



International Education Town Hall Transcript

Responding to the DHS Proposal to Eliminate Duration of Status

October 16, 2020

Panelists

Machelle Allman

Machelle has devoted her entire professional career of over 20 years to international education. After five years in international admissions, she switched focus to international student advising and has served students in private colleges, community colleges, and large and small public research institutions. She has served in leadership positions at the state and regional levels and served at the national level in Region 1's chair stream. She presents and trains frequently on regulatory and other advising topics, including F1 regulations, employment issues, and best practices in international student advising.

Rachel Banks

Rachel Banks is senior director for public policy and legislative strategy at NAFSA. Her portfolio focuses primarily on advocating for U.S. government policies that attract international student and scholars to study or conduct research in the United States, and oversees the production of NAFSA's annual economic analysis of international students studying in the U.S. She holds a master's degree in public and international affairs from the University of Pittsburgh, and a bachelor's degree in history from the University of Michigan.

Sam Brown

Sam Brown is director of international services at BYU. He leads the office team in assisting students and exchange visitors to maintain status and in providing supporting programs. Sam received a BA in English, an MPA and EdD in educational leadership and Foundations from BYU. He also received an MS in academic advising from Kansas State University. He is currently chair-elect of Region II.

David Fosnocht

David Fosnocht, JD, is director of immigration practice resources at NAFSA: Association of International Educators, and editor of the NAFSA Adviser's Manual. Before joining the NAFSA staff, he was a NAFSA member and associate director of the International Services Office at George Washington University. Prior to that, David practiced as an immigration attorney in Washington, D.C. He holds a BA in modern languages from Villanova University and a JD from Georgetown University Law Center, and is a member of AILA and of the California and District of Columbia bars.

Mihaela Metianu

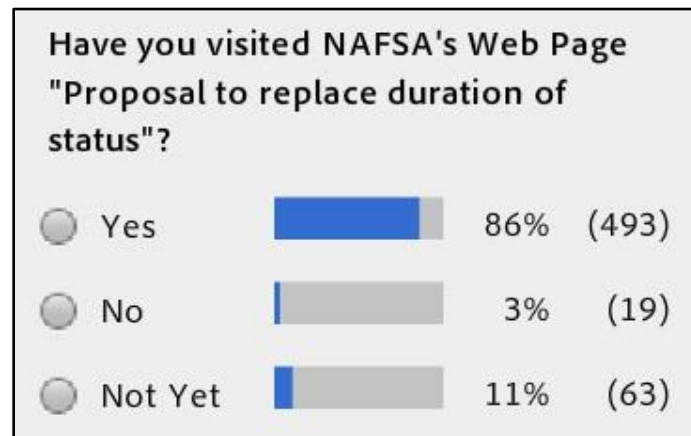
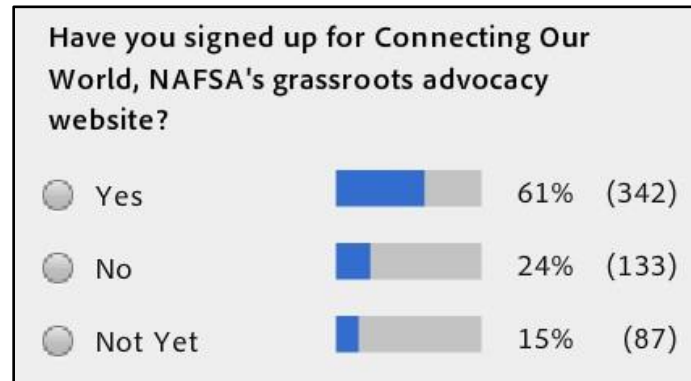
Mihaela Metianu, EdD, currently serves as the executive director for the Center for Global Engagement at Florida Atlantic University. She joined FAU in 2006 and was appointed to her current position in 2016. As the senior international officer at her institution, she is responsible facilitating and coordinating the

global strategic platform and for leading a wide portfolio of international services and programs, including international student services, international employee and scholar services, education abroad, global academic services, and the intensive English institute. Mihaela holds a doctoral degree in higher education and a master's degree in multilingual and multicultural education from Florida State University. She has more than 20 years of experience in international higher education and is a long-time NAFSA member and active member leader.

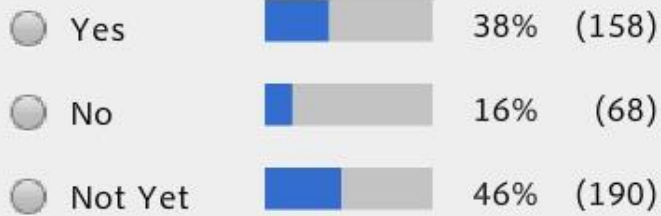
Steve Springer

Steve Springer, JD, is director of regulatory practice liaison for NAFSA: Association of International Educators and manages NAFSA's engagement with federal agencies concerning regulatory practice issues, among other duties. Prior to joining the NAFSA staff he worked as an immigration attorney, representing higher education institutions and their faculty, staff, and students, and worked in-house managing immigration services for several major research universities. He is active in the American Immigration Lawyers Association (AILA) and served as a Peace Corps volunteer in Poland.

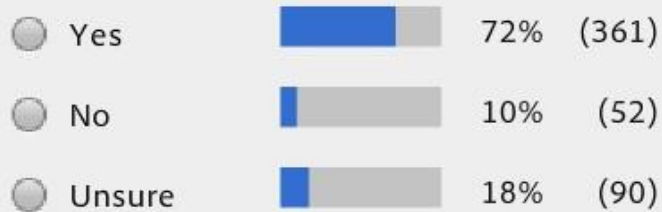
Poll Questions



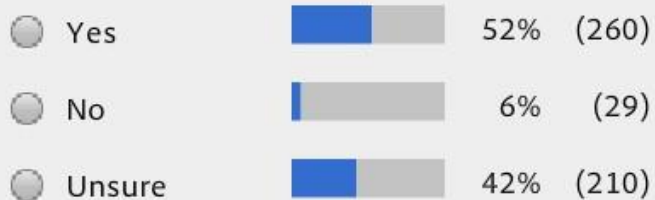
Have you or other officials from your institution contacted members of Congress about this proposed rule?



Do you personally plan to submit a comment letter?



Will your institution submit a comment letter?



Helpful Links

[NAFSA Page on Proposal to Replace Duration of Status](#)

[Talking Points Template for Commenting on the Proposed Rule to Eliminate D/S](#)

[Connecting Our World](#)

[Regulations.gov Comment](#)

[Regulations.gov Comment \(if first link gives error\)](#)

[Tips for Writing a Useful Government Comment Letter](#)

[NAFSA Press Release on the Proposed Rule](#)

[NAFSA Press Release on Duration of Status 2018](#)

[NAFSA one-page issue brief for Congress on Duration of Status](#)

[Notes from June 2020 Meeting on the Proposed Rule](#)

[APA Public Notice and Comment Procedures](#)

[NAFSA International Student Advising Network](#)

[Voice of America Article on Duration of Status](#)

[Letter Requesting Extension of the Comment Period](#)

[Inside Higher Ed Article on Duration of Status](#)

[PIE News Article on Duration of Status](#)

[Regulations.gov Comment Portal](#)

[Proposed changes to 8 CFR 214.2\(f\)](#)

[Proposed changes to 8 CFR 214.1](#)

[Proposed changes to 8 CFR 214.2\(j\)](#)

[Proposed changes to 8 CFR 248](#)

[Proposed changes to 8 CFR 274a.12](#)

Chat Transcript

Lin Larson: have called and written as a private citizen numerous times

Kara LaSota: It would be helpful to have the NAFSA web page be available to external audiences. I know people who want to comment and be helpful, but who aren't NAFSAns

Joann@NAFSA: @Kara - the webpages are open to members and non-members. They are not restricted

Ari Rosner-Salazar: Re advocacy, I think professionals working in state institutions walk a very fine line. We definitely can't use our professional email, title, work computer, or submit during work hours. It might be good for NAFSA to help guide us in walking that line based on state regulations (ideally) or at least generally with an eye towards those who are technically state employees.

Joann@NAFSA: @Ari - The panelists from the three institutions will discuss this topic.

Ari Rosner-Salazar: Thank you!

Lindsay Addington: Would be helpful to hear your thoughts on how the proposal would impact F-1 secondary school students/schools supporting these students.

Whitney Silverman: Agreed Lindsay! We are focused on that as well obviously

Lin Larson: That is is mostly Africa...Yikes.

Lynda Nyce: What can a student do during the time of I-539 adjudication? Does study need to stop while the application is pending? could the student leave the US and apply for a new visa instead of applying for the extension?

Jolene Bowser: How early can you apply for the I-539. If I have a middle school student needing 7 years to complete - how far in advance could they apply?

Mary Dawson: What about-architecture bachelor's are 5 year programs

Lin Larson: What about PhD programs? Done in 4 years is unlikely.

Jane Nucup: How does one know if a program is against the national interest? Is there a list?

Claudia Ortiz: what about associate level? Usually the program takes two years but students may need an extension due to a change of program or medical situation.

Becky Leevey: What about dual degree programs (3+2 or 4+2)? How would those program be affected?

Tatiana Woldman: what about PhD programs that usually take 5-7 years?

Ari Rosner-Salazar: Does this violate some type of rule against discrimination based on national origin?

Erik Williams: Are we to assume DHS would be entering e-verify information for all schools so that CBP officers have access to that? This seems like it would drastically change the processing times at the border.

Jennifer Nisevich: If there is time for questions, I'd like to know how to submit the best comments. Do I need to break it down to the actual code of the sentence of the rule? Or can I just submit my comments without connecting the dots like that?

Erin @ NAFSA: @Jennifer - we will discuss tips for comments later in the presentation :)

Rob Timberlake: What does "depart" mean in the second bullet of this slide?

Jennifer Glass: If student hadn't submitted OPT application on rule effective date (but they'd just graduated, for example), would they need to file EOS?

Michelle Massey : I would love to understand what, if any, impact this would have on visa duration

Cheryl Delk-Le Good: RE: Adocacy on the individual level, Ari mentions good points--you can submit comments as an individual constituent but some guidance would be great to help alleviate some anxiety submitting (i.e., non-working time, personal email, personal computer,). We're using this language with our members: "Some of you may be getting reminders from your institutions/programs during this period of active advocacy, reminding you of limitations and prohibitions on political activity when such activity uses institution/company resources or is tied to employment. Please be aware that this most likely does NOT prohibit you from submitting comments to the Federal Register or contacting your Members of Congress as an individual and as a constituent. Be sure to submit using a personal vs. work email address and complete such communication on your own time."

Cheryl Delk-Le Good: @ARI and @Joann--thanks---just saw your comments. Very interested in this to help people feel better!!!

Michelle Vale: What if a student's OPT application is denied, and a student decides to appeal the decision? They have to be present in the U.S. to file an appeal....

Marion Froehlich: The only issue is if the student is summoned for biometrics while out of the U.S.

Mike Hollabaugh: Wondering if a student applies for OPT before program end date, then departs U.S. while that application is pending and before I-20 program end date, and has EAD mailed to them once approved abroad to then present at POE, if CBP would grant them new I-94 for duration of EAD (thus avoiding applying for EOS simultaneously)?

Kristina Bautista: If a student travels after we have issued the OPT I-20, will the I-94 end date be to the end of the OPT or the program end date?

Joe Frake: What about OTHER/Pathway degree level, not Language Training level, but starting ESL classes at the beginning of the pathway? I wonder if they'd still be treated as ESL for setting of admission expiration?

Jane Nucup: Does a student have to file an EOS application, or can they travel and re-enter without an EOS application?

Michelle Massey : Jane, great question, I'm wondering this too. Kristina this is my main question as well, struggling to wrap the head around this one

Richard Tanson: How can this Proposed Rule be proffered when both Chad Wolf and Cuccinelli are serving unlawfully according to the GAO

Whitney Silverman: on the 'travel while EOS pending, return on extension I-20, what does it mean to reenter on I-20 with end date beyond form? is the form in question the I-20 or the I-94? In a situation where the date on an I-20 may be longer than 4 years for example, but the student is in a longer program and thereby needs an EOS

Daniel Eshcol 2: How would this affect the way students request transfer from a Master's program to a language program?

Kelly Hughes 2: If a student is only issued entrance for 2 years, but is coming for a 4-year degree, is it compelling academic reasons to allow them to complete their degree?

Jolene Bowser: Limits on extension of stays - how will this effect elementary/middle school students? Will they face a situation where they can no longer apply for an extension?

Whitney Silverman: do these standards apply when a student doesn't need more time to finish a program, but the program itself takes longer than the time allotted (4 or 2 years)

Jeffrey Cox: A typical PhD program of 5 years, plus a 3 year OPT+STEM period=8 years and could require 3 extensions of stay (at a current cost of \$455/filing, including biometric fee). So, \$1,365...and maybe 9 total months of USCIS processing time...

Connie Childs: This rule truly creates a solution for a problem that does NOT exist. The pretzel twisting is amazing.

Michelle Massey : Kelly one would certainly hope so! I can't imagine how that would be combatted..

Mark Dennis 2: If USCIS has RFEs for extension requests, it seems that the majority of those will require responses from academic advisors as opposed to international student advisors/DSOs

Anastasia Fynn: How about Aeronautical science program, with flight training. They almost always take longer since flight training is very dependent on weather changes, TSA clearances etc

Lily Swan: Are they going to hire more people to handle these requests or are the students going to wait 90-120 days, if not longer, to adjudication?

Whitney Silverman: how early must (and or can) a student file the Form I-539 extension

Michelle Vale: These guidelines show that USCIS has no clue how higher ed works - for instance, sometimes students have to extend because a required course in their curriculum may not be offered until the following semester. We have no control over when the academic departments schedule/offer their courses and it's not unusual for a course to be offered only every other spring/fall semester, etc.

Joann@NAFSA: Thank you for all the great questions! These all make great points for comment letters!

Michael Ziadat: Yikes

Kevin Beisser: 90-120 days? It is taking upwards of a year for I539 applications for reinstatement\

Liliana Vedia: Can students continue studying while their EOS is pending?

Lily Swan: I was being facetious. I know they're taking longer than 90-120 days.

Kathy Foley: ^^Connie Childs

Amy Bello: Can these be concurrent applications?

Ginger Villanueva: Students beginning in ESL, then moving to a "bridge" program, then associate, currently must have separate I-20s. These students will now need to file an extension of stay for each one, if I understand the proposal correctly!!!! This is at community colleges, all three programs at the same school.

Susan Taylor: I was thinking the same thing Ginger!

Daniel Eshcol: how early can the EOS be submitted?

Jeffrey Cox: Sorry I might have missed this on slide 22 but does the EOS have to be approved prior to filing for an OPT, or prior to the OPT being approved?

Jeanne Kelley: Hi David, Could you comment on the intent and the impact of the severability clauses referenced periodically throughout the proposed language?

Jeffrey Cox: Or can the EOS and OPT be filed and approved concurrently?

Regina Degnan: A CPT within the program end date would not be aff

Lorenc Mansaku: USCIS will make up for the failing budget it had this year

Kelly Hughes 2: Inability to do CPT at a given point in a student's program when they may happen to have an extension pending might lead to additional academic difficulties with regards to sequencing, and may require additional extensions....

Connie Childs: LOL at these hours!

Michael Ziadat: I need 8 hours just to read it.

Aaron Humiston: The only reason so-called "good" things were added to the proposed rule changes were to entice those of us working in immigration to go along with all this unfair and malicious garbage; not a single addition is genuine nor even close to compensating for the tremendous damage this would do.

Nusha Shishegar: @Connie? Right? Dying from laughter

Jessa Karki: Yeah right USCIS - really?!

Janice Bianco: 8 I need 3 days to read it and 3 days to digest it!

Cheryl Delk-Le Good: @Michael Ziadat....perfect!!! ;)

Shonna Montoya: hahah on the hours also

Nusha Shishegar: Ironic, angry laughter

Kevin Beisser: Are Law Suits possible or because it is a rule change no?

Regina Degnan: A CPT within the program current end date would NOT be affected by an EOS?

Martine Angrand: All of it.

Joann@NAFSA: What concerns you most about the proposed rule?

Kas Singh: Second Jeanne Kelley's question on severability clause

Kristen Dennis: law suits are definitely possible, especially because there is no validly appointed head of DHS/USCIS

Jane Nucup: The uncertainty for everyone - students and schools.

Whitney Silverman: impact on K-12. many of our students will need an EOS just to get through primary/secondary ed. will definitely need EOS to continue on to college

Erika Lees: Increased fees for students and increased work for DSOs

Audra Johnston: What concerns me most? What DOESN'T concern me?!

Amy Bello: The 2-year admission and challenges for students from countries that bring diversity to our campuses.

Lin Larson: reduced enrollments and continuation that the US is hostile to international students

Maria Frigge: decline in enrollment

Mei-Ling Wang: The processing time of EOS application

Maria Frigge: training

Mark Dennis 2: The extensions getting rejected and the student not being able to finish the program as planned.

Martine Angrand: Employment issues

Vanessa Luther: E-Verify

Catherine Crowe: So for states that require proof of lawful presence in order to enroll, would a student with a pending EOS be considered lawful present solely on the basis of the timely-filed EOS receipt notice?

Jessica Dories: Fees for students and processing times

Jennifer Nisevich: Reduced enrollments

Marci Fradkin: completing a degree in four years

Kelly Hughes 2: USCIS adjudicating academic issues

Whitney Silverman: how K-12 will navigate these with minors

Parker Emerson: David that was great. Did I understand the transition as "until end of I-20/ DS-2019 date PLUS 4 years???" That was not my read. Thank you.

Heather Jacobson: The ability of USCIS to adjudicate all of these additional petitions

Allison Scheetz: employment while EOS

Megan Kohr: increased fees and USCIS processing times

Ginger Villanueva: These rules will make study at community colleges untenable.

Tess Casler: Increased fees & time for students to maintain status

Kevin Beisser: THE DESTRUCTION OF INTERNATIONAL EDUCATION

Rae Alexander: More students will end up falling out of status

Sonja Paulson: Paperwork--Scaring off students (the process for OPT); current PhD students who need 5-6-7 years to complete their program

Catherine Crowe: All the extra work

Elizabeth Webber: so many things for the students to have to do and fail at

David Elwell: processing times of EOS

Lily Ferris: For J students, does th 240-day working permission apply both to students on academic training and on-campus employment?

Tina Newton: Cost and timeframe for extensions

Maggie Shirland: Losing international students and increase in work load

Martine Angrand: USCIS processing times

Joel Weaver: Increases barriers to study in the US!

Victoria Woisin 2: extensive delays and costs

Alyssa Tobar: Proposed effect on language training programs

Mei Cooley: Cost and duration of how long EOS would take and what constitutes "compelling academic reasons"

Patricia Juza: Barriers to changing education levels

Aida Neary: Discrimination against african countries

Jerry Woehr: OPT processing and getting EAD in time

Susannah Marcucci: Financial burden for students

William Mallett: EVERYTHING concerns me :(

Gary Young-Allen: Impact on ESL and Associate's degree students

Jaime Weidner: Decline in enrollment

Anastasia Fynn: the fees and turn around time for processing these applications

Martha Baillargeon: Needing to file an I-539 for OPT and STEM OPT

Michelle Massey : Chilling effect due to the complications around CPT, OPT, and just being a student. Actually learning it and managing it in-house! Timing of I-539's

Megan Kobzej: The complete lack of understanding of language learning - 2 years TOTAL?

Amanda Doran: For J-1 scholars - financial burden on scholars and dependents

Julie Wilbers: International educators will lose interest in the field. It's so compliance heavy now.

Christian Bragg: Routing these extension requests through an already-broken USCIS.

Daryl Bish: Elimination of D/S and the 24-month limit on ESL programs.

Robin Catmur-Smith: The message it sends to international students and scholars - you are not wanted here....

David Racki: Cost and Time of all these extension applications

Dana Brolley 3: Impact on enrollment and staffing impacts

Laura Arthur: Negative impact on enrollment

Wing-kai To: student mental health

Lori Friedman: Processing times of EOS (additional cost, etc) and Everify requirement/2yr max

Haviva Parnes: The 2 year limit or language students

Marci Fradkin: Make OPT harder

Elizabeth McGovern: K-12 schools?

Senem Bakar: My biggest concern is that this rule will divert the demand for U.S. education to other places. It is already a tough market.

Natalie Rigby 2: I-539 delays in all of these filings

Kimberly Hajec: The elimination of D/S & USCIS processing times

Susan-Ellis Dougherty: Extension processing time at USCIS

Andrew Shiotani: the message this sends to students and scholars

Andrea Tikofsky: I-539 are taking 11 months

Lisa Lyman: punishing community college students

Jacquelynn Leyvas: CBP interpretation

Stephanie Woolbert: I represent a graduate school. The time limits are a huge concern, especially for doctoral students

Tara Evans: The effect on students and scholars

Lisa Kraft: the time for extension requests to be processed and the cost to the students

Britta Wright: Increased fees for students and increased workload for staff. Decrease in enrollments during an already uncertain time.

Lorenc Mansaku: and, they will be able to expel any former student who was admitted on d/s previously, and is currently in the US

Charter Morris: This sets up students for failure and nearly guarantees that there will be gaps in status.

Connie Childs: The complete unworkability of all of it.

Kate Emory: Uncertainty of the rule, how it affects schools and students, and the perceived discrimination against students from certain countries

Julie Johnston Hermann: What isn't concerning ...

Adam Julian: The broad message

Meryl Halpern: The time and cost involved for the students

Kimberley Cossey: Concerns me the most: Having to extend every single PhD I-20 and not knowing if the "compelling reason" will be understood by someone who has no experience at a university.

Susan Jagendorf-Sobierajski: Not enough time to complete a program or apply for OPT

Elizabeth Webber: my first thought is are you kidding?

Kara LaSota: All the things.

Nick Hernandez: what appears to be racial discrimination regarding the limit on students coming from visa overstay countries

Stephanie Krause: the complexity of this whole process and the government's inability to keep up with their own requirements

Kas Singh: Too many to list here but that it will NOT achieve what they claim it will and create more work for all involved.

Jose Sainz: There is not enough wine for this.

Dorota Kendrick: what is the likelihood of this proposed rule being challenged and reversed?

Manasi Devdhar-Mane: All of this concerns me

Christie Thomas: I-539 processing times

Jerry Woehr: PhD. programs and Architecture programs that are 5 years.

Betsy Madden: The entire rule. Elimination of D/S will destroy fundamental research being done by international grad students

Sarah McGregor: 24 month limit for ESL

Laura Vaughn: Harm to ESL students who want to move to academic.

Greta Smith: Financial burden on students from filing multiple extensions of stay

LaTasha Gonzales: Processing time and not giving students any flexibility

Michael Ziadat: Massive changes during a pandemic and historic layoffs

Reine Chabarika: Extension process

Jolene Bowser: Please discuss more about the implication for elementary and secondary education

Carmela Patton: OPT processing at the same time as EOS

Dagmara Karnowski: decline in enrollment, extensions and waiting period with USCIS

Yasir Mohamed: Lack of CPT extension since I rely on that for academic internship

Lori Hartley: My concern is that USCIS will not be able to process EOS applications in a timely manner.

Elizabeth LEIBACH: Message of lack of trust for us and our students

Parinaz Zartoshty: yet another road block for international student enrollment

Jennifer Kenyon: Long processing times and declining enrollment

Christina Luther: I don't envision students coming under these restrictive rules

Jodi Hanelt: We are not prepared to advise on I-539s as an office to avoid unauthorized practice of law.

Jessa Karki: Any impact on CPT, RCL, or any reporting which needs to be done while the EOS app is pending.

Supaluck Senaluang 3: Yet another deterrent to study in US :(

Janice Finn: complexity of regulation compliance; additional costs to students and scholars; yet another deterrent for international students to study in the U.S

Joseph Ng: i-539 processing time and additional costs to students.

Joann@NAFSA: @Anne - the slides and recording will be available to everyone.

Penny Rosser: Repeated extensions for J scholars (possibly up to 4 during the 5 year maximum program participation

Sal Mazzone: Diminished International enrollment

Andrea Tikofsky: Requiring combined fees for I-765 and I-539 applications for OPT

Lynne Vanahill: Students feeling unwelcome in the U.S.

Kristina Bautista: The extra financial and emotional burden on the students as well as the ability for students to complete their program.

Julie Wilbers: Overall US public policy. International students contribute greatly to perception of U.S. within the world.

Natalie Rigby 2: Discouragement beyond belief to come and cost

Grace Semple-Paul: It gives the ISS the impression that the US is not a welcoming place, but would rather burden the students who are seeking to enhance their education experience

Nusha Shishegar: ALL OF IT. Unfairness to students, less attractive/more costly environment for students affecting recruitment/retention; complicated rules requiring MUCH more time than estimated, USCIS inability to keep u

Mathura Small: Processing time and fees

Catherine (Kate) Sacco: impact on the field of international education and our students

Joni Bube: Increased cost to students will affect enrollment.

Jean Sauvion: Transfer implications: many of our programs prepare students for grad programs.

Christine Collins: Reduced enrollment and undue hardship on those affected.

David Elwell: DSO staff time needed to advise and for students to process applications in a timely manner.

Mei Cooley: Student's mental health re: ability to meet with family abroad during their programs

Carla Guthrie: Processing times, creating more overstays, fewer international students and exchange visitors coming to the U.S.

Lindsay Addington: Impact on students' interest in coming to US to study.

Katie Pettet: The 4 year limit even for people with PhDs. This is an unheard of timeline for any doctoral student.

Haviva Parnes: and the turnaround time for processing

Jeff Hutcheson: Same argument as gun control - pass more laws impacting law abiders to address those who ignore the law (visa overstays)

Mike Hollabaugh: The uncertainty and confusion it will cause in addition to the obvious harmful effects - and with the lack of agency cooperation and communication we have had this will just be a nightmare for al, including the government agencies (CBP, USCIS, DHS, SEVP, EVP).

Angela Beca: My University heavily depends on int'l student tuition. I don't see why students would come to the US with all these hoops when they could go to Canada or England for just as good of an education

Lisa Harris: Medical I programs with required practical/CPT held hostage. Will cause serious problems for doctoral and nursing students.

Sayaka Tachibana: To explain all this to our students is the hardest thing

Terri Crowl: Inability (and obvious unwillingness) of DHS and USCIS to effectively implement the new rules and keep up with the flood of EOS requests the new rule will entail.

Aaron Humiston: What concerns me most about this rule is the fact that it is entirely a thinly veiled threat from the current administration and a terrifying omen to the potential elimination of OPT.

Roger Douglas: decline in enrollment; US looking and acting non-welcoming to all international students

Jodi Smith: increased fees for students & USCIS is not ready for the impact of processing

Kristen Hagen: Targeting a perceived problem that doesn't exist. Does not recognize value of students and is definitely a deterrent for doctoral students who would have to start a program they wouldn't know if they could finish. And yes, crazy to rely on USCIS processing for extensions

Mei-Ling Wang: E-verify requirement

Amanda Doran: Also that it will completely derail USCIS' processing capabilities

Jenny Bowen: Unwelcoming to "aliens" (come on, DHS) when students and scholars are the most tracked non-immigrants in the country. SEVIS, anyone?

Justin Lampley: EOS processing delays and the personal consequences on students and their education/employment

Daniel Eshcol 2: Program Extension restrictions. Reinstatement rates will substantially increase

Amy Garrett-Cowan 2: For J-1s, what will be the governing document for I-9s? The DS-2019 program end date or I-94 expiration? How does it impact I-9s already completed?

Janice Bianco: the time needed to process all the I-539s, the money associated with the process and the possibility that our exchange visitor physicians may not be able to continue in their training program.

Manishka Kalupahana: The large gap between the time the extension of status application is submitted and the time when the final decision is received.

David J Nelson: Canada, Australia , U.K. etc. Very Happy indeed...

Lauren Berlamino: all the extra work and confusion and toeing the line of advisor vs immigration attorney with i539 filings

Shonna Montoya: this completely changes J-1 program administration the hours mentioned to incorporate these changes is a joke

Erin Gustafson: Harm (unwelcome, unable to finish) and expenses for students

Jodi Nelms: decline in enrollment, program closures, global think tanks weakened, continued unwelcome message

Helen Leonard: USCIS taking too long to adjudicate extensions. High fees without high service

Elise Hoskins: Delays in approving EOS leading to students losing opportunities to complete their program, apply for OPT, etc

Jodi Simek: it is way too confusing, Everything can be done in SEVIS if ICE wanted to, USCIS can't even manage its works now, the incredible cost, academic standards are no longer with the institution

Ashley Bus Morgan 2: soft diplomacy opportunities

Ormond Rucker: The processing timelines for I-539, additional costs and a reduction of students.

Ginger Villanueva: Would contacting our legislators help?

Fumiyo Araki: E-Verify, EOS processing time, fees, extra workload for DSO

Dagmara Karnowski: limitation of academic programs and invading academic side of the house;

Rick Lane: The distrust that this demonstrates on the part of a government "partner" toward those working directly with students.

Emilie Buse: Seconding Nusha. Almost all the things from this proposal will have a negative impact to us all.

Yasue Oneill: institutions not actively participating in E-verify - students can only have 2-years.

Julie Wilbers: Students will go elsewhere. There are other options and I can't blame them. I would do the same!

Ruth Prince: How can we support students? Will SEVIS accurately report I-94 end dates, when it doesn't accurately report travel data now?

Regina Henry: The length of time for USCIS to make a decision. The difficulty to explain to students.

Amy Minick: Currently 66% of our student body is on F-1 visas. The resultant loss of students due to these onerous policies would be devastating to our research efforts and our U.S. students' ability to collaborate on an international level.

Mei Cooley: Decline in enrollment

Susan Taylor: Unclear how community colleges with Pathway programs should handle EOS when a student will likely change ed levels twice (second language learning to pathway to full Associate)

Jacob Cushing: Broad concern? Additional restrictive rules will only continue to lessen the U.S.'s grasp as the global destination for higher education.

Cheryl Delk-Le Good: Hurdles, hurdles hurdles----

David Elwell: PhD students must file multiple EOS during the normal/standard degree program length(administrative burden, fee costs to students).

Kaley Knowlton: Processing times and the general lack of understanding on how this will actually impact students.

Stephanie Woolbert: Undue burden and costs on students requesting an "extension" when they are simply within the normal time to degree (graduate programs)

Catherine Lee: International Students will go elsewhere for their education

Kristin Oberheide: So much is concerning! EOS to no longer be decided by the school

William Mallett: Can I say WTF is wrong with USCIS/SEVP/DHS?

Simone Kueltz: I-539 filing, uncertainty of outcome, cost, processing time

Elizabeth LEIBACH: Selectivity of student visas which are tracked more than any other in the history of this country

Catherine Toohey: hardship to students, impact on enrollments, work load for institutions, DHS making decisions that disregard students and institutions

Michelle Vale: All the things. Primarily USCIS processing times & fees. Naturally, this will lead to a significant increase in the number of I-539 apps for processing, so the next thing this will lead to is yet another fee increase for the I-539.

Becky Mirza: When could this rule start if DHS proceeds without taking our comments into consideration?

Jeffrey Cox: Most concerning is DHS' disingenuous claim that this rule will improve national security. They have offered no evidence of that. Nor have they offered evidence that anything in the current D/S policy is broken in any way. Highly concerning is the huge financial and time burden this will place on students, and schools.

Elif Balin : Injustice for students who have already invested in educational and career plans based on the current policies. Students' life-career plans and sacrifices so far would be dismissed, which is a huge harm.

Connie Childs: @william mallett - YES!!

Natalie Rigby 2: 2-4 week extensions for example would be impossible!

Andrea Tikofsky: Tracking end date and informing students about the requirement to file EOS or travel

nancy e young: They are draconian, especially the impact on students are of great concern

Julie Wilbers: Unlawful presence accrual. Increased liability on international offices.

Zahra Rasouli : How will this proposed rule affect Iranian students and scholars who are already under pressure due to the Muslim ban? Will USCIS reject extension applications the same way it denies our F-1 visa applications often?

Katie Irwin: These hurdles will deter students from coming to the US....who would want to come if they knew of all the hurdles and cost??

Shonna Montoya: Cost

Jennifer Golden: My concern: Students will no longer want to study in the U.S. This will be the nail in the coffin.

Roopa Rawjee: Too much focus on status continuity - not enough time to focus on education.

Kathy Foley: Where to begin... even for a small school managing this will be significant; impact on our intl community and beyond; EOS--high costs and long timelines that will create havoc;

Jennifer Kenyon: This clearly shows that the US is NOT welcoming to international students

Kelly Moran: the ability for institutions to update systems to keep campuses and students up to date on processes and policies. Also, the timeframes (2 years and 4) are arbitrary and do not indicate an understanding of normal time to degree completion.

Audra Johnston: @William Mallett - YES!

Richard Tanson: Notice how the issue of fraud is only offered anecdotally, no statistics presented. Why? Because it is virtually non existent issue. A solution without a problem. The point here of this evil regulation is to prohibit international education and punish "liberal" universities

UC Davis: Students will go elsewhere; the US is not worth the anxiety and uncertainty while feeling unwelcomed. Why come here when there are other countries that are more welcoming.

Jodi Simek: ending ability of smaller institutions to manage and many schools will be dropping out of hosting international students

Kathryn Fogle: impact on grant-funded research performed by international graduate students and postdocs

Lynne Warner: I-539EOS multiple filings, costs to students, erosion of DSO discretion

Janice Bianco: Concerned about j-1 research scholars who are hired as post-docs may need to be terminated because of I-9 requirements, financial impact on families who will not have an income for months.

heidi white: the way this will further reduce the number of international students and scholar sin the US

Lauren Berlamino: impact on higher education in general given the opportunities to study in other English speaking countries

Senem Bakar: Also, it seems like all these changes over the years take the DSO out of the equation and makes ICE and students the only participants in this. I feel less and less empowered in my ability to support international students and advance international education. Most of my time goes to all these technical things.

Joseph Ng: Unwelcoming image to the world.

Danielle Olmo: I'm concerned with enrollment. These changes do not consider or offer assistance to students. The overall message is negative to potential and current students. Including the requirement to file and pay for multiple forms while in the U.S.

Joann@NAFSA: Thank you for sharing! Please make sure you use these as talking points for your comment letters!

Natalie Rigby 2: tracking these internal I-94 end dates. Will it be in SEVIS?

Laura Buhs: time and cost to students, lost opportunities because of the time and costs

Michelle Massey : Let's add in n the blatant discrimination in using the overstay rates instead of raw numbers are used to determine the shorted admission duration

Margaret Hellwarth: Research and other institutes that run PhD programs in biomedical Sciences will be disadvantaged as the PhD takes no less than 5 years and often 6. In addition, the majority of students we have are from China and if they are offered 2 years at a time, they will have to extend 2 times at cost and risk of not finishing the program. This will discourage Chinese graduate students, so important to research.

Joanne Gilbert: The adjudication time for both I-539 and I-765 for OPT and STEM OPT when CIS is already so back logged

Shonna Montoya: Issues in extending driver's licenses while EOS is pending

Mary Alurwar: That's great to hear!

Janice Bianco: Joseph NG - EXACTLY!!

Jef Davis: Jef Davis: Overly burdensome, unnecessary, punitive, will reduce the number of students coming to the US. US HE has embraced taking over DHS' role in monitoring F-1 and J-1 nonimmigrants through SEVIS in exchange for some flexibility in managing our academic programs..

Sarah Driscoll: Processing times, fees, USCIS making determinations about reasons for extension, burden to do biometrics, impact on CPT/OPT... all resulting in so much uncertainty for students and schools

Lisa Kraft 2: The fact that they know it may reduce international enrollment when it is needed most and the government proceeds with this plan.

Cheryl Delk-Le Good: EnglishUSA, TESOL, and UCIEP Joint Statement released today:

<https://www.englishusa.org/page/TakeActionOctober2020>

Jodi Simek: should finances associated with EOS or travel be included in proof of financial support

Patricia Juza: Do we have bipartisan Congressional support against the proposed rule change?

Steven Spiegel: Impact on Higher Ed when less international students and scholars come to the United States.

Shonna Montoya: employers being able to track all of this and keep I-9s in compliance

Liliana Vedia: Enrollment is a concern, but also retention and resources in schools. ISSS offices will need more staff if we will assist students filing COS

Caitlin Szymkowicz: trying to help students navigate their own status and how to maintain it. With EOS being a personal application, DSOs will have to toe a fine line between supporting our students and unauthorized practice of law. It's already a hard thing to navigate, but this makes it all the more difficult.

Delores Blough: Yes and Yes

Greg Wymer: Steve, do you anticipate lawsuits?

Nusha Shishegar: Individual: yes. Institution: not sure

Michael Ziadat: What is the expected timeframe for this all and going into effect?

anne verini: yes and unsure

Janice Bianco: Yes and I think so

Grace Semple-Paul: yes

Nelly Wadsworth: Yes to both

Grace Semple-Paul: yes

Lynne Warner: yes and yes at The University of Denver

Ashley Bus Morgan 2: Can we share this screen with our students? Many have expressed some comfort in knowing what is being done on their behalf.

Ellen Cohen: DHS usurping the role of educators in academic decisions

Jodi Simek: How do students in rural areas get to biometric appointments and will they miss class, labs, exams, etc

Alison Jackson: Wow. never knew that was possible.

Natalie Rigby 2: US CIS centers do not have resources for this and probably won't get any more.....

Joanne Gilbert: The tracking of student's EOS pending and whether they can continue working on campus or do CPT

Cheryl Delk-Le Good: Joint State with EnglishUSA, TESOL and UCIEP released today:
<https://www.englishusa.org/page/TakeActionOctober2020>

Joseph Ng: We're becoming unofficial DHS agents monitoring status

Lauren Berlamino: Our jobs - the unwelcoming nature of this proposed rule can reduce international student enrollment and thus budget and job cuts in ISSS offices...

Natalie Rigby 2: no trust in DSOs - why have us work so hard in SEVIS?

Heather Jacobson: Bwahahaha, flood them with comments!

Audra Johnston: @Joseph Ng and @Natalie Rigby 2 - YES!

Caitlin Szymkowicz: Really concerned about costs, particularly for aided international students, and the commodification of status. I'm worried this - along with proposed rules on expediting - will mean that those that can afford it will be able to extend their status.

David Elwell: USCIS does NOT have capacity to process the expected application demand.

BRENDA AUSTRIE-CANNADAY 3: Even with the increased fees, the funding won't be enough for DHS to manage the case load, especially if student enrollment falls.

Connie Childs: @Natalie Rigby -- exactly. It's insulting to P/DSOs and A/ROs.

Kas Singh: Exactly David Elwell

Adam Julian: Here here @David Elwell

Jodi Simek: it is redundant

Michael Ziadat: Of course it's excellent that we are engaging our political figures. But it's equally if not more important to engage with immigration-centric and race-centric organizations and political groups from a grassroots perspective. They are in many ways more efficient at sending out the message at a far faster pace.

Erika Rohrbach: If this goes into effect, perhaps all P/DSOs & A/Ros should go on strike.

Christina Luther: @David Elwell! Right! HOW is USCIS going to manage the workload that this rule will create?? They can't handle their current workload!

Mathura Small: The students can provide the comments, right?

Natalie Rigby 2: it has happened - when check "bounces" for real or error, student is in violation of status

Kas Singh: The rule claims it provides more opportunity to vet them - but the why have SEVIS - they already have more opportunities to vet F/J categories over any other categories!

William Mallett: @ David Elwell - absolutley right

Senem Bakar: Liked the strike ides, Erika :)

Nathan Clements: Students in ESL programs would need to file an extension after their program ends. Processing times are already extensive - The hassle and uncertainty would surely be detrimental.

Nusha Shishegar: @Mathura absolutey

Richard Tanson: and DHS officers will be deciding whether students deserve to complete their educations. Imagine the denials of EOS while student still engaged in studies

Olga Piro: DSOs at language institutions will be overwhelmed helping their students apply for EOS!

Mathura Small: Thank you @Nusha

Elizabeth Ysasi: Burden on students and further burden on USCIS who already cannot handle their loads.

Ellen Cohen: Why would a student gamble on coming to the US if there's no assurance that they will be able to complete their educational objective? Other countries happy to welcome the talent of international students

Lisa Harris: Going on strike would not be an effective strategy. It would only hurt our cause more.

Lynne Warner: They will not have capacity to process in time on EOS and then we have additional issues and not real discretion

Briana Gerrish: It should never be in the purview of a government to tell a student whether or not they can extend for an additional semester due to academic difficulties. The fact that the US government will be requiring proof of why a student needs an academic extension is crazy!

Kas Singh: @Ellen Cohen ditto

Jodi Simek: How would we even being to educate and advise current students

John Tucker: What is the timeline for an effective date?

Amy Bello: Yes, we are working on comments now as an ISSS team.

Natalie Rigby 2: why in the world do the dependents have to file with or separate from primary? what are they adjudicating as a decision for the dependents when it falls to the decision on the primary's case

Whitney Silverman: NAIS will be submitting comments on how this rule will impact K-12 students in independent schools

Terri Crowl: Bidding on contracts that rely on non-immigrant employees will be severely compromised due to uncertainty around continued employment authorization.

David Elwell: Duplicitous nature of request - if reason is to obtain/review information for a law enforcement purpose, USDHS already has 24/7 access to the data (in SEVIS) and can contact student/EV or school with a Request for Information at ANY TIME(which is already being done).

Michael Lockhart: yes

Lori Friedman: Submitting a comment on behalf of my institution and working with all higher ups to do so

Jane Nucup: No and no

Kathy Kautz: Yes and Yes!

Audra Johnston: Yes, we are working with other campus offices (senior admin)

Janice Bianco: I am working with our Govt Affairs office to formulate a response on behalf of our institution.

Adam Julian: yes and yes

Carla Guthrie: No and yes

Senem Bakar: I shared the links with a brief summary with my campus and encourage them to submit comments.

Lisa Harris: Are there any plans re: possible litigation?

Aida Neary: No and No

Joni Bube: No and no. Tried to.

Mei Cooley: Unfortunately no.

Catherine Crowe: Provost's office and university system are coordinating through government affairs liaison; I haven't been asked for specific details yet but will

Alyssa Tobar: No. I want to know, but I don't even know where to start.

Rae Alexander: Working with government relations

Wing-kai To: Yes. MA Council of Education is working together.

Susan Ellison: Yes, working with OGC and Provost

Christie Thomas: College of Sciences

Ann Kuhlman: working with the office of federal relations

Shonna Montoya: We are not allowed to submit a comment letter

Dora Zhang: No and No

Maria Oriti: No and no

Sayaka Tachibana: Yes and yes

Amy Bello: We are working with Government Affairs as well.

Kristen Adams: yes

Daryl Bish: no and no

Maria Frigge: Yes, we are submitting a comment as an institution.

Tess Casler: No -/ Yes - VP External Relations

Lori Friedman: Provost, General Counsel, President

Jill Izumikawa 2: My president's office

Vanessa Luther: No and Yes

Stephanie Woolbert: Yes to both. Working with the President's office

Masume Assaf: Yes, but not on behalf of the institution. Working with General Counsel and SIO.

Joel Weaver: Yes and Yes. Campus-level and system level.

Amanda Doran: Must get authorization from upper administration to submit comment letter.

Julie Johnston Hermann: Will work with Provost's office on a letter

Naomi Greelis: No and no

Dana Brolley 3: No, working with diversity offices

Karen Edwards: Yes: International Student Affairs and Office of the President

Leah Zimmer: Yes and yes

Kimberley Cossey: I am not able to individually but our office is actively engaging with other offices, particularly the Graduate School.

Katie Irwin: Yes, I am able to submit comment. Right now am working mostly by myself and possibly admissions

Jean Sauvion: No and yes.

Lynne Warner: Yes, and Legal Counsel

Jolene Bowser: on behalf of the institution (HS International Program Office)

Joseph Ng: no and no

Penny Rosser: Yes, General Counsel and Communications

Daniel Eshcol: Yes our campus is drafting a letter

Connie Childs: Yes. Working with our Graduate Medical Education office on our letter. This will affect J-1 residents/fellows, too.

Betsy Madden: The president of my institution submitted a comment letter

heidi white: Yes; Yes - president's office.

Jennifer Nisevich: I am not allowed to submit on behalf of my institution (despite being the PDSO). We are doing all we can to get an official response.

Elizabeth LEIBACH: Federal Relations officer at my institution

Richard Tanson: We will have an institutional response

Roger Douglas: yes and yes, all Colleges/Schools, Senior Admin

Rick Lane: The entire University of Illinois System is submitting on behalf of our three campuses.

Denise Folga: Provost's and President's office

Senem Bakar: All admissions, academic units and higher administration...

Olga Piro: Yes - UC San Diego

Meryl Halpern: I don't know and not yet

Jeff Hutcheson: President and Provost and EM offices

Margaret Hellwarth: Do not know yet if we can. Scripps Research is trying to partner with Salk and with Sanford Burnham Prebys.

Larissa Long-Vejar: Office of the President

Caitlin Szymkowicz: yes, able to submit on behalf of my own office.

Charter Morris: Working on this with the Provost's Office. Will either submit institutionally or through my office.

Andrew Shiotani: Our institution is writing multiple letters; our primary partner is our University Counsel

Jeffrey Cox: Yel. Allied with our Government and Community Relations office as well as our President's office.

Jennifer Golden: no and yes - but my institution doesn't want to submit a comment letter

Amy Minick: Submitting a comment on behalf of our institution and working with our Registrar on submitting it.

Christina Luther: @Ellen Cohen - EXACTLY!! Who will come if they don't know if they are going to be able to complete a program of study? What PhD student is going to take that risk?? There goes our research base as a nation.

Patricia Bello: Yes-- our institution is submitting a letter, as well as International Education and Global Affairs

Carol Myint: Minn State System Office is still considering if they would submit a comment or not.

Chrissie Kong: working with legal counsel to submit comments.

Carolina De la Rosa Bustamante: Yes! We are working on it.

Perinaz Zartoshty: government relations, provost, dean and president's office

Tina Newton: yes, through our Global Office

Elsa Gontrum: Working to govt affairs office to craft comment

Cindy McKay 2: Yes. We are working with our President's Office and with the CSU, Chancellor.

Haviva Parnes: We are submitting comments from all our schools across the US, from all the team members and we are changing some wording to make them unique

Susan-Ellis Dougherty: Yes , we are working with Office of Strategic Communications and the Government Relations office

Natalie Rigby 2: yes we can answer ourselves and there will be an institutional response

Sandra Layton: University Counsel's office

Kate Emory: Yes- I'm working with our Office of International Affairs on drafting a comment letter, and also working with the Presidents Council to submit letters.

David Elwell: No and Yes (Government Relations, OGC, Presidents Office, others)

Susannah Marcucci: ISSO is submitting letter. Other departments are submitting with letters with a different angle (Provost, Govt/Community Relations)

Delores Blough: No, and Yes. Working with university counsel, upper administration, and Law School Faculty

Jennifer Kenyon: No and Yes

Jodi Simek: working with my university system and now gathering information for our state attorney general for comment - encouraging my higher channels to comment

Naomi Greelis: I hope to write as a private citizen.

Lisa Eli: Yes and Yes - with President, Senior Leadership and Legal

Michael Ziadat: I am a one-person office. In what world can I educate my entire international population on this?! Ugh.

Kathie Kwilinski: the IP and IEP faculty and Staff, The President's (3) and the Chancellor of Seattle Colleges, the AAG of WA state

Stephanie Krause: yes and yes (Government Relations, Univ. Counsel, Global Engagement)

Laura Buhs: Institution signed the President's Alliance, encouraging individual comments from campus allies

Lin Larson: Cannot submit on behalf of institution until the system (UT) approves and creates a message. Have written as a private citizen.

Jia-Yi Cheng-Levine: Do you recommend one letter from one institution or multiple letters to create volume?

Elizabeth James: We are working with campus leadership to prepare a comment on behalf of my institution. I will also be preparing a personal comment.

Christian Bragg: ESL program, International Students & Scholars Center, University Legal Counsel

Fumiyo Araki: President's office, getting feedback from students, Admissions, HR, and Provosts Office

Ashley Pettingill: Yes through the guidance of our Provost Office

Hunter Swanson : Yes and yes, working with President's office.

Jennifer Golden: I will submit a personal comment letter

Maria Almendares 2: University of Wyoming ISS office is working with General Counsel and the Office of the President to submit a response on behalf of the institution. ISS will propose to ask for permission to approach elected officials and also the state government to also submit comments.

Janice Finn: Work with Legal Counsel, University Relations, President and Provost

Grace Semple-Paul: My University is joining with a group of institutions to submit a comment. I plan to submit my comment as an individual in addition to what the university is doing

Joy Stevenson: No but working with Our System Office on a statement and personal statement

Jenny Bowen: We are working with Federal Relations for a university comment letter.

Kristen Hagen: Yes, I can work on a letter for Florida State University. It will be reviewed by Director of Federal Relations, Associate VP, and Communications office.,

Lynne Vanahill: I cannot submit on behalf of my university so I will be preparing personal comments. My director and AVP are typing up comments to share with Public Affairs who will consider if our institution will make a formal comment.

nancy e young: Unfortunately, I don't expect processing these applications quickly will be a USCIS priority, that is why this is insidious in many ways

Kas Singh: Submit as a private citizen

Susan Jagendorf-Sobierajski: We will have a SUNY System letter that we can sign onto. It will be up to the campus president to endorse the letter.

Jodi Nelms: No at University of Houston. Working on a personal level with UH colleagues and students.

John Tucker: I am sending letters on behalf of my institution (where I serve as Chancellor) and as an individual.

Michelle Vale: What about students with pending OPT applications when/if this proposal goes through and is published? Will they all be automatically denied? Will they need to go back and first file an I-539 before OPT is approved? Or as long as an application is received before published rule will their application be adjudicated as normal?

Wing-kai To: MA public universities are working together.

Yocasta Brens-Watson: Working with OGC and Government Affairs

Janice Finn: Are there other statewide organizations out there who will submit letters?

Elizabeth James: @ Nancy Young- exactly. and Hi!

Elif Balin : This is the 4th time we are "trying" to have a statement of advocacy and call for comment/advocacy to be approved and published by a professional organization. The organizations hesitate to move forward by finding it "political". How do we tell the admins that there is no way to advocate without some political views to be criticized?

Jef Davis: We are working with the President's Office, Government Relations, and our State coalition of public universities to provide both an institutional comment and a consortium comment. IN addition, we are encouraging anyone who is interested to submit individual comments.

Lynne Warner: Worked with President's Alliance and will with other associations

Yasue Oneill: Yes, and we are trying to get Association of Student Government involved.

Lin Larson: @lynne warner: greetings! from lin larson

Lynne Warner: Hi Lin, where are you? Berkeley?

Rachael Weber: Yes, we are working on a letter from our institution through our office of General Counsel

Scott Pierson: UW System is working on a unified response. Additionally our Department of Justice will be submitting comments as well.

Sara Thurston: Government Relations, Graduate school, Undergraduate Admissions, Human Capital Services, International programs, International Student and Scholar Services, English Language Program working on comments together.

Joann@NAFSA: It's inspiring to see so many of you already working with your stakeholders to submit a comment letter!

Kimberly Connelly: <http://www.kumc.edu/office-of-international-programs.html> We had a statement, had an open meeting and offering recourses to help others formulate an individualized comment at KUMC

Suzanne Omran: No, we cannot sign for the institution. We are working with various units on campus: Graduate School, Athletics, English language program, and other offices and individuals as we identify them. We are preparing templated comments that are nuanced for each area we identify.

Alison Jackson: On the student affairs side now and I can definitely confirm that ANY kind of communication is better than nothing at all. Even a 'Yes, we see/read the news and have no updates" is great. Students here started a crowdsourced Google document with hours of the July 6 announcement. It was impractical but was evidence of the desperation they were feeling.

Erika Rohrbach: SUNY will be commenting, a number of SUNY campuses will comment (including FIT), & SUNY will provide a sign-on letter for anyone within SUNY to comment. Working with gov't rel'ns on this.

Elizabeth LEIBACH: Yes, a recent CDC student said 18-24 year olds have a high rate of contemplation of suicide

Alison Jackson: Our ISSO's friendly social media campaign has been really great for our students

Audra Johnston: Regulatory Fatigue - YES!

Ginger Villanueva: Anyone willing to share the message they wrote to their students?

Kelly Hughes 2: Reg Fatigue is real!

Yasue Oneill: yes, I agree!

Kara LaSota: Regulatory fatigue is real and a huge problem!!!!

Elizabeth LEIBACH: DHS is counting on the fatigue!

Jenny Bowen: 2020 fatigue

Michelle Vale: Is there an updated link to the rule that NAFSA could post? The one that was previously posted on the main NAFSA website appears to be broken now - or maybe we overloaded the system already with all of our comments and broke it :)

Erin @ NAFSA: @Michelle- the regulations.gov link goes in and out of beta mode...check the "Helpful Links" section for 2 different links...if one doesn't work, try the other

Michelle Vale: Found it - beta version

Aida Neary: reg fatigue is real and at a small school since it's just me, it's exhausting

Aubrey Winbigler 2: Very much so... fatigue :(

Jodi Simek: regulation fatigue = absolutely - schools and administrators are tired, especially those with smaller number of international students

Joanne Gilbert: So true on Regulatory fatigue!

William Mallett: I am feeling regulatory fatigue - big time.

Parker Emerson: Regulatory fatigue is real but we have to fight the fight, even if it's working over weekends, etc...

Debbie VanAtta: @Aida same here

Wing-kai To: Fatigue of everything in our field this year.

Cheryl Delk-Le Good: Yes, no assumptions that 'other people' will submit. We ALL NEED to take action on this. Everyone.

Linda Gentile: Mihaela--good reminder to vote, too!

Michelle Vale: The regulations.gov comment portal link posted is no longer valid/isn't working

Jay Deitchman: Can you please share the letter that was sent to students?

Cheryl Delk-Le Good: @Erin, how many of us are on this call?

Erin @ NAFSA: @Cheryl - we currently have 950 participants on this Town Hall

Cheryl Delk-Le Good: WOW, 950 of us on this call! Great work NAFSA!

Erin @ NAFSA: @Cheryl - Thank you to everyone who showed up! :)

Cindy McKay 2: I think the administration is intentionally pushing us to have regulatory fatigue in hopes that we will stop resisting their attack on international students!

Michael Ziadat: It seems quite harmful not only for the students but for professional in the field. There's been so much turnover lately. This just makes the pressure cooker hotter.

Kas Singh: @Cindy McKay 2 nailed it

Elizabeth James: it was interesting that DHS anticipated some pre-emptory extensions as a response to the proposed rule...

Connie Childs: VOTE VOTE VOTE VOTE VOTE!!!

Kara LaSota: How are folks doing campus advocacy without falling afoul of advocacy rules

Hunter Swanson : @Kara - We are talking with our public affairs and general counsel

William Mallett: good stuff - getting information out to international students who may need an extension is a great idea.

Shannon Bedo: @kara, do you know who your federal relations officer on campus is? That would be a good person to start with

Ari Rosner-Salazar: @Connie Childs, yaaaaas!

Kara LaSota: Hunter -- how about with students and with faculty & other campus community?

Parker Emerson: Elizabeth, I didn't catch this - when you say " DHS anticipated some pre-emptory extensions as a response to the proposed rule..." is there a page in the Fed Reg I should be looking at

Mihaela Metianu: Everyone, think of your comments here and just make sure you submit similar comments in response to the proposed rule.

Michael Lockhart: can someone remind me if pursuing multiple degrees at the same school was discussed?

Alison Jackson: @Kara - I have the same issue. I've been using my personal Twitter account and LinkedIn account. For the latter, I keep it to the facts and posting articles

William Mallett: @Connie Childs, AGREED - VOTE!

Elizabeth James: @Parker yep hold on...let me find it again...

Joann@NAFSA: Powerful collective voices!

Sam Brown: Agreed - channel this passion to the public comments as well!

Janice Finn: What are the next steps for the federal government procedures?

Janice Bianco: <https://www.nafsa.org/professional-resources/browse-by-interest/proposal-replace-duration-status>

Michael Ziadat: What is the expected timeframe for this all?

Amy Bello: Will you hold another session on the H-1B Interim Final Rules?

Erika Rohrbach: We're overwhelming the chat today. Let's do the same with our comments! COMMENT & VOTE!:))

Maria Adkins: When are the letters due?

Michelle Massey : Oct 26 deadline for comments!

Greg Wymer: Steve... do you all anticipate lawsuits?

Jenny Bowen: Please, please take the time to submit an individual comment - your voice is critical here!

Joshua Rubin: @NAFSA - How best for 3rd party providers to provide a comment letter? Where is this best submitted - especially if our global HQ is outside US?

Joann@NAFSA: They have to read every letter. Please comment!

Parker Emerson: Thank you NAFSA for excellent proposed reg digest and events like this we REALLY appreciate it. Thank you David and Steve in particular - we know that we are burdened with all of these proposals - but can't imagine the pressure on NAFSA. Thanks!!

nancy e young: Let's raise our voices together to support international students, we can do it!

Jenny Bowen: @Parker - co-sign!

Erin @ NAFSA: All of these links are available in the Helpful Links section and will be included in the transcript that will be posted on the website.

Alison Jackson: add quotes from students and sample student cases (anonymous, of course)

Cheryl Delk-Le Good: And if you're in ESL/pathway, check out our page as well for some English language program specific comments. <https://www.englishusa.org/page/TakeActionOctober2020>

Elizabeth James: @ Parker- pg. 60541, Middle column ...I'll email it to you