

Katherine Bergeron President

October 26, 2020

Chad Wolf Acting Secretary U.S. Department of Homeland Security 301 7th Street, SW Washington, DC 20528

Sharon Hageman Acting Regulatory Unit Chief Office of Policy and Planning U.S. Immigration and Customs Enforcement U.S. Department of Homeland Security 500 12th Street SW Washington, DC 20536 R

Dear Acting Secretary Wolf and Acting Chief Hageman,

I am writing, as President of Connecticut College, to express the College's strenuous opposition to the rule recently proposed by the U.S. Department of Homeland Security ("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," DHS Docket No. ICEB-2019-0006-0001). We view the regulation as unnecessarily punitive, short-sighted, and injurious to our international students, to our community, and to the future position of the United States.

Connecticut College is a century-old private liberal arts institution located in New London, Connecticut, in close proximity to the United States Coast Guard Academy, with whom we enjoy a robust academic partnership. Our student body of 1750 students includes each year approximately 150 international students living and working on F1 visas.

The new DHS rule proposes to reach needlessly into academic matters that are already well regulated at our institution. Connecticut College annually provides the Department of Homeland Security with substantial amounts of data about every person studying on the F1 Visa, a level of oversight that far surpasses that of any student in the general population. The College also follows rigorous procedures for all students who may need additional time to complete their degree. Requiring the federal government, rather than the College, to decide whether our international students are making good academic progress represents a wholly unprecedented, unwarranted, and harmful intrusion into well-established decision-making policies and practices at the College.

Our international students are among the brightest, most talented, ambitious, entrepreneurial, humanitarian, respectful, and civic-minded members of our community. As they fulfill the College's unique mission of putting the liberal arts into action, they bring immense value to our classrooms, to our campus life, to our local region, and to the world. Recent international graduates from Connecticut College have served at the

United Nations, led successful non-profit organizations, and made the Forbes "30 under 30" list for their contributions to society.

Placing burdensome restrictions on a class of students already making swift and satisfactory progress toward their degree is not only unjustifiable and unjust; it will also have deleterious long-term effects on international educational exchange, further weakening the position of the United States in research productivity, in the preparation of a global workforce, and in international diplomacy. For all these reasons, we urge you to overturn DHS Docket No. ICEB-2019-0006-0001.

We respectfully submit this public comment for your immediate attention.

Sincerely,

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Katherine Bergeron