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October 6, 2020

The Honorable Chad Wolf
Acting Secretary of Homeland Security
U.S. Department of Homeland Security
3801 Nebraska Avenue NW
Washington DC 20395

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

Dear Acting Secretary Wolf and Acting Regulatory Unit Chief Hageman:

We write today on behalf of the undersigned organizations to request that you extend the current 30-day comment period for the September 25, 2020, 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) to a minimum of 60 days.

Setting such a brief comment period for a complicated proposed rule is an unreasonably compressed time for affected constituencies to assess, discuss, and meaningfully respond regarding the impact on higher education institutions and our international students. As you are aware, there are currently over 1 million international students and scholars in the United States. These students and scholars contribute greatly to the U.S. economy, as well as the education and research enterprise that helps drive American innovation and industry. The proposed rule would impose complicated new requirements not only on current students striving to navigate their postsecondary education during a global pandemic, but also on future students.

In addition, because of the global pandemic, colleges and universities are working hard to adjust campus operations to enable variations of in-person, blended, and online education, while supporting the health and safety of our students, faculty, and staff. This further underscores that a 30-day period does not allow for a careful analysis to understand and comment on the proposed rule. Given the extraordinary impact of COVID-19 and the complexity of the proposed rule, we respectfully request that DHS extend the comment period to at least 60 days.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell". The signature is fluid and cursive, with the first name "Ted" being more prominent than the last name "Mitchell".

Ted Mitchell, President

On behalf of:

American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
Association of American Universities
Association of Catholic Colleges and Universities
Association of Public and Land-grant Universities
Association of Jesuit Colleges and Universities
Council for Christian Colleges & Universities
NAFSA: Association of International Educators
National Association of Independent Colleges and Universities