

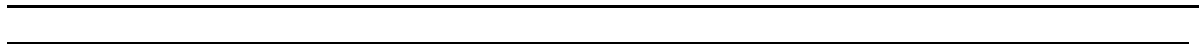
The Honorable Chad F. Wolf
Ms. Sharon Hageman
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Page Two

Pathway programs, and English Language programs or in the U.S. engaging in Optional Practical Training following graduation from a degree program.

USF's international student population makes it possible for our domestic students to discover the world in the classroom and in extracurricular activities. Through partnerships with Students Affairs offices, the Global Citizens Project, and the Graduate School, we offer students opportunities to meet each other and share cultures. This access is important to the understanding of other countries and cultures and creates a

needing an extension, several offices on campus work together to help students identify a successful path to timely graduation. Academic institutions are well suited to manage this process. The proposed rule could interrupt legitimate progress to a degree.

The proposed rule's language to restrict international student enrollment in language training programs to a lifetime aggregate of 24 months (including breaks and an annual vacation) is also concerning and would inhibit many students from completing an English as a Second Language (ESL) program. The length of time students require in ESL programs varies and can extend beyond 24 months. At many institutions, including USF, these students transition from language programs to full-time degree study. There are valid reasons why a student might need more than two years to complete English language study including personal or medical reasons. Under the proposed rule, these students would not be eligible to apply for an extension, even if they have valid reasons for not completing the program in 24 months.



Duration of status as defined in 8 CFR 214.2(f)(5) allows F-1 and J-1 visa holders admission to the U. S. for an unspecific period of time to complete their studies or research. This regulation includes the flexibility necessary for students to pursue their degrees or scholars to engage in research. The proposed rule does not provide an admission period beyond 2 or 4 years. For doctorate programs, for many admission limits are impractical and do not conform to traditional academic program lengths. T

initiatives that focus on risk factors, rather than subjecting entire non-immigrant categories to an expensive, cumbersome, and time-consuming extension of stay process that largely duplicates the efforts that schools and exchange visitor programs will continue to engage in to comply with existing SEVIS reporting obligations.

Our interconnected world and global economy have grown from our efforts to learn about and from each other. Higher education in the U.S. has advanced the human connection by fostering mutual understanding and respect through education abroad programs and inviting international students and scholars to our campuses. Through our efforts, individuals have learned to work together for peace and security. By placing barriers on international students and scholars, we diminish our place in the world and pull away from students, scholars, and researchers who have the ability to contribute to critical knowledge generation. The diversity that we see in our classrooms, our communities, and our workplaces is our strength as a nation.

The uncertainty students will face with regard to degree completion and the additional expenses may discourage many international students from applying to higher education institutions in the U.S., may deter international students and research scholars from accepting offers from institutions in the U.S., and for those who are already here, will make it more uncertain for employers to hire them. If U.S. colleges and universities are unable to provide incoming or prospective students and postdocs with the confidence that they will be able to complete their academic program with said school, these students may decide to study in another country. The U.S. will then lose a critical pipeline of advanced STEM knowledge and talent, potentially to competitor nations.

In conclusion, given the above detailed concerns, USF encourages DHS to maintain the current duration of status model. The proposed rule will create significant procedural uncertainty for international students and universities and damage our nation's ability to attract talented international students, scholars, and researchers. While the proposed rule raises issues of fraud and abuse by a small minority of international students, the creation of