



### *Executive Summary*

## **The First 100 Days of the Second Trump Administration: Key Immigration-Related Actions and Developments**

The second Trump administration has implemented sweeping changes to the U.S. immigration system during its first 100 days, fundamentally reshaping border security, enforcement priorities, humanitarian pathways, and legal immigration processes. While enforcement and restriction have dominated, the administration has floated a handful of pro-immigration proposals, including a “[Gold Card](#)” for wealthy immigrants and a pathway to legal status for [certain farm workers](#). These more positive proposals remain limited in scope and have not been implemented.

Beginning with [Proclamation 10886](#), declaring a national emergency and characterizing unauthorized migration as an “[invasion](#),” the administration has taken unprecedented steps to militarize the border and additional steps to increase border enforcement. [Executive Order 14167](#) formally tasked the military with supporting border enforcement, resulting in the deployment of [about 10,000 service members](#) and [\\$376 million](#) in military expenditures by March 2025. [National Security Presidential Memorandum 4](#) established [National Defense Areas](#) along the border, granting the Department of Defense jurisdiction over federal lands and creating military-controlled zones where migrants can be [detained](#) for trespassing. Border wall construction has accelerated, with a [\\$70 million contract](#) awarded in March for seven miles of new barriers in Texas. Furthering the trend of [falling border encounters](#) throughout 2024 during the previous administration, these measures have contributed to [record-low](#) border encounters, with just [7,181 apprehensions](#) in March 2025, a 95% decrease from March 2024.

The administration has set an ambitious goal of deporting [one million immigrants annually](#), which is more than triple the [previous record of 267,000](#) in fiscal year 2019. The administration has [expanded expedited removal](#) nationwide, established daily arrest [quotas](#), and [permitted](#) enforcement at previously protected [sensitive locations](#). The administration has sought to rely on local law enforcement agencies as a force multiplier, rapidly expanding [287\(g\) agreements](#), including the [revival of Task Force Model](#) agreements, which allow local officers to enforce immigration laws during routine policing. It has also taken steps to threaten so-called [sanctuary jurisdictions](#) and officials in those jurisdictions with civil and criminal penalties and funding cuts if they place limits on immigration enforcement at the state or local level.

Since January 20, the administration has systematically dismantled discretionary immigration pathways established under the previous administration and [suspended refugee admissions](#) indefinitely. It has sought to end the [Cuba, Haiti, Nicaragua, and Venezuela parole program](#) and revoke parole for those who entered under the program, as well as through the [CBP One](#) app; terminated the [Central American Minors program](#); and moved to revoke Temporary Protected Status for nationals of [Venezuela](#), [Haiti](#), [Afghanistan](#), and [Cameroon](#). Several of these actions are the subject of ongoing litigation.

Furthermore, the administration has introduced several measures to promote voluntary departure, including promoting the use of the [CBP Home](#) app (rebranded from CBP One) for self-deportation purposes, facilitating a [data-sharing agreement](#) between the Internal Revenue Service and Immigration and Customs Enforcement, issuing mandatory [registration requirements](#) for undocumented immigrants, revoking [Social Security numbers](#) for certain individuals, and assessing [daily fines](#) of up to \$998 for noncompliance with final orders of removal. These policies

have created [widespread fear and uncertainty](#) in immigrant communities, with many withdrawing from public life and essential services.

Immigration detention capacity has expanded, with the detained population [approaching 50,000](#) by April 2025, with [plans to double](#) that number in the coming years. The administration has reopened [family detention](#) centers, repurposed [military installations](#) for large-scale detention, and signed multibillion-dollar contracts with [private prison operators](#). [Reports](#) of overcrowding, inadequate care, and limited legal access have emerged from facilities nationwide.

The administration has faced numerous legal challenges to its immigration policies. It has [invoked](#) the 1798 [Alien Enemies Act](#), meant for times of war or invasion, to expedite deportations of Venezuelan nationals, leading to [Supreme Court intervention](#) requiring individualized notice and opportunity to contest removal. Amid growing immigration court [backlogs](#), the administration has nonetheless [fired](#) scores of immigration court personnel, including several judges, [reduced](#) the Board of Immigration Appeals from 23 to 15 members, and issued a [directive](#) encouraging immigration judges to dismiss asylum claims [without hearings](#). It also has terminated federally funded [legal services for unaccompanied migrant children](#), an action that has faced [resistance](#) in the federal courts.

Other significant actions include aggressive actions to [revoke](#) nearly 1,500 student visas (which the administration subsequently [reversed](#) in late April), the [restoration](#) of "extreme vetting" standards, plans for a new travel ban targeting [up to 43 countries](#), and an effort to end [birthright citizenship](#) for children of undocumented immigrants and certain noncitizens on temporary visas. The move against birthright citizenship has been [blocked](#) by federal courts pending Supreme Court review. The administration also has [declared](#) English the official language of the U.S., although the practical impact is [limited](#) by existing statutory and constitutional protections.

In summary, the first 100 days of the second Trump administration represent a profound transformation of U.S. immigration policy through an unprecedented series of executive actions, with far-reaching consequences not only for immigrants, refugees, asylum seekers, and their families. While the administration has achieved historically low border encounters, it continues to face significant operational, legal, and fiscal constraints in pursuing its broader enforcement agenda.



## **The First 100 Days of the Second Trump Administration: Key Immigration-related Actions and Impacts**

### **I. Introduction**

The first 100 days of the second Trump administration have ushered in sweeping changes to the U.S. immigration system, marked by an emphasis on border security, expanded enforcement, and the rollback of humanitarian and legal pathways. Through a rapid series of executive actions, agency directives, and regulatory changes, the administration has, among other things, prioritized operational control at the border, increased detention and removal operations, and introduced new restrictions on asylum, refugee resettlement, and legal immigration. Border encounters have continued to decrease dramatically, but administrative actions have also created heightened uncertainty not only for immigrants, refugees, and mixed-status families across the country but also for American businesses, schools, churches, and communities in general.

While restrictions on immigration have been the dominant theme for the first 100 days, the administration has also floated a handful of pro-immigration proposals. For example, President Donald Trump has promoted a new "[Gold Card](#)" program that would offer permanent residency to wealthy foreign investors willing to pay \$5 million or more. This proposal likely would require congressional action to modify the requirements of the existing [EB-5 visa program](#), and many experts question whether there is a viable market for such costly visas. In April 2025, the president endorsed the possibility of a pathway to legal status for farmworkers on multiple occasions, such as during an April 10 Cabinet meeting, when he [suggested](#) certain farmworkers should be able to "stay in for a while" and go through a "legal process" to allow for long-term stability. U.S. Secretary of Agriculture Brooke Rollins subsequently stated that the administration was looking into [relaxing rules](#) for noncitizen farmworkers and would be supportive of H-2A visa reforms. However, formal proposals on these workforce reforms have yet to be introduced, and the main thrust of the administration undoubtedly has been on enforcement and removals.

By chronicling the administration's actions across multiple policy domains, this resource seeks to offer policymakers, stakeholders, and the public a clear picture of how these interconnected measures are reshaping the nation's immigration system.

### **II. Transforming Border Security through Militarization**

Following the intense focus on border security issues in the 2024 presidential campaign, the second Trump administration has made [border security](#) a central priority, rapidly deploying extensive military and federal resources to the southern border. On January 20, 2025, the president issued [Proclamation 10886](#), declaring a national emergency at the southern border and describing unauthorized migration as an "[invasion](#)" requiring extraordinary federal intervention. This was followed by [Executive Order 14167](#), which formally tasked the U.S. military with supporting border enforcement and authorized the use of military assets to deter and repel unlawful entry. By the end of March 2025, the Department of Defense (DOD) had spent about [\\$376 million on military functions](#) related to border security and enforcement, including the deployment of active-duty troops, National Guard units, surveillance towers, and naval assets to support Customs and Border Protection (CBP). Also, a reported [10,000 service members had been deployed or approved for deployment](#) to the southern border region. Testifying before the House Armed Services Committee on April 1, Air Force Gen. Gregory

Guillot, commander of U.S. Northern Command, [stated](#) that about 6,700 active-duty troops were deployed at the border, in addition to roughly 2,500 National Guard members.

On April 11, the administration issued [National Security Presidential Memorandum \(NSPM\) 4](#), directing the Departments of Defense, the Interior, Agriculture, and Homeland Security (DHS) to execute a coordinated military mission to “seal” the southern border. NSPM 4 grants the DOD jurisdiction over specific federal lands, such as the [Roosevelt Reservation](#) — a 60-foot-wide strip along the border in California, Arizona, and New Mexico — excluding federal Indian reservations. These areas, designated as [National Defense Areas](#), are intended to facilitate land transfers and rapid infrastructure deployment. Migrants who cross into these areas under military control can be [detained](#) for trespassing on DOD property and held until CBP arrives to process and deport them.

This arrangement places the military in a temporary detention role typically reserved for domestic law enforcement. By designating these zones as holding areas on military land, the administration seeks to [navigate around restrictions](#) under the [Posse Comitatus Act](#), which generally prohibits the military from performing domestic law enforcement functions. NSPM 4 also [authorizes](#) the construction of additional border barriers and the installation of advanced surveillance systems, with phased implementation beginning in high-traffic sectors and a 45-day assessment period for the initial phase starting April 11. Together, these efforts represent a significant militarization of border security efforts.

Border wall construction has accelerated under a series of executive actions issued on Trump’s second Inauguration Day. Most notably, [Executive Order 14165](#), “Securing Our Borders,” explicitly directs DHS and DOD to establish “a physical wall and other barriers” to ensure “complete operational control” of the southern border. In March, Customs and Border Protection awarded a contract worth more than [\\$70 million for seven miles of new wall](#) in Hidalgo County, Texas, to close gaps “left incomplete” under the previous administration. These construction efforts are further supported by the aforementioned presidential proclamation declaring a national emergency and by additional [orders](#) assigning the military a formal role in border enforcement and infrastructure, enabling the rapid deployment of multiple agencies’ resources and personnel for wall building. While wall construction remains a visible symbol of the administration’s border policy, it is now one part of a broader enforcement strategy that prioritizes military deployments and [advanced surveillance technology](#) alongside physical barriers.

Monthly border encounters have fallen sharply since the start of the second Trump administration, reaching historic lows. In March 2025, CBP reported that it apprehended just [7,181 people](#) crossing the southwest border between ports of entry, representing a 14% drop from the previous month and a 95% decrease compared to March 2024, when apprehensions exceeded [137,000 people](#). The marked decline in border encounters [began in 2024](#) under the Biden administration but accelerated after Trump took office in January 2025. CBP officials have credited these policies, along with increased military support, for achieving the lowest monthly border crossings [ever recorded](#), as average daily apprehensions dropped to just 264 in March 2025.

### **Key Actions:**

- Declared a national emergency at the southern border through Proclamation 10886.
- Issued Executive Order 14167, assigning the U.S. military a border enforcement role.
- Deployed or approved upcoming deployments of more than 10,000 service members to the southern border region.

- Spent approximately \$376 million on military functions related to border security by the end of March 2025.
- Issued NSPM 4, granting DOD jurisdiction over border lands and authorizing new National Defense Areas, surveillance, and phased implementation.
- Resumed and expanded border wall construction.

#### ***Impacts:***

- Significant military presence along the southern border.
- Establishment of new National Defense Areas and military-controlled zones.
- Expansion of border infrastructure and surveillance capabilities.
- Ongoing legal and operational questions regarding military roles in domestic enforcement.
- Record-low monthly border encounters: March 2025 saw just 7,181 southwest border apprehensions, a 95% decrease from March 2024.

### **III. Pursuing Aggressive Enforcement and Removal Strategies**

The second Trump administration has set an unprecedented goal of deporting [1 million immigrants per year](#), a figure repeatedly cited by White House Deputy Chief of Staff Stephen Miller and far surpassing any previous annual removal record. For comparison, during Trump's first term, total ICE removals peaked at [more than 267,000](#) in fiscal year 2019, with interior removals (of people arrested within the U.S., not at the border) reaching 85,958 that year. Under former President Joe Biden, removals increased sharply in fiscal year 2024 to [more than 271,000](#), the highest in a decade. But, reflecting the unprecedented increase in border encounters, the vast majority of removals under President Biden were from the border, not the interior. Achieving 1 million deportations annually would require more than tripling the highest removal totals on record and scaling up Immigration and Customs Enforcement's (ICE) current operations far beyond contemporary levels. [Recent reports](#) have indicated that the administration "seems to be coalescing around a more realistic goal" of 600,000 removals per year, which nevertheless would represent a dramatic expansion over any historical precedent and would necessitate significant new resources, infrastructure, and legal authority.

Despite these ambitious aims and dramatic increases in interior immigration enforcement efforts, the actual pace of deportations in the first 100 days of the second Trump administration has been far lower. ICE [data show](#) that from March 1-28, 2025, just over 12,300 individuals were removed, a slight increase from February, when ICE deported about 11,000 individuals. This slower pace is partly attributed to a sharp decline in border apprehensions, which fell to just over 7,000 encounters in March — a historic low that the administration has [touted](#) as evidence of the effectiveness of its border security measures. Also of note, interior enforcement operations have extended beyond individuals targeted as threats to public safety; a significant number of those apprehended are [collateral arrests](#) of bystanders and family members in the presence of a targeted individual, including multiple reports of [U.S. citizens](#) having been detained mistakenly.



Limited funding, ongoing legal challenges, and the complexity of removing long-term residents have limited the administration's ability to scale up removals to the levels promised during the campaign, the transition, and the opening days of the new administration. With significant increases in detention capacity, manpower, and enforcement funding likely to be [approved by Congress via the reconciliation process](#) in spring 2025, the administration will likely look to ramp up interior enforcement and removals dramatically.

While awaiting congressional appropriations, the second Trump administration has fundamentally restructured the landscape of interior immigration enforcement to accelerate removals. Beginning in January, the administration [expanded](#) expedited removal authority, under which undocumented persons are subject to immediate deportation without a hearing before an immigration judge. Previously, expedited removal was [limited](#) to undocumented individuals apprehended within two weeks of their arrival in the U.S. and within 100 miles of a U.S. land border. Under the new policy, which expands the use of expedited removal to the fullest extent authorized by Congress, undocumented persons can be apprehended anywhere in the country and, if they cannot demonstrate that they have resided in the U.S. for longer than two years, are subject to immediate deportation without a hearing before an immigration judge.

ICE has been directed to prioritize rapid processing, with new daily arrest [quotas](#) set at 1,200 to 1,500 individuals. Enforcement actions are now permitted to target sensitive locations, including schools, hospitals, courthouses, and places of worship. Multiple state attorneys general have [issued guidance](#) to entities such as nonprofits, human service organizations, hospitals, and places of worship on how to respond to requests from federal immigration authorities, including ICE, and some states and localities have reaffirmed their commitment to protecting immigrant students and families in these types of sensitive locations.

In an effort to use local law enforcement as “force multipliers” for interior immigration enforcement, the Trump administration has made the rapid expansion of [287\(g\) agreements](#) a central strategy, with a particular focus [on reviving the Task Force Model](#) (TFM), which had been [discontinued](#) more than a decade ago due to widespread reports of abusive practices and legal violations. As of April 21, 2025, the number of active 287(g) Memoranda of Agreement (MOAs) had surged to [456 across 38 states](#), more than a sevenfold increase from the 60 Jail Enforcement Model (JEM) and 75 Warrant Service Officer (WSO) agreements in place at the end of 2024. Notably, in jurisdictions with new or revived TFM agreements, deputized local officers are allowed to enforce immigration laws in the field during routine policing operations.

To accelerate further expansion of 287(g) agreements and lower costs to participating agencies, ICE is piloting [regional training centers](#) and condensed training programs, including a new 40-hour online curriculum for TFM participants, replacing the previously required four-week course. While the administration touts these efforts as essential to achieving its enforcement goals, the rapid expansion — especially of the TFM — raises serious concerns about oversight, costs for local law enforcement, and the erosion of community trust, particularly in light of the program's [troubled history](#).

As occurred during the first Trump administration, this administration has also [threatened](#) to withhold federal funding from so-called sanctuary [cities](#) that place limits on local law enforcement agencies' immigration enforcement activities. On April 28, it was announced that President Trump [plans to sign](#) an executive order directing the attorney general and DHS to gather a list of such jurisdictions that could face federal funding cuts. The administration has threatened civil and criminal penalties against jurisdictions and officials who decline cooperation. These threatened retaliatory actions have been blocked [in the courts](#).

### ***Key Actions:***

- Publicly set a goal of deporting 1 million immigrants annually, a figure more than triple the highest annual removal record on record (267,000 in fiscal year 2019).
- Established new daily arrest quotas of 1,200 to 1,500.
- Increased interior enforcement activities, including growing numbers of collateral arrests of bystanders and family members, with reports of mistaken detention of U.S. citizens.
- Expanded expedited removal authority nationwide, allowing ICE to rapidly deport undocumented individuals apprehended anywhere in the U.S. if they have resided in the country for two years or fewer.
- Permitted ICE officers to conduct enforcement operations at sensitive locations, including schools, hospitals, courthouses, and places of worship.
- Rapidly expanded 287(g) agreements with local law enforcement, including reinstatement of Task Force Model agreements.
- Planning to launch regional training centers and condensed training programs for 287(g) participants, including a new and reduced 40-hour online curriculum, to accelerate 287(g) program expansion.
- Threatened officials in so-called sanctuary jurisdictions with civil and criminal penalties and loss of federal funding.
- Requested additional congressional funding for detention and enforcement, with plans to increase ICE capacity and resources dramatically.

***Impacts:***

- Despite ambitious deportation targets, actual removals in the first 100 days remain well below stated goals, with ICE removing just over 12,300 individuals in March 2025.
- Sharp decline in border apprehensions (just over 7,000 in March 2025), touted by the administration as evidence of effective border control. Reductions in border encounters also have contributed to a slower pace of removals.
- Expanded expedited removal and revived 287(g) Task Force Model agreements have increased enforcement in communities and have exposed long-term residents and bystanders to rapid deportation.
- The gap between mass deportation goals and operational reality remains significant, with future increases in removals dependent on congressional approval of new funding and expansion of detention infrastructure.

#### **IV. Ending Discretionary Immigration Pathways Created Under the Biden Administration, Halting Refugee Resettlement, and Restricting Other Programs**

In its first 100 days, the second Trump administration has moved aggressively to dismantle many discretionary immigration pathways established or expanded under the Biden administration, targeting both new arrivals and lawful residents. These actions have left hundreds of thousands of migrants and refugees in legal limbo, stranded abroad, or abruptly stripped of protections and work authorization within the U.S. For example, the new

administration has rebranded and repurposed the Biden-era [CBP One](#) app as [CBP Home](#). CBP One, which had allowed migrants to schedule asylum interview appointments at ports of entry along the U.S.-Mexico border, was [abruptly suspended](#) on January 20, leaving about [270,000 migrants stranded](#) in Mexico. (See the next section for more on CBP Home.)

The administration also moved swiftly to restrict access to asylum and humanitarian protections at both the northern and southern borders of the U.S. The so-called [Migrant Protection Protocols](#) (MPP), also known as “Remain in Mexico,” were [reinstated](#) on January 21, requiring asylum seekers to wait in Mexico while their cases were adjudicated. However, a federal judge [issued](#) an [emergency nationwide injunction](#) halting the reinstatement of the protocols on April 16. The administration also [terminated](#) the [Central American Minors](#) (CAM) program and the family reunification parole programs for some Cuban, Guatemalan, Haitian, Colombian, and Salvadoran immigrant visa applicants. Additionally, on January 20, the administration ordered the closure of [Safe Mobility Offices](#) in Latin America, which had provided legal pathways for migrants to apply for U.S. entry from abroad.

On January 21, DHS [announced](#) that ICE and CBP would “phase out any parole programs that are not in accordance with the law.” On January 23, DHS [informed](#) ICE agents that they should “[r]eview the alien’s parole status to determine, in exercising your enforcement discretion, whether parole remains appropriate in light of any changed legal or factual circumstances.” The Cuba, Haiti, Nicaragua, and Venezuela (CHNV) parole program was paused immediately upon Trump’s return to office, and, in March, DHS [said](#) it would give CHNV beneficiaries 30 days to leave the U.S. voluntarily; otherwise they would face removal. Administration officials [said](#) they would prioritize the arrest of migrants who had failed to apply for another immigration benefit, such as asylum or a green card. On April 14, a federal district court judge issued a temporary nationwide order [suspending](#) the termination of CHNV that had been set to take effect April 24 and would have ended parole authorization and any associated benefits, including work authorization. On April 17, U.S. Citizenship and Immigration Services (USCIS) [announced](#), “Pursuant to the order, the parole termination notices that were sent to aliens from Cuba, Haiti, Nicaragua, and Venezuela pursuant to the Federal Register notice are stayed and therefore not currently in effect.” However, no new requests for parole under CHNV are being processed.

On April 8, the administration [revoked](#) parole and work authorization for about 985,000 migrants who entered the U.S. under the Biden-era CBP One program, [sending](#) official notices instructing them to “leave the country immediately” and warning that they will be permanently barred from reentry if they do not comply. Parolees under the Uniting for Ukraine and Operation Allies Welcome programs (including Afghan allies and other evacuees) are [currently exempted](#) from this mass revocation.

The administration has moved aggressively to revoke or restrict Temporary Protected Status (TPS) for nationals of [Venezuela](#), [Haiti](#), [Afghanistan](#), and [Cameroon](#). TPS for Venezuela was set to be terminated in early April, putting about 350,000 Venezuelans at risk of losing protections and work authorization, but on March 31, a federal judge in San Francisco [issued a nationwide injunction](#) requiring DHS to continue TPS for Venezuelans while litigation proceeds. DHS has appealed, stating that it intends to end Venezuelan TPS as soon as the court order is lifted. Similarly, the TPS redesignation for Haiti, covering 150,000 people, was [revoked](#) in February, but litigation over the revocation is ongoing. In each case, the administration has continued to defend its terminations in court, warning on USCIS webpages that TPS will end as soon as legal obstacles are removed.

Also, on January 20, the president issued a [series of executive orders](#) that immediately suspended the U.S. Refugee Admissions Program (USRAP), halting both pending and future refugee entries. This action canceled more than [10,000 scheduled refugee flights](#) and stranded



at least [22,000 refugees who already were approved to travel](#), including Afghans who aided U.S. forces and family members of U.S. military personnel. The executive order imposed an indefinite suspension on refugee resettlement, as resumption of the USRAP now depends on a completed, as yet [unreleased](#) 90-day review of the program by DHS and the State Department and a determination by the president that refugee admissions serve the “national interest.” This framework effectively freezes the program for the foreseeable future, [undermining decades of bipartisan commitment](#) to refugee protection and leaving vulnerable populations without viable pathways to safety. [About 600,000 people](#) had been under consideration for admission to the U.S. as refugees at the time of the program’s suspension.

The executive actions fundamentally altered the goals and structure of the USRAP, [shifting its mission](#) away from humanitarian protection toward a framework centered on national security, assimilation, and state and local control. Through [Executive Order 14163](#), the administration declared that refugee admissions would resume only if they “align with the interests of the United States.” The order states that public safety and national security are now the paramount considerations and that only refugees who can “fully and appropriately assimilate” should be admitted while also emphasizing the need to “preserve taxpayer resources for its citizens.” This marks a sharp departure from the longstanding history and statutory purpose of the USRAP, which [prioritized](#) resettling those facing persecution and humanitarian crises, regardless of their perceived ability to assimilate or the preferences of individual states and localities. The administration also has [required](#) refugees to undergo new “stringent identification verification,” exceeding previously mandated procedures, effectively invalidating prior vetting — which was extensive — and pausing all case processing for refugees already in the pipeline. A court order has since [required](#) the administration to process and resettle tens of thousands of conditionally approved refugees, but the government has stated it could take months to restart operations due to staff layoffs and new vetting requirements. The administration’s actions have already necessitated [large furloughs and layoffs](#) among refugee-serving nonprofits.

Afghan allies have been negatively [impacted](#) by these and other administration actions, including foreign aid cuts. Some who were granted Special Immigrant Visas (SIVs) or humanitarian parole after the 2021 withdrawal have been unable to reunite with family or adjust their status despite prior approvals. In addition, the administration has [moved](#) to “close out” the Enduring Welcome program for Afghans and to terminate funding for the [office overseeing the resettlement of Afghans](#).

Deferred Action for Childhood Arrivals (DACA) also remains in legal and political limbo. On March 10, the Fifth Circuit Court of Appeals [ruled against](#) the Biden administration’s DACA rule as currently constructed but allowed current recipients to retain work authorization and protections from deportation, as well as renew their protections while the case proceeds. The decision also permitted — but did not require — applications from new applicants to be processed (absent work authorization for those in [Texas](#)). While the president has [suggested](#) he would work with Congress on the issue of Dreamers, he has not yet proposed any concrete legislative proposals to protect them, nor does the administration appear to have restarted processing new DACA applicants. Notably, however, the administration has not acted to undermine DACA, refraining from taking steps to remove or limit DACA protections through the rulemaking process or other administrative actions. Amid continued inaction and ongoing litigation, DACA recipients and their families continue to face increased anxiety about their future.

### ***Key Actions:***

- Terminated the Central American Minors program, family reunification parole, and Special Mobility Offices.

- Shut down the CBP One app, canceled 270,000 pending asylum appointments, and rebranded it as CBP Home.
- Sought to reinstate the so-called Migrant Protection Protocols (MPP), forcing asylum seekers to remain in Mexico.
- Paused the CHNV parole program and revoked parole and work authorization for hundreds of thousands of migrants, instructing them to leave immediately.
- Rescinded TPS for Venezuela, Haiti, Afghanistan, and Cameroon, with court challenges ongoing.
- Suspended all U.S. refugee admissions, canceled 10,000 scheduled flights, and stranded at least 22,000 approved refugees.
- Altered the goals of the U.S. Refugee Admissions Program to center upon administratively defined “national interest.”
- Required new, stringent identification verification for refugees, paused all case processing, and invalidated prior approvals.

### ***Impacts:***

- Closure of Safe Mobility Offices and legal pathways in Latin America leaves migrants with few safe options for legal migration to the U.S.
- Tens of thousands of refugees and asylum seekers stranded abroad or in Mexico, with canceled flights and appointments.
- More than 900,000 CBP One parolees and their families are at risk of deportation, loss of work authorization, and financial hardship.
- TPS revocations threaten hundreds of thousands with imminent loss of status and deportation.
- DACA recipients continue to face ongoing legal uncertainty; new applicants are blocked from protection.

## **V. Promoting Voluntary Departure and Self-deportation**

The second Trump administration has made the promotion of voluntary departure and self-deportation central to its immigration enforcement strategy, and it has introduced a series of new tools and increasingly punitive measures to pressure migrants to leave the U.S. on their own. The president has publicly promoted the self-deportation initiative, [stating](#) in an interview on April 14 that the administration intends to offer stipends and plane tickets to those who leave voluntarily, with possible pathways for legal reentry in the future. However, as of late April, no formal stipend program has been implemented, and these policies — including fines, asset seizures, registration requirements, and loss of work authorization — have created [widespread fear and uncertainty](#), prompting many migrants in the U.S. to withdraw from public life and avoid essential services.

As noted above, in March 2025, DHS relaunched [CBP One](#) as the [CBP Home](#) app, now designed to facilitate self-deportation. The new app allows migrants with final removal orders or revoked parole status to [notify](#) the federal government of their intent to depart and to schedule their own departure flights. Despite administration claims that self-deportation could preserve eligibility for future legal entry, observers have [warned](#) that using the app may not shield migrants from the statutory [three- and ten-year reentry bars](#) for those with extended periods of unlawful presence.

On April 8, the administration [finalized](#) an agreement between the Internal Revenue Service (IRS) and ICE, granting ICE real-time access to taxpayer information, including addresses and

employer details, to help identify and target individuals for removal. Advocates [warn](#) that this policy could deter tax compliance and destabilize mixed-status families. The finalization of the agreement between the IRS and ICE prompted many top IRS officials to [resign](#).

Additionally, in late February, the administration announced it would require certain undocumented immigrants to register with DHS and, on March 7, it published a new rule outlining the process. The rule, which took effect after a [court ruling](#) on April 11, requires undocumented immigrants [who have not previously registered](#) with the government to create a USCIS online account and submit the new [Form G-325R](#), providing detailed biographic information and, where required, to appear for fingerprinting at a USCIS service center. Federal authorities have made clear that the information gathered through registration will be used to locate, apprehend, and remove individuals, and they have explicitly [threatened](#) civil and criminal penalties for those who fail to register.

Also in mid-April, the Social Security Administration began [revoking](#) Social Security numbers for migrants flagged by ICE as suspected terrorists or convicted criminals, using what is now called the “ineligible master file” (previously known as the [Death Master File](#)) to terminate benefits and employment eligibility. The first group to be added to the file included parolees who had entered through Biden-era parole programs and whose temporary status had just been revoked. This move effectively classifies these individuals as deceased in government and financial records, cutting off access to banking, credit, and government assistance and creating significant financial hardship.

Additionally, the administration announced that it will impose [daily fines of up to \\$998](#) for migrants under deportation orders who fail to leave the U.S., with penalties retroactively applied for up to five years. These fines, permitted by statute in 1996 but previously rarely employed, [target](#) roughly 1.4 million people who have been issued a final order of removal. The administration also reportedly is considering seizing property from migrants unable to pay, using civil asset forfeiture laws. Internal documents reveal that the White House [pressed](#) CBP to manage the fines and asset seizures, but CBP raised concerns about the administrative burden, estimating it would need to hire around 1,000 additional paralegal specialists to handle enforcement.

### ***Key Actions:***

- Launched the CBP Home app with a self-deportation feature for migrants with final removal orders or revoked parole status.
- Implemented a mandatory registration rule targeting undocumented immigrants and requiring biometric and personal data submission to ICE.
- Finalized an IRS-ICE data-sharing agreement to identify and target individuals for removal using taxpayer information.
- Began revoking Social Security numbers for flagged migrants using the “Death Master File,” cutting off access to banking, credit, and employment.
- Announced daily fines of up to \$998 for noncompliance with removal orders, retroactively applied, with proposed property seizures for nonpayment.

### ***Impacts:***

- Migrants face significant potential legal and financial risks, including asset seizures and potential reentry bars.
- Widespread fear and instability in immigrant communities, with many withdrawing from public life and essential services.

- Legal and advocacy groups warn that these measures may undermine due process, deter tax compliance, and destabilize mixed-status families.

## VI. Expanding the U.S. Detention System

To address increased apprehensions and processing needs (as well as [efforts to halt](#) so-called “[catch and release](#)” policies), the second Trump administration has begun to increase immigration detention capacity across the U.S., with plans to expand it dramatically. The administration has signed several multibillion-dollar agreements with private prison operators to reopen and expand shuttered and aging facilities, including some with documented histories of poor conditions and inadequate care. For example, [Delaney Hall](#) in Newark, New Jersey, is set to become the largest ICE processing and detention center on the East Coast under a \$1 billion, 15-year contract. Pending congressional passage of appropriations to expand enforcement and detention, ICE is [seeking](#) to allocate up to \$45 billion over the next two years for further expansion of detention infrastructure and services, with a goal of increasing ICE’s daily detention capacity to at least 100,000 beds. If approved, the expansion would represent more than a sixfold increase in detention spending [compared to current appropriations](#) and could more than double the highest daily detention levels reached under either the Biden administration or the first Trump administration.

In the administration’s first 100 days, substandard conditions have been [widely reported](#) at immigration detention sites across the United States. At Miami’s [Krome Processing Center](#), for example, lawyers, family members, and detainees reported severe overcrowding, food and water shortages, poor hygiene, slow or inadequate medical care, and lack of legal access in March. ICE has stated that it maintains strict standards for medical and mental health care, but advocates and detainees continue to report serious deficiencies and abuses.

Last year, Congress [appropriated](#) \$3.4 billion in funding for ICE to detain a daily average of 41,500 people. On March 12, DHS [claimed](#) that its detention facilities were “at capacity, housing about 47,600 individuals,” and administration officials suggested that migrants would be released due to crowding concerns. On March 23, the detained population was up to [about 47,900](#), and, by early April, it had reached [more than 49,000](#), prompting renewed concerns of [overcrowding](#). Advocates argue that the number of detainees is ballooning because of increased arrests and because ICE officials are not exercising discretion to release people who would normally qualify for bond or parole.

The practice of family detention, which largely [ended](#) under the previous administration, has been [revived](#). The [South Texas Family Residential Center](#), a privately operated facility in Dilley, Texas, is reopening to detain up to 2,400 individuals, including children, under a new contract through 2030. Meanwhile, the Karnes County facility in Texas, which was [constructed](#) as part of an “intergovernmental service agreement” between ICE, the county, and a private prison operator, has also [resumed](#) family detention. Critics and medical professionals have long [cautioned](#) that family detention is both costly and especially harmful to children, leading to emotional and physical health issues. Reports of inadequate care, threats to family unity, and poor conditions have resurfaced.

The administration is also repurposing military installations for large-scale detention. [Fort Bliss](#), near El Paso, Texas, had been designated as a central hub for deportation operations, with construction underway for a “tent camp” that could eventually hold [up to 10,000 migrants](#),

although an initial \$3.8 billion contract announced by ICE [fell through](#) in late April. Similar plans are being developed for other [military bases nationwide](#), and Naval Station Guantanamo Bay in Cuba has been [directed](#) to be expanded to full capacity to [detain migrants slated for deportation](#), with both “high-priority criminal aliens” and nonviolent migrants being held there. In February, about 1,100 troops were [sent](#) to Guantanamo Bay to support detention operations, with costs reaching nearly [\\$40 million](#) in the first month. These troops established [195 tents](#) at the site, although as of mid-April, the tents [had not been used](#) to house migrants. Moreover, a March 7 memo detailing an agreement between DOD and DHS indicates that the Trump administration gave officials broad discretion in deciding which migrants to send to Guantanamo Bay, [contradicting](#) the president’s statements that the facility would house “the worst of the worst.”

### ***Key Actions:***

- Announced a \$45 billion funding request for further detention expansion and services.
- Increased detention capacity to more than 46,000 beds, with plans for 30,000 more on military bases and through private contracts, while waiting for Congress to appropriate funds through reconciliation.
- Reopened and expanded family detention centers, including in Dilley and Karnes County, Texas.
- Repurposed military bases, including Fort Bliss and Guantanamo Bay, for large-scale migrant detention, with ongoing planning for facilities to hold up to 10,000 at Fort Bliss and expanded capacity at Guantanamo Bay.
- Signed multibillion-dollar contracts with private prison operators to reopen or expand detention facilities in at least eight states.

### ***Impacts:***

- Widespread reports of overcrowding, inadequate care, and legal-access issues at detention centers.
- Revival of family detention, exposing children and parents to conditions associated with psychological and physical harm.
- Rapid expansion of private and military-run detention infrastructure, raising concerns about oversight, accountability, and detainee welfare.
- Ongoing legal challenges and protests from advocacy groups over the use of Guantanamo Bay and military sites for migrant detention and over substandard conditions nationwide.

## **VII. Ongoing Litigation and Challenges to Due Process**

A primary foreign-policy focus of the second Trump administration has been the negotiation and implementation of reenvisioned “safe third country” and asylum cooperative agreements, as outlined in [Executive Order 14165](#). Before January 20, 2025, the only safe third country agreement in effect was between the U.S. and [Canada](#), which allowed each country to return asylum seekers who crossed their shared border. During the first Trump administration, the U.S. negotiated various agreements with Guatemala, Honduras, and El Salvador. These so-called “[asylum cooperative agreements](#)” required migrants who transited those countries to seek asylum there rather than in the U.S., but they were widely criticized because none of the



participating countries met the legal or humanitarian standards [required](#) for safe third country status. Only the agreement with Guatemala was implemented, and all three were [suspended](#) during the Biden administration.

Within its first 100 days, the second Trump administration announced it was pursuing or expanding deportation agreements with [Guatemala](#), [Panama](#), [Costa Rica](#), and [El Salvador](#), and officials are reportedly in discussions with [up to 30 countries](#) to accept noncitizen deportees. For example, in late April, reports emerged that the administration had reached an agreement with [Rwanda](#) to accept deportees who cannot be sent back to their country of origin due to fears of prosecution. However, some recipient countries have expressed [concerns](#) about their capacity to absorb large numbers of deportees, and some, such as [Colombia](#), initially pushed back against U.S. deportation flights.

The yearlong agreement with El Salvador was [announced](#) just days after President Trump [invoked](#) the [Alien Enemies Act](#) (AEA), an 18th-century wartime statute, to expedite the deportation of alleged members of the Venezuelan gang Tren de Aragua on March 15. That same day, the administration deported [238 Venezuelan men](#) to [the Center for Terrorism Confinement](#) (CECOT) prison in El Salvador, including 137 men removed under the AEA. The men were not charged criminally and received no immigration hearing or other opportunity to challenge their arrest, removal, and indefinite detention in El Salvador. A federal district court temporarily [blocked](#) the deportations, ruling that the administration's actions warranted judicial scrutiny and that those targeted must be given a chance to contest their removal. However, the administration [proceeded](#) with deportations, arguing that the court's order was either invalid or issued after flights had already departed and went on to invoke the state secrets privilege.

On April 8, the Supreme Court [lifted](#) the lower court's halt on the removals but required that deportees receive individualized notice and an opportunity to challenge their removal in court, a requirement that, in practice, remains difficult for many detainees to exercise. Subsequently, on April 19, the Supreme Court, in a 7-2 decision, issued [another order](#) temporarily halting further deportations of Venezuelan men detained in Texas after lawyers argued that their clients had not been properly notified of their rights to contest the decision. Litigation continues in multiple states over the administration's use of the AEA, with courts now grappling with what due process protections must be afforded to those targeted under this 1798 law.

Along with other [high-profile cases](#), the Trump administration has sought to use emergency and/or wartime authority to expedite deportations and has litigated aggressively to minimize judicial oversight and legal limitations to the removals, with negative impacts on due process. It continues to face legal [hurdles](#) in [multiple cases](#).

### ***Key Actions:***

- Began negotiation and implementation of deportation agreements with Guatemala, Panama, Costa Rica, and El Salvador, and initiated talks with additional countries, including Rwanda.
- Invoked the AEA to expedite deportations, repeatedly defied court orders, and invoked the state secrets privilege to withhold operational details. However, some AEA removals were temporarily paused by the U.S. Supreme Court.

### ***Impacts:***

- High-profile legal cases have led to executive-judicial conflict, with lower courts and the Supreme Court repeatedly intervening to clarify due process obligations.

- Legal and advocacy groups warn that the administration's actions have destabilized the immigration court system and undermined basic due process.

## VIII. Changing Immigration Courts and Cuts to Grants and Personnel

In its first 100 days, the second Trump administration has implemented sweeping changes to the U.S. immigration court system, overseen by the U.S. Department of Justice (DOJ). Unlike an Article III federal judge, immigration judges are employed by DOJ and do not receive life tenure. Beginning in February 2025, at least 20 immigration judges, including [newly appointed](#) and assistant chief judges, were [fired](#), and the Board of Immigration Appeals (BIA) was [reduced](#) from 23 to 15 members through an interim final rule. By March 6, a total of 85 employees, including 18 judges, at the DOJ's Executive Office for Immigration Review (EOIR) had [accepted](#) early retirement or deferred resignation offers as part of broader federal workforce reductions.

The firings and resignations came as the [mounting](#) immigration court backlog reached a record [3,629,627](#) active cases at the end of March. Another wave of [dismissals](#) in April affected at least eight more immigration judges in Massachusetts, California, and Louisiana, many of whom were not given explanations for their termination. These cuts have raised concerns among legal experts, lawmakers, and the immigration judges union, who [warn](#) that removing experienced judges, who typically handle 500 to 700 cases per year, will only worsen the backlog and threaten due process for noncitizens facing deportation.

On April 11, EOIR issued a [directive](#) encouraging immigration judges to dismiss “legally deficient” asylum claims [without a hearing](#), relying solely on the written application. The administration has framed this policy shift as an effort to streamline dockets and accelerate case completions, but it has drawn significant [criticism](#) for increasing the risk of erroneous removals, particularly for asylum seekers without legal counsel. As most immigrants in removal proceedings lack representation, advocates argue that the new policy severely limits their ability to present their claims and defend against deportation.

Moreover, in March, the administration [terminated](#) federally funded legal services for approximately 26,000 unaccompanied migrant children. Although a federal court [ordered](#) the government to resume funding on April 1, the administration has not released funds to service organizations, leaving many children forced to navigate complex immigration proceedings [alone](#).

The Trump administration's new Department of Government Efficiency (DOGE) has enacted [broad cuts](#) to personnel who work on immigration matters and grants related to immigration policy. DHS quickly [eliminated millions of dollars in grants](#) for naturalization and language access programs, civics instruction, and other projects the administration has deemed “wasteful.” In addition, the administration has ended longstanding contracts for large-scale [naturalization ceremonies](#), redirecting new citizens to smaller field offices and likely increasing wait times for those seeking to complete the naturalization process.

### **Key Actions:**

- Terminated or offered early retirement scores of EOIR employees, including immigration judges, and reduced the Board of Immigration Appeals from 23 to 15 members. Issued directives encouraging immigration judges to dismiss asylum claims without hearings, accelerating deportations and limiting due process.

- Terminated federally funded legal services for about 26,000 unaccompanied migrant children despite a federal court order to restore funding.
- Enacted cuts to personnel and grants related to immigration matters, including naturalization and language access programs, and canceled large-scale naturalization ceremonies.

### ***Impacts:***

- Immigration court backlog continues to grow, with more than 3.6 million pending cases and diminished judicial capacity.
- Due process protections are eroded as judges are empowered to dismiss cases without hearings, and vulnerable asylum seekers — especially unrepresented children — face an increased risk of erroneous removal.
- Created additional barriers for immigrants seeking citizenship and integration into American society.

## **IX. Revoking Student Visas**

The second Trump administration has dramatically escalated its scrutiny of international students and visitors through the “[Catch and Revoke](#)” program, which uses [artificial intelligence](#) to monitor social media activity for keywords, associations, or content perceived as supportive of U.S.-designated terrorist groups or antisemitic activity. This effort, coordinated by the State Department, DHS, and ICE, marks a dramatic expansion in the government’s policing of foreign nationals’ speech and conduct, and by mid-April 2025, nearly 1,500 student visas had been [revoked](#), affecting students at more than 200 colleges and universities nationwide.

The revocations have [impacted](#) holders of F-1 and J-1 visas, as well as some Optional Practical Training (OPT) extensions. Many students learned of their visa cancellations only after receiving unexpected emails from DHS or the State Department, directing them to use the CBP Home app to begin the “self-deportation” process. In some cases, students and their institutions [discovered](#) their status had been revoked only when attempting to travel or through routine university record checks, with little or no formal explanation provided.

The government has [justified](#) these actions under Section 212(a)(3)(C) of the Immigration and Nationality Act, which allows for visa revocation if a visa holder is deemed a “foreign policy threat.” Secretary of State Marco Rubio publicly [stated](#) that more than 300 student visas were revoked in March alone, specifically citing students involved in pro-Palestinian demonstrations, including the highly publicized arrest of Columbia University graduate student [Mahmoud Khalil](#), a lawful permanent resident, and [Rümeysa Öztürk](#), a Ph.D. candidate on an F-1 visa at Tufts University. Indeed, in the short period since the program was announced, the scope of “Catch and Revoke” has broadened beyond political activism. Visa revocations have also been issued for [minor infractions](#), including traffic violations or past misdemeanors. This has created an environment of uncertainty, with universities often not notified of a student’s change in status and students left at risk of accruing unlawful presence or facing sudden detention.

The consequences for American higher education have been immediate and far-reaching. About [1.1 million international students](#) were in the U.S. last year, providing essential revenue for tuition-driven colleges, as they are not eligible for federal financial aid and often pay full price. As a consequence of the administration’s actions during its first 100 days, universities across the

country [fear](#) declining international applications in the coming months and years, as they already experience growing [anxiety](#) among current students.

On April 25, in response to mounting criticism and facing legal challenges, the administration [indicated](#) it would be reversing the revocations and is exploring a new system to review and terminate student visas.

### ***Key Actions:***

- Launched the "Catch and Revoke" program, using AI to monitor social media and campus activism.
- Revoked more than 1,000 student visas by mid-April 2025, with many students notified only after the fact.
- Formalized policy requiring social media screening for all immigration benefit applicants, including students and green card, asylum, and citizenship applicants.
- Recently announced it would be reversing the student visa revocations and putting a new policy in place to review student visas.

### ***Impacts:***

- American universities fear declining international applications and competitiveness.
- Fear of surveillance and arbitrary revocation has raised concerns over free speech.
- Many students have been left in legal limbo, at risk of detention and deportation, often without clear explanation or due process.

## **X. Intensifying Vetting and Threatening Travel Bans**

Since January 20, the second Trump administration has proposed a series of sweeping changes to standard immigration processes, emphasizing heightened national security, stricter vetting, and new restrictions across multiple immigration pathways.

The administration's early efforts include [Executive Order 14161](#), "Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats," signed on Inauguration Day. This order directed the secretary of Homeland Security, attorney general, and director of national intelligence to restore the "extreme vetting" standards from Trump's first term and to ensure that all individuals seeking admission to the U.S. or already present in the country are vetted to the maximum degree possible. In keeping with the order, DHS and USCIS [proposed](#) a requirement that all applicants for immigration benefits, including green cards, asylum, and citizenship, disclose their social media handles and submit to mandatory social media screening as part of new "[uniform vetting standards](#)." Under the proposed guidance, any social media content deemed to endorse or promote antisemitic terrorism or extremist groups may be grounds for visa denial or revocation, and these policies now apply to a broad range of applicants, not just students. Civil rights advocates warn that these measures raise serious [concerns](#) about privacy, due process, and freedom of expression, and lawsuits challenging the constitutionality of mass revocations and surveillance, in addition to the detention of individual students, are ongoing.

Executive Order 14161 required the leadership of DHS, DOJ, and the National Security Council to submit a joint report by March 21, 2025, identifying countries with deficient screening information and recommending whether nationals from those countries should face partial or full suspension of admission under section [212\(f\) of the Immigration and Nationality Act](#). The

report further called for data on how many nationals from these countries have entered the U.S. since January 2021. After the report's completion and building on these directives, the administration reportedly has been moving to finalize an expansive new travel ban. As of late April, internal administration memos and media reports indicate that the proposed ban could restrict or bar entry for citizens of [up to 43 countries](#). The final list of countries and the effective date for the new travel ban have not yet been announced, fueling anxiety among applicants and their families. At the time of publication of this National Immigration Forum overview, the ban had yet to be formally released and may be subject to modification.

Meanwhile, humanitarian immigration pathways have already been affected by delays and suspensions as a result of such directives. In March, USCIS [paused](#) green card processing for refugees and asylees, citing executive orders [14161](#) and [14157](#), which focus on national security and the designation of foreign terrorist organizations, respectively. This indefinite pause has left thousands of refugees and asylees already living in the U.S. [unable to apply for permanent residency](#), even though advocates [note](#) that many have completed all required security vetting. As the Trump administration moves to [dismantle](#) the legal pathways that allowed their admission, these individuals remain in legal limbo with no clear timeline for when or if they will be able to secure lawful permanent status.

### ***Key Actions:***

- Issued Executive Order 14161, restoring “extreme vetting” standards and requiring agencies to identify high-risk countries for potential entry restrictions.
- Ordered a comprehensive review of visa and immigration policies and mandated a joint agency report on vetting deficiencies and admissions data.
- Proposed a new travel ban targeting more than 40 countries in a tiered system, with some nations potentially facing a full entry ban.
- Suspended green card processing for refugees and asylees, citing national security executive orders.

### ***Impacts:***

- Widespread anxiety and confusion among prospective immigrants, particularly those from countries targeted for new travel restrictions.
- Thousands of refugees and asylees are unable to complete the process for permanent residency and may become vulnerable to deportation if they are unable to renew their status.

## **XI. Challenging Longstanding Citizenship and Language Policies**

Through [Executive Order 14160](#), signed on January 20, 2025, President Trump sought to end [birthright citizenship](#) for children of undocumented immigrants and noncitizens on temporary visas, reinterpreting the 14th Amendment. Breaking from more than a century of legal precedent, the order seeks to overturn the longstanding guarantee of citizenship for “all persons born or naturalized in the United States,” applying a novel reinterpretation of the clause “subject to the jurisdiction thereof” in the amendment to exempt the children of undocumented individuals and even some legal residents.



The order directed federal agencies to stop issuing citizenship documents to such individuals for births occurring on or after February 19, 2025 and required agencies to provide implementation guidance within 30 days. Shortly after the order was issued, states, advocacy groups, and individuals filed multiple lawsuits challenging its constitutionality. By late March, federal judges in Maryland, Washington, New Hampshire, and Massachusetts had issued nationwide preliminary injunctions, [blocking](#) the order from taking effect while litigation proceeds. The courts cited conflicts with the 14th Amendment and longstanding Supreme Court precedent, notably [United States v. Wong Kim Ark](#) (1898), which affirms birthright citizenship for nearly all individuals born on U.S. soil. Nonetheless, the administration promptly [appealed](#) the four nationwide injunctions federal courts had issued. Given the significance of the issue of birthright citizenship, the Supreme Court [expedited](#) its review and scheduled oral arguments for May 15.

Separately, on March 1, 2025, President Trump signed [Executive Order 14224](#), declaring English the official language of the United States. Even before this action, the EOIR had [rescinded](#) guidance on language access in immigration courts across the country. The president's March 1 order revoked former Clinton administration guidance requiring federal agencies and grant recipients to provide [services in languages other than English](#).

The executive order eliminates federal funding for translation services, affecting the approximately [68 million Americans](#) who speak a language other than English at home, according to recent census data. Language access experts and advocacy groups have [condemned](#) the official language declaration, arguing that the order will [erode](#) access to health care, education, legal services, and [emergency information](#) for limited English speakers.

Importantly, the executive order cannot override statutory and constitutional protections for language access. Title VI of the Civil Rights Act of 1964 and other federal statutes [continue to require](#) recipients of federal funding to provide meaningful access to services for individuals with limited English proficiency, and courts consistently have interpreted discrimination on the basis of language as a form of national origin discrimination. In addition, the executive order does not affect state, territorial, or tribal laws that mandate language access, nor does it change constitutional requirements for due process and equal protection. [Previous efforts](#) to name English as the official language centered around legislation or a constitutional amendment, raising questions about the impact and legality of the administration's unprecedented action.

### ***Key Actions:***

- Issued Executive Order 14160 to limit birthright citizenship for children of undocumented immigrants and noncitizens on temporary visas. However, this order was blocked by multiple federal court and the Supreme Court is scheduled to hear the case in late April 2025.
- Issued Executive Order 14224, designating English as the official language and revoking requirements for multilingual federal services.

### ***Impacts:***

- Potential for an increase in undocumented children if birthright citizenship restrictions are upheld.
- Elimination of federal funding for translation services, affecting millions of limited-English speakers.
- The English-language executive order is largely symbolic in effect, as it cannot change statutory or constitutional requirements for language access.
- Ongoing legal and policy uncertainty for millions of Americans as challenges move through the courts.

## **XII. Conclusion**

With an unprecedented series of executive actions, policy changes, and enforcement directives, the first 100 days of the second Trump administration have signaled a profound transformation of the U.S. immigration system. From the militarization of the border to the expansion of interior enforcement, from the dismantling of humanitarian pathways to reductions in the number of immigration judges and immigration court personnel, these changes have touched virtually every aspect of immigration policy and practice.

While the administration has achieved record-low border encounters and expanded enforcement capacity, it also has faced significant operational, legal, and fiscal constraints in pursuing its ambitious deportation goals. Court challenges have temporarily blocked several key initiatives, including the termination of parole programs, Temporary Protected Status revocations, and the executive order on birthright citizenship. Meanwhile, the human impact of these policies continues to unfold, with hundreds of thousands of immigrants, refugees, and asylum seekers — and their employers, schools, churches, and broader communities — facing an uncertain future.

As the administration moves beyond its first 100 days, the gap between policy ambitions and operational realities remains substantial. The success of its enforcement agenda will depend largely on congressional funding, litigation outcomes, and the practical challenges of implementing large-scale deportations. For immigrant communities, service providers, employers, and local governments, navigating this rapidly changing landscape presents ongoing challenges that likely will persist throughout this administration.

The coming months will reveal whether these initial actions represent the high-water mark of the administration's immigration agenda or merely the opening chapter in a more comprehensive transformation of America's immigration system.