COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK

OFFICE OF THE PROVOST

November 9, 2026

Submitted via www.regulations.gov

The Honorable Markwayne Mullin
Secretary of Homeland Security
Washington, DC USA

Re: **Comment from Columbia University in the City of New York on the Proposed Optional Practical Training Fees, DHS Docket No. ICEB–2026–0100**

Dear Secretary Mullin,

Columbia University in the City of New York respectfully submits these comments in response to the Department of Homeland Security's (DHS) Notice of Proposed Rulemaking published in the Federal Register, proposing significant fee increases of $70,000 for initial Optional Practical Training (OPT) and $30,000 for STEM OPT extensions. These unprecedented fee increases would fundamentally reshape the OPT program, harming Columbia and similar institutions of higher education as well as the nation. For the reasons set forth below, Columbia opposes this fee increase and respectfully encourages the Department to withdraw the proposal.

I. BACKGROUND

Columbia University, originally founded in 1754 as King's College, is the oldest institution of higher education in New York State and the fifth oldest in the United States. Throughout its history, Columbia has had the honor to educate outstanding international students, including founding father Alexander Hamilton. Of the 89 Columbians who have won a Nobel Prize, 29 of them were foreign-born.

Columbia is a private, nonprofit, research university located in New York City and is comprised of 17 schools, enrolling approximately 36,000 undergraduate, graduate, and professional students, employing approximately 4,500 full-time faculty members and 20,000 staff members. The University is a leading center for teaching, research, and clinical care, with more than 200 research centers and institutes spanning the humanities, social sciences, natural sciences, engineering, medicine, law, business, and other professional disciplines. Columbia researchers are pioneering new approaches to treating Alzheimer's disease, cancer, and diabetes, and its scholars and engineers are advancing new technologies helping to shape the future of artificial intelligence and other emerging technologies that power the U.S. economy. International students and scholars are integral to Columbia's success in

advancing these breakthroughs. They contribute significantly to advancing the University's academic mission and research enterprise and are a vital part of the intellectual vibrancy of our academic community. Their contributions extend far beyond our campus.

Through excellence in education and research, Columbia is committed to supporting domestic and international students to achieve their highest potential to make meaningful contributions to society, which often includes the ability to study in practical settings as currently allowed by the OPT program. OPT enables our international graduates to contribute to life-saving medical research, develop emerging technologies, and strengthen pipelines of scientists, researchers, physicians, engineers, entrepreneurs, and legal experts, who drive American innovation, power U.S. businesses, and sustain our country's economic competitiveness and leadership in critical industries. For Columbia graduates, the time spent in OPT is a critical part of their educational training, much like an apprenticeship. The proposed rule would curtail this essential part of students' education and hinder economic development locally and nationally. For these reasons, Columbia disagrees with the proposed rule and urges DHS to reconsider.

II. DHS DOES NOT ADEQUATELY ACCOUNT FOR THE EFFECT OF OPT PARTICIPANTS ON OUR NATION'S ECONOMY

Depriving international students of a feasible pathway to post-graduation work will strongly discourage international student enrollment at Columbia, and at institutions of higher education across the nation. The national impacts of these benefits cannot be overstated: a recent NAFSA study found that international students at U.S. colleges and universities contributed $43 billion to the U.S. economy and supported more than 355,000 jobs during a recent academic year (2024-25).

Across Columbia's schools, hundreds of employers have hired international graduates through OPT and STEM OPT. In 2025 alone, 116 employers hired international Columbia Business School graduates for U.S.-based roles, predominantly in the financial services, consulting, and technology sectors. These proposed fees threaten to make this pathway prohibitively expensive, harming the employers and industries that benefit from Columbia University talent. Indeed, Columbia leadership met with a senior leader at a multinational finance company to discuss potential employer responses to the proposed fees. He indicated that employers are unlikely to absorb the fee and would instead direct international graduates to positions overseas. The proposed rule thus risks pushing talented graduates and their skills abroad, creating a global talent pipeline for U.S. competitors and depriving the U.S., particularly startups and small businesses, of a deeper pool of talent from which to build and grow their businesses.

III. THE PROPOSED RULES ARE PUNITIVE TOWARDS ALL INSTITUTIONS REGARDLESS OF THE STRENGTH OF THEIR COMPLIANCE PROGRAMS

The proposed rule does not recognize the rigorous compliance procedures in place at Columbia and other institutions. Partnerships with employers are based on the employer's talent needs, supporting both domestic and international graduates, and each individual OPT case is subjected to multiple stages of review and verification. DHS should consider whether its stated objective of combating fraud could be achieved through a substantially lower fee. For comparison, the H-1B program's fraud prevention and detection fee is $500. Moreover, if revenue generated by the proposed OPT fee is directed to the Treasury's general fund rather than retained by DHS for program oversight and fraud prevention, it is unclear how the fee would directly address the fraud concerns DHS has identified.

Columbia's compliance procedures ensure that individual OPT applications have a multi-layered review. For example, Columbia Law School, has a long-standing history of working with leading legal employers across the private, public, nonprofit, and judicial sectors. These longstanding relationships provide a foundation for evaluating the legitimacy of employment opportunities including those pursued by international students seeking post-completion OPT. Career advisers assess employers through established relationships, prior recruiting and hiring activity, direct communications with employer representatives, and familiarity with the nature and professional expectations of legal work. When students pursue opportunities with employers outside the school's established network, advisers conduct additional due diligence to assess the legitimacy of the organization and the position being offered. Where appropriate, advisers communicate directly with the employer to clarify the position, anticipated responsibilities, and other relevant employment details.

Additionally, across all of Columbia's schools, once a partnership is established at the school level, Designated School Officials (DSO) within Columbia's International Students and Scholars Office (ISSO) conduct due diligence as part of their OPT reporting process, reviewing OPT and STEM OPT submissions and following up with schools and students when additional information is needed. Students must submit an explanation for each employer attesting that their work relates to their academic major and describing how their job responsibilities connect to their field of study. For STEM OPT, the review is even more extensive and includes examination of Form I-983, employer eligibility, and periodic reporting requirements. These procedures operate within the regulatory framework governing practical training. DSOs must update students' SEVIS records to reflect reported changes during authorized practical training, and DSOs ensure that students understand their responsibilities for maintaining status while on OPT.

IV. THE PROPOSED FEES WOULD CREATE BARRIERS TO EQUITABLE ACCESS TO OPT

The proposed rule underestimates OPT participation among Columbia University international graduates, which far exceeds DHS's estimated participation rate of 20%. Therefore, DHS underestimates the resulting financial impact of the proposed fees. Columbia, like many institutions, would not be able to absorb costs of this magnitude. The burden would thus shift to employers or students with disproportionate effects.

First, the fees would disproportionately burden fields in which OPT participation rates are the highest. These fields are those in which practical experience in real-world settings augments education and professional development. Restricting access to OPT disproportionately diminishes the educational impact of some professional trainings.

Few employers, but particularly small businesses, public interest groups, nonprofits, and startups, have the resources to pay fees of this magnitude. These employers will be unable to attract talented international graduates. Students would be incentivized to pursue positions with larger, wealthier employers that are better positioned to absorb the proposed fees, rather than choosing opportunities based on the relevance of the work to their academic training or career goals.

If universities and employers are unable to pay, the financial burden would shift to students, making OPT inaccessible to otherwise qualified graduates, particularly those with limited financial resources. For students pursuing public interest, social impact, or entrepreneurial positions, starting salaries are often only slightly higher than the proposed fee.

Ultimately, the proposed fee structure risks creating inequity in the system by making access to practical training dependent not on a student's merit or qualifications, but on the financial resources of the student or prospective employer.

V. DHS DOES NOT ACCOUNT FOR THE PRACTICAL DEMANDS OF IMPLEMENTATION OR THE OPERATIONAL CHALLENGES OF PAYING THE FEE

The proposed rule underestimates the practical demands of implementation, estimating that school staff will require only 65 hours to adapt to the new requirements. Columbia's ISSO manages more than 3,500 OPT applications and 2,800 OPT extensions annually. Implementing this rule would require dozens of hours of implementation work and back-and-forth with individual students and school partners. ISSO would need to update all OPT e-forms and coordinate with schools and University finance colleagues to establish new processes for fee collection, payment verification, and authorization

The scale of this undertaking can be estimated by a previous USCIS payment mechanism change in 2025. This transition required more than 20 hours of pre-implementation meetings between ISSO and finance colleagues, followed by dozens of hours of school-specific trainings, student town halls, and additional work to establish procedures for verifying users and authorizing payments. Given the volume of OPT applications, administering these fees would create a substantial, ongoing burden requiring new processes across Columbia's schools, ISSO, and finance teams, far exceeding the proposal's 65-hour estimate. In addition, operational questions remain unresolved, including how students would pay fees that exceed credit card limits, who would be responsible for approving and verifying payments, and how processes would be integrated into existing systems, all of which have implications for ongoing compliance with the program.

VI. CONCLUSION

For the above reasons, Columbia University respectfully urges DHS to withdraw the proposed rule. The extraordinary fees outlined in this proposal would impose substantial financial and administrative burdens on Columbia and similar institutions of higher education and would effectively push valuable professional training and apprenticeship opportunities beyond the reach of most international students, to the detriment of the nation's economy and our global competitiveness. This proposed fee increase would severely inhibit the ability of U.S. employers to recruit and retain the highly skilled talent that is helping drive forward critical U.S. industries and risks driving talented graduates overseas to competitors, to the detriment of U.S. businesses.

Columbia recognizes the importance of maintaining the integrity of the OPT program and supports appropriate oversight and accountability. However, this proposed fee increase does not achieve this goal. Rather, it has the practical effect of undermining programs that have operated for decades and have demonstrably contributed to the advancement of our nation's economy.

Columbia supports its international students and is committed to preserving their ability to study, train, and contribute here, recognizing that their loss would diminish our University's academic excellence and global leadership. We therefore respectfully request that DHS reconsider its approach and withdraw the proposed fee increases. The long-term benefits to society of our international students are at risk.

Respectfully submitted,



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