

October 7, 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 12<sup>th</sup> Street SW Washington DC 20536

Dear Acting Secretary Wolf and Acting Regulatory Unit Chief Hageman,

On behalf of nearly 500 member colleges and universities comprising the Council of Graduate Schools (CGS), I write to you respectfully requesting an extension of the public comment period for the proposed rule "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). The current 30-day comment period ends on October 26, 2020, and we ask that the comment period be extended to a minimum of 60 days.

The United States has the distinct pleasure of welcoming over one million international students and scholars this academic year. International graduate students at the master's and doctoral levels comprise 18 percent of the graduate student population alone at CGS member institutions. They come to the U.S. to study, to conduct research, and to contribute to our nation's academic, scientific, and economic endeavors. Their roles as members of the campus community and in advancing our country as a global competitor are significant. Given the complexities of the proposed rule, we believe that a longer comment period is not only appropriate, but necessary. Academic institutions and international students (both current and prospective) will be greatly affected should the regulations go into effect. Therefore, allowing time for these stakeholders to analyze and develop thoughtful responses illustrating the potential impact of the rule is warranted. Thank you for considering this request.

Sincerely,

zanne I. Ostega

Suzanne T. Ortega President

## **AFFILIATES**

Conference of Southern Graduate Schools Midwestern Association of Graduate Schools Northeastern Association of Graduate Schools Western Association of Graduate Schools