

September 29, 2025

Honorable Kristi Noem Secretary,
U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street NW Washington, DC 20503

RE: Docket ID ICEB-2025-0001

Dear Secretary Noem,

On behalf of the Society for Industrial and Applied Mathematics (SIAM) – which represents an international community of 14,000 individual members, almost 500 academic, manufacturing, research and development, service and consulting organizations, government, and military organizations worldwide – we appreciate the opportunity to submit comments for the U.S. Department of Homeland Security’s (DHS) proposed rule, *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*. Our members come from many different STEM disciplines but have a common interest in developing and using mathematical and computational sciences approaches and tools to advance science and engineering. SIAM has concerns that the proposed rule would threaten the sustainability of STEM PhD programs, accelerate the decline of international enrollment, and harm the U.S.’s ability to attract and retain top international talent. SIAM urges the Department to reexamine these proposed changes.

By allowing students flexibility as they continue their academic studies, the Duration of Status policy has supported the success of international STEM scholars. It provides the necessary adaptability for students to manage the rigor of graduate education and address unexpected challenges. The proposed fixed admission window of four years is fundamentally unrealistic for the vast majority of PhD programs in STEM fields, including the mathematical and computational sciences. According to the [2023 Survey of Earned Doctorates from the National Center for Science and Engineering Statistics](#), PhD students spend a median time of 5.7 years towards their doctorate, and 5.6 years for programs in the science and engineering fields. Imposing a four-year cap would force nearly all international STEM PhD students to apply for the Extension of Stay (EOS) process, increasing burden and uncertainty for students and universities. Such uncertainty, may deter top international candidates from choosing U.S. institutions, and risks disrupting long-term scientific training in the U.S.

Historically, the demographic of U.S. doctoral programs in STEM have been determined by supply and demand and have been successfully “self-regulated.” The proposed rule would disrupt this self-regulating and well-functioning system by inserting rigid limitations that do not reflect academic realities. The proposed rule threatens not only international students but the health and sustainability of STEM PhD programs, which depend on robust and predictable enrollment pipelines. According to the [National Center for Education Statistics](#), in the 2021-2022 academic year, 58% of all STEM doctorate degrees were conferred to international students. Departments across the

country, particularly in mathematics, physics, engineering, and computer science, already struggle to attract sufficient numbers of qualified domestic applicants. If international enrollment declines, PhD programs could be forced to downsize or even close, negatively impacting opportunities for domestic students as well. As a result, this rule will directly harm U.S. competitiveness in science by weakening the infrastructure of graduate STEM education.

According to the American Association for the Advancement of Sciences (AAAS), internal student enrollment in U.S. higher education is in sharp decline and the NAFSA: Association of International Educators estimates [a 30-40% drop in new international student enrollment](#). Implementing this rule will accelerate this decline.

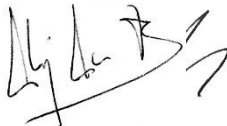
The United States has long been a global leader in science, technology, engineering, and mathematics due in large part to its ability to attract and retain top international talent. This proposed rule threatens that leadership. SIAM urges the Department to reconsider the proposed changes and preserve the flexibility that the duration of status policy allows for international students.

We thank the Department for the opportunity to comment on this proposed rule.

Sincerely,



Suzanne L. Weekes
Chief Executive Officer



Alejandro Aceves
Vice President for Science Policy