

Re: Agency Information Collection Activities; Extension, Without Change, of a Currently Approved Collection: Training Plan for Science, Technology, Engineering, and Mathematics (STEM) Optional Practical Training (OPT) Students

OMB Control Number :1653-0054

Docket ID ICEB-2018-0003-0001

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to provide feedback on the proposed extension of the currently approved collection of the *Training Plan for STEM OPT Students*, as announced in the [Federal Register](#) on March 20, 2025, by the Department of Homeland Security (DHS) and U.S. Immigration and Customs Enforcement (ICE). FASEB, a coalition of 22 biological and biomedical scientific societies representing more than 110,000 scientists, recognizes the critical role international scholars—both graduate students and postdoctoral researchers—play in the U.S. research enterprise and strongly supports the proposed extension of STEM OPT as it would reduce unnecessary burdens on international scholars and enhance U.S. competitiveness by encouraging future scientists to pursue advanced education and research careers here. According to the [2023 National Science Foundation Survey of Earned Doctorates](#), 36.6 percent of science doctoral students held temporary visas. Similarly, the [2023 Survey of Graduate Students and Postdoctorates in Science and Engineering \(GSS\)](#) reported that 56.2 percent of all postdocs in science were on temporary visas.

The Optional Practical Training (OPT) program allows international students in STEM fields to work in the U.S. for up to three years after graduation. It has become increasingly popular, as highlighted in the [2024 Open Doors Report on International Educational Exchange](#), which noted that in [FY 2023](#), 276,452 students were authorized for post-completion OPT and an additional 122,101 students for STEM OPT. STEM OPT scholars directly contribute to the cutting-edge biomedical research that drives progress in public health, with most having degrees in technology, engineering, or business, and over half holding master's degrees.

FASEB also appreciates DHS's efforts to reduce administrative burden through improvements to Form I-983, which serves as a planning and evidentiary document for STEM OPT students, employers, and Student and Exchange Visitor Program (SEVP)-certified schools. Including electronic submission, improved formatting, and clearer collection of contact and compensation details will streamline compliance and reduce processing burdens while preserving program integrity.

Nearly [three-quarters](#) of foreign-born, noncitizen recipients of U.S. science and engineering doctorates remain in the country for employment. Further, analysis from National Association of

Foreign Student Advisers (NAFSA) shows that international students [contributed \\$43.8 billion to the U.S. economy and supported 378,175 jobs in the 2023–24 academic year](#). NAFSA's [national data](#) highlights the contributions of international students and their families to the U.S. economy, providing a detailed analysis across all states and congressional districts, demonstrating their impact throughout the entire country. The five states that saw the largest amount of economic activity were (in descending order): California, New York, Massachusetts, Texas, and Illinois.

Countries like China and India are actively competing to attract global talent through similar post-graduation work programs. With STEM job growth [projected](#) to outpace overall employment through 2026, maintaining a strong and diverse talent pool is vital. The OPT program, particularly its STEM extension, plays a vital role in attracting and retaining highly skilled international students who fuel U.S. economic prosperity, innovation, and global leadership in science and technology. FASEB is deeply concerned that ending or restricting the STEM OPT program would eliminate the only dedicated work pathway for many international graduates. This would likely drive talent elsewhere and diminish U.S. appeal to future students. Therefore, we strongly urge DHS to move forward with the proposed extension of STEM OPT, which is essential to maintaining a robust STEM workforce and strengthening the U.S. economy, national security, and labor market.

FASEB appreciates the opportunity to comment and looks forward to continued engagement with DHS on this important issue.

Sincerely,

A handwritten signature in black ink, reading "Beth A. Garvy". The signature is fluid and cursive, with the first name "Beth" and last name "Garvy" clearly legible.

Beth A. Garvy, PhD
FASEB President