



Office of the President

September 29, 2025

Todd M. Lyons
Acting Director
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th St SW
Washington, DC 20536

Docket No: ICEB-2025-0001

Dear Acting Director Lyons:

We write in response to the U.S. Immigration and Custom Enforcement's 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. Our comments focus on how this rule would negatively impact international college students, including their ability to successfully complete a degree and approved post-completion work authorization time. Southern New Hampshire University (SNHU) is a private, nonprofit, accredited institution with a 92-year history of educating traditional-aged students and working adults. With more than 3,700 students enrolled on its Manchester, New Hampshire campus, SNHU currently supports 767 F-1 students and 10 J-1 students who are either enrolled or completing their authorized post-graduation employment.

Currently, international students with an F (academic student) visa have duration of status (D/S) permitting them to remain in the United States through the completion of their college degree, plus approved post-completion work authorization time under the Practical Training regulations. International students are the most tracked group of nonimmigrants in the United States, with full visibility of their study, program advancement, and off-campus employment tracked through the Student and Exchange Visitor Information System (SEVIS).

The existing D/S provides needed flexibility, including for students who may take longer to complete their undergraduate degree, students who pursue an advanced degree after completing an undergraduate degree, doctoral students, and students who seek employment opportunities after graduation where their experience and expertise contributes to the local, state, and national economy. Changing the academic F status D/S to a set four-year period would limit international students' educational and professional options, hinder some students' ability to finish their degree, and deter some students from enrolling all together.

While the proposed rule allows F visa holders to seek a D/S extension beyond the set 4-year period, the approval process would create uncertainty among visa holders about their legal status and ability to travel outside of the United States during the consideration period. Should the administration move forward with the proposed rule, any extension option should have clear parameters and not solely be at the discretion of visa reviewers. We urge you to consider clear criteria on when an extension will be granted, such as for the time needed for a student to complete their current degree program, the duration of a student's graduate degree program, and the waiting period for Optional Practical Training (OPT) adjudication.

The proposed rule also includes a reduction to the existing post-graduation grace period, from 60 to 30 days – the amount of time international students have to transition between visa statuses or leave the country. The current 60-day period allows for necessary flexibility when recent graduates are transferring to another higher education degree program, as many programs require the verification of completion of the prior degree for admission to a higher degree level program, or waiting for approval of a new visa status. In many cases, 30 days is not enough time for an international student to be accepted to an advanced degree program, or apply and get approval for OPT status employment, allowing them to work temporarily after graduation. The 60-day grace period is also important considering other new visa application requirements which will likely result in longer approval and interview scheduling wait times.

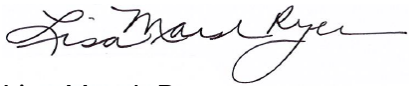
Colleges have an obligation to provide support to all learners, including international students. In that role, colleges must be able to advise students to pursue academic programs and courses that align with their career goals, as well as their personal expertise and skillset. Under the proposed rule, international students would no longer be able to change their declared degree during their first year of enrollment. This change would put inappropriate limitations on college advising and impact some students' academic success. For example, if a first-year

engineering student is struggling with core math courses, a change in major is likely the best option in order for the student to successfully finish a bachelor's degree. Under the newly proposed rule, international students would be required to remain in their current major and take courses that will not apply to their ultimate degree, resulting in longer degree completion time.

International students are a vital part of the SNHU community. Eliminating D/S is unnecessary and potentially burdensome for colleges and USCIS. We urge you to not put undue barriers on international students that would limit their access and success while pursuing higher education.

Thank you for your consideration of our comments on these matters.

Sincerely,

A handwritten signature in black ink, reading "Lisa Marsh Ryerson". The signature is fluid and cursive, with the first name "Lisa" being the most prominent.

Lisa Marsh Ryerson
President