

16 November 2015

The Honorable Jeh Johnson  
Secretary of Homeland Security  
Washington, D.C. 20528

Dear Mr. Johnson,

We are writing to you regarding the Notice of Proposed Rulemaking (NPRM) on Improving and Expanding Training Opportunities for F-1 Nonimmigrant Students With STEM Degrees and Cap-Gap Relief for All Eligible F-1 Students. The MIT Undergraduate Association (UA) represents the 4,500 undergraduate students of the Massachusetts Institute of Technology, of which around 10% are international students and a vast majority of those are in the United States on F-1 visas, so we represent a population that will be strongly affected by the Proposed Rule.

The MIT Undergraduate Association (UA) supports all measures that make it easier for qualified international students to obtain visas to study and work in the US and to leave the country freely during their studies. **Therefore, we strongly support the concept of Optional Practical Training (OPT), and we are especially excited to see the proposed duration of the STEM OPT Extension increased from 17 months to 24 months.** We are also enthusiastic about the implementation of Cap-Gap Relief for smoothing the transition between F-1 and H-1B visa status.

**We also support the proposed allowance for students with previous STEM degrees from accredited US universities to be eligible for the STEM OPT extension and increasing the number of extensions up to two.** This provision is relevant for current undergraduate STEM majors who are interested in pursuing additional higher degrees, making them even more valuable to the United States for their interdisciplinary skills and advanced technical training. However, given the fast changing STEM landscape, **we strongly recommend a regular review system for maintaining transparency and updating the eligible degree list.**

**We are highly concerned with the possibility that the ability of students to make use of the STEM OPT Extension might be disrupted by recent court actions, upcoming court actions, and delays in this rulemaking process.** We commend DHS and the Office of Management and Budget (OMB) for responding quickly to recent developments to begin this rulemaking process, and we urge you to continue working quickly to ensure that suitable transition procedures are in place to make it possible for students on STEM OPT Extensions to keep working as we approach and pass the court's February 12, 2016 deadline. In particular, for students whose 17-month STEM OPT extension will expire in the interim of the decision making process, **we advocate for a 2 month or longer grace period for which to apply for the additional 7 months.**

We are also concerned with **the Mentoring and Training Program administrative burdens that may deter employers**, especially small companies that lack sufficient resources, from employing F-1 STEM students.

We appreciate the opportunity to comment on this proposed rule and thank you for all of your hard work in keeping America safe and providing educational and training opportunities to F-1 students.

Best regards,

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