

May 13, 2020

The Honorable Mike Pompeo
Secretary
U.S. Department of State
Office of the Secretary
Washington, DC 20520

The Honorable Chad F. Wolf
Acting Secretary
U.S. Department of Homeland Security
Office of the Secretary
Washington, DC 20528

Dear Secretary Pompeo and Acting Secretary Wolf,

On behalf of the Council of Graduate Schools (CGS), I would like to share the following recommendations and requests concerning the impact of the coronavirus pandemic on the international graduate student community and U.S. institutions of higher education (IHEs). For nearly six decades, CGS has served as the national organization dedicated to advancing graduate education and research.

CGS's membership includes nearly 500 institutions of higher education in the United States, Canada, and abroad. Collectively, our members grant 87 percent of all U.S. doctorates and the majority of U.S. master's degrees. CGS also conducts an annual International Graduate Admissions Survey, which develops the only report of its kind offering data on the current academic year's applications, admissions, and enrollments of international master's, certificate, and doctoral students at U.S. institutions. According to the Fall 2019 report,¹ 271,619 international graduate students were enrolled in U.S. IHEs that completed the survey for the Fall 2019 admissions cycle.

The COVID-19 pandemic has imposed numerous challenges that our institutions are now trying to navigate, especially when considering the pipeline of international graduate students, scholars, and faculty. From discussions with the deans and chairs of the graduate schools within our member institutions, it is apparent that support for graduate students, both domestic and international, is of utmost importance. Ensuring that graduate programs and the overall institution can continue to serve students at this time, while also keeping in mind future enrollment, are issues that are also inherently embedded in sustaining ongoing research efforts and preparing the future workforce.

International students offer a wide range of contributions to the U.S. economy, research enterprise, and surrounding communities. The U.S. economy alone is significantly affected by international students. During the 2018-2019 academic year, international students studying at U.S. colleges and universities contributed \$41 billion to the U.S. economy and supported 458,290 jobs.² Although international graduate enrollment has shown increases for Fall 2019, overall international student

¹ Zhou, E., Mitic, R.R., West, C.P.L., & Okahana, H. (2020). International graduate applications and enrollment: Fall 2019. Washington, DC: Council of Graduate Schools.

² The Economic Value of International Student Enrollment to the U.S. Economy. Washington, DC: NASFA: Association of International Educators. Retrieved from: <https://www.nafsa.org/policy-and-advocacy/policy-resources/nafsa-international-student-economic-value-tool-v2>

enrollment has declined since 2016 which has cost the U.S. economy \$11.8 billion and more than 65,000 jobs.² International students are also vital to maintaining a competitive U.S. research enterprise in critical areas of quickly developing research. Moreover, our international graduate student population promotes the exchange of ideas, cultural values, and collaborative intellectual and research efforts that foster mutual respect and long-lasting professional relationships. These support the basic foundation of diplomacy.

We appreciate what guidance the Department of State (DOS) and the Department of Homeland Security (DHS) have released thus far regarding F1, M1, and J1 visas and related issues. However, as the COVID-19 pandemic continues to unfold, additional clarification, guidance, and flexibility will need to be addressed. We offer the following recommendations as you prepare additional guidance and bring to your attention other challenges brought on by the pandemic.

Continued Flexibility for Distance Education

Follow up on guidance issued mid-March related to distance education offers flexibility for international students to take courses remotely.³ Additionally, an FAQ document published on April 30 notes that full course of study requirements are able to be waived due to impact of the pandemic.⁴ The COVID-19 Guidance for SEVP Stakeholders provided by U.S. Immigration and Customs Enforcement notes the “temporary provision is only in effect for the duration of the emergency and in accordance with the procedural change documents filed in a timely manner to SEVP.” It is unclear at this point what constitutes “duration of emergency” given what is still unknown about the pandemic’s trajectory.

With the likelihood of the COVID-19 pandemic severely impacting higher education into the fall, IHEs may find the need to extend distance education into the upcoming 2020-2021 academic year. We believe that remote learning flexibilities should continue in order to accommodate international graduate students continuing in their studies as well as provide prospective international graduate students the ability to enroll in the fall semester. With these considerations and the uncertainty of the duration of the emergency, we recommend the flexibilities for distance education be clarified to extend through the next academic year.

Timely Processing of Visas

U.S. Citizenship and Immigration Services (USCIS) employees have been providing mission-essential services that do not require face-to-face contact with the public to help slow the spread of coronavirus. With USCIS preparing to reopen offices at the beginning of June, there is great urgency in ensuring that visa processes are timely and feasible for international graduate students, faculty, scholars, and researchers. As USCIS offices reopen, we request that DHS and DOS grant flexibility for F-1 and M-1 visa processes to ensure that these individuals can participate in their programs.

Moreover, we believe that the face-to-face interview should be waived for obtaining an F-1 or M-1 student visa, should they be able to physically be present in the United States. This flexibility would allow for timely processing of student visas as students face travel restrictions or social distancing

³ U.S. Immigration and Customs Enforcement. (March 2020). COVID-19: guidance for SEVP stakeholders. Retrieved from: https://www.ice.gov/sites/default/files/documents/Document/2020/Coronavirus%20Guidance_3.13.20.pdf.

⁴ U.S. Immigration and Customs Enforcement. (April 2020). Frequently asked questions for SEVP stakeholders about COVID-19. Retrieved from: <https://www.ice.gov/doclib/coronavirus/covid19faq.pdf>.

requirements. The swift processing of student visas will reassure prospective graduate students and higher education faculty and staff that students can enroll and participate in the Fall 2020 semester. We urge DHS and DOS to prioritize student visas once USCIS begins to resume normal operations.

Temporary Extension for those Currently on F-1, M-1, and J-1 Visas

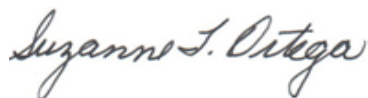
In addition to prospective international graduate students, current international students completing programs this spring and summer may need visa flexibilities due to COVID-19. Several international graduate students are finishing graduate or professional degree programs in May and June of 2020. The array of travel restrictions in place during the global coronavirus pandemic have left some international students unable to return to their home country after graduation. Flexibilities with student visas allow international students to comply with student visa guidelines while safely remaining in the U.S. as a result of COVID-19 restrictions. Current research scholars and faculty on J-1 visas may also face the same challenges in returning to their home countries. We urge DHS to provide temporary visa extensions for those who are incapable of returning home after their education program in the U.S. has been completed.

Optional Practical Training (OPT)

We request that Optional Practical Training remain a viable opportunity for international students to gain work experience directly related to their field of study. In order to do so, we ask that USCIS, along with SVEP, work to address questions from the higher education and business community about how students, IHEs, and employers can remain engaged in OPT. We recommend that there be an additional grace period granted for students who may face unemployment due to the pandemic. Currently, students on OPT who accumulate 90 days of unemployment must leave the U.S. Granting flexibility for the application process (for example, allowing student be able to apply for OPT if they are not physically present in the U.S.), as well as timely processing of OPT authorization are critical, and we would appreciate additional guidance on these issues as well.

Again, CGS thanks you for your efforts to provide preliminary guidance on student visas and institutional processes regarding international graduate students. We stand ready to assist as the Administration continues to put forth additional guidance. If your departments have questions, or if we can be of service, please do not hesitate to contact our Vice President of Public Policy and Government Affairs, Lauren Inouye, at Linouye@cgs.nche.edu.

Sincerely,



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