November 11, 2026

Submitted via www.regulations.gov

To: U.S. Citizenship and Immigration Services (USCIS)
Attention: The Honorable Markwayne Mullin, Secretary of Homeland Security
Re: Public Comment Opposing the October 14, 2026 Interim Final Rule on Termination of Refugee Status

The Refugee Action Coalition of Colorado, including founding member Spring Institute for Intercultural Learning, **staunchly opposes the October 14, 2026 interim final rule (IFR) that slashes the time refugees have to respond to a Notice of Intent to Terminate their status from 30 days to just 10 days**. This change unfairly targets refugees, erodes fundamental procedural protections, and imposes an unreasonable burden on people whose safety, livelihoods, and futures are at stake. Refugees undergo rigorous, multi-agency security screenings, interviews, and eligibility determinations before admission to the United States. Many have already endured persecution, violence, and displacement. Once resettled, they work to rebuild their lives, support their families, and contribute to our communities. **They deserve stability and fair treatment, not arbitrary new threats to their legal status.**

The administration's efforts to target, intimidate, and instill uncertainty and fear in our refugee neighbors are morally reprehensible and raise serious legal and procedural concerns. **These actions undermine more than four decades of U.S. commitments to refugee protection and resettlement.** They also threaten the well-being of Colorado communities, where refugees raise families, fill critical workforce roles, pay taxes, and make invaluable economic and civic contributions.

Although USCIS cites national security, public safety, and fraud prevention as justifications for the rule, **it fails to demonstrate why these interests require a nationwide reduction in refugees' opportunity to defend their status**. Instead, we see this change as part of a broader pattern of policies that restrict refugee protections, undermine resettlement, and create uncertainty for people who have already been admitted to the United States. The administration has continued to close America's doors to refugees around the world while arbitrarily prioritizing admissions for politically favored groups, primarily Afrikaners from South Africa, at the expense of equitable access for refugees facing persecution and displacement elsewhere. Its Fiscal Year 2027 Presidential Determination sets an extraordinarily low refugee admissions ceiling of 17,500, with admissions primarily allocated to Afrikaners, while the broader suspension of the U.S. Refugee Admissions Program remains in effect subject to limited exceptions. At the same time, refugees already admitted to the United States are enduring heightened scrutiny and re-vetting, with some potentially facing detention or removal, while new restrictions threaten their access to healthcare and other critical supports in the communities they now call home.

These policies have devastating consequences: families remain separated, individuals who supported U.S. missions abroad remain in danger, and vulnerable refugees remain stranded without a viable path to safety. For those who have already made it to the United States, the growing threat of losing their status undermines the security and stability that resettlement is meant to provide.

USCIS bases its justification for this change in part on a preliminary review of a subset of refugee cases in Minnesota, yet fails to adequately demonstrate why those findings warrant a universal, nationwide reduction in the response period. The agency also underestimates the real-world consequences of this change. **Ten days is simply not enough time for many refugees to understand the allegations against them, secure legal representation, determine how best to respond, and gather supporting evidence**. Although the rule allows refugees to request an interview rather than submit a complete written response within that period, making an informed decision about how to defend one's status still requires time, guidance, and meaningful access to legal assistance. Refugees may also need to obtain records from overseas and arrange translations or interpretation. **These are not minor administrative hurdles; they are essential steps in ensuring a fair process** when a person's legal status, livelihood, and future in the United States are at stake.

Critically, there is no administrative appeal under USCIS regulations for a decision to terminate refugee status, making the notice and response period an essential safeguard against wrongful termination. The rule itself acknowledges that a shorter timeframe may increase the difficulty and costs of gathering evidence and preparing a response. By severely limiting refugees' ability to respond, the rule risks unjust outcomes that could separate families, disrupt employment, and destabilize lives and communities. **Termination of refugee status also results in the loss of employment authorization associated with that status**, potentially depriving families of their livelihoods and disrupting the employers and communities that depend on their contributions. It may also expose individuals to removal proceedings. The rule places additional burdens on legal service providers and community organizations already working to help refugees navigate an increasingly hostile policy environment.

For more than four decades, the United States has maintained a moral and legal commitment to protecting refugees and providing a fair opportunity to seek safety. **That commitment must not be discarded through rushed procedures and inadequately justified policy changes.** The Refugee Act of 1980 established a framework for humanitarian protection and resettlement that has strengthened communities across our country. Colorado communities remain committed to welcoming refugees and recognizing their invaluable contributions.

The Refugee Action Coalition of Colorado condemns this rule and calls on the administration to rescind the interim final rule, restore the 30-day response period, and halt unnecessary re-vetting of refugees who have already undergone extensive screening. We urge the administration to uphold meaningful procedural protections and honor the nation's longstanding commitment to refugee welcoming and protection. **We also call on Congress to exercise its oversight authority, defend the integrity of our refugee protection system, and ensure that refugees who have sought safety in the United States are treated with fairness, dignity, and respect.** This includes pressing USCIS to resume timely processing of eligible refugees' applications for lawful permanent residence, so individuals and families can move forward with their lives without unnecessary delays and uncertainty.

Thank you for the opportunity to comment on this important matter.

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on behalf of Refugee Action Coalition of Colorado