

PRESIDENTS' ALLIANCE | ON HIGHER EDUCATION AND IMMIGRATION

September 14, 2018

Sharon Snyder
Unit Chief
Student and Exchange Visitor Program
U.S. Immigration and Customs Enforcement
Department of Homeland Security
500 12th Street SW Washington DC 20536

Re: U.S. Immigration and Customs Enforcement Proposed Adjustment of Fees for the Student and Exchange Visitor Program, Docket No. ICEB-2017-0003

Submitted via the Federal eRulemaking Portal at <http://www.regulations.gov>

Dear Ms. Snyder:

The Presidents' Alliance on Higher Education and Immigration submits these comments in response to the notice at 83 *Fed. Reg.* 137, 33762-33794 (July 17, 2018), Docket Number: ICEB-2017-0003, regarding the proposed increases in program fees for the Student and Exchange Visitor Program (SEVP). The new fees, as proposed, represent burdensome and ill-timed increases that will adversely impact foreign students, exchange visitors, and institutions of higher education. The United States has traditionally led the world in educating international students to our country's and the world's benefit. The proposed fee increases put this standing at risk. The Administration's troubling policy changes and rhetoric are already adversely affecting international students and scholars, and these new increases will likely exacerbate the recent trend of declining enrollments of new international students studying at colleges and universities in the United States.

The non-partisan Presidents' Alliance on Higher Education and Immigration is comprised of over 400 presidents and chancellors of public and private colleges and universities, representing over four million students in 41 states, D.C. and Puerto Rico. We are dedicated to increasing public understanding of how immigration policies and practices impact our students, campuses and communities, and supporting policies that create a welcoming environment for immigrant and international students and scholars. Our members' institutions collectively admit and educate hundreds of thousands of international students and recruit many exchange visitors and international scholars. Our members' ability to attract the best and brightest from countries around the world is what enables the United States to flourish as the primary destination for global talent. As documented by NAFSA: Association of International Educators, international students studying at U.S. colleges and universities have contributed greatly to the U.S. economy; NAFSA has estimated that for the 2016-17 academic year, the 1,078,822 enrolled international students contributed \$36.9 billion and supported more than 450,000 jobs to the U.S. economy. These achievements and contributions are now at risk.

U.S. institutions' ability to attract the most talented students and scholars in the world – students whose work helps sustain our academic pre-eminence and who often remain to continue their research or to found or help lead America's most innovative companies – is not foreordained. It is a competitive

advantage that benefits our nation today, but that can be lost to competitor countries and institutions that offer more favorable immigration policies and are eager to build their academic and research prowess and fuel their innovation economies. Our campuses are dedicated to attracting, educating, and graduating students from all backgrounds and places, and our institutions can attest to the vital contributions of international students and scholars on their campuses and in their communities.

The increases would, in some cases, almost double the fees for students (a 75 percent, or \$150 increase for F and M visas and a 22 percent or \$40 increase for J visas) and increase and create new fees for the certification of institutions (a 76 percent or \$1,300 increase for I-17 initial certification, and a new \$1,250 fee for re-certification, which is a recurring fee that schools would be required to pay every two years). We appreciate that the current fee levels may be "insufficient to recover the full cost of activities of current and planned program activities." However, we believe that the extent of these increases are excessive if implemented all at once, and that the announcement was made without sufficient notice to those impacted to accommodate the increases this coming academic year.

To that end, we ask that DHS consider implementing a gradual increase in fees that would allow universities and colleges time to adjust their annual budgets over the course of several years, and enable international students sufficient time to prepare for the increases. The Presidents' Alliance would support reasonable increases in fees, and as determined necessary, the imposition of new SEVP fees in order to sustain SEVP activities and upgrade SEVIS.

Finally, we also want to take this opportunity to endorse and echo the recommendations made in the comment letter submitted by NAFSA regarding these fee adjustments, which included recommendations to reduce the SEVIS fee for short-term study, implement smart enforcement, eliminate site visit fee for new instructional sites, and improve and modernize SEVIS (please see the [comment letter](#) submitted by NAFSA on September 7, 2018 for the full set of recommendations).

Thank you for providing us this opportunity to comment.

If you have any questions or if we can be of assistance, please do not hesitate to contact Miriam (mfeldblum@presidentsimmigrationalliance.org)

Sincerely,

A handwritten signature in black ink, appearing to read "Miriam Feldblum". The signature is fluid and cursive, with a long horizontal stroke at the end.

Miriam Feldblum
Executive Director
Presidents' Alliance on Higher Education and Immigration