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 AMY RAMIREZ
UNIVERSITY OF MARYLAND, BALTIMORE

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I, Amy Ramirez, declare as follows:

1. I am the Executive Director of the Office of International Services at the University of Maryland, Baltimore (UMB). I have held this role since April 18, 2011. The responsibilities of my office include managing UMB's F-1 and J-1 visa sponsorship programs. As Executive Director of the Office of International Services, 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. UMB is a member institution of The Presidents' Alliance on Higher Education and Immigration, represented by its President, Bruce Jarrell.

3. 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

4. UMB is the State of Maryland's public academic health and law university devoted to professional and graduate education, research, patient care, and public service. UMB enrolled 6,784 students in the Fall 2025 semester in 99 degree and certificate programs. In addition, UMB employed 7,984 faculty, postdoctoral fellows, and staff in the Fall 2025 semester.

5. International students and scholars are vital members of the community at UMB as

teachers, researchers, students, and colleagues. UMB currently sponsors 378 current F-1 and J-1 students and scholars (including alumni on post-completion optional practical training) and is expecting to enroll 71 F-1 and J-1 students and scholars who are due to arrive for the Fall 2026 semester.

6. UMB enrolls approximately 153 international students with F-1 status. This includes 7 students enrolled in undergraduate programs, 43 students enrolled in graduate master's and professional programs, and 103 students enrolled in PhD programs. Approximately 86 F-1 students at UMB are enrolled in STEM disciplines and 67 are enrolled in other disciplines.

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

8. F-1 students follow many academic paths at UMB. The majority of UMB's F-1 students are enrolled in PhD degree programs. At the graduate level, it is not uncommon for students, including international students, to need over five years to complete their degree programs. In addition, many graduate and professional students opt to enroll in a second degree program in a different field of study after they have matriculated in their first UMB degree program (e.g., pursuing an MBA degree alongside their JD, PharmD or DDS degree). The final regulation prohibits graduate and professional students from changing fields of study upon their arrival in the U.S.

9. Approximate 115 J-1 exchange visitors are affiliated with UMB, including 8 students, 98 postdoctoral fellows and faculty, and 9 visiting scholars and professors.

10. Without the Final Rule, UMB would expect to sponsor more J-1 exchange visitors in a typical year. UMB has experienced a drop in the number of J-1 visa documents issued for new J-1 students and scholars in 2025 and 2026 compared to previous years.

11. UMB expects that many of its J-1 exchange visitors will be affiliated with the institution for longer than four years. For example, some J-1 scholars who start at UMB as postdoctoral fellows are promoted into a faculty position due to their research expertise and productivity. Similarly, even where a J-1 exchange visitor may not be affiliated with the university for longer than four years, it is often necessary to adjust their anticipated program end date reported on their DS-2019. For example, J-1 scholars often move between different laboratories and research projects at UMB due to shifts in funding, evolving research interests, or departures of Principal Investigators to other institutions while the J-1 scholar remains at UMB.

12. All international members of the UMB community are valued teachers, students, researchers, and colleagues. International graduate and professional students add a global perspective to classroom discussions in our degree programs. One of our faculty members indicated "In health education, it goes without saying that we need the voices of our global neighbors in our classrooms. International students bring their lived experiences and expertise with health systems abroad to our class discussions in a way that is difficult to replicate."

13. At UMB, the majority of our postdoctoral fellows are international. They bring global perspectives and create visibility internationally for the university as a cutting-edge research center. They are critical contributors to research that improves the health of the American people, on topics ranging from cancer, cardiovascular disease, the gut microbiome and psychiatric disease. UMB's international students contributed $13.9 million to the university and the surrounding community in the 2024-2025 academic year, according to NAFSA's International Student Economic Impact report.

14. UMB devotes significant time and resources to serving our international community members and ensuring their compliance with all applicable immigration laws. Our Office of

International Services consists of five professionals who serve as F-1 Designated School Officials and J-1 Alternate Responsible Officers, whose job duties consist of assisting international students and reporting required information via SEVIS.

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

B. Harms to recruitment, enrollment, and retention

16. Since the publication of the Final Rule, UMB 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.

17. I am aware of 32 students admitted for the Fall 2026 semester who have already decided against joining our academic community since the announcement of the Final Rule. I am also aware of 14 students who have requested a deferral of their admission, citing the announcement of the Final Rule. Finally, we have heard from prospective applicants to our degree programs that they are unsure whether to apply to the program because of the prohibitions on pursuing a second degree at the same educational level.

18. 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. A number of students who graduated from UMB have left the U.S. to pursue further education and research in Canada, Europe and Australia, when they previously preferred to remain in the U.S. to pursue their academic careers.

19. Additionally, I am aware of a trend of declining enrollment of international students at UMB 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. While Fall 2026 new student enrollment numbers have not yet been finalized at the time of writing, new F-1 and J-1 student enrollment dropped from 87 students in Fall 2024 to 54 students in Fall 2025, representing a 37.9% decrease. We anticipate that new student enrollments in Fall 2026 will be similar to Fall 2025.

20. All told, UMB believes that students' concerns about their ability to complete their studies absent duration of status is a major deterrent to joining UMB or any other U.S. institution of higher learning. It is a major influence on enrollment decisions.

21. 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 university in future years, even if conditions change. Likewise, scholars who decline to come to UMB and instead choose to complete academic milestones like visiting professorships and postdoctoral fellowships in other countries are unlikely to be recovered by the university.

22. UMB competes in a global marketplace for top academic talent. In my experience, U.S.-based institutions like UMB 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.

23. Accordingly, the future loss of international students and scholars at UMB 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 UMB 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.

C. Harms to research and teaching

24. Many international scholars and students at UMB, particularly graduate students, make critical contributions to the classroom instruction and research capabilities of the university.

25. At UMB, we have 158 international graduate and professional students, 4 international visiting professors, 81 international postdoctoral fellows, and 22 other F-1 and J-1 international students and scholars who occupy teaching and/or research roles.

26. Often the research performed at UMB spans multiple years and its success depends in part on continuity of research staff.

27. 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 UMB by disrupting the continuity of research teams and draining the university of talented individuals.

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

29. 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 university's ability to provide its student body with the high-quality instruction they require.

D. Disruptions to academic programs

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

31. UMB offers 16 doctoral degree programs that collectively enroll 103 international students. The average time to complete a doctoral degree at UMB is 5 years. The percentage of

our doctoral programs designed to exceed four years is 100 percent.

32. The elimination of duration of status creates considerable new uncertainty regarding the ability of students to complete their course of study at UMB. 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.

33. Other aspects of the Final Rule likewise conflict with program design at UMB. For example, the rule prohibits graduate students from transferring between programs and prohibits students from enrolling in a program at the same or lower level than the program they completed. But these are ordinary sequences at UMB. Students, including international students, often transfer programs or enroll in one program at the same or lower level than the one they just completed. For example, we have international students who seek to obtain an MBA degree at a nearby university while they are pursuing a JD degree from our Law School. Due to the structure of the dual degree program, law students must pause their enrollment in JD courses, pursue their MBA at the Johns Hopkins University Carey Business School, and return to UMB to finish their JD degree. This entails both a transfer of their F-1 visa sponsorship between UMB and Johns Hopkins University and a drop in degree level from a professional practice doctorate to a master's degree. Students are taking this pathway because it makes the most sense for them academically and professionally.

34. As a result of the changes in the Final Rule, UMB 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 having students pursue part of their PhD programs from outside the U.S., resulting in a loss of their valued perspectives in our classrooms, their work on research grants in our laboratories, and their economic contributions to businesses in the local community.

35. These changes are costly and time consuming to implement and, once implemented,

are not easy to unwind. They are thus irreparable harms to UMB.

E. Harms to student success

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

37. Some 103 international students are enrolled in programs lasting longer than four years. These students all will require seeking an extension of stay (EOS) in order to graduate. Additionally, based on past experience, we anticipate that at least 10 students enrolled in programs lasting four years or fewer will also require an EOS to complete their program and ultimately graduate because their studies have taken longer than anticipated, as is commonplace.

38. 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 DHS, it is substantially certain that students also will encounter considerable delay in filing their EOS requests and having those adjudicated.

39. 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.

40. 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.

41. A significant drop in PhD conferrals due to international student attrition may cause UMB to lose its status as a Carnegie Classified Research 1 institution. To be classified as a R1

institution, UMB must confer 70 PhD degrees per year based upon a three-year rolling average. While the numbers of PhD degrees vary from year to year, UMB typically confers between 65 and 85 degrees each year. International students represent 28 percent of our PhD student enrollments. If significant numbers of international PhD students were to leave UMB without graduating due to extension denials, that could impact our status as a R1 institution. Increased levels of international student attrition will also count as a negative factor during our next accreditation review by the Middle States Commission on Higher Education, as retention and graduation rates are key metrics used by regional accreditors evaluating institutional performance. Losing R1 status would compromise UMB's ability to compete for research funding and visibility in a very crowded landscape.

F. Student travel harms

42. International travel is a common feature of the educational and academic experience at UMB. 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.

43. 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 to 30 days.

44. These disincentives to travel may cause disruption to travel-based components of the academic experience at UMB. 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 UMB'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.

45. Furthermore, recent reports of noncitizens with pending immigration applications taken into custody at U.S. airports during domestic travel have made travel within the U.S. significantly more perilous. Every F-1 and J-1 student and scholar whose timely filed EOS is pending past their expiration date due to USCIS adjudication delays will potentially face the same risk if they choose to attend a conference within the U.S. This news has already caused significant anxiety and concern for international students and scholars who had plans to travel to academic conferences and visit colleagues and friends within the U.S.

46. For that reason, UMB 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.

47. Particularly for graduate students, postdoctoral fellows and faculty members, travel to international conferences is critical to their development as scholars. Their presence at conferences also increases the visibility of UMB research within their disciplines. Conference attendance fosters research collaborations that lead to more research funding for UMB and discoveries that impact American's health and well-being. Due to the risks of international travel to F-1 and J-1 students and scholars, and the negative immigration implications of travel after implementation of this rule, this rule represents an irreparable harm to international students' and scholars' participation in the academic community and potential losses of new research that positively contribute to both UMB and the American public.

G. Compliance costs and administrative burdens

48. The Final Rule is already causing and will continue to cause massive harms to UMB as the Office of International Services works to understand and adjust to the new requirements and ensure compliance.

49. UMB designed its OIS in reliance on the duration of status system. All of UMB's policies, trainings, and technological systems and processes were developed specifically with duration of status in mind. UMB will now need to rebuild those systems from the ground up.

50. 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, OIS 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.

51. Now, UMB anticipates needing to file 120 EOS requests every year. This means completing much more paperwork in connection with many more students. It also means additional compliance costs for universities and students, including application fees, travel for biometrics appointments and potentially interviews, and more.

52. Advising students throughout the year will also be much more complex and will come with greater uncertainty and risk. OIS 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.

53. UMB anticipates needing to divert significant resources to OIS to handle the changes of the Final Rule, including spending 100 hours on training its staff members as well as other professionals throughout UMB, filing 120 new EOS requests each year, and spending approximately $35,000 on legal consultation fees.

54. This diversion of resources to regulatory compliance will mean having to make cuts

elsewhere to programs and administrative or academic offerings, such as academic support services that facilitate the success of all students and internal grants to support student and scholar participation in academic activities such as conferences.

55. These outlays, and cuts to programs elsewhere, would be unrecoverable and thus irreparable.

H. Financial harms

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

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

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

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

I. Reputational harms

60. UMB 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.

61. Currently, students and scholars from 75 countries are members of the UMB community.

62. The Final Rule undermines international confidence in U.S. institutions of higher education, including UMB. 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.

63. In UMB'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 hindrance rather than an asset. These harms are difficult to quantify but diminish UMB's ability to recruit and retain academic talent, and ultimately to fulfill its research and educational objectives.

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

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 Baltimore, Maryland.

Amy Ramirez