**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 REED COLLEGE**

# DECLARATION OF REED COLLEGE

I, Karnell McConnell-Black, declare as follows:

1. I am the Vice President for Student Life at Reed College, and I oversee the college's International Student Services. I have held this role since August 1, 2020. The responsibilities of my office include managing the staff of International Student Services, including the Director of International Student Service, Gwen Sandford, who holds the role of Principal Designated School Official (PDSO) and Alternate Responsible Officer (ARO). As director, she provides support services to international students and exchange visitors to aid in the transition to US culture and college life via orientation and year-round support through personal, visa status, academic, and cultural advising and guide international students as they prepare for life after college. Her role is a key part of the College' efforts to retain and support international students.

2. As vice 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.

3. Reed College is a member institution of the the Presidents' Alliance on Higher Education and Immigration, represented by its President, Audrey Bilger. Reed College pays annual dues to the Presidents' Alliance on Higher Education and Immigration and has been affiliated with the Presidents' Alliance since 2018.

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 visa holders and replaces it with admission for a fixed time period based on their length of program, not to exceed 4 years absent an extension approved by immigration officials.

**A. Background**

5. Reed College is a coeducational, independent liberal arts and sciences college. Referred to as one of the most intellectual colleges in the country, Reed is known for its high standards of scholarly practice, creative thinking, and engaged citizenship.

6. Founded in 1908, Reed College is located in Portland, Oregon and serves about 1,300 students and offers 38 bachelor of arts degrees across 26 academic departments. Reed also offers a graduate program resulting in a master of arts degree in liberal studies. Reed College focuses on conference-style teaching with a 9:1 student to teacher ratio. Reed College is an institution of higher education in the liberal arts devoted to the intrinsic value of intellectual pursuit and governed by the highest standards of scholarly practice, critical thought, and creativity. Its undergraduate program of study, leading to the degree of Bachelor of Arts, is demanding and intense and balances breadth of knowledge across the curriculum with depth of knowledge in a particular field of study. The goal of the Reed education is that students learn and demonstrate rigor and independence in their habits of thought, inquiry, and expression.

7. International students and scholars are vital members of the community at Reed College as teachers, researchers, students, and colleagues.

8. Reed College enrolls approximately 114 international students with F-1 status, all enrolled in undergraduate programs. Approximately 85 F-1 students at Reed College are enrolled in STEM disciplines and 29 are enrolled in other disciplines. Additionally,

approximately 25 students per year participate in Optional Practical Training following the completion of their Reed degree program.

9. Without the Final Rule, Reed College would expect to enroll approximately the same number and breakdown of F-1 students in a typical year.

10. F-1 students follow many academic paths at Reed College. For example, while many undergraduates enroll in 4-year degree programs and complete their degrees in four years, many students take more than 4 years to graduate. Indeed, 25 percent of F-1 international undergraduate students take longer than 4 years to earn their bachelor's degree.

11. Approximately 22 J-1 exchange visitors are affiliated with Reed College including 13 students, 1 postdoctoral fellow, 8 visiting professors, and 8 language scholars.

12. Without the Final Rule, Reed College would expect to be affiliated with approximately the same number and breakdown of J-1 exchange visitors in a typical year.

13. All international members of the Reed College community are valued teachers, students, researchers, and colleagues. To describe just a few of the ways F and J visa holders enrich our community: F-1 and J-1 students are an important part of Reed College's academic mission and campus community. Reed's international student population includes more than 140 students from over 45 countries and territories and represents approximately 11 percent of the College's overall student body. F-1 and J-1 students are therefore an important component of the diversity of experiences, perspectives, and intellectual traditions represented at Reed.

14. International students make significant contributions to Reed's distinctive academic environment. Reed's liberal arts curriculum emphasizes small-group,

conference-based learning, close engagement with faculty, critical inquiry, and the exchange of ideas among students. Within this setting, F-1 and J-1 students bring perspectives informed by different educational systems, languages, cultures, histories, and lived experiences. These perspectives enrich classroom discussion and expose all Reed students to viewpoints and approaches that extend beyond the United States, strengthening the cross-cultural and global dimensions of a Reed education. International students also contribute to Reed's culture of undergraduate research and scholarly inquiry.

15. Research is an essential part of the undergraduate experience at Reed, and every student completes an intensive senior thesis under faculty guidance. International students participate fully in this academic model, contributing to research, creative work, laboratory and field-based inquiry, and independent scholarship across the humanities, social sciences, natural sciences, mathematics, and the arts. Their international backgrounds can also expand the range of questions, source materials, languages, geographic perspectives, and intellectual traditions represented in student research.

16. Beyond the classroom, F-1 and J-1 students contribute substantially to campus life and intercultural learning. Reed's International Student Services programs specifically create opportunities for international students to share their perspectives, develop leadership skills, and build community. International students serve as peer mentors and student leaders and participate in programs such as the International Student Club and events like International Cafés and Mesa Mundi. These events provide a community-wide opportunity for students, faculty, and staff to share cultures, backgrounds, and identities. Through these and other activities, international students help create opportunities for intercultural learning that benefit the entire Reed community.

17. International students also strengthen Reed's relationship with the surrounding Portland community. Through programs such as Reed's International Friendship Program, international students develop relationships with local individuals and families and participate in reciprocal cultural exchange. Students also engage with Portland through internships, experiential learning, cultural activities, community relationships, and permitted employment opportunities. These interactions extend the educational and cultural benefits of Reed's international population beyond the campus itself.

18. The enrollment of international students also provides financial benefits to Reed College and the surrounding community. Like other Reed students, international students contribute tuition, fees, and, where applicable, housing and meal-plan revenue. For the 2026–27 academic year, Reed's full-time undergraduate tuition is $73,960, with total published direct costs of $93,170 for a student living on campus with the listed board plan. International students who do not receive institutional grant assistance, as well as students whose families contribute a portion of their educational costs, therefore provide tuition and other operating revenue that supports Reed's educational programs and institutional operations. At the same time, Reed provides substantial need-based institutional assistance to eligible international students and is committed to meeting 100 percent of demonstrated financial need for admitted international students who apply for aid in accordance with Reed College requirements. International students additionally contribute indirectly to the Portland-area economy through expenditures associated with housing, food, transportation, personal needs, entertainment, travel, and other goods and services.

19. More broadly, maintaining a strong F-1 and J-1 student population enhances Reed College's ability to recruit talented students globally, sustain an internationally engaged

academic community, and prepare all Reed students to participate thoughtfully and effectively in an increasingly interconnected world.

20. Reed College devotes significant time and resources to serving our international community members and ensuring their compliance with all applicable immigration laws. Our International Student Services consists of two full-time professionals, additional staff within the College serve as DSOs and AROs, whose job duties consist of assisting international students and reporting required information via SEVIS.

21. As detailed below, the announcement of the Final Rule has raised significant concerns and inflicted serious harm on Reed College and its community of international students and scholars.

**B. Harms to recruitment, enrollment, and retention.**

22. Since the publication of the Final Rule, Reed 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 create a strong disincentive to come to or continue studying in the United States.

23. I am aware of feedback from other prospective students and scholars who have cited concerns about the Final Rule as a major factor weighing in their decision about whether or not to study in the United States in the future.

24. Additionally, I am aware of a trend of declining enrollment of international students and scholars at Reed College driven by anxieties about the policy environment in the United States, and the loss of duration of status is in keeping with and will accelerate that trend.

25. All told, Reed College believes that students' concerns about their ability to

complete their studies absent duration of status is a major deterrent to joining Reed College or any other U.S. institution of higher learning. It is a major influence on enrollment decisions.

26. In my experience, if a student declines to pursue education in the United States and instead chooses to study in another country, that lost enrollment is very unlikely to be recoverable by the college in future years, even if conditions change.

27. Reed College competes in a global marketplace for top academic talent. In my experience, U.S.-based institutions like Reed College are losing ground to institutions in other countries, like Canada, the United Kingdom, and Australia, whose policies are more favorable to international students. The loss of duration of status is in keeping with and will accelerate that trend.

28. Accordingly, the future loss of international students and scholars at Reed College due to the elimination of duration of status is a concrete, immediate, and irreparable harm. Each lost enrollment of an international student and scholar leaves Reed College worse off: we miss out on talented teachers and researchers, we miss valued community members who enrich our academic and social lives as a community of learning, and, in many cases, the university loses tuition dollars that help support our programs.

29. Losing international students and scholars at Reed College will harm the educational environment at Reed and won't allow Reed students to have as culturally rich of an experience on campus. Additionally, the loss of tuition and room and board fees will negatively impact Reed College at a time when the number of college-aged domestic students is already on the decline.

**C. Harms to research and teaching**

30. Many international scholars and students at Reed College make critical contributions to the classroom instruction and research capabilities of the college.

31. Often the research performed at Reed College spans multiple years and its success depends in part on continuity of research staff.

32. The loss in enrollment of international students and scholars we anticipate to result from the elimination of duration of status will have direct negative consequences for many research efforts at Reed College by disrupting the continuity of research teams and draining the college of talented individuals.

33. Additionally, many international students and scholars make important contributions to Reed College through teaching roles, including as visiting professors, lecturers, teaching assistants, research assistants, research and laboratory supervisors, etc.

34. The loss in enrollment of international students and scholars we anticipate to result from the elimination of duration of status will directly and negatively impact the college's ability to provide its student body the high-quality instruction they require.

**D. Disruptions to academic programs**

35. The four-year status cap set by the Final Rule does not reflect academic realities at Reed College, where programs frequently take longer than four years to complete—in many cases as a matter of design.

36. Reed College offers 38 major areas and 62 separate major programs that collectively enroll 127 international students. A standard undergraduate degree at Reed takes 8 semesters. Reed also offers dual-degree programs with partner institutions, which combine coursework to award two degrees and require additional time to complete. None of Reed College's undergraduate major programs are designed to exceed four years.

37. However, even when a program is designed to last four years, it is commonplace for a student to take longer; this is not a sign of failure or fraud. Indeed, about 14 percent of undergraduates at Reed College take longer than four years to complete their bachelor's degree, including 21 percent of international students.

38. The elimination of duration of status creates considerable new uncertainty regarding the ability of students to complete their course of study at Reed College. Students are understandably concerned that they may be unable to obtain an extension of stay if needed, which would result in the loss of the years and significant financial resources invested in their U.S.-based education.

39. As a result of the changes in the Final Rule, Reed College may be required to make changes to its program offerings and academic pathways to ensure they remain open to international students. These changes may include no longer having applicants who are international students studying at a U.S. high school, which is a common pathway for Reed College international students. Additionally, Reed College is known for having one of the highest percentages of its undergraduates, including international students, go on to pursue a doctoral degree. Changes to the rule will make it nearly impossible for students to pursue such pathways due to the uncertainty and restrictions around the extension-granting process.

40. These changes are costly and time consuming to implement and, once implemented, are not easy to unwind. They are thus irreparable harms to the college.

**E. Harms to student success**

41. The Final Rule creates considerable uncertainty for current international students at Reed College who may take longer than four years and/or their program end date to

graduate.

42. One international student is enrolled in a program lasting longer than four years. This student will require seeking an extension of stay (EOS) in order to graduate. Additionally, based on past experience, we anticipate that at least 40 students enrolled in programs lasting four years or fewer will also require seeking an EOS to complete their program and ultimately graduate because their studies have taken longer than anticipated, as is commonplace.

43. Any student who must seek an EOS simply to complete their academic program faces some risk of falling out of status or having to leave the United States before their program is complete. For example, an immigration officer may deny the EOS or the student's application may be untimely or technically deficient. Based on existing processing delays at USCIS, it is substantially certain that students also will encounter considerable delay in filing their EOS requests and having those adjudicated.

44. This enhanced risk profile creates real-world harms that affect academic programs and the campus environment. We expect that student retention, graduation rates, and other markers of student success may suffer because of the Final Rule.

45. Additionally, students faced with this uncertainty may suffer academically. In my experience, students with external stressors or who face an uncertain risk often struggle academically because of stress, anxiety, distraction, and drains on time, resources, and attention.

**F. International travel harms**

46. International travel is a common feature of the educational and academic experience at Reed College. International students and scholars frequently travel abroad,

for instance to attend conferences, to study abroad, to perform their research duties, and as part of their classroom curriculum.

47. But current F-1 students may be deterred from traveling internationally after the Final Rule, because students who exit the United States and reenter will receive a new Form I-94 upon return, which would move them from duration of status to the fixed-term system. It would also reduce their grace period at the conclusion of their program from 60 days to 30.

48. These disincentives to travel may cause disruption to travel-based components to the academic experience at Reed College. Students may not be able to participate in study abroad, to complete travel-based components of their course work and research responsibilities, and attend academic and professional development opportunities. These harms to Reed College's ability to carry out its educational mission by ensuring that students and scholars are able to fully participate in academic offering are irreparable—those missed opportunities to provide academic enrichment cannot be recovered in the future.

49. For that reason, Reed College may need to restructure some of these academic offerings to accommodate international students who now feel unsafe to travel. These lasting changes to programs to accommodate the Final Rule are irreparable.

50. Study abroad programs and opportunities to conduct research at a school outside of the United States are core offerings of the Reed College education. The ability to live and learn in another culture and society enriches student's experience and expands their perspectives. Denying these opportunities to our international students limits the experience they can engage in and reduces the academic rigor they can experience while

at Reed College.

**G. Compliance costs and administrative burdens.**

51. The Final Rule is already causing and will continue to cause massive harms to Reed College as the International Student Services Office works to understand and adjust to the new requirements and ensure compliance.

52. Reed College designed its International Student Services Office in reliance on the duration of status system. All of Reed College's policies, trainings, and technological systems and processes were developed specifically with duration of status in mind. Reed College will now need to rebuild those systems from the ground up.

53. Compliance with the new rules will also require substantially more time and resources than duration of status, on an ongoing basis. Under duration of status, the International Student Services Office was able to use SEVIS to provide information about international students and scholars and easily update their I-20s and DS-2019s as conditions changed.

54. Now, Reed College anticipates our students needing to file 38 EOS requests every year. This means completing much more paperwork in connection with many more students. It also means additional compliance costs for the college and students, including application fees, travel for biometrics appointments and potentially interviews, and more.

55. Advising of students throughout the year will also be much more complex and will come with greater uncertainty and risk. The International Student Services Office must be equipped to train students on complex rules and project how to ensure that students who will need to submit EOS requests in the future will have those requests granted.

56. Reed College anticipates needing to divert significant resources to the International

Student Services Office to handle the changes of the Final Rule, including spending 135 hours on training, filing 38 new EOS requests each year, and spending several thousand dollars on legal consultation.

57. This diversion of resources to regulatory compliance will mean having to make cuts to International Student Services programs and administrative or academic offerings. Reed College has frozen its staff headcount, so no new staff is being hired currently. That means the time the International Student Services staff spends on this new rule takes time away from otherwise serving our international students, meaning less programming, less mentorship, and less time answering non-regulatory compliance questions.

58. These outlays would be unrecoverable and thus irreparable.

**H. Financial harms**

59. International students and scholars make significant contributions to Reed College through tuition, fees, housing, dining, and participation in research activities. These are significant sources of revenue which promote Reed College's financial stability and ensure its ability to offer the best services and programs to the campus community.

60. Any reduction in international student enrolment as a result of the Final Rule would disrupt these revenue streams and undermine Reed College's ability to support academic programs and institutional priorities.

61. Additionally, losing international enrollment would mean failing to recover on sunk investments in international student recruitment, admissions, and academic support.

62. This lost revenue and these sunken investments would be unrecoverable.

**I. Reputational harms**

63. Reed College prizes the reputation it has cultivated as a highly regarded institution

of higher learning that is an attractive destination for international students wishing to study in the United States. That is the result of decades of effort building relationships with international students, faculty, scholars, government agencies, and educational partners.

64. Presently, students and scholars from 45 countries are members of the Reed College community.

65. The Final Rule undermines international confidence in U.S. institutions of higher education, including Reed College. It communicates to people around the world, including prospective students and scholars and their families, that the United States is not welcoming to noncitizen students and that the policy and regulatory environment is unstable, unreliable, and unpredictable.

66. In Reed College's efforts to compete in a global marketplace for academic talent, it is seriously harmed when its identity as a U.S. institution becomes a hinderance rather than an asset. These harms are difficult to quantify but diminish Reed College's ability to recruit and retain academic talent, and ultimately to fulfill its research and educational objectives.

67. Such damage to Reed College's international reputation is also difficult to repair and effectively unrecoverable, even if the Final Rule were to ultimately be vacated.

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

Executed on August, 13 2026 at Reed College in Portland, Oregon.

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Karnell McConnell-Black

Vice President for Student Life

Reed College