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February 28, 2022

Johanna Cruz, Management Analyst
Office of the Comptroller
Bureau of Consular Affairs
U.S. Department of State
2201 C Street, NW
Washington D.C. 20520

Re: Docket Number DOS-2021-0019

Dear Ms. Cruz:

The American Council on Education (ACE) and the undersigned higher education associations submit these comments in response to the Docket Number DOS-2021-0019 regarding proposed adjustments to the Bureau of Consular Affairs' Schedule of Fees for Consular Services (Schedule of Fees) for processing several nonimmigrant visa applications, including F-1 student visas and J-1 exchange visitors.

International students and scholars are essential to U.S. higher education. U.S. colleges and universities are part of a worldwide network of learning, research, and education, and our institutions enroll millions of students from all over the world in undergraduate, graduate, and professional degree programs. Many of these students and scholars have gone on to invent groundbreaking technology, start thriving businesses, and create jobs. However, the number of international students and scholars has started to drop following a decade long historic growth, including a dramatic drop during the 2020-2021 academic year, in large part due to the COVID-19 pandemic.

International students and scholars are incredibly important to the overall economic recovery following the pandemic. In the 2020-2021 academic year, during the height of the pandemic, international students studying at U.S. institutions of higher education contributed \$28.4 billion and supported over 306,000 jobs across the U.S. economy.¹ However this was the second year in a row that those economic impact figures declined. According to NAFSA: Association of International Educators, the combined two-year decline totaled a \$12.1 billion loss for the U.S. economy.²

¹ <https://www.nafsa.org/policy-and-advocacy/policy-resources/nafsa-international-student-economic-value-tool-v2>

² <https://www.nafsa.org/about/about-nafsa/new-nafsa-data-show-largest-ever-drop-international-student-economic>

We have already started to see international student enrollments rebound in the 2021-2022 academic year. According to the most recent Open Doors snapshot survey, the total number of international students increased by 4 percent, which is up from the 15 percent decrease reported in Open Doors for Fall 2020. This indicates a marked improvement over the prior year when total international student enrollments fell by 17 percent.³

Under this proposed rule, State would increase fees for nonimmigrant visas (including F, M, and J) from \$160 to \$245 (an increase of 53 percent). In addition, State proposes to increase the J-1 Waiver fee from \$120 to \$510 (an increase of 325 percent). This fee is paid by students and scholars on J-1s to waive the two-year home-country physical requirement for J-1 visas if they wish to stay in the United States beyond the end date of their program, or if they wish to submit an application to the Department of Homeland Security U.S. Citizenship and Immigration Services (USCIS) for a change in visa status. This is a considerable fee increase for students and scholars to absorb all at once. We ask that State take these steep increases into account when considering additional future fee increases.

The proposed rule also notes that the fees are being raised to recover the costs of providing these specific consular services and that the fees were last adjusted in August 2014. While we appreciate that State is required to recover the costs of these services and that it has been some time since fees were last increased, we wish to express concern that this is being done at a precarious time when U.S. colleges and universities are working hard to return international student enrollments to pre-COVID levels. We urge State to couple any increase in fees with improvements in efficiency and processing times, which continue to be a concern for our institutions as well as our international students and scholars. An expectation of predictability and efficient visa processing is essential as we continue to seek to encourage international students to enroll and study at U.S. institutions of higher education. Visa applicants require increased transparency in visa processing to make critical decisions about their plans to study, research, and contribute to the United States.

While we understand the argument made by the State Department for raising these fees, we ask that this be done in a thoughtful manner and any additional resources be spent in improving efficiency and visa processing times for our international students and scholars. We look forward to continuing to work with the Department of State to support and strengthen pathways for our international students and scholars to study and work at our U.S. institutions of higher education.

Sincerely,



Ted Mitchell
President

³ 2021 snapshot survey: <https://www.iie.org/Research-and-Insights/Open-Doors/Fall-International-Enrollments-Snapshot-Reports>

On behalf of:

ACPA-College Student Educators International
American Association of Collegiate Registrars and Admissions Officers
American Association of Community Colleges
American Association of State Colleges and Universities
American Association of University Professors
American Council on Education
APPA, "Leadership in Educational Facilities"
Association of American Universities
Association of Governing Boards of Universities and Colleges
Association of Jesuit Colleges and Universities
Association of Public and Land-grant Universities
CCCU - Council for Christian Colleges & Universities
College and University Professional Association for Human Resources
Consortium of Universities of the Washington Metropolitan Area
Council of Graduate Schools
Hispanic Association of Colleges and Universities
ETS
NAFSA: Association of International Educators
NASPA - Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
National Association of Colleges and Employers
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
Presidents' Alliance on Higher Education and Immigration
UPCEA