



September 17, 2018

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

RE: Docket No. ICEB-2017-0003, Document No. 2018-15140

Dear Ms. Snyder:

As organizations committed to advancing excellence in English language education and fostering welcoming environments for English learners, TESOL International Association (TESOL), EnglishUSA, and the Consortium of University and College Intensive English Programs (UCIEP) have serious concerns regarding the U.S. Department of Homeland Security's proposal to increase a number of international student fees collected by the Student and Exchange Visitor Programs (SEVP). While we understand that by statute SEVP must be self-funding and therefore needs to implement fees in order to fund its operations, we believe that such a significant increase in fees will have a number of negative consequences. In addition to creating additional financial barriers that will serve as a disincentive for students to study in the U.S., the proposed significant fee increase sends a signal to international students that they are not welcome. This could further reduce the number of international students who enroll in higher education institutions and English language programs and therefore contribute to the national and local economies.

The United States is the current global leader in international education and cultural exchange, and welcomed over a million international students attending institutions of higher education and intensive English programs (IEPs) in the last academic year. With this proposal, however, the U.S. risks losing its competitive advantage to other countries that also cultivate international students. For example, in Canada, a direct competitor to the U.S., international student fees and visas are different for short and long-term programs, and are coupled with a more welcoming environment for international students. This proposal is particularly concerning as it does not take into account the length of a student's stay or the cost of the program. The proposed 75% increase for the F visa fee will have a proportionally greater impact on students preparing for short-term programs such as English language study than on those students preparing for long-term post-secondary programs.

International students add over \$39 billion to the U.S. economy, helping to create many jobs in the communities in which they study. At public higher education institutions, the tuition from international students also helps to defray the tuition costs for in-state students. With the potential for these increased fees to reduce the number of international students who study in the U.S., the substantial contributions that they make to the U.S. economy could be noticeably diminished.

While the Department’s proposal outlines the increased fees for international students, it does not provide a detailed explanation as to what these new fees will help cover or how they will improve services provided by SEVP. For example, will the increased fees be used to reduce adjudication time? Will they be used to increase the number of SEVP staff or provide additional staff training? Additionally, will the funds collected be used for any services outside of SEVP’s scope? It is our hope that the Department can answer these questions before moving forward with the current proposal.

International students are a valuable resource, and not a commodity that can be taken for granted in a global economy. We urge the U.S. government to support all international students by facilitating access to high-quality education, including IEPs, and express our collective concern over any efforts to construct financial barriers that would hinder academic opportunities for students to study in the U.S. and contribute to local economies across the country.

Sincerely,

Cheryl Delk-Le Good
Executive Director
EnglishUSA

Christopher Powers
Executive Director
TESOL International Association

Megan Forbes
President
UCIEP