

Curtis Ried  
Chief of Staff, National Security Council

Julieta Noyes  
Assistant Secretary of State for Population, Refugees, and Migration

Mara Tekach  
Coordinator for Afghan Relocation Efforts

Ur Jaddou  
Director of United States Citizenship and Immigration Services

December 1, 2023

**Re: Recommendations for Improving USRAP Processing for Afghans**

Dear Mr. Ried, Assistant Secretary Noyes, Coordinator Tekach, and Director Jaddou,

On behalf of 64 undersigned Afghan American community organizations, veterans' groups, refugee advocates, human rights monitors, humanitarian organizations, and others we write to share our concerns about the slow pace of resettlement facing Afghans referred to the U.S. Refugee Admissions Program (USRAP) through the Priority 1 (P-1) and Priority 2 (P-2) pathways. Afghan P-1 and especially P-2 referral pathways largely exist in name only and provide no short-term or functional pathway to safety. Over two years after the conclusion of the non-combatant evacuation operation (NEO) and Operation Allies Refuge (OAR) in Afghanistan, these pathways have not provided expedient or meaningful avenues of protection for the tens of thousands of Afghans referred to them. Our concerns have only been reinforced by the Pakistani government's recent enacting of their plan to [forcibly return thousands of Afghans to Afghanistan](#), a move that puts their lives at grave risk.

Afghans referred to USRAP in Afghanistan face enormous challenges fleeing the ongoing human rights and humanitarian crises in Afghanistan, and those awaiting processing in third countries often languish where they are personally vulnerable and have limited access to international protections. We believe that there are a number of policy options immediately available to the Biden Administration that could alleviate the ongoing challenges Afghans face in seeking safety through USRAP, and provide our constructive suggestions in this letter. The United States is capable of and must do more to bring these vulnerable Afghans to safety.

The U.S. government's pledge to create a pathway for Afghans has become a lifeline to which many desperate people are clinging. In the two years since the [2021 announcement of the P-2 program](#) for certain Afghans to complement existing P-1 referrals, international and Afghan rights monitors have continuously [documented](#) the Taliban engaging in a pattern of retaliatory abuses, including the arrest, jailing, torture, and killing of individuals suspected of opposing their rule. Concurrently, a series of discriminatory policies, edicts, and directives have [functionally shut Afghanistan's women and girls out of participation in public life](#), curtailed their access to education, and placed grave restrictions on their basic freedoms. Persecution of Afghans is also the order of the day for the hundreds of thousands who are waiting in [Iran](#) and [Pakistan](#), either without recourse, or with extremely limited access, to U.S. government processing facilities.

In practice, the USRAP P-1 and P-2 processes do not constitute a viable pathway for the volume of persecuted Afghans who seek safety in the U.S. from these very real threats. These processes have regularly failed to meet publicly shared timelines—the Department of State originally

estimated [12-14 months](#) to complete the refugee process for P-1 and P-2 adjudication, and subsequently revised that expectation to [12-18 months](#). Our advocacy community has yet to see appreciable Afghan refugee arrivals in the 26 months since the program's announcement.

We recognize that Afghan refugee resettlement is a complex, multi-faceted, and difficult task. Still, we believe Biden Administration officials should devote additional capacity to creatively leverage existing legal authorities, administration's funds, diplomatic relations, and processing changes that would meaningfully speed USRAP processing times for Afghan refugees. Including through:

A. *Investments in USRAP*

- **Explore expanding remote processing capacity for Afghan USRAP referrals in remote areas:** The Biden Administration should leverage more telecommunications technology to screen and review Afghan USRAP referrals where possible, in lieu of in-person Resettlement Support Center and USCIS interviews for those in remote or hard-to-reach areas. Remote processing is one step toward a solution with established precedent and practice by the U.S. and its partners. President Biden's [EO14013](#) already explicitly granted the U.S. Departments of Homeland Security and State necessary authorities to use video and audio teleconferencing to conduct refugee screenings and the Department of State has already [reported to Congress](#) and interagency partners that it would be leveraging video technology to facilitate interviews. Furthermore, UNHCR [relies on virtual or remote processing](#) to conduct refugee status determinations in some areas. The administration should consider utilizing innovative processing capacity to support P-3 family reunification referrals and follow-to-join applicants, not only P-1 or P-2 referrals.
- **Continue to dedicate attention to Afghan refugees in areas of specific concern, including but not limited to:**
  - **In Pakistan:** We remain deeply concerned that there still is no fully operational Resettlement Support Center (RSC) capacity in Pakistan and no alternative regional options. As of July 2023, [an estimated 20,000 Afghans in Pakistan await refugee processing](#). In October 2023 Pakistani officials announced plans to detain and expel thousands of Afghans from the country, and as of November 1 have begun [forcibly returning thousands to Afghanistan](#). U.S. officials must press the Government of Pakistan to enable Afghans in Pakistan to live with dignity and free from the fear of deportation to Afghanistan where they face persecution by the Taliban. The U.S. government should also increase available diplomatic pressure and resources to press Pakistan to permit operating an RSC (in-person or virtual) and facilitate the entry, stay, and exit of Afghans in search of safety. The U.S. should also make it clear to Pakistani authorities that they should not be extorting visa and exit fees from this vulnerable population. We also encourage considering additional regional RSC models to serve Afghan refugees as well as other regional refugee populations. Ultimately, the U.S. government should negotiate other locations beyond Doha where there are diplomatic ties and needed infrastructure to process more categories of Afghans in need of refugee processing and permanent protection.
  - **In Iran:** We understand that Afghans referred to USRAP have been informed by the U.S. government that Iran is one of only a handful of countries where case processing is not feasible. However, Iran remains one of the primary destinations for Afghans fleeing persecution – per UNHCR nearly [85 percent of all registered Afghan refugees in the world are registered in Iran and Pakistan alone](#). Advocates consistently report working with Afghans in Iran who have been referred to the P-1 and P-2 programs and had their initial referrals accepted by PRM, but have no further options for processing while they remain in the country. While the U.S. does

not maintain a diplomatic or consular relationship with Iran, we encourage the U.S. government to pursue avenues to leverage the diplomatic presence of a U.S. ally in Iran to facilitate visa issuance and allow Afghan USRAP referees to move to a country where they would be able to continue processing. We understand from efforts like the Lautenberg Program that this is not an easy path forward for the U.S. government, and that establishing this sort of processing model would require complex and delicate multilateral negotiations, but is worth exploring to provide additional relief in the region for at-risk Afghans who supported the U.S.

- **Surge resources to USRAP infrastructure:** The challenges that Afghans in the USRAP pipeline face reflect broader systemic delays within USRAP, where refugees wait an average of 4 years from referral to resettlement, and some have been stuck in the pipeline for over 10 years. While great strides have been made to expand the U.S. capacity to resettle refugees since August 2021, the U.S. resettlement infrastructure—both overseas and in the United States—requires additional support to accommodate an increase in arrivals from around the world. We commend the administration’s efforts to increase refugee arrivals and urge federal agencies to collaborate to further streamline and stabilize arrivals across all nationalities - and make the necessary policy, program, and funding improvements to domestic capacity to equip resettlement sites to manage higher volumes of arrivals with unique and acute needs. At a time when costs for housing, legal representation, and mental health access, among other needs, are especially pronounced, the administration must not consider any solution in a vacuum. At the same time, the administration should not slow or undermine USRAP processing in other regions to scale up Afghan processing. The administration and Congress should ensure existing and supplemental resources are provided for the [Bureau of Population, Refugees, and Migration](#) (DOS/PRM), the [Office of Refugee Resettlement](#) (HHS/ORR), and [U.S. Citizenship and Immigration Services](#) (DHS/USCIS).

#### B. *Access to Enduring Welcome*

- **Make Afghan P-1 and P-2 referrals eligible for U.S. relocation support through Enduring Welcome:** The ongoing relocation efforts the administration has undertaken in order to assist certain SIV applicants and others demonstrates what is possible with partnership, concerted effort, and prioritization. We strongly urge allowing Afghans who have an accepted USRAP referral but have not yet relocated to a 3rd country access to these ongoing relocation efforts from Afghanistan. We have heard commitments from this administration to allow the “most-at-risk” USRAP referrals to access relocation support, but have yet to see this in practice. It is equally important that the administration expand meaningful reunification for loved ones like siblings, parents - and grandparents in the case of Unaccompanied Afghan Minors (UAMs) and Attached Afghan Minors (AAMs). Right now, family reunification is extremely limited, and many UAMs and AAMs are unable to be reunited with their parents and guardians. Recognizing the challenges in expanding eligibility for manifests, it is imperative the U.S. government does not desert those who can support community wholeness here in the United States. Combining relocation manifest eligibility with additional locations beyond CAS/Doha, and creating a plan to allow discrete and safe remote processing, would allow for Afghan refugees to complete their initial screenings virtually in-country, and give them access to biometrics and other in-person services they are unable to access in Kabul due to the lack of U.S. consular presence in the country.
- **Ensure third-country processing platforms have the capacity for expedited refugee processing and expand the number of sites for Afghan relocation:** We understand that

Camp As Sayliyah (CAS) currently serves as a site for concurrent refugee processing, and have been grateful to see concurrent and/or expedited processing roll out for other refugee populations and encourage that this model be replicated in Tirana, Albania as well. We also urge the U.S. government to increase the number of refugee processing platforms for Afghans to scale up relocation efforts. Given the ongoing difficulties with consistent flights from Afghanistan to these processing platforms, the U.S. should also look to expand relocation efforts from neighboring Pakistan or other 3rd countries as well.

C. *Ongoing Engagement & Information Sharing*

- **Provide regular, detailed, and disaggregated data on the Afghan USRAP adjudications, broken down by referral pathways:** Civil society organizations remain in close contact with Afghans seeking relocation from Afghanistan and surrounding countries, many of whom were their trusted co-workers. This has been especially true for Afghans referred to USRAP, who have relied on civil society for guidance due to extremely limited and inconsistent communication from the U.S. government on their individual cases and the broader program. We particularly request regular updates on the Afghan P-1/P-2 pipeline, particularly the number of cases at each processing stage, including referrals, approvals, denials, pending cases, and admissions data disaggregated by pathway (e.g. P-1, P-2, P3). Information should be updated frequently and disaggregated by the applicant's gender and country of residence if possible.

Refugees are often the most at risk, and the most in need of safety, protection, aid, and relocation. Afghans referred to the USRAP meet this principle, and deserve the same consideration as other groups. While the administration has taken important steps, more can and should urgently be done. Making refugee resettlement a priority sends the strong message that the United States will not abandon those who stand up for a freer, more democratic world. Conversely, failing to make refugee resettlement of Afghans a reality will have a chilling effect on potential future civil society allies throughout the world. It is not too late to take further action, and we urge the administration to do so.

We request a meeting to convey our urgent and ongoing concerns about delays in USRAP processing and recommendations to ensure our Afghan allies have expedient and meaningful access to permanent protection. Please contact Jill Marie Bussey at Lutheran Immigration and Refugee Service at [jbussey@lirs.org](mailto:jbussey@lirs.org) and Amie Kashon at Human Right First at [KashonA@humanrightsfirst.org](mailto:KashonA@humanrightsfirst.org) to coordinate engagement and for any questions or concerns. We look forward to your response and working together to seek these solutions.

Sincerely,

#AfghanEvac

Afghan American Community Organization  
Afghan American Cultural Center  
Afghan Evacuation and Resettlement Lawyers (AERL)  
Afghan Refugee Relief  
Afghan-American Foundation  
Afghanistan Advocacy Group  
Afghans For A Better Tomorrow  
Allied Shepherd  
Amnesty International USA  
Ansar of Pittsburgh  
Association of Wartime Allies  
Catholic Community Services of Lane County  
Center for Empowering Refugees and Immigrants

Center for Victims of Torture  
Central American Refugee Center (CARECEN NY)  
Church World Service  
Committee to Protect Journalists  
Community Supported Film  
Conklin Immigration Law LLC  
CRIS - Community Refugee & Immigration Services  
Dorcas International Institute of RI  
Freedom House  
Ghafoor Foundation  
Hearts & Homes for Refugees  
HIAS  
Human Rights First  
Immigrant Defenders Law Center  
International Civil Society Action Network (ICAN)  
International Institute of Los Angeles  
International Institute of New England  
International Refugee Assistance Project (IRAP)  
International Rescue Committee  
Jesuit Refugee Service/USA  
Jewish Vocational Service of Kansas City  
Khanbabai Immigration Law  
Kids in Need of Defense (KIND)  
Law Office of Spojmie Nasiri, PC  
Lutheran Immigration and Refugee Service  
MADRE  
Mina's List  
Momand Foundation dba Lifting Humanity  
Mujadidi Foundation  
National Immigration Forum  
No One Left Behind  
Nooristan Foundation  
Paloonkey  
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Refugee Congress  
Refugee Council USA  
Santa Cruz Welcoming Network  
The Advocates for Human Rights  
The International Institute of Metropolitan Saint Louis  
The Lamia Afghan Foundation  
Truman Center for National Policy  
U.S. Committee for Refugees and Immigrants  
Uplift Afghanistan Fund  
USCRI  
We Are All America (WAAA)  
Women for Afghan Women  
World Hazara Council USA  
World Relief