

## Guidance for Submitting Public Comments on Proposed Rule for F-1 Students

**Deadline:** Monday, September 29, 2025 – Midnight (ET)

**Submit at:** [Federal Register](#)

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### What's Changing?

The Department of Homeland Security (DHS) has proposed replacing “**Duration of Status (D/S)**” with a **fixed 4-year admission period** (or less, depending on the program end date listed on your Form I-20).

This would mean:

- If your program takes longer than 4 years, you must file an **Extension of Stay (EOS)** with USCIS.
  - USCIS officers (not schools) would decide if your extension is approved.
  - Certain changes, like switching majors, educational levels, or starting another degree, may be restricted.
  - The rule could make it harder for students in **Ph.D., STEM, medical, or dual-degree programs** to finish their studies without extra paperwork and costs.
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### Comment Structure

When writing your comment:

1. **Cite the specific section** of the rule (e.g., “Proposed Amendment to 8 CFR 214.2”).
  2. **State your concern** (why it’s harmful or doesn’t work).
  3. **Provide an example or data** (personal experience, research, or stats).
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### Example Comment Templates

#### Example 1 – Undergraduate Student

**Specific Section:** Proposed 8 CFR 214.2 – Four-Year Admission Limit

**Reason for Suggestion:** A fixed 4-year admission is not enough time for most bachelor’s students. According to the National Center for Education Statistics, the median time to complete a bachelor’s degree is 52 months (4.3 years).

**Example:** At my university, many students take longer because of internships, study abroad, or changing majors. This rule could force me to apply for an extension and pay extra costs even if I am making normal academic progress.

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### Example 2 – Ph.D. Student

**Specific Section:** 8 CFR 214.2 – Limiting Extensions

**Reason for Suggestion:** Ph.D. programs regularly take 5–7 years to complete, especially in STEM fields. The proposed 4-year limit does not reflect reality.

**Example:** In my field (engineering), most students require more than 4 years for coursework, research, and dissertation. Forcing extensions would create uncertainty and make U.S. programs less attractive compared to Canada or Australia.

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### Example 3 – Medical or Dual-Degree Student

**Specific Section:** 8 CFR 214.2 – Program Duration Limitations

**Reason for Suggestion:** Medical degrees and dual-degree programs often exceed 4 years.

**Example:** A medical student may require 6–8 years to finish training. This rule would add unnecessary cost and stress, while schools already monitor student progress through SEVIS.

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### Example 4 – Changing Programs

**Specific Section:** 8 CFR 214.2(8)(iii) – Restrictions on Changing Educational Objectives

**Reason for Suggestion:** Students should be allowed to change majors or educational levels. The proposed rule is too restrictive.

**Example:** If a student starts in business but discovers a passion for computer science (STEM), they should be able to switch without penalty. This rule discourages academic growth and flexibility.

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### Why Your Voice Matters

- DHS must respond to **substantive comments** that cite sections, explain reasons, and give data/examples.
- Personal stories (without private details) are powerful evidence.
- Comments can be anonymous — what matters is **showing real impacts on students' lives.**