



September 16, 2018

Sharon Snyder
Unit Chief, Student and Exchange Visitor Program
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th St. SW
Washington, DC 20536

**RE: Adjusting Program Fees for the Student and Exchange Visitor Program
(Docket No. ICEB-2017-0003)**

Dear Ms. Snyder,

On behalf of the Council of Graduate Schools (CGS), I appreciate this opportunity to submit the following comments regarding the proposed adjustment of program fees for the Department of Homeland Security's (DHS) Student and Exchange Visitor Program (SEVP); Docket No. ICEB-2017-0003. For more than five decades, CGS has served as the national organization dedicated solely to advancing graduate education and research—our membership includes over 500 institutions of higher education in the United States, Canada, and abroad. Our institutions award the majority of U.S. doctoral and master's degrees. Among our member schools, there are over 300,000 international students pursuing master's and doctoral education.

CGS understands that the costs required to sustain the operation and management of SEVP and the Student Exchange Visitor Information System (SEVIS) are not static from year to year. Further, CGS acknowledges that it is under DHS's purview to adjust certain fees associated with SEVP. More specifically, fees would be increased from \$200 to \$350 (75 percent) for F and M visas and from \$180 to \$220 (22 percent) for J visas. Institutions of higher education would face a \$1,300 increase (76 percent) for initial I-17 certification. Additionally, institutions would face two new fees: a \$1,250 fee to submit a re-certification petition and a \$675 fee to submit an appeal or motion following a denial of withdrawal of a school petition. These increases and new fees may create negative, unintended consequences. While CGS supports timely and accurate processing of F, M, and J nonimmigrant visas, we also believe that the proposed increases could impede the recruitment of international students by U.S. colleges and universities.

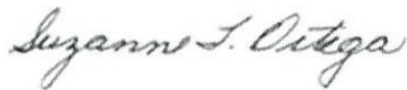
The proposed changes in fee levels are among recent efforts to alter policies affecting the international higher education community. As a collective, these actions may hurt the competitiveness of the U.S. as a preferred destination for top international talent. Data from AY 2016-2017 suggest that institutions may already be experiencing this issue. According to CGS data, among graduate programs, the final application counts from prospective international graduate students declined by 3 percent, while first-time enrollment of

international graduate students declined by 1 percent.¹ Moreover, the National Science Foundation data show a 5.5 percent drop in international graduate students in science and engineering between Fall 2016 to Fall 2017—two fields of study that attract a high proportion of the total number of international students in the U.S.² Increasing visa processing fees could exacerbate this chilling effect, further eroding our ability to remain a welcoming environment for international collaboration.

The strength of our nation's graduate education depends upon both domestic and international scholarship. International faculty and students are vitally important to U.S. graduate education and research enterprise. According to NAFSA: Association of International Educators, international students (both graduate and undergraduate) contributed nearly \$37 billion to the U.S. economy in AY 2016-2017 alone.³ Additionally, domestic students benefit from the experience of training alongside international students, gaining the cultural competence needed to be competitive in a global economy.

At a time when competition for attracting international students is high, CGS believes that immigration policies should not make it more difficult for international students to participate in U.S. graduate education programs. Increasing SEVP fees has the potential to have this type of unintended effect. Instead, enacted policies should increase the likelihood that international students can remain in the U.S. upon graduation and continue contributing to innovative research and the economy. We thank you for your consideration of these comments. CGS is committed to maintaining the best and brightest domestic and international talent, and hope that we can be a resource to you when considering matters that impact graduate education.

Sincerely,



Suzanne T. Ortega
President

¹ Okahana, H., & Zhou, E. (2018). [International graduate applications and enrollment: Fall 2017](#). Washington, DC: Council of Graduate Schools.

² National Science Board. (2018). Science and Engineering Indicators 2018. Retrieved from: <https://www.nsf.gov/statistics/2018/nsb20181/report/sections/higher-education-in-science-and-engineering/graduate-education-enrollment-and-degrees-in-the-united-states#graduate-enrollment-by-field>.

³ NAFSA: Association of International Educators. (n.d.). NAFSA international student economic value tool. Retrieved from: https://www.nafsa.org/Policy_and_Advocacy/Policy_Resources/Policy_Trends_and_Data/NAFSA_International_Student_Economic_Value_Tool/.