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October 26, 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 12<sup>th</sup> Street SW  
Washington, DC 20536

Re: DHS Docket No. ICEB-2019-0006

Dear Acting Regulatory Unit Chief Hageman,

On behalf of the undersigned organizations, we write with serious concerns and in strong opposition to the proposed rule on “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” (DHS Docket No. ICEB-2019-0006).

America’s colleges and universities are among the finest in the world. They help preserve our democratic values, ensure the country’s economic strength, and contribute to our nation’s influence and global standing. A central reason for the excellence of our postsecondary institutions is their ability to attract and enroll talented, motivated, and curious students, whether born in this country or abroad. This proposed rule will limit the ability of our institutions to recruit and retain these students, as well as J-1 exchange visitors that include scholars, trainees, physicians, and researchers. This is especially unfortunate because the proposed rule is a solution in search of a problem. As detailed below, it is premised on flawed data and is unnecessary because the Student and Exchange Visitor Information System (SEVIS) provides the necessary infrastructure to flag and address issues of noncompliance with immigration laws and regulations.

Some 1 million international students attend U.S. colleges and universities annually, contributing greatly to this country’s intellectual and cultural vibrancy. They also yield an estimated economic impact of \$41 billion and support more than 458,000 jobs across the U.S., not just in higher education. The proposed rule itself recognizes that it will drive international students and exchange visitors to go elsewhere: “While the intent of the proposed rule is to enhance national security, the elimination of duration of status has the potential to reduce the nonimmigrant student enrollment and exchange visitor participation... As a result, nonimmigrant students and exchange visitors may be incentivized to consider other English-speaking countries for their studies.” Given the enormous economic impact of losing international students, instead of creating additional complications and barriers, the federal government should be doing more to encourage international students and scholars to study in the U.S. Other countries, including Canada, the U.K., and Australia, have recognized this great

economic impact and granted further flexibilities for international students during the global pandemic.

In addition, applying these proposed new restrictions to current students during a global pandemic, as our institutions and students grapple with an already complicated academic year, is very troubling. Our comments concern several major issues in the proposed rule, but we also support detailed comments submitted by other organizations which focus on the impact on PhD students, the business community, and medical and health professionals during a global pandemic.<sup>1</sup> In addition, the Department of Homeland Security (DHS) is inappropriately inserting itself into the academic decisions of institutions of higher education, which are in the best position to determine if a student is going to take longer than the prescribed time in a program of study or if that student is making sufficient academic progress.

We also believe the 30-day comment period on this proposed rule is too short given the complexity and the impact on our institutions. We have submitted a letter to DHS asking that the comment period be extended and hope that the agency will grant that request.<sup>2</sup> In the meantime, these comments reflect our best analysis and impact so far. For instance, we are still working to understand how this proposed rule would interact with the DHS policy memorandum regarding accrual of unlawful presence, as a U.S. District Court issued a nationwide permanent injunction against that memorandum in February, 2020.<sup>3</sup>

**Most concerning is the change from the current Duration of Status policy for F international students and J exchange visitors to a fixed admission period for 2- or 4-years maximum.** This proposed limited maximum time period would be largely unworkable for the majority of students, at all educational levels, as well as institutions of higher education. According to the National Center for Education Statistics (NCES), the average time to complete a B.A. for international students is 56.3 months (or 4.69 years). NCES data also shows that 56 percent of international students get their B.A. within four years, compared to only 44 percent of domestic students, so international students already appear to be moving to completion faster than their domestic peers. However, a large population of our international undergraduate students would not complete their degrees within the maximum 4-year prescribed time frame for sundry reasons. Just one example: the NCAA grants student-athletes the opportunity to sit out one year of competition due to injury or for other reasons, effectively providing five years to complete their four years of athletic eligibility. This is also very limiting for students who may want to switch their majors, add an additional minor, or take courses outside of their major, all important aspects that make a U.S. education attractive to international students.

In addition, the majority of PhD-seeking international students take an average of 5.8 years from entering a program to completion, while those who complete the Master's/PhD sequence

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<sup>1</sup> Including comments from the Association of American Universities, the Association of American Medical Colleges, the Association of Jesuit Colleges and Universities, the National Association of Independent Colleges and Universities, other member organizations, as well as the comments submitted by individual colleges and universities.

<sup>2</sup> October 6, 2020 letter to DHS requesting an extension for comments: <https://www.acenet.edu/Documents/Letter-DHS-Duration-of-Status-Comment-Extension-100620.pdf>

<sup>3</sup> <https://www.nafsa.org/professional-resources/browse-by-interest/accrual-unlawful-presence-and-f-j-and-m-nonimmigrants>

take an average of 7.5 years from entering graduate school to completion.<sup>4</sup> Similarly, the rule is largely unworkable for J-1 research scholars who are permitted up to five years by the Department of State to complete their research. Those J-1 scholars would have to apply for at least one Extension of Stay during that 5-year period. The proposed rule would also have a disproportionately negative impact on international students seeking medical training, as well as foreign national physicians participating in U.S. medical residencies and fellowships as J-1 exchange visitors, whose programs can last from one to seven years depending on the medical specialty or subspecialty being pursued. The proposed rule also would have an impact on international scholars seeking postdoctoral research experiences. In some fields, such as the biomedical sciences, the majority of postdoctoral researchers are international.

In addition, the proposed rule causes an undue burden on institutions that offer special programs, such as joint B.A. and Master's degree programs which can be accomplished in a 5-year period, saving the student time and money. Under this proposed rule, those students would have to apply for at least one extension. This is also true for students planning to transition from a 2-year degree to a 4-year degree, transferring from a 2-year program into a 4-year program to complete the degree. When starting at a 2-year college (public or private, not-for-profit) the average time to B.A. is over 5.6 years (or 68.1 months) for international students.<sup>5</sup> Under the proposed rule, these students must apply for an extension following the completion of a 2-year program, and this may discourage those students from pursuing a 4-year degree or from starting their studies at a 2-year institution in the first place. Other examples of joint degree programs pursued by top students are MD/PhD, JD/MBA, etc., or the popular 2+2 programs where students enroll in a community college and are guaranteed admission into a four-year college to finish their degree.

Also of concern, the proposed rule includes a 24-month lifetime aggregate limit for English Language Learners (ELL), which includes academic breaks and vacations. This is incredibly limiting for ELLs, who often transition from language programs into a full-time program of study on the same F-1 visas. In addition, there are many valid reasons why a student would take over two years to complete English language study including personal or medical reasons. Under the proposed rule, these students would not be eligible to apply for an Extension of Stay if they need more than 24 months of language study, even if they have valid reasons for not completing the program in 24 months.

**The proposed rule also severely limits the admission period to a maximum of two years for broad groups of international students and scholars.** The proposed rule would impose a maximum 2-year admission period for broad groups of international students, including from (1) countries with historic overstay rates over 10 percent, (2) countries on the State Sponsor of Terrorism List, (3) countries determined by DHS to limit the period of admission for U.S. national interests, as well as (4) those students attending institutions of higher education which do not fully use E-Verify.

As justification for limiting admission periods for students and scholars from countries with purported historic overstay rates, DHS cites the agency's 2019 overstay report, which has been

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<sup>4</sup> 2018 NSF Survey of Earned Doctorates: <https://www.nsf.gov/statistics/srvydoctorates/#tabs-2>

<sup>5</sup> [https://nces.ed.gov/datalab/index.aspx?ps\\_x=hmcdm9b](https://nces.ed.gov/datalab/index.aspx?ps_x=hmcdm9b)

shown to be based on flawed data.<sup>6</sup> A 2018 article in *Forbes* by Stuart Anderson found that the DHS overstay report (at the time, used to justify the proposed rule on the accrual of unlawful presence of F, J, and M visas) includes individuals DHS was unable to confirm had departed the U.S.”<sup>7</sup> Further analysis of that data found that in 2016, slightly more than half of the reported overstays actually left the country but their departures were not recorded. A September 2020 policy brief from the National Foundation for American Policy found that “the rule relies on a flawed measurement—an overall overstay rate by country that includes individuals who DHS concludes have already left the U.S. and people DHS concedes may have lawfully changed status inside the United States and are not actual overstays.” Ultimately “the DHS ‘overstay’ reports upon which the regulation relies are flawed and misleading for policymaking purposes and should not be the basis for rulemaking on international students.”<sup>8</sup>

In addition, focusing on countries DHS deems to have historically high overstay rates disadvantages countries that send a fewer number of students and exchange visitors to the United States overall, because it is based on the proportional number of overstays rather than the total number of overstays from a specific country. We also note that the initial list of nearly 60 countries with allegedly high overstay rates includes about 30 African countries, and that this proposed rule would have a disparate impact on a continent that is already underrepresented in the U.S.

In regard to the limitations regarding the State Sponsor of Terrorism List, we are concerned this is being broadly applied to students who may have been born in those countries, but are currently citizens of other countries. Those students and scholars may not have any existing ties to their countries of birth. This includes political refugees who may have escaped totalitarian regimes, perhaps at a very young age, and may not have any memories of their birth country. It is unfair to penalize those students and scholars based solely on their country of birth, especially if they do not have any current ties to those countries.

Under Section E, “Requirements for Admission, Extension, and Maintenance of Status of F Nonimmigrants,” DHS also proposes to create a broad new authority that would allow the Secretary of Homeland Security to limit periods of admission to a maximum of two years based on “U.S. national interest.” Under this provision, the Secretary of Homeland Security would have the ability to limit the length of admission for specific fields of study, such as nuclear science, or if the Secretary determines that “U.S. national interests” warrant limiting admission to a 2-year maximum period. This is an extremely broad authority created under a proposed rule and seems to go beyond DHS’s statutory authority. This provision also significantly heightens the uncertainty for prospective international students and exchange visitors, who are often making a significant financial and career investment in coming to the United States for education, scholarship, or research.

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<sup>6</sup> DHS Fiscal Year 2019 Entry/ Exit Overstay Report, [https://www.dhs.gov/sites/default/files/publications/20\\_0513\\_fy19-entry-and-exit-overstay-report.pdf](https://www.dhs.gov/sites/default/files/publications/20_0513_fy19-entry-and-exit-overstay-report.pdf)

<sup>7</sup> <https://www.forbes.com/sites/stuartanderson/2018/06/06/uscis-uses-questionable-overstay-report-to-justify-policies/#3208693566e7>

<sup>8</sup> [https://nfap.com/wp-content/uploads/2020/09/Analysis-of-DHS-Data-on-International-Students.NFAP-Policy-Brief.September-2020-1.pdf?utm\\_campaign=latitude%28s%29&utm\\_medium=email&utm\\_source=Revue%20newsletter](https://nfap.com/wp-content/uploads/2020/09/Analysis-of-DHS-Data-on-International-Students.NFAP-Policy-Brief.September-2020-1.pdf?utm_campaign=latitude%28s%29&utm_medium=email&utm_source=Revue%20newsletter)

And finally, the proposed rule would also impose a 2-year maximum period of admission on students who choose to study at an institution which doesn't use E-Verify. Under the justification, DHS claims that "schools that are willing to go above and beyond to ensure compliance with immigration law in one respect (verifying identity and employment eligibility...and taking the additional step to confirm...using E-Verify) are more likely to comply with immigration law." Through this statement, DHS is implying that schools that do not use E-Verify are in lesser compliance with immigration laws. However, there is no data or hard evidence to justify this severe limitation of a maximum 2-year period for students. Currently, U.S. institutions that accept international students must already be certified by the Student Exchange Visitor Program (SEVP) and that certification process includes: filing the Department of Homeland Security Form I-17; providing required evidence; receiving a school visit from SEVP; and undergoing a comprehensive adjudication process. Once a school is SEVP-certified, schools are continuously monitored through SEVIS for compliance with federal regulations.<sup>9</sup> This proposal also unfairly punishes students for their choice of an institution, based on an employment verification system which has nothing to do with a school's academic program of studies.

**The proposed rule would create a new Extension of Stay process which is uncertain and not guaranteed, as well as expensive and complicated for our students and institutions.** We are extremely worried about the new proposed Extension of Stay (EOS) process. The proposed rule does not even include all the details of how this new EOS process will be implemented and operated. Overall, we are concerned that this new EOS process puts federal immigration officials in charge of evaluating whether a student is making good progress, rather than the institution of higher education, which of course is best suited to make decisions regarding academic progress. Colleges and universities have institutional policies that address academic probation for falling grade point averages, or ultimately dismissal from a program of study. Determining sufficient academic progress is an inappropriate role for the U.S. Citizenship and Immigration Services (USCIS).

This new EOS process is logistically unworkable because of the burden and time to process new applications by USCIS. In 2019, international students experienced longer than normal USCIS processing times for work authorization for Optional Practical Training (OPT), seeing a jump from an average of three months to five months or longer for processing. This created massive confusion for students and institutions, as well as lost opportunities for international students who missed employment start dates and ultimately returned to their home countries. 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. It is unclear how DHS will be able to handle the influx of new applications for EOS as well as additional work such as biometrics for every application in a timely manner.<sup>10</sup>

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<sup>9</sup> [https://studyinthestates.dhs.gov/sites/default/files/SEVP\\_101\\_Transcript.pdf](https://studyinthestates.dhs.gov/sites/default/files/SEVP_101_Transcript.pdf)

<sup>10</sup> The recently passed FY 2021 Continuing Resolution (P.L.116-159) included a framework to allow "premium processing" of EOS applications. At the time of writing this letter, we do not know when or how DHS will implement this process. Even if processing times are reduced, premium processing is a significant additional fee for international students (currently \$1440 for other types of applications).

In addition, there is likely a large cost and burden associated with the EOS application for both the international student and institution of higher education. DHS notes that an institution's extension of a program of study will no longer be sufficient for extending a period of admission. Instead the extension of a program would be used to support a student's EOS application. This is likely to be costly and burdensome for our institutions of higher education, which will need to produce excessive numbers of documents to support student applications. Over the past few years, USCIS has increased the Requests for Evidence requirements for H-1B applications, each of which can cost employers up to \$4,500 in legal expenses.<sup>11</sup> This is also in addition to current SEVIS reporting, as well as the creation of new SEVIS reporting requirements due to this proposed rule. Indeed, the Regulatory Analysis of the proposed rule estimates that institutions will add about 40 hours of staff time up front.

The cost and burden for international students is significant also in time, filing fees, possible legal fees, and travel to biometrics appointments. Travel to biometrics appointments can be expensive and challenging, especially for students in rural areas who may be hours from an Application Support Center. Students may have to submit numerous EOS applications, each of which will incorporate a fee for application (currently \$455). A separate EOS with filing fee is needed for dependent family members. And many institutions do not provide assistance with the EOS process, because they are mindful of possible unlawful practice of law issues. DHS estimates in the proposed rule that the cost of legal assistance for the EOS process would be \$1,047. These additional burdens of time and expense for international students will be additional barriers to recruiting new international students going forward.

This would also have an impact on the very popular OPT program. Students seeking post-completion OPT would have to apply for an EOS as well as employment authorization. According to the proposed rule, these would be separate processes and a student may not engage in post-completion OPT until both the work authorization and EOS are granted. Students will need to trust USCIS to process both applications in a timely manner in order to ensure they can begin their OPT by their start date. Perhaps as important, potential employers will be dissuaded from making offers to international students because of this uncertainty.

And finally, the proposed rule notes that extensions would only be granted at DHS's discretion, based on academic, medical, or other grounds, and denials may not be appealed. In addition, if an EOS application is denied, the international student (as well as his or her dependents) must immediately depart the U.S. For an international student considering a substantial investment in a U.S. education, this will be extremely problematic as they may not be able to finish their program of study, and an extension of their stay will be based on a USCIS officer's understanding of their academic program rather than a decision by their institution of higher education.

**Applying this rule to current students and researchers will cause needless confusion for our international students, scholars, and institutions dealing with**

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<sup>11</sup> NFAP Policy Brief "H-1B Denial Rates: Analysis of H-1B Data for First Three Quarters of FY 2019" <https://nfap.com/wp-content/uploads/2019/10/H-1B-Denial-Rates-Analysis-of-FY-2019-Numbers.NFAP-Policy-Brief.October-2019.pdf>

**the global pandemic.** For the over 1 million current international students and scholars in the United States, this comes at the worst possible time—as they are dealing with the complications of a global pandemic. Colleges and universities are working hard to adjust campuses and operations to enable variations of in-person, blended, and online education, while supporting our students, faculty, and staff during this global crisis. International students have had to deal with great uncertainty during this period, and have made important decisions based on their current status and the current rules governing duration of status. Under the proposed rule, their duration of admission would be limited to the length of their program of study, but for those who may need to leave the U.S. (or are currently outside the country), upon return they would then be subject to the new fixed-term duration of admission. Suddenly imposing a 2-year or 4-year limit of admission on these current students and scholars will cause needless stress, as well as a likely major impact on the larger U.S. economy during a period of economic recovery.

**We are concerned about the impact on students wishing to complete OPT, as well as how this would impact students and scholars transitioning to H-1B and other work authorizations.** Part of the global leadership of U.S. higher education has involved attracting the best and the brightest students from around the world to our colleges and universities. One reason for this is the OPT program, which offers talented international students who complete a U.S. degree the opportunity to remain in the country for a period of time to enhance their educational experience. As noted above, this proposed rule would require students wishing to participate in OPT to apply for an EOS, as well as an OPT work authorization from USCIS. Both would need to be granted in order for the student to start an OPT program. For a student participating in a Science, Technology, Engineering, and Mathematics (STEM) OPT, which allows an additional two years of OPT, this would mean at least one additional extension, which will be expensive and burdensome for these students.

The proposed rule notes that “international students pursuing a business degree in the United States rate opportunities for post-graduation employment, availability of financial aid, and reputation of the school as the most important factors in selecting a university. These factors may outweigh the perceived impacts from the proposed admission for a fixed period.” We strongly disagree. OPT is a critical tool for recruiting students, in all fields, to come study in the United States, but especially for those in the STEM fields. The result of this proposed rule would be to severely curtail OPT, which will substantially lessen the desirability of coming to the U.S.—especially for the most talented students who have other good options. Because of the global competition for international students, competitor countries like the U.K., Canada, and Australia have created and strengthened post-completion OPT programs to attract international students.<sup>12</sup>

In addition, the proposed rule would reduce the grace period for F visa international students from 60 days to 30 days. The existing 60-day time period is important for students transitioning post completion from a program of study, especially those seeking OPT, or for those transitioning to an H-1B post-graduation. A reduction in the grace period will cause undue stress and difficulties for international students, especially those hoping to remain in

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<sup>12</sup> September 11, 2019 *Inside Higher Ed*, “U.K. Policy Expands Work Rights for Foreign Students”  
<https://www.insidehighered.com/quicktakes/2019/09/11/new-uk-policy-expands-work-rights-foreign-students>

the U.S. for approved employment or because they are applying to further educational programs.

We do appreciate that the proposed rule would extend the application time for OPT from 90 days to 120 days. We believe this will be useful for our international students who are working to transition from an academic program into OPT. However, we are concerned that the proposed rule shortens the number of days students have to file an application after the program end date from 60 days to 30 days.

**Expanding the authority and roles of U.S. Customs and Border Protection (CBP) and USCIS is extremely worrisome, as both agencies have had issues handling current processing activities in a timely manner and have created roadblocks for our international students and scholars.** For instance, we have received troublesome reports of students being denied entry while traveling on valid visas for a hybrid program in fall 2020.<sup>13</sup> Before the global pandemic, there were several incidents of students being denied entry by CBP while holding valid visas, and at least in one case a student who had a court order allowing them entry into the U.S.<sup>14</sup> Allowing CBP and USCIS additional authorities, through a rule making process rather than congressional legislation, is extremely problematic and concerning for our institutions, as well as our students and scholars.

**The issues DHS says it is trying to address (security concerns, fraud issues, abuse of the temporary nature of these visa categories) could be addressed through the SEVIS system.** The proposed rule tries to fix problems that are minimal now, if they exist at all, and can be managed through the SEVIS database. SEVIS is managed by the Student Exchange Visitor Program (SEVP), which is part of ICE's Homeland Security Investigations (HSI) directorate, and supports "ICE's mission to protect national security and enforce immigration laws".<sup>15</sup> Those in F and J visa status are already the most carefully monitored group of temporary visitors in the United States, and the only ones tracked by a database.

SEVIS information is shared internally throughout ICE and HSI, as well as with law enforcement, CBP, USCIS, the U.S. Department of State, and the FBI. Institutions of higher education must be granted SEVP certification to accept F international students and there are currently over 10,000 certified schools. In addition, institutions of higher education apply to the U.S. Department of State Bureau of Educational and Cultural Affairs to receive designation as a J sponsor. In turn, SEVIS is used to track, monitor, and update records for J exchange visitors. DHS itself notes that once a school is SEVP-certified, schools are continuously monitored through SEVIS for compliance with federal regulations. Schools that do not comply can lose their certification. To ensure compliance, schools undergo a recertification process every two years.<sup>16</sup> Under SEVIS, an institution currently reports: student name, SEVIS ID, status, status change date, visa class, and program start and end date for all students in Initial and Active status at the school. Schools are also required to keep students' records up to date

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<sup>13</sup> August 12, 2020 higher education association letter to State and DHS: <https://www.acenet.edu/Documents/Letter-CPB-State-Fall-2020-Visa-Guidance-081220.pdf>

<sup>14</sup> <https://www.insidehighered.com/admissions/article/2020/01/27/iranian-student-was-bound-northeastern-was-turned-away>

<sup>15</sup> DHS "SEVP 101": <https://studyinthestates.dhs.gov/2014/01/sevp-101>

<sup>16</sup> [https://studyinthestates.dhs.gov/sites/default/files/SEVP\\_101\\_Transcript.pdf](https://studyinthestates.dhs.gov/sites/default/files/SEVP_101_Transcript.pdf)



by reporting changes in: student or dependent name or address; academic program and status, including early graduation/completion; and disciplinary action taken by the school as a result of a conviction of a crime. It is unclear why DHS is not using existing data to take action to address the concerns about fraud and abuse.

**This will have a devastating economic impact on the larger U.S. economy, as well as institutions of higher education, during the global pandemic.** In the proposed rule, DHS acknowledges the immense economic impact of international students, which was estimated at \$41 billion and supporting over 458,000 jobs across U.S. economic sectors, not just institutions of higher education.<sup>17</sup> In addition, international students, especially graduate students, are essential to supporting teaching and research, which in turn support economic growth, public health efforts, and national security across our country. The potential disruptions graduate students and post-doctoral researchers would face in their own academic and research pursuits would create ripple effects on the undergraduates they teach and the research teams they belong to. After a decade of historic growth in the enrollment of international students, the U.S. has started to see declines in new enrollments, including a 1.5 percent decrease in new undergraduate enrollment and 5.7 percent decrease in non-degree programs.<sup>18</sup> Since the pandemic, initial reports have found a more than 11 percent decrease in international enrollment across U.S. institutions of higher education.<sup>19</sup> At the same time, competitor countries such as Canada, U.K., and Australia have offered greater flexibility to international students during the global pandemic. This proposed rule, coupled with the confusion caused by the July 6 guidance that was proposed and subsequently withdrawn by U.S. Immigration and Customs Enforcement, creates greater uncertainty for international students considering where to study.<sup>20</sup>

**In conclusion, given these grave concerns we strongly oppose this proposed rule and ask that DHS withdraw it.** We believe it is based on flawed data and attempts to address problems that don't exist among our international students and scholars or within the current system. We ask that DHS work with institutions of higher education to address the issues of fraud and abuse raised in the proposed rule, and look to address these issues, to the extent they are shown to exist, using the long-established SEVIS database system. In addition, DHS and the entire federal government should be doing more to support our international students and scholars during this time of global pandemic and economic uncertainty to ensure that the U.S. can continue to attract international students, scholars, trainees, and researchers and to support and strengthen the U.S. education and research enterprise.

Sincerely,

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<sup>17</sup> <https://www.nafsa.org/policy-and-advocacy/policy-resources/nafsa-international-student-economic-value-tool-v2>

<sup>18</sup> 2019 Open Doors report: <https://opendoorsdata.org/data/international-students/new-international-students-enrollment/>

<sup>19</sup> September 24, 2020 National Student Loan Clearinghouse press release: <https://www.studentclearinghouse.org/blog/undergraduate-enrollment-down-2-5-and-graduate-students-up-3-9-compared-to-sept-2019/>

<sup>20</sup> <https://www.ice.gov/news/releases/sevp-modifies-temporary-exemptions-nonimmigrant-students-taking-online-courses-during>



Ted Mitchell  
President

On behalf of:

Academic Consortium for Integrative Medicine & Health  
Achieving the Dream  
ACPA-College Student Educators International  
American Academy of Allergy, Asthma & Immunology  
American Academy of Neurology  
American Association for Anatomy  
American Association of Colleges for Teacher Education  
American Association of Colleges of Nursing  
American Association of Collegiate Registrars and Admissions Officers  
American Association of Community Colleges  
American Association of Directors of Psychiatric Residency Training  
American Association of State Colleges and Universities  
American Association of University Professors  
American College of Clinical Pharmacology  
American Council on Education  
American Dental Education Association  
American Geriatrics Society  
American Indian Higher Education Consortium  
American Neurological Association  
American Psychological Association  
American Society for Biochemistry and Molecular Biology  
American Society for Reproductive Medicine  
American Society of Nephrology  
APPA, "Leadership in Educational Facilities"  
Asociación de Colegios y Universidades Privadas de Puerto Rico  
Association of Academic Psychiatrists  
Association of American Colleges and Universities  
Association of American Medical Colleges  
Association of American Universities  
Association of Bioethics Program Directors  
Association of Catholic Colleges and Universities  
Association of Chiropractic Colleges  
Association of Community College Trustees  
Association of Departments of Family Medicine  
Association of Governing Boards of Universities and Colleges  
Association of Independent California Colleges and Universities  
Association of Independent Colleges and Universities in Massachusetts  
Association of Independent Colleges and Universities of Pennsylvania

Association of Independent Colleges and Universities of Rhode Island  
Association of Independent Colleges of Art & Design  
Association of Jesuit Colleges and Universities  
Association of Medical and Graduate Departments of Biochemistry  
Association of Public and Land-grant Universities  
Association of University Professors of Neurology  
Association of University Professors of Ophthalmology  
Coalition of Urban and Metropolitan Universities  
College and University Professional Association for Human Resources  
Common App  
Connecticut Conference of Independent Colleges  
Consortium of Universities of the Washington Metropolitan Area  
Council for Advancement and Support of Education  
Council for Christian Colleges & Universities  
Council for Higher Education Accreditation  
Council of Graduate Schools  
Council of Independent Colleges  
Council on Governmental Relations  
Council on Social Work Education  
EDUCAUSE  
ETS  
Georgia Independent College Association  
Hispanic Association of Colleges and Universities  
Independent Colleges and Universities of Texas  
Independent Colleges of Indiana  
Independent Colleges of Washington  
International Association of Medical Science Educators  
Kansas Independent College Association  
Louisiana Association of Independent Colleges and Universities  
NAFSA: Association of International Educators  
NASPA - Student Affairs Administrators in Higher Education  
National Association for College Admission Counseling  
National Association for Equal Opportunity in Higher Education  
National Association of College and University Business Officers  
National Association of Colleges and Employers  
National Association of Independent Colleges and Universities  
National Association of Student Financial Aid Administrators  
National Collegiate Athletic Association  
Network of Colleges and Universities, Evangelical Lutheran Church in America  
Oregon Alliance of Independent Colleges and Universities  
Society of Directors of Research in Medical Education  
Society of General Internal Medicine  
State Higher Education Executive Officers Association  
The College Board  
Wisconsin Association of Independent Colleges and Universities