



NACUA

Webinar

# Immigration Update: Navigating Current and Emerging Developments in Higher Education

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# Agenda

- Introduction
- Undocumented students and DACA recipients
- International students and faculty
- Audience Q&A
- Immigration enforcement on campus & FERPA
- Considerations for the future
- Audience Q&A and Closing Remarks



# Undocumented Students and DACA Recipients

# Deferred Action for Childhood Arrivals (DACA)

- Enacted by President Obama in 2012 via Executive Order
  - Undocumented young people who came to the U.S. before age 16
  - Resided in U.S. continuously since 2007
  - In school, graduated from HS, obtained a GED certificate, or honorably discharged from the military
- Some criminal history bars - including felony, "significant misdemeanor," and 3 or more misdemeanors
- Subject to years of litigation. No new approvals of initial applications since 2021.

# DACA Litigation & Current Status

- *Texas v. United States*
- Latest decision: 5th Circuit
- Currently back with S.D. Texas – Judge Hanen
- USCIS still renewing previously approved applications
- New applications being accepted but not adjudicated, ***outside Texas***, as per 5th circuit decision.
- Trump Administration can get rid of DACA, as long as APA followed, as per Supreme Court.
- Program historically has enjoyed bipartisan popularity, both in Congress and nationally.

# Dreamer Scholarships

- Federal investigations into 5 universities over scholarship exclusively for DACA or undocumented students
- Federal government's arguments: discrimination against US citizens, Title VI (national origin)
- BUT Title VI does not mention immigration status
- National origin ≠ immigration status
- **No preemptive compliance**

# In-State Tuition Executive Orders

February 19: EO directing federal agencies to identify and eliminate uses of taxpayer money that “supports illegal immigration.”

April 28: Explicitly targeted the federal law that allows states to provide in-state tuition to undocumented students.

# Attacks on In-State Tuition for Undocumented Students

- **Florida:** repealed in-state tuition rates for undocumented residents in Feb 2025 via legislation
- **Texas:** first state to pass in-state tuition law in 2001
  - Now eliminated via coordinated effort between DOJ & State of Texas
  - Intervention motion appeals pending at 5th Circuit
- **Oklahoma & Kentucky:** Coordinated efforts led to court orders eliminating access. Intervention motion pending in Kentucky.
- Pending challenges: **Minnesota, Illinois**
- DOJ's arguments: discrimination against U.S. citizens from other states, runs afoul of Immigration Reform & Immigrant Responsibility Act (IRAIRA), 8 USC 1623

# Federal Laws Impacting Dreamers

## 8 U.S.C. § 1623

A [noncitizen] who is not lawfully present in the United States shall not be eligible for any postsecondary education benefit unless a citizen or national of the United States is eligible for such a benefit in no less an amount, duration, and scope...”

**No preemptive compliance**

# Federal Laws Impacting Dreamers

## 8 U.S.C. § 1621(d)

This law governs state and local public benefits, including financial aid and in-state tuition.

“A state may provide that a [noncitizen] who is not lawfully present is eligible for any State or local public benefit... only through the enactment of a State law.”

**Federal law sets boundaries, not a complete ban.**

# Undocumented Students: Admission

- There is no federal law prohibiting an institution from enrolling any undocumented person.
- Admission of undocumented immigrant students to public postsecondary educational institutions is not one of the benefits regulated by IIRIRA and is not a public benefit under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).
- States that prohibit admission/enrollment in some form:
  - Alabama
  - Georgia
  - South Carolina

# Work Visa Pathways

- **Non-immigrant** (temporary) visas
  - Many types
  - Dual intent = temporary nonimmigrant visa with an intent to apply for lawful permanent residence (H-1B and L-1)
  - Most common: H-1B (for specialty occupations)
    - Higher ed institutions are exempt from annual cap/lottery
  - Other visa types: L-1, O-1, R-1, TN , E-2
- **Immigrant** visas (green card)
  - PERM process
  - Filed with Department of Labor
  - Longer process

# Work Visa Pathways

- On June 18, 2024, the Biden administration announced plans to streamline access to non-immigrant employment-based visas for U.S. college and university graduates, including DACA recipients and other Dreamers, by making the D3 waiver process more accessible.
- On July 15, 2024, the Department of State issued updated policy guidance for consular officers, which is still in effect.
- Several formerly-DACA higher ed employees and alumni have successfully transitioned to work visas, including H-1B and O-1.

# Work Visa Pathways: How Campuses Can Engage

- Important opportunity for higher ed institutions
  - Not subject to H-1B cap/lottery
- Implement written affiliation agreements with collaborating nonprofits
- Share existing resources & information about work visa pathways
- Make appropriate referrals to legal consultations for interested employees & prospective hires
- Expand policy of work visa sponsorship to all eligible employees regardless of title/position



# International Students and Faculty

# SEVIS Terminations

- Most March/April SEVIS terminations and visa revocations have been fixed, but DOS is giving students previously revoked or terminated a hard time getting new visas.
- Institutional lawsuits pending
  - *AAUP v. Rubio* (D. Mass) – challenging "ideological deportation" policy
    - Trial concluded, awaiting decision
  - *Presidents' Alliance v. Noem* (D. Mass)– challenging DHS's visa revocation & SEVIS termination practice

# Presidents' Alliance v. Noem

- Initial complaint filed April 25, 2025
- Amended complaint filed June 27, 2025 (after previously terminated SEVIS records were restored)
  - Expanded to include DOS
- Oral argument set for Oct 9
- Relief requested
  - Hold unlawful and set aside the policy under which the mass visa revocations were carried out, and enjoin the government from using this practice again;
  - Order the government to stop sending false and coercive emails to international students; and
  - Hold unlawful and set aside the policy that purports to permit the termination of SEVIS records based solely on visa revocation.

# Student Developments

- Proposed rule to terminate Duration of Status and admit students and exchange visitors to a date certain published in Federal Register this morning, [90 FR 42070 \(August 28, 2025\)](#) . Comments end 9/29.
- Change of status, new visas focusing heavily on immigrant intent (Sec. 214b).
- Social media vetting: taking about two weeks or so.
- No huge surge in DS 5525 (extreme vetting).
- Ethical/practical question for attorneys: encourage visa applicants to delete or sanitize social media accounts?

# Proposed Rule Abolished D/S for F and J

- Would return F and J entrants to date certain admission, not to exceed four years. [90 FR 42070](#) ([August 28, 2025](#)).
- Stays beyond four years would require EOS application or new visa abroad; study may continue until CIS decision.
- DSO must recommend EOS in US, application on I 539.
- ESL students limited to 2 years.
- No change of major during first year (undergrads).
- No change of program at all for grad students.
- No parallel or "retrograde" degree programs permitted.
- Comment period ends 9/29/25.
- Takeaways: increases institutional liability (more DSO/RO touchpoints); EOS subject to USCIS discretion; more likelihood of ULP, violations of status; hassle, increased expense for students.

# Social Media Analysis: Visa Applicants

- DOS announcement 6/18/25:

"Under new guidance, we will conduct a comprehensive and thorough vetting, including online presence, of all student and exchange visitor applicants in the F, M, and J nonimmigrant classifications.

To facilitate this vetting, all applicants for F, M, and J nonimmigrant visas will be instructed to adjust the privacy settings on all of their social media profiles to 'public.'"

- Not clear what exactly would provoke visa denial; "national security", "public safety" are the rationale.
- Likely anything negative about the US or the President; definitely pro-Palestinian/anti-Israel posts are a no-go.
- Takeaways: no significant delays being experienced; not clear if AI used, but that would be a good guess given the volume; one more factor discouraging students from coming to US.
- Should attorneys encourage students to "wipe" social media?

# Faculty/Staff Developments

- Suspension of visa issuance to nationals of certain countries
- Visa applicants (J-1 and others) may see increased government scrutiny of their political speech and social media activity
- Proposed legislation affecting F-1 OPT and H-1B cap exemption (discussed later)
- Proposed change to H-1B lottery selection process to prioritize higher salaries and, potentially, higher education levels
- Agency rulemaking agendas include DHS revising eligibility for H-1B cap exemptions; altering rules for CPT and OPT; and making changes to EB-1A (extraordinary ability) and EB-1B (outstanding professors and researchers) provisions – watch for proposed rules
- Track at <https://www.reginfo.gov/public/do/eAgendaMain>



Questions?



# Immigration Enforcement on Campus

# Immigration Enforcement on Campus

- DHS' Sensitive Locations/Protected Areas policy rescinded on January 20, 2025
- DHS now retains full discretion to conduct enforcement on or near campuses
- Share Know Your Rights information: Rights & Protections Hub on Higher Ed Immigration Portal
- Presidents' Alliance FAQ: Immigration Enforcement on Campuses (updated June 2025)

# Institutional Protocols

- Develop & update protocols for responding to DHS presence
  - Designate a first point of contact
  - Develop script for front line staff
  - Verify credentials: request officer ID & any warrants/subpoenas
  - Documentation: log the encounter, make copies of any documents
- No federal requirement to assist with immigration enforcement actions
- Check local & state laws (may impose additional duties or restrictions)
- Ensure protocols are communicated to campus police, security, and administrators

# Public vs. Nonpublic Spaces

- Fourth Amendment establishes the "reasonable expectation of privacy" standard
- Public spaces: open and accessible without restriction
- Nonpublic spaces: access is restricted (ID required, locked doors, monitored entry, etc.)
  - Clearly designate & mark with signage
  - **Entry requires consent of authorized official or a valid judicial warrant**
  - Includes private residences (dorms, off campus housing, etc.)

# Warrants & Legal Authority

- Only a valid **judicial warrant** authorizes entry or search/seizure of property in nonpublic space
  - Signed by a federal judge or magistrate, *not* an immigration judge
  - Must be supported by probable cause
- Administrative warrants ***do not*** authorize entry into nonpublic spaces without consent
  - Issued by DHS (ICE/CBP), e.g., Form I-200/I-205
- Search vs. Arrest warrant
  - Know the scopes & limits of each
  - Arrest warrant: limited to locations where the subject is believed to reside and is present at the time (*Payton v. New York*, 445 U.S. 573 (1980))
  - Search warrant: scope strictly limited to place and items listed in the warrant
- Resource: NILC's Warrants and Subpoenas: What to Look Out for and How to Respond

# JUDICIAL WARRANTS v. IMMIGRATION WARRANTS

AD-15 (Rev. 12/09) Search and Seizure Warrant

**UNITED STATES DISTRICT COURT**

for the  
Eastern District of California

In the Matter of the Search of  
*(briefly describe the property to be searched  
or identify the person by name and address)*

██████████  
Davis, California 95616

Case No. \_\_\_\_\_

**SEARCH AND SEIZURE WARRANT**

To: Any authorized law enforcement officer **211-SW-0161 EFB**

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the EASTERN District of CALIFORNIA.  
*(Identify the person or describe the property to be searched and give its location.)*  
SEE ATTACHMENT A, ATTACHED HERETO AND INCORPORATED BY REFERENCE

The person or property to be searched, described above, is believed to conceal *(briefly describe the person or describe the property to be seized)*  
SEE ATTACHMENT B, ATTACHED HERETO AND INCORPORATED BY REFERENCE

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property.

**YOU ARE COMMANDED** to execute this warrant on or before 5-9-2011  
*(not to exceed 14 days)*

in the daytime 6:00 a.m. to 10 p.m.  at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to United States Magistrate Judge \_\_\_\_\_  
*(name)*

I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)*  for \_\_\_\_\_ days *(not to exceed 30)*  
 until, the facts justifying, the later specific date of \_\_\_\_\_

Date and time issued: 4-25-2011  
9:10:00 AM

City and state: SACRAMENTO, CALIFORNIA

Edmund F. Brennan  
EDMUND F. BRENNAN, U.S. MAGISTRATE JUDGE  
*(Print name and title)*

Is this the right address?

Is it still current?

Note: only the person, property, & areas specified may be searched

Is it actually signed by a judge?

**IF THE ANSWER TO ALL OF THESE IS YES, THEN IT IS LIKELY A VALID JUDICIAL WARRANT**

**DEPARTMENT OF HOMELAND SECURITY**  
**U.S. Immigration and Customs Enforcement**  
**WARRANT OF REMOVAL/DEPORTATION**

File No: \_\_\_\_\_  
Date: \_\_\_\_\_

To any immigration officer of the United States Department of Homeland Security:

\_\_\_\_\_  
*(Full name of alien)*

who entered the United States at \_\_\_\_\_ on \_\_\_\_\_  
*(Place of entry) (Date of entry)*

subject to removal/deportation from the United States based upon a final order by:

an immigration judge in exclusion, deportation, or removal proceedings  
 a designated official  
 the Board of Immigration Appeals  
 a United States District or Magistrate Court Judge

and pursuant to the following provisions of the Immigration and Nationality Act:

I, the undersigned officer of the United States, by virtue of the power and authority vested in the Secretary of Homeland Security under the laws of the United States and by his or her direction, command you to take into custody and remove from the United States the above-named alien, pursuant to law, at the expense of:

\_\_\_\_\_  
*(Signature of immigration officer)*

\_\_\_\_\_  
*(Title of immigration officer)*

**THESE ARE VISUAL CUES THAT THIS IS AN IMMIGRATION WARRANT**



# Designate Points of Contact

- Consider campus police as first point of contact for DHS officers
- Train campus policy/security to:
  - Refer DHS officers to Office of General Counsel
  - Distinguish between administrative and judicial warrants
  - Encourage centralized reporting of all DHS encounters
- International students should always keep the following documents with them:
  - Passport and visa (or I-797 approval notice) to show proof of identity and immigration status
  - Unexpired I-20
  - I-94 arrival/departure record
  - Student ID
  - Emergency contacts, including the Designated School Official (DSO)

# FERPA Student Privacy Protections

- Family Education Rights & Privacy Act (FERPA) prohibits schools from disclosing personally identifiable info from a student's education records without the student's or parent's written consent.
  - Applies to all students, regardless of citizenship or immigration status (there are exceptions for international students).
- Exception: per lawfully-issued *judicial* subpoena
- Directory information (student name, major, etc.) is a narrower category that FERPA allows schools to define and release (if the student has not opted out) but still subject to institutional policy
- See Guidance for Higher Education on Immigrant Student Privacy and FERPA on Higher Ed Immigration Portal

# FERPA Exceptions: Judicial vs. Administrative Subpoenas

- Judicial subpoenas
  - Issued by federal or state court, signed by a judge or clerk (*not* an immigration judge)
  - Must be valid under both state and federal law
  - May be subject to challenge (e.g., overbreadth, improper purpose, undue burden)
- Administrative subpoenas
  - Issued by DHS
  - Do not automatically trigger a FERPA exception unless accompanied by federal court order

# JUDICIAL SUBPOENAS v. IMMIGRATION SUBPOENAS

AO 88B (Rev. 03-14) Subpoena to Produce Documents, Information, or Objects, or to Permit Inspection of Premises in a Civil Action

**UNITED STATES DISTRICT COURT**

for the \_\_\_\_\_

Plaintiff \_\_\_\_\_ )  
v. \_\_\_\_\_ ) Civil Action No. \_\_\_\_\_  
Defendant \_\_\_\_\_ )

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: \_\_\_\_\_  
(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place: \_\_\_\_\_ Date and Time: \_\_\_\_\_

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: \_\_\_\_\_ Date and Time: \_\_\_\_\_

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT OR \_\_\_\_\_  
Signature of Clerk or Deputy Clerk Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) \_\_\_\_\_, who issues or requests this subpoena, are: \_\_\_\_\_

person who issues or requests this subpoena of documents, electronically stored information, or tangible things or the and a copy of the subpoena must be served on each party in this case before stated. Fed. R. Civ. P. 45(a)(4).

Is this directed to you?

Does it specify what documents are being sought?

Is it signed by a clerk of court?

IF THE ANSWER TO THESE IS YES, THEN IT IS LIKELY A VALID JUDICIAL SUBPOENA

1. To (Name, Address, City, State, Zip Code) **DEPARTMENT OF HOMELAND SECURITY**  
**IMMIGRATION ENFORCEMENT SUBPOENA**  
to Appear and/or Produce Records  
8 U.S.C. § 1225(d), 8 C.F.R. § 287.4

Manager: \_\_\_\_\_  
\_\_\_\_\_@cbaldo.org  
Oakland, California 94601

Subpoena Number USCIS-899-17-115

2. In Reference To  
Immigration filing on behalf of \_\_\_\_\_ (Title of Proceeding) \_\_\_\_\_ (File Number, if Applicable)

By the service of this subpoena upon you, YOU ARE HEREBY SUMMONED AND REQUIRED TO:

(A)  APPEAR before the U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), or U.S. Citizenship and Immigration Services (USCIS) Official named in Block 3 at the place, date, and time specified, to testify and give information relating to the matter indicated in Block 2.

(B)  PRODUCE the records (books, papers, or other documents) indicated in Block 4, to the CBP, ICE, or USCIS Official named in Block 3 at the place, date, and time specified.

Your testimony and/or production of the indicated records is required in connection with an investigation or inquiry relating to the enforcement of U.S. immigration laws. Failure to comply with this subpoena may subject you to an order of contempt by a federal District Court, as provided by 8 U.S.C. § 1225(d)(4)(B).

3. (A) CBP, ICE or USCIS Official before whom you are required to appear  
Name \_\_\_\_\_  
Title Immigration Officer  
Address USCIS 430 Sansome Street, Rm. 1220 San Francisco, California 94111  
Telephone Number 415-248-8619

(B) Date 04/28/2017

(C) Time 0900  a.m.  p.m.

4. Records required to be produced for inspection  
Please provide a copy of the lease for \_\_\_\_\_ Street, # \_\_\_\_\_ in Oakland, California. The lease should include the names of the current occupants. If there are no current occupants, please provide a copy of the lease for the previous occupants.

5. Authorized Official  
\_\_\_\_\_  
(Signature)  
\_\_\_\_\_  
(Printed Name)  
Supervisory Immigration Officer  
(Title)  
04/18/2017  
(Date)



If you have any questions regarding this subpoena, contact the CBP, ICE, or USCIS Official identified in Block 3.

DHS Form I-138 (6/09)

THESE ARE VISUAL CUES THAT THIS IS AN IMMIGRATION SUBPOENA



# FERPA Exceptions for F and J Students

- International students are protected by FERPA, except for the data elements enumerated here: **8 CFR 214.3(g), 214.1(h)**. This information must be provided to ICE/SEVP (not other agencies) within three days of request.
- Importantly FERPA still protects some information, such as class schedule, extracurricular activities, friends and acquaintances and generally any other info that might reveal the student's real-time location.
- Disciplinary records are not enumerated; this is currently under litigation. The Dept of Ed contends they are, but does not acknowledge that international students are subject to clear FERPA exceptions and the same do not apply to domestic students.
- FERPA still applies even if the student is out of status or in removal proceedings, and generally until the student dies or until records are destroyed.
- Records must be maintained for three years from date student leaves.
- **STUDENTS WITH NO RECORD IN SEVIS ARE FULLY PROTECTED BY FERPA, e.g., UNDOCUMENTED STUDENTS.**
- [Disclosing Student Disciplinary Records: Understanding FERPA Guidelines](#)



# Considerations for the Future

# New Developments for International Faculty: H-1B Specialty Occupation

- Broader definition of “specialty occupation” effective 01/17/25
- To qualify as a specialty occupation, the position normally requires a bachelor's degree in a *specific field of study*
- DHS clarified that “normally” does not mean “always”
- DHS clarified that a range of degree fields may be acceptable provided that they are “directly related” to the duties of the H-1B position
- 89 FR 103054 (December 18, 2024)

# New Developments for International Faculty: H-1B Cap Exemption

- The “Colleges for the American People” (CAP) Act would end the long-standing H-1B visa cap exemption for U.S. colleges and universities, pushing hires to J, O and TN.
- H.R. 4743 introduced on 07/23/2025 by Reps. Tom Tiffany and Andrew Clyde
- S 2567 introduced 07/31/2025 by Sen. Tom Cotton
- If enacted, foreign faculty hires would be required to compete under the standard cap of 65,000 H-1B visas
- Separately, a proposed rule would prioritize higher salaries in the selection process for H-1B positions.

# "Restriction on Entry of Certain Nonimmigrant Workers"

- EO/PP of September 19, effective midnight September 21.
- Restricts entry or visa issuance of all H-1B workers outside US as of effective date, until employer pays \$100K fee **per worker**.
- **No exclusion for higher education.**
- Forbids approval of any new H-1B petition without attached \$100K fee. Not clear if extensions are excepted for workers in US.
- Waiver in national interest available; exact criteria unknown.
- Action Decision Memorandum- HQ Other of Sept 20 provides that rule does not apply retroactively, leaving current visa and petition holders unaffected. Only petitions not yet filed must include the \$100K fee. CBP issued a parallel memo same day. Unfortunately, the memo does not resolve visa issuance/renewal. DOS 9/21: *The Proclamation's restrictions on visa issuance and entry apply only to aliens seeking visa issuance or entry into the United States based on H-1B petitions filed with USCIS after the Proclamation's effective date of September 21, 2025, at 12:01 a.m. Eastern Daylight Time (EDT).*
- Also directs agencies to come up with across-the-board H-1B fee rule, as well as rule prioritizing lottery by wages/degree.
- Expires September 21, 2026, unless agencies determine otherwise.
- <https://www.whitehouse.gov/presidential-actions/2025/09/restriction-on-entry-of-certain-nonimmigrant-workers/>
- Wild rumors about modifications/interpretations of PP: excluding universities, 100K one time or per annum, per employer or employee?
- Takeaways: focuses on one of four major immigrant streams; styled as exclusion order rather than fee increase (would require reg); tech bro's now officially "out"; "H1B dependent" employers already under many restrictions.

# New Developments for International Faculty: Optional Practical Training (OPT)

- The “Fairness for High-Skilled Americans Act” would terminate the Optional Practical Training (OPT) program
- H.R. 2315 introduced on 03/25/2025 by Rep. Paul Gosar
- Three years ago, the D.C. Circuit upheld F-1 OPT as a valid exercise of DHS authority under the INA
- DHS may set the time and conditions of a non-immigrant’s stay in ways that “reasonably relate” to the visa they used to enter the U.S.
- *Washington All. of Tech. Workers v. DHS*, 50 F.4th 164 (D.C. Cir. 2022).

# New Developments for International Faculty: Administration

- USCIS issuing Requests for Evidence (RFEs) for residential addresses in H-1B and employment-based green card cases to collect biometric data
- U.S. consulates issuing H-1B visa stamps valid for only one year even though the I-129 has been approved for three years. Reciprocity?
- In some cases, DHS appears to be eliminating the 60-day grace period to remain in the U.S. after expiration of the I-129 validity period, issuing a Notice to Appear in immigration court, if person has minor criminal offenses, any prior lapse in status.

# New Developments for International Faculty: Administration

- O-1s, TNs, and H-1Bs may face more beneficiary review, including background investigations examining social media and using posts/activities as discretionary grounds for denial
- Use of AI and more expansive investigative work to evaluate all visa holders in the U.S. is foreseeable. Visa holders may have their visa stamps “automatically terminated” on the basis that they have violated their status.
- At U.S. Consulates, increased use of Administrative Processing resulting in missed employment start dates. Increased use of PEOs to bridge the gap? Export control considerations.
- Further reductions in State Department workforce and more workload due to increased vetting, making visa appointments harder to schedule and denials more likely

# Admissions Cycle

- NYT Report: Princeton up, Columbia steady.
- Harvard up!
- Times of India, AP reporting as much as 40% decline.

# Main Sources of Concern Going Forward

- Elimination of D/S
- Elimination of OPT/STEM
- NIL guidance (not addressed here)
- H-1B Changes
- Drop in enrollments
- Increased DOS/USCIS discretion, perhaps unreviewable
- DACA
- Immigration enforcement on campus



Questions?

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