October 22, 2020

Dear Acting Regulatory Unit Chief Hageman,


AJCU represents fifteen doctoral universities, ten master’s colleges and universities, and two baccalaureate colleges in eighteen states and the District of Columbia, as well as a junior college in Belize. For nearly 500 years, Jesuit institutions (located all across the world) have made providing access to higher education for all, and caring for each person within their campus communities, central to their mission. This commitment to seeking the common good guides their work each day. Our colleges and universities are also part of the International Association of Jesuit Universities (IAJU), which supports “institutions that promote peace and reconciliation, justice and faith through research and the formation of students, in order to transform society and culture.” Together, we recognize the power and purpose of a global academic community.

Our member institutions agree with the comments recently submitted by the American Council on Education (ACE) on behalf of the many associations representing higher education, the health professions community and others. As an association, AJCU would like to reiterate our concern with the negative consequences this policy will have on the students we serve, and the ways that it will limit international students’ participation in a community of learners.

17,000 international students are currently enrolled in language, undergraduate, graduate and professional programs at our Jesuit
institutions of higher education. These students contribute in significant ways to the vibrancy and diversity of our learning communities. As one of our institutions noted, the proposed regulations fail to adequately explain how the current system is not working and the proposed rule is filled with language expressing concern without justification or proof.

This fundamental disconnect is evident in several proposed provisions. For example: institutions that do not use the voluntary E-Verify system would see their international students (undergraduate, graduate and professional) limited to a maximum 2-year admission period. This would impose hardships on students and ignores the other extensive checks that are currently in place through the Student Exchange Visitor Program (SEVP) to ensure that students and institutions are complying with all federal regulations. This provision will increase uncertainty for our international students and increase costs of participation to them and to our institutions.

We are also concerned with the new Extension of Stay process that this proposed rule creates. As the ACE letter notes, this specific change “puts federal immigration officials in charge of evaluating whether a student is making good progress, rather than the institution of higher education, which of course is best suited to make decisions regarding academic progress.” International students will be left in limbo or worse, non-compliance, through no fault of their own.

The Jesuits define global citizens as “those who continuously seek to deepen their awareness of their place and responsibility in an increasingly interconnected world, both locally and globally; those who stand in solidarity with others in the pursuit of a sustainable earth and a more humane world as true companions in the mission of reconciliation and justice.” Our goals and priorities for global citizens are not achieved by offering this kind of education only to American students; rather, they are realized through broad collaboration among people from many nations.

At this time in our history, when we recognize the interconnectedness of our world now more than ever, why would we make learners from other nations feel unwelcome at our institutions of higher education? At stake is our standing in the world and our contributions to the academic and cultural exchanges that are foundational to addressing today’s biggest challenges.

Thank you for your consideration.

Sincerely,

Rev. Michael Garanzini, S.J.
President
Association of Jesuit Colleges and Universities