



OFFICE OF THE PROVOST AND
EXECUTIVE VICE PRESIDENT FOR ACADEMIC AFFAIRS

OFFICE OF THE PRESIDENT
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Oakland, California 94607-5200

August 28, 2018

Sharon Snyder
Unit Chief, Student and Exchange Visitor Program
U.S. Immigration and Customs Enforcement
Department of Homeland Security
500 12th Street, SW
Washington, D.C. 20536

Docket No. ICEB-2017-0003

Dear Ms. Snyder,

On behalf of the University of California (UC), I write to comment on the Department of Homeland Security's notice of proposed rulemaking dated July 17, 2018, which pertains to fee adjustments for the Student and Exchange Visitor Program (SEVP). Thank you for the opportunity to share UC's perspective with the department as fee adjustments are considered.

UC appreciates that SEVP fees have not been adjusted since 2008 and recognizes that the program requires some modifications. While the university understands the need to adjust fees, any additional fee revenue should be allocated to reduce prolonged I-17 adjudication times and improve the accuracy of student and scholar Student and Exchange Visitor Information System (SEVIS) records. We respectfully request that fees be used to increase staffing, which would allow for additional school liaisons and a more transparent timeline for the adjudication of cases.

The proposed fee increases will have adverse effects on UC's ability to attract and retain talented international students and scholars, as well as sustain UC's ongoing financial support for these individuals. For international students engaged in short-term, non-degree research programs, reciprocal exchange programs, English language learning programs or other short-term programs, the new fees will add an additional financial barrier to studying in the U.S. and may signal an unwelcoming atmosphere in the U.S. Furthermore, students who return to study at UC on a recurring basis—such as students involved in summer research—would be subject to these increased fees on an annual basis, disincentivizing such participation by international students and scholars. This is a loss for domestic students as it reduces their ability to interact with scholars from across the globe.

Additionally, for international graduate students and scholars at UC who have tuition/fee remissions, some of the additional costs would be assumed by the university, thereby diminishing UC's ability to sustain current cohorts of international graduate students and scholars. This would narrow the pool of highly talented students and scholars UC is able to attract, shrink the overall international graduate population at the university's campuses and

negatively impact the university benefiting from the talents and expertise these students and scholars bring to our university.

Thank you again for the opportunity to comment on these proposed fee adjustments. If you have any questions or concerns about this comment letter, please contact Crystal Martinez, director for education in UC's Office of Federal Governmental Relations, at Crystal.Martinez@ucdc.edu or 202-974-6308.

Sincerely,

A handwritten signature in blue ink that reads "Michael T. Brown". The signature is written in a cursive style with a large initial "M".

Michael T. Brown, Ph.D.
Provost and
Executive Vice President for Academic Affairs

cc: Associate Vice President Chris Harrington