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Higher Education Alert

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Rhode Island Federal Court vacates USCIS Immigration Benefit Freeze Policies

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The federal district court in Rhode Island struck down four USCIS “hold” and re-review policies that had effectively frozen key immigration benefit adjudications—signaling meaningful limits on agencies’ ability to reshape immigration pathways through internal policy memos rather than lawful process.



What’s the impact?

- In *Dorcas International Institute of Rhode Island v. USCIS* (D.R.I. June 5, 2026), the court vacated four USCIS policies (including the Global Asylum Hold and Benefits Hold) as contrary to law and arbitrary and capricious under the APA.
- The ruling should allow stalled EAD, adjustment, naturalization, and related benefit applications—especially for individuals from travel-ban countries—to resume adjudication absent a stay, reducing disruption to hiring, onboarding, research, and training programs.

On June 5, 2026, Chief Judge John J. McConnell, Jr. of the US District Court for the District of Rhode Island issued a sweeping [135-page decision](#) in *Dorcas International Institute of Rhode*

Island v. US Citizenship and Immigration Services, vacating and declaring unlawful four USCIS policies that had effectively frozen immigration benefit adjudications for individuals from countries subject to President Trump’s travel-ban proclamations and, in the case of asylum applications, applicants worldwide.

The Court held that all four policies violated the Administrative Procedure Act (APA) because they were “contrary to law and arbitrary and capricious.” In doing so, the Court rejected a broad range of jurisdictional and merits defenses and limited the government’s effort to extend travel-ban restrictions beyond entry into the United States and into the adjudication of immigration benefits for individuals already present in the country.

For colleges and universities, however, the significance of the decision extends beyond the immediate policies at issue. While *Dorcas* arises from the travel-ban context, it is fundamentally an administrative-law case that addresses the limits of agency authority, the importance of reliance interests, and the continued availability of judicial review over broad immigration policies affecting individuals already present in the United States. For institutions that have spent the past year responding to visa revocations, SEVIS terminations, travel restrictions, and other immigration-related federal actions, *Dorcas* provides an early indication that courts may be willing to closely scrutinize broad agency efforts to alter established immigration pathways through policy memoranda rather than through congressionally authorized processes.

The four policies struck down

The court vacated four USCIS policies:

- **Global Asylum Hold Policy.** Beginning in December 2025, USCIS indefinitely paused adjudication of asylum and withholding-of-removal applications nationwide, regardless of country of origin.
- **Benefits Hold Policy.** USCIS indefinitely suspended adjudication of immigration benefit requests filed by individuals from designated travel-ban countries, including applications for adjustment of status, employment authorization, naturalization, travel documents, and other immigration benefits.
- **Comprehensive Re-Review Policy.** USCIS directed officers to re-review previously approved immigration benefits for individuals from designated countries who entered the United States on or after January 20, 2021, creating the possibility that previously approved benefits could be reconsidered or revoked.
- **Country-Specific Factors Policy.** USCIS amended its policy manual to direct adjudicators to treat nationality and country-specific concerns identified in the travel-ban proclamations as a significant negative factor when exercising discretionary authority over immigration benefits.

The court concluded that USCIS lacked authority to implement these policies and failed to adequately justify them under the APA.

Impact of the decision on colleges and universities

The immediate effect of *Dorcas* is limited to the four USCIS policies before the court. The Benefits Hold Policy halted adjudication of employment authorization and adjustment-of-status applications for individuals from the countries and jurisdictions currently subject to a full or partial travel ban. As a result, universities employing or sponsoring international faculty, postdoctoral researchers, staff members, physicians, medical residents, and graduates from those countries were particularly affected. For these individuals, delayed adjudications threatened continued work authorization and interrupted employment relationships, research activities, and professional training programs. With the court's vacatur of the Benefits Hold Policy, affected applications should resume adjudication unless a stay is issued pending appeal.

Similarly, the court's decision to invalidate the Country-Specific Factors Policy and concluding that USCIS could not effectively impose nationality-based disadvantages in adjudicating immigration benefits removes a significant source of uncertainty that threatened to delay or complicate permanent-residence processes for individuals from those countries.

The broader significance of the opinion, however, may lie in what it signals about how courts may evaluate future immigration actions affecting international students, scholars, researchers, faculty, and staff. Although *Dorcas* arises from the travel-ban context, its significance extends beyond the travel ban itself. The opinion reinforces that even in areas touching immigration, foreign affairs, and national security, federal agencies remain subject to statutory and APA constraints. Courts retain the authority to determine whether agencies have exceeded the powers granted to them by Congress. The Court rejected the government's effort to characterize the challenged policies as discretionary immigration decisions insulated from judicial review, emphasizing that broad agency policies remain subject to judicial scrutiny when plaintiffs allege that an agency has exceeded its statutory authority.

The Court emphasized that generalized concerns tied to nationality cannot substitute for individualized adjudication or statutory authority. The Court also highlighted that affected individuals had structured educational, professional, and personal decisions around existing immigration pathways and criticized USCIS for failing to meaningfully account for those interests before implementing the challenged policies. The Court's analysis suggests that agencies must account for those reliance interests when implementing significant policy changes. Thus, while the decision does not directly concern F-1 student visas or J-1 exchange visitor visas, the broader signal this decision sends is important when advising students both on campus and during the admissions recruitment process.

What this may signal for immigration policies affecting higher education

Universities have spent the past year responding to federal actions affecting international students, scholars, researchers, and employees, including visa revocations, SEVIS-related actions, travel restrictions, and heightened scrutiny of certain foreign affiliations. Against that backdrop, *Dorcas* rejects the notion that agencies can use broad policy directives to reshape immigration outcomes for large groups of individuals without clear statutory authority.

As a result, the decision may have broader implications beyond the four policies struck down. For example, in *Presidents' Alliance on Higher Education and Immigration v. Bondi*, pending in the District of Massachusetts, plaintiffs challenge the government's mass revocation of student visas and termination of SEVIS records affecting F-1 students and optional practical training (OPT) participants. In March 2026, the court largely denied the government's motion to dismiss, allowing core APA claims to proceed.

Although the two cases involve different immigration programs, both challenge broad agency policies affecting large groups of individuals rather than individualized immigration determinations. While the cases are at very different procedural stages, together they suggest that courts may be increasingly willing to scrutinize whether immigration agencies have exceeded their statutory authority or violated the APA when implementing sweeping policies affecting students, scholars, researchers, and other noncitizens.

Practical takeaways

Leadership in colleges and universities should continue to monitor judicial rulings continuously and closely as rulings can vary by jurisdiction and as appeals proceed.

Institutions may also consider:

- / Identifying employees, researchers, physicians, students, and scholars whose applications were affected by the challenged policies
- / Communicating with affected individuals regarding the court's decision and the anticipated resumption of adjudications
- / Evaluating whether delayed applications may affect hiring, onboarding, sponsorship, workforce planning, medical training programs, or research operations.

Although the decision represents a victory for the plaintiffs and for individuals whose applications were frozen, it is unlikely to be the final word. Given the breadth of the opinion and the significance of the issues involved, further appellate litigation appears likely, including the possibility of the issues eventually reaching the US Supreme Court.

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