

KEY CONSIDERATIONS FOR THE UPCOMING NATIONAL RESIDENT MATCHING PROGRAM

The upcoming National Resident Matching Program is expected to be affected by several recent immigration-related developments under the Trump administration that employers should incorporate into their match planning strategy, including nationality-based travel restrictions, the U.S. Citizenship and Immigration Services ("USCIS") adjudication pause and the \$100,000 fee for new H-1B petitions filed on behalf of candidates who are outside of the United States. Employers should begin preparing early to evaluate risk in the current evolving immigration landscape.

NATIONALITY-BASED TRAVEL RESTRICTIONS AND USCIS ADJUDICATION PAUSE

As of January 1, 2026, there are 39 countries under a full or partial restriction for seeking admission to the United States under the [Presidential Proclamation on Restricting and Limiting the Entry of Foreign Nationals to Protect the Security of the United States](#).

Countries under full suspension of entry for immigrants and nonimmigrants include: Afghanistan, Burma, Chad, Republic of the Congo, Equatorial Guinea, Eritrea, Haiti, Iran, Libya, Somalia, Sudan, Yemen, Burkina Faso, Laos, Mali, Niger, Sierra Leone, South Sudan, Syria and individuals traveling on Palestinian Authority—issued or endorsed travel documents.

Countries under partial suspension of entry for immigrants and nonimmigrants include: Burundi, Cuba, Togo, Venezuela, Angola, Antigua and Barbuda, Benin, Côte d'Ivoire, Dominica, Gabon, The Gambia, Malawi, Mauritania, Nigeria, Senegal, Tanzania, Tonga, Zambia and Zimbabwe. The partial bans restrict entry to the United States on B-1, B-2, B-1/B-2, F, M and J visas.

Additionally, there is a partial suspension of entry for *immigrants only* from Turkmenistan.

In addition, a [USCIS Policy Memorandum](#) subsequently paused the final adjudication of certain immigration benefit requests filed with USCIS by or on behalf of foreign nationals from the 39 countries named in the Proclamation.

Employers can continue to file petitions on behalf of affected candidates; however, decisions on existing and new benefit requests, including H-1B petitions, for affected individuals will be delayed until the pause is lifted.

Employers should be aware that affected candidates will be unable to enter the United States or begin employment until the travel restriction and adjudication pause is lifted. These restrictions may significantly affect onboarding timelines and staffing coverages.

\$100,000 H-1B FEE FOR CANDIDATES OUTSIDE OF THE UNITED STATES

The recently implemented [\\$100,000 fee](#) for H-1B petitions filed on behalf of individuals outside of the United States is also expected to have a significant impact on international residency candidates and sponsoring institutions. The fee applies to all candidates who are abroad and do not currently hold a valid non-immigrant status in the United States. It does not apply to candidates already in the United States in H-1B status who are changing employers or extending their status, nor does it apply to candidates already present in the United States in another lawful status, provided they maintain their nonimmigrant status.

Residency match candidates outside of the United States may be eligible for a national interest exception, although the criteria for the exception are stringent. To qualify for an exception, the Department of Homeland Security must determine that the individual's presence in the United States as an H-1B worker is in the National Interest, that no American worker is available to fill the role, that the alien worker does not pose a threat to the security or welfare of the United States and that requiring the petitioning employer to make the payment on the alien's behalf would significantly undermine the interests of the United States. Notably, there is no current guidance regarding the processing of a request for a national interest exception, making reliance on this pathway highly unpredictable for hiring purposes.

PRACTICAL TAKEAWAYS

Health care employers may experience significant disruptions to the upcoming residency match cycle due to travel restrictions, adjudication delays and increased sponsorship costs. These developments may affect onboarding timelines, staffing coverage, candidate availability and institutional budgeting.

Hall Render's Immigration Team can assist employers in navigating the upcoming National Resident Matching Program. Our team provides ongoing monitoring of policy developments to manage risk and ensure timely onboarding of matched residents as conditions continue to evolve. If you have any questions or need assistance, please contact:

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