

EnglishUSA, TESOL International Association, and UCIEP Oppose ICE Guidance on International English Language Program Students for Fall 2020

EnglishUSA, TESOL International Association, and UCIEP strongly oppose the guidance released on July 6, 2020, by U.S. Immigration and Customs Enforcement (ICE), announcing that non-immigrant F-1 and M-1 international students enrolled at institutions offering only online courses for Fall 2020 will be required to either transfer to schools holding in-person classes or else exit the United States. This presents international students, institution leaders, and community and state leadership with unreasonable choices that pit the safety and health of the campus and surrounding community against the economic survival of universities, colleges, and English language programs. As associations that represent English language programs across the country, we are very concerned that the guidance places an undue additional burden on English language students and their programs by withholding all flexibility in course delivery methods, limiting choices to either a fully face-to-face program or no program at all.

This roll-back of the previous temporary procedural adaptations, issued in March 2020, that were afforded to international students and their institutions is contradictory to the White House's approach to managing the COVID-19 outbreak. This approach has been to allow state and local leaders to make public health decisions according to the needs of their communities. The new guidance is also an extension of policies that project the appearance of hostility toward international visitors and risks further damaging the economic and cultural well-being of U.S. institutions. Our nation's language programs, colleges and universities continue to plan for the Fall 2020 semester with common-sense strategies that take into account many variable factors including local and state mandates, rates of infection, institutional capacities for managing social distancing, and the testing and healthcare needed for students, instructors, and staff. The new nation-wide one-size-fits-all guidance raises a multitude of questions. Already-vetted students who are currently in the U.S., renting apartments, taking classes online, and contributing to locally depressed economies do not pose a threat to national security. The guidance for fall 2020, however, creates the threat of collapsing the English language training industry and seriously damaging the economic futures of several universities, schools and programs by eliminating current international students from their present-day enrollment. Further, the reputation of the U.S. higher education system, the gold standard for the world and one of our most valuable service-industry exports, will be greatly tarnished in the eyes of international student markets worldwide.

The United States cannot afford to alienate, let alone to lose, our international students. In our current economy with unemployment in double digits, colleges, universities, and English language programs have already cut jobs and programs to mitigate losses in federal and state support, and reductions in domestic student enrollment. International students, who typically pay full tuition and

contribute over \$40 billion to our national economy each year, make up 5% of total enrollments in higher education.

We urge SEVP to continue with the temporary procedural adaptations implemented in March 2020 through at least the remainder of 2020, if not all of the 2020-21 academic year. Those procedural adaptations will provide thousands of U.S. institutions of higher education the flexibility that they need to support their international students as they move to implement varying and nuanced strategies to manage public health and safety in ways that will conform to the local context while also balancing the needs of institutional health and wealth. Providing international students with the option to continue their education in the U.S. under extenuating circumstances and in whatever format their chosen institution adopts is the best way to ensure that future international students continue to choose an education in the United States for the right reasons.

EnglishUSA is the largest professional non-profit membership association of over 350 high quality, accredited post-secondary English language programs—including intensive English programs and pathway programs. EnglishUSA’s mission is to represent and support English language programs in the USA. To learn more visit www.englishusa.org.

TESOL International Association is the trusted global authority for knowledge and expertise in English language teaching. A professional community of more than 10,000 educators representing over 150 countries, TESOL fosters the exchange of ideas to advance the expertise of those teaching English while supporting equity, diversity, and multilingualism. For over 50 years, TESOL has strived to advance its mission with programs, publications, and services to expand its global presence and connectivity throughout the field, share its knowledge and expertise, and amplify its voice through advocacy. For more information, please visit www.tesol.org.

UCIEP is an independent non-profit consortium of university and college-administered intensive English programs in the United States with the mission to support and strengthen university-governed intensive English program leadership through collegial engagement, applied research, IEP advocacy, and the active promotion of the highest professional standards. To learn more visit www.uciep.org.