IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PRESIDENTS' ALLIANCE ON HIGHER EDUCATION AND IMMIGRATION, *et al.,*

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND SECURITY, *et al.*,

Defendants.

Case No. _____

DECLARATION OF GRINNELL COLLEGE

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I, Anne F. Harris declare as follows:

1. I am the President at Grinnell College. As President, I have personal knowledge of the contents of this declaration and/or have knowledge of the matter based on records available to me. If called as a witness, I could and would testify competently to the following facts.

2. Grinnell is a small, private liberal arts college in Grinnell, Iowa with an undergraduate student population of approximately 1,700.

3. Grinnell is a member institution of the Presidents' Alliance on Higher Education and Immigration, represented by me in my role as President. Grinnell pays annual dues to the Presidents' Alliance on Higher Education and Immigration.

4. I am familiar with the Department of Homeland Security's rulemaking *Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media* (the "Final Rule"). I understand that, among other things, the Final Rule eliminates the "duration of status" admission period for F and J nonimmigrants and replaces it with admission for a fixed period based on their length of program, not to exceed 4 years absent an extension approved by immigration officials.

5. The announcement of the Final Rule, and DHS's earlier proposal of that rule, has raised significant concerns among current and prospective international students and scholars at Grinnell, as well as administrators, faculty, and staff. The Final Rule has already inflicted serious, irreparable harm on Grinnell and will continue to do so if it remains in effect.

A. Harms to international student recruitment and retention.

6. Since the publication of the Final Rule, Grinnell College has received feedback

from current and prospective international students and scholars that the elimination of duration of status and other changes from the Final Rule stand as strong deterrents to studying in the United States, including at Grinnell College.

7. Grinnell College occupies a distinctive position in higher education as a globally engaged institution. Global education, internationalism, and support for international students are central to its mission. International students account for approximately 20% of each incoming class, and, unlike many institutions, Grinnell offers equal financial aid to international students as one demonstration of its commitment to international education. "Global Grinnell" is central to Grinnell's ethos as an institution, as well as its reputation.

8. Since the announcement of the proposed rule change in 2025, the College has experienced a shift in our ability to attract international student enrollment. A continued shift in demand threatens to erode our brand strength and ability to act on our mission.

9. Grinnell's yield on offers of admission (admitted students choosing to enroll at Grinnell) has fallen markedly among international students, from 42.2% in Fall 2023 to lows in 2025 (24.15%) and 2026 (26.24%). And Grinnell's selectivity of international applicants, as measured by admit rate, has decreased from 4.4% in 2023 to 5.3% in 2026. Grinnell continues to experience significant enrollment reductions in specific international markets between 2023 and 2026. For example, enrollment of students from India has decreased 87.5%.

10. In keeping with its commitment to global education, Grinnell has aimed for international students to make up 20% of each incoming class. From 2021-2024, the incoming classes at Grinnell averaged 91 international students, accounting for an average of 20% of each incoming class. In 2025, international enrollment fell to 71 students, or only 17% of the class. The incoming class of 2026 is projected to be 18% international.

11. These harms to international student enrollment strike at the heart of Grinnell's educational mission, particularly given Grinnell's core commitment to global education. Grinnell is irreparably harmed by any prospective international student who declines the opportunity to study at the College because of the Final Rule. Grinnell is unlikely to recover the opportunity to integrate that individual student into the fabric of our academic community. This circumstance also harms Grinnell's reputation as a global institution, undermining a core aspect of Grinnell's identity and its appeal to prospective students and faculty—both international and domestic.

Grinnell is also harmed financially by a decline in student enrollment. Grinnell's financial model is supported by net student revenue, and international students provide approximately 26% of the annual student tuition revenue realized at Grinnell College—approximately $10 million. Any decline in international student enrollment at Grinnell due to the Final Rule will place undue financial strain on the College's operations. At the same time, as an institution that meets 100% of demonstrated need, and enrolls international students with significant financial need, Grinnell anticipates incurring at least $50,000 in additional annual costs to support the I-539 processing fee. Further, as a rural institution, Grinnell will incur expense to provide transportation for students needing biometric appointments in larger cities where they are available.

B. Harms to academic & student wellbeing

12. The new rule will directly impact international students' access to academic programming at Grinnell, such as dual degree programs and student teaching, by requiring students to submit uncertain extension of stay (EOS) requests part-way through their studies or, in some cases, barring the programs altogether.

13. For example, Grinnell offers a 3/2 engineering program that permits students to spend 3 years at Grinnell pursuing a liberal arts education, followed by 2 years of study in the

engineering program at one of four partner institutions: Columbia University, the California Institute of Technology, Rensselaer Polytechnic Institute, or Washington University. Grinnell offers a similar 2-1-1-1 program with Dartmouth University in which students spend 2 years at Grinnell, one year in Dartmouth's engineering program, an additional year at Grinnell, and one final year at Dartmouth. Students in these programs earn a Bachelor of Arts degree from Grinnell in their fourth year of study and then a Bachelor of Science or Bachelor of Engineering degree at the partner institution. The Final Rule would require international students to file an EOS to effect these transfers, increasing the uncertainty of completing these programs, and may even bar international students from participating in these programs altogether due to the Final Rule's prohibition on enrolling in a program at the same or lower academic level as a program previously completed.

14. Indeed, one Grinnell student has already been told by the host institution that their continued enrollment in in their program is uncertain due to the Final Rule.

15. Another area of concern for international students has been Grinnell's student teaching program. This program often requires 9 semesters of enrollment (*i.e.* 4.5 years rather than 4 years), meaning that under the Final Rule any international student who participates must file an EOS request, making their ability to complete the program uncertain, and thus making the program less appealing to current and prospective international students.

16. The Final Rule also threatens to undermine international student participation in high-impact practices that are core components of the academic program at Grinnell, including off-campus study, internships, and research. In particular, international students are concerned about international travel connected to these opportunities.

17. Finally, many Grinnell College students view attending graduate school as a key outcome from their studies at Grinnell—in 2025, 40% of Grinnell College students reported that

they intended to attend graduate school after graduating. The Final Rule, which will require international students to seek an EOS to attend graduate school, will make a Grinnell education less attractive for the many students hoping to continue their studies in graduate education after completing their program at Grinnell.

18. These harms to Grinnell are irreparable. They undermine Grinnell's academic and educational mission by making many of its programs unattractive or unavailable to a significant segment of Grinnell's student body. What is more, a decline in international student participation means these programs are less enriching for the students who *can* participate, but must do so without the benefit of the company of international students now absent from the educational cohort.

19. On the other hand, if Grinnell attempts to modify programs in response to the Final Rule, this, too, would amount to irreparable harm, as it would require Grinnell to make costly and unwanted changes to its academic program, which will be difficult to unwind in the future.

C. Administrative and financial harms.

20. Since the proposed rule was announced in 2025, the Office of International Student Affairs (OISA), which advises international students and supports immigration-related matters, has experienced a significant shift in workload. Staff time devoted to advising students concerned about the rule's potential impact has diverted attention from OISA's standard responsibilities in support of Grinnell's global student body.

21. Based on the estimated costs to DSOs outlined in the Final Rule, Grinnell estimates that compliance with the Final Rule will require an additional 326.25 staff hours each year, at a cost of $84,401.25 annually.

22. Beyond that, OISA will have to spend significant resources familiarizing and adapting to the Final Rule, including creating new trainings related to the changed requirements so that

students, faculty, and staff understand the provisions of the Final Rule. OISA also anticipates—and has already experienced—an increased advising load, including helping faculty and career services staff understand the Final Rule's limitations on academic mobility and reverse or lateral matriculation.

23. Additionally, the Final Rule requires significant shifts in systems and processes for OISA's Academic/Career Advising Partners, while also creating considerable confusion and uncertainty, with many consequences for the College. To name a few of these harms:

- The complexity of the Final Rule has significantly increased liability risks for our DSO and international advising teams.
- Because the Final Rule makes international travel unattractive for international students, Residence Life will need to prepare for increased demand for housing during break periods, such as winter break, when international students would ordinarily travel.
- The College may be unable to offer program extensions due to course failure, which USCIS may not consider a compelling academic reason to extend a student's studies.
- Graduates who lose their 60-day grace period, and instead have only 30 days, will lose flexibility and time related to next-step decisions (such as awaiting funding details for graduate school or weighing options between graduate school and OPT).

24. Given the increase in student advising related to the proposed rule and the anticipated time needed for compliance, Grinnell College is reorganizing its international student advising office, including creating a new position to help meet the added demand. This is a significant new expense that will be unrecoverable in the future, and it also represents the kind of restructuring change that cannot easily be undone.

25. Grinnell's financial model is supported by net student revenue. International students provide approximately 26% of the annual student tuition revenue realized at Grinnell College, totaling almost $10 M. Any continued suppression of international student enrollment at Grinnell brought on by the proposed rule will place undue financial strain on the College's

operations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 16, 2026 at Grinnell, Iowa._

Anne F. Harris