



October 14, 2020

Sharon Hageman  
Acting Regulatory Unit Chief, Office of Policy and Planning  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
500 12th Street SW  
Washington, D.C. 20536

Re: DHS Docket No. ICEB-2019-0006-0001, UWC-USA Comments in Response to Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure

As the president of United World College-USA, and on behalf of our school community, which is an international boarding school located in New Mexico, I submit this comment letter in response to the U.S. Department of Homeland Security's proposed rule, Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure (DHS Docket No. ICEB-2019-0006-0001), published September 25, 2020.

**We strongly recommend that the proposed rule be completely withdrawn and that admission for the duration of status remain in effect.**

Each year, UWC-USA enrolls over 200 students with approximately 160 coming from more than 90 countries on F-1 visas. We place a very high percentage of these remarkable students at highly selective colleges and universities around the United States every year. These students are not alone. They are joined by students from our 17 other campuses around the world who are dedicated to using education as a force for peace and sustainability. This year there are 3,100 students studying in the United States as part of the Davis United World College program. To be clear: these students enrich our educational institutions and are enriched by the fine tradition of a U.S. higher education. Each time the federal government creates more challenges to studying in the United States, our UWC-USA campus is thwarted in our admissions efforts and our global educational movement is thwarted in its ability to execute on our mission.

**We strongly submit that the proposed rule will limit our ability to recruit and enroll academically strong and talented students from other countries, resulting in a detrimental effect on both our school and the larger community we serve as part of our mission.**

Our students enrich our community in Northern New Mexico in a variety of ways. While we are a boarding school, many of our students spend weekends with local families in our Get-Away Family Program. These families and our students benefit from powerful opportunities for cultural exchange. They build connections that last their entire lives. Our students typically conduct over 17,000 hours of community service in San Miguel County each year, enriching the lives of community members in homeless shelters, soup kitchens, and after-school programs.

**We are further opposed to the rule because the safeguards it purports to create are already in place with SEVIS.**

SEVIS currently collects the information DHS requires to make determinations about students who are in compliance with regulations. The proposed rule does little to enhance those security measures. DHS would be better served by using their resources to focus on risk factors – using data to inform their decisions – rather than a blanket enforcement effort that will make studying in the United States more challenging to individuals contributing to our institutions of higher learning, including the world class research to which they contribute.

**We are further opposed to the proposed rule because it does not reflect the reality of student enrollment in United States schools. This is true for UWC-USA in particular and for other high schools that prioritize international exchange as well.**

As a two-year high school for 11<sup>th</sup>- and 12<sup>th</sup>-grade students, under the proposed rule our students who graduate from UWC-USA and enroll in a U.S. university would need to reapply for their visas after two years of their undergraduate studies. We feel that the uncertainty associated with this ill-advised timing could discourage students from enrolling in our school or enrolling in a U.S. university or both.

In closing, I strongly recommend that the DHS abandon this proposed rule. It creates unnecessary impediments to students studying at U.S. schools.

Victoria J. Mora, Ph.D.  
UWC-USA President