



September 29, 2025

The Honorable Kristi Noem
Department of Homeland Security
Washington, D.C. 20528

Re: American Society of Landscape Architects' Opposition to "Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students" [Docket No. ICEB-2025-0001].

Dear Secretary Noem:

On behalf of the 16,000 members of the American Society of Landscape Architects (ASLA), I am writing to express opposition to the proposed rule titled "Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students" [Docket No. ICEB-2025-0001], published in the Federal Register on August 28, 2025. This proposed rule is not a reasonable approach for university degree programs that require more than four years to complete and would create an administrative burden on universities, students, businesses, and the federal government.

Under the proposed rule, the U.S. Department of Homeland Security (DHS) is seeking to change the admission period for the F (academic student), J (exchange visitor), and most I (representatives of foreign information media) visa classifications from "duration of status" (i.e., the period of time that they are complying with the terms and conditions of their nonimmigrant classification) to a fixed time period. Specifically, DHS is recommending that student visas be limited to four years and require an application for an extension for any period exceeding the four years. This four-year limitation also applies to those admitted under the optional practical training (OPT) and STEM OPT programs.

Many accredited universities offer five-year undergraduate programs, particularly in fields such as landscape architecture, architecture, and engineering. These programs are intentionally designed to provide rigorous academic training alongside practical experience to prepare students to become licensed design professionals protecting the public's health, safety, and welfare. Accordingly, the programs often exceed the traditional four-year timeline. In fact, at least a dozen U.S. landscape architecture university programs require 4.5–5 years of academic study. Under the proposed rule, students enrolled in these programs would be forced to apply for extensions midway through their studies, introducing unnecessary administrative hurdles and uncertainty in the academic journey.



American landscape architecture university programs are some of the finest in the world, attracting the best and brightest talent from across the nation and around the globe. Among the most attractive aspects of studying in the U.S. are the OPT and STEM OPT programs, which grant graduates temporary stay in the country to enhance their education and contribute to the U.S. economy. This rule would also impact the effectiveness of these programs, which are not only vital for students but also for U.S. employers who rely on this talent to fill high-demand roles. The proposed fixed admission period would force students and potential American employers to navigate a burdensome and uncertain extension process that may not align with the timelines of their employment or training. U.S. employers—especially in design-build, high-tech, and research-driven industries—rely on STEM OPT to recruit and retain global talent. The rule could deter international students from choosing U.S. institutions, weakening our country’s leadership in innovation and higher education.

Under the current “duration of status” framework, universities are able to manage student records and compliance with relative efficiency. For universities, the proposal would create extensive new responsibilities. School officials would need to counsel students on extension procedures, prepare additional documentation, and respond to increased inquiries and appeals. These tasks would require additional staffing and funding—resources that many institutions, especially public and smaller colleges, simply do not have. Increased extension requests would also require demanding review, documentation, and adjudication by DHS officers. This would strain agency resources and divert attention from higher-priority tasks.

While I understand the need to streamline some visa programs, this proposal instead would create many undue burdens on universities, students, American businesses, and the federal government. I urge you to reconsider this proposed rule and not place fixed time requirements on certain student visas.

Sincerely,

Torey Carter-Conneen, Hon. ASLA
Chief Executive Officer
American Society of Landscape Architects