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UCIEP, the University and College Intensive English Program Consortium, a membership organization of 78 intensive English programs coming under the governance of universities and colleges in the United States, strongly opposes 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.*

According to the 2019 IIE Open Doors report, the 78 UCIEP parent institutions (out of approximately 3,000 reporting colleges and universities) enrolled 27% of all international students present on F-1 visas in the academic year 2018-2019. In fact, 11 of the 25 top schools for international student enrollment host intensive English programs that belong to UCIEP. Our membership believes that the proposed rule in question will perpetuate an already devastating enrollment decline that has directly impacted our member programs. As stated in the proposed rule, “DHS appreciates the importance of nonimmigrant student enrollment and exchange visitor participation to the U.S. culture and economy, but acknowledges the potential for the proposed rule to affect future nonimmigrant student enrollment and exchange visitor participation and associated revenue” (p. 170). As such, we find it important to share recent data that demonstrate the catastrophic impact the Coronavirus pandemic has had on the intensive English program industry in order to illustrate the need for the U.S. government to avoid creating additional bureaucratic and financial hurdles for international students and instead support a rebound in international student enrollment.

UCIEP surveyed its membership in September 2020 to gauge the impact of travel restrictions and social distancing requirements that the current pandemic has had on our programs. With a 94% response rate, the following findings are a reliable measure to communicate the reality of an industry in deep distress:

- 76% decline in aggregate UCIEP program enrollment from Fall 2019 to Fall 2020
- 48% of programs are currently operating fully online
- 56% of UCIEP program-enrolled students are currently living outside the US
- 48% of programs enrolled NO new students from abroad in the Fall 2020 term despite that fact that over 1000 I-20s were issued for fall
- 58% of programs have laid off or furloughed faculty and/or staff since March of 2020

These are indeed trying times for intensive English programs. In order for our programs to persist through this difficult time and to rebound to the higher enrollments of previous years, we need support in recruiting and retaining international students and in creating a welcoming environment to the US, or we will indeed lose more of our international student market to other English-speaking countries, as DHS predicts.

With the loss of these students from our English programs, and even the impending loss of our English programs (two UCIEP programs have closed in the past year), we—as a nation—will lose a great deal more in terms of the financial and economic losses already visible throughout our local communities coupled with continued damage to the country’s efforts in international diplomacy. Several of our member programs support important Department of State programs such as the Fulbright Foreign Student Program, the Hubert H. Humphrey Fellowship Program, the Junior Faculty Development Program, and the Study of the U.S. Institutes by serving as training sites for students and professionals accepted into these prestigious programs. Many of our member programs are associated with academic departments of the parent university, typically foreign language departments or applied linguistics departments, that attract hundreds, if not thousands, of international students each year who seek a master’s degree in Teaching English as a Second Language. The IEPs associated with these departments often serve as a training ground for these

international students planning to teach English abroad. Additionally, domestic students graduating from these programs frequently become English Language Fellows through the Department of State, or enter our public-school systems in order to support the large population of non-English-speaking primary and secondary school students in this country. Without the support of the intensive English programs, these degree-granting academic programs may also experience devastating loss of enrollments, or complete programmatic collapse. This collapse would result in a great loss in professionals exporting the language training skills to students abroad in addition to the people-to-people connections these professionals provide through educating foreign students on US culture and supporting the development of worldwide democracy.

Over the years, a great deal of trust has been built between UCIEP programs and the Department of Homeland Security. Not only did the UCIEP community strongly support federal regulations for programmatic accreditation in the early 2000s, several UCIEP program leaders were directly involved in the genesis of programmatic accreditation for intensive English programs in the late 1990s, which ultimately led to the founding of the Commission on English Language Program Accreditation, or CEA, an accrediting body recognized by the U.S. Secretary of Education. Additionally, many UCIEP program leaders were directly involved in advocating for the 2010 *Accreditation of English Language Training Programs Act* in order to ensure our programs would be protected from the damaging impact of programs operating for the purpose of committing visa fraud. Not only are all UCIEP programs approved by our parent institution's regional accrediting body, as required by law, but 64% of our members are also voluntarily accredited by CEA. Taken together, our support of these initiatives provides overwhelming evidence that our member institutions are committed to the highest standards in language learning and academic rigor, and to national security. DHS's proposal of a lifetime limit on the English language study of any nonimmigrant student to 24 months is an egregious breach of the mutual trust we have spent decades building.

The proposed rule unnecessarily encroaches upon academic affairs that belong in the domain of the language program and/or institution. As experts in second language acquisition and as experienced program administrators, UCIEP directors and our staff know our students best. We take seriously our commitment to support the policies of the U.S. government and ensure that students understand the rules; we foster close relationships with our students to ensure that they get appropriate and timely advising and make informed choices. In turn, we expect DHS to strengthen an already existing system - a combination of the SEVIS system and the deployment of SEVP field representatives who make biannual site visits to schools in their territories - to monitor and report on the progress of enrolled students. Instead of implementing redundant and punitive rules that will impede student success, we urge DHS to continue to enhance the operations of its existing SEVIS system in partnership with school officials and foster a welcoming environment for these students—one they will continue to flock to as the gold standard in language learning across the globe.

Thousands of U.S. jobs depend on international students entering the U.S., successfully completing their educational goals, and successfully completing practical training. English language programs are often the gateway for these students to enter our educational institutions and our culture. We provide not only English language training, but cultural and emotional support. To hinder the recruitment of students into English language programs is to damage the foundation of the entire export market of US education internationally.

Sincerely,
Julie Strecker, Ph.D.
UCIEP President, 2020-2021