



Ensuring Homeland Security through International Student Success

December 2023

The Ask:

The United States requires an immigration process that recognizes international students' key role in U.S. national security and innovation while reflecting our values as a welcoming and inclusive nation. Higher education institutions and international students deserve confidence that policies within and among agencies will align with and be recognized across the federal government.

To that end, we urge the Department of Homeland Security (DHS) to champion the importance of international students by consistently articulating their value; effectively coordinating within the agency and with other federal agencies; improving technology to eliminate bureaucratic burdens on the agencies, higher education institutions, and international students; and developing and implementing training to advance these goals.

Background:

- Competing and cooperating on the global stage for international student talent requires a whole-of-government approach. The Department of Homeland Security's leadership should therefore publicly and consistently articulate the importance of international students to our nation's security, economy, and culture. DHS oversees the Student and Exchange Visitor Program (SEVP), plays a key role in coordinating visa policy with the U.S. Department of State, and manages immigration-related processes. Therefore, the agency has a responsibility to outline a vision for how it will best align its policies, processes, and resources to benefit international students.
- Lengthy and unpredictable processing times turn fairly straightforward processes, like change of status, extension of status, or application for an employment authorization document, into risky and legally complex situations with possible harsh consequences for students.

- Lack of intra- and inter-agency coordination and sharing and management of data collected through forms, petitions, and case management systems requires students to file duplicative and often burdensome paperwork with various agencies.
- While DHS has made some improvements in technology, in order to meet current and future demands, the agency must better serve applicants across sub-agencies, make a continuous, concerted effort to develop and implement technological improvements, reduce the paperwork burden, and avoid duplicative filings.

Recommendations:

- **Champion the importance of international students** by consistently articulating their value.
- **Endorse and help implement the USG's [Joint Statement of Principles in Support of International Education](#).**
- **Meet regularly with our community** to discuss issues affecting our ability to compete globally for international student talent.
- **Improve USCIS processing** so that international students can proceed with their education and work post-graduation with less uncertainty and fewer obstacles. USCIS should prioritize predictable processing times and technological improvements to ensure reasonable and reliable processing times which are critical to ensuring maintenance of status.
- **Improve both intra- and inter-agency sharing and management** of data collected through forms, petitions, and case management systems to enhance agency efficiency and reduce the burden on applicants and petitioners.
- **Continue to authorize Special Student Relief (SSR)** for students whose home countries are experiencing crises that place the student under financial hardship, requiring them to take on more work opportunities. The coalition appreciates that the USG has granted SSR at the same time that it has designated countries for Temporary Protected Status (TPS), and we urge DHS to continue this practice when announcing TPS or Deferred Enforced Departure (DED). We also urge the Department to move expeditiously to publish the necessary Federal Register announcements for these forms of relief, to clarify how they can benefit international students, and to process applications expeditiously. For example, students applying for SSR whose country of origin has already been identified as a TPS- or SSR-eligible country should not have to prove individual severe economic hardship.

- **Strengthen and reaffirm Optional Practical Training (OPT).** OPT offers an experiential learning opportunity that serves as a key feature of the U.S. higher education experience and is attractive to many prospective international students. Any changes to the program should encourage, not deter, prospective international students from choosing the United States for their degrees. As we commend the administration for adding 22 new fields of study to the STEM OPT program, we encourage the administration to take the expansion a step further to include health-related fields.
- **Ensure H-1B regulations serve as a pathway** for international students whose training and skills are in demand. Upon graduation, many international students transition to other legal pathways, as employers seek to hire individuals who graduate from U.S. colleges and universities with the knowledge and skills needed in our economy. DHS should ensure that any regulations promulgated to modernize the H-1B program provide viable options for new graduates to use the program as a stepping stone in their immigration pathway.
- **Integrate stakeholder engagement** to benefit the agency while maximizing the user experience and providing transparency. For example, SEVP should return to the practice of issuing guidance in draft form for stakeholder feedback, which gains the agency valuable input and avoids unintended consequences. Engage regularly with key stakeholders to discuss issues and share progress.
- **Coordinate with other federal agencies**, such as the Departments of State and Labor, on all aspects of visa processing and immigration benefits to maximize efficiencies, reduce confusion, and increase predictability. Strengthen national security by [making permanent visa interview waiver authority](#) for applicants who have already been vetted.
- **Develop and implement coordinated policy and practice** across DHS bureaus to allow for greater efficiencies in filings and processing.
- **Use the Homeland Security Academic Partnership Council to welcome and support international students and to ease their transition into U.S. careers post-graduation.** We applaud Secretary Mayorkas's decision to reconstitute this Council, which in the past has provided significant value to DHS as a higher education venue to share best practices, recommendations, and other policy change suggestions at the intersection of higher education and immigration (especially regarding international students). To combat negative perceptions of international students, the

Council should prioritize articulating the importance of attracting and welcoming international student talent from around the globe.