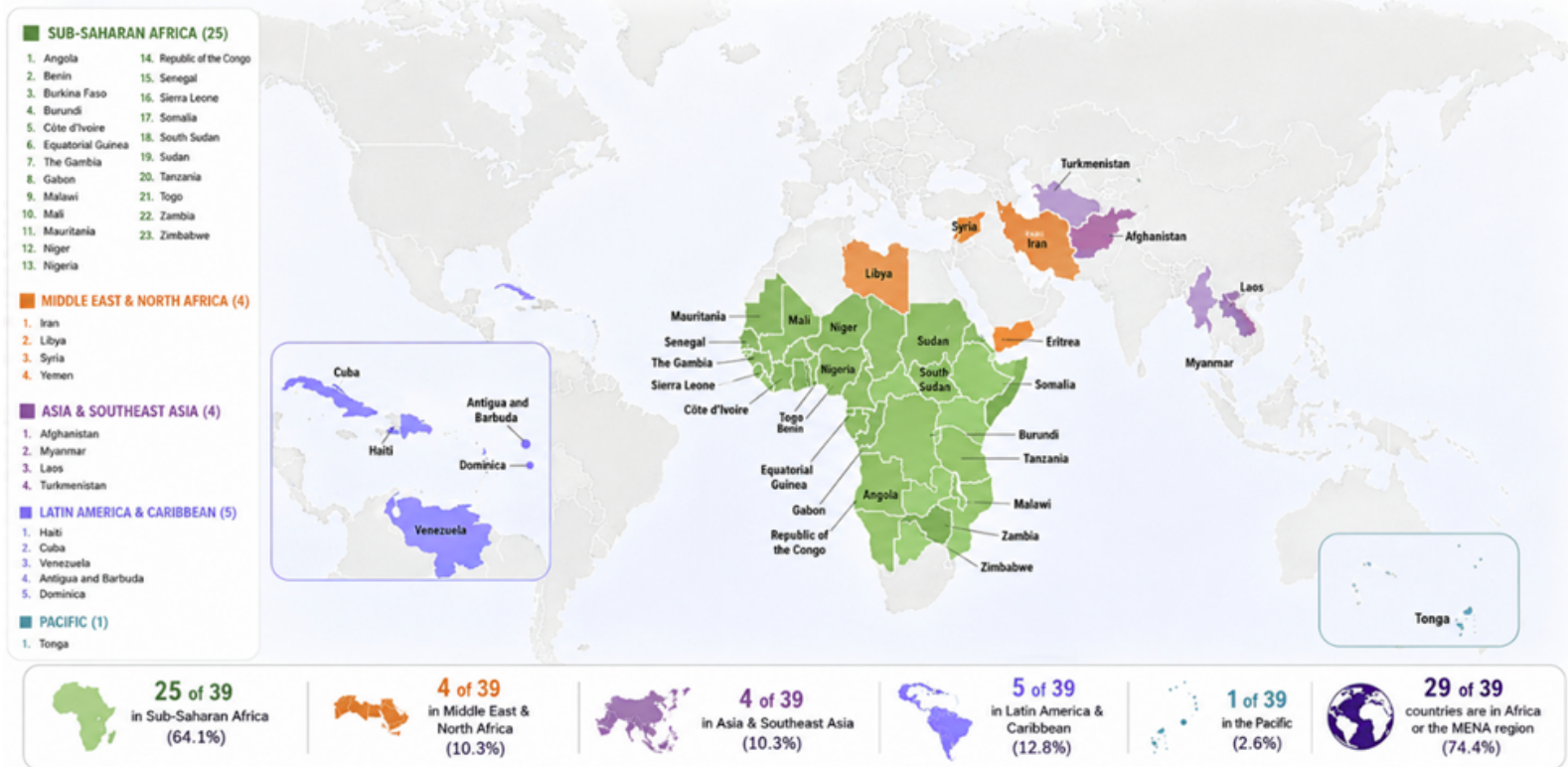


Figure 1: 39 countries included in the high-risk list.

Designated Countries

The initial December 2025 memo designated 19 countries: Afghanistan, Chad, Republic of the Congo, Equatorial Guinea, Eritrea, Haiti, Iran, Libya, Myanmar (Burma), Somalia, Sudan, Yemen, Burundi, Cuba, Laos, Sierra Leone, Togo, Turkmenistan, and Venezuela. The January 2026 expansion added 20 more: Angola, Antigua and Barbuda, Benin, Burkina Faso, Côte d'Ivoire, Dominica, Gabon, The Gambia, Malawi, Mali, Mauritania, Niger, Nigeria, Senegal, South Sudan, Syria, Tanzania, Tonga, Zambia, and Zimbabwe. Across all 39 countries, the geographic concentration is heavily African. 25 of the 39 countries are in Sub-Saharan Africa, representing 64.1% of the listed nations. Four are in the Middle East and North Africa (Iran, Libya, Syria, Yemen).

Four are in Asia and Southeast Asia (Afghanistan, Laos, Myanmar, Turkmenistan). Five are in Latin America and the Caribbean (Haiti, Cuba, Venezuela, Antigua and Barbuda, Dominica). One is in the Pacific (Tonga). In total, 29 of the 39 countries, nearly three-quarters, are on the African continent or in the MENA region.

Rollout and Justification

The rollout of these policies occurred in rapid succession: a Policy Manual revision on November 27, 2025 (PA-2025-26), the first hold memo on December 2, 2025 (PM-602-0192), and an expansion on January 1, 2026 (PM-602-0194). Although the December memo indicated operational guidance would be provided within 90 days, no guidance had been issued as of March 3, 2026 or April 2nd. USCIS justified these actions by citing Executive Order 14161 and Presidential Proclamations 10949 and 10998, which emphasize enhanced vetting of foreign nationals, particularly from countries identified as presenting national security or public safety risks.

According to USCIS, these policies are intended to address concerns related to visa overstays, fraud, and gaps in identity verification and screening processes, while reinforcing the integrity of the immigration system. In practice, however, these measures have resulted in an indefinite pause affecting individuals who are lawfully present in the United States and actively engaged in the immigration system which in many cases, requiring applicants to pursue consular processing is not a viable option because departing the United States would result in the abandonment of their pending adjustment of status application. Additionally, choosing consular processing would require them to restart the immigration process from the beginning, causing significant delays, additional costs, and unnecessary hardship.

Scope of Affected Applications

The policy framework broadly affects a wide range of immigration benefit applications, including asylum requests, adjustment of status to lawful permanent residence, naturalization, and other benefits such as: petitions to remove conditions on conditional green cards, refugee or asylee travel documents, replacement green cards, and the rarely used Form N-470 (Application to Preserve Residence for Naturalization). Non-immigrant petitions are similarly impacted. O and P visa applications, regardless of whether they meet all substantive requirements, such as extraordinary achievement or consultation letters, cannot be approved until vetting is complete and the hold is lifted. Premium processing, which requires applicants to pay approximately \$2000 to \$3000 is effectively suspended, as cases cannot be adjudicated within the standard 15-day timeframe.

The hold also extends to H-1B and L-1 petitions for nationals of affected countries, including derivative or dependent applications (e.g., H-4 spouses), changes of status to F-1 and other visa categories, employment authorization documents for F-1 students on OPT or STEM-OPT, and humanitarian applications. In practice, this creates a comprehensive pause across most immigration and non-immigration benefit types for individuals from the designated countries. Applicants who have completed multiple stages of the process, including biometrics, interviews, and documentation, remain unable to receive final decisions, as the hold specifically targets the adjudication stage across numerous benefit categories.

“For applicants within the United States, the pause disrupts the standard progression of cases, effectively halting outcomes even after substantial procedural steps have been completed.”

Retroactive Review Provision

A particularly consequential aspect of the January 2026 memorandum (PM-602-0194) is its retroactive review provision. Under this directive, USCIS officers are instructed to re-examine previously approved applications from affected countries dating back to January 20, 2021. This creates significant uncertainty, as individuals who have already secured immigration benefits may now face re-interviews, additional scrutiny, or even potential revocation of status. This backward-looking approach extends the impact of the policy beyond pending cases to individuals who had reasonably considered their immigration processes complete. In PM-602-0194, USCIS identified limited exceptions—such as certain replacement documentation (Forms I-90, N-565, N-600), initial asylum-based work authorization applications, cases involving law enforcement or national security priorities, and applications deemed to serve the national interest. However, formal guidance on how these exceptions are defined or applied remains limited. While some practitioners report that national interest considerations may be evaluated on a case-by-case basis, there is no clear or standardized process available to applicants.

On March 30, 2026, USCIS announced the establishment of an internal process for lifting holds on certain individual and group cases following multi-level review. The agency indicated that holds had been lifted in limited categories, including cases vetted through Operation PARRIS, certain family-based petitions (e.g. i130 Petition for Alien Relative), intercountry adoption applications, rescheduled oath ceremonies, select employment authorization documents, and asylum applications from non-designated countries. However, the announcement lacked clarity regarding the scope, criteria, and consistency of these exceptions, leaving significant uncertainty about which applicants may benefit from these changes.

Despite the scale and impact of these measures, several critical elements remain unclear. No timeline has been provided for how long the adjudicative hold will remain in place. No quantified figures have been released for how many cases are currently pending, how many are affected by each individual memo, or what the total backlog created by the pause now represents. No formal procedural guidance has been issued for how applicants may apply for the national interest exception or other discretionary relief. This lack of clarity has contributed to widespread uncertainty among affected individuals and stakeholders, further compounding the practical and human consequences of the policy.

Ongoing Legal Challenges

Multiple lawsuits have been filed from individuals represented by different private law firms challenging the [PM-602-0192](#) and [PM-602-0193](#) memoranda. Press Unpause, an independent, immigrant-led initiative, has been tracking federal litigation and reports that more than 50 lawsuits are currently active challenging the pause, with plaintiffs arguing that the policy exceeds the government's legal authority. (see [Press Unpause lawsuit tracker](#) for more information).

More recently, on June 5th, On June 5, 2026, Chief Judge John J. McConnell Jr. of the U.S. District Court for the District of Rhode Island issued a sweeping ruling in favor of the plaintiffs. The court held that the challenged USCIS policies violated the Administrative Procedure Act because they were “contrary to law” and “arbitrary and capricious.” The judge concluded that the agency lacked authority to impose broad, nationality-based or category-wide processing freezes that stalled lawful immigration adjudications. As a remedy, the court vacated (set aside) the policies nationwide, meaning they are no longer enforceable, not just for the plaintiffs but for all affected applicants.

The Policies Vacated are:

1

Global asylum hold policy

Indefinitely paused adjudication of asylum application nationwide, regardless of origin.

2

Benefits hold policy

Halted all adjudications of requests for immigration benefits submitted by nationals of the 39 countries.

3

Comprehensive re-review policy

Required re-review of previously approved benefit requests for individuals from designated countries.

4

Country specific factors policy

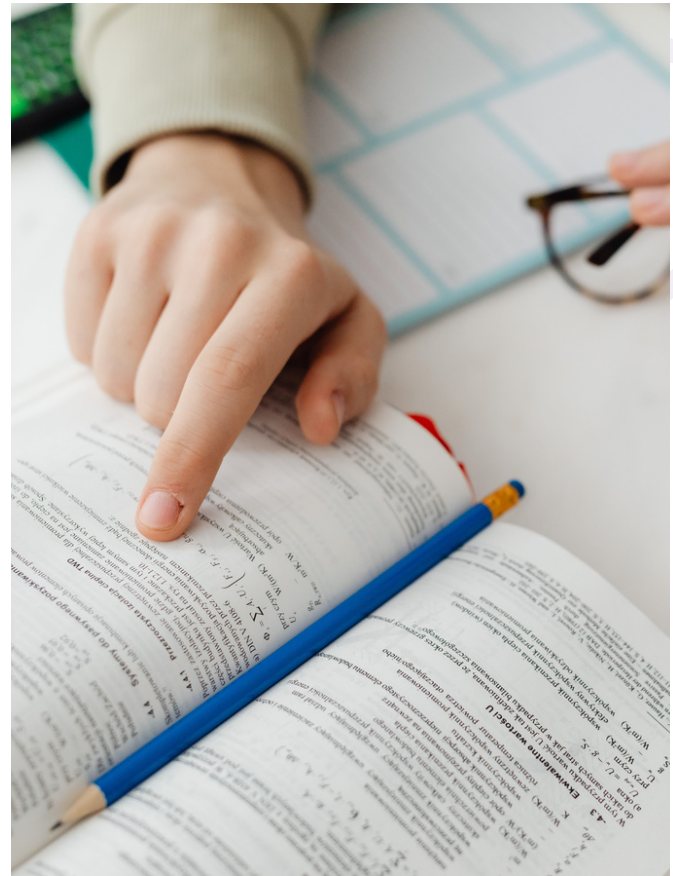
Directed officers to treat nationality from designated countries as a significant negative factor.

Purpose and Methods of the Report

Purpose and Methods

This report documents the individual, household, and systemic consequences of the pause in adjudication of immigration benefits by U.S. Citizenship and Immigration Services (USCIS). The pause, which halted or significantly delayed the processing of Employment Authorization Documents (EADs), Adjustment of Status applications (Form I-485), Advance Parole travel documents (Form I-131), and related petitions, has generated immediate and cascading effects across the lives of hundreds of thousands of immigrants legally residing in the United States. This study provides primary empirical evidence of those effects, drawn directly from 189 affected individuals across 31 states and 25 countries of origin.

The adjudication pause is not, in the first instance, a legal abstraction. It is a policy event with human consequences: individuals rendered unable to work not because they lost their jobs, but because the federal government ceased to process the documents that authorize their employment. It is families separated by travel restrictions that arose not from enforcement action but from administrative inaction. It is households that entered 2025 in stable financial footing and now report depleted savings, accumulating debt, and an inability to meet basic needs. It is professionals including; physicians, engineers, researchers, software developers, whose expertise remains intact but whose legal right to deploy it has been interrupted. This report captures those consequences in quantitative and qualitative detail.



“
This report is concerned exclusively with a specific, bounded policy event: the USCIS adjudication pause, its proximate effects on the individuals and households it has directly affected, and the broader systemic costs it has generated for U.S. employers, communities, and the country's competitive position in global talent markets.
”

The study serves three interlocking purposes. First, it produces a rigorous, person-centered evidence base about who is affected by the pause and how filling a critical gap in policy discourse where aggregate estimates have dominated and individual experience has been largely absent. Second, it identifies the differential and compounding vulnerability of specific subgroups within the affected population, including OPT and STEM-OPT participants, women with dependents, asylum seekers, and families with dependent children for whom the pause does not merely delay outcomes but actively destabilises circumstances that were previously stable. Third, it supports the case for targeted and expedited policy intervention by demonstrating, across multiple domains and through multiple analytical methods, that the costs of continued inaction are not merely administrative but human, economic, fiscal, and strategic.

It is important to be precise about what this report does and does not address. This is not a report about the aggregate economic contribution of immigrants to the United States, nor is it a study of the long-term fiscal impact of immigration as a policy category. Those questions which are the subject of a planned second round of survey research scheduled for later in 2026 are set aside here. This report is concerned exclusively with a specific, bounded policy event: the USCIS adjudication pause, its proximate effects on the individuals and households it has directly affected, and the broader systemic costs it has generated for U.S. employers, communities, and the country's competitive position in global talent markets.

Why this Study was Conducted

In late 2025, the U.S. government paused the adjudication of certain immigration applications for individuals lawfully living and working in the United States, affecting an estimated two million pending applications⁴. This was not a change to immigration law. It was an administrative decision implemented through internal policy memoranda to stop adjudicating the documents that allow immigrants to work, travel, and remain in lawful status while their cases are pending. For the people affected, the consequences were immediate.

This report exists because those consequences have not been systematically documented. Public debate about the pause has largely proceeded without primary data about who is affected and what is happening to them. Policymakers, legislators, and the public have been asked to form views about an administrative action whose human costs remain largely invisible. This study is a deliberate effort to make those costs visible drawn directly from the people experiencing them.

The Study Answers **3 Questions:**

Who are the people affected by the pause: their qualifications, their professions, their length of time in the United States, and the legal categories in which their applications sit?

1

What has the pause done to their lives across the domains of work, finances, housing, health, family, and legal standing?

2

What are the broader consequences for the United States, for its workforce, its tax base, its communities, and its standing as a destination for global talent?

3

Overview of Research Design and Methodological Approach

This study employs a convergent mixed-methods design, integrating structured quantitative survey data with an embedded qualitative dimension. The decision to adopt a mixed-methods framework reflects the dual nature of the research questions: quantitative instruments are well-suited to measuring the scale and distribution of harm including; income loss, financial distress, housing instability, health deterioration - while qualitative data are essential to capturing the texture and meaning of that harm as experienced by affected individuals. Neither strand is subordinate to the other; both are treated as analytically essential.

The research design was informed by established frameworks in social policy research and applied immigration scholarship, drawing in particular on the methodological guidance set out by Creswell and Plano Clark (2018)⁵ for convergent mixed-methods inquiry, and on community-embedded survey traditions developed at the Migration Policy Institute and the National Academies of Sciences. The convergent design allowed for the simultaneous collection of quantitative and qualitative data, their independent analysis, and their integration at the interpretation stage. Where appropriate, regression analysis was used to identify predictors of key outcomes financial hardship, housing instability, health deterioration, and departure consideration, and to estimate the magnitude of those effects, controlling for relevant demographic and situational covariates. These results are reported in Sections 3 and 4 of the full report; this section documents the methodological foundation on which those analyses rest.

Survey Design

The primary data collection instrument was a structured survey comprising 126 variables across eight thematic modules. The modules were designed to capture, in sequence: respondent demographic characteristics; educational attainment and the location of degree acquisition; immigration status and application history; employment status and sector; income and tax contribution history; the specific impacts of the adjudication pause across six life domains (employment, education, family, legal standing, health, and housing); financial coping mechanisms and support sources; and future intentions regarding continued residence in the United States.

The survey was designed to capture both categorical and ordinal response data, enabling quantitative analysis of distributions and cross-tabulations. Multi-select items were used where respondents might have experienced more than one consequence within a given domain — for example, financial impacts, where respondents could identify all applicable hardships simultaneously. This design allowed the study to quantify not only the incidence of harm in each domain but the cumulative burden of simultaneous hardships within and across domains.

Open-ended qualitative fields were embedded throughout the survey, inviting respondents to describe their circumstances in their own words. These fields provide the narrative evidence that forms the qualitative dimension of the analysis and that gives empirical texture to findings that would otherwise remain as statistical distributions. Survey items were reviewed by a small advisory group of immigration law practitioners and immigrant community advocates prior to deployment, with refinements made to item wording and the clarity of immigration terminology.

Survey Administration

The survey was administered digitally via a secure online platform and distributed through networks of immigrant advocacy organisations, professional associations, and community groups across the United States. No financial incentive was offered for participation. The survey was made available in English; all 149 final respondents completed it in full.

Data collection yielded 189 raw submissions. Following data validation and cleaning, including removal of substantially incomplete responses and standardisation of coding for multi-select items. The final analytical sample comprised 149 valid respondents. This sample spans 31 U.S. states and 25 countries of birth.



Module	Thematic Focus	No. of Variables
1	Demographic characteristics (age, gender, marital status, dependents, country of birth)	12
2	Educational attainment and funding of U.S.-based education	9
3	Immigration status, application history, and applications affected by the pause	15
4	Employment status, sector, U.S. work experience, and income band	11
5	Tax contributions	6
6	Impact of the adjudication pause across six domains: employment, education, family, legal standing, health, and housing	42
7	Financial coping mechanisms, debt instruments used, support sources, and ability to meet basic needs	19
8	Future intentions: departure consideration, destination country, legal representation, exemption filing	12

Table 1: Survey modules, key variables, and variable counts across the 126-item instrument.

Overview of Respondent Characteristics

The survey captures a diverse and broad representative cross-section of affected individuals. The five states accounting for the largest share of respondents are Florida (23), Texas (22), New York (13), California (13), and Georgia (6). These states are major immigration hubs with large immigrant populations, suggesting strong alignment between where the policy pause is most acutely felt and where responses were concentrated.

Respondents are predominantly prime working-age adults with high levels of educational attainment, reflecting the skilled immigrant population most impacted by the pause. Among 147 respondents, the 25–34 age group accounts for 50.3%, followed by those aged 35–44 at 28.9%. In total, 79.2% fall between the ages of 25 and 44, individuals in the core of their career-building and most economically productive years.

Characteristic	Detail
Sample (n)	189
U.S. states represented	31
Countries of birth	25
Age range	18–74
Majority age cohort	25–34 (50.3%, n=75)
Gender composition	Male 64.4% (n=96), Female 33.6% (n=50), Not disclosed 2.0% (n=3)
Education (graduate degree+)	61.7% hold Master's, Doctorate, or professional degree
Largest country of origin	Nigeria (30.2%, n=45)
Largest immigration category	Pending adjustment of status — Form I-485 (42.1%, n=61)
Median length of U.S. residence	3–10 years (61.6% of sample)
Respondents with dependents	44.3% (n=66)

Table 2: Summary characteristics of the analytical sample

Importantly, these are not first-time students but established, mid-career professionals. Among 149 respondents, 83% hold at least a bachelor's degree. The distribution is particularly notable: master's degree holders constitute the largest group at 36.2%, followed by bachelor's degrees (22.1%), doctorates (15.4%), and professional degrees such as MDs and JDs (9.4%). Overall, more than 60% of respondents possess a graduate-level qualification.

This reflects a highly skilled pool of human capital, indicating that the adjudication pause is not an abstract policy issue but a direct constraint on one of the most educated segments of the immigrant workforce. Only 10.1% of respondents have a high school diploma or less, further highlighting that the policy disproportionately affects highly credentialed individuals at critical stages of their professional lives.

Family structure data further highlights the broader social implications. Of 147 respondents, 70.1% are married and 44.3% have dependents. Among those with dependents, 33 support one child, 15 support two, and 13 support three or more. This indicates that the pause is not affecting individuals in isolation but is instead destabilizing family units, including children—many of whom are likely U.S. citizens or legal residents. The survey also reflects significant geographic and national diversity.

Respondents originate from 25 of the 39 countries affected by the pause. At the same time, they are largely long-term U.S. residents: among 143 respondents, 59.5% have lived in the United States for three to ten years, 12.1% for 11 to 15 years, and 8.1% for 21 years or more. These figures demonstrate that most respondents are not recent arrivals but individuals who have built their lives, careers, and families in the United States.

There is also clear evidence of substantial U.S. educational investment. Of 148 respondents, 67% attended school in the United States. The most common credential earned domestically is a master's degree (85 instances), followed by bachelor's degrees (43) and doctorates (29), with an average of 1.1 U.S.-obtained degrees per respondent. Funding sources further reinforce this investment: many respondents financed their education through personal savings (43), family support (36), university or college scholarships (29), and research or teaching assistantships (28). Only 15 respondents relied on U.S. student loans, indicating that the financial burden of their education was largely self-funded.

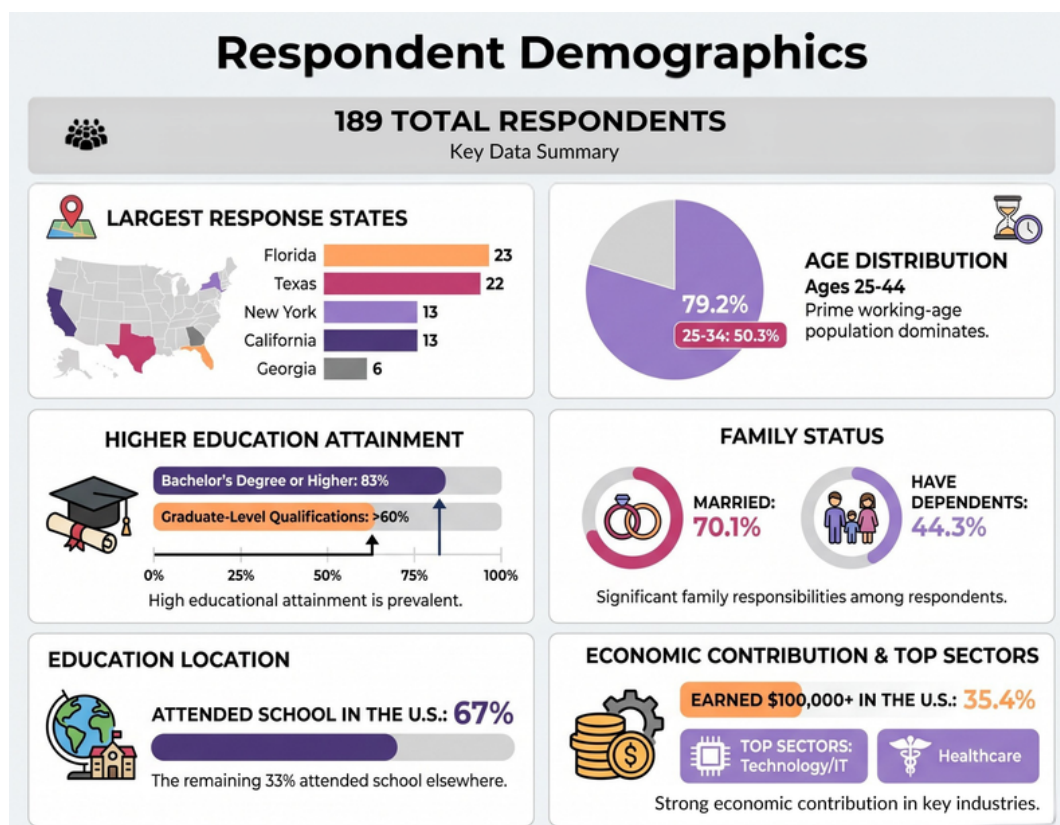


Figure 2: Profile and Economic Contribution of Impacted Immigrants

The pause affects individuals across a wide spectrum of immigration categories, from H-1B skilled workers and F-1 students on OPT/STEM OPT to asylum applicants and those with pending Adjustment of Status (I-485) applications. Notably, “pending adjustment of status” is the dominant category, accounting for 60 out of 145 respondents (40.3%).

These individuals have already submitted their green card applications and passed initial eligibility screening but are now frozen mid-process, making them particularly vulnerable as they await final adjudication. H-1B visa holders represent the second-largest group, with 21 respondents (14.1%). Given that H-1B status is employer-dependent and time-limited, delays in adjustment create cascading risks, including visa expiration, restricted job mobility, and travel limitations—issues that are further explored in the legal and employment impact sections.

The I-485 (Adjustment of Status) is the most commonly affected application, cited by 93 respondents. This is followed by the I-765 (Employment Authorization Document) at 83 respondents, which directly contributes to employment instability. Additionally, 39 respondents reported impacts to their I-130 (family-based petitions), and 23 to their I-131 (travel documents/advance parole). Importantly, many respondents have multiple applications affected simultaneously, compounding their legal and economic vulnerability across several dimensions.

Timing data further shows the structural nature of the disruption. A majority, 71.4% of respondents (100 out of 140), filed their most recent application before December 2025. This indicates that these are not last-minute filings in anticipation of a policy shift, but rather long-pending cases that were abruptly halted mid-process. Among respondents with pending I-485 applications, 43 are family-based and 28 are employment-based (EB-2). The implications are particularly significant for family-based cases, as each application often represents multiple individual spouses, children, and parents, whose lives are collectively placed on hold.

The financial burden associated with these immigration processes is both substantial and non-recoverable. Among respondents, 37 reported paying between \$2,500 and \$4,999 in USCIS filing fees, 27 paid between \$5,000 and \$7,499, and 17 paid over \$10,000. Legal expenses further increase this burden: 35 respondents spent between \$5,000 and \$9,999 on attorney fees, 20 spent between \$10,000 and \$19,999, and 5 reported costs exceeding \$20,000. For many, total out-of-pocket immigration-related expenses exceed \$15,000 to \$25,000, representing significant financial investments into a process that has now been indefinitely paused.

The global work experience profile of respondents reflects a highly experienced population. The largest group (33.3%) reports 6–10 years of total professional experience, representing 48 out of 145 individuals. The second-largest group (22.9%) has 3–5 years of experience.

Notably, a substantial share of respondents are more advanced in their careers: 19.4% report 11–15 years of experience, 5.6% have 16–20 years, and 7.6% have over 21 years of professional experience.

U.S.-based work experience data further highlights a critical point: the adjudication pause is not primarily affecting newcomers to the labor market. Instead, it disproportionately impacts individuals who have already spent years, often close to a decade, building careers and contributing economically in the United States. The largest group (34.3%) has 3–5 years of U.S. work experience (49 out of 143 respondents), followed by 26.6% with 6–10 years (38 respondents). In total, 60.8% of respondents have between 3 and 10 years of U.S. work experience. These individuals represent mid-career professionals who have moved beyond initial labor market entry, developed institutional knowledge, and become integrated into their workplaces and communities.

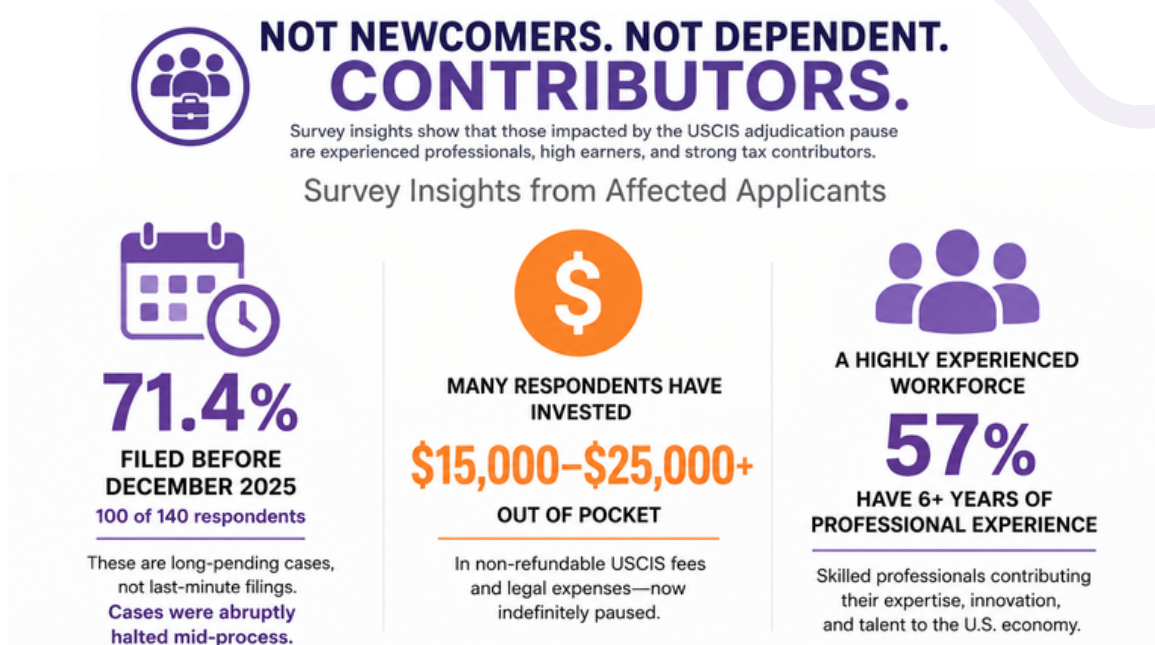


Figure 3: Characteristics of Individuals Impacted by the Adjudication Pause

Income data further highlights the economic significance of this population. Among 147 respondents, 35.4% (52 individuals) report earning \$100,000 or more as the highest annual income in the United States. This includes 21 individuals earning \$100,000–\$149,999, 14 earning \$150,000–\$199,999, 9 earning \$200,000–\$299,999, and 8 earning \$300,000 or more. This distribution reflects a highly skilled, high-earning workforce rather than a population reliant on public assistance. The cohort with 6–10 years of U.S. work experience emerges as the highest-earning group. Within this segment, income levels are particularly strong: 10 individuals earn \$75,000–\$99,999, 7 earn \$100,000–\$149,999, 5 earn \$150,000–\$199,999, 3 earn \$200,000–\$299,999, and 4 earn \$300,000 or more. This group represents individuals in or approaching peak earning years. However, the largest income group falls within the \$75,000–\$99,999 range (29 out of 138 respondents).

Tax contribution data, often overlooked, provides further evidence of the fiscal impact. Among 147 respondents, 28 report having paid between \$5,000–\$14,999 in federal taxes, 22 paid \$15,000–\$29,999, 18 paid \$30,000–\$49,999, 20 paid \$50,000–\$99,999, and 21 report paying more than \$100,000 in total federal taxes during their time in the United States. At the state level, among 146 respondents, 29 paid \$2,000–\$9,999, 17 paid \$10,000–\$19,999, and 19 paid more than \$20,000. These figures demonstrate that respondents are consistent tax contributors whose ability to continue generating revenue for federal and state governments is now constrained by the pause on work authorization.

Sectoral representation further reinforces the importance of this workforce. Technology/IT (30 of 138 respondents) and Healthcare (29 respondents) are the most represented sectors—both of which face well-documented labor shortages in the United States. The adjudication pause is therefore directly removing skilled workers from critical industries. Respondents are also well represented across finance, engineering, research, and consulting, indicating broad contributions across high-value sectors of the economy.

Taken together, these findings demonstrate that affected individuals are not only established professionals but also significant contributors to the U.S. economy through both labor and tax revenue.

THE BIG PICTURE

Respondents have paid *substantial federal and state taxes*, contributing thousands of dollars to public revenue.

They are established *mid-to-senior career professionals* with years of U.S. work experiences.

They work in *critical, high-value sectors* that drive innovation, productivity, and economic growth.

The pause on work authorization constrains their ability to continue contributing to the U.S. economy and tax base.

Direct Impact: The Human Cost of a Processing Freeze

Direct Impact: The Human Cost of a Processing Freeze

The USCIS adjudication pause has produced immediate and measurable consequences for affected immigrants and their families. While the impacts manifest in different ways, they are connected by a common mechanism: the interruption of immigration benefits and work authorization needed to maintain employment, educational progression, financial and housing stability, and legal certainty. The findings suggest that the pause functions not as a simple administrative delay, but as a disruption that places individuals and households in a state of prolonged uncertainty and vulnerability.

When Work Authorization Lapses

For hundreds of thousands of immigrants, the Employment Authorization Document (EAD) is the legal permission to work. When the pause froze the processing of EAD renewals, it did not merely delay paperwork but removed the legal right to earn an income from people who were already employed, contributing and embedded in the US economy. Among survey respondents, 27.5% report being unemployed because their work authorization lapsed or was never issued as a result of the pause. This is not structural unemployment nor market-driven job loss, but a policy-induced joblessness.



These are not entry-level or easily replaceable workers. Among those unemployed due to authorization constraints, 1The adjudication pause has removed the kind of highly credentialed, high-earning professional the United States immigration system was designed to attract. Regression analysis identifies loss of employment authorization as the single strongest predictor of financial hardship.

These respondents face 8.5 times greater odds of reporting financial hardship. Notably, advanced degrees do not insulate individuals from financial collapse when the policy removes their right to work.

Policy-Induced Unemployment by Education Level

Percentage of professionals rendered **unemployed by the USCIS adjudication pause** rather than market forces, categorized by educational attainment.

Educational Level	Number Unemployed Due to Lack of Work Authorization	Unemployment Rate Due to Lack of Work Authorization (%)	Share with 1+ Year of U.S. Work Experience (%)
High school diploma or equivalent	3	50	67
Some college (no degree)	2	22	100
Associate degree	1	11	100
Bachelor's degree	11	33	73
Master's degree	13	24	85
Professional degree (MD, JD, etc.)	5	36	80
Doctorate (Ph.D., Ed.D., etc.)	5	21	60
All Educational Level	41	28	82

While the U.S. immigration system is designed to attract top-tier talent, the current adjudication pause has effectively removed the legal right to work for professionals with significant U.S. career tenure and doctoral-level expertise.

Figure 4: Unemployment Rate and US Work Experience by Education Level

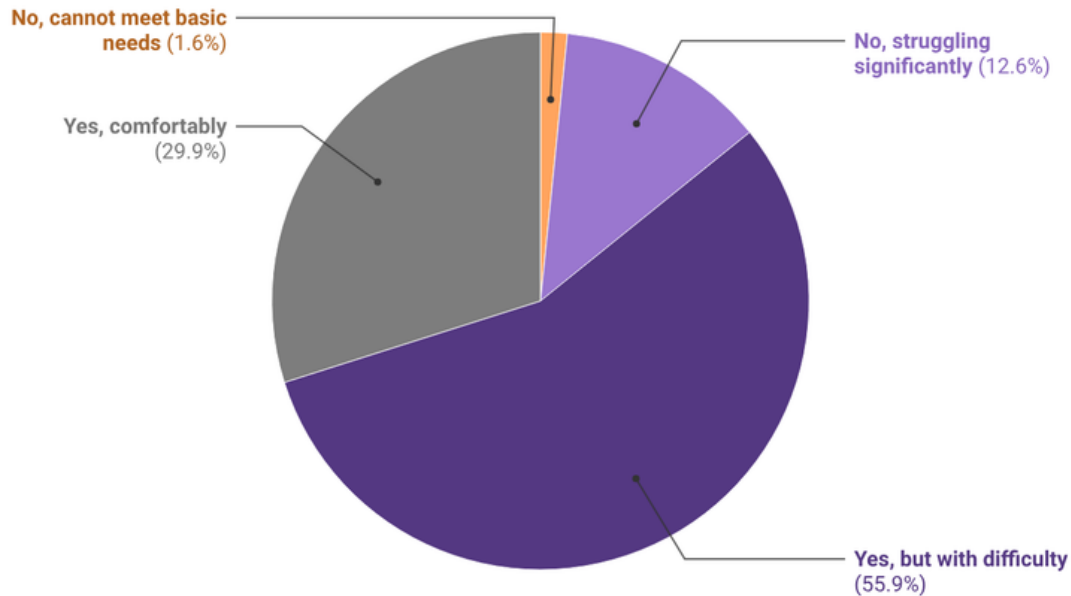
The Financial Cascade from Income Loss

When income stops, savings are drawn down and debt accumulates. This is the documented experience of the majority of respondents in this survey. Of the 125 respondents who answered the financial impact question, 94 (or 75.2%) reported experiencing at least one financial consequence directly attributable to the adjudication pause. The average respondent affected is managing 2.22 simultaneous financial challenges.

For the pattern of coping, the common response was the withdrawal of savings or retirement funds, reported by 49 respondents. Among them, 29 are aged 25 to 34, individuals for whom early retirement withdrawals carry a 10 percent federal penalty on top of income taxes. Emergency savings were depleted by 48 respondents. Once those reserves are gone, the only remaining buffer is debt.

Only 3 in 10 Respondents Can Comfortably Meet Their Basic Needs

As processing delays exhaust personal reserves, only **29.9% of respondents** remain able to comfortably meet basic needs like food, healthcare, and housing.



Respondents were asked to assess their current ability to meet basic financial needs. Categories reflect self-reported financial adequacy at the time of the survey. Financial hardship is directly attributable to the adjudication pause, not to pre-existing economic conditions.

Figure 5: Meeting Basic Needs: How Respondents Are Coping

Credit card debt is the most common form, reflecting its accessibility, but it comes at a steep cost, average credit card APRs currently range from 20-25%, making it one of the more expensive forms of borrowing available to respondents. Many respondents reported using multiple debt instruments such as personal loans, borrowing from family, medical debt, and missed housing payments. This has long-term implications. 27.2% of respondents report decline in their credit scores as a direct consequence of the pause.

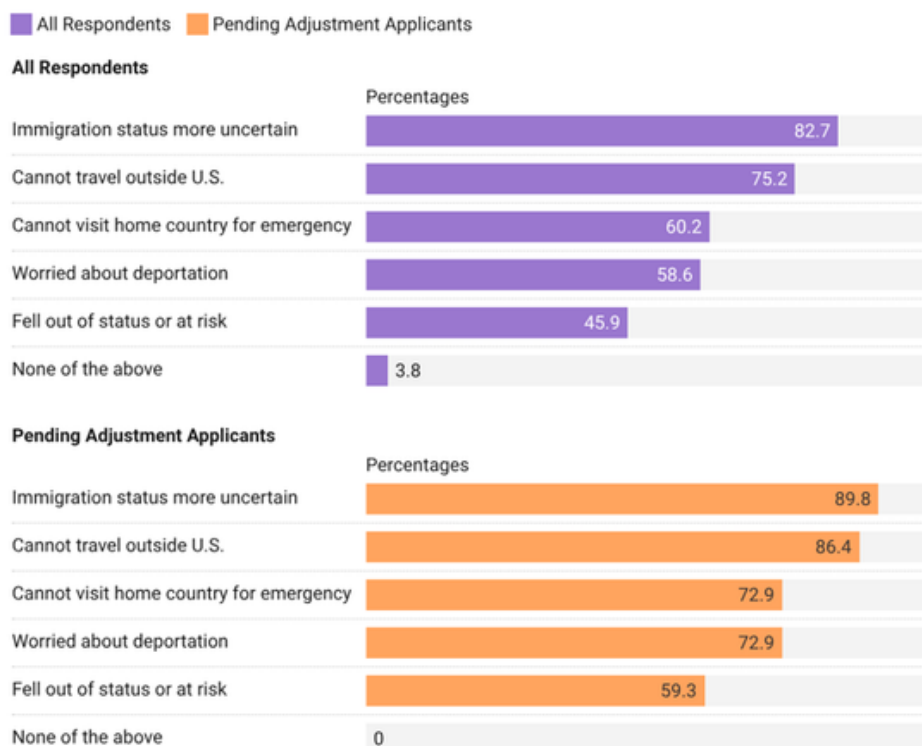
This could in turn affect access to housing, loans, and in some cases employment. This shows a delay and reversal of financial progress. The consequences extend into basic needs. Over 25 individuals cannot meet housing payments, afford healthcare or food, or pay utility bills. Out of 127 respondents, only 29.9% report being able to comfortably meet their basic needs.

Confined within Borders: Travel Restrictions and Immigration Limbo

The legal consequences of the pause are among the most existential findings. For individuals with pending adjustment of status application, leaving the US without an approved Form I-131, advance parole, constitutes abandonment of the pending case. Since the pause from I-131 processing as well, departure has become legally untenable for the majority of respondents. Out of 133, 100 respondents report being unable to travel outside the US. The fear of deportation is widespread as 82.7% of respondents say their immigration status has become more uncertain and 45.9% are either already out of status or at imminent risk of falling out of status. Regression analysis finds that pending adjustment of status applicants accumulate approximately one additional legal impact relative to all other respondents. These are individuals who followed established immigration procedures, submitted their applications in good faith, and complied with all applicable requirements, yet now find themselves facing prolonged uncertainty due to circumstances beyond their control.

Pending Adjustment Applicants Face Greater Legal Jeopardy Across Every Impact Category

While the adjudication pause creates broad uncertainty, individuals with **pending Permanent Residency** face a higher concentration of legal barriers, including a near-total inability to travel.



Pending adjustment applicants are those awaiting a decision on Form I-485 (Application to Register Permanent Residence). This group cannot depart the U.S. without an approved Form I-131 (Advance Parole), which the pause has also frozen — making travel legally equivalent to case abandonment. Percentages reflect share within each group.

Figure 6: Legal Consequences of Immigration Delays Among All Respondents and Those with Pending Adjustment of Status

Stress in the Face of Housing Insecurity

Every respondent who reported a housing impact also reported at least one adverse health consequence. This overlap is the predictable result of prolonged financial stress compressing into a single experience of destabilization. Logistic regression on housing hardship finds that respondents unemployed due to lack of work authorization face nearly three times greater odds of experiencing housing hardship.

Among 130 respondents, 89% reported anxiety and depression. Over half reported sleep disruption. 40% reported physical health deterioration, rising to 44.7% among those who had lost work authorization. Self-reported stress levels have reached a ceiling. The mean stress score across 127 respondents is 8.95 out of 10. The median is 10, the maximum possible score. Regression analysis found that no demographic variable – age, income, gender, or education – could predict variable in stress. The pause simply compressed everyone to the same breaking point.

The Psychological Toll of the Adjudication Pause

Among 130 respondents directly affected by the pause, nearly 9 in 10 reported anxiety, depression, or heightened stress.

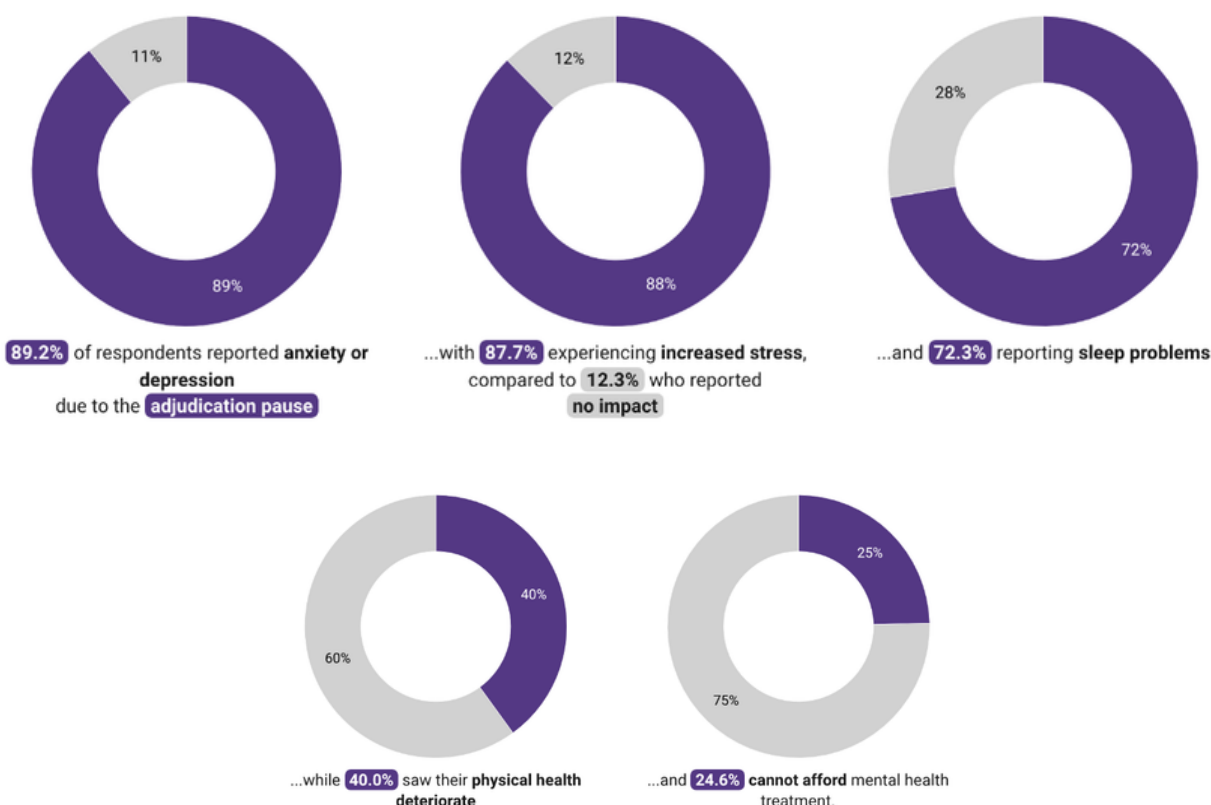


Figure 7: The Psychological Toll of the Adjudication Pause

Disproportionate Impact on Vulnerable Groups

Although the pause affects a broad range of immigrants, certain groups face heightened vulnerability: the Optional Practical Training (OPT) and STEM-OPT participants, women in caregiving roles, refugees and asylum seekers, and families with dependent children. OPT participants occupy a structurally exposed financial position that most other applicants in this survey do not share. They have ended their student status, and with it, their access to campus employment, student-rate housing, and university health insurance, but have not yet secured the income that replaces that support.

For STEM-OPT applicants, the pause means their extension application cannot be adjudicated before their current work authorization expires. Once expired, they lose the right to work- even while fully employed with a qualifying employer even if their extension was filed months in advance. The mean stress level of 8.92 out of 10 and an anxiety/depression rate of 100% reflect the psychological toll of sitting in professional and legal limbo. Most critically, 67% of OPT/STEM-OPT participants are considering leaving the United States. This represents a clear signal of impending talent loss, as fully funded Ph.D. graduates consider leaving the United States, resulting in the loss of the substantial training, mentorship, and financial investments that universities have made in developing their expertise. This represents a clear signal of impending talent loss, Women represent 33.6% of survey respondents.

Across multiple regression models, female respondents show directionally consistent evidence of elevated financial vulnerability, reduced ability to meet needs, and greater housing risk relative to male respondents, even after controlling for income, education, employment status, and all other measured covariates. The effects do not uniformly achieve statistical significance, a limitation attributable in part to the small female subsample. But their direction and magnitude across models are consistent enough to warrant careful interpretation rather than dismissal. Out of the 50 women in the survey sample, 21 have dependents. The mean financial impact count of 3.2 simultaneous hardships (out of 8 measured) is among the highest of any subgroup, and the anxiety/depression rate of 100% reflects the psychological cost of managing poverty and immigration uncertainty while raising children.

Unlike other visa holders who retain an underlying nonimmigrant status during pending applications, many asylum seekers have no alternative legal status on which to fall back if their application is frozen.

Unlike other visa holders who retain an underlying nonimmigrant status during pending applications, many asylum seekers have no alternative legal status on which to fall back if their application is frozen. When their claim is paused indefinitely, they are constantly exposed to the risk of enforcement action. Identified by asylum applicant immigration status, this group has 5 respondents (2.6% of survey sample). However, data shows a stress level of 9.7 and a legal impact count of 2.4 simultaneous legal harms per person, including a deportation fear rate of 60%.

For 44.3% of survey respondents, 66 individuals supporting at least one dependent, the adjudication pause is also a matter of child welfare. Among these respondents, 33 support one child, 15 support two, and several support three or more. Regression analysis confirm that having dependents is one of the strongest predictors of severe financial hardship in the survey. For a respondent who is simultaneously unemployed due to lack of authorization and supporting dependents, the combined predicted deficit is approximately 0.70 points below baseline, shifting the predicted financial adequacy score from comfortable toward struggling significantly.

The harm becomes more severe when multiple vulnerabilities coincide. For example, a woman on STEM-OPT with a dependent child, from a designated country with an asylum history, does not face four separate disadvantages. She faces a single, intensified crisis in which each condition amplifies the others: the OPT authorization gap removes income at the moment it is most needed; the caregiving responsibility constrains the informal and informal substitutes for that income; the dependent child makes housing insecurity legally and developmentally more costly; and the asylum-related status uncertainty makes every administrative interaction higher-stakes and every option for relief harder to access.

When respondents belong to more than one vulnerable group, the harm they experience is disproportionately worse than a simple sum of each group's individual burdens. Every additional vulnerability category independently raises financial hardship, stress, and likelihood of leaving the U.S.

Indirect and Systemic Costs: The Ripple Effect

Indirect and Systemic Costs: The Ripple Effect

The direct cost of the pause is visible in the lives of individuals. The indirect costs are larger, slower-moving, and in some respects more consequential for the United States. When highly skilled workers are removed from the labor force by administrative action, through the losses that follow, there is a ripple effect on tax revenues, sector productivity, and the long-term signal the policy sends to skilled migrants worldwide about whether the US remains a reliable destination for talent. This section draws on both survey evidence and existing economic literature to trace those ripple effects.

Human Capital Loss and Workforce Inefficiency

The sudden loss of work authorization does not just hurt the worker; it also forces US employers to abruptly terminate trained staff in critical sectors like healthcare or technology.

This is particularly consequential given that more than half of doctorate holders working as computer and mathematical scientists (58%) and engineers (56%) in the United States are foreign born (National Center for Science and Engineering Statistics, 2024)



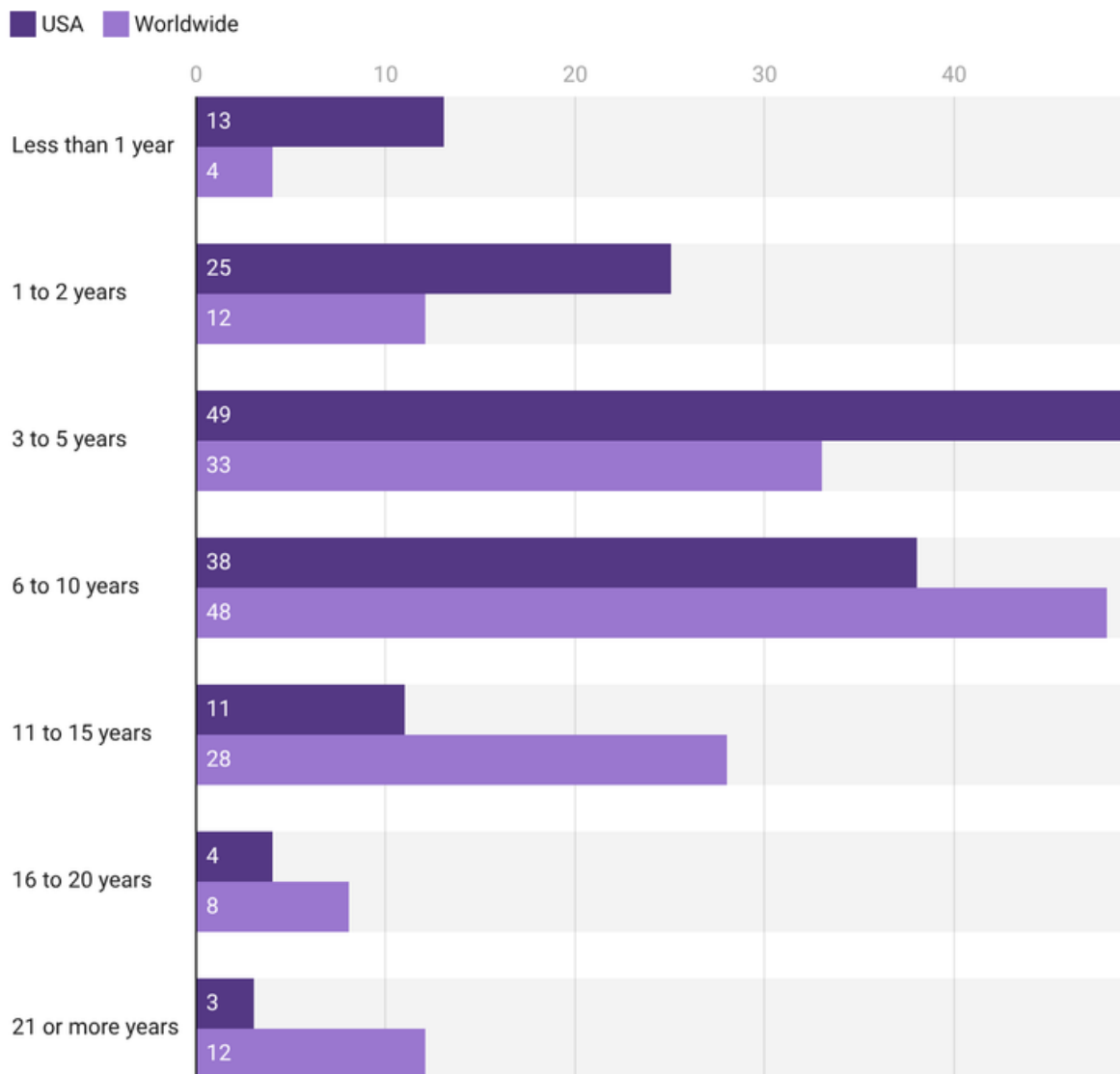
Kerr and Kerr (2016) find that high-skilled immigrants are significantly overrepresented among patent holders and firm founders, generating spillover benefits, through patent citations, firm formation, and employment creation, that extend well beyond their own direct contributions.

Among 41 respondents who are unable to work due to lack of employment authorization, 22% previously earned \$100,000 or more annually. These are not new entrants learning their industries; they are established professionals with institutional knowledge and productive capacity accumulated over years.

These represent foregone economic activity: products not built, patients not seen, research not conducted, businesses not launched. The economics literature is clear about what happens when workers of this profile are involuntarily removed from the labor force.

Not Entry-Level: The Professional Experience Lost to the Adjudication Pause

Affected respondents are not new arrivals. The majority have between **3 and 10 years of U.S. work experience**, with many bringing significantly longer **global careers** to the American economy.



*The adjudication pause is not just affecting entry-level workers. It is sidelining **senior professionals** with decades of specialized knowledge. The largest group of respondents brings **6 to 10 years of global experience** to the U.S. economy.*

Figure 8: Years of Work Experience Among Those Affected by the Adjudication Pause

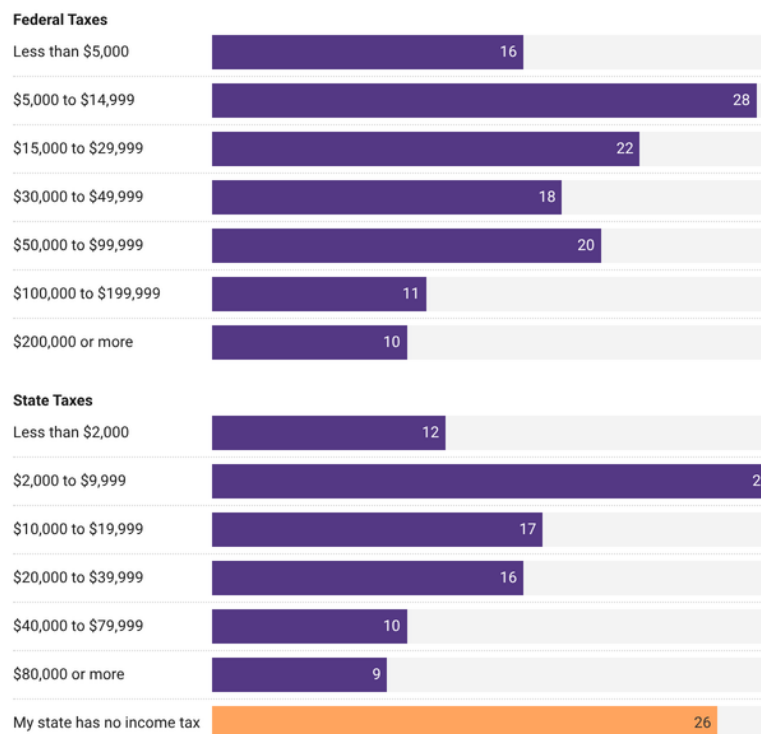
Fiscal Costs: Lost Tax Revenue and Rising Financial Vulnerability

Immigration policy debates in the United States frequently center on fiscal burden. The evidence from this survey shows the opposite. The individuals affected by the pause are substantial taxpayers whose contribution to federal and state revenues are now interrupted. Among 125 respondents who provide tax data, 16.8% reported paying more than \$100,000 in total federal taxes since their arrival in the United States and 14.3% paid between \$50,000 and \$99,000. These are the contributions of individuals who were fully employed, paying into the system, and building long-term fiscal surpluses until pause stopped them.

The National Academies (2017) estimated that college-educated first-generation immigrants produce a positive lifetime fiscal impact of approximately \$173,000 per person in net present value terms, driven primarily by higher earnings and tax contributions relative to public benefits received. The respondents in this survey align precisely with that profile with more than 60 percent hold graduate or professional degrees.

These Respondents Are Taxpayers: Federal and State Tax Contributions Since Arriving in the U.S.

Most survey participants have contributed **between \$5,000 and \$50,000+** in federal taxes. The adjudication pause could effectively **terminates this revenue stream**, creating a measurable fiscal loss.



Source: USCIS Adjudication Pause Impact Survey, 2026. Respondents reported cumulative federal and state income taxes paid since arriving in the U.S. Values reflect number of respondents per bracket, not dollar amounts. For state taxes, 26 respondents reside in states with no income tax.

Figure 9: Respondents' Federal and State Tax Contributions Since Arriving the United States

The fiscal cost of removing them from the workforce is not trivial. Additionally, the private financial distress documented in Section 3 carries a cost. The individuals are not becoming a public charge; they are drawing on their own assets to survive. But each month the pause continues, private reserves diminish further and the downstream risk of longer-term financial instability grows.

Household and Community Ripple Effects

The pause places significant strain on households and family support networks. Survey findings show that many affected individuals have been forced to rely on financial assistance from relatives in the United States or abroad, while others have exhausted savings and accumulated debt without any external support. The pause has also contributed to household restructuring, with some respondents losing independent housing and moving in with family or friends, creating additional pressures. Additionally, these effects ripple through immigrant communities by weakening the informal networks that often serve as sources of economic and social support. Immigrant communities rely heavily on family ties, community organizations, religious institutions, and social networks to provide housing referrals, employment opportunities, childcare and legal guidance.

Ebaugh and Chafetz (2000) document that immigrant congregations routinely function as what they call 'religious social service agencies,' providing material assistance, legal referrals, and psychosocial support that substitutes for formal social services the immigrant population cannot easily access. However, when large numbers of community members experience hardship simultaneously, these support systems become strained. Beyond households and local communities, the pause generates broader economic and transnational consequences. Financial hardship among affected immigrants reduces spending within immigrant-serving businesses and local economies, while delays also prevent some individuals from launching businesses that could create jobs and generate tax revenue.

Brain Drain: Talent Signal Risk to the United States Competitiveness

A major consequential indirect cost of the pause is what it is signaling. The United States does not recruit skilled immigrants passively; it competes for them. Canada, Germany, Australia, and the Netherlands have all substantially expanded and streamlined their high-skill immigration pathways in recent years, explicitly positioning themselves as stable and predictable alternatives. The pause sends a message to skilled immigrants worldwide: years of compliance, investment, and professional contribution offer no protection against administrative reversal. Survey data captures the behavioral consequence of that signal. 60.9% percent of respondents have considered leaving the United States. 23.4% are seriously considering or actively planning to depart.

Among the 78 respondents considering, seriously considering, or planning departure are technology workers, healthcare professionals, and PhD holders. Regression analysis finds that higher education is a significant positive predictor of considering departure. Also, respondents experiencing housing instability are particularly likely to be considering leaving. The OECD's International Migration Outlook consistently documents that high-skill migration flows are sensitive to policy signals. Countries perceived as unpredictable in their immigration administration lose not only current residents but future applicants. Once a country acquires a reputation for policy instability, the damage to its talent pipeline persists well beyond the policy itself.



USCIS ADJUDICATION PAUSE: THE RIPPLE EFFECT

A pause today. A lasting impact tomorrow.

WHO IS IMPACTED?	IMMEDIATE / SHORT TERM IMPACT (Days to Months)	LONG TERM IMPACT (Months to Years)	INDIRECT (RIPPLE) IMPACT Across the Ecosystem
INDIVIDUALS Applicants, Workers, Students, Immigrants	- Delays in work authorization and EAD renewals - Inability to travel or return to the U.S. - Stress, anxiety, and uncertainty - Missed opportunities (jobs, school, benefits)	- Career stagnation and income loss - Aging out of status or losing eligibility - Mental health and well-being decline - Long-term disruption to life plans	- Loss of talent and potential - Reduced consumer spending - Brain drain to other countries - Human capital underutilized
FAMILIES U.S. Citizen & Immigrant Families	- Separation due to travel restrictions - Delayed green cards and reunification - Inability to plan weddings, births, or moves - Emotional and financial strain	- Prolonged family separation - Children aging out or facing uncertainty - Impact on education and stability - Intergenerational consequences	- Strained family systems - Increased demand for social services - Weaker community fabric - Emotional toll across generations
BUSINESSES Employers, Startups, Industry	- Delays in hiring and onboarding - Project and contract slowdowns - Increased legal and operational costs - Uncertainty in workforce planning	- Talent gaps and reduced innovation - Loss of competitive edge - Business expansion and investment delayed - Higher costs passed to consumers	- Slower economic growth - Reduced productivity - Fewer startups and job creation - Global companies invest elsewhere
COMMUNITIES Schools, Local Services, Nonprofits	- Schools lose students and funding - Local services face increased demand - Nonprofits stretched thin - Cultural and civic engagement declines	- Population decline or stagnation - Reduced tax base and public resources - Decline in local businesses - Weaker community resilience	- Disinvestment in neighborhoods - Increased inequality - Erosion of social cohesion - Decline in quality of life
UNITED STATES Economy, Innovation, Global Leadership	- Slower economic activity - Backlog and inefficiency in system - International student and talent loss - Global perception of instability	- Weaker global competitiveness - Innovation and leadership threatened - Demographic and labor shortages - Long-term GDP and tax revenue impact	- Loss of global influence - Weaker alliances and partnerships - Security and humanitarian impact - America falls behind
THE BOTTOM LINE The adjudication pause doesn't just delay cases—it delays lives, weakens communities, and holds back the nation.			
SOLUTIONS START WITH AWARENESS. Timely adjudications = Stronger Individuals. Stronger Families. Stronger Businesses. Stronger Communities. A Stronger United States.			

Figure 10: The Ripple Effect of the USCIS Adjudication Pause

Real Stories from Real People

Real Stories from Real People

Approximately 28 respondents provided more commentary about how this USCIS administrative pause has affected their everyday lives. At the center is the overarching theme of the pause's impact on individuals and families, with six major areas of disruption: family separation, employment disruption which consequently causes financial hardship, mental and emotional wellbeing.

Many respondents described having to postpone major life decisions as marriage, divorce, and college education. The comments provided by survey respondents demonstrate that the USCIS pause is more than an immigration processing issue, but a policy that has profound social, economic and emotional consequences to immigrants and their American families.



Figure 11: The Human Impact of the Adjudication Pause

Policy Recommendations

Policy Recommendations

In light of these findings, there is a clear and urgent need for targeted policy intervention.

- ***Ensure genuine, verifiable, agency-wide compliance with the Dorcas vacatur.***

A court order vacating a policy is only as effective as an agency's compliance with it. In the days immediately following the June 5, 2026 ruling, applicants and immigration practitioners reported calling USCIS and being told their cases remained "still on hold," notwithstanding the court's order. This is consistent with a pattern already visible elsewhere in this report: USCIS has repeatedly announced policy changes, including the limited case-by-case exceptions process announced March 30, 2026, without providing field offices, service centers, or contact center staff with operational guidance clear enough to keep frontline communication in step with stated policy. The court's own June 11, 2026 order, which directed USCIS to report on its compliance within 24 hours, reflects the same concern at the judicial level.

To close this gap, USCIS should be required to: issue and publicly post internal operational guidance to every service center, field office, and USCIS Contact Center confirming that PM-602-0192, PM-602-0194, and PA-2025-26 are vacated and may no longer be cited, relied upon, or referenced in any adjudication, scheduling decision, or applicant communication; retrain contact center staff so that applicants calling about a case affected by the vacated policies receive accurate, current information rather than outdated hold status; and submit a public compliance report, no less than every 30 days for the duration of the pending appeal, documenting the number of previously held cases that have been adjudicated, denied, or remain pending, broken out by form type and country of origin.

- ***Expedite EAD Adjudications for Applicants Facing Employment Disruption***

The single strongest predictor of financial hardship in this survey is loss of work authorization. Respondents whose EADs have lapsed face the full cascade of consequences documented in Section 3: income loss, debt accumulation, housing instability, and health deterioration. Many of these individuals filed renewal applications months before their existing authorization expired; they are not new applicants but established workers whose legal right to earn has been administratively removed while their applications remain pending.

USCIS has existing authority to prioritise EAD adjudications by urgency; that authority should be exercised immediately for any applicant whose current authorisation has expired or will expire within 90 days. The evidence base for this recommendation is direct. Among the 41 respondents unemployed due to lack of work authorisation, 13 hold Master's degrees, 5 hold doctorates, and 5 hold professional degrees. Four previously earned above \$100,000 annually; three earned between \$150,000 and \$199,000. These are not marginal cases. They represent a policy-induced removal of qualified, employed professionals from the workforce.

- ***Establish and publish a transparent processing timeline for affected applications, updated monthly.***

A consistent theme across the qualitative data in this report is the compounding psychological cost of uncertainty itself; not only the loss of work authorization or income, but the inability to plan, make decisions, or understand when resolution might occur. The mean stress score of 8.95 out of 10, with a median of 10, reflects in part the absence of any administrative communication about timelines. Since the ruling, USCIS has not published a consolidated accounting of the backlog created by the pause, nor a target date for clearing the cases delayed by more than six months.

The transparency obligation set out in this recommendation should now extend specifically to: the total number of cases reactivated as a result of the Dorcas vacatur, broken out by form type and service center; a published target date, or range, for clearing cases that have been pending more than 180 days as a direct result of the pause; and monthly public reporting on throughput against that target, comparable to the processing-time reporting USCIS already produces for other case categories.

- ***Treat Form I-131 Advance Parole and travel document applications as a humanitarian adjudication priority, separate from the general backlog.***

The prolonged pause in I-131 processing severed thousands of applicants' ability to visit critically ill or dying family members, attend funerals, support spouses and children abroad, and fulfil basic familial obligations. As USCIS works through the backlog created by the pause, Advance Parole and travel document applications should not be queued on an equal footing with non-time-sensitive filings. USCIS's existing expedite criteria already provide a framework for prioritisation; that framework should be applied liberally to I-131 applications filed during or affected by the pause, with documented medical emergencies, terminal illness of a family member, bereavement travel, and separation from minor children treated as presumptively qualifying circumstances.

- ***Provide targeted relief for OPT and STEM-OPT participants, including tolling of grace periods and correction of EAD validity periods.***

OPT and STEM-OPT participants face the most acute and time-bound exposure of any group documented in this report, and the practical urgency has only increased since the ruling. Two issues require immediate attention.

First, students whose 60-day grace period or 180-day automatic cap-gap extension has run out, or will run out, while their EAD or extension application sits in the post-vacatur backlog should not be treated as out of status or as accruing unlawful presence for that period. USCIS should issue guidance retroactively tolling the grace period and extension clock for any OPT or STEM-OPT applicant whose timely-filed application was affected by the pause, consistent with the tolling and flexibility relief the agency extended during the COVID-19 pandemic.

Without this, students who did everything right, filing well within their window, are at risk of falling out of status purely as a function of the hold. This includes the December 2025 graduating cohort, many of whom have already exhausted both their cap-gap extension and their grace period through no fault of their own.

Second, USCIS should adjust EAD validity periods so that applicants are not penalised twice for the same delay. An applicant whose EAD is issued, for example, six months after the standard validity start date should not simply receive a card carrying five months of remaining work authorization in place of the full period to which the underlying approval entitles them. USCIS should either start the authorised employment period on the date the EAD is actually issued, and extend the end date by the length of the agency-caused delay, so that every approved applicant receives the full period of work authorisation contemplated by their underlying eligibility. Consideration should also be given to extending equivalent protections to the 24-month STEM-OPT extension period.

- ***Automatically refund premium processing fees that did not deliver the promised adjudication, and move affected cases to the front of the queue.***

Premium processing is a paid guarantee, not a discretionary courtesy. Applicants, including those filing in the OPT, EB-1A, and EB-2 National Interest Waiver categories, paid fees that in some categories exceed \$2,800 with the reasonable expectation of a decision, a Request for Evidence, or a denial within a fixed number of business days. Because the pause prevented USCIS from acting within that window, the agency effectively retained payment for a service it did not, and in many cases could not, perform.

USCIS should proactively identify every premium processing request affected by the pause and issue refunds without requiring applicants to separately request them, consistent with the agency's own published refund policy for missed premium processing deadlines. Because vacatur now removes the legal obstacle to adjudication, affected premium processing cases should also be moved to the front of the post-vacatur queue rather than absorbed into the general backlog, so that applicants who paid for speed are not made to wait twice.

- ***Protect job recovery by excluding pause-related delay from unemployment-day limits and supporting rapid re-entry to the workforce.***

For F-1 students on OPT and STEM-OPT, and for other visa holders such as H-1B workers whose status depends on continuous employment, the practical question is not only whether a case is eventually adjudicated, but whether the underlying job, and the worker's legal eligibility to hold it, still exists by the time that happens. OPT participants are limited to a maximum of 90 days of unemployment during the post-completion period; STEM-OPT participants face a combined limit across both periods. Where unemployment was caused by the agency's own failure to adjudicate a timely-filed EAD or extension, that period should not count against the regulatory unemployment limit.

USCIS, in coordination with the Department of Labor and the Student and Exchange Visitor Program, should issue guidance excluding pause-related delay from unemployment-day counts, and should work with employers, through updated guidance to designated school officials and HR departments, to support the rapid re-hiring or reinstatement of individuals whose employment was interrupted solely by the processing freeze, so that the economic and workforce losses documented in Section 4 are not made permanent by a lag between adjudication and re-employment.

- ***Establish congressional oversight of future categorical adjudication pauses.***

The Dorcas ruling addresses this pause after the fact; it does not prevent a future one. A Congressionally mandated review process should be established requiring USCIS to notify Congress and publish a public justification, including the anticipated scope, duration, and affected population, before implementing any future categorical hold on adjudications, with an expedited judicial or congressional review mechanism available before such a hold takes effect rather than only after the harm has accumulated. The roughly seven-month gap between the first hold memorandum in this case and the court's vacatur is itself evidence that retrospective litigation, while ultimately successful, is too slow to prevent the kind of harm documented throughout this report.

Taken together, these recommendations address both the immediate operational consequences of the pause and the structural conditions that allowed a single set of internal policy memoranda to suspend adjudication for applicants from 39 countries with no defined end date, no published backlog figures, and, for several months, no meaningful avenue for relief. The Dorcas ruling confirms that this pause should not have happened. The recommendations above are intended to ensure that its consequences are fully unwound, and that a comparable pause cannot recur without meaningful oversight.

Conclusions

Conclusions

The findings of this report demonstrate that the USCIS adjudication pause represents a clear economic loss for the United States. The individuals affected are highly skilled, economically active, and deeply integrated into the U.S. workforce. They contribute substantially through federal and state taxes, hold advanced degrees, and occupy critical roles in sectors such as healthcare, technology, education, and research. Each month of delay translates into lost productivity, reduced tax revenue, and diminished workforce participation. At a structural level, this policy functions as a self-imposed constraint on the nation's prior investments in human capital. The data also highlights the broader workforce risks associated with continued inaction. A significant proportion of respondents are considering leaving the United States, signaling a credible threat of long-term talent loss to competing countries. Such an outcome would weaken U.S. competitiveness in high-skill sectors and disrupt industries that rely on specialized expertise. This pause has also resulted in real, measurable, and in many cases, potentially irreversible harm to nearly 200 surveyed individuals, and to the significantly larger population they represent. These impacts are not abstract. They reflect the lived experiences of professionals unable to work, families separated across borders, and individuals experiencing severe psychological distress that warrants urgent attention. The widespread psychological strain and family disruption reported by respondents underscore that this is not solely an economic issue, but also a humanitarian one with far-reaching social consequences. The consequences of the adjudication pause extend far beyond delayed case processing. Financial instability, job insecurity, legal uncertainty, and psychological distress interact in ways that compound their effects, producing cascading challenges for affected individuals and families. As these burdens accumulate, an administrative delay can become a prolonged source of economic vulnerability and social disruption, with impacts that are increasingly difficult to mitigate over time.

This report provides a clear, evidence-based foundation for immediate policy action. It is intended to support advocacy efforts, inform congressional engagement, strengthen legal arguments in ongoing litigation, and elevate public awareness of the human and economic costs of prolonged adjudication delays. The data presented here leaves little ambiguity: the current trajectory risks undermining economic productivity, eroding trust in institutional processes, and driving away the very talent the United States has historically sought to attract and retain.

The case for intervention is therefore both compelling and immediate. Without timely and targeted policy responses, the United States risks incurring lasting damage, not only to the individuals affected, but to its broader economic resilience and global competitiveness.

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