

Table 1
I-765 - Application for Employment Authorization
Eligibility Category: C08, Pending Asylum
Initial Permission to Accept Employment
Completions by Processing Time Buckets
August 1, 2020 - December 31, 2025
Aggregated by Fiscal Year and Month
Potential *Rosario* Class Members



U.S. Citizenship
and Immigration
Services

Period		Processing Time (in Days)						Compliance Percentage	
Fiscal Year	Month	0-30	31-60	61-90	91-120	121+	Total	% Completed within 30 Days	% Completed within 60 Days
2023	OCT*	3,573	10,484	22,722	239	183	37,201	9.6%	37.8%
	NOV*	3,928	14,897	12,294	273	411	31,803	12.4%	59.2%
	DEC*	5,446	169	31,894	96	293	37,898	14.4%	14.8%
	JAN*	11,259	12,066	30,681	807	692	55,505	20.3%	42.0%
	FEB*	9,669	28,291	18,684	767	532	57,943	16.7%	65.5%
	MAR*	28,095	45,015	7,934	568	506	82,118	34.2%	89.0%
	APR*	39,038	27,952	18,495	2,092	407	87,984	44.4%	76.1%
	MAY*	77,120	19,953	11,323	1,931	523	110,850	69.6%	87.6%
	JUN*	82,758	9,192	900	342	587	93,779	88.2%	98.0%
	JUL*	75,849	7,030	860	433	581	84,753	89.5%	97.8%
	AUG*	73,247	5,720	614	253	676	80,510	91.0%	98.1%
	SEP*	65,722	6,171	707	295	794	73,689	89.2%	97.6%
	Total	475,704	186,940	157,108	8,096	6,185	834,033	57.0%	79.5%
2024	OCT*	82,593	7,620	542	147	434	91,336	90.4%	98.8%
	NOV*	89,782	4,822	692	324	426	96,046	93.5%	98.5%
	DEC*	78,400	4,739	463	154	432	84,188	93.1%	98.8%
	JAN*	94,779	9,265	2,412	780	811	108,047	87.7%	96.3%
	FEB*	95,127	5,225	672	190	367	101,581	93.6%	98.8%
	MAR*	87,803	8,618	427	175	425	97,448	90.1%	98.9%
	APR*	90,850	13,024	611	165	679	105,329	86.3%	98.6%
	MAY*	93,901	9,895	738	277	358	105,169	89.3%	98.7%
	JUN*	82,917	6,040	706	255	256	90,174	92.0%	98.7%
	JUL*	94,568	5,202	613	444	231	101,058	93.6%	98.7%
	AUG*	97,031	5,002	740	235	388	103,396	93.8%	98.7%
	SEP*	105,127	4,727	525	301	339	111,019	94.7%	99.0%
	Total	1,092,878	84,179	9,141	3,447	5,146	1,194,791	91.5%	98.5%
2025	OCT*	117,461	5,703	843	313	607	124,927	94.0%	98.6%
	NOV*	115,447	5,003	462	177	454	121,543	95.0%	99.1%
	DEC*	119,397	5,316	489	211	632	126,045	94.7%	98.9%
	JAN*	123,494	8,290	1,098	327	577	133,786	92.3%	98.5%
	FEB*	98,643	11,578	920	334	758	112,233	87.9%	98.2%
	MAR*	96,937	13,258	796	376	769	112,136	86.4%	98.3%
	APR*	82,496	24,320	3,865	425	681	111,787	73.8%	95.6%
	MAY*	93,854	34,228	9,685	1,898	983	140,648	66.7%	91.1%
	JUN*	106,397	17,742	13,239	3,925	3,881	145,184	73.3%	85.5%
	JUL*	110,025	32,913	9,772	5,758	5,899	164,367	66.9%	87.0%
	AUG*	68,496	28,579	3,085	1,891	4,081	106,132	64.5%	91.5%
	SEP*	54,632	6,638	3,339	2,269	5,980	72,858	75.0%	84.1%
	Total	1,187,279	193,568	47,593	17,904	25,302	1,471,646	80.7%	93.8%

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Potential *Rosario* Class Members



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Services

Period		Processing Time (in Days)						Compliance Percentage	
Fiscal Year	Month	0-30	31-60	61-90	91-120	121+	Total	% Completed within 30 Days	% Completed within 60 Days
2026	OCT*	62,585	15,243	9,327	9,826	24,360	121,341	51.6%	64.1%
	NOV*	72,782	4,938	2,339	1,606	7,483	89,148	81.6%	87.2%
	DEC*	41,718	4,074	1,001	726	2,891	50,410	82.8%	90.8%
	Total	177,085	24,255	12,667	12,158	34,734	260,899	67.9%	77.2%
Grand Total		2,932,946	488,942	226,509	41,605	71,367	3,761,369	78.0%	91.0%

See Notes page for all notes and assumptions.

Table 2
I-765 - Application for Employment Authorization
Eligibility Category: C08, Pending Asylum
Initial Permission to Accept Employment
Pending Cases by Processing Time Buckets
Pending as of December 31, 2025
Potential *Rosario* Class Members



U.S. Citizenship
and Immigration
Services

Period	Processing Time (in Days)						Compliance Percentage	
	0-30	31-60	61-90	91-120	121+	Total	% Pending 0-30 Days	% Pending 0-60 Days
Pending	28,420	4,001	1,896	1,224	9,138	44,679	63.6%	72.6%

See Notes page for all notes and assumptions.

I-765 - Application for Employment Authorization
Eligibility Category: C08, Pending Asylum
Initial Permission to Accept Employment
Notes and Assumptions
Report Date: December 31, 2025



**U.S. Citizenship
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Table 1 Notes:

- 1) The report reflects the most up-to-date data available at the time the system was queried.
- 2) The data reflects initial decisions on an application by the officer only. Reopened cases are excluded.
- 3) Processing time is represented by the elapsed number of days between receipt date to initial decision date.
- 4) Applications with a request for initial evidence will reset the processing time to 0 upon receiving the evidence.
- 5) Applications with a request for additional evidence will have the processing time paused and resumed upon receiving the evidence.
- 6) Postmark date is not generally reportable in USCIS' electronic systems. Received date is used as a proxy for postmark date when defining potential class members.
- 7) Prior to the Feb. 7, 2022 Asylumworks vacatur decision, potential Rosario class members were defined as initial EAD applications received on or prior to Aug. 20, 2020 or received Aug. 21, 2020 or after and, in accordance with USCIS website instructions related to the CASA preliminary injunction, did not pay a biometrics fee and included evidence of CASA/ASAP membership or paid a biometrics fee and included evidence of CASA/ASAP membership. Previously, individuals who paid a biometrics fee and submitted evidence of CASA/ASAP membership were not identifiable in USCIS' systems. USCIS developed an automated utility to detect and classify electronic evidence to establish CASA/ASAP membership. Once the utility identifies the evidence, a flag is used to prioritize and assign CASA/ASAP membership cases for adjudication.
- 8) Prior to the Feb. 7, 2022 Asylumworks vacatur decision, individuals who did not submit CASA/ASAP membership evidence, but did not pay a biometrics fee due to a Request for a Fee Waiver were not included as potential class members.
- 9) All C08 initial applications adjudicated on or after Feb. 8, 2022 are considered potential Rosario class members regardless of CASA/ASAP membership. Note there are two entries for Feb. 2022. The second entry with the asterisk (*) reports the number of applications adjudicated on or after the Feb. 8, 2022 date.

Table 2 Notes:

- 1) The report reflects the most up-to-date data available at the time the system was queried.
- 2) The data reflects initial decisions on an application by the officer only. Reopened cases are excluded.
- 3) Processing time is represented by the elapsed number of days between receipt date to initial decision date.
- 4) Applications with a request for initial evidence will reset the processing time to 0 upon receiving the evidence.
- 5) Applications with a request for additional evidence will have the processing time paused and resumed upon receiving the evidence.
- 6) All C8 initial applications pending on or after February 8, 2022 are considered as potential class members regardless of CASA/ASAP membership.

Parameters:

Form(s): I-765
Class Preference(s): C08
Initial RFE Codes: FBA, FBC, 109, 1436, 1438
Additional RFE Codes: FBB, 1437
RFE Received Codes: HA, 110
ELIS Base Fee Code : E