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 JOHN ZUMBRUNNEN, PROVOST, UW-MADISON

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I, John Zumbrunnen, declare as follows:

1. I am the Provost and Executive Vice Chancellor for Academic Affairs at the University of Wisconsin-Madison ("UW-Madison"). The responsibilities of my office include oversight of all academic program and budget planning involving thirteen schools and colleges; faculty and staff development, and personnel matters; as well as, oversight of the following areas: enrollment management, including undergraduate recruitment and admissions, student financial aid, and registrar; teaching and learning; outreach, extension and public media; information technology (in collaboration with the vice chancellor for finance and administration); libraries; and international affairs. As Provost, 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. UW-Madison is part of the Universities of Wisconsin, a statewide system of higher education in Wisconsin. The Universities of Wisconsin are a state agency subject to Chapter 36 of the Wisconsin Statutes and are governed by an eighteen-member Board of Regents of the University of Wisconsin System.

3. The Universities of Wisconsin is a member institution of the Presidents' Alliance on Higher Education and Immigration, represented by Renée Wachter, the Interim President of the Universities of Wisconsin. The Universities of Wisconsin 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 time period based on their length of program, not to exceed 4 years absent an extension approved by immigration officials.

A. Background

5. UW-Madison is a public, land-grant university with thirteen schools and colleges; a major research institution; and home to the Division of Extension, which provides programming throughout the State of Wisconsin. UW-Madison grants undergraduate, graduate, and professional degrees and provides robust non-degree programming ranging from professional development to personal enrichment.

6. International students and scholars are vital members of the community at UW-Madison as teachers, researchers, students, and colleagues.

7. UW-Madison enrolls approximately 7,000 international students with F-1 status. This includes approximately 3,400 students enrolled in undergraduate programs, 1,200 students enrolled in master's degree programs, and 2,100 students enrolled in PhD and doctorate programs. Approximately 4,200 F-1 students at UW-Madison are enrolled in STEM disciplines, and 2,800 are enrolled in other disciplines.

8. Based upon application trends and anecdotal information from applicants and admissions staff, UW-Madison believes the Final Rule will decrease the number of F-1 students who enroll at the university.

9. F-1 students follow many academic paths at UW-Madison. For example, while many undergraduates enroll in four-year degree programs and complete their degrees in four years, many students take more than four years to graduate. Indeed, fifteen percent of F-1 international

undergraduate students take longer than four years to earn their bachelor's degree. International students who completed a doctoral degree in the last ten years have a median time to degree of 5.8 years. Only thirty-six percent of doctoral students with degrees conferred over the last ten years completed the doctoral degree in five years or less, and only eight percent of doctoral students in cohorts from 2011-2016 completed their degree in four years or less.

10. Eight-hundred and one (801) J-1 exchange visitors are currently affiliated with UW-Madison, including 260 students and 541 research scholars and professors which include postdoctoral fellows, visiting assistant professors, and other similar titles.

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

12. UW-Madison expects that many of its J-1 exchange visitors will be affiliated with the institution for longer than four years. Currently, UW-Madison has 137 scholars whose programs are longer than five years. UW-Madison encourages scholars and their hosting departments to use all five years of J-1 scholar eligibility. 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, a grant funded postdoctoral fellow may be hired for two years initially, and then their appointment and program is extended for an additional two or three years once additional funding is secured. UW-Madison also commonly brings visiting professors to teach courses in their area of expertise for two years and then their hosting department requests an extension for an additional year if enrollment supports the request.

13. International members of the UW-Madison community are valued teachers, students, researchers, and colleagues. International scholars and visiting professors, many of whom

are J-1 nonimmigrants, help UW-Madison faculty further their research objectives and provide unique learning opportunities for UW-Madison students. Faculty often state it is difficult to recruit postdoctoral researchers domestically due to financial incentives in private industry. Being able to recruit the best international talent helps to keep UW-Madison at the forefront of research in fields like engineering, health care, and artificial intelligence. Visiting professors, many of whom are J-1 nonimmigrants, also contribute to a vibrant learning environment at UW-Madison where students have the opportunity to take courses in international law and political science taught by experts from a range of different countries. Also, many financial benefits are derived from enrolling international students – e.g. tuition, grant funds/other revenue generated by research supported by international students. F-1 and J-1 nonimmigrants at UW-Madison make up approximately sixteen percent of enrollments but contribute seventeen percent of net tuition revenue. F-1 and J-1 nonimmigrants are approximately twelve percent of scholarship athletes. Approximately forty percent of the primary appointments of graduate fellows, trainees, research assistants, teaching assistants, and project assistants, are international students, the vast majority of which are F-1 and J-1 nonimmigrants. In fall 2025, forty-six percent of our primary appointment teaching assistants at UW-Madison were international students. Graduate international students are vital to the operational sustainability of the institution as they are embedded in the research enterprise as well as the teaching mission and instruction of undergraduate and graduate students.

14. UW-Madison devotes significant time and resources to serving our international community members and ensuring their compliance with all applicable immigration laws. Our International Student Services and International Faculty and Staff Services offices consist of thirty-two professionals (inclusive of one currently vacant position), including twenty-two Designated School Officials ("DSOs") and nineteen Alternate Responsible Officers ("AROs"), whose job

duties consist of assisting international students and scholars and reporting required information via the federal Student and Exchange Visitor Information System ("SEVIS").

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

B. Harms to recruitment, enrollment, and retention

16. Since the publication of the Final Rule, UW-Madison 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. Graduate students who have previously committed to attending the University have since withdrawn. For example, we received the following emails from two graduate program applicants:

- "After careful consideration, I have made the difficult decision to withdraw from the program and not proceed with my plan to study in the United States. A significant factor in my decision was the recently published DHS final rule, *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*. Given my prior education, the policy direction has created uncertainty for my longer-term academic planning. And after weighing these circumstances carefully, I do not feel that I can proceed with my studies in the United States as originally planned and I won't come to United States this academic year."
- "I wanted to share a brief update regarding the UW–Madison program. Unfortunately, I had to withdraw from the program and abandon my plans to study in the United States.

The recent DHS final rule, together with reports that a potential $100,000 fee for OPT is being considered, created substantial uncertainty for my academic and immigration plans. These developments also raised significant concerns regarding my student visa situation. Given my prior education, I was left with no realistic choice but to withdraw."

17. Additionally, I am aware of a trend of declining enrollment of international students and scholars at UW-Madison 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.

18. In application year 2024, UW-Madison received 13,080 undergraduate applications from prospective international students, and, in application year 2025, the university received 14,433 undergraduate applications from prospective international students. In application year 2026, however, UW-Madison received only 12,857 applications, which was a year-over-year decline of 10.9%.

19. From application year 2025 to application year 2026, UW-Madison experienced a substantial decline in sponsored undergraduate applications from prospective international students, decreasing from 372 to 108. This was accompanied by a significant reduction in deposits from prospective international students, which fell from ninety-five to thirty-three. Of the thirty-three deposits from application year 2026, at least five students have since withdrawn, citing concerns related to visa processing and federal immigration policies.

20. Sponsor representation for international applicants also declined considerably, with the number of unique sponsoring organizations decreasing from twenty-seven to fourteen. The most significant reductions occurred among UW-Madison's three largest sending markets in the Middle East: Saudia Arabia (134 to 7), the United Arab Emirates (85 to 5), and Oman (45 to 20). UW-Madison also experienced a complete loss of sponsored applications from Malaysia (65 to 0).

Of four new sponsored students from Papua New Guinea who confirmed their enrollment in early June 2026, only one is still planning to come to UW-Madison this fall. The U.S. Embassy in Port Moresby shared that they believed the other three students opted against pursing university education in the United States as a result of concerns about the visa and immigration policies.

21. The Graduate School experienced a twenty-seven percent decrease in international student applications for fall 2026 compared to fall 2025. The Graduate School also experienced a twenty-seven percent decrease in admits and is likely to experience at least a twenty percent decrease in international student enrollment based on the data at this time.

22. All told, UW-Madison believes that students' concerns about their ability to complete their studies absent duration of status is a major deterrent to joining UW-Madison or any other U.S. institution of higher learning. It is a major influence on enrollment decisions. Across academic divisions, graduate program departments consistently emphasize that this policy will likely affect international recruitment and program competitiveness, as many international applicants have opportunities in countries where doctoral training timelines are more flexible.

23. Furthermore, graduate faculty have shared the following:

- "This year we saw a significant decrease in the number of international applicants to our PhD program, especially in the most competitive group. We anticipate that if this rule is implemented, our applicants would plummet to the point that we would have very few international students in our program because those with the options to go elsewhere would. Who would risk committing [to] a program that they may not be allowed to finish?"
- "From our department's standpoint, there are significant issues as it would significantly change our program for international students and possibly change the caliber of student that we can yield. Although some first-year courses in 3 of our 4 program areas could be

taught online, it would impact the ability of students to learn and grow together as a cohort. But beyond that social aspect, we wouldn't be able to fund students who are fully remote."

24. 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 UW-Madison and instead choose to complete academic milestones like visiting professorships and postdoctoral fellowships in other countries are unlikely to be recovered by the university.

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

26. Accordingly, the ongoing and future loss of international students and scholars at UW-Madison due to the elimination of duration of status is a concrete, immediate, and irreparable harm. Each lost enrollment of an international student or scholar leaves UW-Madison 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

27. Many international scholars and students, particularly graduate students, at UW-Madison make critical contributions to the classroom instruction and research capabilities of the university.

28. At UW-Madison, we have approximately 3,300 graduate students in F-1 status, ten

international visiting professors in the J-1 Professor category, and approximately 550 international researchers, the vast majority of which are J-1 nonimmigrants.

29. Often the research performed at UW-Madison spans multiple years and its success depends in part on continuity of research staff. Graduate research begins from the very start of a student's program in the form of lab rotations alongside coursework. These lab rotations are critical for identifying thesis research labs and last for one semester. After initial rotations, graduate students in doctoral research programs complete multiple years of research. The four-year limit in the Final Rule does not allow for the typical progression and continuity of research that is necessary for PhD degrees.

30. 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 UW-Madison by disrupting the continuity of research teams and draining the university of talented individuals.

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

32. 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.

33. The lack of mobility of international graduate students will also negatively impact faculty mobility. At research universities, such as UW-Madison, graduate students are an important part of faculty members' research programs, as graduate students' multi-year academic work and paid university employment complements their faculty advisor's research program. As

an R1 university (designated by the Carnegie Classification System as "very high research activity"), UW-Madison competes for faculty members who have already begun academic employment and established graduate student advising relationships at other universities. It is not unusual for a newly hired faculty member to bring their current graduate students with them to their new institution. If faculty members cannot bring their current international graduate student advisees to a new institution, it will be a disincentive for them to change institutions. This will negatively impact UW-Madison's ability to recruit top faculty talent.

D. Disruptions to academic programs

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

35. UW-Madison offers over one hundred doctoral degree programs that collectively enroll around 2,100 F-1 students. The average time to complete a doctoral degree at UW-Madison is 5.8 years. One hundred percent of our research doctoral programs are designed to take more than four years in order to complete the required credits and research requirements. The expected program completion length UW-Madison reports on the I-17 for all of our doctoral research programs is more than four years.

36. 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, fifteen percent of undergraduates at UW-Madison take longer than four years to complete their bachelor's degree, including fifteen percent of international students.

37. The elimination of duration of status creates considerable new uncertainty regarding the ability of international students to complete their course of study at UW-Madison. 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.

38. Other aspects of the Final Rule likewise conflict with course design at UW-Madison. 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 UW-Madison. Students, including international students, transfer programs or enroll in one program at the same or lower level than the one they just completed. For example, nineteen percent of international doctoral degree recipients started in a master's level program and eighteen percent of international master's degree recipients started in a doctoral level program. Twelve percent of international doctoral degree recipients graduated in a different doctoral program than they started in, and five percent of international master's degree recipients graduated in a different master's program than they started in. Students are not taking this pathway to defraud the system; they are taking this pathway because it makes the most sense for them academically and professionally.

39. As a result of the changes in the Final Rule, UW-Madison may be required to make changes to its program offerings and academic pathways to ensure they remain open to international students, including increasing online modality, increased summer term offerings, increasing maximum credits per semester, and allowing for dissertation writing outside of the United States.

40. The Graduate School solicited input from selected Chairs and Directors of Graduate Studies across the four academic divisions regarding the rule change. Programs were asked specifically about the feasibility of three possible adaptation strategies: (1) front-end online coursework before arrival, (2) remote completion of the dissertation on the back end, and (3) admitting

only students with prior master's degrees and transferable graduate credits. Across divisions, the dominant response was that none of the proposed models would fully address the challenges posed by a strict four-year limit. Most graduate programs do not currently have a robust infrastructure to support online courses. The online modality is mostly supported by central campus resources, but the current staffing level and resources are not sufficient for an institutional initiative restructuring hundreds of graduate programs.

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

E. Harms to student success

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

43. Approximately 2,100 international students are enrolled in programs lasting longer than four years. These students all will be required to seek an extension of stay ("EOS") in order to graduate. Additionally, based on past experience, we anticipate that at least five hundred 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.

44. 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.

45. 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.

46. Additionally, students faced with this uncertainty or who overload credit to finish in four years 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

47. International travel is a common feature of the educational and academic experience at UW-Madison. 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.

48. 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 sixty days to thirty days. These aspects of the Final Rule will not only harm international students and scholars, but the Principal Investigator on grants, co-authors on scholarly articles, their field of study, and UW-Madison's reputation.

49. These disincentives to travel may cause disruption to travel-based components of the academic experience at UW-Madison. Students may not be able to participate in study abroad, to complete travel-based components of their course work and research responsibilities, or attend academic and professional development opportunities. The prospect of limited travel will

undoubtedly lead to major disruption in graduate student studies. Some graduate programs not only encourage international travel but may even require it based on the research required for that particular field. If graduate students are required to travel to achieve their academic and research requirements, but also may face the threat of a new admit-until-date that limits their time to achieve their goals in the United States, it is likely these students will not even begin the pursuit of their graduate studies in this country. These harms to UW-Madison'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.

50. For that reason, UW-Madison 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.

G. Compliance costs and administrative burdens

51. The Final Rule is already causing and will continue to cause significant harms to UW-Madison as the university works to understand and adjust to the new requirements and ensure compliance.

52. UW-Madison designed its International Student Services and International Faculty and Staff Services offices in reliance on the duration of status system. All of UW-Madison's policies, trainings, and technological systems and processes were developed specifically with duration of status in mind. UW-Madison 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, International Student Services and International Faculty and Staff Services were 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, UW-Madison anticipates its students and scholars will need to file over 2,000 EOS requests every year. This means completing much more paperwork in connection with many more students and scholars. It also means additional compliance costs for universities and their students and scholars, including application fees, travel for biometrics appointments and potentially interviews, and more. Using OMB's estimated DSO and ARO administrative burden cost per EOS request, it will cost International Student Services and International Faculty and Staff Services an estimated $ $600,000 per year.

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

56. Academic advisors outside of International Student Services and International Faculty and Staff Services will also need to be trained on the new rules. Presently, students declare their major when they are able and ready consistent with program requirements. Now, academic advisors will need to be trained to evaluate whether a student can declare or change their major based upon immigration status. Current campus information guides for programs that permit declaration of a major during the first year of undergraduate education will need to be updated. Some classes are only available to students who have declared their major, which for undergraduate students who cannot change their major during their first year, might hinder their ability to graduate in four years. UW-Madison may have to create an individualized exemption process for

international students who need to take a course that is limited to students who have declared a particular major, which is an administrative burden.

57. UW-Madison anticipates needing to divert significant resources to International Student Services to handle the changes of the Final Rule, including hiring at least one new staff (international student advisor/DSO), spending an estimated more than one-hundred hours on training per staff member, DSOs having to review and confirm accurate I-94 data before determining a student's compliance/maintenance of status, supporting its students to file over 2,000 new EOS requests each year, spending $30,000 to update software systems, and spending time and money on legal consultation.

58. The six professional staff members in UW-Madison's International Faculty and Staff Services office have already invested roughly 300 hours of time since the Final Rule was published working towards compliance and supporting J-1 scholars who are impacted by the Final Rule. International Faculty and Staff Services will invest hundreds more hours of staff time before the Final Rule's effective date and will have more complicated ongoing compliance and advising responsibilities going forward.

59. UW-Madison offices beyond International Student Services and International Faculty and Staff Services will also have to build new systems to ensure compliance with the Final Rule.

60. At UW-Madison, domestic students generally retain broad autonomy to declare, change, or add academic plans and sub-plans in accordance with institutional academic policy. Students studying under F-1 status, however, must have those same academic decisions evaluated against requirements in the Final Rule. Because these determinations cannot reasonably or consistently be administered through human intervention alone, UW-Madison is effectively

compelled to develop sophisticated technical infrastructure capable of identifying affected students, evaluating immigration-related eligibility, preventing prohibited academic actions, generating appropriate notifications, and supporting ongoing auditing and compliance oversight. Accomplishing these objectives requires systems integration, new institutional data structures, automated validation logic, governance processes, testing, implementation, and long-term maintenance across multiple enterprise systems.

61. These are not discretionary enhancements designed to improve institutional efficiency; they are costly compliance mechanisms made necessary by the Final Rule. UW-Madison must dedicate significant financial resources, technical staff capacity, governance effort, and opportunity costs to redesign core student information system functionality that otherwise serves all students uniformly. The practical effect is that the Final Rule requires UW-Madison to maintain separate administrative and technical processes for F-1 students. The resulting costs—in technical development, implementation, governance, staff training, ongoing maintenance, and operational oversight—represent a substantial institutional burden imposed solely to administer federal immigration requirements that do not apply to the student population at large.

62. UW-Madison's International Student Services office has already had one Student Advisor/DSO resign and leave the field, and during their exit interview, they shared that relearning several aspects of their job in order to comply with the Final Rule was not worth the mental and emotional burden. One Manger/DSO is actively interviewing outside of field of international student services and has shared that the Final Rule is causing an unmanageable mental and emotional burden. This is causing a loss of institutional knowledge, creating additional workload burdens for remaining staff, and imposing costs related to recruiting, hiring, and training new staff.

63. UW-Madison will have to provide additional training to staff who process I-9 forms

to ensure compliance with federal I-9 regulations. The I-9 coordinators will need to know the correct program end date, when an extension of stay is timely filed, and be able to accurately determine the new work until date. Not every F-1 or J-1 will be granted an automatic 240-day extension of their work authorization with a timely filed EOS application.

64. Lack of timely communications from the Department of Homeland Security and the lack of updates to SEVIS are preventing our electronic compliance system (Terra Dotta) from updating the software as necessary to ensure compliance with the Final Rule. This will result in increased staff time to perform manual audits and creates compliance risk for UW-Madison.

65. These outlays would be unrecoverable and thus irreparable.

H. Financial harms

66. International students and scholars make significant contributions to UW-Madison through tuition, fees, housing, dining, and participation in athletic and research activities. These are significant sources of revenue which promote UW-Madison's financial stability and ensure its ability to offer the best services and programs to the campus community. Seventeen percent of UW-Madison's net tuition revenue comes from international students. Thirteen percent of university residence hall and family housing contracts are held by F-1 and J-1 students. International students also pay segregated fees to the university each semester that fund services used by all students. These services include University Health Services, student recreational facilities, child-care assistance, student union facilities (including dining options), student government, student organizations, and student city-wide bus passes.

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

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

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

I. Reputational harms

70. UW-Madison 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.

71. The Final Rule and the barriers it creates for F-1 students and J-1 scholars will impact current and future partnership agreements with international universities thereby harming exchange student mobility as well as the faculty, research, and innovation exchange. This also impacts our domestic students by hampering UW-Madison's ability to send its domestic students to the corresponding partner institutions. We expect the number of foreign exchange students (in the J-1 exchange visitor category) seeking to study temporarily at UW-Madison to decreases as a result of the Final Rule, which will cause a corresponding decrease in the number of domestic students UW-Madison can send abroad due to reciprocity agreements.

72. Presently, F-1 and J-1 students from 124 countries and J-1 scholars from fifty-seven countries are members of the UW-Madison community.

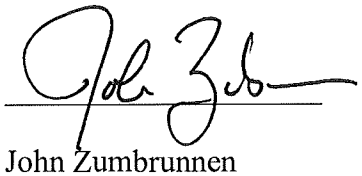
73. The Final Rule undermines international confidence in U.S. institutions of higher education, including UW-Madison. It communicates to people around the world, including prospective students and scholars and their families, that the United States is not welcoming to noncitizen students and that the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

74. In UW-Madison'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 UW-Madison's ability to recruit and retain academic talent, and ultimately to fulfill its research and educational objectives.

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

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

Executed on August 17, 2026, in Madison, Wisconsin.



John Zumbrunnen