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

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

November 9, 2026

Re: Urgent Request to Rescind the Interim Final Rule Significantly Reducing the Notice of Intent to Terminate Refugee Status from 30 Days to 10 Days (RIN 1615-AD23)

Dear Secretary Mullin and Director Edlow:

The undersigned refugee-serving, faith-based, refugee-led, legal services, veterans, and other humanitarian and community-based organizations write to express our strong opposition to the Department of Homeland Security's (DHS) interim final rule, *Removing 30-Day Refugee Termination Notice*, published October 14, 2026 (91 Fed. Reg. 65077, RIN 1615-AD23). Effective immediately – though enforcement is temporarily blocked by federal court intervention – the rule significantly reduces the time refugees have to respond to a Notice of Intent to Terminate (NOIT) their refugee status from 30 days to 10 days. Shortening the notice period eliminates any meaningful opportunity to contest termination and marks a dramatic departure from U.S. law and longstanding humanitarian commitments.

We urge DHS and U.S. Citizenship and Immigration Services (USCIS) to immediately rescind this rule and halt any actions that would unjustly terminate refugee status, including the unnecessary re-vetting of refugees who are already among the most vetted individuals to arrive in the United States.

Refugees admitted through the U.S. Refugee Admissions Program (USRAP) have already undergone extensive security screening, background checks, and individualized determinations of their eligibility for permanent protection. They were admitted to the United States after the federal government determined that they qualified for refugee status under U.S. law, as well as after undergoing the most rigorous security vetting of any traveler to the United States, involving years of background checks, biometric screening, in-depth interviews, and reviews by multiple U.S. security and intelligence agencies. Many have since established homes, secured employment, enrolled their children in school, and become integral members of their communities. Dramatically accelerating refugee status terminations undermines the stability and protection that the United States promised these families.

A Ten-Day Response Period Denies Refugees a Meaningful Opportunity to Defend Their Status.
Refugee status termination is an extraordinarily consequential determination. The loss of refugee status can jeopardize an individual's protection against removal to a country where they may face persecution or serious harm, authorization to work, access to essential services and ability to remain with family members. The previous 30-day response period provided refugees with a limited but critical opportunity to understand the government's allegations, obtain legal assistance, gather supporting documentation, and prepare a meaningful response.

Reducing that period to just 10 days erects unjust, unnecessary, cruel, and substantial barriers for individuals navigating an unfamiliar and complex legal system, particularly those with limited English proficiency, disabilities, significant medical needs, or limited access to legal representation. Many refugees live in communities where immigration legal services are already overstretched. Locating an attorney, obtaining relevant records, arranging interpretation, and preparing evidence may require substantially more time than the new rule allows.

Although the rule permits refugees to request an interview rather than submit a complete written rebuttal within the initial response period, that option does not eliminate the practical barriers to obtaining legal advice, understanding available procedures, and responding effectively. Procedural protections are meaningful only when individuals have a realistic opportunity to exercise them.

Accelerated Terminations Threaten Refugee Protection and Family Stability.
The *Refugee Act of 1980* established a framework through which the United States provides protection to individuals fleeing persecution and offers a pathway toward permanent residence - a *nondiscretionary* process - and eventual citizenship.

The consequences extend to spouses, children, employers, schools, and entire communities. Families may face uncertainty about their refugee status, employment, ability to remain together, and their future in the United States, while legal service providers and resettlement organizations must respond to increasingly urgent and complex cases. The interim final rule refers to 186,000 unadjusted refugees who arrived between 2015 - 2025 – an extraordinarily large number of potentially impacted community members. These concerns are especially acute amid the administration's broader refugee re-vetting initiatives and ongoing refugee green card adjudication pause.

The interim final rule itself explicitly acknowledged that certain refugees “could reaffirm their status in 30 days but not in 10 days under this rule.” A reliable process must allow sufficient time to the recipient of the NOIT to gather evidence and ensure due process so that decisions with potentially life-altering consequences are made accurately.

Immediate Implementation Raises Serious Concerns About Transparency and Accountability.
DHS wrongfully implemented this rule immediately, without providing the public an opportunity to comment before it took effect, having justified this accelerated approach by citing national

security, public safety, and program integrity. Yet the rule applies a significantly shorter response period to refugee status termination proceedings without adequately resolving the practical challenges refugees face in securing representation and preparing responses. The decision to bypass advance notice and comment is particularly concerning given the substantial consequences of erroneous refugee status terminations.

Refugee-serving organizations, legal service providers, and affected communities possess direct experience with the bureaucratic and legal barriers refugees face. Their input is essential to evaluating whether the new procedures provide a meaningful opportunity to respond and whether they risk producing erroneous outcomes.

We urge DHS to fully consider these concerns rather than allowing a rule with potentially irreversible consequences to remain in effect while public comments are collected. We therefore call on DHS and USCIS to:

1. **Immediately rescind the October 14, 2026 interim final rule (RIN 1615-AD23)** and ensure that affected individuals have a meaningful opportunity to secure legal representation, review allegations, and submit evidence before any termination decision is finalized.
2. **Immediately and fully resume processing of refugee I-485 adjustment of status applications** and create a clear mechanism for members of Congress to request expedited processing particularly for individuals with severe medical conditions.
3. **Immediately cease the unnecessary re-vetting of refugees** who are already among the most vetted individuals to arrive in the United States.
4. **Ensure that any future regulations provide a notice-and-comment period before taking effect** and take into account meaningful feedback regarding the notice of intent to terminate refugee status and any refugee re-vetting practices.

We urge DHS and USCIS to immediately withdraw this rule and uphold the United States' longstanding commitment to protecting refugees through fair and meaningful procedures. We also request a meeting at your earliest convenience to discuss these concerns.

Sincerely,

Global and National Organizations:
Afghan-American Foundation
AfghanEvac
AFT
Allied Shepherd
ANAR
Arab American Institute (AAI)
Asian Americans Advancing Justice (AAJC)
Association of Wartime Allies (AWA)
Autistic People of Color Fund

Black Alliance for Just Immigration (BAJI)
Center for Gender and Refugee Studies
Church World Service
Climate Refugees
Coalition on Human Needs
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Region
ECDC
Equal Rights Advocates
Evangelical Lutheran Church in America
Freedom Network USA
Global Refuge
Grantmakers Concerned with Immigrants and Refugees
Haitian Bridge Alliance
HIAS
Human Appeal
Human Rights First
Immigrant Legal Resource Center
Institute for Policy Studies' Poverty Project
International Refugee Assistance Project (IRAP)
Justice in Motion
Lawyers for Good Government
Mennonite Central Committee
National Advocacy Center for Sisters of the Good Shepherd
National Immigrant Justice Center (NIJC)
National Immigration Law Center (NILC)
National Immigration Project
National Partnership for New Americans
Presidents' Alliance for Higher Education and Immigration
Public Advocacy for Kids (PAK)
Rainbow Railroad
Refugee Advocacy Lab
Refugee Congress
Refugee Council USA (RCUSA)
Sikh American Legal Defense and Education Fund (SALDEF)
Sisters of Mercy of the Americas - Justice Team
Union for Reform Judaism
Unitarian Universalists for Social Justice
United Church of Christ
U.S. Committee for Refugees and Immigrants (USCRI)
We Are All America (WAAA)
Welcoming America
World Relief
Young Center for Immigrant Children's Rights

State and Local Organizations:
Ayuda (District of Columbia)
Borderland Research Initiative (Arizona)
Coalition for Humane Immigrant Rights (CHIRLA) (California)
Dorcas International Institute of RI (Rhode Island)
Hearts & Homes for Refugees (New York)
Immigrant Defenders Law Center (ImmDef) (California)
Inspiritus (Georgia)
Iowa Migrant Movement for Justice (Iowa)
JFCS East Bay (California)
Journey's End Refugee Services (New York)
Kino Border Initiative (Arizona)
Lutheran Social Services of the National Capital Area (District of Columbia)
Maine Immigrants' Rights Coalition (Maine)
North Carolina Justice Center (North Carolina)
Oasis Legal Services (California)
Phoenix Legal Action Network (PLAN) (Arizona)
REACT DC (Virginia)
Water for Ishmael (Ohio)