



Office of the President

1700 Van Hise Hall
1220 Linden Drive
Madison, Wisconsin 53706-1559
608-262-2321

rcross@uwsa.edu
www.wisconsin.edu

September 9, 2019

Honorable Members of the Wisconsin Congressional Delegation:

As the president and chancellors of the University of Wisconsin (UW) System, we are writing to express the importance of our international students, faculty and scholars, and their valuable contributions to our robust academic campus cultures. We are concerned by the obstacles (outlined in the following attachment) that impede our ability to attract and retain this important source of talent. International students and scholars not only contribute to the teaching and research that prepare our students for careers in an increasingly diverse country and globally competitive workforce, they help drive innovation that propels Wisconsin's economic development.

Our UW System institutions depend on attracting motivated students and scholars from around the world. The 13,000 international students enrolled in Wisconsin's public and private colleges and universities contribute \$400 million to the state economy.¹ International students and scholars bring much more than just economic value— they provide knowledge and cultural expertise that enriches our students' academic experience, drives innovation, and builds connections for future trade, investment, and innovation.

The UW System has unfortunately seen significant decreases in international student enrollment at most of our universities. Visa processing delays and uncertainties for both students and H-1B scholars are contributing to the loss of some of our best applicants, who choose to go to other countries. Excluding UW-Madison, UW System data indicates that international student enrollments dropped by 5.7 percent in 2017 and an additional 5.6 percent in 2018. A 2018 survey by the Institute of International Education found that new foreign student enrollment for undergraduate programs in the U.S. has decreased by 8.9 percent since the 2015-16 school year.² The Council of Graduate Schools has also reported a decline in applications from international graduate students for the past two years.³ An analysis of U.S. Citizenship and Immigration Services data found that the time it takes the federal government to process foreign visas has increased by 46 percent over the past two fiscal years.⁴ Taken together, these studies indicate that the UW System's experience is part of a concerning national pattern of visa uncertainties and declining international student enrollment.

¹ [International Student Economic Value 2017-2018](#). NAFSA. 2018

² [IIE Research and Insights](#). IIE Open Doors, 2018

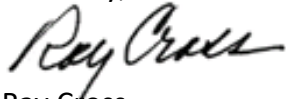
³ International Graduate Applications and Enrollment: Fall 2018. Council of Graduate Schools, February 2019.

⁴ [USCIS Processing Delays](#). AILA Policy Brief (January 30, 2019).

While we recognize the need for appropriate immigration processes to ensure our nation's security, the current administrative processing delays and increasing obstacles create a level of uncertainty for international students and scholars that discourages applicants at a time when there is increasing global competition for talent.

As the 116th Congress moves forward, we ask that you take action and closely monitor the administrative actions and policies that are impeding the free flow of students and scholars upon which our campuses depend. We appreciate your work on these issues and hope that you will continue to facilitate the valuable participation of our international students and scholars in our University of Wisconsin campus communities.

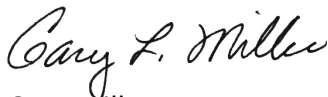
Sincerely,



Ray Cross
President, UW System



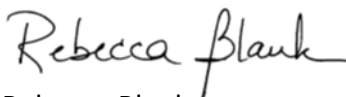
James Schmidt
Chancellor, UW-Eau Claire



Gary Miller
Chancellor, UW-Green Bay



Joe Gow
Chancellor, UW-La Crosse



Rebecca Blank
Chancellor, UW-Madison



Mark Mone
Chancellor, UW-Milwaukee



Andrew Leavitt
Chancellor, UW-Oshkosh



Deborah Ford
Chancellor, UW-Parkside



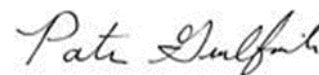
Dennis Shields
Chancellor, UW-Platteville



Dean Van Galen
Chancellor, UW-River Falls



Bernie Patterson
Chancellor, UW-Stevens Point



Patrick Guilfoile
Interim Chancellor, UW-Stout



Renee Wachter
Chancellor, UW-Superior



Dwight Watson
Chancellor, UW-Whitewater



We respectfully request that Congress act on the following policies and closely monitor visa policies to minimize delays to allow the UW System to compete successfully in the global marketplace for talent.

- **Administrative processing delays for entry visas:** Administrative processing is the time period outside of “normal” processing times where cases that appear to meet the basic eligibility requirements are referred for additional background checks by multiple agencies. The time this takes is unpredictable and in a number of recent cases, students, researchers and faculty members have been forced to miss or defer entire semesters due to visa applications stuck in “administrative processing.” There has been a recent increase in the amount of time cases remain in this category, and applicants are usually not provided with adequate explanations, nor are they told how long the additional processing may last.
- **Increased Requests for Evidence:** Universities seeking to hire foreign-born employees have seen a dramatic increase in the number of “Requests for Evidence” (RFEs) from United States Citizenship and Immigration Services (USCIS), particularly for H-1B visas, which allow U.S. employers to hire highly-skilled foreign workers in specialty occupations. We understand USCIS has a responsibility to ensure it has necessary eligibility information and we do not doubt that some of these requests are warranted. However, the increase has been extreme, with RFEs for H-1B visa petitions more than doubling between the third and fourth quarters of FY 2017, with no change in the legal basis of the program. These requests delay the issuance of visas for our campuses by many months and boost legal costs. With no indication of how long the delay may last, universities cannot plan staffing for teaching and research, and top applicants may choose other options that offer more certainty.
- **Processing Delays for Optional Practical Training:** Optional Practical Training (OPT) permits foreign students studying in the U.S. to apply for “practical training” with a U.S. employer in a job directly related to their course of study. The program allows students to supplement their education with valuable experiential learning and on-the-job-training as they start their careers. Students are not permitted to apply for OPT until 90 days in advance of their start date, but processing times for OPT applications have increased from a previous maximum of 90 days in 2016 to 3½ - 5½ months today. Processing times in this range create an enormous burden for students who must delay their start date, and in many instances lose out on the position altogether. This harms not only the students, but also the employers seeking to hire qualified, U.S.-trained workers for a practical training opportunity.
- **Duration of Status:** The administration has indicated that it intends to propose a new rule this fall to limit the “duration of status” (DOS) for international students. Historically, students have been admitted for as long as they follow regulations and are pursuing their studies and research full time. The proposed regulations would have a fixed time period, with a possibility for renewal in each visa category. Time to degree is dictated by academic programs and can vary considerably for individual students depending on variables such as majors, course loads and research choices. The need to apply for extensions would add even more processing issues and uncertainties for students who are already contending with a backlogged visa system. As we compete globally for talent, this additional burden could make our system even more unwelcoming without discernable benefits.