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Sharon Hageman, Acting Regulatory Unit Chief  
Office of Policy and Planning  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
500 12th Street SW, Washington, DC 20536

RE: DHS Docket No. ICEB-2019-0006

Dear Acting Regulatory Unit Chief Hageman:

We at Northwestern University join our many colleagues in the American higher-education community opposing the proposed rule, “Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media”, as released from the Department of Homeland Security on September 25, 2020. As sponsor to over 6,500 students and scholars in either F or J status, Northwestern has a strong interest in federal policy relating to international students and visitors.

We have previously written to request extension of the comment period to allow adequate opportunity to identify the many problems in the rule, including, but not limited to the following:

- The arbitrary nature of the proposed rule’s fixed admission period. The fixed two-year and four-year maximum time periods proposed in the rule ignore the federal government’s own statistics on completion of degrees, and are inconsistent with other federal practices. For example, Department of State guidelines allow J-1 scholars up to five years to complete their research in the U.S. Under the proposed rule a large percentage of visa-holders would have to apply for Extension of Stay (EOS). Another arbitrary change is the proposed shortening of the grace period for F-1 students from the current 60-day departure period to only 30 days after completion of study. No justification is provided for reducing the current 60-day period, which from our long experience is the minimum period necessary for graduating students.

- The proposed rule's Extension of Stay provisions are vague and will cause uncertainty for institutions and students. The EOS process is not fully realized in the proposed rule, leaving universities to make assumptions about how the system would be implemented. This is especially worrisome given the increased volume of EOS applications expected under the proposed fixed admission periods. We are also deeply concerned that new EOS provisions give the power of evaluating academic progress to federal immigration officials instead of institutions of higher education. Northwestern has institutional polices to track and evaluate academic progress and how to assess a student's progress in a particular program of study. We do not believe that academic evaluation is or should be the role of U.S. Citizenship and Immigration Services (USCIS).
- The proposed rule would be burdensome to the federal government as well as students and institutions. This new EOS process will create thousands, if not hundreds of thousands, of new applications, and we are concerned that USCIS will be unable to process these in a timely manner. Delays and uncertainty will cause a significant number of international students and scholars to abandon U.S. institutions for those in countries offering clearer paths to degree completion.

We at Northwestern would welcome the opportunity to comment in further detail under an extended comment period, but absent such an extension, we respectfully request that DHS withdraw the proposed rule in its entirety because we believe it is harmful to the long-term interests of our nation.

America's longstanding leadership in science and innovation has depended on our ability to attract and cultivate the best and brightest talent from around the world. The U.S. higher education and research enterprise depends on these visitors' economic, intellectual and cultural contributions. International students and scholars are also important to our state and local economies. During the 2018-2019 academic year, 53,000 international students attended colleges and universities in Illinois, contributing \$1.9 billion to the state's economy and supporting 25,000 jobs. International students and visitors are a vital part of Northwestern's community on our Chicago and Evanston campuses. We urge DHS to reconsider the proposed rule.

Sincerely,



Morton Schapiro  
President



Kathleen Hagerty  
Provost