

**EXH. 11**  
**DECL. OF BETH INGRAM**  
**(NORTHERN ILLINOIS UNIVERSITY)**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

COMMONWEALTH OF MASSACHUSETTS,  
et al.,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY, et al.,

*Defendants.*

Civil Action No.

**DECLARATION OF BETH INGRAM, NORTHERN ILLINOIS UNIVERSITY**

## **DECLARATION OF BETH INGRAM**

I, **BETH INGRAM, PH.D.**, pursuant to 28 U.S.C. § 1746, hereby declare and affirm,

1. I am the Executive Vice President and Provost at the Northern Illinois University (“NIU”) located in DeKalb, Illinois. My educational background includes a Ph.D. in Economics from the University of Minnesota. I have been employed as Executive Vice President and Provost since May 16, 2019.

2. I submit this declaration in support of Illinois’s litigation challenging the policies announced on July 6, 2020 by “Broadcast Message” and to be published as a Temporary Final Rule to amend requirements of the Student and Exchange Visitor Program (“SEVP” or the “Rule”).

3. I have compiled the information set forth below through personal knowledge and NIU personnel who have assisted me in gathering this information from our institution. I have also familiarized myself with the Rule in order to understand its immediate impact on NIU.

### **Background on Northern Illinois University (NIU)**

4. NIU is a public high research doctoral university with a total student enrollment of approximately 17,000 students.

5. The Board of Trustees of Northern Illinois University is the governing body at NIU and NIU receives approximately \$90 million dollars from the state of Illinois.

6. In addition to a total student enrollment of approximately 17,000 students, NIU employs approximately 3000 employees, and offers over 100 undergraduate programs across 7 colleges [Business, Education, Engineering and Engineering Technology, Health and Human Sciences, Law, Liberal Arts and Sciences, and Visual and Performing Arts], and contributes over \$600 million dollars in economic output to the regional economy.

7. In Spring Semester 2020, NIU had approximately 800 enrolled students who have F-1 visas. These students come from 78 countries and contribute \$12,000,000 in tuition and fees to NIU.

8. Of these students with F-1 visas approximately 530 are currently in the United States.

9. NIU has approximately 300 newly admitted students for enrollment in fall 2020 who will require F-1 visas. Of these students, approximately 10 are currently in the United States and approximately 290 are currently living outside the United States and require a visa to enter the country for study. These students are expected to contribute \$4,500,000 in tuition and fees to NIU.

#### **[Economic Harm to NIU]**

10. Incoming international students may no longer choose to enroll and continue if they cannot study from within the US.

11. Current international students may withdraw out of fear of losing their F-1 visas or the ability to obtain CPT/OPT work visas.

12. Under the newly revised rules, universities cannot allow the students to continue their studies if their learning is remote, but many international students cannot leave the United and safely relocate to their home country to study remotely.

13. A significant drop in international student enrollment will have a negative effect on NIU's finances, in the form of lost tuition, housing and dining revenue, and other on-campus services.

14. This is particularly acute to NIU because international students are often full payers of out-of-state tuition, which impacts revenues and is a loss of financial aid resources for other students.

**[NIU's Potential Administrative Burdens and Planning Disruptions]**

15. NIU plans to offer a hybrid learning model in the fall semester, which includes a combination of in-person and remote learning.

16. To comply with the complexity of implementing a new system to comply with the amended requirements of SEVP is a significant administrative challenge.

17. NIU may need to make individualized determinations to certify international students before enrolling them for the semester.

18. NIU may need to develop new procedures and dedicate staff and resources to re-issue I-20s for each student.

19. NIU faculty may need to re-evaluate courses to make sure that international students can meet the standards for hybrid learning.

20. NIU will face challenges to remain in compliance with the new Rule if the university is forced to change from a hybrid learning system to a fully online instructional model at some point during the semester.

**[Harmful Impact on NIU's Educational Mission]**

21. As a doctoral research university, NIU would be adversely impacted by losing international students from its important research programs.

22. NIU Students' inability to engage in lab work and research will have a negative effect on not only on the students' education, but also the amount of research work that NIU can conduct in the labs, as a result of fewer international students available to work in the labs.

23. The new Rule may cause professor-student communications and collaboration to be severely impacted.

24. The new Rule may cause a loss of interaction with and learning with other NIU students, attending talks, especially in doctorate programs, because of the time zone challenges of international students being forced to remain in their home country,

25. Under the new Rule, NIU international students forced to remain in their home countries would lose the opportunity to be involved in campus life – clubs, organizations, sports, and other important social interactions, as well as the loss of opportunity to improve/attain English language fluency.

26. Under the new Rule, NIU international students forced to remain in their home countries would miss out on the student experiences that are fundamental to the college experience and overall student development.

#### **[Economic Harm to NIU Students and the State]**

27. The new Rule could cause NIU international students that lose their visas: e.g., losing F-1 status and losing the ability to obtain work visas could cause students economic harm and an undue hardship to accumulate the necessary funds to pay for tickets back to their home country and in some cases, secure funds to find housing in their home country.

28. Illinois has one of the largest out migration of college graduates to neighboring states.

29. Under the new rule, if international students lose their visas and the ability to work, Illinois would lose a significant talent pool of workers for state industries in STEM and other growth-related fields.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11<sup>th</sup> day of July, 2020

A handwritten signature in black ink that reads "Beth Ingram". The signature is written in a cursive style with a large, looped initial "B".

Beth Ingram, Ph.D.  
Executive Vice President and Provost  
Northern Illinois University