SOCIETY for NEUROSCIENCE

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David J. Venturella
Acting Director
U.S. Immigration and Customs Enforcement
500 12th St., SW
Washington, D.C. 20536

Re: Comments on DHS Docket No. ICEB–2026–0100: Optional Practical Training Fees

Dear Acting Director Venturella,

Thank you for the opportunity to comment on the Department of Homeland Security's (DHS) proposed rule establishing an initial fee of $70,000 per F-1 nonimmigrant student Optional Practical Training (OPT) recommendation by a SEVP-certified institution, and an additional $30,000 for any subsequent OPT recommendations for the F-1 nonimmigrant student. While we recognize the goal of the proposed rule is to prevent any fraudulent activity to ensure program integrity, implementation of this rule will harm the U.S. biomedical research enterprise. As such, the Society for Neuroscience (SfN), the world's largest organization dedicated to advancing the understanding of the brain and central nervous system, strongly opposes the proposed rule.

SfN is committed to advancing biomedical research that drives innovation, improves public health, and maintains the U.S.' global leadership in scientific discovery. The proposed fees would effectively eliminate practical training opportunities for most international students and would significantly undermine the U.S. biomedical research enterprise and global scientific competitiveness. The proposed rule would inflict substantial harm on neuroscience research, higher education institutions, and diminish the nation's ability to attract and retain top scientific talent.

Our urgent concerns are outlined below, organized by specific sections of the proposed rule.

IV.A. Need for Rulemaking: Combating Fraud and Abuse of OPT
SfN supports efforts to maintain the integrity of the OPT program and agrees that instances of fraud and abuse should be addressed through effective oversight and enforcement. However, rather than focusing enforcement resources on bad actors, this proposal would impose substantial costs on all participants, including legitimate students, universities, research institutions, and employers. A fee of $70,000 would effectively render OPT inaccessible to the vast majority of international graduates, regardless of their qualifications or the legitimacy of their employment.

In neuroscience and biomedical research, international graduates contribute directly to federally funded research programs and often occupy highly specialized roles that are difficult to fill. For example, international graduates commonly support research teams studying Alzheimer's disease, Parkinson's disease, epilepsy, and other neurological diseases and disorders, as well as provide expertise in neuroimaging, computational neuroscience, biomedical engineering, and data science. Eliminating access to OPT for these individuals would impede scientific progress without materially addressing the fraudulent conduct identified in the proposed rule, thus threatening the U.S.' position as the global scientific leader.

If DHS determines additional oversight resources are necessary, more effective approaches would include enhanced employer verification and risk-based enforcement activities. These measures would address fraud directly while preserving the educational and research benefits of OPT.

IV.B. Need for Rulemaking: Protecting American Workers

DHS asserts that the proposed fees are necessary to protect American workers and reduce labor market impacts associated with the growth of OPT participation. SfN is concerned that the proposal overlooks the unique workforce needs of the U.S. biomedical research enterprise. According to a 2024 report from the National Science Board, foreign-born individuals comprise approximately 19 percent of the U.S. STEM workforce and 43 percent of doctorate-level scientists and engineers in the U.S.[1] These individuals play a critical role in conducting research, advancing innovation, and supporting the nation's scientific enterprise.

Neuroscience research increasingly depends on individuals with advanced technical expertise in fields such as computational modeling, artificial intelligence, and advanced imaging technologies. International students educated at U.S. institutions frequently possess these specialized skills and contribute directly to research that benefits public health, economic growth, and international competitiveness. In many neuroscience and biomedical research settings, OPT participants are not displacing U.S. workers. Rather, they are helping fill highly specialized research positions that are often difficult to recruit for and are essential to maintaining the pace of scientific discovery. Universities, research institutes, and biotechnology companies routinely report challenges recruiting individuals with expertise in advanced quantitative and technical disciplines.

Importantly, OPT participants in biomedical research are not merely filling jobs. They are contributing to scientific discovery and helping advance federally funded research initiatives. A neuroscience graduate working on a National Institutes of Health (NIH)-funded project investigating the mechanisms of neurodegenerative disease, for example, contributes to efforts that may ultimately lead to new diagnostics, treatments, and

[1] National Science Board. (2024). *Science and engineering indicators 2024: The state of U.S. science and engineering* (NSB-2024-3). National Science Foundation. https://ncses.nsf.gov/pubs/nsb20243.

therapies for patients across the U.S. Restricting access to this talent pool would slow research progress and reduce the return on federal investments in science.

The proposed rule could also exacerbate existing workforce shortages in research settings. Universities, research institutes, and biotechnology companies may face increasing difficulty recruiting and retaining individuals with specialized scientific expertise, resulting in project delays, reduced productivity, and diminished innovation.

IV.C Need for Rulemaking: Establishing the Optional Practical Training Fees

SfN strongly opposes the proposed establishment of a $70,000 fee for initial OPT authorization and a $30,000 fee for any subsequent OPT participation. While DHS states that these fees are necessary to fund oversight activities, combat fraud, and address labor market concerns, the proposed rule does not demonstrate that these amounts are reasonably related to the actual costs of administering, monitoring, or enforcing the OPT program. Instead, the proposed fees appear designed primarily to deter participation in OPT rather than recover programmatic costs.

The proposed fee levels are extraordinary by any measure and would effectively deny access to OPT for the vast majority of international students graduating from U.S. institutions. For students pursuing careers in neuroscience and biomedical research, these fees would often exceed annual salaries associated with entry-level research positions, postbaccalaureate and postdoctoral research programs, laboratory management positions, or other research-related employment. As a result, participation in OPT would become financially infeasible regardless of a student's qualifications, research contributions, or potential value to the U.S. scientific enterprise.

The proposed rule further suggests that high fees will ensure that only highly qualified students participate in OPT. However, the ability to pay a $70,000 fee is not a meaningful measure of merit, qualifications, productivity, or compliance. Highly qualified graduates conducting cutting-edge research in neuroscience and related disciplines may be excluded solely because of the proposed financial burden.

The proposal would also undermine the longstanding role of OPT as an educational and workforce development program. Many international students choose to attend U.S. universities with the expectation that they will have an opportunity to apply their education through practical training after graduation. The proposed fees would fundamentally alter the nature of the program by making participation available only to a small subset of individuals or employers able to absorb exceptionally high costs. This outcome would diminish the attractiveness of U.S. universities and research institutions relative to international competitors and reduce the nation's ability to recruit and retain top scientific talent.

Moreover, the proposed fee structure would have significant consequences for federally funded biomedical research. Research universities, academic medical centers, and

nonprofit research institutions frequently employ international graduates in positions supported by grants from the NIH, the National Science Foundation, and other federal agencies. These grants are awarded to advance scientific discovery, not to subsidize large immigration fees as proposed here. Consequently, laboratories and research institutions would likely be unable to absorb the costs, resulting in workforce shortages, delayed research projects, and reduced scientific output.

For these reasons, SfN urges DHS to withdraw the proposed OPT fee structure. The fees would impose severe and disproportionate burdens on students, universities, research institutions, and employers while undermining U.S. scientific global leadership and the biomedical research workforce.

Impact on U.S. Scientific Competitiveness

The U.S. has long benefited from its ability to attract outstanding students and researchers from around the world. OPT is an important component of that ecosystem, providing a pathway for international graduates of U.S. institutions to apply their training in ways that directly benefit American research and innovation.

Data from the National Center for Science and Engineering Statistics (NCSES) demonstrate that international graduates educated in the U.S. frequently remain and contribute to the nation's scientific workforce after completing their studies. Among temporary visa holders who earned U.S. science and engineering doctorates between 2017 and 2019, approximately 73 percent remained in the U.S. five years later. More than 32,000 doctorate recipients continued living and working in the U.S. in 2023, contributing their expertise to research institutions, universities, industry, and government.[2]

The proposed fees would send a strong signal that international talent is less welcome in the U.S. and would incentivize students to pursue education and employment opportunities in competing countries. This would weaken the ability of U.S. universities and research institutions to recruit top talent and could undermine longstanding federal investments in science, technology, and biomedical research.

Recent higher education data further indicate that the pipeline of future scientific talent is already under strain. Research universities reported a 21 percent decline in international applications to doctoral programs for fall 2026 and a 17 percent decline in international doctoral admissions compared with the previous year.[3] The continued attractiveness of U.S. research institutions to international students is therefore not guaranteed. Additional barriers to post-graduation training opportunities, such as the proposed OPT fees, risk

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[2] National Center for Science and Engineering Statistics. (2025). *Most U.S.-trained science and engineering doctorate recipients on temporary visas remain in the United States* (NSF 25-325). U.S. National Science Foundation. https://ncses.nsf.gov/pubs/nsf25325

[3] Miller, E., & Smith, T. (2026, July 7). *New PhD admissions data show threat to U.S. STEM workforce, breakthroughs, innovations*. Association of American Universities. https://www.aau.edu/newsroom/new-phd-admissions-data-show-threat-us-stem-workforce

further reducing the nation's ability to recruit and retain highly qualified researchers and innovators.

Many international trainees who begin their U.S. careers as students later become principal investigators, faculty members, entrepreneurs, and industry scientists whose contributions drive domestic scientific advancement and economic growth. Restricting access to OPT risks diverting future innovators away from the U.S. and weakening the talent pipeline that has long supported American leadership in science and technology.

For neuroscience specifically, continued progress in understanding the brain and developing therapies for neurological and psychiatric diseases and disorders depends on attracting and retaining the most talented researchers from around the world. Policies that significantly reduce participation in OPT threaten the scientific workforce necessary to address some of the nation's most pressing health challenges.

Conclusion
SfN has outlined serious concerns with this proposed rule and strongly opposes it being finalized. While SfN supports efforts to address fraud and ensure program integrity, the proposed fees are disproportionate to the stated objectives and would have significant unintended consequences for scientific research, higher education, and U.S. competitiveness. The proposal would substantially reduce access to top scientific talent, impede biomedical research, and weaken the nation's innovation ecosystem while failing to directly target the sources of fraud identified by DHS. For these reasons, SfN respectfully urges DHS to withdraw the proposed rule in its entirety. Please contact SfN's Director of Advocacy and Training, Adam M. Katz, at akatz@sfn.org, with any questions.

Sincerely,



Diane Lipscombe, PhD
Chair, Government and Public Affairs Committee, SfN