

## **Comments to DHS on Proposed Removal of Duration of Status**

**DHS Docket No. ICEB-2019-0006**

University of Colorado Denver | Anschutz Medical Campus

Prepared by DSOs/AROs serving our institutions

October 19, 2020

### **Basic Summary:**

The proposed removal of duration of status rule will place an undue cost for F-1 and J-1 international students. This change primarily will disproportionately affect the undergraduate and PhD populations at our university and provide an undue, and possibly burdensome, financial cost. Although we estimate it will not heavily affect our Master's level students, it will still affect them at a lower rate.

### ***Undergraduate:***

Many undergraduate students at our institution are transfer students where they have begun their studies at another institution. This, along with data at our institution points to the fact that many students will take more than 4 years to complete their academic program. According to CollegeSimply.com who provides tracking for U.S. institutions, within 4 year is only 15% for ALL of CU Denver. Within 5 years, 34%, and within 6 years, 40%. These numbers confirm that the majority of undergraduate students do NOT complete their program in 4 years. Our specific data on international students confirms this through reviewing how long it takes our students to complete their academic program. Luckily, International Students do complete at a higher rate than the overall total. We expect that at least approximately 30% of undergraduate students may need to apply for Extension of Status (EOS) during the lifetime of their academic program.

### ***PhD/Doctorate:***

Based on historical data, 100% of our PhD/Doctorate students will be required to complete at least 1 extension of status (EOS) application to complete their academic program. In some instances, they may need to complete multiple EOS applications to complete their academic program. To expect every PhD student in F-1 or J-1 status to complete at least one EOS is an unnecessary and overreaching burden when it is normal if not very common for PhD candidates to take more than 4 years to complete their academic program.

### ***Financial Impact:***

With current filing fees for extension of status at \$370 + \$85 for biometrics, which will likely rise over-time, the financial impact will be individual to each student or scholar. At a minimum each student or will pay these fees, plus if they choose to use outside legal counsel or pay other premium processing fees in order receive the decision in a timely manner the costs could balloon to \$3000 per EOS. This is overly burdensome to many if not ALL students to pay an additional cost to complete their academic programs. Based on previous EOS and Change of Education Level data in the past year we completed around 100 total. 12.5% of the current population applied in the last year, which is based on the current rule on extensions completed only in SEVIS (Student Exchange Visitor Information System). It is expected that the proposed rule could double this number to 200 EOS applications which is around 25% of our F-1 & J-1 student population. Based on the minimum costs

only including fees, this could be a total additional cost of \$91,000 on the low end, with a top cost of \$600,000. These financial costs are alarming and overly burdensome for a population that is charged a premium to study within the U.S. The additional costs to students financially would deter them from coming to the U.S. to study, and put unnecessary pressure to complete their programs faster to not incur additional costs.

Source: <https://www.collegesimply.com/colleges/colorado/university-of-colorado-denver/outcomes/>

### **Basic Summary:**

The proposed rule change puts an undue burden of cost on our J-1 scholar population. 95.6% of our current J-1 scholar population would be affected and have the likelihood of requiring an extension of status to complete their J-1 program within the U.S. Requiring additional scrutiny for a heavily vetted program such as the J-1 program is unnecessary and over-burdensome. With current filing fees for extension of status at \$370 + \$85 for biometrics, which will likely rise over-time, this requires an additional cost to the J-1 scholar and in-turn the university of an additional estimated \$78,000 over the life of the current J-1 population at the university. It is estimated that roughly 20% of our J-1 Scholar population will need to apply for an extension each year. With filing fees for EOS at their current levels this will cost the university and J-1 participants an additional \$15,500 per year. This additional cost will deter and hinder future J-1 participants, and ultimately quell international exchange which is against the mission of the J-1 Program. Most specifically, this new rule will limit the university's ability to conduct high skilled medical research and exchange at our Anschutz Medical Campus.

- Only 4.6% of J-1 Scholars would not be affected by this rule due to participation as a short-term scholar, specialist, or student-intern.
- Possibly 95.6% of ALL J-1 Scholars will likely need an extension of status at some point during their time at our institution.
- An estimated 20% of J-1 scholars would be impacted at an estimated \$13,000/year additional cost in total.

### **2-Year Admission Period**

DHS is proposing a maximum admission period of up to 2 years for certain students and scholars, including citizens of countries with high overstay rates. The overstay information is flawed; a close review of the DHS overstay report shows that CBP uses the Arrival and Departure Information System (ADIS) to generate numbers for this report, and the overstay numbers listed also include "possible overstays", "suspected" overstays, and individuals who have may changed their status while inside the United States. This means the methods used to identify overstays is incomplete and inaccurate. According to Stuart Anderson, the Executive Director for the National Foundation for American Policy (which has published an [analysis and policy brief](#) of the proposed rule), the overstay rates listed in DHS reports should be considered only estimates of those individuals that the government could not identify as having left the United States. Restricting students who are citizens of these countries with "high overstay rates" (primarily countries on the continent of Africa) is discriminatory and will harm our institution's ability to attract a diverse pool of international students and scholars to our campuses.

Students and scholars from countries limited to the 2 year admission period will likely choose not to pursue programs in the United States given the burden of applying for the EOS, which is a financial burden as well as administrative burden; for nearly every degree program at our institution, including all programs at the Baccalaureate or Doctoral level, the standard program lengths are longer than 2 years and therefore all students limited to the 2 year admission period would be required to apply for the EOS at least once in order to complete their initial degree as planned.

### **Enrollment Impact & CPT/OPT Concerns**

The proposed rule will absolutely adversely affect U.S. competitiveness in the international market for nonimmigrant student enrollment and exchange visitor participation as pointed out on page **60573 of the Federal Register**. The educational and experiential benefits of CPT, OPT and STEM OPT for students are valuable and central aspects to the recruitment of students to study in the U.S. International students invest high amounts of money and time in pursuit of higher education in the U.S., and are willing to consider other countries to study if the U.S. does not remain a viable and welcoming option.

- **Bachelor's Public Health:** From my perspective, I think to eliminate the duration of status is unnecessary and can cause more negative outcomes than being useful. Being an international student, I follow the rule and also pay more than double for tuition to be here in the U.S. I believe this rule to change will possibly prevent international students to come to the U.S. This can cause more complications for us. And if this proposed rule get approved it can cause many international students decide to leave. I think to help improve economic and etc, the U.S. should not limited how many years students can stay. Many developed countries in Europe for example, UK is allowed international students to stay longer and more open to job opportunities, which will be good for both students and economy. One thing I want U.S. government to know is being fair, open, no limitation not only for U.S. citizens but also foreign will give you more benefits than being harmful or cause you any troubles. To create complicated during this pandemic will give you no goods. So please do not approve this rule to change.
- **Scholar, Communication & Media Studies:** Firstly, The proposed rule will limit the opportunity international student and visiting scholar to persuade their academic achievement, which make it harder to get a university degree, especially PHD, and to shift their academic major freely. Therefore, the proposed rule would vigorously undermine the attraction of American university to international students, which will weaken American university's competitive strength in international education market and impose financial dilemma to a large number of U.S. university. Secondly, the proposed rule damage the freedom of U.S. high education institution that is high likely cherished by American.
- **Bachelor's Fine Arts (Illustration Emphasis):** Immigration laws in the US are already extremely strict. It is hard enough to get accepted into college and to go through all the paperwork to get a proper education (which we are paying for full price, as international students). Adding extra levels of difficulties to reside for a limited amount of years while pursuing an education only adds stress to students, which is already a very stressful lifestyle. As international students we understand that our time in the US is finite. What is the need to

add unnecessary laws to make it feel like we are a problem, when we are the students with the highest tuition in ALL campuses all over the country.

- **Master's Business Analytics:** New students would be absolutely reluctant in taking up such courses in future due to so many uncertainties around the rules and would find better options for higher studies elsewhere which would eventually result in different forms of revenue losses locally too. I would humbly request to pullback the proposed rules and cancel all the proposals. Please do not put a dark shadow on our future. Thanks!
- **Bachelor's Architecture & Planning:** I think this is pretty messed up what they are trying to do to student that are here LEGALLY and working for a better future. They should be worrying about better things like people here illegally not international students that are here for good purposes. Its not fair for an International Student to be paying all the money we are spending for our education in the USA just for someone to try to take that away from us. We aren't taking anything away from the American people. This needs to stop. I am tired and frustrated of always feeling scared or not even be able to enjoy my days here because of Trump and the Government always threatening student from other countries with these new rules or things they are trying to come up with. This is not going to solve the problem America has. International Student bring so much culture and diversity. Universities with this new plan they are trying to come up with are going to have no International Students at all. Because what's the point of coming here and spending all the money on our education in America if they are going to screw us over? Might as well move to Canada or somewhere else. I am heartbroken to hear this and how badly we are being treated.

While any elimination of duration of status is unnecessary, the proposal of a fixed window of time should look to the dates listed on a student's I-20. This would provide a degree of flexibility for individual institutions to issue I-20s based on the unique requirements and circumstances of their individual degree programs. At the University of Colorado Denver:

- A Bachelor's student is required to complete at least 120 credits to graduate. If an F-1 or J-1 student enrolls full-time (in at least 12 credits every required fall and spring semester), it would take at least 5 years to graduate. As such, students would be in a position in which they would be required to apply for an EOS prior to their final year.
- A Master's student is required to complete at least 30 credits to graduate. If an F-1 or J-1 student enrolls full-time (in at least 6 credits every required fall and spring semester), it would take 2.5 years to graduate. If the student was admitted for a fixed period of 2 years upon their initial entry, they would need to apply for an EOS prior to their final semester.
- A PhD student is required to complete at least 60 credits to graduate. If an F-1 or J-1 student enrolls full-time (in at least 6 credits every required fall and spring semester), it would take a minimum of 5 years to graduate.
- **PhD Cancer Biology:** The duration of status in our I20 allows an international student to finish their degree without having to stress about whether their visa will be expire in the middle of their academic program. A PhD is in itself a very stressful degree which is compounded with the fact that we leave our home and family back home. However, we are made to feel welcome in this new land by all the people around us and our peers. A move where we will have a fixed amount of time (4 years) for pursuing a degree that in it

self always takes 5-6 years, will unfortunately add an extra burden mentally and financially. I understand that there will be a provision for extension, however, we will have to take extra steps in the middle of our academic program to get an extension. In the event that this extension will not be approved, a foreign student might have to leave this degree in which they have invested a large portion of their lives already. It would be unfair for any foreign person entering a country in the hopes of a better education. The school always keeps in check that a student is not taking extra or unnecessary time to finish a degree anyway. They always ensure that a student finishes in the time frame mandated by their program.

So, there is already an authority in check. I urge the government that all foreign students will always maintain the rules and regulations of the country and the institution they are studying in. Kindly, do not add an extra restriction in an already restricted situation.

- **PhD Pharmaceutical Sciences:** As a PhD student this rule directly affects me as per my program website, students on average take 5.5 years to graduate. In such programs, it's hard to tell the time frame required to obtain the degree because research is unpredictable. Like I would run an experiment and depending on the outcomes we proceed. It's not just classes that we need to pass and be done. The time limit would represent an additional stress to an already hard journey. Being a PhD student is stressing as it is, the fact that students like me have to deal with other immigration barriers represent an extra stress that can be avoided. To be honest, I feel targeted like I came to this country to learn but lately it feels like international students are not welcome. PhD applications in US universities are really competitive and if a student gets in, it means that they are exceptional candidates. I think support is needed for such students. We work really hard, research is not a 9 to 5 job, it's a commitment and a passion. Before covid, when we had access to labs without time restrictions, students would work for so long and we really don't need other things to worry about. The current duration of status rule ensures that students are actually working towards their degree especially in graduate programs where we have to maintain certain GPA. So most of us actually have a good academic standing and we need more than 4 years for our research. The US visa process is already through, so I don't really see the point of eliminating d/s.

Prohibiting participation in Curricular Practical Training (CPT) while an Extension of Status (EOS) application is pending will create unnecessary barriers to students being able to complete their program. **On page 60550 of the Federal Register**, DHS proposes to add a sentence at the end of 8 CFR 214.2(f)(10)(i) stating that curricular practical training may not be granted for a period exceeding the alien's fixed date of admission as noted on his or her Form I-94, and that such alien must not engage in curricular practical training until USCIS approves his or her timely-filed EOS request.

- Students who have been limited by 2 or 4 year admission periods who need to apply for an EOS due to needing additional time to complete program requirements - and whose programs require final semester(s) internship requirements - would be prevented from being able to participate in CPT until their EOS application was approved. Should the EOS application not be adjudicated within the necessary timeframe, the student could not be approved for CPT. This would result in delays to students being able to complete their degree requirements and graduate.

- Preventing students from participating in CPT while their EOS application is pending is also a departure from the proposed automatic 180-day extension of on-campus employment and economic hardship authorization while a student's EOS application is pending.

Prohibiting participation in Post-Completion Optional Practical Training (OPT) while an EOS application is pending will create unnecessary delays in students being able to gain valuable work experience in their field of study. **Page 60529 of the Federal Register** points to prohibiting F nonimmigrants whose admission period, as indicated on their Form I-94, has expired while their timely filed EOS applications and applications for employment authorization based on either an internship with an international organization, curricular practical training (CPT), pre-completion Optional Practical Training (OPT), or post-completion OPT are pending to engage in such employment until their applications are approved.

If this rule were to be implemented, students may be waiting on both an EOS application and EAD approval, should timely filed applications not be adjudicated in time by USCIS. Students who are in STEM eligible degrees would also have to apply for an additional EOS application and EAD approval. While the proposed rule would allow for an automatic extension of 180 days of work authorization, this would add additional costs and stress for students until their applications were approved. Students would need to go through the process of applying for multiple extensions throughout their time in the U.S. for each degree they pursued.

- **Masters Business Analytics:** It's really unfair and unfriendly for international student. International students and exchange visitors are the most tracked by ICE. So D/S does not increase the visa overstay. We should be deserved to have a chance to stay in the U.S to work by law. If D/S is eliminated, as an international student, OPT actually becomes nothing. We as an international student deserve a chance to have time to find a job in states.
- **Master's Landscape Architecture:** It is very inconvenient for international students, and there will be obstacles to the confirmation of the current legal status. A large proportion of international students hope to apply for OPT in order to have work experience in the United States, not immigration. This DHS makes it difficult to apply for OPT.
- **Master's Business Analytics:** I came to US to pursue masters in my field of education and if the proposed rules are applied then it would undermine the whole purpose and the way of doing a masters as then I wont be having enough time to get practical knowledge of the subjects and a industry knowhow of things. Once a student gets done with the graduation it is very important to get industry insights and exposure in order to excel in the field. It takes at least a couple of months initially after graduation to find and take up a suitable job. Especially during these hard times of the ongoing pandemic its really hard to find good and suitable jobs, it would be very harsh on students like us to further tighten the duration of status and other proposed rules where in it should be given a bit of relaxation in such times.

### **ESL Student Impact**

The proposed rule by DHS to limit flexibility in duration of status has a particularly punitive impact on English Language Learners. To quote the statement released by EnglishUSA, TESOL, and UCIEP, "English language students are already the most highly monitored non-immigrant F-1 visa holders" and the proposed rule "duplicates the effort that language programs continue to make in order to

comply with SEVIS reporting obligations”. This duplication of effort also serves to undermine years of training by English language professionals, whose work revolves around ensuring students with vastly different goals, learning ability, and backgrounds all achieve proficiency at the rate which is most effective for each student. The proposed time limit of 24 months is also limiting and punitive to students who experience family issues, health issues, economic challenges, natural disasters, or global pandemics, among many other unexpected circumstances.

The 24-month aggregate period of stay fails to address university-bound students who have planned to pursue a degree program immediately following completion of a language program. In addition, it fails to capture the proactive students who are fully admitted to a degree program but attend a language program beforehand to acclimate (or re-acclimate, for students pursuing second degrees) to academic English. This proposed rule does not include any data regarding students who complete language learning programs and go directly into degree programs, nor does it address the way this situation will be treated. According to the most recent Open Doors report, 49% of IEP students intend to continue further study in U.S. higher education systems. As such, the proposed rule is building unnecessary and duplicative barriers between education levels for half of all language learners in the United States as of 2019.

It is not clear how DHS intends to address the transition from a 24-month duration of stay to a degree program duration, especially for students who know this is their path upon visa application. It remains unclear how extensions will be addressed, how long processing will take, and how much it will cost. Not only is the proposed rule lacking in information about duration of study and costs for language learners who intend to study a degree program, but also how this 24-month period will be monitored. Many questions arise about who will monitor this. How does DHS intend to implement the systematic changes needed to access and track this information? Currently, this information is not available for reference by DSOs.

The proposed rule does not serve to solve any existing issue but rather create more issues due to lack in understanding the path of an international student, as well as lack in strategy and well-planned implementation. This proposal creates unnecessary barriers and excessive bureaucratic processes for all related parties, which in turn will naturally lessen the competitive edge of language programs in the United States internationally. This leads back to the point made previously about enrollment decline, job loss, economic hardships, lack of diversity for campus communities, and decreased international relations.

### **Department Impact**

The proposed rule will most definitely make it more difficult and troublesome for departments at our institutions to host international exchange visitors. According to the proposed rule, “J exchange visitors would be able to receive a period of admission not to exceed the program end date as stated on the Form DS-2019, up to a period of 4 years, unless otherwise limited to a shorter period under proposed section 8. Even though we recognize and understand the desire of DHS to be able to more effectively monitor and oversee these categories of nonimmigrants, we would like to voice our concerns on how this change will affect our J-1 exchange visitor program.

The vast majority of exchange visitors that we host are in the research scholar category. Currently, the research scholar category allows for more flexibility in connection with the duration of the program and its extensions, which is essential for the success of our J-1 program. It is imperative to notice that the nature of hosting research scholars is different from the nature of hosting other types of J-1 exchange visitors due to the specifics of the scientific research itself. While this proposed rule might not affect short-term scholars, interns and specialists as much, it will definitely have a substantial adverse effect on hosting research scholars.

Historically, only 4.6% of our J-1 scholars came to the United States as short-term scholars, interns and specialists, minimizing their need for an extension based on their J-1 category, while 95.6% of J-1 exchange visitors would possibly need an extension at some point during their J-1 program based on their category alone. The average program duration for our J-1 scholars is 3.5 years, while their initial DS-2019 is issued for only 1.2 years on average, with an extension request for 1-year period at a time in most cases. Based on current numbers and how J-1s are requested and processed, we estimate that around 58.7% of our research scholars might need 2 extensions to complete their J-1 Program, and 36.6% of our current research scholars might need 1 extension to complete their program if the proposed rule is implemented.

It is also important to note that in some cases short-term extensions are needed, when the scholar's program is extended by 1-3 months only to allow them to complete their programs. If filing the EOS application will be required in these cases, it will most definitely create a disproportionate barrier and will prevent scholars from completing their programs, resulting in unfinished projects and an overall negative experience. In the vast majority of cases, our departments who are sponsoring J-1 exchange visitors in the research scholar category, prefer to initially invite exchange visitors for one year only, and then extend the program one year at a time for up to five years, depending on how the research process is going. This allows for the necessary flexibility in the process as scientific research can be unpredictable. Sometimes the originally proposed duration of stay is not enough due to the complexity of a project, unforeseen circumstances, additional unexpected insights/discoveries that have been made during the program and therefore an extension is required.

For instance, if an unexpected discovery is made by our research scholar, it might be in her/his and their faculty sponsor's best interests to extend the stay of this research scholar in order to advance their discovery further than originally planned. However, if their extension in the U.S. will depend upon an application with USCIS, it will add to the stress and anxiety and take valuable time away from research. Below is a comment from one of our J-1 exchange visitors in the Department of Medical Oncology in our School of Medicine that confirms this statement:

- I think this will create a big dent in the research activities among J1 scholars as their research most probably extend beyond the given time, so if filing for extension includes more paper work, and more waiting time, will be really bad for the research progress. Less time for research more time for paper works.

Consequently, if the proposed rule is implemented, J-1 sponsoring departments will face a dilemma between two options: possibly dealing with the research scholar having to file multiple extensions or



applying for a maximum length of stay from the beginning of the program prior to being able to more accurately predict the length of time that will be needed to complete a particular research project. Both options come with significant drawbacks when compared to the current model allowing for duration of status, one of which is related to financial considerations. Unlike F-1 students who only need to show proof of funds for the first year of their program, J-1 exchange visitors are required to provide proof of funds for the duration of their program at the time that their DS-2019 is created. Therefore, applying for a maximum length of stay from the beginning of the program will require the department to show proof of funds for the entire timeframe, making it more difficult for hosting departments and scholars, especially if funds are not available in full at the time of the original invitation. On the other hand, if the original DS-2019 is issued for a shorter period of time, EOS application fees will need to be considered, putting scholars with multiple dependents and those who might require multiple extensions in a disadvantageous position.

Having to deal with the uncertainty and anxiety that goes with applying for an extension, will not only take away time from scholars' research activities, but will most definitely make them consider other places to conduct their research, which, in turn, will make U.S. based institutions less attractive and competitive in hosting promising international researchers. Moreover, exchange visitors that still choose the U.S. for their research activities, might not choose to extend their stay due to the complications of applying for extensions. All of the above will most definitely lead to great losses in scientific discoveries and international cultural exchange.

Overall, it will make the J-1 program less attractive and unnecessarily more troublesome for its participants and hosts. For instance, at least three labs at the Skaggs School of Pharmacy and Pharmaceutical Sciences would also suffer setbacks in their respective research projects if this rule is implemented. Below is a comment from the Skaggs School of Pharmacy and Pharmaceutical Sciences on this proposed change:

- Overall, the J visa program, with the five-year eligibility, has been a significant component in the success of the school's research enterprise. Candidly, it has also been beneficial from a labor cost perspective as well, while also providing valuable experience to the participants. Given the current and future fiscal impacts of the COVID pandemic, this rule change will have a significant impact because it will mean rising labor costs just at the time when budgets are being negatively impacted. And it will have a detrimental impact on the advancement of the school's research projects, including drug development and drug delivery projects underway in the COVID pandemic vaccine effort. Speaking on behalf of the school, we are not supportive of this rule change.

At present, it is a time-consuming and thorough process that exchange visitor sponsoring departments go through in order to host a J-1 visitor at our University, as well as to extend their program each year. We conduct a detailed review of all the information and paperwork, as well as export control before we approve a potential exchange visitor. While we recognize the DHS effort to prevent gaps in J-1 exchange visitor research work by providing a 240-day extension while the EOS application is pending as indicated on page 60529 of the Federal Register, we still believe that it will

create unnecessary barriers for our exchange visitors and their hosting departments and undermine the goals of the J-1 exchange visitor program itself.

### **Assessment of Staff Hours Required**

In addition to negatively impacting our F-1/J-1 students and J-1 scholars, if enacted, the proposed rule to eliminate duration of status will adversely impact the University of Colorado Denver|Anschutz Medical Campus's International Student and Scholar Services (ISSS) office and staff. The proposed rule requires DSO and RO Rule Familiarization and Adaptation as well as additional time spent by staff members for every extension of status (EOS) application. ICEB-2019-0006 will prove to be a burden to our staff in terms of both time and money. DHS estimates that rule familiarization and adaptation will take 40 hours per staff member (Federal Register, Vol. 85, No. 187, p. 60568). Given this, our office has seven staff members that are DSOs, five of which are also AROs. At minimum, our office will expend, in the first year, the following to adapt to this proposed rule:

- Seven weeks' staff time dedicated to learning, familiarizing, and adapting to the new rule.
- \$11826.58 – 280 staff hours at \$28.93/hour, multiplied by the loaded wage rate factor of 1.46 (the hourly wage and loaded wage rate referenced here are provided in the Federal Register, Vol. 85, No. 187, p. 60569).

In addition, for each individual EOS application, DHS estimates 3 hours for compliance (Federal Register, Vol. 85, No. 187, p. 60583). We anticipate that our staff would need to assist with, at minimum, ~185 EOS applications for our F-1 international students and J-1 international students and scholars each year. This number identifies, based on historical data, an estimate of the number of students and scholars each year who would likely require an extension to complete their program or research, students who would require a change of education level, as well as students from countries who would newly require an extension due to impacts of the proposed 2-year admission rule.

1. At the 3-hour estimate provided by DHS, our office would spend approximately 555 hours (14 weeks) and \$23441 annually on EOS applications each year.

However, in practice, we know that these numbers will likely be higher as, under this proposed rule, students would receive shorter terms on their immigration documents than our University currently observes. So, we can anticipate that students would need to request extensions at higher rates than we see now. Our office can reasonably expect to assist with the EOS applications of 100% of our international students pursuing a PhD, approximately 30% of our international students pursuing an undergraduate degree, and up to 95.6% of all J-1 scholars.

If this proposed rule were enacted, the cost to our office would be an additional burden at a time when our University already faces budget cuts and furloughs due to the COVID-19 pandemic. In addition to the time and resources spent to adapt to the proposed rule and to assist with students' EOS applications, DHS acknowledges that some schools would experience a decline in international enrollment (Federal Register, Vol. 85, No. 187, p. 60562). The expected decline in international enrollment would also prove detrimental to our office, as a majority of the funding that our office

receives comes from student fees. So, it would be expected that our office would expend the necessary resources to adapt and comply to a new rule which would ultimately lead to a decline in revenue to our office.

If this rule passes, this would lead to a decrease in the time that our staff could spend towards other valuable advising, programming, and resources for our international students and scholars. While regulatory compliance is an important function of a DSO's role, the International Student & Scholar Services Office at the University of Colorado Denver|Anschutz Medical Campus is also committed to the wellbeing and success of our students and scholars; it is necessary that our office also have the time and resources to focus on the specific needs of our international students and scholars, especially during a time when there is already so much uncertainty.

### **Comments on the Proposed Rule from Current University of Colorado Denver | Anschutz Medical Campus F-1 Students and J-1 Exchange Visitors (Students and Research Scholars)**

#### **BACHELORS LEVEL F-1/J-1 STUDENTS**

1. **Bachelors Business (Marketing/Information Systems Emphases):** I just think during a virus impact this time, force or changing international students' stay period is really sad. There is nothing an international student can do much. God bless us
2. **Bachelors Fine Arts (Illustration Emphasis):** Immigration laws in the US are already extremely strict. It is hard enough to get accepted into college and to go through all the paperwork to get a proper education (which we are paying for full price, as international students). Adding extra levels of difficulties to reside for a limited amount of years while pursuing an education only adds stress to students, which is already a very stressful lifestyle. As international students we understand that our time in the US is finite. What is the need to add unnecessary laws to make it feel like we are a problem, when we are the students with the highest tuition in ALL campuses all over the country. And choosing to reduce the allowed residing time after graduation to 30 days is an outrageous move. It is already hard enough in this world to find a job, let alone in the pandemic crisis we currently live in. How are we supposed to get hired for our and get all the paper work for our OPT within 30 days, And with the fear of getting deported, strictly for senseless reasons.
3. **Bachelors Business (Management/Information Systems Emphases):** It is sad that the decisions that happen to us as students this year make us under great pressure in our lives. This issue is completely unfair. There are students like my situation fighting for educational achievement despite difficult circumstances. We are shocked by a new decision every time. The tasks must be made easier for his request. Is it possible for 4 years to suffice? This is impossible. Suppose that the student takes at least 12 study units in the course. There is not enough time to attend these classes and the school assignments, especially some of them, take a long time. The student needs at least five years, at least. In general, the student is considered a human being. He should take a rest. Some people are unimaginable even on Saturdays and Sundays. He does homework. Personally, my child is American, but I am not American, so that I will face this problem somewhat on my part. I want to go to food and the shortcomings of the house, I want to take my son out on the weekend with the family, I live my life from gold to the health institute and enjoy the vacation

and a lot, but with these unfair laws, in my view of a student, you will make us under great pressure that cannot bear, unfortunately. I prefer they study everything and watch the side effect.

4. **Bachelors Civil Engineering:** Honestly it makes me feel a bit worried as I have needed that extra time. If this rule was made a few years ago I would of not be able to continue my education nor be a student here at UCD
5. **Bachelors Architecture & Planning:** I think this is pretty messed up what they are trying to do to student that are here LEGALLY and working for a better future. They should be worrying about better things like people here illegally not international students that are here for good purposes. Its not fair for an International Student to be paying all the money we are spending for our education in the USA just for someone to try to take that away from us. We aren't taking anything away from the American people. This needs to stop. I am tired and frustrated of always feeling scared or not even be able to enjoy my days here because of Trump and the Government always threatening student from other countries with these new rules or things they are trying to come up with. This is not going to solve the problem America has. International Student bring so much culture and diversity. Universities with this new plan they are trying to come up with are going to have no International Students at all. Because what's the point of coming here and spending all the money on our education in America if they are going to screw us over? Might as well move to Canada or somewhere else. I am heartbroken to hear this and how badly we are being treated.
6. **Bachelors Civil Engineering:** I do not feel welcomed in this country. I think the trump administration's will is to screw international students in any way possible. They are not helping us focus on our studies, they kept putting obstacles to prevent our success. Your new law is bullshit and does not make sense.
7. **Bachelors Public Health:** From my perspective, I think to eliminate the duration of status is unnecessary and can cause more negative outcomes than being useful. Being an international student, I follow the rule and also pay more than double for tuition to be here in the U.S. I believe this rule to change will possibly prevent international students to come to the U.S. This can cause more complications for us. And if this proposed rule get approved it can cause many international students decide to leave. I think to help improve economic and etc, the U.S. should not limited how many years students can stay. Many developed countries in Europe for example, UK is allowed international students to stay longer and more open to job opportunities which will be good for both students and economy. One thing I want U.S. government to know is being fair, open, no limitation not only for U.S. citizens but also foreign will give you more benefits than being harmful or cause you any troubles. To create complicated during this pandemic will give you no goods. So please do not approve this rule to change.
8. **Bachelors Computer Science:** I prefer more the duration of status than this proposed policy. Approving this policy is making pressure on the students which can affect negatively the academic performance. I feel like the government does not appreciate international students and only think of us as those who overstay after the status expires. Putting a timestamp for education, in my opinion, is not suitable as each individual needs different time to finish their own program. Some take a couple of years to adapt into new language and some do not so 2 years for ESL program is fairly intensive. Moreover, limiting the time of changing the major seems unnecessary

as deciding a major is no other than making a life decision. I believe such changes should not be passed.

9. **Bachelors Communication:** First, I will not choose the USA as the country to finish my PhD degree.
10. **Bachelors Finance:** If the proposed rule to eliminate D/S is approved I'll leave the country. I just want to finish college, but I would like it if I could do it in the US that's why I invested in this education and came here.

### **MASTERS LEVEL F-1/J-1 STUDENTS**

1. **Masters Public Health (Epidemiology Emphasis):** I think eliminating the "duration of status" is very inconvenience to all the international students since we are coming to the U.S. to pursue a degree and during holiday we would want to come home and see our families. During a pandemic right now, we are able to stay in the U.S. even our visa is expired which not just protect ourselves and also everyone. We do not have to take the risk to get infected or spread out the virus during our way home. In general, it also can help student who don't have financial support, do not have to go home and renew their visa but legally stay in the States. I hope the U.S. government can reconsider about this new rule as the new rule will hesitate many new international students and also bring many issues to the current international students.
2. **Masters Business Analytics:** It honestly does not make sense to me as it would only affect students. As it stands, it is really hard to get a working visa in the H1B lottery so I do not see any further reason to make it hard on students who are only trying to study or contribute towards research. International students do not get to take away any jobs from the citizens as such, but rather only contribute to the economy with the tuition fee which is already considerably high as compared to local students. I feel like foreigners are not welcome anymore to the U.S and all efforts are being made to deport the existing ones from the country.
3. **Masters Electrical Engineering:** For me this experience is about learning as much as I can and then try to see how all the things I learned can be used in industry. I am a Master's student and I am working on lots of researches at the moment. I want to have another extra semester to study so I can work on more researches and have as much experience as I can but with this rule it is like I came all this way just to pass some courses and go. I want to see how everything I studied can be used. If there was one thing I could say I would say that the world is facing lots of difficulties because of Covid-19 and as a student there are lots of things on our minds that we need to take care of. Do not make our lives harder than it already is and all of us can try to make a better world for our next generation by working together and without all these limits.
4. **Masters Computer Science:** International students are investing a huge amount in the name of education in USA. For a middle class family like mine it's really tough for parents to send their children higher studies. Although we managed to succeed the first step of our journey, these rules by the US government is creating pressure on International students with time constraints. If this happens it would lead us to depression not only us but our parents too. Hence I request US government to make decisions that benefit everyone and helps to promote US at the Supreme nation.
5. **Masters Computer Science & Engineering:** It's not good for international student as each one of international students pay more than citizen students and some of them do based on loans and as

if visa duration is reduced then it will make no room for students to pay back there loan as they won't be issued a OPT after graduation.

6. **Masters Finance & Risk Management:** I'm currently on my last semester for my Master's program and I just submitted my application for Post-Completion OPT. After reading that the new rule would require students who would like to get an OPT to also file an additional application to extend their stay by submitting I-539 EOS with additional fees, I didn't think that would be fair. Firstly, students applying for OPT already submitted their applications with the respective fees, not to mention the increase in fees as of October 2nd, 2020. By getting their OPTs approved, international students would be joining the American work force. This means that international students are contributing to the American economy by creating wealth by working for American companies, everyday spending in local and American businesses, and by paying taxes as well. Even now it is hard for international students to find and get hired while under OPT. So by requiring international students to apply for an addition application to extend their stay in the country would only further complicate their efforts to get hired in the U.S. with no considerable benefit to the American work force. If the concern is about jobs getting "stolen" by non-American workers, the majority of the people losing their jobs are mainly in non-technical areas and that's mainly due to automation and/or companies trying to reduce costs by outsourcing non-technical labor overseas.
7. **Masters Business Administration:** Some international students may need to I-20 or Form DS-2019 as "duration of status" policy changes. International students who come from listed countries will face shorter years that allow to stay in the US. I'm sympathetic to those international students who come from constrained countries, such as Mongolia, and Vietnam. The new policy doesn't affect me, because my homeland isn't in the list. Please allow such affected student to have time to prepare the change.
8. **Masters Landscape Architecture:** It is very inconvenient for international students, and there will be obstacles to the confirmation of the current legal status. A large proportion of international students hope to apply for OPT in order to have work experience in the United States, not immigration. This DHS makes it difficult to apply for OPT.
9. **Masters Business Analytics:** It's really unfair and unfriendly for international student. International students and exchange visitors are the most tracked by ICE. So D/S does not increase the visa overstay. We should be deserved to have a chance to stay in the U.S to work by law. If D/S is eliminated, as an international student, OPT actually becomes nothing. We as an international student deserve a chance to have time to find a job in states.
10. **Masters Business Administration:** I am graduating in the fall, and am currently an F-1 student. I believe that if you are going to propose a change to the D/S, it should be for those potential students, not current students. That is a massive interruption of our education that we've already paid in to your economy. As an international student, I would not have ventured into American education knowing that this would be the outcome. At the time of my admission to University of Colorado, my intention was to complete my education while living here, to get in-person education, and to work here for 1 year post-graduation. Those were the terms that I entered into my academic career here under, and I don't think it's fair to have those plans interrupted, in consideration of the fact that my legal right currently is to fulfill those plans. Please be considerate of current students, what they have contributed to the universities in this country,

and allow them to complete their current programs of study in-person. These people met all of the requirements for the F-1, and should not have that relinquished mid-program. Thank you.

11. **Masters Public Health:** We came here to pursue opportunities we could not find in our home countries, as the USA is a world leader in education and technology. There are certain educational certifications based in America that are well renowned around the world. These regulations are cruel and unjust, and marginalize many students who pursue their own educational dreams that they could not have in their own home countries. We also can't be expected to pack up our lives the moment we cross the stage after graduation as many of us have had to make our "second home" in the USA. There are also many circumstances beyond a student's control that may extend their programs and students already have to pay a hefty "head tax" to enter the country. I do not agree with this and do not support these new regulations, and also feel that there needs to be more time for public comment.
12. **Masters Computer Science:** The fixed four-year term is notably shorter than the length of a typical Ph.D. program -- and shorter than the time many students take to finish a bachelor program. If the proposed rule were to take effect as written, many students would need to apply for an extension of stay mid-program. It's a totally unnecessary and a massive self-inflicted wound on the United States if it actually goes into effect, I really hope this never does.
13. **Masters Business Analytics:** I came to US to pursue masters in my field of education and if the proposed rules are applied then it would undermine the whole purpose and the way of doing a masters as then I won't be having enough time to get practical knowledge of the subjects and a industry knowhow of things. Once a student gets done with the graduation it is very important to get industry insights and exposure in order to excel in the field. It takes at least a couple of months initially after graduation to find and take up a suitable job. Especially during these hard times of the ongoing pandemic it's really hard to find good and suitable jobs, it would be very harsh on students like us to further tighten the duration of status and other proposed rules where in it should be given a bit of relaxation in such times. New students would be absolutely reluctant in taking up such courses in future due to so many uncertainties around the rules and would find better options for higher studies elsewhere which would eventually result in different forms of revenue losses locally too. I would humbly request to pullback the proposed rules and cancel all the proposals. Please do not put a dark shadow on our future. Thanks!
14. **Masters Computer Science:** Surely the new proposed rule will negatively impact almost all the international students. From my perspective, the most it would impact bearer would be the universities itself. For the students who are looking to gain some real-world experience would surely be a drawback. From what I could tell getting this rule into action may give a huge impact on the financial reserves -- on both the federal and the universities.

### **DOCTORAL LEVEL F-1/J-1 STUDENTS**

1. **PhD Pharmaceutical Sciences:** The elimination of duration of status will not serve the intended purpose of national security and harm research at U.S. universities. First, limiting the flexibility of duration for F-1 visas does not account for the design of doctoral programs. A doctoral dissertation involves many stakeholders, such as research funders (government or industry), professors, and in the realm of healthcare, medical resources. As a doctoral student in a healthcare field, it is rare for people to graduate before their fourth year because so many resources factor in as variables in the timeline. It is very hard to predict when people will

graduate and apply for extension a year or a semester before. Once the U.S. government enacts this rule, there will be a tremendous waste in resources, such as research funding, administrative burden, and medical resource. For example, if my extension of stay is rejected or not approved in time, the research funding I received, the time of 5 faculty mentors and many external collaborators in the healthcare field, and the potential clinical impact my dissertation could make for patients will all be diminished. Even if a student's application is successfully approved, the proposal is still an unnecessary barrier to research and creates a major confusion in the U.S. higher education system, which is already under a great stress. Secondly, the DHS definition "overstays" include those who did not necessarily overstay a visa, but individuals who DHS could not confirm had departed the U.S. If DHS perceives these potential overstays of F-1 and J visa holders who already went through a rigorous initial visa application process as a serious security threat, they should consider the hazard the U.S. will face when more than 12,000 highly qualified foreign national physicians who are providing critical health care services in J-1 visa status or medical researchers under F-1 visa are forced to leave the U.S. because of this restriction during the pandemic

2. **PhD Computer Science & Information Systems:** I am full of stress now! I am here to study and do research. I'm working hard, not less than 10 hours per day. The U.S. government and CU Denver allowed me to pursue my high-level education. So, is it fair to quit me now? I have done with my preliminary exams; all of my course work with a 4.4 GPA. I've published a good paper in 2020 Hawaii International Conference on System Sciences (HICSS). Now, I am doing my best to publish in the best conferences. Please help us to pursue our dreams!
3. **PhD Civil Engineering:** I strongly disagree with the proposed modifications and I believe it will have huge diverse impacts on international students' lives. Many faculty members stopped hiring students after the travel ban, and further difficulties like the proposed one will discourage them to hire international students who are most likely deprived of the education system in their countries. Many students have already sacrificed a lot to be able to study in the US, like not being able to visit parents for 5 years. I appreciate the US administration and I am thankful to this country who gave me this golden chance to have a much brighter future, and I am highly motivated to pay back to this great nation what they gave to me. However, difficulties in obtaining valid visa status, potential risks, and uncertainties about more regulations to come, disappoints us from our decision, and diverge our focus from our study plans. With so many stress amid the pandemic, travel bans, financial difficulties for our parents, limitations on hiring international students for off-campus jobs, and a list of such likes are just too much load for a student to bear.
4. **PhD Economics:** Dear Sir or Madam: I am very fortunate to have been accepted to continue my education at the University of Colorado Denver. This University is very inclusive and welcoming of international students. Not only I have grown to love this community, but I've also grown to love the idea of America which is inclusive and welcoming. Having said that I sincerely believe, this DHS proposed rule will undermine the idea of a welcoming and inclusive nation by adding more bureaucratic loopholes on international students and DHS staff as well. I understand the intention of the proposed rules is the upholding the rule of laws but the consequences will impact the many lives to come for this rule will: 1- Adding more bureaucratic works on students who already deal with the stresses of completing their academic careers. 2- Adding additional costs to the students who have already paid 3 to 5 times more than the domestic students. 3- Adding



uncertainty to student's lives as well as their families. 4- Adding more works on DHS staff. With these in mind, I hope you join me by continuing to uphold this nation's values of being a welcoming/inclusive nation by eliminating these new proposed rules.

5. **PhD Biostatistics:** I think that eliminating D/S, and using the proposed rule is awful. It is hard to complete the Ph.D. program in 4 years, and it makes no sense to let them stop the Ph.D. program if they are already in the program and academically qualified for proceeding the program. If their application for extension is not approved, and they have to stop their program, it will be a waste of time, effort, and money for the university, professors, and the student. There are many promising students who want to pursue a degree in the US. The proposed rule will discourage them. It will be a loss of the US since they might stay in the US and contribute to this country.
6. **PhD Computer Science:** As an international student, I feel embarrassed, sad, anxious as it seems like the government wants more money from international students. I have been doing research in 5 years in the US and now I have to get into things that are unnecessary time and money consumption. It's just terrible if the proposed rule is passed.
7. **PhD Cancer Biology:** The duration of status in our I20 allows an international student to finish their degree without having to stress about whether their visa will be expire in the middle of their academic program. A PhD is in itself a very stressful degree which is compounded with the fact that we leave our home and family back home. However, we are made to feel welcome in this new land by all the people around us and our peers. A move where we will have a fixed amount of time (4 years) for pursuing a degree that in itself always takes 5-6 years, will unfortunately add an extra burden mentally and financially. I understand that there will be a provision for extension, however, we will have to take extra steps in the middle of our academic program to get an extension. In the event that this extension will not be approved, a foreign student might have to leave this degree in which they have invested a large portion of their lives already. It would be unfair for any foreign person entering a country in the hopes of a better education. The school always keeps in check that a student is not taking extra or unnecessary time to finish a degree anyway. They always ensure that a student finishes in the time frame mandated by their program. So, there is already an authority in check. I urge the government that all foreign students will always maintain the rules and regulations of the country and the institution they are studying in. Kindly, do not add an extra restriction in an already restricted situation.
8. **PhD Statistics:** We need to finish our study. We cannot leave without degree.
9. **PhD Pharmaceutical Sciences:** As a PhD student this rules directly affects me as per my program website, students on average take 5.5 years to graduate. In such programs, it's hard to tell the time frame required to obtain the degree because research is unpredictable. Like I would run an experiment and depending on the outcomes we proceed. It's not just classes that we need to pass and be done. The time limit would represent an additional stress to an already hard journey. Being a PhD student is stressing as it is, the fact that students like me have to deal with other immigration barriers represent an extra stress that can be avoided. To be honest, I feel targeted like I came to this country to learn but lately it feels like international students are not welcome. PhD applications in US universities are really competitive and if a student gets in, it means that they are exceptional candidates. I think support is needed for such students. We work really hard, research is not a 9 to 5 job, it's a commitment and a passion. Before covid, when we had access to labs without time restrictions, students would work for so long and we really don't need other

things to worry about. The current duration of status rule ensures that students are actually working towards their degree especially in graduate programs where we have to maintain certain GPA. So most of us actually have a good academic standing and we need more than 4 years for our research. The US visa process is already through, so I don't really see the point of eliminating d/s

10. **PhD Biostatistics:** I feel very concerned about the proposed rule. I have completed a Master's in program in the US with F-1 status, which took 2 years. As I started my Ph.D. program here, which is estimated to be 5 years or more, I will have to apply for an extension and even apply for a second one. As the tension between China and the US grows, I haven't been able to go back to China to visit my family for nearly 2 years because the visa application is sort of limited. And this proposed rule made it worse that I feel very worried if I can complete the program peacefully in the US.
11. **PhD Molecular Biology:** Growing up in Vancouver, Canada I have always seen the US as a place where I have the opportunity to contribute to science in a space that has more diverse job options and training opportunities. Recently, especially since the start of the COVID-19 pandemic, I have felt as though I am no longer welcome in the US regardless of the ways I may contribute to American society. Elimination of the D/S status for individuals on F/J visas would revoke our ability to make meaningful contributions to American science and innovation and bring our unique perspectives and stories to campuses and research labs around the country. As a PhD student, I know it is impossible for me (and other PhD students) to complete our studies on a four year time frame. Limiting the amount of time a student has to complete their program will disrupt productivity, compromise wellbeing and reduce our contributions we make to our labs, universities and science. My lifelong dream is to conduct research in the US and contribute to advances in biomedical science, and revoking D/S will make receiving the training I need impossible. Keeping the D/S rule will allow international students and scholars the chance to come to the US, experience the wealth of opportunities available and allow us to help solve important problems. We want to be here. Please show us that we are welcome, because the impression of the US being a welcoming place to all who seek opportunity is the US we decided to uproot our lives to see what that is like for ourselves.
12. **PhD Neuroscience:** This new rule would have huge negative effects on international students, especially who are pursuing PhD degree here. We all know the time for finishing a PhD program normally requires five years. And it's not uncommon at all that scientific majors, including biology, chemistry and physics, need six to seven years. Elimination of D/S would not only bring us extra challenges to get our degree in a foreign country, but also hurt our passion to study here. U.S is a diverse and inclusive country. However, I couldn't feel either of them except exclusiveness from this proposed rule. I am so disappointed and frustrated on this rule as I couldn't feel any supports to our international students from this country. If this rule get approved, I can tell for sure that I, as well as millions of international students, will have to extend our length of stay and worry about my new application being rejected and not successfully graduating. We have made a huge efforts to come here to pursue our educational development, we do not want to have one more thing that make this path more difficult. I am request a plea here that I wish the government will not pass this rule and maintain the duration of status for us! Thank you!

13. **PhD Mechanical Engineering:** It is not convenient to follow this rule because it is easier to let universities deal with the duration of status. Each case is different and the only one can know about each situation is the university. We are here to learn and we pay in full each semester of our study. I feel bad about why these rules comes now because they affect our lives here and put us under a stress.
14. **PharmD, Doctor of Pharmacy:** Having to pay for an extension stay is peculiar. The rule further limits immigrants. After program ends, we need time to find a job to bring what we study to practice. There are jobs that are harder to find than others. On top of that, there is a waiting period for OPT and completing other documents.
15. **DDS, Doctor of Dental Surgery:** I don't think rule is flexible enough for all students. It makes students stay in the US very unpredictable. For me I will have to apply separate extension for OPT. USCIS is taking very long time to reply > 6months. This is very tedious, time consuming and unpredictable considering the amount of money students put in for their education. This kind of rule is unwarranted, unnecessary and complete waste of time, simply keep on applying for extensions and providing same documents all over again every now and then. I wish that students shouldn't have to go through this, instead of focusing on their careers and future. I am simply not in favor of this proposed rule!
16. **DDS, Doctor of Dental Surgery:** Removing the "Duration of status" would put many international students at risk of being uncertain about whether they will be able to complete their course of study or not. In addition to this, the financial investment that they will be making to the concerned university is usually a huge amount and with this uncertainty, financial risks increase substantially. With everything going on the US, international students are feeling less welcomed into this country and their life is getting harder day by day. Furthermore, I would personally prefer to concentrate on my studies while I am in a course rather than stressing about extensions for stay and concentrating on the process to get it done on time. We, international students, leave our families behind in our home country, live far from them and work really hard to accomplish the financial commitments to the Universities to acquire more knowledge in our field of studies. Therefore, we expect some support from the government of this country rather than making things more hard for us.

#### J-1 EXCHANGE VISITORS

1. **J-1 Scholar, Biomedical Engineering:** I am strongly against this rule. As you know, for most graduate student and postdoc, the students may need more than 4 years to accomplish their degree or training, this will increase the physical and mental burden for millions of students and scholars. At the same time, filing for EOS will create an even larger burden for the USCIS, causing it to slow down even further. The right way to handle the increasing number of nonimmigrants is to create system targeting schools where more overstays happened instead of impractically forcing everyone to file for EOS.
2. **J-1 Scholar, Biomedical Sciences (Researching Type 1 Diabetes):** When we made our choice to come to American to study and research, we believe that American is a country with freedom, equality, and liberty. But in 2020, many things have totally changed, American has become arrogant and closed. More seriously, these bad policies are harming American academia. Scientific research and scientists will be influenced by country borders, and now even influenced by time! If the U.S. government's proposed rule to eliminate "duration of status" (D/S) begins, many studies

cannot be completed in 2-4 years. Students and researchers cannot focus on their job but to worry about their staying ending line. This would be a disaster for American academia.

3. **J-1 Scholar, Medicine:** When you are studying, learning, doing research, etc., it is difficult to predict if you are going to finish your programs on time, since there are several variables that can affect the course of your work or studies. Therefore, eliminating the "duration of status" would negatively affect many current and future international students or researchers.
4. **J-1 Scholar, Biomedical Sciences (Researching Type 1 Diabetes):** This rule will not only affect international students and scholars, but also weaken the strength in science and technology of U.S., if one project is on the way in its 2nd year and the result will be breakthrough in the near future, but the person who target on it have to leave US on his/her 2/5 year limitation, who will lose more?
5. **J-1 Scholar, Medicine:** I think it is unfair that depending on a person's country of birth or citizenship, the length of time in the U.S. could be limited to 2 years instead of 4 years. The duration should be the same for all the international students.
6. **J-1 Scholar, Communication & Media Studies:** Firstly, The proposed rule will limit the opportunity international student and visiting scholar to persuade their academic achievement, which make it harder to get a university degree, especially PHD, and to shift their academic major freely. Therefore, the proposed rule would vigorously undermine the attraction of American university to international students, which will weaken American university's competitive strength in international education market and impose financial dilemma to a large number of U.S. university. Secondly, the proposed rule damage the freedom of U.S. high education institution that is high likely cherished by American.
7. **J-1 Scholar, Medical Oncology:** I think this will create a big dent in the research activities among J1 scholars as their research most probably extend beyond the given time, so if filing for extension includes more paper work, and more waiting time, will be really bad for the research progress. Less time for research more time for paper works.
8. **J-1 Scholar, Biochemistry and Molecular Genetics:** I believe the proposed changes would be detrimental not only to current and prospective student/researchers, but also to the US academic/research field in general. The US have offered an opportunity for countless foreign students/researchers, particularly for countries were such opportunities are not a given. More importantly, the US has benefitted from the bright minds and hard intellectual work of international students and academics, that have brought excellence and prestige.
9. **J-1 Scholar, Pharmaceutical Sciences:** The U.S. government should permit the J1 visa status holders to stay until they complete their project. The limit to a maximum of 4 years of stay in the U.S may interrupt the research plan of some researchers. Especially in the fields of biology and medicine, it takes longer to complete the research plan.
10. **J-1 Scholar, Medicine:** I disapprove of the U.S. government's proposed rule to eliminate "duration of status" (D/S). If the rule is passed, I think many senior intellectual has to leave the USA without completing their project. Now I am a postdoc with J1 visa, I need 5-10 years to finish the project better. If I just stay here for limited years, maybe I can't finish the project. I strongly oppose the new proposal and recommend the DHS and related departments to revise the proposal. The department definitely has the right to "believe" something, but its rule-making needs to be backed by data rather than speculations, especially when making rule changes that would affect well-over a million people's life and cost more than 237 million dollars per year for

the next ten years. The cost will not only come from the non-immigrants' pocket, but also will consume US tax-payer money that can be used to promote other more meaningful projects (e.g., gender/racial equality, education, homelessness) rather than wasted on government paperwork processing. The new rule does not address how having to apply for both the EOS and EAD would affect the current 90-day unemployment rule on Post-OPT participants. It is possible that a student who cannot start working for their employer after receiving their approved EAD merely because of a pending EOS, and once they reached 90-day of unemployment (again, it could take 10 months or more for USCIS to approve EOS), they have to abandon their job offer and leave the US. This not only harms the student, but also hurts the productivity and benefit of the US employer. It is a waste of resources to ask F-1 Post-OPT applicants to file both an EOS and EAD application under the new rule. Asking a student to submit both an EOS and EAD is a waste of money, resources, time, paper, energy.

## **DEPARTMENTS**

1. **Neuroscience Graduate Program:** I am writing to comment on the proposed rule change regarding length of stay for students and scholars. Reducing length of stay permissions will have a detrimental impact on both the training received by international students and the benefits they provide to our research efforts and country. International students and scholars are a centerpiece of US scientific workforce and indeed represent the fact that the US the most sought after and competitive scientific environment in the world. In our PhD program, time to graduate is 5 years, on average. By reducing that arbitrarily and unnecessarily to 4 years it burdens international students, taxes them for contributing to US science, and will reduce US global competitiveness in science. The decision seems arbitrary and punitive against international students and I write to strongly discourage any adoption of reduced length of stay assumptions.
2. **Department of Biochemistry and Molecular Genetics:** These changes will stifle innovation, research, the influx of new talent, etc., all of which have a net negative effect on the economy while providing nothing in the way of national security. This will create additional administrative burden and grow the scope of government, not reduce it, with little or no clear benefit. This will decrease our standing and influence internationally. This will reduce the pipeline of talent into the country, making us less competitive, which is counter to long-term national security, etc.
3. **Department of Biochemistry and Molecular Genetics:** I came here on a J1 visa. Like me, many other faculty and students on our campus and all campuses nationwide. The fact that this administration is willing to use the lives and hopes of those like us, who leave everything behind to chase a dream, as a political prop three weeks from a heated election is both enraging and disgusting.
4. **Skaggs School of Pharmacy and Pharmaceutical Sciences:** Overall, the J visa program, with the five-year eligibility, has been a significant component in the success of the school's research enterprise. Candidly, it has also been beneficial from a labor cost perspective as well, while also providing valuable experience to the participants. Given the current and future fiscal impacts of the COVID pandemic, this rule change will have a significant impact because it will mean rising labor costs just at the time when budgets are being negatively impacted. And it will have a detrimental impact on the advancement of the school's research projects, including drug development and drug delivery projects underway in the COVID pandemic vaccine effort. Speaking on behalf of the school, we are not supportive of this rule change.