

July 17, 2017

The Honorable John Kelly
Secretary
U.S. Department of Homeland Security
300 7th Street NW
Washington, D.C. 20004

Dear Secretary Kelly:

The undersigned higher education associations and organizations write to express serious concern with the proposed changes that the U.S. Department of Homeland Security (DHS) is considering for the Student and Exchange Visitor Program (SEVP), as reported in the Washington Post on July 10.

The Washington Post reported DHS is considering significant changes that would specifically target foreign students and scholars. Among the troublesome policies under deliberation is a proposal to require students and scholars to reapply annually for permission to continue their program of study or research. If DHS enforces a one-year limit on the duration of time that these international visitors can legally remain in the United States, students and scholars will be forced to annually refile for the validity of their status, or leave the United States and annually file for a visa renewal.

International students and exchange visitors are the most closely tracked travelers in the United States. Institutions and organizations sponsoring international students and exchange visitors are not only required to manage these programs through the Student and Exchange Visitor Information System (SEVIS) database, but also must adhere to reporting requirements that mandate the notification of arrivals, departures, and program changes within set timeframes. The proposed changes under DHS consideration are problematic and do not consider that students and exchange visitors often enroll in U.S. institutions to complete multi-year programs. If an applicant can only be guaranteed duration of status for one year at a time, this will greatly hamper their ability to complete their course of study or transfer programs. When faced with up to a 400 percent increase in fees, redundant forms, and restrictive validity periods, an applicant will likely opt to pursue their studies elsewhere.

As we discussed in April during the Department's Higher Education Roundtable, students, scholars, and researchers from all over the world are drawn to our nation's universities because the U.S. higher education system is widely recognized as preeminent. To the benefit of the entire country, the United States' higher education system attracts some of the world's top talent. We must recognize that the competition for this talent is global, and that now more than ever before, students and exchange visitors have myriad options of where to further their academic pursuits. Policies that excessively restrict international student mobility would inhibit our nation's ability to attract and retain international talent. Such policy changes are particularly problematic given other countries like Canada and Germany are publicly advertising their welcoming policies in an attempt to become the destination of choice. It is imperative that our country's visa issuance

procedures and duration of stay policies are efficient and streamlined, not burdensome and prohibitive.

Foreign students and exchange visitors have long contributed their intellectual capital, academic abilities, cultural vibrancy, and global fluency to the benefit of U.S. students and campus communities. These individuals serve as citizen diplomats and help facilitate cross-border collaborations and cultivate mutual understanding. New proposals subjecting international students and scholars to arduous paperwork, duplicative fees, and redundant monitoring signal that this particular group of international visitors is to be uniquely scrutinized with increased suspicion. Though international students make up only five percent of postsecondary students in the country, they contributed \$32 billion to the U.S. economy and supported more than 400,000 jobs just in the last academic year alone. Our nation greatly risks its ability to remain their top destination of choice if it imposes undue barriers to entry.

We can protect our national security while also having welcoming visa policies that help ensure the United States remains the world's innovation leader. We look forward to continuing to work together on many issues of great importance to DHS and U.S. universities. The importance of these issues requires a robust discussion between the Department, other Cabinet-level agencies, and affected stakeholders. We request the opportunity to comment on any proposed changes. Please consider our organizations a resource to you as the Department considers regulatory changes and new implementation measures.

Please contact Hanan Saab at hsaab@aplu.org and Lizbet Boroughs at lizbet.boroughs@aau.edu with any questions.

Sincerely,

Association of Public and Land-grant Universities (APLU)
Association of American Universities (AAU)
American Council on Education (ACE)
American Association of Community Colleges (AACC)
American Association of State Colleges and Universities (AASCU)
Association of Independent Colleges of Art & Design (AICAD)
College and University Professional Association for Human Resources (CUPA-HR)
Council for Global Immigration (CFGI)
Graduate Management Admission Council (GMAC)
NAFSA: Association of International Educators
National Association for College Admission Counseling (NACAC)
National Association of Independent Colleges and Universities (NAICU)