

PRESIDENTS' ALLIANCE | ON HIGHER EDUCATION AND IMMIGRATION

Immigration Priorities of the Incoming Trump Administration and Implications for Higher Education

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Introduction

This document examines the policy priorities of the incoming Trump administration, focusing on their potential impact on immigration issues critical to U.S. higher education. It provides brief summaries of policy proposals affecting DACA recipients and undocumented students and graduates without DACA, international students and scholars, and refugee and displaced students and scholars within higher education institutions.

The analysis draws from statements by incoming President Trump and his advisors, the policy record from his first administration, and priorities emphasized during the 2024 campaign. Immigration was a central theme of the campaign, with promises to restrict legal immigration pathways, dismantle humanitarian protections, and pursue mass deportations. These proposals, if enacted, would profoundly affect immigrant communities' physical and mental well-being, harm the U.S. economy, strain foreign relations, and weaken the nation's workforce.

While this document references some aspects of Project 2025, it offers a broader perspective on likely policy actions beyond that playbook's scope. For an analysis of Project 2025's potential impact on immigration, see [this overview](#) from the Niskanen Center. For insights into immigration actions taken during the first Trump administration that impacted higher education and responses from the Presidents' Alliance, refer to [this document](#).

Undocumented and Other Immigrant Students

Effective Termination of Deferred Action for Childhood Arrivals (DACA)

Since its inception, DACA has faced continuous legal challenges and political scrutiny. The Trump administration pledged to renew efforts to terminate the program, further intensifying uncertainty about its future. The case is currently before the Fifth Circuit Court of Appeals and is likely to reach the Supreme Court. If the Supreme Court rules that DACA was unlawfully established or declines to hear an appeal of a Fifth Circuit decision, the program will be phased out. Current DACA recipients would lose their protections and work authorization as their permits expire, leaving them unable to renew their status.

While the case works its way through the courts, the Trump administration may implement barriers precluding current recipients from renewing their work authorization. Project 2025 describes DACA as an "unlawful program" that diverts resources from the central mission of U.S. Citizenship and Immigration Services (USCIS). Project 2025 recommends utilizing internal guidance documents to redirect USCIS employees and curtail their ability to process DACA applications and renewals. This action would effectively end the program by precluding prospective and continuing DACA recipients from accessing its benefits. Even minor slowdowns in processing—as we saw with all types of immigration cases during the first Trump administration—could lead to gaps in work authorization, as DACA is one of the few types of employment authorization that lacks automatic extension provisions upon filing a renewal.

The administration also aims to challenge recent expansions of the Affordable Care Act (ACA) that include DACA recipients. On December 9, 2024, a [federal judge issued a preliminary injunction](#), blocking the implementation of this policy. This decision would restrict recipients' access to health care and reinforce the message that DACA recipients and undocumented individuals without DACA should not have access to public benefits.

In a [December 2024 NBC interview](#), President-elect Trump expressed interest in working with Democrats "on a plan" for Dreamers, though he did not provide specific details.

Potential Impact:

Eliminating staff resources devoted to processing DACA renewals could effectively terminate the protections of approximately 500,000 recipients. Of the 408,000 undocumented students enrolled in higher education in 2022, an estimated 119,000 are DACA-eligible.

The elimination of DACA would have far-reaching effects on higher education, impacting both the enrolled student population and employees. Many DACA recipients serve as staff and faculty at colleges and universities, playing key roles in supporting institutional operations. Additionally, the loss of DACA protections would disrupt the lives of hundreds of thousands of program recipients who are graduates of U.S. institutions and now work in critical fields such as business, healthcare, STEM, K-12 education, and other sectors vital to the U.S. economy.

Despite these challenges, incoming President Trump's recent statement suggesting interest in bipartisan collaboration offers a potential opening for advancing permanent protections for Dreamers.

Tuition and Financial Aid Equity

Project 2025 authors and other incoming Trump administration officials have expressed interest in restricting federal funds for states and institutions that provide in-state tuition and aid to undocumented students and DACA recipients. Project 2025 specifically recommends denying access to federal loans to students enrolled in schools that provide in-state tuition to undocumented individuals.

There are also concerns that the personal identifiable information (PII) of undocumented family members who provide information to FAFSAs submitted by their citizen children (or otherwise Title IV-eligible) will be at risk. The Presidents' Alliance has released an [explainer](#) on Data Protections for FAFSA and will be monitoring the situation.

Potential Impact:

As of November 2024, 25 states and D.C. provide [in-state tuition](#) to all eligible students regardless of immigration status. 19 of these states and D.C. also provide access to [state financial aid](#). Denying federal funding to institutions or states with these policies could have massive effects on both citizen and non-citizen students, resulting in up to 67% of all Americans losing access to federal student aid, according to estimates produced by the Niskanen Center. This equates to millions of citizens and non-citizens losing access to key financing, which would destabilize institutional funding structures and imperil academic and non-academic programs across the country. If states were to comply with Project 2025's directive, undocumented students across the country could lose access to financial aid and face greater tuition and fee barriers to higher education.

Concerns about the security of information submitted as part of the FAFSA could have a chilling effect on future financial aid applications from citizens and eligible non-citizens. Without access to federal aid, these individuals would be dependent on state and institutional funding to support their postsecondary education. In addition to impacting matriculation, these concerns could necessitate changes to state aid assessment and allocation, which currently depends on the FAFSA in most cases.

Expanded Interior Enforcement

The Trump team has made it clear that they plan to explore any and all avenues to institute mass deportations of undocumented immigrants. These efforts could include a variety of interior

enforcement efforts, including targeted raids on workplaces and places of learning (potentially including K-12 schools and colleges and universities). It is widely anticipated that Trump will declare a national emergency in order to facilitate his deportation agenda. The Trump team has already begun exploring the logistics of setting up and staffing scores of new detention facilities, many of which will be housed near major cities.

In addition to physical detection and detention, the Trump administration is likely to explore any opportunities to exploit existing datasets that include information on undocumented individuals and DACA recipients. Regardless of whether or not such attempts are successful, they have already begun to instigate fear among communities, prompting warnings for families to avoid accessing benefits, including benefits for which they are eligible, such as federal financial aid for the citizen children of undocumented parents as discussed above.

Potential Impact:

Mass deportations would tear apart families and communities, deplete the U.S. workforce, and upset the balance of the U.S. economy. The fear instilled by these practices could dissuade individuals from seeking out a variety of opportunities, including access to higher education.

For more on potential enforcement in “sensitive locations,” see:

- [DACA Students, “Sanctuary Campuses,” and Institutional or Community Assistance](#) (ACE)
- [Promoting a Safe and Secure Campus for All - Guidance and Model Policies to Assist California’s Colleges and Universities in Responding to Immigration Issues](#) (CA Attorney General)
- [FAQs for Campuses on Immigration Enforcement and Site Visits](#) (Presidents’ Alliance 2020 resource, to be updated in early spring 2025).

Reinstate Changes to the Public Charge Rule

The public charge rule allows immigration officials to determine whether an individual may become a financial burden on the United States. In 2019, the Trump administration expanded the criteria for becoming a public charge such that legally authorized immigrants who were “likely” to access basic nutrition, housing, and health programs [risked losing](#) their chances of obtaining a green card or accessing other immigration pathways. These changes created additional barriers for individuals seeking an immigrant visa and for those looking to adjust immigration status inside the U.S. (e.g., moving from nonimmigrant status to lawful permanent resident status).

The Biden administration sought to mitigate these effects by implementing a revised public charge rule that went into effect on December 22, 2023. The revised rule sought to reinstate families’ access to services. During the next administration, Trump will likely seek to reverse the 2023 rule and reinstate public charge related restrictions.

Potential Impact:

Expanding the definition of public charge would present immigrants with increased barriers when seeking admission to the country or adjusting their legal status. It would also discourage individuals from accessing resources to which they are entitled, including financial support for college and assistance with basic needs requirements. Based on our knowledge of the impact of the previous changes, we anticipate the rule’s chilling effects will likely discourage eligible immigrant students and their families from accessing critical services, leading to food and

housing insecurity and worse health outcomes. The rule also has the potential to adversely affect international students and their families, citizen members of mixed-status families, and lawful permanent residents.

International Students and Scholars

In June 2024, then-candidate Trump suggested giving green cards to international student graduates. However, during the first Trump administration, international students and scholars (F and J visa holders) faced a variety of restrictions, including those that sought to minimize legal immigration based on country of origin. Between 2016 and 2019, [new international F-1 student enrollments](#) declined each year, with a cumulative drop of around 11.4%. The “travel bans” targeting Muslim-majority countries and increased security vetting of visa applicants had a marked impact on international students and scholars and their families. The first Trump administration fostered instability and anxiety among the international student population through a variety of measures. The administration sought to restrict access to OPT and CPT, revised its policy regarding when international students may accrue unlawful presence, proposed to end duration of status for F-1 visas, and threatened to rescind visas for international students when programs of study moved online in response to pandemic closures. Below are a few areas of focus we can expect during the second Trump term.

Policies Targeting Duration of Status, Unlawful Presence, CPT, and OPT

In September 2020, DHS [proposed](#) ending the “duration of status” policy for international students (F) and exchange visitors (J) and replacing it with an exact date of expiration of status. Instead of being admitted for “duration of status” (i.e., the period of their academic program), [the new rule](#) would have limited most international students to a four-year visa, with some students from predominantly African and Middle Eastern countries limited to two years. Changing the rule would have required students to apply for extensions to remain in the country, creating uncertainty and potentially increasing costs. This rule was [withdrawn](#) by the Biden administration in 2021.

The first Trump administration also introduced proposals to limit access to Optional Practical Training (OPT) and narrowed the use of Curricular Practical Training (CPT). While OPT was not formally eliminated, the administration considered [curtailing the program](#) at different points, sparking significant debate and legal challenges regarding its continuation. Similarly, in 2018, the administration [sought to revise the policy](#) on accrual of unlawful presence for international students, initiating the accrual immediately upon a status violation rather than after formal findings. In February 2020, this policy was blocked by a federal court, which ruled that it violated federal law. The incoming administration may revisit all these policies and other options for limiting opportunities for international students.

In addition to directly limiting access for international students, each of these proposals could have a chilling effect on international student enrollment and postgraduate retention. Following the 2024 election, institutions issued advisories to enrolled international students suggesting that they return to the U.S. before the January 20th inauguration. This action is indicative of campus efforts to plan and prepare their international students.

Limiting Access to H-1B Visas for Recent Graduates

H-1B visas are a key pathway for international students to transition from U.S. academic programs into the workforce. Project 2025 proposes eliminating the two lowest prevailing wage levels (Level I and II), which are commonly applicable to recent graduates in many fields. This change would effectively exclude most recent international graduates from job opportunities in the U.S. as the Department of Labor would no longer certify wages for positions that do not meet higher wage levels.

There is some debate regarding whether or not the Trump administration will limit H-1Bs or welcome “high-skilled” immigrants. The President-elect made notable remarks during the campaign regarding “stapling green cards to diplomas” for international graduates in high-needs sectors. However, this has yet to be matched by concrete policy proposals. [Analysts predict](#) that the Trump administration will implement more restrictions on H-1Bs, as they did during the first Trump presidency.

Potential Impact:

In FY2022, nearly 44% of all H-1B petitions for initial employment were issued to those changing from F1 status (nonimmigrant visa awarded to individuals enrolled in a full-time course of study in an accredited institution). Recent international student graduates will face much higher barriers to nonimmigrant employment-based visa options if Project 2025’s policy proposals are implemented. The incoming administration may also institute higher fees on H-1B applications, which could pose a financial burden for students and the companies seeking to employ them.

Travel Bans and Restricting Visa Eligibility by Country

As part of their broader plan to curb all forms of immigration, including legal immigration, the Trump administration may place restrictions on visa eligibility for applicants from certain countries.

During the first Trump administration, [country-specific bans largely affected Muslim majority countries](#) (Iran, Iraq, Libya, Somalia, Sudan, Syria, and Yemen). In the second Trump administration, visas may be restricted for applicants who hold an association with a presumed “enemy nation.” This can include Muslim-majority countries or those seen as holding an antagonistic or competitive relationship with the United States. Project 2025 specifically recommends eliminating or significantly reducing visas issued to students from such nations. International faculty and staff from these countries may face additional scrutiny and threats to academic freedom. Chinese students and scholars are particularly vulnerable to the administration’s attempt to curb malign foreign influence and “address exploitation...by authoritarian governments.” Analysts also expect to see a resurgence of the China Initiative in Congress.

The Trump administration plans to institute restrictions on countries with consistently high visa application rates and those with visa backlogs. This effort is part of the administration’s broader interest in improving the so-called “efficiency” of the federal government and curbing overall immigration numbers. Students and scholars from impacted countries may face additional difficulties in securing visa interview appointments or in seeing their applications progress.

Potential Impact:

Students and scholars from China and other targeted nations may be especially affected by attempts to curb malign foreign influence. While a focus on curbing such threats to higher education institutions has bipartisan support and has been the subject of a [2024 brief](#) from the Office of the Director of National Intelligence and a [2024 report](#) from DHS Academic Partnership Council Subcommittee, efforts under the new administration could include threats to visa renewals and greater scrutiny over the academic work of international students and scholars. Visa applicants in India—currently the largest and fastest growing source country of international students and the one that has historically seen long wait times and processing backlogs—may also be affected.

Response to Demonstrators on College Campuses

Since October 7, 2023, campuses have been embroiled in demonstrations related to ongoing conflict in Israel and Gaza. Former Trump appointees and others have [expressed criticism](#) of international students who may have engaged in campus demonstrations and have indicated their intention to curb instances of pro-Palestinian protest. This could take several forms, including [revoking visas](#) from non-citizen students engaged in protests and withholding federal funding from institutions deemed to be insufficiently responsive in curbing demonstrations.

Potential Impact:

Campuses could face increased pressure to quell student demonstrations. International student protestors could face threats to their visa status. Efforts to address specific protests could contribute to increased campus tensions, and institutions reliant on federal funding may face financial risks if deemed non-compliant with future federal mandates targeting protest management.

Refugee/Displaced Students, Staff, Faculty

Incoming Trump administration officials and Project 2025 authors have expressed an interest in curbing immigration overall, including legal immigration, refugee admissions, and humanitarian relief. Below are a few ways in which the incoming administration might seek to reduce humanitarian migration and resettlement and the potential impact on higher education.

Pausing Refugee Admissions and Dismantling the U.S. Refugee Admissions Program (USRAP)

The Trump campaign called for closing the border, stopping refugee admissions, and redirecting resources to the southern border. The Trump administration is likely to reduce if not pause refugee admissions. In its previous time in office, the Trump administration [suspended all refugee travel](#) to the United States in 2017 and limited refugee admissions from some predominantly Muslim countries. In October 2020, the Administration [limited refugee admissions](#) to 15,000 in fiscal year 2021, with the lowest Presidential Determination since the establishment of the refugee admissions program in 1980. From 2017 to 2020, 134 affiliate offices around the United States [closed](#) due to these restrictions or because of insufficient funding, representing a 38 percent decrease in the country's resettlement capacity.

In the forthcoming term, the Administration is likely to reduce funding and resources currently allocated to the Department of State and its Bureau of Population, Refugees, and Migration (PRM) to operate refugee admissions in an effort to provide additional funding for border security measures. Such action may be used to reallocate the finances needed to address the

administration's plans to mobilize ICE officers to conduct raids, process deportations, and prevent unauthorized crossings at the southern border.

As part of a broader effort to reduce program autonomy and reorganize governmental responsibilities, Project 2025 recommends moving the Office of Refugee Resettlement (ORR) under the purview of DHS. To justify this action, Project 2025 suggests that resources and programs currently provided by ORR could incentivize illegal immigration. They further allege that ORR has failed to protect unaccompanied children and to monitor their safety in the U.S. It is unclear whether or not the Trump team will pursue this action or instead reduce funding to ORR and related offices.

Potential Impact:

Pausing and/or sharply reducing refugee admissions, reducing DOS PRM resources, reducing ORR resources, and reallocating staff would effectively dismantle USRAP and severely reduce the capacity of the U.S. refugee agencies.

While Welcome Corps and Welcome Corps on Campus may not be directly or immediately targeted as a private sponsorship program, the prospects of its continuation could be severely reduced without a fully operating U.S. refugee admissions program. Additionally, resettled refugees could lose access to support services critical to their livelihood in the U.S.

Termination of Temporary Protected Status (TPS), Humanitarian Parole and Limiting Work Authorization for Non-Immigrants

The Trump administration is expected to pursue the termination of Temporary Protected Status (TPS) designations or allow existing designations to expire without providing recipients pathways to alternative statuses. Similar attempts during the first Trump administration, including efforts targeting Haiti and other countries, were blocked in the courts. These actions may be facilitated by reallocating USCIS resources away from the management of TPS programs, effectively undermining their functionality.

The administration is also likely to terminate current humanitarian parole programs, such as Uniting for Ukraine and the Cuba, Haiti, Nicaragua, and Venezuela (CHNV) program. Additionally, it may suspend or revoke parole for those currently protected under these programs, jeopardizing their legal status and ability to remain in the U.S.

Beyond TPS and parole programs, the administration may take action to limit opportunities for non-immigrants to obtain work authorization. This could include imposing additional restrictions on employment eligibility for individuals seeking asylum, further hindering their ability to support themselves while their cases are pending.

Potential Impact:

Students and employees with TPS would face severe challenges, including the loss of work authorization. DHS may also terminate Special Student Relief (SSR) as part of broader efforts to end TPS, even though these programs are not formally linked.

Terminating existing parole programs would dash the hopes of many students who entered the U.S. through these pathways and anticipate family reunification. The potential revocation of parole status could lead to work authorization loss for those not already pursuing alternative immigration pathways.