November 9, 2026

Submitted via Regulations.gov

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

Re: **Optional Practical Training Fees**
DHS Docket No. ICEB-2026-0100
RIN 1653-AB01
Joint letter of 57 Multi-Sector Organizations Opposing costly DHS OPT proposal

Dear Acting Director Venturella,

The undersigned 57 organizations represent a broad coalition spanning small business representatives, local economic development organizations, the scientific community, research organizations, universities, education associations and advocates, policy think tanks, and coalitions between business and higher education. We respectfully write in opposition to your agency's proposal to substantially increase fees for the Optional Practical Training (OPT) program. We believe that such fees will dramatically shrink the program, deter top talent from coming to the United States, and impose high, ongoing costs on the American economy.

Attracting and retaining international students is critical to American innovation and economic prosperity.

America's ability to attract and retain top students from around the world is one of its greatest assets. International students who transition to the US workforce go on to earn high salaries, start businesses that employ Americans, and contribute disproportionately to innovation.[1] Skilled immigrants like those who come to the United States through our student visa program help make American firms and workers more productive, contributing to long-term economic growth.[2]

The international student pipeline is the front door of America's skilled immigration system. The OPT program is the primary pathway by which America retains skilled graduates and transitions them into the workforce. Subsequently, the H-1B program draws most of its applicants, including many of its most highly paid applicants, from OPT. DHS's proposal therefore threatens a key source of American economic leadership, which the agency does not account for in its Notice of Proposed Rule Making.

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[1] Connor O'Brien, "Student visas are a critical pipeline for high-skilled, highly-paid talent," Economic Innovation Group (Jun. 12, 2025).
[2] Shai Bernstein, Rebecca Diamond, Abhisit Jiranaphawiboon, Timothy McQuade, and Beatriz Pousada, "The Contribution of High-Skilled Immigrants to Innovation in the United States," *American Economic Review*, forthcoming.

We believe that the United States needs to do much more to develop and train domestic talent in critical and emerging fields, including by expanding training and educational opportunities. Alongside that, our ability to retain top international students yields massive benefits for American scientific, technological, and economic progress.

DHS's proposed fee threatens American scientific research and development.

DHS's proposed fees on OPT will deal a major blow to American scientific research and development. Our experience shows that OPT is a critical tool for attracting and retaining key, early-career scientists and researchers, whether in the public, private, or non-profit sectors. Prohibitive fees on the program will make recruiting top graduates in the sciences much more challenging.

Alongside domestic peers, international students contribute enormously to American leadership in science and technology. According to the Center for Security and Emerging Technology, nearly half of recent American winners of the Nobel Prize, Lasker Award, Turing Award, and MIT Technology Review's Innovators Under 35 Award were foreign-born. Of those, two-thirds first came to the United States as students.[3] International students on nonimmigrant visas account for 46% of graduates from American STEM master's programs and 45% of STEM PhD programs.[4] DHS's proposed fees will function as a large tax on a major source of scientific talent on which US firms, universities, and research labs have come to rely.

DHS's proposed OPT fees will dramatically reduce the size of the program, but DHS ignores this by providing an incomplete and inaccurate impact analysis.

We believe that the fees proposed by DHS in this rule — $70,000 for a first-time OPT participant and $30,000 for subsequent participation (including STEM OPT) — will be prohibitive for most universities, employers, and students.

Based on our experience, the agency's projections for how the proposed fee would affect STEM OPT participation are woefully inaccurate. In both the agency's "high participation" and "low participation" scenarios, the rule projects that 100 percent of all STEM OPT-eligible graduates will participate in both the 12-month OPT program and the STEM OPT extension, incurring fees totaling at least $100,000. The scenarios offered by the agency are not accurate estimates of the likely effect of the policy, nor do they align with our experience of the effects of large increases in employment costs.

DHS's September 2026 data on the H-1B visa program provides further evidence that large fees on the employment of foreign professionals are likely to shrink the OPT program by more than

[3] Adrian Thinnyun, Kelly Beavan, and Zachary Arnold, " How Global Talent Pathways Shape U.S. STEM Award Achievement," data brief (Center for Security and Emerging Technology, September 2026).
[4] "Table 318.45. Number and percentage distribution of science, technology, engineering, and mathematics (STEM) degrees/certificates conferred by postsecondary institutions, by race/ ethnicity, level of degree/certificate, and sex of student: Academic years 2012-13 through 2022-22," Digest of Education Statistics, National Center for Education Statistics, (December 2024).

the agency expects. According to DHS, H-1B petitions subject to the 2025 presidential proclamation imposing a $100,000 fee were down at least 91 percent. Moreover, an H-1B visa can be renewed for a total of at least six years, while OPT and the STEM OPT extension are a combined three years. This means the agency's proposed OPT fees are at least twice the per-year cost of the administration's desired H-1B fee.

The proposed fees will deter enrollment of international students in the US, leading to a smaller economy and fewer opportunities for American students — risks DHS fails to account for.

Over time, shrinking the OPT program will impose high costs on the American economy that the agency did not account for in its proposed rule.

First, the proposed fees will reduce the number of STEM graduates working in the United States. Over time, this will lead to lower productivity growth and a smaller American economy. According to one estimate, the likely decline in OPT participation will shrink the US economy by between $110 billion and $744 billion per year after a decade.[5]

Second, we expect the proposed fees on the OPT program to significantly deter the enrollment of international students at US colleges and universities. We say this as organizations that regularly work with international students, directly or indirectly. Our experience is also validated by empirical research from a leading immigration economist.[6] The agency does not even attempt to estimate likely enrollment effects in its proposed rule.

The ability to participate in OPT is a key reason why many international students choose to study in the United States over other potential destinations. A majority of F-1 graduates, and nearly two-thirds of STEM graduates, participate in OPT. Universities have made substantial long-term, institutional investments and plans based on the longstanding fact that eligible international students can stay in the United States after graduation to pursue opportunities related to their field of study. Such investments and plans will be deeply and suddenly disrupted by the agency's proposed fees.

Third, deterring international students from studying in the United States will also detract from opportunities for American students. International student enrollment allows US colleges and universities to expand offerings to American students at both the undergraduate and graduate levels. DHS's proposed fees, and the effects they have on enrollment, will disrupt these opportunities.

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[5] Institute for Progress, "DHS's $100k Fee on STEM OPT Would Break High-Skilled Immigration," (Oct. 12, 2026).

[6] Notably, the economist Michael Clemens studied the likely impact of the types of fees DHS is proposing and found that there would be a significant enrollment decline of international students as a result, validating our intuition and experience. Michael Clemens discussion paper on Taxes on International Students (IZA Sept 2026). And a recent survey of international students validates our assessment of the expected dramatic reduction in international student enrollment, finding that 37-69% of international students would not have enrolled had the OPT fees been in place, including 38-70% of STEM students.

Conclusion

Given the enormous cost the agency's proposed OPT fees will impose on universities, employers, students, and the American economy, DHS should withdraw the proposed rule and consider alternative, less burdensome policies to ensure the integrity of the OPT program.

Sincerely,

Business, Workforce, and Entrepreneurship
Algorizin, Inc.
Center for American Entrepreneurship
Compete America Coalition
Global Cleveland
Global Detroit
Greater Cleveland Partnership
Greater Houston LGBTQ+ Chamber of Commerce
National Venture Capital Association (NVCA)
Northern Michigan Chamber Alliance
Small Business Majority
TechNet
Traverse Connect

Science
American Association for Dental, Oral, and Craniofacial Research
American Association of Colleges of Pharmacy
American Astronomical Society
American Chemical Society
American Geophysical Union (AGU)
American Institute of Biological Sciences
American Mathematical Society
American Physical Society
American Physical Therapy Association
American Physiological Society
American Society for Pharmacology and Experimental Therapeutics (ASPET)
American Society of Plant Biologists (ASPB)
Association for Women in Science
Biophysical Society
Geological Society of America
Gerontological Society of America
Natural Science Collections Alliance
Optica
Research!America
SPIE, the international society for optics and photonics

Education

Alliance for International Exchange
American Association of Physics Teachers
American Association of Veterinary Medical Colleges
American Dental Education Association
American Federation of Teachers (AFT)
Association of Public and Land-grant Universities (APLU)
CareerLadder
Catholic University of America
College for Creative Studies
Council on Social Work Education (CSWE)
International Student Resource Center
Middle States Commission on Higher Education
National Postdoctoral Association
Presidents' Alliance for Higher Education and Immigration
Roosevelt University
Ternity Education

Policy

Center for Strategy and Applied Insights at Fragomen
Council on National Security and Immigration (CNSI)
Economic Innovation Group
FWD.us
Institute for Progress
Public Policy Associates
Refugee Advocacy Lab
U.S. for Success Coalition
Welcoming America