Northwestern

Northwestern University
633 Clark Street
Evanston, Illinois 60208

Comments on Optional Practical Training Fees Proposal
DHS Docket No. ICEB-2026-0100

November 9, 2026

Northwestern University appreciates the opportunity to comment on the U.S. Department of Homeland Security's proposed rule imposing new fees on participation in the Optional Practical Training (OPT) program. We recognize the importance of maintaining a secure, effective, and accountable immigration system that protects the nation's security and research enterprise, but we do not believe this proposal appropriately addresses these goals.

Northwestern urges the administration to withdraw the proposed fee requirements for people seeking to participate in the OPT and STEM OPT program. Among other effects, the proposed rule would harm the nation's ability to attract and retain highly skilled talent in critical fields, including STEM and healthcare.

International students are important members of a thriving academic community, where the exchange of ideas is enriched by the variety of experiences and perspectives that international and domestic students alike bring to campus. For many international students, OPT is a critical component of the American higher education experience, providing opportunities to apply their academic training in practical settings. New fees that significantly increase the cost of administering or participating in OPT would also increase barriers of participation, making prospective students look more closely at educational options in other countries. Preserving access to OPT helps ensure U.S. universities remain competitive in attracting talented students while supporting a strong pipeline of skilled talent for the nation's workforce. Additionally, a reduction in international student enrollment would diminish the educational experience for all students, as debate of ideas and cross-cultural engagement are important strengths of American campuses.

This proposal also needs to be evaluated in the broader context of evolving federal regulations, including recent Student and Exchange Visitor Program guidance on Curricular Practical Training, the potential elimination of Duration of Status, and potential H-1B visa fees. Taken together, these changes and proposed changes have a negative effect on the ability of American institutions to attract the world's most promising students and have negative downstream implications for the nation's economic competitiveness. Northwestern urges the administration to withdraw the proposed fee requirements for people seeking to participate in the OPT and STEM OPT program.