Office of the President

November 5, 2026

David J. Venturella
Acting Director
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th St SW
Washington, DC 20536

Docket No: ICEB-2026-0100

Dear Acting Director Venturella:

We write in response to the U.S. Immigration and Customs Enforcement's proposed rule, Optional Practical Training (OPT) Fees. Our comments focus on the importance of the OPT program for employers and higher education and how this rule would effectively eliminate the program. Southern New Hampshire University (SNHU) is a private, nonprofit, accredited institution with a 92-year history of educating traditional-aged students and working adults. SNHU has a unique structure, serving over 200,000 learners online and 3,700 learners on our campus in Manchester, New Hampshire.

On our campus, SNHU currently supports 7 J-1 student visas and 598 F-1 student visas, including learners in OPT and STEM OPT. Bipartisan in its inception and expansion, the OPT program was created as a bridge between education and employment visas for international students who attend college in the United States and can help fill gaps in the American workforce. At SNHU, our students engage in programs that largely serve a high skill need related to Computer and Information Science and Management Sciences and Quantitative Methods program majors. Enabling international students to participate in temporary roles through OPT gives employers an opportunity to determine if they are filling a critical need, and if appropriate, pursue longer term employment. By putting in place high fees to participate in the OPT program, the proposed rule threatens to cut off this talent pipeline for employers.

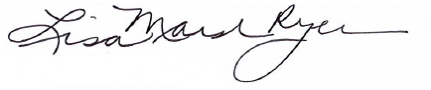
In addition to workforce implications, undermining the OPT program will negatively impact the international student experience. Higher education programs are the most valuable when they set learners up for success in their future careers. This

path is most successful when students have access to robust career activities, including work-based learning. International students are only able to fully realize these opportunities through the OPT program, which allows them to work in paid and unpaid temporary positions that directly relate to their program curriculum. While the proposed rule implies that colleges would pay for the newly proposed fees, the cost would be passed on to international students participating in the program through tuition and fees. Given the high cost of these fees, it is unlikely that international students would be willing or able to pay. An inability to cover these costs by institutions and learners would effectively end the OPT program. Losing OPT as a part of the U.S. higher education experience will lead to more international learners choosing to pursue their degrees elsewhere, exacerbating the lost revenue due to the ongoing decline in international student enrollment across the higher education sector and at SNHU.

International students play a vital role at our university and should be able to participate in education-related activities, including career connectivity, like any other student. If enacted, these proposed fees would reduce employers' access to U.S.-educated talent, weaken institutional and regional economies, and make American higher education less competitive globally. I urge you to withdraw the proposed rule.

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

Sincerely,



Lisa Marsh Ryerson
President