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CHNV Update: Revocations and USCIS Guidance Trigger Urgent Employer Action

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The Trump administration terminated the Cuba, Haiti, Nicaragua, Venezuela parole (CHNV parole) program on June 12, 2025. See our initial guidance [here](#). According to the administration, notices have been sent to affected parolees advising:

- Their status has been terminated,
- Their employment authorization documents (EADs) have been revoked—“effective immediately,” and
- They are expected to leave the country (self-deport).

What This Means for Employers

The decision to immediately, and without warning, terminate the CHNV parole program that involves 530,000 participants, creates urgent compliance and workforce implications for employers.

Initially, the administration provided guidance only to affected parolees. Then, late on Friday, June 20, 2025, U.S. Citizenship & Immigration Services (USCIS) sent employers enrolled in E-Verify a notification (E-Verify Notification) outlining the option to access a “new report to help . . . identify if any of [their] E Verify cases was created with an EAD that has been revoked.” USCIS added, “The report contains the document revocation date, case number, and A number for each affected case” (EAD Report).

The USCIS notice also stated, “The data in this report will be regularly updated as DHS revokes EADs, and this report replaces the use of Case Status Alerts for EAD revocations.” The notice advised E-Verify employers to log in to their E-Verify accounts to access the reports and to take the following compliance steps:

Use Form I-9, Supplement B, to immediately begin reverifying each current employee whose EAD the Status Change Report indicated was revoked, and complete all reverifications within a reasonable amount of time.

The employee must provide unexpired

documentation from List A or List C of the Lists of Acceptable Documents. Do not reverify identity documents (List B). During this process, you must allow employees to choose which acceptable documentation to present for reverification. You may not accept the now-revoked EAD, based on the Status Change Report, even if that EAD appears unexpired. You cannot continue employing a person who does not provide proof of current employment authorization.

Most employers, of course, are not enrolled in E-Verify. And even employers that are enrolled in E-Verify may feel some hesitation about relying on guidance from USCIS when Homeland Security Investigations (HSI) and Immigration & Customs Enforcement (ICE) are taking such an aggressive approach to worksite enforcement.

In this enforcement-heavy environment, when the administration has declared immigration-related offenses are the “investigative and charging priorities,” employers would be prudent to take affirmative steps to prepare for the reality of losing these workers. Employers should take the following steps:

1. Check employment records and determine which employees may have been affected by this sudden development and the loss of employment authorization (Category C11). The government's recent publications on this subject should be construed as placing employers on notice that employees from the four affected countries, with CHNV parole, may no longer have employment authorization.
2. Once employers have identified the affected employees, they should meet with each employee, ask whether they have received revocation notices from the government, and if so, ask whether they have alternative evidence of employment authorization from the List of Acceptable Documents.
3. Employees with a different form of employment authorization (e.g., EAD with the Category C08 [asylum applicant], EAD with the Category C09 [green card applicant], etc.) should be given the opportunity to update their I-9 Form. Employers should complete Supplement B (formerly known as Section 3) to finalize the update.
4. Affected CHNV employees whose status has been revoked, and who do not have alternative forms of employment authorization, should be informed that their employment with the company will need to be terminated (unless the administration changes course on this decision). In many instances, employees may simply volunteer that their EADs have been revoked. Employers not

enrolled in E-Verify may check card numbers (usually starting with “IOE” on the front side of EADs) to determine whether EADs have been revoked here: [government website](#).

5. Many employers are wondering when they need to terminate the employment of employees whose EAD has been revoked. Unfortunately, USCIS has not (yet) answered that question, stating in the E-Verify Notification only that employers must “complete all reverifications within a reasonable amount of time,” and adding that employers “cannot continue employing a person who does not provide proof of current employment authorization.”

Because HSI and ICE typically allow employers up to 10 days to resolve issues identified during I-9 audits, one interpretation applying the same timeframe would seem to offer a “reasonable amount of time” for purposes of addressing this unexpected and sudden development. While some employers are taking a more expansive approach that the 10-day clock began on June 12 (when USCIS published its initial notification), others (at least, those employers enrolled in E-Verify) consider the clock began when they **received** the notifications through E-Verify.

We recognize the action of terminating employment within 10 days of receiving notice (however 'notice' is approached) may be construed as overly cautious. Nonetheless, from the perspective of Department of Homeland Security (DHS)—the parent agency of USCIS, HSI, and ICE—employers have a duty to monitor their workforces. With widespread publicity that the CHNV parole program has been terminated, and the new information from the E-Verify Notification, DHS and its subagencies would almost certainly take the position that employers are on notice (actually or constructively) about the loss of status of these parolee employees. With these new developments, failure to take affirmative steps (including termination of employment) in a timely manner could lead to significant legal consequences.

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