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 THE UNIVERSITY OF ILLINOIS URBANA-CHAMPAIGN

DECLARATION OF THE UNIVERSITY OF ILLINOIS URBANA-CHAMPAIGN

I, Dr. Charles L. Isbell, Jr., declare as follows:

1. I am the Chancellor of the University of Illinois Urbana-Champaign ("University") and vice president, University of Illinois System. I have held that position since August 1, 2025. I served as Chancellor designate from July 26, 2025, through July 31, 2025. Before joining the University of Illinois, I served as Provost and Vice Chancellor for Academic Affairs at the University of Wisconsin-Madison for approximately two years.

2. In my role as Chancellor, I have personal knowledge of the contents of this declaration or knowledge of the matters based on my review of information and records gathered by University personnel and may testify thereto.

3. The University of Illinois Urbana-Champaign is a member institution of The Presidents' Alliance on Higher Education and Immigration, represented by its Chancellor, Charles L. Isbell, Jr. The University pays annual dues to the Presidents' Alliance on Higher Education and Immigration.

4. The University of Illinois Urbana-Champaign is a leading public research university with extensive undergraduate, graduate, professional, and research programs. International students and scholars play an important role in the University's educational, research, and instructional missions, and many academic programs, research laboratories, and instructional units rely on their participation. The University has developed academic programs, research initiatives, advising structures, and support systems over many years in reliance on the longstanding Duration of Status framework.

5. I am familiar with the Department of Homeland Security's final rule eliminating Duration of Status and replacing it with a fixed admission period and Extension of Stay process. Based on my review of the rule and information provided by University personnel, I understand

that the rule will change how the University administers graduate education, staffs research programs, advises international students and scholars, and conducts long-term academic planning.

A. Academic Mobility and Graduate Education Structures

6. Many of the University's graduate programs were developed with the expectation that students would be able to refine academic objectives and progress through various degree pathways as their research develops. These pathways include master's-to-doctoral progression, embedded graduate credentials, and other structures that depend upon educational flexibility.

7. The challenged rule restricts forms of educational progression that have historically been available to international students and therefore requires the University to evaluate whether existing degree structures, advising practices, and program requirements can continue to operate as designed.

8. Since Fall 2021, 324 international graduate students have changed graduate programs, including 104 students who progressed from master's programs into doctoral programs, 100 students who moved from doctoral programs into master's programs, and 106 students who moved between master's programs.

9. University personnel have received inquiries from students and faculty regarding the rule's potential impact on educational progression, including the ability to complete current academic programs, pursue additional academic objectives, and navigate degree transitions that have historically been managed through existing academic processes.

10. These transitions are a routine feature of graduate education at the University. They allow students to align their studies with evolving research interests, faculty mentorship opportunities, laboratories, and scholarly goals.

11. The challenged rule restricts educational-objective changes that have routinely

occurred within the University's graduate programs. As a result, academic pathways that have historically been available to international students may no longer be available in the same form, affecting the University's ability to place students in appropriate academic programs, align students with faculty mentors and research opportunities, and administer graduate education in the manner historically used by the University.

12. One example of a graduate program intentionally designed to facilitate mobility is the School of Molecular and Cellular Biology's ("MCB") umbrella admissions model, a longstanding component of graduate education in the biological sciences. Under this model, students are admitted to a broad graduate program and later join specific departments, laboratories, and faculty research groups based on laboratory rotations, research experiences, and developing scholarly interests.

13. The admissions and placement model currently relies on the ability of students to explore multiple research disciplines during their first year and then move to the laboratory, department, and research environment best suited to their developing interests. Currently, 52% of MCB PhD students are international students. Faculty members have already expressed concerns regarding how the rule may affect graduate students whose academic and research trajectories evolve after enrollment, particularly in programs where students are expected to identify laboratories and research mentors after beginning their graduate studies.

14. The flexibility built into this model allows students and faculty members to make informed decisions regarding research placement and mentorship after a student has begun graduate study. The challenged rule creates uncertainty regarding the continued operation of this model because limitations on educational-objective changes may restrict the University's ability to facilitate transitions and placements that are currently an ordinary and expected part of the program.

15. As a result, the rule affects a core mechanism through which the University recruits, trains, mentors, and places graduate students in research programs. If implemented as written, the rule may require the University to alter longstanding admissions, advising, and research-placement practices that were designed specifically to provide flexibility as students identify the laboratories, faculty mentors, and research programs best suited to their academic and professional development and as faculty members make academic decisions to most effectively train students.

B. Doctoral Education

16. The University's doctoral education model is built around individualized research training, faculty supervision, and ongoing evaluation of academic progress. Doctoral programs are designed around research milestones, dissertation development, and scholarly achievement rather than fixed periods of admission.

17. Consistent with that model, approximately 93% of the University's international doctoral graduates require more than four years to complete their degree programs. Completion commonly requires five to seven years, making the need for additional authorization under the rule a routine occurrence rather than an exception.

18. Under the challenged rule, the overwhelming majority of international doctoral students who are making satisfactory academic progress will be required to seek continued authorization through the Extension of Stay process or by traveling internationally with an unexpired visa and updated I-20 to receive a new Admit Until Date on reentry in order to complete their degree programs. The rule therefore introduces an additional layer of federal immigration review into programs that have historically been governed by academic progress and faculty evaluation.

19. Since publication of the rule, University officials have received inquiries from international doctoral students regarding the need to seek I-20 extensions, the impact of the rule on

anticipated completion timelines extending beyond current program end dates, and the potential need to pursue Extension of Stay applications to complete doctoral programs. The new process requiring approval by U.S. Citizenship and Immigration Services ("USCIS") rather than the current institutional process creates uncertainty regarding approval standards, anticipated USCIS processing times, and the interaction between immigration timelines and academic milestones that may impact students' ability to remain in the United States through degree completion. In addition, students seeking Extension of Stay face the additional financial burden of paying a new fee not previously required and bearing the cost of travel for biometrics if required.

20. International doctoral students play important roles in the University's research and instructional missions. They serve as graduate research assistants, teaching assistants, laboratory personnel, and members of faculty research teams, and many research and instructional activities depend upon their continued participation and developed expertise throughout the course of their degree programs. Senior-level graduate students often possess similar levels of expertise in their later years as postdoctoral researchers. Such students possess technical expertise, research training, and project-specific knowledge developed over multiple years and cannot readily be replaced without disrupting ongoing research activities. The University has identified approximately 66 graduate programs in which international students comprise at least 75 percent of enrolled students.

21. As a result, the University must incorporate federal immigration-adjudication timelines and uncertainty into doctoral education and long-term research planning, including graduate funding decisions, instructional assignments, research appointments, and degree-completion planning. Because approximately 93% of international doctoral graduates require more than four years to complete their programs, these impacts are not limited to exceptional cases but affect the overwhelming majority of the University's international doctoral students and the academic and

research programs in which they participate.

C. Research Staffing and Postdoctoral Scholars

22. The University currently hosts approximately 536 active J-1 research scholars and short-term scholars. University data indicate that approximately 450 of these scholars have program end dates expiring before December 2027. Many of these individuals serve as postdoctoral researchers and other research personnel who support the University's research enterprise. They contribute to externally funded research projects, laboratory operations, technical research activities, data collection, publications, and other core research functions. In many instances, these individuals provide continuity for ongoing research activities and help the University meet research objectives, grant commitments, and project deadlines.

23. The challenged rule subjects these J-1 scholars to the new fixed-period admission framework and related Extension of Stay requirements. As a result, a significant portion of the University's current research workforce will depend on additional federal immigration filings and adjudications to continue research activities that are presently authorized and ongoing.

24. These impacts extend beyond the immigration status of individual scholars. The rule affects the continuity of research staffing across numerous laboratories and research programs that rely upon the continued participation of highly specialized research personnel. Many affected scholars possess technical expertise, research training, and project-specific knowledge developed over multiple years and cannot readily be replaced without disrupting ongoing research activities. In some research areas, the number of individuals with the necessary training and expertise is limited, making replacement difficult and potentially affecting the University's ability to conduct specialized and cutting-edge research.

25. The University therefore expects the rule to affect research planning, research

staffing, and the administration of sponsored research projects that depend upon the continued participation of specialized J-1 research scholars and postdoctoral researchers.

D. Recruitment and Enrollment

26. The University has recently experienced significant challenges in recruiting international graduate students. When a prospective international student chooses to pursue graduate education at an institution in another country, the University generally loses the opportunity to recruit that student in a future admissions cycle. This concern is heightened by the increasingly competitive global landscape for graduate education, in which prospective students have access to high-quality educational and research opportunities at leading universities throughout the world. The University is concerned that the rule may further discourage prospective international students from enrolling at Illinois at a time when international graduate recruitment has already experienced significant declines.

27. Between the 2025 and 2026 admissions cycles, international graduate applications declined by approximately 25.1%. International doctoral applications declined by approximately 16.3%. International doctoral admissions and accepted offers each declined by more than 21%. Approximately 73% of the University's graduate programs experienced declines in international applications.

28. These trends are significant because international graduate students make substantial contributions to the University's research enterprise, graduate education programs, teaching mission, and externally funded research activities and comprise approximately 49% of full-time non-Optional Practical Training graduate students. Furthermore, the University has devoted substantial resources to recruiting international graduate students and developing programs that depend upon their participation.

29. University officials have already received communications from current and prospective international students expressing concern regarding the impact of the rule on degree completion timelines, future educational plans, international travel, and their ability to remain in the United States while pursuing their academic objectives.

E. Research Travel and International Collaboration

30. Many academic programs at the University incorporate international travel, field research, scholarly exchanges, conference participation, and collaboration with researchers and institutions around the world. These activities are important components of graduate training, faculty scholarship, dissertation research, and international research partnerships.

31. Faculty members and students have identified concerns regarding international travel under the new framework, including questions about reentry to the United States following conferences, research travel, and other academic activities abroad. University personnel have already received inquiries from students seeking guidance regarding international conference travel and the effect of the rule on reentry following travel outside the United States. These concerns may discourage participation in conferences, field research, and other international academic activities that are important components of graduate education and research.

32. To the extent students forgo such opportunities because of concerns arising from the new regulatory framework, the University's ability to provide educational experiences, support international collaborations, and conduct groundbreaking research may be adversely affected.

F. Administrative and Operational Impacts

33. The challenged rule has already required the University to devote substantial resources to understanding and responding to its effects. The University has established a cross-campus effort involving Illinois International, the Graduate College, the Office of the Provost, and

other units to evaluate the implications of the rule. Academic and administrative units have begun reviewing admissions practices, advising structures, funding timelines, academic milestones, completion planning, and support systems for international students and scholars. Departments and colleges are evaluating the effect of the rule on academic programs developed under the longstanding Duration of Status framework.

34. Since publication of the rule, academic departments, graduate programs, and administrative units have received a substantial increase in requests for advising from students regarding I-20 extensions, doctoral completion timelines, travel planning, degree progression, and implementation of the new framework.

35. These efforts require institutional resources that would not otherwise be necessary. The University is currently committing personnel and administrative resources to understanding the rule, identifying affected students and programs, developing institutional guidance, and evaluating whether modifications to existing programs and practices may be required. These activities are being undertaken solely because of the challenged rule.

G. Irreparable Harm

36. The University's concerns regarding the rule are not merely prospective. Since publication of the rule, students, faculty members, and academic units have already begun adjusting academic planning, seeking guidance regarding program completion and immigration timelines, requesting extensions of immigration documents, and raising concerns regarding the impact of the rule on educational and research activities.

37. The impacts of the challenged rule are institutional in nature. The rule affects the University's ability to administer graduate education, maintain established academic pathways, support research activities, recruit and retain talented students and researchers, and continue

operating programs developed in reliance on the longstanding Duration of Status framework. Many of these harms cannot be fully remedied after the fact. Academic pathways that are restricted, research activities that are disrupted, and institutional resources expended in response to the rule cannot readily be restored through subsequent relief. For these reasons, the University faces substantial and irreparable harms if the rule is permitted to take effect.

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

Executed on August 14, 2026 at Urbana, Illinois.

Dr. Charles L. Isbell, Jr.