THE NEW ENGLAND COUNCIL

November 9, 2026

Submitted via http://www.regulations.gov
Department of Homeland Security
8 CFR Part 214
[DHS Docket No. ICEB-2026-0100]
RIN 1653-AB01

Department of Homeland Security
500 12th Street SW
Washington, DC 20536-590

To whom it may concern,

I write on behalf of the New England Council to express our significant concerns regarding the proposed rule, "Optional Practical Training Fees." As you are aware, under this proposed rule, fees would apply for each F-1 nonimmigrant student to engage in OPT through a Student and Exchange Visitor Program-certified institution: $70,000 for initial OPT; and $30,000 for any subsequent OPT. DHS proposes that this rule will help prevent fraud. In reality, it will raise the cost of hiring and training international graduates, weaken the talent pipeline that New England employers depend on, and contribute to a brain drain from the US to our competitors as researchers go elsewhere. To remain competitive globally, we must attract and maintain the best talent. We urge DHS to withdraw the proposal.

The New England Council is a non-partisan alliance of more than 600 businesses, academic and health institutions, and public and private organizations throughout New England formed to promote economic growth and a high quality of life in the New England region. As the nation's oldest regional business association, we count among our members a wide array of institutions, including dozens of colleges and universities, as well as hundreds of businesses across an array of industries who employ thousands of workers in the STEM fields.

OPT is the largest lawful pathway for global STEM talent to enter the United States, with OPT and STEM OPT often serving as the bridge between universities and the labor market, including for many of our members. Employers use that bridge to hire graduates that, in many instances, they have already trained and evaluated, filling positions in critical fields like healthcare, technology, education, and research.

The proposed fees would disrupt that pipeline. DHS acknowledges that the fees are a "significant increase" in the cost of OPT and that it "cannot confidently predict" the effect on participation. [1] Survey data also suggests as much as an 82 percent decline in the share of STEM OPT-eligible students who would try to remain in the U.S. after graduation. [2] This would severely undermine a core talent pipeline for New England employers.

In turn, DHS suggests that schools may pass the fee on to students or employers. For employers, that means a charge of up to $100,000 per OPT hire for a worker with a short time horizon. Startups, community health centers, non-profits, and small and mid-sized firms that make up much of New England's innovation economy cannot absorb those costs, and smaller employers would lose access to talented graduates.

Across New England, international students contribute nearly $5 billion to our region's economy. These students support 40,968 jobs, and 119,334 international students are enrolled in our region's colleges and universities. By state, the numbers are:

- Connecticut[3]
    - Financial Contribution: $747.7 million
    - Jobs Supported: 5,848
    - International Students Enrolled: 21,865
- Maine[4]
    - Financial Contribution: $87.3 Million
    - Jobs Supported: 499
    - International Students Enrolled: 2,306
- Massachusetts[5]
    - Financial Contribution: $3.6 billion
    - Jobs Supported: 30,805
    - International Students Enrolled: 84,097
- New Hampshire[6]
    - Financial Contribution: $160.4 million
    - Jobs Supported: 1,263

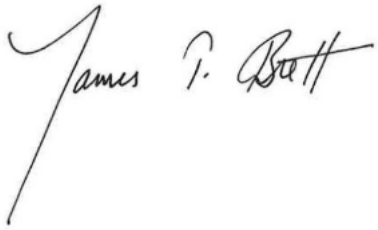
[1] Optional Practical Training Fees. 64582, 64588.
[2] Neufeld, J. (2026). International Student Survey on OPT and Experiential Learning. *Institute for Progress*. ifp.org/wp-content/uploads/26-10-06-International-Student-Survey-on-OPT-and-Experiential-Learning.pdf.
[3] https://www.nafsa.org/isev/reports/state?year=2024&state=CT
[4] https://www.nafsa.org/isev/reports/state?year=2024&state=ME
[5] https://www.nafsa.org/isev/reports/state?year=2024&state=MA
[6] https://www.nafsa.org/isev/reports/state?year=2024&state=NH

- International Students Enrolled: 4,575
- Rhode Island[7]
  - Financial Contribution: $272.4 Million
  - Jobs Supported: 2,217
  - International Students Enrolled: 5,212
- Vermont[8]
  - Financial Contribution: $57.6 million
  - Jobs Supported: 336
  - International Students Enrolled: 1,279

Studies estimate that a decline in STEM OPT participation resulting from DHS's proposal could reduce U.S. GDP by at least $110 billion annually after 10 years.[9] New England's concentration of health, technology, life sciences, and education employers makes it especially vulnerable to the consequences of any reduction in OPT.

Hindering the ability for international students to work and study in the US would have a devastating impact on the New England economy. We appreciate your careful consideration of these serious concerns as you proceed with the rulemaking process. Please contact Mariah Healy, Director of Federal Affairs, at mhealy@newenglandcouncil.com with any questions.

Sincerely,



James T. Brett

President and CEO

[7] https://www.nafsa.org/isev/reports/state?year=2024&state=RI
[8] https://www.nafsa.org/isev/reports/state?year=2024&state=VT
[9] Clemens, M. A., Neufeld, J., & Nice, A. M. (2026). Brain Freeze: How International Student Exclusion Will Shape the STEM Workforce and Economic Growth in the United States. *IZA Discussion Paper*, 18548. hwww.iza.org/publications/dp/18548.