



September 26, 2025

The Honorable Kristi Noem
Secretary of Homeland Security
U.S. Department of Homeland Security
Washington, DC 20528

RE: Notice of proposed rulemaking (NPRM) on 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 (DHS Docket No. [ICEB-2025-0001](#))

Dear Secretary Noem,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to provide comments on the notice of proposed rulemaking (NPRM) regarding changes to the F and J visa programs issued by the Department of Homeland Security (DHS). As a coalition of 22 biological and biomedical scientific societies representing over 110,000 individual scientists, FASEB recognizes international scholars as essential to sustaining U.S. leadership in science and innovation, which underpin public health, economic competitiveness, and national security. According to a [survey](#) of graduate students and postdoctoral appointees in science, engineering, and health conducted by the National Science Foundation in fall 2023, 40.7 percent of doctoral students and 57.9 percent of postdoctoral scholars are temporary visa holders, totaling >163,000 individuals across the nation.

The proposed rule change would impose additional burdens on international scholars, which threaten our nation's competitiveness by discouraging future scientists from pursuing educational programs in the U.S. and performing the cutting-edge research vital for biomedical progress. Specifically, the NPRM would replace “duration of status” admissions with a fixed four-year maximum, shorten the post-completion grace period from 60 to 30 days, and require all students and exchange visitors to file extensions of stay directly with U.S. Citizenship and Immigration Services (USCIS), including mandatory biometrics collection. By layering on uncertainty, expense, and delays, the proposed rule risks driving top global talent to competitor nations. This will weaken U.S. innovation and global leadership at precisely the moment when biomedical discoveries are most critical for public health and security.

The science, technology, engineering, and mathematics (STEM) workforce relies on a continuous pipeline of graduate students and postdoctoral scholars, with international researchers playing a critical role in sustaining the U.S. research and development enterprise. Data from the National Science Foundation (NSF) show that a large share of temporary visa holders who earn U.S. science and engineering doctorates remain in the country for subsequent employment, directly contributing to our economy and strengthening the U.S. innovation ecosystem. Roughly [three-quarters](#) report plans to stay in the U.S. for employment or postdoctoral research immediately after graduation; and about [70 percent](#) remain employed here a decade later. Looking ahead, the U.S. Bureau of Labor Statistics projects that STEM occupations will grow by [8.1 percent between 2024 and 2034, compared to just 3.1 percent growth](#) across all occupations. Meeting this demand depends on our ability to recruit and retain top global talent. If these scholars go elsewhere, the U.S. will fall behind in medical breakthroughs, technology development, and economic security.

Beyond workforce projections, it is critical to underscore the human impact of these proposed changes. International students often choose the U.S. because the flexibility of "duration of stay" allows them to complete their training without the constant threat of disruption. If talented young scientists no longer view the U.S. as a viable or welcoming option, they will take their skills elsewhere, and our nation will forfeit both their research contributions and the long-term economic benefits of retaining them in our workforce. At the same time, U.S. colleges and universities are bracing for an enrollment cliff, with the total number of high school graduates [projected to decline after 2025](#). This demographic shift will reduce the pool of domestic students available to enter higher education. International students are therefore not only vital for maintaining research capacity in STEM but also for sustaining institutional enrollment and the national workforce pipeline. Weakening U.S. competitiveness in attracting these students would have severe consequences for higher education and for the economy.

Current international students and researchers on F and J visas are legally admitted to the U.S. for "duration of status" (D/S), typically the length of their academic or research program. DHS argues that D/S makes monitoring compliance more difficult, and the proposed changes are intended to address national security concerns. However, while specific examples of abuse are provided in the NPRM, it is unclear how frequent violations occur and whether they are significant enough to justify replacing D/S with a fixed admission period.

With the 2025 proposal, admission would be capped at four years or the program end date, whichever comes first. This does not align with the timeline for doctoral training: the average time to a PhD is approximately [5.7 years](#), meaning nearly all international PhD students would need at least one extension from USCIS, with no guarantee of approval. Combined with a shortened 30-day grace period and mandatory biometrics, these added burdens create uncertainty that will discourage enrollment. Even DHS acknowledges in its regulatory review that such changes could decrease international student enrollment — a shift that would reduce tuition revenue and constrain the flow of highly trained talent into the U.S. research system.

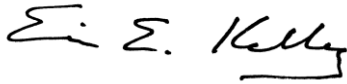
Under current regulations, Designated School Officials (DSOs) and Alternate or Responsible Officers (AROs/ROs) already monitor international students and exchange visitors through the Student and Exchange Visitor Information System (SEVIS), the federal database used to track and verify their status, which [DHS](#) describes as "a critical tool" for compliance. The proposed rule would shift responsibility by requiring F and J visa holders to apply directly to USCIS for an extension of stay if their program exceeds the fixed admission period. This duplicative process adds little compliance value but significantly increases costs and risks. USCIS already faces lengthy processing [backlogs](#), and funneling tens of thousands of extension requests into the system will only worsen delays. If applicants cannot secure approval before expiration of their authorized stay, they could be forced to depart the country and seek reentry, further disrupting academic and research continuity. Shortening the grace period from 60 days to 30 days further compounds this risk, leaving scholars with less time to navigate delays and increasing the likelihood of inadvertent visa lapses.

Most of the costs associated with the proposed rule would fall on applicants in the form of additional paperwork and filing fees. As [FASEB](#) and the [National Academies of Sciences, Engineering, and Medicine](#) have previously documented, such burdens—combined with the stress of uncertain USCIS adjudications—create financial hardship, reduce research productivity, and erode trainee wellbeing. Collectively, these systemic effects will ultimately weaken the nation's research enterprise.

The NPRM would also impose more strict oversight on F nonimmigrant students who wish to transfer or change programs, discouraging academic flexibility and interdisciplinary study essential to U.S. scientific leadership. Restricting mobility between programs or institutions risks stifling innovation at a time when transdisciplinary training is increasingly vital.

FASEB is deeply concerned that the NPRM will impose unnecessary administrative and financial barriers, making the U.S. less attractive to global talent and weakening the STEM workforce at a time when demand for highly trained researchers continues to grow. For these reasons, FASEB urges DHS to withdraw the proposed changes and preserve duration of status as a proven policy that supports compliance, innovation, and competitiveness.

Sincerely,

A handwritten signature in black ink, reading "Eric E. Kelley". The signature is written in a cursive style with a prominent horizontal line at the end of the last name.

Eric E. Kelley, PhD
FASEB President