



**COUNCIL OF GRADUATE  
STUDENTS**

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*MSU is an affirmative action  
equal opportunity institution*

October 14, 2020

*The following statement was unanimously approved by the COGS Full Council in response to 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” (Federal Register Number 2020-20845). It will be submitted as a public comment and distributed to the MSU congressional delegation.*

The Council of Graduate Students at Michigan State University affirms that international students are an integral part of our graduate and professional student community. We strongly oppose the implementation of a fixed period of admission for F or J nonimmigrant students. Under the proposed policy, students attending US universities would be restricted to periods of 2 to 4 years of study, with extensions only for extenuating circumstances. The average graduate or professional program takes longer to complete than these proposed time periods. For example, the 2017 Survey of Earned Doctorates found that the median time to degree completion for PhD students was 5.8 years. The proposed fixed periods of admission would therefore preclude nonimmigrant students from enrolling in graduate and professional programs in the United States. By excluding these emerging scholars, this policy will seriously obstruct current and future US research programs. This program is not only damaging to the international students who seek to study in the U.S., but also the domestic graduate students who benefit from learning alongside their international colleagues and our nation which is enriched by their abilities.

*COGS encourages MSU graduate and professional students to submit their own public comment at <https://beta.regulations.gov/document/ICEB-2019-0006-0001> by the October 25, 2020 deadline.*

*In solidarity,*

*Meagan N. Abel  
President  
Council of Graduate Students*