PRESIDENTS' ALLIANCE | ON HIGHER EDUCATION AND IMMIGRATION

*****DO NOT SUBMIT THIS COVER PAGE WITH YOUR COMMENT*****

**Higher Education Institution Guidance to Submit Comments for Optional Practical Training Fees**

October 2026

This document is meant to assist institutions of higher education that wish to comment on the U.S. Department of Homeland Security's (DHS) proposed rule Optional Practical Training Fees (ICEB-2026-0100), which would require colleges and universities to pay $70,000 before recommending a student for initial Optional Practical Training (OPT) and $30,000 for each subsequent recommendation, including a STEM OPT extension. **The deadline for institutions to submit comments is November 9, 2025 at 11:59 PM ET.**

The Presidents' Alliance created this document to accompany the higher-level comment guidance developed together with other Higher Education partners. While this document includes talking points to assist individual colleges and universities in drafting their respective comments regarding the proposed rule, the higher-level guidance provides suggestions for institution-specific content that would be especially valuable to include.

**Individualized institutional comment letters are incredibly useful to demonstrate the broad impact of the proposed rule on institutions of higher education and build an administrative record for future advocacy. Federal law requires that the Department read, review, and consider all comment letters.**

The following resources provide additional analysis, data, and messaging to help institutions develop their comments on the proposed OPT fee rule.

- Presidents' Alliance OPT messaging guidance - A messaging guidance to equip campuses and partners with clear, data-driven information on the program's impact.
- High-level Guidance to Submit Comments on the DHS's OPT Fee Proposed Rule - This high-level public comment guidance was developed together with other Higher Education partners to provide suggestions for institution-specific content that would be especially valuable for our respective members to include in their individual public comments.
- Institute for Progress (IFP) comment guide - IFP's OPT Comment Guidance including how to get data from the OPT Observatory. This is an excellent resource for institutions looking to identify and describe their institutional processes and data.
- IFP's explainer - IFP's analysis of the proposed rule, including the best available evidence on how the fee would affect high-skilled immigration
- OPT Observatory - IFP's interactive tool providing historical OPT data through 2022.
- NAFSA's Economic Value Tool - Annual state-by-state and congressional district analysis of the economic contributions of international students and their families to the U.S. economy.

For questions about submitting a comment or this document, please contact miriam@presidentsalliance.org or zuzana@presidentsalliance.org.

For more information on the Presidents' Alliance, please visit presidentsimmigrationalliance.org.

**Guidance on Creating your Comment Letter**

The first page of the comment letter should include (suggested inclusions in italics):

*Submitted via www.regulations.gov*

*US Immigration and Customs Enforcement*
*US Department of Homeland Security*
*5900 Capital Gateway Drive*
*Camp Springs, MD 20746*

*Re: DHS Docket No.* ICEB-2026-0100*, Comments in Response to Optional Practical Training Fees*

**Opening paragraph sample:**

*Dear Acting Director David J. Venturella,*

*On behalf of [INSTITUTION], I submit this comment letter in response to the U.S. Department of Homeland Security's (Department) proposed rule, Optional Practical Training Fees (DHS Docket No. ICEB-2026-0100), published October 8, 2026.*

**To ensure that it is categorized as a comment in opposition to the proposed rule, your letter should include a summary statement of opposition toward the beginning of the letter, such as:**

*We urge that the proposed rule be withdrawn in its entirety, and that the Optional Practical Training (OPT) program remains intact.*

**Inclusion of institution-specific information:**

Your letter can include information about your institution's location, mission, and enrollment, including F-1 international students and the number who participate in OPT and STEM OPT. Describe your institution's role as both an educator and an employer of OPT participants, including their contributions to research, teaching, and other campus functions. Include estimates of the proposed fees and implementation costs, their impact on institutional resources, and the consequences for students' access to practical training. You can also explain how international enrollment sustains programs and course offerings that benefit domestic students, and provide data on international students' economic contributions to your state and community. Examples from students, faculty, and employer partners can illustrate the potential effects on educational opportunities, research, workforce needs, and local businesses. Consider incorporating the talking points beginning on the next page that are most relevant to your institution's concerns.

**Please customize the language to make it specific to your institution.**

**Issues with Most Impact - Talking Points**

1. **The proposed rule would impose substantial financial and administrative burdens on all institutions.**

- OPT is an integral part of the American educational experience for international students, providing students workplace training directly related to their major field of study. Requiring institutions to make substantial payments before recommending eligible students would create an immense new financial barrier to providing that experience.
    - [Explain how the proposed rule would impact specifically students in your institution]
- Colleges and universities would face difficult choices about absorbing the fees, seeking payment from students or employers, or limiting access to practical training.
- Institutions with fewer financial resources would be disproportionately impacted, regardless of the quality of their programs or their compliance with existing requirements.
    - [Provide examples of how these obligations would impact institutional budgets, particularly where resources are limited or funds cannot be used for these payments.]
- The fees would divert resources from institutions' educational missions while requiring additional spending on payment systems, financial approvals, staffing, training, recordkeeping, advising, and refund management.
    - [Provide estimates of the time and cost associated with additional recordkeeping, payment processing, and a realistic implementation timeline, including the time needed to obtain approvals, establish systems, train staff, and communicate changes to students.]
- DHS argues that substantial fees would encourage institutions to exercise greater oversight and selectivity when recommending students for OPT. However, the ability to pay does not establish a student's eligibility or the educational value of practical training.
    - [Describe your institution's processes for assessing OPT eligibility and explain how the fee could prevent your campus from recommending otherwise qualified students due to lack of funding.]
- Reduced international enrollment could further undermine institutional stability and the resources available to sustain academic programs.

2. **The proposed rule would reduce international enrollment, harming local economies and communities, and weakening U.S. global competitiveness.**

- International students create opportunities for Americans. Their participation in higher education and practical training supports local businesses, job creation, entrepreneurship, and economic growth.

    - [Provide information about international students' economic and other contributions and job creation in your state. You can provide examples of contributions made by your international students/graduates if possible.]
        - International students contributed $42.9 billion to the U.S. economy and created 355,736 jobs in 2024/25
    - OPT participants do not replace American workers. They represent a small share of the labor force that sustains local businesses and creates additional opportunities for domestic employees.
        - International students make up less than 6% of all students enrolled in higher education, and only 2.2% of all undergraduates.
        - Just about 294,000 international students participated in OPT in the academic year 2024/25, contributing to employers and local economies nationwide.
- OPT enhances students' educational experiences while allowing employers and communities to benefit from the skills and knowledge they gained at U.S. institutions.
    - [Provide data on OPT and STEM OPT participation at your institution/state, including students' fields of study, types of employers, and compensation where available.]
- The proposed OPT fee rule must be taken in context with the other recent restrictions on CPT. Narrowing access to one form of practical training while making another prohibitively expensive would leave students with fewer meaningful opportunities to apply their education.
- These restrictions add to uncertainty arising from visa delays, issues with SEVIS terminations and visa revocations, threats to end duration of status, as well as changes that create barriers to international students' employment after graduation. Together, these policies and proposals create a cumulative chilling effect, discouraging international students from choosing U.S. institutions — even before proposed changes take effect.
- DHS should assess these cumulative consequences, preserve access to legitimate experiential learning, and withdraw proposed fees that would make practical training inaccessible to otherwise eligible students.
- Practical training is a major consideration for international students deciding where to study. Making it prohibitively expensive would weaken the United States' ability to attract talented students.
    - A recent survey of international students found that 37-69% of international students would not have enrolled had the OPT fees been in place, including 38-70% of STEM students.
- Graduates unable to access OPT could take the skills developed through U.S. education elsewhere, shifting potential innovation and economic contributions to other countries.
    - Students could choose competitor countries—including Canada, the United Kingdom, Australia, and Germany—that offer opportunities to gain professional experience after graduation.
    - When prospective international students choose other destinations or U.S.-educated graduates take their skills abroad, American students, campuses,

employers, and local communities lose potential educational, research, and economic benefits.
    - [Describe recent international enrollment trends and anticipated effects of the proposed fees together with the other changes impacting international students, supported by applicant feedback, student surveys, or recruitment experience.]
- Protecting OPT is essential to retaining a crucial talent pipeline and sustaining U.S. economic competitiveness.
    - [Provide data about OPT retention in your state]

**3. The proposed rule would restrict international students' access to practical training and diminish educational opportunities that also benefit domestic students.**

- Experiential learning has been a longstanding cornerstone of U.S. higher education. OPT provides temporary professional experience directly related to students' fields of study and complements classroom instruction.
- The proposed fees would prevent otherwise eligible students from accessing this educational opportunity.
    - [Provide examples of how practical training builds skills that complement classroom education and supports students' professional development.]
- The proposal would create two groups of students: those who can participate because they or their institutions can afford the fees, and those excluded despite meeting the same eligibility requirements.
    - [Provide examples of students with fewer financial resources who would face disproportionate harm or for whom the fees would be particularly prohibitive.]
- International student participation helps sustain academic programs and course offerings that also serve domestic students. Reduced enrollment could limit the availability and breadth of these opportunities.
    - [Provide data and examples showing how international enrollment supports program viability, course availability, and specialized fields of study, and how enrollment losses could reduce domestic students' access to these opportunities.]
- International students also contribute global perspectives and collaborative experiences that help domestic students develop skills for an interconnected economy.
    - [Provide examples from your campus]
- Restricting practical training would weaken the value of students' educational investments and opportunities to apply their learning.

**4. The proposed rule would disrupt research and workforce pipelines, limiting contributions to innovation and opportunities for American workers.**

- OPT connects U.S. education with practical experience in STEM, healthcare, research, and other fields important to national and regional priorities.

- Retaining U.S.-educated graduates strengthens America's research capacity and leadership in technology and other strategic sectors.
- OPT participants contribute skills that complement those of American colleagues, helping employers expand and creating additional opportunities for domestic workers.
    - [Provide examples of OPT participants contributing to discoveries, patents, startups, healthcare delivery, or other advances.]
- Restricting access could disrupt research teams, employer partnerships, and workforce pipelines, including learning and mentorship opportunities for domestic students.
    - [Provide examples of research projects and partnerships that rely on OPT participants and create opportunities for domestic students.]
- Colleges and universities also employ OPT and STEM OPT participants whose work supports research, teaching, and other institutional functions.
    - [Provide examples of international students' contributions to research projects, teaching, and other positions through the OPT and STEM OPT program.]
- Losing these employees could interrupt ongoing projects, reduce institutional capacity, and weaken the translation of research into practical benefits.
- Practical training also supports entrepreneurship. Former international students have founded approximately one quarter of the U.S. billion-dollar startups.

**Protecting OPT is essential to retaining the international talent pipeline and sustaining U.S. global competitiveness. DHS should assess the cumulative consequences of this rule in the context of other recent and upcoming policy changes, preserve access to legitimate experiential learning, and withdraw the proposed rule in its entirety.**

Institutions may also consider including information on the following important topics, as relevant to their circumstances and experience (see the IFP guidance for information):

- Describe your institution's existing investments in OPT and STEM OPT compliance, including staffing, advising, SEVIS reporting, eligibility reviews, and safeguards against fraud or abuse.
- Question DHS's justification for the proposed fee amounts and their effectiveness in preventing fraud, explaining why ability to pay does not establish compliance or distinguish legitimate participants from those engaging in misconduct.
- Identify unresolved implementation questions and their consequences for your institution and students, including when subsequent fees apply, payment procedures, refunds, transfers, and progression to higher educational levels.
- Address gaps in the government's assessment of the proposal's impacts and consideration of alternatives, using institutional evidence to explain overlooked harms, challenge assumptions, and suggest less burdensome approaches.
- Explain why the 30-day public comment period is insufficient for a thorough institutional response, describing the time needed to gather data, consult impacted stakeholders, and obtain leadership review, and request an extension.