

Dear California Representative,

On behalf of the Associated Students Incorporated (ASI) of California State University, East Bay, we write to express our strong opposition to the Department of Homeland Security's proposed rule published at 90 FR 42070 (DHS Docket No. ICEB-2025-0001), which would eliminate "Duration of Status" (D/S) for F-1 and J-1 students and impose a fixed period of admission with a burdensome extension of stay process. We request that the proposed rule is ultimately removed from consideration.

This proposal is inequitable, administratively wasteful, and fundamentally obstructive to our mission as a public university in California. It erects barriers for students who come here in good faith to learn, contribute, and invest in their futures. In practice, it functions as a new financial and bureaucratic burden on individuals who are already paying significant tuition and living expenses to pursue an education in the United States.

California State University, East Bay is proud to serve students from across the globe. International students are not peripheral to our campus community. They are researchers in our labs, leaders in our classrooms, contributors to our local economy, and ambassadors of global understanding in the East Bay. A federal rule that injects uncertainty into their ability to complete their degrees strikes at the heart of our institutional values and California's longstanding commitment to educational access and global engagement.

The proposed rule would eliminate the longstanding D/S framework and replace it with a fixed admission period of up to four years, after which students would be required to apply to Immigration Services for an extension of stay, even if they are making normal academic progress. This is not a targeted enforcement mechanism. It is a blanket requirement imposed on more than 1.8 million international students and exchange visitors nationwide. It would also shift authority over academic timelines away from universities and into the hands of an already overburdened immigration system.

As of September 2025, USCIS reported Form I-539 extension of stay processing times of approximately 6.5 months. Requiring hundreds of thousands of additional extension applications would exacerbate existing backlogs and cause unnecessary uncertainty surrounding students' legal status through no fault of their own.

The economic consequences are profound. International students contributed \$43.8 billion to the U.S. economy and supported 378,175 jobs during the 2023–2024 academic year. For every three international students, one U.S. job is created or supported (NAFSA Economic Value Tool: <https://www.nafsa.org/policy-and-advocacy/policy-resources/nafsa-international-student-economic-value-tool-v2>). Independent analysis submitted in response to this rule estimates potential annual losses of \$72 to \$145 billion within a decade if D/S is eliminated (Clemens, Neufeld, & Nice: <https://ifp.org/wp-content/uploads/Clemens-Neufeld-Nice-D-S-Elimination-comment.pdf>).

In addition, this proposal fails to account for the realities of a student's academic journey. Many students do not complete their degrees within a rigid, predetermined timeline due to factors

beyond their control. It is common for students to extend their studies by a semester or more after changing majors, receiving inaccurate or evolving academic advising, or facing delays in the evaluation and transfer of credits, especially for international students navigating different education systems. These are not exceptions, but normal and often necessary adjustments that allow students to make informed decisions about their education and career paths. Imposing a fixed period of stay without flexibility for these circumstances would unfairly penalize students for routine academic transitions and institutional processes, further compounding stress, financial burden, and uncertainty.

For a region like the East Bay, where CSU East Bay students live, rent apartments, shop locally, and support small businesses, these impacts are not abstract. They ripple through our communities.

The proposal also rests on speculative claims about fraud and national security risks without demonstrating systemic failure in the existing oversight structure. International students are already among the most monitored nonimmigrant populations through SEVIS reporting requirements. Creating duplicative extension procedures does not meaningfully enhance security; it multiplies paperwork.

Moreover, this rule sends a damaging message. It reframes international students not as contributors to American education and innovation, but as presumptive risks to be subjected to repetitive adjudication. California's public universities have long been engines of mobility and global exchange. A policy that adds cost, delay, and uncertainty to degree completion functions as a deterrent.

We are deeply concerned that this proposal effectively taxes international students through repeated filing fees and legal expenses simply to remain in lawful status while completing programs our institutions have already certified. It is difficult to view this as anything other than an unnecessary financial barrier placed on individuals who already contribute significantly to tuition revenue and the broader U.S. economy.

The Associated Students Incorporated of CSU East Bay urges you to:

1. Publicly oppose the proposed rule at 90 FR 42070.
2. Advocate for its withdrawal.
3. Demand that DHS meaningfully engage with higher education stakeholders before implementing sweeping changes that affect millions of students.
4. Support policies that strengthen, rather than undermine, the United States' position as a global leader in higher education.

California has always stood at the intersection of innovation and diversity. Our university reflects that spirit. We cannot allow federal policy to close doors that generations of students have crossed in pursuit of knowledge.

We respectfully request your leadership in protecting equitable access to education and preserving the integrity of our international student community at California State University, East Bay and across our state.

Sincerely,

London Rain Deguzman (ASI President)

Yashica Avhad (Director of Communities & Vice President of External Affairs)

Associated Students Incorporated  
California State University, East Bay