



May 2nd, 2025

GLOBAL STUDIES

How can Congress reform the refugee settlement process to reduce bureaucratic delays and ensure equitable access to housing, employment, and essential services for newly arrived refugees?

Presented By:

Sofia Garnica Aguilar
Alvarez

Nikki Hekmat
Yashal Sarfaraz

Jacky Zhengchen Li
Roma Kapoor

Ricarda Concepcion
Suarez Moreno

Richard Zeng

Executive Summary

The U.S. refugee-admissions system is congested, inequitable, and costly. More than two million asylum claims languish in a years-long backlog, while refugees who do reach the United States receive only 90 days of federally funded support and face persistent barriers to English acquisition, education, and stable employment. The purpose of this memo is to identify practicable reforms that would make refugee processing and integration faster, fairer, and less expensive.

Policy alternatives considered

1. ***Maintain current trends (Status Quo)*** - no new federal action
2. ***Increase Federal Staffing to Expedite Application Processing*** - hire additional asylum officers and immigration judges to erase the backlog
3. ***Creation of US-Sponsored Student Programs for Student-Refugees/Asylum Seekers*** - fund university pathways that lead to permanent residence
4. ***Creation of a New Refugee/Asylum Bureaucratic Office modeled after Canada and the UK*** - consolidate the nine NGO and six federal entities now involved, following Canadian and German designs.
5. ***Establish a single Refugee/Asylum Agency*** - a points-based, labor-matching system modeled on Canada's Express Entry

Each option was evaluated on political feasibility (weighted 1.5), efficacy, cost, and equity.

Major findings

- The backlog exceeds 2 million cases, yet only 1,500 adjudicators are available to process them.
- Clearing the backlog solely by adding staff would cost equating \$2 billion.
- Student-visa and labor-matching programs are relatively cost-effective and would improve long-term equity and economic outcomes, but both require new statutory authority.
- A consolidated refugee agency would streamline services and enhance fairness, yet demands the largest up-front reorganization budget (\$13 billion) and is incompatible with current efforts to shrink federal bureaucracy.
- Under the second Trump Administration, Congress and the Executive remain firmly opposed to any expansion of refugee admissions or spending, making political feasibility the dominant constraint across all reform options.

Given today's hostile political environment and the absence of congressional appetite for new funding or restructuring, none of the reform alternatives meets the threshold for near-term enactment. The only implementable course is to preserve the Status Quo while pursuing marginal, budget-neutral improvements, such as docket reprioritization and reallocation of existing grants, to mitigate humanitarian harm. Accordingly, we recommend placing large-scale

reform on hold and revisiting after the 2028 federal elections, when the political landscape may be more conducive to reform.

Define the Problem

The current immigration system in the United States of America is facing issues with processing and integrating refugees into the country. Many of the critiques revolve around the system's issues in inefficiently processing new refugees and asylum seekers due to the slow, overly bureaucratic, and convoluted processes that refugees need to follow. Comparatively, the administrative side of the US immigration system is seen as a resource that fails in processing applicants in a timely manner due to an understaffed administrative infrastructure and an underfunded budget. Further, the support systems for refugees to integrate into American society do not have the resources to provide tangible guidance to these refugees.

One of the main issues with the refugee system is the amount of time it takes for the refugee to receive a visa or citizenship. The process for settlement for refugees includes several background and security checks, which include multiple forms of biometric screening, cross-checks of global fingerprint databases, and medical tests that take between eighteen months and two years to complete.¹ After this, the refugees are allowed into the United States, but that does not mean that they have been resettled. The responsibility begins with the State Department's Reception and Placement Program, which provides funding to go toward refugees' rent, furnishings, food, and clothing. After three months, this responsibility shifts to the Health and Human Service Department, which provides longer-term cash and medical assistance, as well as other social services, including language classes and employment training.² Yet, according to multiple sources, the process remains unclear as to how many years it will take for refugees to be actually resettled.

The first element of this problem is bureaucratic delays. The lack of sufficient infrastructure to support speedy processing of asylum applications leads to an overwhelming backlog of 2 million applications.³ There are only 1,500 immigration judges and asylum officers to process this, while in the meantime the applications keep piling up, with more than 800,000 in 2022.⁴ There is also the matter of red tape, with a hindering efficiency and lengthening the waiting period before a refugee can be integrated into the United States.

The second element rests in the issues of lack of resources in education and employment opportunities. Research has shown that refugees are facing more challenges to find a job that could afford them a decent life in the U.S. In particular, even when they share similar pre-immigration professional experiences, refugees are more unlikely to obtain a job similar to their past occupations. Moreover, a study has found that the language barrier is the most common problem that formed a bulwark on refugees' ability to find a job. Therefore, more attention is

¹Council on Foreign Relations, "How Does the U.S. Refugee System Work," last modified February 9, 2023. <https://www.cfr.org/backgrounder/how-does-us-refugee-system-work-trump-biden-afghanistan>.

² Ibid

³ Sullivan, Eileen. "Asylum in America, by the Numbers." The New York Times, November 21, 2023, sec. U.S. <https://www.nytimes.com/2023/11/21/us/politics/migrant-crisis-border-asylum.html>.

⁴ Ibid

needed to help minimize the barriers that refugees face in the employment process.⁵ Even if refugees manage to remain and stay in the U.S., they face more challenges in retaining their jobs on a long-term basis. The idea of self-sufficiency in policy-making greatly hindered job prospects for refugees who were on low-paying and short-term jobs.⁶ Moreover, the education resources available to refugees and their children are far from successful.^{7,8}

A third element lies in the time-limited resources provided by the U.S. government upon attainment of refugee status that are insufficient in helping refugees establish an adequate educational foundation. The Office of Refugee Resettlement offers a 90-day period of support following settlement in a host city that covers shelter, food, job search assistance, and English classes. As the goal is to produce self-sufficient refugees, this stipend ceases after the completion of the 90 days. While government programs and aid groups offer monetary assistance as necessary beyond this limit, refugee families do not receive the same level of support with educational resources. Acclimating to a new country alongside the traumatic experiences that refugees often face leads children of refugee families to require specialized education support that is not available to them.⁹ The educational opportunities currently provided are insufficient in ensuring refugees are educated to an extent that they can remain self-sufficient and thrive in the United States.

Federal intervention is essential to streamline immigration processing, improve infrastructure, and ensure timely resettlement. The U.S. immigration system is plagued by bureaucratic inefficiencies, excessive delays, and an overwhelming backlog, leaving asylum seekers in legal limbo for years. Even though immigration judges completed a record 313,849 cases in Fiscal Year 2022, the backlog grew by nearly 400,000 new cases that same year, highlighting the urgent need for comprehensive reform to address this crisis.¹⁰ Administrative burdens disproportionately impact vulnerable populations, exacerbating hardship and resource exhaustion.¹¹ Local and state initiatives, such as Philadelphia's immigrant integration policies and California's driver's license expansion, show how localized efforts can support broader

⁵ Hikmet Jamil, Samer S. Kanno, Rami Abo-Shasha, Mazen M. AlSaqa, Monty Fakhouri, and Bengt B. Arnetz, "Promoters and Barriers to Work: A Comparative Study of Refugees Versus Immigrants in the United States," *The New Iraqi Journal of Medicine* 8, no. 2 (2012): 19–28.

⁶ A. Nicole Kreisberg, Els de Graauw, and Shannon Gleeson, "Explaining Refugee Employment Declines: Structural Shortcomings in Federal Resettlement Support," *Social Problems* 71, no. 1 (2024): 271–90.
<https://doi.org/10.1093/socpro/spab080>.

⁷ Amy B. Lerner, "The Educational Resettlement of Refugee Children: Examining Several Theoretical Approaches," *Multicultural Education* 20, no. 1 (2012): 9–14.

⁸ Connors, Ishara Casellas, Lisa Unangst, and Kerri Evans, "Navigating the Tension: US Refugee Resettlement Agency Support of Postsecondary Access," *Journal of Refugee Studies*, feae086 (2025).
<https://doi.org/10.1093/jrs/feae086>.

⁹ J. L. McBrien, "Educational Needs and Barriers for Refugee Students in the United States: A Review of the Literature," *Review of Educational Research* 75, no. 3 (2005): 329–64.
<https://doi.org/10.3102/00346543075003329>.

¹⁰ American Immigration Council, "Beyond a Border Solution: How to Build a Humanitarian Protection System That Won't Break," last modified May 3, 2023.
<https://www.americanimmigrationcouncil.org/research/beyond-border-solutions>.

¹¹ Nora Stel, "Uncertainty, Exhaustion, and Abandonment Beyond South/North Divides: Governing Forced Migration Through Strategic Ambiguity," *Political Geography* 88 (2021): 102391.
<https://doi.org/10.1016/j.polgeo.2021.102391>.

federal reform and help integrate immigrants more efficiently.¹² Addressing these inefficiencies would ensure that asylum seekers can integrate more effectively, promoting a more equitable and functional immigration system.

The primary objective of this intervention is to ensure an equitable and efficient resettlement process for refugees. Achieving this goal will involve evaluating the current asylum procedures and the resources provided to refugees, identifying any gaps in support, and exploring opportunities to streamline the process.

Construct the Alternatives

I. Alternative #1- Let current trends continue (Status Quo)

If present trends continue, refugees entering the United States will continue to face lengthy, complex application processes and difficulty accessing adequate educational resources, which will detrimentally affect their future employment prospects. According to the United Nations High Commissioner for Refugees, the number of displaced people has increased every year for the past 12 years, resulting in nearly triple the number of refugees today compared to a decade ago.¹³ If refugees continue to be forcibly displaced at this rate, current integration policy and application procedures make it increasingly untenable for the U.S. government to adequately host and support these refugees.

II. Alternative #2- Increase Federal Staffing to Expedite Application Processing

Another alternative for increasing the efficiency of refugee resettlement and integration in the United States is to expand federal staffing for asylum claim processing. There is currently a backlog of over two million applications, with wait times averaging from three to ten years, yet fewer than 1,500 judges and asylum officers are handling these cases.¹⁴

Under the proposed policy, staffing would be increased to a point where the backlog could be erased, which would cost \$2 billion¹⁵, before being slightly reduced based on determined need. New jobs would be posted on government sites to recruit more officers, and the Department of Justice would form a task force to appoint more judges. Furthermore, additional funding for these positions would be reallocated from the existing defense budget, ensuring that no new taxes are required.

III. Alternative #3-Creation of US-Sponsored Student Programs for Student-Refugees and Asylum Seekers:

Another alternative is providing more student programs sponsored by the U.S., providing more opportunities for international students to study in the U.S. This will help both integrate refugees into American society and provide them an easier path to citizenship. Over 54% of California Higher Education students are of immigrant origins (newcomers and recent

¹² Adam Lichtenheld, Natalie Chaudhuri, and Sigrid Lupieri, "Resistant to Reform? Improving U.S. Immigration Policy Through Data, Evidence, and Innovation," Carnegie Endowment for International Peace, August 28, 2024. <https://carnegieendowment.org/research/2024/08/united-states-immigration-reform-evidence>.

¹³United Nations High Commissioner for Refugees, Global Trends: Forced Displacement in 2023, accessed March 4, 2025, <https://www.unhcr.org/us/global-trends>.

¹⁴Eileen Sullivan, "Asylum in America, by the Numbers," The New York Times, November 21, 2023, sec. U.S., <https://www.nytimes.com/2023/11/21/us/politics/migrant-crisis-border-asylum.html>.

¹⁵ Ibid.

descendants of immigrants), and among first-generation students, over half are green card holders, refugees, asylum seekers, and undocumented.¹⁶ An increase in these programs would help bring more refugees and asylum seekers into the country, providing them a better opportunity to integrate into society and the workforce, while also helping drive the American labor market.¹⁷ If this program were extended to help refugees stay in the country, an issue that international students largely face after graduation, it would provide a boost to the economy by adding a larger number of educated workers to the American workforce.

Moreover, to create more opportunities in education for refugees in the U.S. would demand a more rigorous visa scheme. This visa scheme would complement the programs that could be implemented in universities. Private donors are a huge source of funding for universities to reward students with particular backgrounds, such as refugee and undocumented students. A proposed visa category, P-4, would entrench such a policy's effectiveness. P-4 status would allow a group or institution to sponsor a refugee. A university program would then allow them to study in the U.S. and then apply for permanent residency. The university would likely source the funding from the private sector, as the federal government is unlikely to provide such funding assistance. Unlike F-1 or J-1 visas, P-4 does not have a financial prerequisite, and P-4 allows refugee asylum application when one is not inside the country. Students would enter the U.S. through a university-sponsored program. Refugees would enter the U.S. with a university-sponsored program, and the selection criteria would be based on academic qualifications and potential, not on vulnerability or protection considerations—to be eligible, students would still need to meet the refugee definition.¹⁸ It is ideal that refugees with high intellectual potential could exemplify their knowledge of other countries, such as the U.S., and improve the image of the U.S. in promoting academic exchange and academic freedom. Adjacent programs have yielded successful results, such as the Fulbright U.S. Student Program, Boren Fellowships, and the Benjamin A. Gilman International Scholarship. Under such visa schemes, refugees have a higher chance of settling their offspring in the country, as they may develop into highly intellectual individuals in the future.

IV. Alternative #4- Creation of a New Refugee/Asylum Bureaucratic Office modeled after Canada and the UK

In order to improve the efficiency, clarity, and effectiveness of the refugee system in the US, a new bureaucratic office for refugees must be created. As of right now, nine nongovernmental and six government agencies handle the refugees, making it confusing and overwhelming. The new office should be modeled after refugee systems like that of Canada, which effectively processes nearly 40,000 refugees. The maximum time to grant asylum is 2 years, and refugees can immediately apply for permanent residence in Canada. In addition, there is great help to assimilate refugees by providing them with orientation programs, skills training,

¹⁶Harvard Immigration Initiative et al., Did You Know?, Presidents' Alliance on Higher Education and Immigration, April 2023, accessed March 4, 2025, <https://www.presidentsalliance.org/wp-content/uploads/2023/04/FINAL-DID-YOU-KNOW-Harvard-Immigration-Initiative-et-al-2023.pdf>.

¹⁷*ibid.*

¹⁸Higher Ed Immigration Portal, U.S. Education Pathways for Refugee Students, accessed March 3, 2025, <https://www.higheredimmigrationportal.org/policy/u-s-education-pathways-for-refugee-students/>.

social services, and pathways to citizenship. After applying through UNHCR, the refugees are matched with private sponsors through the Blended Visa Office-Referred (BVOR) Program.¹⁹ This allows private sponsor groups to help the government in resettling refugees, which takes away some of the pressure from the government bureaucracy. In addition, the Canadian refugee system has a refugee appeal division that handles appeals in case a mistake was made. This new bureaucratic office can take funds from what is now being given to nine nongovernmental offices and be structured in a similar way to the Canadian Immigration and Refugee Board.

V. Alternative #5- Government Labor Opportunity for Citizenship

An alternative to the current U.S. immigration model is the creation of a Government Labor Citizenship program, designed to address labor shortages in key industries such as healthcare, technology, agriculture, and construction. This program would weigh factors such as work experience, education, and language proficiency, modeled after Canada's Express Entry system, to streamline applications for federal economic immigration within a matter of months.²⁰ The application process would include several stages: first, candidates would create a profile and receive a ranking score; next, qualified applicants might receive an invitation to apply; and finally, they would submit a full application for permanent residency, all within a target timeframe of about six months. To ensure immigrant integration and economic success, the program would include workforce training initiatives, credential recognition assistance, and language acquisition support. Similar labor-focused immigration initiatives have demonstrated strong economic outcomes, including higher wages, increased labor force participation, and lower unemployment.²¹ Drawing from Canada's Express Entry model and Germany's Skilled Immigration Act, this program would also establish a clear pathway to citizenship, contingent upon sustained employment, tax contributions, and community integration. By leveraging a points-based system, the U.S. could create a more efficient, merit-based, and skills-driven immigration process while addressing critical labor market gaps.²²

Select the Criteria

1. **Political Feasibility (1.5x):** Political feasibility is the ability of a policy to be successfully implemented in the current political climate of the United States. Successful implementation means that there are low federal barriers hindering the approval of the policy: the legislative branch would agree on it and allocate funds to it, and the executive branch would enact it promptly. Because a policy's feasibility determines whether it can realistically move forward, it carries additional weighting - to ensure that time and resources are not invested in proposals unlikely to gain federal support.

¹⁹Government of Canada, Blended Visa Office-Referred Program: About the Process, accessed March 4, 2025, <https://www.canada.ca>.

²⁰British Council Uganda, Canada Express Entry, accessed March 4, 2025, <https://www.britishcouncil.ug/exam/ielts/canada-express-entry>.

²¹Provincial Nomination Program, CanadaVisa, accessed March 4, 2025, <https://www.canadavisa.com/provincial-nomination-program.html>.

²²Congressional Research Service, R47164: Title of the Report, accessed March 4, 2025, <https://crsreports.congress.gov/product/pdf/R/R47164>.

2. **Efficacy (1x):** The efficacy of the suggested policy implementations is measured using the criteria of temporal and bureaucratic efficiency, and the degree to which integrated, post-aid refugees are able to achieve financial autonomy. Additional metrics include the stability and sustainability of employment, measured by job retention rates and income levels relative to the local cost of living. Relevant data includes the duration of processing and the number of bureaucratic mechanisms an asylum application must undergo from submission to acceptance or rejection, as well as the percentage of integrated refugees who are gainfully employed or enrolled in education systems three months, six months, and a year following the cessation of governmental aid.
3. **Cost (1x):** The cost in the context of the refugee system and the possible new plans of action can be defined as monetary. It is important to consider how much money the entire application process as well as the adjustment process costs. This cost should be multi-dimensional, accounting for government, private, and refugee costs. In addition, cost should also consider possible monetary gains to the American community in which refugees now live.
4. **Equity (1x):** Equity criteria in the context of refugee resettlement in the U.S. measure fairness, inclusivity, and responsiveness to the needs of diverse refugee populations. This is evident when comparing the livelihoods of refugees and those who are born citizens in the U.S., particularly regarding employment and education opportunities. The assessment of equity has a significant impact on improving well-being and socio-economic integration into society. Implementation may reflect medium-paced progression, as it depends on policy changes, funding, and coordination across different levels of federal and local government and agencies. Long-term socio-economic benefits may offset most of the high costs incurred in the beginning.

Projected Outcomes

Alternative #1- Let current trends continue (Status Quo)

Projected Outcomes

Political Feasibility: This alternative proposes that the current refugee processing system (status quo) continue without adjustment. The current administration has announced plans to decrease the number of immigrants accepted, implement stricter protocols for application processing, and increase border security to reduce the number of U.S. asylum seekers. Continuing these trends is highly feasible for the current administration.

Score 7.5/7.5

Efficacy: The current application process is lengthy and resource-intensive for both the government and the applicants. Asylum seekers face extended waiting periods; extensive backlogs, a high volume of applicants, and intensive bureaucratic procedures result in an average wait time approaching 4.3 years. Additionally, recent federal funding cuts under the second Trump administration—targeting sanctuary jurisdictions and reducing housing and employment assistance—have further decreased the efficiency of this process.

Score 2/5

Cost: High application fees, combined with limited access to employment and educational opportunities, place a significant financial burden on applicants. Moreover, processing applications requires significant government funding as federal agencies handle extensive backlogs, conduct interviews, perform background checks, and render case judgments. The interim waiting period for refugees—during which the government provides temporary housing, healthcare, and transitional support—is also costly. Although NGOs and non-profit organizations assist in resettling refugees, as of 2024 the Office of Refugee Resettlement received \$871 million to support transitional, medical, and social needs. Cuts to federal funding for refugee processing programs beginning in 2025 have reduced costs but are projected to result in further inefficiencies.

Score 3/5

Equity: Systemic barriers in the current refugee process disadvantage applicants due to unequal access to resources and a lack of legal representation. Under the current Trump administration, border patrol agents have been instructed to turn away asylum seekers without providing hearings. As a result, lengthy waiting periods and a prolonged “legal limbo” prevent applicants from accessing employment or educational opportunities. Additionally, many face family separation or the prospect of returning to a hostile environment.

Score: 2/5

Alternative #2- Increase Federal Staffing to Expedite Application Processing

Projected Outcomes

Political Feasibility: An increase in federal staffing under the Department of Justice to expedite application processing would be difficult under the current political climate. Under the new Trump Administration, the processing of migrants and asylum seekers has been suspended, along with the U.S. refugee resettlement program.²³ As a result, the existing backlog of cases will likely remain unaddressed, and it is highly improbable that the administration would support expanding staff for a halted program. Nevertheless, this alternative scores a 0.5 for political feasibility because there is a possibility the situation could change—though the current climate is too hostile for significant progress.

Score: 0.75/7.5

Efficacy: Increasing federal staffing would likely improve the efficacy of refugee resettlement in the United States. By hiring more staff, the backlog could be eliminated within five years at a projected cost of \$2 billion. This alternative scores a 3 because it would address the application backlog; however, it is uncertain how much this increased processing efficiency would translate to improved resettlement outcomes.

Score: 3/5

Cost: Raising federal staffing levels enough to clear the application backlog within five years is estimated to cost over \$2 billion, although official figures have not been disclosed.²⁴ This

²³ “US Suspends Refugee Admissions and Tightens Asylum Rules,” BBC News, last modified March 22, 2024, <https://www.bbc.com/news/articles/clyn2p8x2eyo>.

²⁴ Eileen Sullivan, “Biden Administration Faces New Challenges in Border Crisis,” The New York Times, November 21, 2023, <https://www.nytimes.com/2023/11/21/us/politics/migrant-crisis-border-asylum.html>.

makes the alternative an extremely expensive endeavor if enough staff are hired to maximize efficiency. More moderate staffing increases could reduce initial costs, but they would slow backlog reduction and potentially push total expenditures beyond \$2 billion to compensate for reduced efficiency. Consequently, this alternative scores a 0.5 because it will be very costly to reach a productive level of hiring, regardless of the number of employees added.

Score: 1/5

Equity: Increasing federal staffing to expedite application processing would enhance equity in the system by extending resources to serve a greater number of refugees more promptly. This alternative scores a 4 because it strengthens equity in the application process, although it does not guarantee complete equity during the resettlement phase.

Score: 4/5

Alternative #3- Creation of US-Sponsored Student Programs for Student-Refugees/Asylum Seekers:

Projected Outcomes

Political Feasibility: The creation of more federal student programs through Congress would be very difficult within the current political climate. Funding cuts and the functional abolition of the Department of Education have made it difficult to use federal funds to support students because of the breakdown of legal obligations due to a lack of workers.²⁵ Not only this, but this program would need to be approved by Congress, which is currently controlled by conservatives in both houses, a majority of whom are opposed to increasing government funding.²⁶ This makes the political feasibility very low.

Creating additional federal student programs through Congress would be highly challenging in the current political climate. Funding cuts and the effective dismantling of the Department of Education have made it difficult to use federal funds to support students due to the breakdown of legal obligations caused by staff shortages.²⁷ Moreover, any new program would require approval from Congress, where both chambers are currently controlled by conservatives opposed to expanding government funding.²⁸ This would be more politically feasible if statewide programs were initiated to help fund these scholarships; however, ultimately it comes down to the federal government on whether they would create a new visa type to accommodate these refugees. As a result, the political feasibility of this initiative is very low and scores a 2.25.

Score: 2.25/7.5

²⁵ Weiss, Madison. "Cuts to Department of Education's Office of Federal Student Aid Will Leave Students and Borrowers Worse Off." Center for American Progress, March 25, 2025. <https://www.americanprogress.org/article/cuts-to-department-of-educations-office-of-federal-student-aid-will-leave-students-and-borrowers-worse-off/>

²⁶ Republican National Committee. 2024 Republican Party Platform. July 8, 2024. The American Presidency Project. <https://www.presidency.ucsb.edu/documents/2024-republican-party-platform>.

²⁷ Madison Weiss, "Cuts to Department of Education's Office of Federal Student Aid Will Leave Students and Borrowers Worse Off," Center for American Progress, March 25, 2025, <https://www.americanprogress.org/article/cuts-to-department-of-educations-office-of-federal-student-aid-will-leave-students-and-borrowers-worse-off/>.

²⁸ Republican Party, "2024 Republican Party Platform," The American Presidency Project, July 8, 2024, <https://www.presidency.ucsb.edu/documents/2024-republican-party-platform>.

Efficacy: According to the United Nations High Commissioner for Refugees (UNHCR), 7% of refugees are university-aged or university students.²⁹ However, the pool of refugees who both fit this age group and qualify as particularly innovative or high-achieving students is very small. Those admitted would be well accommodated, making the program effective in providing for and integrating refugees on a small scale. Similar refugee interventions and resources, however, show that scalability remains a major limitation.³⁰ There is insufficient infrastructure to identify eligible students, and few refugees meet the admission criteria. Nonetheless, accessibility for educational refugee programs is increasing. A 2018 study indicates that virtual frameworks have helped connect more refugees to resources than ever before, suggesting a possible future infrastructure to link refugees with academic opportunities.³¹ Overall, while efficacy is high for a limited number of participants, scaling up would be much less effective, scoring the alternative at a 3.

Score: 3/5

Cost: From 1990 to 2022, the United States welcomed over 2.1 million refugees and accepted more than 800,000 asylees, during which their net fiscal impact was positive, totaling \$123.8 billion, meaning they contributed more in revenue than they required in government expenditures.³² The federal government's net benefit amounted to \$31.5 billion, while state and local governments benefited by \$92.3 billion.³³ During the same span, total government expenditures on refugees and asylees reached an estimated \$457.2 billion, with the federal government covering about 72.5% (\$331.5 billion) and state and local governments about 27.5% (\$125.7 billion), meanwhile, refugees and asylees contributed roughly \$581 billion in revenue to all levels of government, including \$363 billion to the federal government (through payroll, income, and excise taxes) and \$218 billion to state and local governments (through income, sales, and property taxes). Including spouses and children (most of whom are U.S. citizens), total expenditures rose to \$723.4 billion, while contributions reached \$739.4 billion.³⁴ On a per capita basis, refugees and asylees evidently had a fiscal impact comparable to the overall U.S. population.

For this specific program, costs include the Implementing Organization (I.O.) staff, pre-departure activities, U.S. cohort coordination, training for U.S. higher education institutions, on-campus learning (tuition, fees, room and board, books, etc.), and wraparound support (flights,

²⁹ UNHCR, "Out of Reach," *Stepping Up: Refugee Education in Crisis*, 2019, <https://www.unhcr.org/steppingup/tertiary-education-out-of-reach/>.

³⁰ Aniek Woodward et al., "Scaling Up Task-Sharing Psychological Interventions for Refugees in Jordan: A Qualitative Study on the Potential Barriers and Facilitators," *Health Policy and Planning* 38, no. 3 (January 12, 2023): 310–320, <https://doi.org/10.1093/heapol/czad003>.

³¹ Bernhard Streitwieser et al., "Access for Refugees Into Higher Education: A Review of Interventions in North America and Europe," *Journal of Studies in International Education* 23, no. 4 (December 2019): 473–502, <https://doi.org/10.1177/1028315318813201>.

³² Robin Ghertner, Suzanne Macartney and Meredith Dost, "The Fiscal Impact of Refugees and Asylees Over 15 Years: Over \$123 Billion in Net Benefit from 2005 to 2019," *Assistant Secretary for Planning and Evaluation Office of Human Services Policy*, <https://aspe.hhs.gov/sites/default/files/documents/3dd52e6be9abfa2b7462be0fb3a9c81f/aspe-brief-refugee-fiscal-impact-study.pdf>.

³³ *ibid.*

³⁴ *ibid.*

housing, technology, emergencies, stipends, etc.).³⁵ These costs will evolve as the program develops. In the first year, for a cohort of 30 students, I.O. expenses are estimated at \$1 million.³⁶ For a scaled version with around 150 students, I.O. costs would be about \$2.4 million annually, with potential economies of scale as participation grows.³⁷ Beyond I.O. costs, per-student expenses range from \$41,450 to \$103,100 for the first year and \$38,350 to \$98,400 for each subsequent year.³⁸ These variations reflect differences in tuition and living expenses at diverse institutions. The current budgetary cuts in foreign aid and federal fundings to higher education institutions from the US government has imposed more challenges for individual universities to implement such investment, thus it is scored 2.5.

Score: 2.5/5

Equity: With nearly 4,000 higher education institutions, the United States has the largest capacity to host international students.³⁹ In 2022–23, the top 100 institutions alone hosted 57% of all international students (Open Doors).⁴⁰ Several states—including Colorado, Minnesota, Oregon, Utah, Vermont, Virginia, and Wisconsin—have passed legislation allowing refugee students immediate access to in-state tuition at all public colleges and universities, bypassing typical residency requirements.⁴¹ In Iowa, Maine, and Ohio, state systems also grant refugees in-state tuition, and in California and Vermont, community colleges specifically extend in-state tuition to refugees.⁴² According to observation in most other states, refugees qualify for in-state tuition once they meet residency requirements. By welcoming more refugee students, U.S. higher education institutions further equity goals while also benefiting from refugees' comparable economic contributions.

Score: 3/5

Alternative #4- Creation of a New Refugee/Asylum Bureaucratic Office modeled after Canada and the UK.

Projected Outcomes

Political Feasibility: This policy alternative would impact the government, refugees, and private citizens. While it would likely be well-received by refugees and some members of the public, it may face resistance from an administration focused on cutting programs and reducing the size of government. Given the current emphasis on eliminating bureaucracy and defunding departments deemed inefficient, this proposal is not politically feasible. The creation of a new department—DODGE—would require a significant budget extension, which is unlikely under these conditions. Therefore, this alternative is scored 0.5 for political feasibility.

³⁵ Allan E. Goodman, and Mirka Martel, "Outlook 2030 Brief The U.S. and International Education," *Institute of International Education*, https://www.iie.org/wp-content/uploads/2024/03/IIE_Outlook-2030_March-2024-1.pdf.

³⁶ *ibid.*

³⁷ *ibid.*

³⁸ *ibid.*

³⁹ *ibid.*

⁴⁰ *ibid.*

⁴¹ Laura Wagner, "Expanding Refugee Access to In-State Tuition," *Higher Education Immigration Portal*, <https://www.higheredimmigrationportal.org/policy/expanding-refugee-access-to-in-state-tuition/>.

⁴² The Refugee Advocacy Lab, "Resource: In-State Tuition Tracker," <https://www.refugeeadvocacylab.org/resources/in-state-tuition-tracker>.

Score: 0.75/7.5

Efficacy: In terms of effectiveness, modeling this program after Canada's refugee system could yield strong results. Refugees would receive one year of financial assistance, or until they achieve financial independence, whichever comes first. The program would also include welcoming refugees at the airport or port of entry, securing temporary and then permanent housing, assessing needs, providing orientation to life in the host country, and offering referrals to federal, provincial, and settlement services. Since all of these services are provided within the first year, the program would be highly effective in supporting refugee integration and score a 4.

Score: 4/5

Cost: The proposed policy would reduce the financial burden on refugees by covering essential expenses such as medical examinations, legal assistance, translation services, and basic needs. However, on the government's end, implementing this policy would require substantial funding, likely sourced from the budgets of existing bureaucracies involved in refugee resettlement. Currently, at least eight different agencies are involved in the refugee process, though not all are exclusively dedicated to refugee affairs. These include the Department of State's Bureau of Population, Refugees, and Migration (PRM), which has a budget of approximately \$3.9 billion; the United Nations High Commissioner for Refugees (UNHCR), which receives international funding totaling around \$10.2 billion; and the Department of Homeland Security (DHS), which is divided into U.S. Citizenship and Immigration Services (USCIS), with a budget of \$6.8 billion, and Customs and Border Protection (CBP), though it remains unclear how much of its budget directly supports refugees. Additionally, the Department of Health and Human Services' Office of Refugee Resettlement (ORR) operates with a budget of approximately \$6 billion, while the International Organization for Migration (IOM) receives about \$3.5 billion from the United States. While precise budgetary allocations toward refugee efforts within some of these agencies are difficult to isolate, a rough estimate for the consolidated cost of creating a new refugee-serving bureaucracy would be approximately \$13.4 billion. This figure is tentative and likely underestimates the full cost, as not all departmental contributions to refugee-related functions are clearly defined or publicly reported.

Score: 2/5

Equity: The proposed bureaucracy would enhance equity by ensuring that all applicants are treated fairly. Refugees would apply and receive decisions in the order their applications are submitted, promoting transparency and consistency in the process. While implementation challenges remain, the foundational structure of the program would be equitable, scoring a 4.

Score: 4/5

Alternative #5- Government Labor Opportunity for Citizenship

Projected Outcomes

Political Feasibility: The current Executive administration is hostile toward immigration reform, allowing an increased number of refugees. This has been seen by recent executive orders, such as the following: an attempted abolishment of Birthright citizenship, rescinding the Biden administration's civil immigration enforcement priorities, a task force to reunify firmly

separated families, and barring entry to Asylum seekers from the southern border.⁴³ Such sentiment is amplified by both houses of Congress, who have rejected all comprehensive immigration reform in the following decades.⁴⁴ Most recently, the Republican Party, which controls both houses, denounced bipartisan solutions to immigration reform. Resultantly, there is a low possibility of reforming the bureaucracy for asylum seekers seeking employer sponsorship, therefore political feasibility being scored a 1.5

Score: 2.25/7.5

Efficacy: Roughly 11 million undocumented immigrants in the U.S. work in the shadow economy, facing low-wage and unstable jobs without legal protections.⁴⁵ This alternative would offer a legal path to stable employment by matching immigrants with jobs in key industries. Modeled after Canada's Express Entry and Germany's Skilled Immigration Act, it would prioritize skills, experience, and language proficiency through a clear, points-based system. Canada's Express Entry has been highly effective: 95% of applicants found work within a year, 83% in their trained fields, and many earned 20% more than non-Express Entry immigrants.⁴⁶ Germany's program helped bring in nearly 30,000 skilled workers in its first year, even during the pandemic.⁴⁷ A U.S. version would streamline the application process and offer support such as job training, credential recognition, and language courses, boosting job retention and financial independence. Tying residency and citizenship to work and community participation makes it a sustainable integration model. The goal would be to process applications within six months, further improving access and efficiency. This rating of a 4 is supported by the program's efficient processing goals, strong employment outcomes, and the proven success of similar international models.

Score: 4/5

Cost: Given that our program will be modeled after Canada's Express Entry Program, examining its finances and costs provides an accurate estimate for a US Workers Program. Canada's program is estimated to cost approximately \$76 million over five years for pre-arrival services and \$165 million over five years for settlement services.⁴⁸ This equates to a total expenditure of \$48.2 million on the implementation and functioning of the Express Entry Program, upon which the US system will be based.

⁴³New York City Bar. Trump Administration Changes to Immigration Law: Updated March 18, 2025. New York: New York City Bar Association, 2025.
https://www.nycbar.org/wp-content/uploads/2025/03/TrumpAdminChangesImmigrationLaw_Updated_3.18.2025.pdf.

⁴⁴Galston, William A. "The Collapse of Bipartisan Immigration Reform: A Guide for the Perplexed." Brookings Institution, February 8, 2024.

⁴⁵Passel, Jeffrey S., and Jens Manuel Krogstad. "What We Know About Unauthorized Immigrants Living in the U.S." Pew Research Center, July 22, 2024.
<https://www.pewresearch.org/short-reads/2024/07/22/what-we-know-about-unauthorized-immigrants-living-in-the-us/>.

⁴⁶Immigration, Refugees and Citizenship Canada. "Immigrant Outcomes." IRCC Minister Transition Binder 2019, June 11, 2020.

⁴⁷*ibid.*

⁴⁸Parliamentary Budget Officer. Costing the Express Entry Immigration Process. Ottawa: Office of the Parliamentary Budget Officer, March 7, 2023.

Once fully operational, the program will be self-sustaining, as the fees collected from each applicant will cover its associated costs. These fees include an \$850 application processing fee per individual and a \$515 Right of Permanent Residence Fee (RPRF) per adult. For spouses or partners, there is an \$850 processing fee plus the \$515 RPRF, totaling \$1,365, while each dependent child incurs a fee of \$230. On average, a family's total costs amount to approximately \$2,960. Given that nearly 226,000 families immigrate to the United States annually, such fee structures are expected to generate approximately \$668,960,000 in total annual revenue from the program.⁴⁹ This in turn, pays back for any implementation costs a new system may bring and leads to a score of 4.5.

Score: 4.5/5

Equity- This alternative model aims to provide equitable access to employment and education for immigrants by aligning their skills with labor market needs. However, lessons from Canada and Germany show that achieving equity remains a complex challenge. In Canada, while the Express Entry system has increased employment rates among immigrants, disparities persist. Children of immigrants, particularly those from refugee backgrounds, have lower university completion rates (32%) compared to their peers from economic immigrant families (54%). This indicates that, despite access to education, equitable outcomes are still unevenly experienced across immigrant communities.⁵⁰

Germany faces comparable challenges, with refugees experiencing mixed results. Reducing the waiting period for work eligibility has raised employment rates among refugees. For example, the employment rate for those who arrived in 2015 reached 68% eight years after arrival, with 76% in full-time positions.⁵¹ However, challenges persist, including credential recognition and language barriers, which continue to hinder full labor market integration. While structured immigration programs can improve access to opportunities, systemic barriers may continue to impede true equity. Addressing issues such as credential recognition, robust language support, and comprehensive integration services is essential to empower immigrants to compete on an equal footing with native-born citizens. This rating of a 2.5 reflects the program's potential to enhance equitable access to employment and education, with the understanding that significant challenges must be addressed to achieve truly equitable outcomes for refugees.

Score: 2.5/5

Confront the Tradeoffs

Alternative #1

Letting Present Trends Continue:

Though some of the existing structures of the refugee applicant processing system make this alternative costly, specifically the nuance of the application process, various forms of

⁴⁹Batalova, Jeanne, and Nicole Ward. "Frequently Requested Statistics on Immigrants and Immigration in the United States." Migration Policy Institute, March 14, 2023.

<https://www.migrationpolicy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states>.

⁵⁰InfoMigrants. "Germany: Employment of Refugees Eight Years After Their Arrival Reaches 68 Percent." May 11, 2023.

<https://www.infomigrants.net/en/post/56857/germany-employment-of-refugees-eight-years-after-their-arrival-reaches-68-percent>.

⁵¹*ibid.*

support during the resettlement process, and use of social welfare program by refugees, recent plans by the second Trump administration to slash federal funding for the offices processing these applications have made this status quo more affordable, though less effective. Politically, the administration is leaning toward more stringent measures to ban refugee admissions, with federal funding cuts and a current suspension of funding and processing refugees through the U.S. Refugee Admissions Program (USRAP) as of January 20th. Considering these recent changes, it is likely that current trends will continue. As the current Congress leans conservative on this issue, the current state of affairs is highly feasible. In terms of equity and efficiency of the refugee admissions process, however, this alternative consistently falls short - multi-year wait times have increased due to staffing cuts, asylum applicants face additional conditions limiting eligibility, and applicants are not provided with adequate resources to sustain themselves when integrated into the U.S. Despite these shortcomings, this remains the most feasible option, and we therefore recommend this policy, while acknowledging the significant areas in which it falls short.

Alternative #2

Increase Federal Staffing to Expedite Application Processing:

Increasing federal staffing for refugee assistance programs would improve both the efficacy of application processing and equity in refugee resettlement. By hiring more staff, the backlog of applications could be eliminated within five years at a projected cost of \$2 billion, and a greater number of refugees could be catered to on a more prompt and equitable basis.⁵² However, this alternative is hindered by its highly unlikely political feasibility and its high cost. Specifically, this proposal aims to increase staffing for the U.S. Refugee Resettlement Program, which has been halted by the current administration. Thus, increasing staffing to a paused program would likely face strong political resistance. Furthermore, the high cost to hire enough staff to clear the backlog of applications (estimated \$2 billion) would be difficult to justify in the current political climate. Overall, given these challenges, we do not recommend this alternative to improve refugee application processing and integration in the United States.

Alternative #3

Creation of US-Sponsored Student Programs for Student-Refugees/Asylum Seekers:

While creating more opportunities for student refugees to attain citizenship and visas to come to America is moderately effective and cost-efficient, at this current time, there is no political appetite for creating such a program. This program is very specific in the refugee groups it addresses, so the efficacy of this program at addressing the entirety of the issue is low. Under the current administration, more federal programs are being cut to save money, creating a hostile environment for any potential government spending. Further, current political sentiment towards refugees and asylum seekers, or immigrants in general, under the current administration has overall been negative, meaning that there is even less chance for the government to spare the budget for this program. Therefore, the cost of this program is not ideal for implementation. Looking at equity, this program is not equitable, as the resources and accessibility of this

⁵² Eileen Sullivan, "Asylum in America, by the Numbers," The New York Times, November 21, 2023, sec. U.S., <https://www.nytimes.com/2023/11/21/us/politics/migrant-crisis-border-asylum.html>.

program and other similar programs are mainly internet-based. This eliminates prospective refugee students who don't have access to the internet. This combination of factors would make this alternative unfeasible, and therefore, we do not recommend this policy alternative.

Alternative #4

Creation of a New Refugee/Asylum Bureaucratic Office modeled after Canada and the UK:

The creation of a new refugee/asylum bureaucratic office modeled after Canada is not a feasible option. Politically, it is unimaginable that it will be achieved at this time. The current administration has been downsizing the bureaucracy, making the creation of a new office at odds with that goal. Cost-wise, the budget required for a new office would also be at odds with the administration's goals of lowering government spending, even if it would just be rerouting funding from the existing six bureaucratic options. However, this option would be quite equitable, allowing for every refugee to be considered the same under the office. In addition, the efficacy would improve from what the status quo is. Yet, even with these benefits, it is not feasible due to the high political and monetary costs.

Alternative #5

Government Labor Opportunity for Citizenship:

The creation of a reformed government labor system, modeled after Canada's Express Entry system, would greatly alleviate governmental cost liability and implement a highly effective, mutually beneficial system for both refugees and the government. However, this alternative faces significant challenges in terms of equity and political feasibility. The program's potential efficacy is high as this system directly connects refugees to labor shortages through a structured, skill-based process. It has proved successful in other countries, leading to better employment opportunities and fostering integration. However, equity remains a concern, as this model may favor educated or skilled applicants. Without strong support systems, vulnerable populations could be excluded. Additionally, due to the current Administration's hostility to immigration reform, getting the support and funding for such a reform to be passed seems unfeasible.

Matrix Scoring Guide

Score	Meaning	Cumulative Score	Meaning
1	Low	1 - 6	Inadequate
2	Low-Moderate		
3	Moderate	7 - 13	Favorable
4	Moderate-High	14 - 22.5	Advisable
5+	High		

Matrix for Proposed Alternatives

	Political Feasibility (weighted 1.5x)	Efficacy	Cost	Equity	Total:
Status Quo	7.5	2	3	2	14.5/22.5
Alternative #2- Increase Federal Staffing to Expedite Application Processing	0.75	3	1	4	8.75/22.5
Alternative #3- Creating more Student Programs sponsored by the US to bring in students w/ student visas	2.25	3	3	2.5	10.75/22.5
Alternative #4- Creation of a New Refugee/Asylum Bureaucratic Office modeled after Canada and the UK.	0.75	4	2	4	10.75/22.5
Alternative #5- Government Labor Opportunity for Citizenship	2.25	4	4.5	2.5	13.25/22.5

Final Recommendation

After an assessment of all five alternatives, we recommend maintaining the current refugee-admissions framework (Status Quo) as the most politically viable path in the near term. Under this approach, the Departments of Homeland Security (DHS), Justice (DOJ), and State will continue to administer refugee processing and post-arrival support under existing statutory authority for 2025 and beyond. This option carries the lowest immediate fiscal burden, requiring no new appropriations, personnel expansions, or agency reorganization, and therefore avoids additional strain on the federal budget. Moreover, it aligns with the current Administration's restrictive immigration agenda, enjoys passive support from the Congress's conservative majority, and can be sustained with the agencies' present staffing and operating procedures. Resultantly, it was the highest-scoring alternative and the only option that reached a sufficiently high score (14.5) to be deemed viable.

By contrast, although the Labor-Based Express-Entry system, the creation of a unified refugee agency, the federal student-refugee pathway, and a surge in adjudicatory staffing each promise superior humanitarian and economic outcomes, all four demand either substantial new funding or enabling legislation unlikely to pass in today's political climate. Implementing any of them would therefore risk legislative gridlock and indefinite delays - leaving the existing two-million-case backlog unresolved.

While the Status Quo fails to remedy long wait times, fragmented services, and inequities, it remains the only alternative with a realistic chance of enactment in 2025. We recommend that federal agencies simultaneously pursue incremental, budget-neutral efficiencies, such as re-prioritizing adjudication dockets and reallocating existing grant funds, to mitigate humanitarian harms while political conditions evolve. Once a more supportive congressional and executive environment emerges, the higher-impact reforms evaluated in this memo should be revisited and advanced.

Work Cited

- American Immigration Council. "Beyond a Border Solution: How to Build a Humanitarian Protection System That Won't Break." Last modified May 3, 2023.
<https://www.americanimmigrationcouncil.org/research/beyond-border-solutions>.
- BBC News. "US Suspends Refugee Admissions and Tightens Asylum Rules." Last modified March 22, 2024. <https://www.bbc.com/news/articles/clyn2p8x2eyo>.
- Batalova, Jeanne, and Nicole Ward. "Frequently Requested Statistics on Immigrants and Immigration in the United States." Migration Policy Institute, March 14, 2023.
<https://www.migrationpolicy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states>.
- British Council Uganda. Canada Express Entry. Accessed March 4, 2025.
<https://www.britishcouncil.ug/exam/ielts/canada-express-entry>.
- Carnegie Endowment for International Peace. "Resistant to Reform? Improving U.S. Immigration Policy Through Data, Evidence, and Innovation." August 28, 2024.
<https://carnegieendowment.org/research/2024/08/united-states-immigration-reform-evidence>.
- Congressional Research Service. R47164: Title of the Report. Accessed March 4, 2025.
<https://crsreports.congress.gov/product/pdf/R/R47164>.
- Connors, Ishara Casellas, Lisa Unangst, and Kerri Evans. "Navigating the Tension: US Refugee Resettlement Agency Support of Postsecondary Access." *Journal of Refugee Studies*, feae086 (2025).
<https://doi.org/10.1093/jrs/feae086>.
- Council on Foreign Relations. "How Does the U.S. Refugee System Work." Last modified February 9, 2023.
<https://www.cfr.org/backgrounder/how-does-us-refugee-system-work-trump-biden-afghanistan>.
- Galston, William A. "The Collapse of Bipartisan Immigration Reform: A Guide for the Perplexed." Brookings Institution, February 8, 2024.
- Ghertner, Robin, Suzanne Macartney and Meredith Dost. "The Fiscal Impact of Refugees and Asylees Over 15 Years: Over \$123 Billion in Net Benefit from 2005 to 2019." Assistant Secretary for Planning and Evaluation Office of Human Services Policy.
<https://aspe.hhs.gov/sites/default/files/documents/3dd52e6be9abfa2b7462be0fb3a9c81f/aspe-brief-refugee-fiscal-impact-study.pdf>.

-
- Government of Canada. Blended Visa Office-Referred Program: About the Process. Accessed March 4, 2025. <https://www.canada.ca>.
- Harvard Immigration Initiative et al. Did You Know?. Presidents' Alliance on Higher Education and Immigration, April 2023. Accessed March 4, 2025. <https://www.presidentsalliance.org/wp-content/uploads/2023/04/FINAL-DID-YOU-KNOW-Harvard-Immigration-Initiative-et-al-2023.pdf>.
- Higher Ed Immigration Portal. U.S. Education Pathways for Refugee Students. Accessed March 3, 2025. <https://www.higheredimmigrationportal.org/policy/u-s-education-pathways-for-refugee-students/>.
- Immigration, Refugees and Citizenship Canada. "Immigrant Outcomes." IRCC Minister Transition Binder 2019, June 11, 2020.
- InfoMigrants. "Germany: Employment of Refugees Eight Years After Their Arrival Reaches 68 Percent." May 11, 2023. <https://www.infomigrants.net/en/post/56857/germany-employment-of-refugees-eight-years-after-their-arrival-reaches-68-percent>.
- Jamil, Hikmet, Samer S. Kanno, Rami Abo-Shasha, Mazen M. AlSaqa, Monty Fakhouri, and Bengt B. Arnetz. "Promoters and Barriers to Work: A Comparative Study of Refugees Versus Immigrants in the United States."
- The New Iraqi Journal of Medicine 8, no. 2 (2012): 19-28. Kreisberg, A. Nicole, Els de Graauw, and Shannon Gleeson. "Explaining Refugee Employment Declines: Structural Shortcomings in Federal Resettlement Support." *Social Problems* 71, no. 1 (2024): 271-90. <https://doi.org/10.1093/socpro/spab080>.
- Lerner, Amy B. "The Educational Resettlement of Refugee Children: Examining Several Theoretical Approaches." *Multicultural Education* 20, no. 1 (2012): 9-14.
- McBrien, J. L. "Educational Needs and Barriers for Refugee Students in the United States: A Review of the Literature." *Review of Educational Research* 75, no. 3 (2005): 329-64. <https://doi.org/10.3102/00346543075003329>.
- New York City Bar. Trump Administration Changes to Immigration Law: Updated March 18, 2025. New York: New York City Bar Association, 2025. https://www.nycbar.org/wp-content/uploads/2025/03/TrumpAdminChangesImmigrationLaw_Updated_3.18.2025.pdf.