

Practice Alert: Updates on Pause on Decisions for Travel Ban Countries¹

Updated 1/15/2026²

On January 1, 2026, USCIS issued [PM-602-0194](#), *Hold and Review of USCIS Benefit Applications Filed by Aliens From Additional High-Risk Countries*, which expands the adjudications pause of all immigration benefits requests for individuals subject to [Presidential Proclamation 10998 of December 16, 2025](#), *Restricting and Limiting the Entry of Foreign Nationals to Protect the Security of the United States* ("PP 10998").

The memo, effective immediately, instructs USCIS personnel to:

1. Place a hold³ on **all** pending benefit applications, subject to certain exceptions and regardless of entry date, for nationals of the countries listed in PP 10998, pending a comprehensive review;
2. Conduct a comprehensive review of all policies, procedures, and screening and vetting processes for benefits requests for nationals of countries listed in PP 10998; and
3. Conduct a comprehensive re-review of approved benefit requests for nationals of countries listed in PP 10998 that were **approved on or after January 20, 2021**.⁴

Nationals of the following countries are subject to the adjudicative hold and comprehensive re-review of approved benefit requests (with countries added by PP 10998 in **bold**): Afghanistan, **Angola, Antigua and Barbuda, Benin, Burkina Faso**, Burma, Burundi, Chad, **Côte d'Ivoire**, Cuba, **Dominica**, Republic of the Congo, Equatorial Guinea, Eritrea, **Gabon, the Gambia**, Haiti, Iran, Laos, Libya, **Malawi, Mali, Mauritania, Niger, Nigeria, Senegal**, Sierra Leone, Somalia, **South Sudan**, Sudan, **Syria, Tanzania**, Togo, **Tonga**, Turkmenistan, Venezuela, Yemen, **Zambia**, and **Zimbabwe**. Individuals with **Palestinian Authority-issued or -endorsed travel documents** are also subject to the adjudicative hold and comprehensive re-review of approved benefits.⁵ Importantly, this includes those "... with a nationality, country of birth, or aliens who have acquired Citizenship by Investment (CBI) listed in PP 10998."⁶

[PM-602-0192](#) remains in effect and is only superseded by PM-602-0194's in regard to the 10 provided "Exceptions to the Adjudication Hold."⁷ Exceptions to the adjudicative hold include:

- Individuals with a pending Form I-90, Form N-565, and Form N-600;
- "[B]enefit requests that are a priority for law enforcement **and where ICE has requested [that] USCIS take adjudicative action** to uphold public safety or national security;"
- Form I-765, categories(c)(11) and (c)(14) **only** when the request comes from law enforcement because the noncitizen is assisting law enforcement; and
- **Initial** Form I-765, category (c)(8)⁸
- Benefit requests for individuals whose entry would serve a United States national interest;

- Benefit requests for athletes or members of an athletic team, including the coaches, persons performing a necessary support role, and immediate relatives for the purpose of participating in the World Cup, Olympics, or other major sporting event as determined by the Secretary of State;
- Benefit requests, or associated underlying benefits, for any programs that are terminated or discontinued as a result of an Executive Order, Proclamation, Federal Register Notice, or Directive issued by the President, the Secretary of Homeland Security, or the USCIS Director; and
- Decisions to automatically terminate automatic or ancillary benefit requests related to when an Individual is granted Legal Permanent Resident status or becomes a naturalized citizen.

Any request for an exception to the adjudicative hold must be coordinated with USCIS's Office of Policy and Strategy (OP&S). Additional guidance from OP&S is forthcoming.⁹ Operational guidance regarding review, interview, re-interview procedures will be issued within 90 days. Practitioners should check that forthcoming guidance for clarity on whether the review, interview, and re-interview process applies primarily to applications *approved* on or after January 20, 2021, or to applicants who *entered* the U.S. on or after that date, given conflicting statements in PM-602-0194.¹⁰