



December 9, 2019

The Honorable Marie Royce
Assistant Secretary, Bureau of Educational and Cultural Affairs
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Dear Assistant Secretary Royce,

As you are well aware, U.S. colleges and universities are part of a worldwide network of learning, research, and education. Our institutions enroll over 1 million students from all over the world in undergraduate, graduate, and professional degree programs. These international students add to the United States' intellectual and cultural vibrancy, while also yielding an estimated economic impact of \$41 billion and support for over 458,000 U.S. jobs.¹

As indicated in the recently released *Open Doors 2019* report², students participating in the optional practical training (OPT) program grew by a significant rate of 9.6 percent. This growth underscores the critical nature of the OPT program to the recruitment and retention of international students and why its preservation is a national imperative. In her comments regarding the *Open Doors 2019* report, Deputy Assistant Secretary Caroline Casagrande said "OPT is one of our greatest strengths. And we know that students value the practical experience that they gain here in the United States and it is one of our most helpful recruitment tools as a reason that a student chooses to study in the United States." Indeed, a recent report from the American Physical Society found that 85 percent of international students say that it is more likely that they will apply to a school if the country it is in provides options to stay and work after graduation.

We know that the Bureau of Educational and Cultural Affairs believes it is important that the U.S. remain a welcoming destination for international students, and that the Bureau understands the educational and economic value of those students in our global standing. However, in order to continue to strengthen our system and attract international students, we see two major problems.

First, there is uncertainty about the future of OPT. There have been persistent rumors and some evidence to suggest that the administration might seek to alter OPT in ways that would make it less attractive or unworkable for international students. Second, there is considerable evidence to suggest that processing times for international students and scholars has slowed. We have seen delays with processing times overall, including for international students seeking OPT, which extended from an average of three months to more than five months.³ As a result, many students returned to their home countries, unable to take the training positions offered to them.

¹ <https://www.nafsa.org/policy-and-advocacy/policy-resources/nafsa-international-student-economic-value-tool-v2>

² <https://www.iie.org/Research-and-Insights/Open-Doors/Data/International-Students/Enrollment>

³ <https://www.insidehighered.com/news/2019/06/25/international-students-applying-work-authorization-face-longer-wait-times>

We believe that one possible way to address these challenges would be for the Bureau to convene a meeting with the Department of Homeland Security and other relevant agencies in hopes of accomplishing these goals:

1. First, to affirm that the OPT program will be maintained in its current form and assure international students who are considering study in the U.S. that the program will continue. We recommend the administration announce its support of OPT and a commitment to leave the STEM extension in place.
2. Second, to find ways to improve visa-processing times for students. We do not seek to undermine a full vetting of a prospective student. Rather, we ask only that the administration commit to doing this more expeditiously.

We would very much like to participate in such a gathering so we could help find solutions to the challenges that have emerged while also ensuring that the nation's security is not compromised in any way. We share a common goal of continuing to ensure that the U.S. remains welcoming to international students and scholars. And given the importance of OPT, as well as ensuring efficient visa processing, to attracting and retaining international students, we hope the State Department will actively work with others in the administration to ensure certainty for international students seeking to study in the U.S. We look forward to continuing to work with you on these important issues.

Sincerely,



Ted Mitchell, President
American Council on Education

Cc: Caroline Casagrande, Deputy Assistant Secretary

On behalf of:

American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
Association of American Universities
Association of Governing Boards of Universities and Colleges
Association of Public and Land-grant Universities
NAFSA: Association of International Educators
National Association of Independent Colleges and Universities