

Q&A for USCIS Policy Memorandum PM-602-0194

Introduction

As of January 1, 2026, USCIS has issued [Policy Memorandum PM-602-0194](#) with guidance stating that USCIS will place a “hold” on all benefit applications, such as Optional Practical Training (OPT), STEM OPT, change of status or adjustment of status, for applicants of certain countries of birth or citizenship while it conducts a more comprehensive screening review of the application as well as reviews and updates its institutional screening policies for applicants of these countries.

Below please find answers to common questions for F-1 students regarding this policy memo guidance. If you have additional questions, we encourage you to meet with an ISSS advisor for an advising appointment or come to the Drop-in Advising hours to further discuss your concerns. You may also email ISSS at: iss@newschool.edu.

Q&A

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What are the Countries of Citizenship or Birth impacted by this benefit applications hold?

This policy states that an applicant who is born in or holds citizenship of the countries affected by the previous Presidential Proclamations [PP 10949](#) and [PP 10998](#) is subject to the policy memorandum. These countries include:

Afghanistan, Angola, Antigua and Barbuda, Benin, Burkina Faso, Burma, Burundi, Chad, Republic of the Congo, Cote d'Ivoire, Cuba, Dominica, Equatorial Guinea, Eritrea, Gabon, Gambia, Haiti, Iran, Laos, Libya, Malawi, Mali, Mauritania, Niger, Nigeria, Palestinian Territories, Senegal, Sierra Leone, Somalia, Sudan, South Sudan, Syria, Tanzania, Togo, Tonga, Turkmenistan, Venezuela, Yemen, Zambia, Zimbabwe

I have dual citizenship in one of the countries listed, but my F-1 status is connected to a citizenship not listed. Am I still impacted by this policy guidance?

The policy guidance does not mention an exception for dual citizens at this time. Dual citizens may therefore still be impacted until it is confirmed otherwise.

Does this mean I am ineligible for OPT or STEM OPT if I was born or hold citizenship in one of the listed countries?

No. Eligibility requirements for non-immigrant/immigrant benefits of F-1 status are unchanged. F-1 students who have maintained status and are otherwise eligible for OPT or STEM OPT employment authorization may still apply within the appropriate application window and properly file the application.

How does this policy memorandum impact an application for OPT or STEM OPT for an F-1 student who was born or holds citizenship in one of the listed countries?

The policy guidance states that processing of an OPT or STEM OPT application is allowed to continue but final adjudication (i.e. an outcome decision of approval or denial) will be held during the additional screening process and USCIS review of screening policies. There is currently no guidance as to how long review may take, the duration that this policy guidance may be in effect, or how additional screening may be applied in all cases. The policy memo guidance states that additional measures of screening may be applied on a case-by-case basis.

What should I expect during processing if I apply for OPT or STEM OPT?

Students who are born in or citizens of one of the listed countries above may experience delays beyond normal USCIS processing times in receiving an outcome due to the hold of their application and may face additional screening measures or other evidence requests while an application is pending with USCIS, including delayed issuance of EAD cards. Issuance of a final adjudication decision of an application (ex. a decision of approval) may also be held on pause while USCIS completes its further reviews under the policy guidance.

Is there anything I can do when filing the application to avoid delays or additional screening?

Instructions for how to file an application for OPT and STEM OPT remain unchanged. If you will apply, make sure to follow all instructions to properly file your application in order to avoid common application errors and issues. Please review the [ISSS OPT page](#) and [ISSS STEM OPT page](#) for more detailed information on how to file your application.

If my application is delayed in processing, what can I do?

The average historical processing time by USCIS for OPT and STEM OPT applications is 3 to 4 months but may be longer. If your application is still pending processing after the normal processing time, you may [contact USCIS](#) or use [USCIS case inquiry tools](#) to inquire about the status of your application. Please make sure to review your [MyUSCIS account](#) for any updates, instructions, requests, or other notices from USCIS regarding your application that you may need to respond to. ISSS will not be able to determine if your application is delayed in processing or facing additional scrutiny specifically due to the policy memo guidance.

If I apply for Premium Processing service to USCIS, will this prevent processing delays?

Premium Processing service is a service by USCIS that provides for an application to be processed within 30 business days (around 6 weeks) from requesting the service. The policy memo does not make any exception for applications filed with Premium Processing. It is assumed, therefore, that applications for premium processing may be subject to the same “hold” on final adjudication under the policy guidance, and if the application becomes subject, notice of the outcome of processing of the application may take longer than 30 business days.

I was not born or hold citizenship in one of the listed countries. Will my application for OPT or STEM OPT be impacted?

No announcement of any changes to processing has been issued for applicants who are not born or holding citizenship in the countries listed. It is not known, however, if implementation of this policy guidance may influence or have any other effect on normal processing of other application cases not directly subject to the policy guidance.

Can I engage in employment on OPT or STEM OPT while application is processing if it becomes delayed?

F-1 students are only allowed to engage in employment if they have valid authorization to work in the U.S. (ex. OPT, STEM OPT). Applicants for Post-Completion OPT are not eligible to begin working until the OPT application is approved by USCIS and they have received their EAD card. F-1 regulations allow an applicant for the STEM OPT extension to continue working in qualifying STEM OPT employment for up to 180 days after the Post-Completion OPT authorization end date but then must pause working if their application is still pending.

If I am applying for Post-Completion OPT and my application is still pending after my I-20 program end date or after the 60 day grace period following my I-20 end date, do I have to depart the U.S.?

F-1 student status in the U.S. continues for the duration of status, meaning that status continues for as long as a properly filed OPT application is pending with USCIS.

If I am applying for STEM OPT and my application is still pending 180 days after my original Post-Completion OPT end date, do I have to depart the U.S.?

F-1 student status in the U.S. continues for the duration of status, meaning that status continues for as long as a properly filed STEM OPT application is pending with USCIS. However, students with a pending STEM application must stop working if their application is pending more than 180 days.

Am I permitted to travel outside the U.S. while my OPT application is pending?

There are significant risks to traveling while an OPT application is pending. Please see the [ISSS High-risk Travel Periods page](#) for more details. ISSS strongly advises against traveling after a student's I-20 program end date or Post-Completion OPT end date while an application is pending with USCIS. Please also review the [ISSS Immigration News page](#) regarding travel alerts and current travel and visa issuance bans. For students holding citizenship in the countries listed in the policy memo, if you depart the U.S., the Presidential Proclamations [PP 10949](#) and [PP 10998](#) may cause further difficulties for your re-entry or prevent renewal of your F-1 visa to be eligible to return to the U.S. as an F-1 student. If you anticipate any need to travel outside the U.S. while your application is pending, please first meet with an ISSS advisor to further discuss risks of travel on your application and your F-1 status.

What if I have additional questions?

If you have additional questions, we encourage you to meet with an ISSS advisor for an advising appointment or come to the Drop-in Advising hours to further discuss your concerns.

Current students may use [Starfish](#) on my.newschool.edu to schedule appointments. If you are on OPT or need appointment scheduling assistance, please call 212-229-5592 during ISSS Phone Hours to set up an appointment.

You can also attend our virtual drop-in hours via Zoom on Tuesdays and in person on Thursdays at the hours noted below. The link to join the Zoom Drop-in Hours can be found on the [ISSS website](#). No appointment is needed to participate in the Drop-in Advising Hours.