



September 30, 2026

Rebecca Pasini
Deputy Assistant Secretary for Private Sector Exchange
U.S. Department of State
SA-5, 5th Floor
2200 C Street NW
Washington, DC 20522

RE: Docket ID: DOS-2026-0859

Dear Deputy Assistant Secretary Pasini,

On behalf of the American Council on Education (ACE) and the undersigned higher education associations, we write in response to the proposed rule regarding the termination of J-1 exchange visitor program participation under 22 CFR § 62.40. The proposed rule provides an additional basis for terminating an individual's participation in the J-1 exchange visitor program when he or she "falsifies or fails to provide a full and truthful response, information, or documents as part of his or her exchange visitor application or during the ongoing exchange program." It also expands the circumstances under which the State Department can terminate a J-1 visa holder's program participation after a visa is revoked with immediate effect, requiring the individual to immediately leave the country or risk removal.

The J-1 exchange visitor program is a critical citizen diplomacy program, fostering the exchange of knowledge, training, and experience to the benefit of the United States as well as the participant's home country. It is also an important nonimmigrant category for postdoctoral researchers, medical residents, and other scholars not otherwise offered employment on an H-1B visa or directly enrolled in a college or university as a full-time student on an F-1 visa. The program also allows universities to attract and retain professors, physicians, and other research scholars in key short-term roles.

We are particularly interested in how the Department will make determinations to revoke J-1 visas in light of widespread actions in 2025 to terminate student visas and statuses.¹ At that time, the higher education community sought clarity amidst reports that student visas were being revoked and records terminated in the Student and Exchange Visitor Information System (SEVIS) without adequate notification, justification, or ability to cure an error. We are especially concerned about the rule's proposed authority to terminate a J-1 exchange visitor's program participation after a visa is revoked with "immediate effect" without a greater understanding of the basis available to the agency to take such action and without the ability to challenge such a determination.

¹ Remarks by Secretary of State Rubio on the revocation of student visas, March 27, 2025. <https://www.c-span.org/clip/news-conference/secretary-rubio-defends-revoking-turkish-students-visa/5158479>

As you know, over 1 million international students annually attend U.S. colleges and universities, yielding an estimated economic impact of \$42.9 billion across this country and supporting the creation of over 355,000 domestic jobs.² In higher education, J-1 visa holders are predominantly in STEM disciplines. If implemented, this proposal will have a direct and dire impact on the foreign-born research scholars, professors, and medical graduates in residency and fellowship programs who contribute to the intellectual vibrancy on our campuses and the global literacy of domestic students. President Trump has previously expressed support for the United States being the destination of choice for the world's most talented students and scholars.³ However, this proposed rule, when taken alongside other regulatory proposals and actions, such as ending duration of status, anticipated restrictions placed on Optional Practical Training (OPT), changes to Curricular Practical Training (CPT), and limits on employment-based benefits, will likely compound historic drops in our international student enrollment, which is expected to decline further in the 2026-2027 academic year.⁴

We support the need for the federal government to safeguard national security and reduce fraud in administering our nation's immigration system. We also remain steadfast in our efforts to ensure compliance with all requirements. However, this broad expansion of reasons to terminate J-1 exchange visitor program participation, following the 2025 actions, could further discourage and contribute to uncertainty for current and prospective students, scholars, and other exchange visitors. We support the expansion of authority within the proposed rule to terminate program participation for those who falsify information on their petitions or applications if that conduct is willful. We appreciate the establishment of a process to challenge determinations made on the falsification portion.

Given these concerns, we urge the State Department to withdraw this problematic proposed rule. We hope you will consider higher education as an important stakeholder, encourage international student enrollment, and protect the global competitiveness of U.S. colleges and universities.

Sincerely,



Ted Mitchell, President

On behalf of:

² 2024-2025 Academic year NAFSA international student economic value tool.

https://www.nafsa.org/sites/default/files/media/document/EconValue2025_v01_11-12-2025.pdf

³ The PIE News, "Trump backs Chinese students as US confidence wanes," May 20, 2026. <https://thepienews.com/trump-backs-chinese-students-as-us-confidence-wanes/>

⁴ NAFSA "New Research: Loss of 111,000 International Students Could Cost the U.S. Economy \$3.4 Billion and Nearly 40,000 Jobs," August 2026. <https://www.nafsa.org/fall2026outlook>

ACPA-College Student Educators International
American Association of Colleges and Universities
American Association of Colleges for Teacher Education
American Association of Collegiate Registrars and Admissions Officers
American Association of State Colleges and Universities
American Association of Veterinary Medical Colleges
American Council on Education
American Council of Learned Societies
American Dental Education Association
American Indian Higher Education Consortium
Association of American Universities
Association of Governing Boards of Universities and Colleges
Association of Jesuit Colleges and Universities
Career Education Colleges and Universities
COGR
College and University Professional Association for Human Resources
Council for Advancement and Support of Education
Council of Graduate Schools
EDUCAUSE
Hispanic Association of Colleges and Universities
NASPA-Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
National Association of College and University Business Officers
National Association of Colleges and Employers
National Association of Independent Colleges and Universities
National Council of University Research Administrators
National Postdoctoral Association
Presidents' Alliance on Higher Education and Immigration
UPCEA, The Online and Professional Education Association