July 8, 2020

Matthew T. Albence  
Deputy Director and Senior Official Performing the Duties of the Director  
Immigration and Customs Enforcement  
500 12th St., NW  
Washington, DC 20536

Dear Mr. Albence:

The American Historical Association urges U.S. Immigration and Customs Enforcement (ICE) to reverse the July 6 decision that effectively ends the temporary exemption for nonimmigrant international students to pursue online education during the upcoming (Fall 2020) academic semester. Many colleges and universities have moved their entire curricula online this Fall in order to protect the health of campus communities during the COVID-19 crisis. With the modification to the temporary exception, international students with F-1 and M-1 visas who would normally attend in-person classes will now be forced to leave the United States with potentially catastrophic implications for their education. Such a course of action is not only damaging to these international students who have invested in the American higher education system but to all students and institutions of American higher education.

To require international students to abandon the country and potentially their courses of study at colleges and universities that have temporarily changed their teaching modality to online classes has the following negative effects:

- The revision will needlessly harm the education of both international students and their US citizen and resident counterparts with whom they interact, or in some instances, whom they serve as graduate teaching assistants.
- It will harm US competitiveness as these international students undertake their educations in other countries, whose economies will benefit at the expense of the United States.
- It will undermine the economic viability of some US colleges and universities by removing students from their rosters, thereby placing the burden for lost revenue on the remaining US resident- and citizen-students.

The logic for prohibiting international students from pursuing full-time online education in the United States is predicated on the idea that these students should interact with their American counterparts. In the current moment, that may not be possible. ICE should therefore extend the wise and temporary exception to this rule as it did for the Spring and Summer 2020 semesters.

Sincerely,

James Grossman  
Executive Director