

## AHA Comment to the Federal Register

RE: Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media

2025-16554 (90 FR 42070)

The American Historical Association urges rejection of the proposed rule. The AHA represents the interests of the professional historical community, including thousands of scholars who come to the US to study and work. This proposed rule poses undue hardship on foreign students and scholars, threatens American scholarly leadership, and would damage the American economy.

Since World War II, the world's best students have flocked to US universities. In turn, nations across the world have opened their libraries, archives, and classrooms to American students and researchers. The result has been an exponential rise in scholarly output and unprecedented levels of mutually beneficial exchange.

These exchanges foster excellence in history and other fields. In recent years, reasonable regulations for F, J, and I nonimmigrant visas have been key to attracting and retaining international talent and cementing the US as the great champion of the free exchange of ideas. The proposed visa restrictions will lead international students and scholars to take their expertise, goodwill, and wealth to other countries. In discouraging such free exchanges, the US risks losing its status as the foremost global driver of research in history and related fields.

Threats to international scholars' travel and exchange threaten American scholarly prestige. The world's best students and scholars will choose to avoid bureaucratic hassles such as restrictions on changing institutions (should their advisors move institutions, for example) or the 4-year limitation, an inadequate period of time to complete a doctoral degree in virtually any humanities field, including history, for which the median time to degree is 7 to 8 years.

The negative impacts of current and proposed restrictions are already evident. Institutions abroad are luring talented students and faculty away from the US. Spain and France have relaxed visa rules to draw international students barred from the US by the current Administration

(<https://www.reuters.com/world/spain-eases-visa-rules-draw-foreign-students-barred-us-by-trump-2025-06-24/>; <https://www.npr.org/2025/04/18/nx-s1-5368132/us-researchers-scientists-apply-french-university-program>). Universities in Korea, Japan, and Hong Kong are opening doors to students and faculty in the US following threats to Harvard's international student enrollment (<https://kcampus.kr/news/a-k-wave-hits-campus-as-korea-university-rethinks-student-life-for-a-global-generation-6809>). Other countries will succeed if the US gives up its storied tradition of welcoming the world's future scholarly leaders.

The loss of top foreign talent will have an immediate catastrophic impact on the US economy. Most international students pay for their own studies. In 2023, they contributed \$43.8 billion to the US economy through tuition, travel, housing, food and other taxable sale items, and visa fees (<https://www.nafsa.org/policy-and-advocacy/policy-resources/nafsa-international-student-economic-value-tool-v2>). In AY2013–23, international students created and supported an average of 389,333 jobs per year across the 50 states and DC. For every 3 international students, one US job is created and supported by spending in the higher education, accommodation, dining, retail, transportation, telecommunications, and health insurance sectors. A 2018 report found that almost a quarter of US startup companies valued at \$1 billion or more had a founder who first came to America as an international student (<https://nfap.com/wp-content/uploads/2018/10/2018-BILLION-DOLLAR-STARTUPS.NFAP-Policy-Brief.2018-1.pdf>).

International students pay higher tuition and fees, which offsets costs to admit domestic students, thus enabling more domestic students (particularly from lower-income backgrounds) to enroll in universities and colleges. This is particularly important for liberal arts colleges, regional universities, and faith-based institutions that mostly rely on international student revenues and have faced the sharpest immediate decline in international enrollment due to current and proposed restrictions. Lee University, a Christian institution in Tennessee, has seen an estimated 39% decline in international student enrollment for the Fall 2025 semester (<https://www.insidehighered.com/news/global/international-students-us/2025/09/23/international-enrollment-down-small-regional>; <https://salinapost.com/posts/38edeaeb-c3f3-4636-8921-3d8903bf9ea9>).

All states benefit economically from international students. Even Wyoming and Alaska—which enrolled the fewest international students in AY2023 at 839 and 297 students, respectively—gained millions of dollars as a result of international admits. \$21.6 million (WY) and \$10.1 million (AK) represents a significant investment in state economies. The proposed rule would harm the economies of all states.

To safeguard US world leadership in historical scholarship, the AHA urges that the entire proposed rule be rejected.