

September 25, 2025

**Submitted via [www.regulations.gov](http://www.regulations.gov)**

U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
500 12th Street, SW  
Washington, D.C. 20536

Re: DHS Docket No. DHS Docket No. ICEB-2025-0001

To Whom It May Concern:

On behalf of Boston University (BU), we submit this comment letter in opposition to the Department of Homeland Security's (DHS) proposed rule 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-2025-0001). BU is a leading private research institution with over 37,000 students and during the 2024-2025 academic year, we hosted approximately 12,000 F-1 students and 700 J-1 exchange visitors. The proposed rule would hurt our international students and scholars, who are vital members of the BU and U.S. community, undercut our ability to attract and retain the best talent in the world, and hold back our country's economy and global competitiveness. We strongly urge that the proposed rule be withdrawn in its entirety and F-1 students and J-1 exchange visitors continue to be admitted for the duration of their status.

**The proposed rule would increase uncertainty and impose additional burdens for international students and scholars**

**Uncertainty caused by immigration officers making academic decisions and extension delays**

Admission for duration of status gives international students, who greatly contribute to U.S. competitiveness, the critical ability to progress in their academic careers, through different levels of education as well as possible changes in field of study or institution, much as their American peers can. It gives our international scholars and the academic departments that host them confidence that the scholars will be able to see to completion the research projects and teaching assignments upon which the American innovation ecosystem relies. Designated school officials and responsible officers grant program extensions, as warranted, consistent with DHS and Department of State regulations. Under the proposed rule, however, a United States Citizenship and Immigration Services (USCIS) officer, with no knowledge of the specialized fields in which our international students study or our international scholars teach and conduct research, would decide whether to issue an extension of stay (EOS). This would inject uncertainty into the work of scholars and the academic careers of students, including those who wish to engage in post-completion Optional Practical Training (OPT).

**Uncertainty because the proposed four-year maximum admission period does not reflect the time required to complete academic programs**

The proposed rule would limit the admission period for international students and scholars to a maximum of four years. However, the National Science Foundation reports a median of 5.7

years for students completing a doctoral program,<sup>1</sup> which is identical to the median time to completion for PhD students at BU. In addition, numerous individual and dual degree programs at BU take more than four years to complete, particularly in programs in the medical sciences, where students must acquire extensive knowledge as well as hands-on clinical experience.<sup>2</sup> Students enrolled in one of these programs would need to file an EOS application with USCIS to complete their program in the minimum amount of time. Other students and scholars would be required to request an EOS if they need more time to complete their studies, training, or assignments. This would create significant uncertainty for students, particularly those enrolled in a PhD, dual degree, or other lengthy programs, who would have no guarantees about their ability to complete their academic programs. Under the proposed rule, critical research initiatives and teaching could be jeopardized because professors and scholars would have to apply for an EOS mid-program without any certainty that they would be able to complete projects or instruction for which they were hired.

### **Administrative and economic burdens make the process more challenging and costly**

According to the proposed rule, the annualized costs burden on the international community for EOS application fees, time, and assistance is up to \$304.3 million. Notably, the fees for filing an EOS application would be in addition to what international students and scholars already pay to the federal government to engage in their programs, including the student and exchange visitor information system (SEVIS), visa, and employment authorization fees. The process of applying for an EOS, including travel with dependent family members to a USCIS Center to provide biometrics, is another significant burden for this group.

### **The proposed rule would place significant and harmful restrictions on academic mobility**

The rigid provisions in the proposed rule prevent major or program changes to varying degrees for undergraduate, graduate, and professional students and prohibit continuing education if it's at the "the same" or "lower" level. This ignores the academic exploration that is natural and vital to higher education. At the graduate level, admission to several of our combined degree programs is limited to students already enrolled in one of the degree programs, like our Master's in Business Administration and Doctor of Medicine dual degree program. It is also common for a student who has obtained a graduate degree in a general field of study subsequently to pursue more specialized training in a program, yet it is unclear whether a USCIS officer would consider that specialized training to be "at a higher educational level." For instance, a dentist with a Doctor of Dental Medicine degree may pursue a Certificate of Advanced Graduate Study at BU in Pediatric Dentistry, Geriatric Dental Medicine, Endodontics, or another specialized field to learn how better to serve a particular population, prepare to seek board certification, or to become a leader in the field.<sup>3</sup> Similarly, a teacher with a Master of Education degree may pursue a graduate certificate at BU in Chemistry Education, Physics Education, Autism & Emotional/Behavioral Disorders, or another field.<sup>4</sup> In addition, PhD students sometimes decide to discontinue pursuing the degree, changing their program of study to a master's degree in the

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<sup>1</sup> <https://nces.gov/surveys/earned-doctorates/2023#data>

<sup>2</sup> For example, our MD/PhD program requires a minimum of seven years to complete, our MD/JD and MD/Oral & Maxillofacial Surgery (OMFS) programs require a minimum of six years, and our MD/MPH, MD/Master of Science in Clinical Research (MSCR), MBA/MD, and a number of our Doctor of Science in Dentistry (DScD)/Certificate of Advanced Graduate Study (CAGS) programs take five years.

<sup>3</sup> <https://www.bu.edu/academics/sdm/programs>

<sup>4</sup> <https://www.bu.edu/wheelock/academics-professional-development/graduate-programs/professional-programs>

same field. The proposal does not provide enough flexibility to accommodate various academic situations and would adversely affect international students and scholars.

**The loss of international students and scholars would harm the United States economy and competitiveness**

International students contribute to our local communities, support hundreds of thousands of jobs, and often play an active and important role in the United States' ability to lead, sustain and enhance innovation that ensures the strength of the American economy. In addition, fortune 500 companies and small businesses have benefited from the knowledge and expertise of individuals who came to the United States from other countries. Indeed, international student alumni have founded a quarter of the billion-dollar start-ups in the United States,<sup>5</sup> and the CEOs of Microsoft, NVIDIA, and Google all came to the U.S. for their education. Disincentivizing international students and scholars from coming to the country could have long-term negative economic consequences should they seek out alternative destinations.

We must ensure that the United States continues to welcome the best and brightest minds, who are critical to our communities, our leadership in higher education and research, and our country's economy and global competitiveness. Accordingly, we again urge that the proposed rule be withdrawn in its entirety and that admission under the current duration of status framework remain in effect.

Sincerely,



Melissa Gilliam  
President



Gloria Waters  
University Provost & Chief Academic  
Officer

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<sup>5</sup> <https://nfap.com/wp-content/uploads/2022/07/Immigrant-Entrepreneurs-and-Billion-Dollar-Companies.DAY-OF-RELEASE.2022.pdf>