

# PRESIDENTS' ALLIANCE | ON HIGHER EDUCATION AND IMMIGRATION

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April 3, 2024

Brent Parton  
Principal Deputy Assistant Secretary for Employment and Training  
United States Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

**RE: ETA–2023–0006, Labor Certification for Permanent Employment of Foreign Workers in the United States; Modernizing Schedule A To Include Consideration of Additional Occupations in Science, Technology, Engineering, and Mathematics (STEM) and Non-STEM Occupations**

Dear Mr. Parton:

On behalf of The Presidents' Alliance on Higher Education and Immigration ("Presidents' Alliance") and commenter organizations, I write to provide comment in response to the Department of Labor's request for information related to the inclusion of additional occupations in Schedule A ("Request for Information").<sup>1</sup>

The nonpartisan, nonprofit Presidents' Alliance on Higher Education and Immigration brings college and university presidents and chancellors together on the immigration issues that impact higher education, our students, campuses, communities, and the nation.<sup>2</sup> As the only national organization exclusively focused on the intersection of higher education and immigration, we work to support immigrant, international, and refugee students and to advance just, forward-looking immigration policies and practices at the federal, state, and campus levels. The Alliance is composed of over 550 leaders of public and private colleges and universities, enrolling over five million students across the United States.<sup>3</sup>

In considering whether to add occupations to Schedule A, the Presidents' Alliance suggests the Department look to trends in enrollment and graduation of international students relative to American-born students in Science, Technology, Engineering, and Math ("STEM") fields. Institutions of higher education serve as gateways to the STEM workforce, and currently, international students pursue STEM degrees at higher rates than their American-born counterparts.<sup>4</sup> This indicates a persistent lack of American-born workers qualified to fill positions in these fields.

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<sup>1</sup> 88 Fed. Reg. 88,290 (Dec. 21, 2023), <https://www.federalregister.gov/d/2023-27938>.

<sup>2</sup> Our Mission, <https://www.presidentsalliance.org/about/mission/> (last visited April 3, 2024).

<sup>3</sup> Member Presidents and Chancellors, <https://www.presidentsalliance.org/about/?member-presidents-and-chancellors> (last visited April 3, 2024).

<sup>4</sup> Elizabeth Redden, *Foreign Students and Graduate STEM Enrollment*, Inside Higher Ed (Oct. 10, 2017), [www.insidehighered.com/quicktakes/2017/10/11/foreign-students-and-graduate-stem-enrollment](http://www.insidehighered.com/quicktakes/2017/10/11/foreign-students-and-graduate-stem-enrollment).

Additionally, a failure to update Schedule A would represent a lost opportunity to provide more stability for international students seeking to invest their time and talents in this country.<sup>5</sup> Many international students pursuing STEM degrees subsequently seek employment in STEM fields in the United States through high-skilled labor visas like the H-1B. Updating Schedule A, making high-skilled immigration more predictable for international students, will redound to the benefit of our communities, economy, and national competitiveness.

If you require further information, please do not hesitate to contact Corinne Kentor at [corinne@presidentsalliance.org](mailto:corinne@presidentsalliance.org).

Sincerely,



**Miriam Feldblum**  
Executive Director  
Presidents' Alliance on Higher Education and Immigration

On behalf of the following commenter organizations:

ETS  
Institute of International Education (IIE)  
NAFSA: Association of International Educators  
Presidents' Alliance on Higher Education and Immigration

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<sup>5</sup> See Jon Marcus, *How Other Countries Are Luring Workers Trained in U.S. Universities*, Wash. Post, (June 17, 2023) (“Most international students in the United States say they want to remain, and U.S. employers need workers like them to fill jobs in areas of shortage. But only 11 percent of foreign-born U.S. university bachelor’s degree recipients and 23 percent who get master’s degrees manage to stay and work in the United States . . .”), [www.washingtonpost.com/education/2023/06/17/international-students-jobs-visas-recruiting](https://www.washingtonpost.com/education/2023/06/17/international-students-jobs-visas-recruiting).