

Model Public Comment Template

This is a model comment that can be personalized, shortened, or expanded. It is written to be submitted as a private citizen and does not reference professional roles or institutions. Comments may be submitted anonymously through the Federal Register website. Unique, original comments are most impactful.

Re: DHS 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”* (RIN: 1653-AA95 / ICEB-2025-0001)

To Whom It May Concern:

I write to oppose the proposal to eliminate *duration of status* (D/S) for F, J, and I visa holders in favor of fixed admission periods. This change would impose serious, unnecessary harms for students, universities, communities, and the United States as a whole.

Key concerns include:

- **Loss of global talent and competitiveness:** International students deterred from studying in the U.S. will choose other destinations, reducing academic contributions, innovation, and long-term economic benefit.
- **Economic impact:** Universities, local communities, and industries rely on international students' tuition, living expenses, and research activity. Curtailing flexibility will reduce enrollment and weaken local economies.
- **Administrative inefficiency:** Requiring USCIS to process a high volume of extension applications adds cost, bureaucracy, and delays, straining federal resources without necessity.
- **Repeating an academic level:** Preventing students from pursuing a second degree at the same level ignores legitimate academic and professional pathways. For example, engineers seeking MBAs to lead in industry would be unfairly restricted.
- **Misuse justification overstated:** DHS cites isolated abuses, but Designated School Officials (DSOs) already identify and terminate fraudulent cases. The current system effectively manages compliance.

For these reasons, I respectfully urge DHS to withdraw or substantially revise the proposed rule. Less restrictive alternatives exist that preserve oversight while protecting students, institutions, and the United States' position as a global leader in higher education.

Sincerely,
[Your Name or 'A Concerned Citizen']