

Federal Motor Carrier Safety Administration

November 26, 2025

Re: "Restoring Integrity to the Issuance of Non-Domiciled Commercial Drivers Licenses (CDL) [Docket No. FMCSA-2025-0622]"

To Whom It May Concern:

We write to oppose the new immigration status-related restrictions in the Interim Final Rule (IFR), effective September 29, 2025, titled "Restoring Integrity to the Issuance of Non-Domiciled Commercial Drivers Licenses (CDL)."

I. Interest in the Rule

The undersigned organizations represent some of the nearly 200,000 immigrants who are at risk of losing their livelihoods because of this decision. We are concerned about the impact that this policy could have on the populations we serve, which include refugees, asylees, and humanitarian parolees, as well as other populations of humanitarian concern.

Church World Service (CWS) is a global humanitarian organization that for nearly 80 years has worked toward a vision of a world in which all people have food, voice, and a safe place to call home. Representing nine million people of faith across 14 faith-based organizations and denominations, CWS equips immigrants and the communities that welcome them with the resources they need to thrive. Through refugee resettlement offices, home study and post release services for children, and integration support for newcomers, CWS has a vested interest in ensuring our clients can be self-reliant in their new homes.

The International Rescue Committee (IRC) is dedicated to helping refugees whose lives and livelihoods have been shattered by conflict and disaster to survive, recover, and gain control of their future. The IRC is one of the leading providers of services for refugees, asylees and asylum seekers, humanitarian parolees, survivors of trafficking, and other vulnerable immigrants in the United States. The IRC's economic empowerment programs support low-income individuals and families—including refugees and immigrants—in building financial stability, including services designed to help clients enter and advance in the workforce, strengthen their financial well-being, and pursue entrepreneurship.

Orel Alliance is a charitable organization founded in April 2024 in Omaha, Nebraska, with a goal of supporting both newly arrived Ukrainian families, as well as established families, with ongoing needs.

Refugee Council USA (RCUSA) is the only national coalition devoted to forcibly displaced people in the United States. RCUSA consists of more than 40 members, including the national resettlement agencies as well as other

organizations that directly serve refugees, newcomers, and immigrant populations affected by this rule change.

The U.S. Committee for Refugees and Immigrants (USCRI) is a nongovernmental, not-for-profit international organization dedicated to addressing the needs and rights of refugees, immigrants, unaccompanied children, asylum seekers and asylees, returnees, human trafficking survivors, and other vulnerable populations. Since the inception of the U.S. refugee program, USCRI has worked with the U.S. government to resettle more than 400,000 refugees. USCRI has supported many of these refugees in becoming self-sufficient through finding work as truck drivers, construction vehicle operators, or school bus drivers.

World Relief is a global Christian humanitarian organization founded in 1944 in the aftermath of World War II by the National Association of Evangelicals. Its mission is to boldly engage the world's greatest crises in partnership with the church. Since 1979, World Relief has resettled more than 300,000 refugees and currently offers programs to encourage family integration to refugees, asylees, survivors of human trafficking, and other immigrants in the United States, many of whom will be impacted by the IFR. World Relief has helped numerous humanitarian immigrants along the pathway to receiving their CDLs. For example, World Relief's Chicagoland office has helped over 100 immigrants become fully certified as CDL drivers, allowing them to support their families. Due to the rule change, approximately 60 of these drivers will be ineligible to renew their licenses.

As a result of the IFR, our clients are facing imminent harm.

II. The IFR Removes Lawful U.S. Residents, With Valid Work Authorizations, from the Trucking Workforce

To operate a commercial vehicle, such as a freight truck or school bus, an individual is required to obtain a CDL. Although individual states are charged with issuing CDLs, the process must comply with federal standards.¹ For example, CDL holders are required to pass a written exam and a driving test in order to qualify for the license.

In 2011, the Federal Motor Carrier Safety Administration (FMCSA) decided to limit access to CDLs to U.S. citizens and Lawful Permanent Residents (LPRs).² The FMCSA created a separate category—a *non-domiciled* CDL—for residents of foreign jurisdictions or states prohibited from issuing CDLs. Lawful U.S. residents with a valid work authorization, such as refugees and asylees, could also obtain a non-domiciled CDL.

Now, the FMCSA has decided to limit the issuance of non-domiciled CDLs to H-2A (Temporary Agricultural Workers), H-2B (Temporary Non-Agricultural Workers), and E-2

¹ 49 U.S.C. §§ 31301(4), 31302.

² 76 FR 26854.

(Treaty Investors) visa holders. The effect of this IFR is to render refugees, asylees, asylum seekers, Deferred Action for Childhood Arrivals (DACA) recipients, and humanitarian parolees ineligible for a non-domiciled CDL. As the IFR states:

“An EAD [work authorization] will no longer be sufficient to obtain a non-domiciled CLP [commercial learner’s permit] or CDL...These individuals excluded from eligibility for a non-domiciled CLP or CDL would include asylum seekers, asylees, refugees, and Deferred Action for Childhood Arrivals (DACA) recipients.”³

Refugees and asylees, through a rigorous vetting process, demonstrate that they have a well-founded fear of persecution in their home country. They include Afghans threatened by the Taliban, Uyghurs speaking out against the Chinese government, religious minorities unable to freely practice their faith, and others.

- A **refugee**,⁴ as defined in the 1980 Refugee Act, is an individual who has fled their country and cannot safely return because of a well-founded fear of persecution on account of their race, religion, nationality, membership in a particular social group, or political opinion. Refugees are approved for travel by the State Department and vetted by numerous national security agencies, including the Department of Homeland Security. Only after approval for travel by the United States government are they flown to the United States.
- An **asylee**⁵ is someone who meets the same legal definition as a refugee but sought protection from within the United States or at a U.S. port of entry and has subsequently been granted humanitarian protection.
- A **humanitarian parolee**⁶ is someone who is granted temporary protection in (or permission to enter) the United States because of an urgent humanitarian need or a significant public benefit, such as fleeing war, political instability, or a severe natural disaster.

These individuals will be stripped of their livelihoods because of the FMCSA’s decision. An estimated 194,000 people will be impacted.⁷ Many of these individuals are the sole breadwinners in their families. They have worked hard to freight food that sustains our communities, yet this decision may now prevent them from being able to support their own families.

On November 10, 2025, the U.S. Court of Appeals for the District of Columbia Circuit issued an administrative stay in *Jorge Rivera Lujan v. Federal Motor Carrier Safety Administration*, pausing the implementation of the IFR.⁸ While this has offered

³ 90 FR 46509, 46515.

⁴ 8 U.S.C. § 1101(a)(42).

⁵ 8 U.S.C. § 1158.

⁶ 8 U.S.C. § 1182(d)(5)(A).

⁷ 90 FR 46509, 46519.

⁸ *Jorge Rivera Lujan v. Fed. Motor Carrier Safety Administration*, Nos. 25-1215 & 25-1224 (D.C. Cir. Nov. 10, 2025) (per curiam)

temporary relief to our clients who would otherwise be impacted, we remain concerned about the impact of future implementation.

If not withdrawn, the FMCSA's decision to compel states to revoke their CDLs puts not only our clients at risk of financial devastation, but threatens the stability of an entire economic ecosystem, curtailing their purchasing power, and shrinking economic growth.⁹ Additionally, the truck driving industry is facing steep labor shortages¹⁰ in the aftermath of the COVID-19 pandemic, and immigrant drivers, including refugees, asylees, and humanitarian parolees, have helped keep U.S. supply chains afloat. There are approximately 3.5 million professional truckers¹¹ in the workforce, which skews older—the average age of a trucker is 47.¹² Removing 194,000 CDL holders from an aging workforce leaves the logistics industry less capable to respond to increases in demand for freight.

III. Harm Facing Our Clients

Upon arrival, refugees and other humanitarian populations often find that their foreign qualifications—including medical licensures, law degrees, and engineering certifications—are not recognized in the United States. Driven by the need for financial security and the desire to establish a stable livelihood, refugees and other humanitarian immigrants are often highly motivated to take on demanding jobs.

Because our clients are eager to achieve self-sufficiency, the undersigned organizations frequently encourage them to pursue careers in truck driving, a profession offering strong opportunities for stability and growth. They save for months to be able to pay for CDL training. They are willing to work long hours, manage challenging schedules, and meet the safety standards and other rigorous expectations of the trucking industry. As a result, many of our clients become successful truck drivers who are deeply valued by their employers.

These are some of their stories of success—all names have been changed to protect our client's privacy:

Amir arrived in Atantla, Georgia, as a refugee. After hearing that he dreamed of owning a home, his case manager told him he might earn enough to finance a mortgage if he pursued a CDL. Amir found work as a truck driver and began diligently saving*

⁹ Wendy Edelberg, Guest Essay, *We're Seeing What a No-Immigration Economy Looks Like*, New York Times (Nov. 23, 2025), <https://www.nytimes.com/2025/11/23/opinion/jobs-report-immigration-trump.html>.

¹⁰ Dilip Bhattacharjee et al., Article, *Navigating the Labor Mismatch in U.S. Logistics and Supply Chains*, McKinsey & Co. (Dec. 10, 2021), <https://www.mckinsey.com/capabilities/operations/our-insights/navigating-the-labor-mismatch-in-us-logistics-and-supply-chains>.

¹¹ Press Release, American Trucking Association, *Truck Freight Tonnage and Revenues Rise in 2022, According to Report* (2023), <https://trucking.org/news-insights/truck-freight-tonnage-and-revenues-rise-2022-according-report>.

¹² Abigail Huffman and Dan Murray, *Evolving Truck Driver Demographics: Issues and Opportunities* (July 2025).

towards a down payment. Thanks to his career in trucking, Amir was able to purchase a home for him and his family.

Saif* arrived in the United States in June of 2023 as a refugee and found work as a Lyft driver. Struggling to pay the bills, he studied for his CDL and began working as a truck driver in time for his wife to welcome their baby boy.

Many refugees and other humanitarian populations, after saving some money working as truck drivers, go on to open trucking companies of their own, employing native-born citizens and refugees alike:

Omar,* a young father and former Combat Linguist from Afghanistan arrived in Spokane, Washington seeking safety as a refugee. His service alongside U.S. Special Forces had put him in danger, forcing him to flee the only country he had ever known. Like so many refugees, the journey ahead wasn't easy. Determined to provide for his family and build a future, Omar worked tirelessly in Spokane's transportation industry. In just two years, he built experience, saved, and launched his own transportation services business.

Today, that business helps truckers across the U.S. find top-paying loads, stay on the road, and grow their own livelihoods without the stress of managing logistics. Omar's entrepreneurial success is inspiring, but perhaps even more impactful is how he's paying it forward. His business now serves major clients, including Costco, operates across Washington State, and hires fellow refugees who are starting over, just like he once was. "Problems will always arise," he shared, "but if you work hard and take risks, you'll figure it out and get to where you need to be."

Joe* arrived in the United States as a refugee with no family and no livelihood. He spent months studying to get his CDL, and was excited to begin work as a truck driver after passing the exam. Driving a truck allowed him to save enough money to reunite with his family—including his youngest son, who he had never met before. Recently, he was able to finally purchase his own truck, which will allow him to start his own trucking business.

But many of our clients now fear losing their jobs as a result of the IFR. Having already invested thousands of dollars in training, and with few other jobs that would offer them the pay and satisfaction of trucking, the implementation of the IFR would financially devastate them.

Ali* is originally from Afghanistan and entered the United States in 2023 as a humanitarian parolee, and currently has a pending asylum application. He now lives in California with his wife and child. Wanting a better future for his family, he studied for three months and invested around \$3,000 in training and exams for his CDL. Receiving his CDL was an important milestone for Ali because it opened the door to better job opportunities and allowed him to plan a secure financial future for his family. He was preparing to begin working as a semi-truck driver in November 2025, which would have significantly improved his family's financial stability.

Despite having a valid work permit and meeting all legal requirements, the IFR means that Ali will not be able to use the CDL that he invested time, money, and effort to obtain. “These new regulations feel unfair and discriminatory,” Ali says. “Especially because they block people who are legally authorized to work in the United States from accessing a profession they are fully qualified for. The impact on my livelihood is severe. Losing the ability to work as a truck driver means losing the income that I was depending on to support my wife and child. It has created financial uncertainty, emotional stress, and fear about how I will continue to provide for my family. This abrupt change has disrupted my career plans and placed us in a very vulnerable position, despite my lawful status and full compliance with all state and federal requirements.”

Khalil fled Afghanistan with his father on a Special Immigrant Visa (SIV) after the fall of Kabul in 2021. Khalil's father served the U.S. mission in Afghanistan as a security guard who worked in a zero unit with high-level U.S. intelligence. With the Taliban in power, staying in Afghanistan would be a huge risk for the family. Upon moving to the United States, Khalil picked up work as a truck driver, working long shifts in hopes of one day reuniting with his wife and two children. He has a clean driving record, with no accidents or major traffic violations.*

Too old to become a permanent resident through his dad's SIV process, Khalil had to apply for asylum, which he was successfully granted last year. He has now applied for a Green Card and is waiting to hear back. Hearing about the IFR, Khalil felt he had to quit his job as a truck driver while waiting for his Green Card. His employer, valuing him, wanted him to stay. But the FMCSA's decision caused Khalil to fear he would be stopped by Immigration and Customs Enforcement (ICE) and detained while at work. After being informed of the Administrative Stay on the IFR issued by the DC Circuit Court, Khalil felt comfortable to resume work, but fears what will happen if the stay does not hold.

Kofi, a refugee from the Democratic Republic of the Congo, lives with his wife and three children. He earns \$19.50 per hour at a factory, and his wife works part-time for \$15 per hour. With their combined salaries, they can pay rent and basic necessities, but live month to month. With the help of his resettlement agency, he enrolled in a truck driving school so that he could boost his earning potential. Kofi is an experienced driver and has driven delivery trucks safely across the African continent for many years. He was midway through the four-month program when he learned about the new immigration-related status restrictions on CDLs. Kofi has filed for a Green Card and is waiting for it to be approved and issued. In the meantime, the implementation of the IFR would prevent him from earning a living wage.*

Our Ukrainian clients particularly gravitate towards trucking. Many were admitted to the United States on humanitarian parole under the Uniting for Ukraine (U4U) program. As such, they are eligible to apply for a work permit. However, USCIS delays in processing work authorizations have already threatened their ability to support their families, a situation the implementation of the IFR would only worsen. Many have previous experience driving trucks in Europe, and those who are new to the field quickly develop

the competency needed to operate safely. If this IFR stands, Ukrainian parolees, asylees, and refugees would be excluded from the trucking workforce.

Vlad fled Kharkiv, Ukraine with his wife and child and is currently based in Nebraska. They were able to come to the U.S. under Uniting for Ukraine as humanitarian parolees.*

Before the war in Ukraine, Vlad had been a professional truck driver throughout Europe for 12 years. Upon arrival in the United States, he began working at grocery stores and a gas station, working as much as possible, until he could save enough money to pay for CDL training. He successfully completed the training and received his CDL in summer 2023. Vlad has had no accidents or tickets in Europe and has maintained this clean record in the U.S. Vlad applied for TPS in January 2025 and has also applied for asylum. Both cases are pending. He currently cannot work due to the USCIS delays, as his work permit has not been processed. Vlad had been employed at a trucking company based in Nebraska and continues to make payments on his financed semi truck even while he is unable to work. Vlad's employer would very much like to keep Vlad as an employee, given his excellent safety record and exemplary work ethic.

Vlad does not feel that he and his family can return to Ukraine. Kharkiv is still frequently attacked by Russian forces and drones, and Vlad has no desire to become a Russian citizen. Additionally, their home was destroyed in the early bombings. He wants to maintain a legal status here in the U.S. and has followed all USCIS rules and regulations. Vlad's CDL expires in October 2026, and he is very concerned that he will be unable to drive, and earn income, if the CDL restrictions stand.

Andriy fled to the United States in 2023, seeking refuge from the war with his family. He currently is repatriated under the Uniting for Ukraine program. Andriy supports a large family that includes his wife and two daughters—one of whom was born in the US—as well as his parents and his maternal grandmother. Before he obtained his CDL, he worked hard in the construction sector, specializing in tiling, to support his family. He saved up money for the course and spent two months studying intensively for his CDL, demonstrating full English language proficiency. Immediately after receiving his license, he secured a stable position as a truck driver, providing crucial income to support his household. If this decision stands, Andriy will not be able to provide sufficiently for his family.*

Dmitry, his infant daughter and wife relocated from near the nuclear power facility in Zaporizhia, Ukraine, to Nebraska in 2024. Dmitry previously worked as a police officer and prison guard in Ukraine. When he arrived in the U.S., he began working night shifts at a local gas station. Dmitry saved up \$5,000 to pay for CDL training as many of his friends had found successful careers in trucking. He is currently completing CDL training and worries that he has wasted a significant amount of money and time training for a profession he may not be allowed to work in. Dmitry reads, speaks and understands English nearly fluently and has had no traffic or other citations in Europe or in the U.S.*

Aleksandr is a Ukrainian truck driver who found safety in New Jersey through the Uniting for Ukraine humanitarian parole program. While Aleksandr did not receive notice of a revocation of their non-domiciled CDL, he felt compelled to stop working due to fear caused by the IFR and uncertainty about whether they would be targeted by immigration enforcement while at work.*

Borys arrived through the Uniting for Ukraine program with his wife and daughter. He passed his CDL exams, and began working as a long distance truck driver to support his family. “With the new regulations it will be very difficult, because this is the only income for my family,” he says. “Please let us work.”*

IV. Conclusion

Considering the substantial economic, humanitarian, and operational harms outlined above, we strongly urge FMCSA to rescind the IFR’s immigration-status restrictions. Allowing refugees, asylees, humanitarian parolees, and other lawfully present immigrants with valid work authorization to obtain or renew CDLs is both consistent with federal law and essential to maintaining a stable commercial driving workforce. As the stories we shared testify, our clients take pride in their work as truck drivers, and want to continue working.

Thank you for the opportunity to provide comments on this IFR. Should you have any questions or wish to engage further with the undersigned organizations, please do not hesitate to contact Alexia Gardner at agardner@refugees.org.

Sincerely,

Church World Service

International Rescue Committee

Orel Alliance

Refugee Council USA

U.S. Committee for Refugees and Immigrants

World Relief