

July 6, 2026

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

RE: Rescind *Policy Memorandum PM-602-0199* Restricting Access to Adjustment of Status

Dear Director Edlow:

We, the undersigned organizations, write to express our deep concern regarding *U.S. Citizenship and Immigration Services (USCIS) Policy Memorandum PM-602-0199*, “Adjustment of Status is a Matter of Discretion and Administrative Grace, and an Extraordinary Relief that Permits Applicants to Dispense with the Ordinary Consular Visa Process,” issued on May 21, 2026. We urge USCIS to immediately rescind this memorandum and reaffirm adjustment of status (AOS) as a critical and Congressionally authorized pathway for eligible immigrants seeking lawful permanent residence from within the United States.

For more than 70 years, AOS has served as a foundational component of the U.S. immigration system. In establishing this pathway, Congress recognized the need to allow eligible immigrants already present in the United States to obtain green cards without the unnecessary disruption and prolonged family separation that accompany departing for consular processing in their countries of origin. The memorandum’s framing of adjustment of status as an “extraordinary” form of relief undermines Congress’s intent as well as the plain statutory meaning of the Immigration and Nationality Act. In addition, the memorandum drastically departs from longstanding agency practice. Although adjustment of status has always involved discretionary agency review, this memorandum’s misguided interpretation of AOS as an exceptional recourse disregards decades of policy. In fact, since 1980, over half of all legal permanent residents adjusted status within the United States, including nearly 800,000 individuals in Fiscal Year 2024 alone.

This memorandum is not only legally flawed but also leaves open many questions about the implementation and scope of this policy change. Subsequent statements from administration officials have only created further confusion, heightening the fear and uncertainty already facing millions of immigrants and their families.

What is abundantly clear is that the consequences of this memorandum will be severe and far-reaching. Broadly read, this memorandum appears to apply to all adjustments that take place under section 245(a) of the Immigration and Nationality Act, including most family-based and employment-based AOS applications. And while USCIS has indicated to the media that AOS will remain unchanged for certain applicants who “provide an economic benefit or otherwise are in the national interest,” we worry that the administration believes it can discriminatorily select who deserves access to the regular processes of our immigration system in violation of long-held American principles of equal protection under the law.

The memorandum appears to establish consular processing abroad as the preferred avenue for obtaining permanent residence. Yet consular processing often proves vexing and cumbersome, frequently taking months, if not years. A substantial expansion of immigrant visa processing for the Department of State will only exacerbate existing consular processing delays and disarray. As a result, if applicants are effectively pushed toward overseas consular processing, families will inevitably face prolonged separation. Applicants will also risk employment disruption, loss of employment authorization, and exposure to reentry bars.

Moreover, certain individuals will likely be disproportionately affected by this upheaval of long-settled policy, including but not limited to:

- Populations who have historically relied heavily on family-based immigration pathways, including Asian American and Pacific Islander communities, who, in recent years, have made up between 25 and 42 percent of all adjustments;
- Undocumented individuals, including many from communities of color, who have previously been able to utilize AOS in certain circumstances;
- Individuals seeking adjustment who were previously paroled into the U.S., such as Afghan and Ukrainian parolees and DACA recipients who previously traveled on advance parole;
- Applicants who cannot safely or realistically pursue immigrant visas abroad, especially those from countries with limited consular capacity, political instability, ongoing conflict, or discriminatory conditions.

Adjustment of status has long served as a critical mechanism for promoting family unity and stability within the United States immigration system, and was specifically established to allow families to remain together during the application process. Rather than creating new and unwarranted obstacles for immigrants, USCIS should prioritize fair, transparent, and efficient adjustment of status adjudications consistent with Congressional intent. Policies that undermine access to this pathway threaten families, communities, and faith in our immigration system. Furthermore, we are concerned about how this change, alongside many other shifts in immigration policy, reflects a concerted effort to quietly eliminate most forms of immigration to the U.S. This broad attack on existing immigration pathways is deeply harmful to our country and violates both the letter and spirit of our immigration laws.

We urge USCIS to immediately rescind Policy Memorandum PM-602-0199, roll back other changes that have unnecessarily hindered immigration to the U.S., and reaffirm that adjustment of status remains a viable and accessible pathway for permanent residency.

Sincerely,

### **National Organizations**

Value Our Families Coalition

#AfghanEvac

African Communities Together (ACT)

American Friends Service Committee (AFSC)

Asian Americans Advancing Justice | AAJC

Asian Americans/Pacific Islanders in Philanthropy (AAPIP)

Center for Gender & Refugee Studies

Church World Service

Empowering Pacific Islander Communities (EPIC)  
Freedom Network USA  
Haitian Bridge Alliance  
Immigrant Legal Resource Center  
Immigrants Rising  
Labor Council for Latin American Advancement (LCLAA)  
Lawyers for Good Government  
League of Women Voters of the United States  
National Asian Pacific American Women's Forum  
National Council of Asian Pacific Americans (NCAPA)  
National Education Association  
National Korean American Service and Education Consortium  
National Partnership for New Americans  
Nigerian Center  
Presidents' Alliance on Higher Education and Immigration  
Sikh American Legal Defense and Education Fund (SALDEF)  
South Asian SOAR  
Southeast Asia Resource Action Center (SEARAC)  
Stop AAPI Hate  
T'ruah: The Rabbinic Call for Human Rights  
The Sikh Coalition  
The Workers Circle  
UnidosUS  
United We Dream Network  
USAHello

### **Regional, State, and Local Organizations**

AAVEd  
Alliance of Filipinos for Immigrant Rights and Empowerment (FIRE)  
American Nurses Association\California  
APANO  
APANO Action Fund  
Asian Americans Advancing Justice | Atlanta  
Asian Americans Advancing Justice | Chicago  
Asian Americans Advancing Justice Southern California (AJSOCAL)  
Asian American Advocacy Fund  
Asian American Resource Workshop (AARW)  
Asian Law Alliance  
Ayuda  
California Coverage & Health Initiatives  
California Immigration Project  
California Latinas for Reproductive Justice  
CASL  
Central American Resource Center - CARECEN of Northern California  
Children's Defense Fund-Texas  
Chinese for Affirmative Action  
Coalicion de Lideres Latinos-CLILA  
Coalition for a Better Chinese American Community  
Coalition for Humane Immigrant Rights (CHIRLA)  
Courage California

Dignidad inmigrante en Athens  
East Bay Sanctuary Covenant  
Elena's Light  
Equality California  
Georgia Muslim Voter Project  
Hamdard Health Alliance  
HANA Center  
Hanul Family Alliance  
Illinois Coalition for Immigrant and Refugee Rights  
Immigrant Defenders Law Center (ImmDef)  
Indo-American Center  
JACL Chicago  
Jakara Movement  
KAN-WIN  
Khmer Anti-deportation Advocacy Group (KhAAG)  
Lutheran Social Services of the National Capital Area (LSSNCA)  
Massachusetts Immigrant and Refugee Advocacy Coalition  
Multi-Ethnic Collaborative of Community Agencies  
Oasis Legal Services  
Rising Voices  
Rizal Center  
Services, Immigrant Rights and Education Network (SIREN)  
Silver State Equality  
South Asian Network  
Sur Legal Collaborative  
U-Lead Athens  
Women Working Together USA