



USM Student Council Report for the USM Board of Regents

November 13, 2020

The USM Student Council (USMSC) has continued to have impressive levels of engagement and growth. We now have our co-directors to lead in areas of government relations; diversity, equity and inclusion; student affairs; and communications. To support the directors, each area is also forming a supporting committee to help with coordination and implementation of efforts. In addition, the USM Student Council formed committees to focus on mental health and wellbeing of students as well as a student fees committee to examine processes and best practices.

The focus of the USM Student Council since the last Board of Regents meeting has been to strengthen our organization internally as well as through continued engagement of students with the Chancellor and USM Votes efforts. We had yet another very productive session with Chancellor Perman with students from across the system as well as several meetings with Associate Vice Chancellor Nancy Shapiro to amplify the coordinated civic engagement and civic education work. In addition, we have worked with Council of University System Faculty and the Council for University System Staff (CUSF and CUSS) whose presidents attended our meeting last month to better harmonize discussions and efforts around issues impacting our communities jointly. One example that shows the power of these continued efforts was the use of USMSC to inform CUSF of election day efforts that then made it on to the CUSF agenda within 24 hours as a resolution that was subsequently passed. Additionally, the coordinated conversations to plan the joint council meeting for later this month have helped build relations and are helping us to respond together to COVID-19 issues across students, faculty and staff. In addition, we welcomed MaryPIRG to our meeting last month and many institutions are interested in continued collaboration in areas of sustainability and civic engagement.

We had unanimously favorable support for our statement of opposition to the proposed Department of Homeland Security D/S rule which USMSC views as having detrimental impacts for our entire system if passed. This statement passing unanimously and being a priority discussion further demonstrates a concern for our over 5,000 international student on F and J visas in the USM and our support for their wellbeing and security as students. This statement was submitted through the Federal Register during the open period for public comment and shared with the Chancellor and Maryland Attorney General's Office.

Our next steps in this continued effort include bridges between USMSC and the Maryland Higher Education Commission (MHEC) Student Advisory Council. These meetings have begun and will continue at our USMSC meeting this Sunday where the chair of the MHEC Student Advisory Council plans to join our meeting to discuss the forthcoming, updated, five-year State Plan for Postsecondary Education and areas including, but not limited to, adaptations to online learning environments and technology access, transfer student support and mental health and wellbeing.



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Of note, the USMSC as a whole continues to express appreciation for the tremendous work being done day in and day out by leaders at the institutional and system level as well as by faculty, staff and fellow students during this time. The election was an exciting and draining time for many students, but most feel a renewed sense of hope for our shared future. Many students express, sadly, a lack of flexibility and compassion from some faculty and administrators during COVID-19 and hope these cases may continue to be addressed expeditiously. Examples would be less rigid expectations that are dependent upon one's access to technology to engage with virtual learning; considerations for many students, who, like faculty and staff, may now be absorbing care-giving responsibilities for loved ones; the overall anxiety produced by current events (pandemic, structural racism, natural disasters); and the need for communications, resources and flexibility related to grief and bereavement needs and the ability to feel supported for those seeking Americans with Disabilities Act (ADA) accommodations or who are newly diagnosed with learning disabilities.

Many student governments have identified their top efforts to be related to addressing structural racism and additional initiatives to improve diversity, equity and inclusion (DEI) across various populations including disability. Student government leaders are interested in better understanding the bigger DEI picture across the system and we are working to help provide reports to all of the student leaders. The discussions surrounding COVID-19 and DEI had significant overlap with concerns for mental health. We discussed how students may learn about resources and best spread the word about them to their constituents, an acknowledgement that tele-counseling is a wanted option, but not one feasible for everyone given a wide variety of possible limitations caused by lack of private space and not being available during the times when most services are offered and/or stable internet connectivity.

One of our largest projects of the term is to help with the student regents selection process, and we have already begun our outreach efforts and look forward to a full slate of qualified nominees.

With Respect and Appreciation,

A handwritten signature in black ink, appearing to read "Annie Rappeport". The signature is written in a cursive style.

Annie Rappeport
2020-2021 USMSC President



Statement of Opposition to the Department of Homeland Security and Immigration and Customs Enforcement’s Proposed Rule 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

Public Comment from the University System of Maryland Student Council
October 25, 2020

The University System of Maryland Student Council (USMSC) represents over 172,000 students across 12 higher education institutions and three regional centers. The USMSC represents thousands of international students who are currently on F and J one visas and who are valued members of our student community. We cannot imagine our universities without our international undergraduate and graduate students. Our care for our community members compels us to submit public comment with the following oppositional statement and specific concerns of how the new restrictions would negatively impact us.

The proposed rule “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” will result in devastating consequences for international students who are part of F and J non-immigrant visa programs by introducing restrictions that misalign with the realities of completing higher education programs in the United States. The assumption by DHS that “many F, J, and I nonimmigrants would be able to complete their activities within their period of admission” is alarmingly erroneous. If approved, the proposal’s added rigidity to the D/S, which determines multiple aspects of F and J visa duration, would be a deterrent for future potential international graduate student enrollments—resulting in unprecedented loss as these enrollments enrich higher education institutions in a multitude of ways not the least of which are through tuition and fee revenue, research productivity and teaching capacity.

The [proposed modifications and specific language](#) from the DHS ruling listed in B. Summary of the Proposed Regulatory Revisions that will negatively impact current and prospective international students include the following:

- “Setting the authorized admission and extension periods for F and J non-immigrants (with limited exceptions) up to the program length, **not to exceed a 2- or 4-year period.**”
The **limited 2-year admission** is recommended for students that are 1) from countries of State-Sponsored Terrorism, 2) countries with greater than 10% overstay rate, 3) enrolled in specific courses of national interest, 4) enrolled in unaccredited schools, and 5) schools that do not participate in E-Verify;
- “**Decreasing from 60 to 30 days** the allowed period (commonly known as the grace period) for F alien to prepare to depart from the United States after completion of a course of study or authorized period of post-completion practical training;”
- “Limiting language training students to **an aggregate 24-month** period of stay, including breaks and an annual vacation.”



Statement of Opposition to Docket ID No. ICEB-2019-0006

We have also identified the following as some of the negative resulting consequences that will impact our students and universities should the proposed rule be approved:

1. The United States will see a decline in international students who increase the US talent pool, improve international relations and provide substantial amounts of revenue through paying tuition, fees and costs of living expenditures while completing their degree programs.
 - a. It would specifically discourage international students from pursuing a Ph.D. in the U.S. as the proposed fixed admission time frame (4 years) is much lesser than the median Ph.D. completion time of [5.8 years](#).
2. The rule is a deterrent to international students and families who would otherwise invest thousands of dollars into the US economy and help the much-needed economic recovery of the country in light of the pandemic-caused recession.
 - a. [International students contributed \\$41 billion to the economy in 2018-2019 and supported 458,290 jobs according to the National Association of Foreign Student Advisors](#).

In addition, the proposed rule is flawed with reasoning that is vague and misplaced:

1. DHS provided no clear explanation of why changing to a fixed-term admission would reduce the overstay rate while the fixed-term "[business visitors](#)" visa category overstay rate seems to be consistent from 2016 to 2019.
 - a. Overstay rates in 'student and exchange visitor' visa categories have significantly fallen from [2016 to 2019](#);
 - b. It is important to note that the total number of overstays identified in the report does not equal the total number of overstays who currently remain in the United States during this reporting period. The [number is lower because foreign nationals identified as possible overstays can subsequently depart the United States, or apply to change or extend their current lawful status](#). For purposes of this report, these are still considered overstays demonstrating that the overstay data is [misguidedly interpreted](#);
 - c. The proposed rule imposes a 2-year admission restriction on students from those countries with greater than 10% overstay rates. The restriction is biased because [some countries send only a handful of students](#) and even one isolated transgressor might trigger the overstay restrictions.
2. No actual statistical evidence was provided by DHS on the threat to national security. Only a very few isolated incidents were cited. This is highly problematic and not an appropriate nor pragmatic way to change rules.



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- a. [Biometrics](#) of international students are already collected at the port of entry by Customs and Border Protection (CBP), so that data is already available to DHS;
- b. Immigration and Customs Enforcement (ICE), a branch of DHS, already monitors the international students in the U.S. through the Student and Exchange Visitor Information System ([SEVIS](#)) program.

Our expressed comments and information cited in the statement above should make clear why the USMSC opposes the Department of Homeland Security's proposed ruling for elimination of Duration of Status (D/S) re: Docket ID No. ICEB-2019-0006. Currently, this rule is in the proposal stage and will accept public written comments, on the [Federal eRulemaking Portal](#), until October 26th. Thank you for allowing public comments to the proposed rule and for consideration of our statement of opposition.

Sincerely,

The USMSC Student Council, representing student leadership from:

Bowie State University

Coppin State University

Frostburg State University

Salisbury University

Towson University

University of Baltimore

University of Maryland, Baltimore

University of Maryland, Baltimore County

University of Maryland, College Park

University of Maryland Center for Environmental Science

University of Maryland Eastern Shore

University of Maryland Global Campus

Universities at Shady Grove