



University of California Student Association
1020 12th St., Suite #232
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October 22, 2020

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-2019-0006-0001, Comments in Response to Establishing a Fixed Time Period of Admission and Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media

Dear Ms. Hageman,

On behalf of the University of California Student Association (UCSA), the representative body of the 285,000 students of the University of California system, I am writing to express our strong opposition to the September 25, 2020 proposed rule that would arbitrarily limit international student visa length.

By imposing a fixed length for nonimmigrant F, J and I visas of 4 or 2 years, this proposed rule would directly harm international students at the University of California and colleges nationwide. Under current policy, international students already engage in many acts of accountability, ensuring their visa stay is legal; through a list of non-exhaustive examples such as attending appointments with their international student advisors and reporting their change of physical address to their respective UC campus etc. Under current policy, international students are afforded necessary protections from losing their visa if academic progress is still being made. By removing the duration of status policy, international students would be forced to cut their education short if extenuating circumstances prevent them from graduating a program within four years. Across our ten campuses, only 70% of international students graduate within the four years that this rule would impose¹. Basic needs insecurities, academic struggles, health crises, or a sudden reduction in financial capacity have forced countless students to extend their college careers. If the duration of status policy is removed,

¹ <https://www.universityofcalifornia.edu/infocenter/ug-outcomes>



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international students impacted by these challenges will likely be unable to complete their education and give back to their communities. This measure would also place immense burdens on our international centers to process excessive amounts of paperwork to ensure students are prepared to renew their visas when necessary. In addition, many international students would be potentially subjected to more financial constraints (e.g. inability to acquire more loans).

It is unreasonable for the duration of stay to only last between two to four years when undergraduate and graduate studies typically take a minimum of four years. The proposed renewal process is harshly inconsiderate towards educational access. This renewal process does not take into account how some international students face academic difficulties (e.g. switching majors), they may potentially take more than the proposed minimum of four years to attain an educational degree.

Facing the possibility of losing such important academic flexibility, international students may choose to seek education outside of the United States. A mass exodus of international students would undoubtedly harm colleges and universities across the country. American higher learning institutions benefit from the diverse and rich perspectives of international students in our classrooms. American universities are world-leading in part due to the contributions of those who were not born here but contribute to our educational excellence. This proposed rule change stands in the way of academic excellence and critical research occurring at American universities.

The University of California Student Association strongly urges you to rescind the September 25, 2020 proposed rule. For further questions about our position, please contact our Government Relations Director, Parshan Khosravi, at govrelations@ucsa.org or (916) 442-8280.

Sincerely,

A handwritten signature in black ink that reads "Aidan Arasasingham". The signature is written in a cursive style.

Aidan Arasasingham
President
University of California Student Association