

EXH. 26
DECL. OF KATHERINE S. NEWMAN, PH.D.
(UNIVERSITY OF MASSACHUSETTS)

**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 KATHERINE S. NEWMAN, Ph.D.

I, Katherine S. Newman, hereby declare and affirm,

1. I am the University of Massachusetts (“UMass” or “University”) System Chancellor for Academic Programs and Senior Vice President for Economic Development, and the Torrey Little Professor of Sociology at UMass Amherst. UMass is a public land grant university with five campuses: four general campuses in Amherst, Boston, Dartmouth, and Lowell, Massachusetts; and the Medical School in Worcester, Massachusetts. My duties as System Chancellor for Academic Programs include oversight of the University’s academic programs, the offices that serve and support students, and the offices that support and promote the University’s many international associations and opportunities for both students and faculty.

2. From 2018 to 2020 I served as Interim Chancellor of UMass Boston. From 2014 to 2017 I served as Senior Vice President for Academic Affairs and Provost of UMass Amherst. I have worked in higher education for the past 41 years, serving in both faculty and administrative roles at private and public universities. I obtained a Ph.D. in Anthropology from

the University of California, Berkeley, and a B.A. in Philosophy and Sociology from the University of California, San Diego.

3. I submit this declaration in support of the multistate litigation by Massachusetts and other states challenging the policies of the Department of Homeland Security (“DHS”) announced on July 6, 2020 by Broadcast Message to amend requirements of the Student and Exchange Visitor Program (“July 6 Directive”). I have compiled the information set forth below through personal knowledge and UMass personnel who have assisted me in gathering this information from our system, including the five UMass campuses. I have also familiarized myself with the July 6 Directive in order to understand its immediate impact on the University system.

The University System and Its Reliance on International Students

4. The University of Massachusetts is the Commonwealth’s premier public research university system. At any given time, it is responsible for undergraduate and graduate education of some 75,000 students and graduates nearly 18,000 students annually. The University system has an annual budget of \$3.5 billion and is the third largest employer in the state, with 24,000 workers. UMass not only contributes \$684 million in annual research and development to the economy of Massachusetts, but also contributes to its well-recognized status as the best educated and most technologically innovative state in the country.

5. Our international students hail from approximately 115 countries and seek Bachelors, Master’s and Doctoral degrees in all fields. A significant proportion remain to pursue Optional Practical Training (OPT) in industries, non-profits and government agencies within the state and around the country. Across the UMass system, 50-60% of the students enrolled in Master’s programs in Engineering and Computer Science hail from China and India. In the

University of Massachusetts Medical School, the only public school of medicine in the Commonwealth, 30% of its Ph.D. students in its Biomedical Sciences doctoral program are international students. These students are active contributors to the research labs on the forefront of solving the COVID19 crisis, not to mention the thousands of other biomedical problems to which they apply their talents.

6. At present approximately 7,200 of UMass students are F-1 visa holders. Of these, 1,659 undergraduate and 2,031 graduate students hold F-1 visas and remained in the United States during the Spring wave of the COVID19 pandemic, for a total of 3,690; 152 transfer students hold F-1 visas. There are approximately 2,253 continuing students (1,606 undergraduates and 647 graduate students) on F-1 visas who left the United States during the Spring wave of the pandemic and are currently abroad. Of the new international students accepted to the University, 2,504 international students are awaiting visas and intending to enroll, while 270 were in the United States during the Spring wave (attending domestic high schools).

Efforts to Respond to the COVID19 Pandemic and Reliance on DHS's Prior Policy

The Spring and Summer Response to the Pandemic

7. Our five campuses expended enormous resources to adapt to the problems imposed by the pandemic. In Spring 2020, based on the policies enumerated for the Student and Exchange Visitor Program (SEVP) on March 9 and 13, our five campuses shifted instruction and services (including advising, financial aid, libraries, health care) to remote modality. During that time, as required by the March 13 SEVP guidance, the University campuses submitted procedural changes in its programs to DHS.

8. We relocated the vast majority of our on-campus residential students off-campus (to their family homes or other locations), leaving only those with no other options in our dormitories, including international students who could not return to their countries of origin. Those remaining were provided with boxed meals, extra cleaning, and socially distanced supervision.

9. Every campus invested in new technology to support student learning. This included Zoom licenses, new software, electronic course materials accessible on Blackboard, and remote training for faculty. Some campuses developed new programs to support students at risk (such as low-income, first-generation, under-represented groups, single parents, students suffering from unemployment) with additional advising, emergency financial aid, tutorial assistance, and mental health counseling.

10. Faculty members reorganized their courses to accommodate distance learning. Some “flipped” their classrooms, recording lectures on Echo 360 that students could watch at home, converting “classroom” time to discussion via Zoom or another technology. New assignments more congenial to distance learning had to be developed, as did new security systems for examinations. Researchers departed from their labs and devoted themselves as far as possible to data analysis, publication, grant writing, distance meetings of their lab groups, and 1:1 supervision of graduate students. This investment in a new form of higher education consumed countless hours of effort which will now be relied upon in the Fall.

11. Most campuses have either limited or suspended traditional student activities on campus, from athletics to student government, but created electronic forums where many of the same services and operations will be offered. The libraries are operating remotely and some have developed curb-side pickup operations for book and journal circulation. Athletics programs

have created wellness courses and self-guided exercise routines. Advising, mental health services, and financial aid are all provided through a telecommunications operation that worked well last Spring. Our residence halls are open, although under limited capacity to promote social distancing. Students will generally not be able to eat in the usual cafeteria settings, but rather will dine in their rooms. Rooms on some campuses are now single occupancy only, while others have limited multiple occupancy, to reduce risk of infection. For the upcoming Fall 2020 term, students will be asked to sign agreements acknowledging that they are expected not to entertain visitors, they are to wear masks at all times outside their rooms, and that they understand that common areas are closed off. For many, including our international students, this still represents the best housing option and the most congenial way to accommodate their studies.

Fall 2020 Planning

12. To prepare for campus operations in Fall 2020, facilities and public safety departments created protocols for restricted campus access and management of social distancing, as well as planning for a variety of scenarios for summer session and fall semester courses. Transportation systems were reconfigured. Contact tracing and testing regimes were evaluated and put into place, managed largely via telemedicine and in collaboration with local public health authorities. The administrations on all campuses stood up planning groups to implement public health recommendations for essential research, especially those working on COVID19 related topics, such as vaccine development, innovations in testing, and fabrication of personal protective equipment (PPE).

13. In reliance on the prior SEVP regulations, our university campuses began a complete overhaul of their FY 2020 budgets and new projections/plans for FY 2021, all of which envisioned a catastrophic level of revenue loss. However, at no time did we assume these

COVID19 circumstances would be compounded by the potential loss of our international students. Indeed, we assumed we should plan for their education and research needs in the same way we do for all of our students.

14. The academic calendar varies across campuses. For instance, the first day of classes at UMass Amherst is August 24, 2020, with classes ending before Thanksgiving to avoid the flu season with students in place. Other campuses will adhere to the normal calendar, commencing after Labor Day and ending the Fall term in mid-December.

15. For the fall semester, the University's medical school will bring all of its students back on campus given the nature of the education, training, and patient care they provide. The four general campuses of the University fall into the category of "hybrid" learning with varying mixes of remote and face-to-face education. We plan to "de-densify" all courses that are held on ground, which means room capacity of about 35% of normal. The Boston and Amherst campuses are on the high end of reliance on remote learning, while Lowell and Dartmouth plan more face-to-face interaction. Every campus is providing for on ground classes when the facilities are critical to learning (especially nursing, lab science, and performing arts) where face-to-face instruction is irreplaceable. Some aspects of their curricula will be offered via remote modality, even if their residence halls house a proportion of their students. Those students will be logging on to online/remote classes from their dorm rooms, while their counterparts off campus will do so from their residences, wherever they may be. This will be particularly important for large introductory classes that cannot maintain a social distancing regime of six feet and hold students together in a lecture hall. Classrooms that normally accommodate 300 students cannot expand enough to provide six feet between them. All other services normally

provided to students (including advising, information technology, financial aid, and registrar) will be maintained remotely and delivered minimizing face-to-face contact.

16. Many of these plans are designed to be flexible, allowing students to shift between in-person and remote learning depending on the trends of the virus, outbreaks on campus, and specific factors for individual students, such as illness, exposure to COVID19, or underlying health conditions that make them vulnerable to infection. Given our experience in the Spring semester 2020, we realize we may need to completely disband on campus classes and student residence with little warning in the Fall and have prepared for that possibility in order to minimize the disruption of our educational and research mission.

17. The University campuses have taken into account particular population vulnerabilities and risks of exposure in its decisions regarding Fall 2020 instruction. For instance, our urban campuses, especially UMass Boston, have a high proportion of African-American and Latinx commuting students who live with their families in dense, inter-generational settings. They ride public transit to and from the campuses. We are mindful of the responsibility we have to avoid becoming an infection vector when the families and communities on the other end of the campus commute are vulnerable. Also, the higher education workforce—especially the senior faculty—skews toward older age groups. These demographics place our workforce at greater risk of harm from COVID19 infection and we must be careful to protect it.

18. We have arrived at decisions regarding Fall 2020 instruction carefully, with the best health and safety interests of our students, faculty and staff in mind. We have also benefited from outreach to and expertise of public health officials and medical experts to assist us in considering our options and developing and implementing plans. It is our judgment, informed by what we have been told by public health officials at all levels, that the pandemic remains a

serious threat to health and safety and that these measures are necessary for the University's preparedness in the face of this threat.

The Administrative Burdens and Planning Disruptions Caused by the July 6 Directive

Academic and Operational Planning

19. If we have to quickly stand up additional classes to adapt to the new rules described in the July 6 Directive, we will face massive reorganization of our teaching schedules and personnel, registration of students and changes in their programs. This would come at a time when execution is made more difficult by staff working remotely. It is hard to overestimate how burdensome this will be at such a late date; curriculum is generally set by April of the prior academic year.

20. The new scheme would require us to pull our faculty off of the planning they are doing right now to improve their remote instruction for the Fall and ask them instead to ensure that we have on-campus courses for international students in F-1 visa status who are currently residing in, or plan to enter, the US for the fall term. Even determining exactly who that is, as well as what course work can be economically provided that fits with thousands of individualized programs, is a huge burden and perhaps not possible for all students.

21. Most of our campuses have been devoting effort to preparing classes for international students stranded overseas by numerous worldwide travel restrictions, lack of flights, Department of State suspension of visa processing, and quarantine requirements once in the US. We are trying to make sure their progress to degree is not impeded, by creating online and remote classes that match the time zones where they are now. If we have to add to this the creation of on-campus courses for international students who will otherwise be deprived of their education, thousands of hours of manpower on the academic side of the house will be redirected

away from the current planning efforts for Fall 2020. Additionally, continuing international students who left the US during the pandemic and remain abroad will not be permitted to maintain their F-1 immigration status for the Fall term.

22. If we have to quickly stand up additional classes to adapt to the new rules described in the July 6 Directive, we will also have to develop an entirely new operational scheme intended to re-introduce as many as 7,200 students back to physical spaces on campus large enough to maintain social distancing. This will require adjustments in transportation services, cleaning regimes and staffing, campus signage, COVID19 testing, personal protective equipment, and myriad other changes. Supporting hybrid learning above and beyond what we have already planned, in order to implement this new scheme, will generate utility costs at least in the tens of thousands of dollars because our campuses will have to reopen buildings that have been shuttered since March.

Administrative Support

23. Under the July 6 Directive, the University must issue new Forms I-20 to each international student, with certifications unique to that student, by August 4, 2020. This will require school officials to expend time and resources to make an individualized determination of the particular forms of instruction offered by the degree program in which each student is enrolled, but also a determination of each individual student's course load and the format in which such courses will be taught—the latter of which may not be information readily available to the school officials preparing the certifications. Indeed, it may not be possible to complete the necessary certifications regarding each student's course load and which classes will be "online," as many students have not yet registered for classes, and indeed (as per usual) have the opportunity to add and drop classes well into the semester. The University will also have to

query all international students to assess their intended plans for travel to the US (if possible) and their academic intentions to begin, resume or defer in Fall semester. Such assessment will be exceptionally labor-intensive and will result in a large variety of individual and variable advising challenges (i.e., one size does not fit all regarding advising).

24. Re-issuing new Forms I-20 will require school officials to communicate directly with thousands of international students enrolled on their campuses which would be a monumental organizational challenge in such a short time frame.

25. Even if we had an army of staff with nothing else to do—and manifestly we don't—coordinating this massive administrative effort would be a challenge. In fact, many of our campuses are simultaneously managing mandatory staff furloughs and reductions in operational expenditures in response to the financial constraints brought by COVID19. In addition, committing resources needed for other critical operations in order to obtain such information in compliance with the July 6 Directive would result in losing opportunities to serve the international student body in other meaningful ways.

26. Compounding this burden is the urgent and time-sensitive nature of the July 6 Directive and its potential negative effect on pending student visa appointments and/or entry to the US, which may precede the August 4, 2020 deadline and the completion of a new Form I-20.

Ancillary Costs to Support Hybrid Learning

27. Reassigning faculty during a period when they are technically in “non-service” status (as nine-month employees who do not work in the summer months in accord with pertinent collective bargaining agreements) and arranging for them to teach classes they weren't supposed to offer, will wreak havoc with our fall term plans and result in substantial additional costs.

28. Supporting hybrid learning above and beyond what we have already planned will also increase the level of health risk on our campus, as a result of welcoming more students, faculty and staff back to campus. The potential costs of this increased risk are incalculable.

29. Should the pandemic flare up again in Massachusetts, we have to be able to disband the campuses and send students away into a fully remote modality, and we are prepared to manage such a situation and continue to produce a world-class education. If we were to do so, however, the July 6 Directive would require that numerous students leave the country—during a time when travel is dangerous and perhaps impossible—or that they disenroll from their courses of study and fall out of immigration status.

The Effects of the July 6 Directive on International Student Enrollment

30. The July 6 Directive would foreseeably reduce the enrollment of international students in a variety of ways: students may choose to withdraw if they cannot study from within the US or abroad; students may withdraw if they lose their F-1 immigration status and lose the ability to obtain CPT/OPT work visas; new students may fail to matriculate if they are denied a visa or entry into the US; students may transfer to another US institution if they risk losing their F-1 status by studying at our University; students may be unable to participate in remote instruction from their countries of origin.

31. Arranging transfers at this point in time—literally weeks before the opening of the Fall semester—is simply not possible. Our admissions applications for freshmen were due in January and decisions were sent out in March and April. First year students settled on their destinations by May 1 for some campuses and June 1 for others. Transfer students have also largely settled on their destinations by now. It would be highly unusual for students to begin an application process in August since they would be within weeks of starting classes. Practically

speaking, if the campuses cannot assure a quality education to international students, we will most likely lose them. They will—if they are able to—go home.

32. The ability of the University's vast and complex research programs to maintain the excellence for which they are known depends on attracting and recruiting top-tier international talent. In many domains, other countries (including Canada, Australia, China and the countries of the European Union) are simultaneously looking to draw the same people. If international students come to believe that their lives with us will be insecure, their ability to realize their investments in higher education unclear, it will not be long before they seek other places to develop their innovations.

33. Even if the July 6 Directive were to apply to and be in force in some states, but not in Massachusetts, this would still foreseeably reduce our enrollment of international students. This would happen in at least two ways. First, uncertainty, unevenness and imprecision in the application of immigration laws have a deterrent effect on students' decisions to come to the University for higher education. If, for instance, a competitive student plans to travel to Massachusetts this Fall, but his travel plans take him through a state for which the July 6 Directive applies, he may not feel certain that his F-1 visa will be accepted by immigration officials reviewing his papers, and may choose to study in another country altogether. Second, uneven application of the July 6 Directive could have severe impacts on international students' households, which may likewise lead to them to disenroll. For instance, if a University graduate student studies in Massachusetts, but her spouse is a graduate student in another state in which the July 6 Directive applies and cannot obtain an F-1 visa under the July 6 Directive, the Massachusetts student will be separated from her spouse unless she disenrolls from the University and leaves the country.

The Effects of the July 6 Directive on the University's Educational Mission

34. Because the July 6 Directive would have the effect of disenrollment of some students and disallowing others to pursue their studies from within the United States, it would cause serious harm to the University's educational mission.

35. *Experimental fields:* Thousands of international students, especially at the graduate level, are enrolled in programs that require extensive experience with laboratory-based discovery, field research, and experimental work. These experiences are integral parts of their training and require a physical presence to pursue. This is why the first people to return to our campuses under strict public health regulation were the scientists, medical researchers and their graduate students. In the same vein, our research faculty, who hold major federal grants worth over \$600 million system wide, depend on the work of graduate assistants in their labs. Such faculty promise the granting agencies a particular pace of accomplishment, which would be threatened by a reduction in international students, especially in the STEM fields. For those instances in which such experimental work does not qualify as part of students' in-person requirement for purposes of the July 6 Directive, and if students can no longer participate in research under the direction of faculty because they are denied F-1 visas under the July 6 Directive, both they and the research faculty's programs would be irreparably damaged.

36. *Teaching/instructional support:* International students typically support themselves on campus with research and teaching assistantships. The income is vital to them; the teaching and research support are vital to the university. Without this labor, our undergraduate courses for domestic students would be imperiled. Large lecture courses (300 students is not unusual) only work well when they are subdivided into discussion and lab sections. The instructors for them are often graduate students, many of whom are international

students. We would not be able to replace these assistants with others at this late date or, even worse, in the middle of the semester.

37. *Dilution of the international student presence in the student body:* Our campuses pride themselves on diversity, a key source of vibrant student life which is, in turn, an important part of the educational mission. International students provide domestic students with perspectives and lived experience that are critical to the development of well-rounded and knowledgeable graduates of the University. Clubs, organizations, sports, and the vital interpersonal nature of informal campus life will be adversely impacted by the absence of our international students, especially when travel opportunities and the traditional “study abroad” option has been curtailed by the pandemic.

38. *Loss of English language proficiency:* International students often find it difficult to develop the level of mastery in English necessary to pursue their studies and complete their degree when they are in their countries of origin. Their proficiency improves by leaps and bounds after they arrive in the US and begin to communicate routinely with English speakers. If because of the July 6 Directive they lose their F-1 visas, they lose the opportunity to obtain the English language proficiency that comes from residing on or near their campus in the US.

39. *Loss of English language training program students:* The July 6 Guidance requires all international students in English language training programs to attend exclusively in-person classes in order to maintain their immigration status. The University has robust English language training programs, including at its Boston campus. If UMass Boston cannot safely conduct fully in-person instruction for such classes at the beginning of Fall 2020, the students in these programs will be unable to enroll altogether. Not only will the campus lose the students’ contribution to campus life, but the University system will lose essentially entire programs, with

the revenue and academic contributions that the programs make. Additionally, this will impact our international pathway students who are preparing to enroll in degree-seeking programs.

The Financial Effects of the July 6 Directive on Students

40. *Transfers:* International students cannot simply pick up their bags and transfer to universities that are fully “on ground.” Universities are not that interchangeable: each has its own academic requirements, capacity to take in transfer students, distribution of openings in particular fields, financial limitations on student aid, and housing availability. Students are not going to be able to pick up in one place and land in another without losing years of investment in the degrees they have been working toward. Even if they could, at least within Massachusetts, the gap between the tuition we charge in the public sector and the price tag of our sister institutions in the private sector is nearly double and sometimes more. Many students facing a requirement to transfer will not be able to afford it and the potential receiving institutions have experienced their own hardships of late and are not awash in extra financial aid resources.

41. *Loss of F-1 Immigration Status:* Students who have lost their immigration status would have lost their I-20s, and would need to reapply and pay the I-901 SEVIS fee to DHS, which currently costs \$350. Special attention would be needed for students from countries currently restricted from visa issuance and/or entry into the US by Executive Order or Presidential Proclamation. While not all citizens face bans to entry, due to F-1 status examination, they will undergo added scrutiny and the possibility that they would be denied re-entry and hence denied the opportunity to complete their degrees.

42. *Loss of OPT Visas and Related Work Opportunities:* Many international students are attracted to study in the US as preparation for work opportunities available to them via OPT. The loss of these options is almost incalculable because entry into the US labor market

represents a chance to gain experience in cutting edge industries and advance practical skills that augment classroom learning. Whether those pathways ultimately lead to elevated positions in the US, prepare a student for a robust career in their country of origin, or take them somewhere else entirely, the OPT opportunity is a critical stepping stone to a high skill profession. Across UMass, the annualized full-time salary that is given up by international students who are participating in an OPT program would most likely total over \$77 million (based on the 1,247 students who had an OPT application filed within SEVIS and whose program was active at some point within the 2018-2019 academic year).

43. *Costs Associated with Abrupt Transition and Loss of Housing:* Students have made plans relating to course work, travel, and housing, among other things. The financial burdens on a student who is unable to continue a course of study at the University as a result of the July 6 Directive are considerable. I estimate that the total expenses for relocating to another university in the US would be \$5,284, based on the following: fees for applying to three other institutions for transfer of approximately \$150 (\$50 each); transcripts and mailing expenses of approximately \$50 total per person; reapplication costs for I-901 and I-20 processing of \$350; moving expenses to depart campus and relocate within 250 miles of approximately \$1,500; and short-term housing costs of \$3,234 (at \$1,078 per month for three months). Summing these costs, our 7,200 international students could face internal relocation expenses totaling approximately \$38 million. If a student has to leave the country unexpectedly and pays \$3,000 for a one-way international airfare on short notice, then collectively, approximately 5,000 of 7,200 international students in the U.S. for fall term could face \$15 million in the cost of flights alone.

The Economic Effects of the July 6 Directive on the University System

44. We rely on the revenue that international students' tuition contributes to the financial stability of the University. International students are charged significantly higher tuition than Massachusetts residents, hence the loss of every F-1 student equates roughly to the loss of four in-state students, measured by tuition dollars. The delta between these rates contributes in powerful ways to the ability of the university to provide for financial aid in support of the daughters and sons of the Commonwealth. If the roughly 7,200 undergraduate and graduate students overall were to leave UMass, we would lose approximately \$8.9 million in revenue that would be earmarked for in-state student financial aid. While UMass remains, and always will be, an institution that serves the children of our home state, it would not be possible to do as much as we do for them if the tuition revenues diminish. In this, we mirror the trends across the country, where the financial stability of four-year public universities depends on continuing to attract international and out of state students.

45. In a period when the financial fabric of the University has been worn away by the impact of the COVID19 pandemic, the last thing we can deal with is the loss of this revenue stream. We are already reeling – as are many industries – from losses associated with the need to refund room and board to our students who had to leave campus in the Spring of 2020, from the increased need for financial aid in the wake of rising unemployment among the parents of our students, and from enrollment fluctuations engendered by the pandemic. These losses are creating tremendous pressures to cut costs in an industry that is already quite “close to the bone.” The loss of international students, especially given their outsized contributions as tuition payers, will add to the unraveling of our basic revenue stream. This could not come at a worse time for the University of Massachusetts.

46. The University would stand to lose a massive amount of revenue if students are denied visas or were sent out of the country (or to another university). If all current F-1 students were to withdraw: nearly \$69 million would be lost from our tuition revenues; more than \$5 million would disappear from our housing revenue stream; more than \$6 million would be lost from our dining revenues. Our total revenue losses would amount to approximately \$80 million.

47. The University would incur additional instructional expense if we have to stand up new courses to comply with the SEVP guidance. This will be a major organizational problem because our curriculum is generally set by April of the prior academic year. But if we restrict attention just to the financial impact, we are looking at incremental instructional costs of \$1.7 million.

48. One of our campuses estimated its operational costs of additional instruction (from classrooms, utilities, materials, cleaning and personal protective equipment) at \$150,000, which is a reasonable projection. If the other three general campuses experienced similar costs, this would amount to \$600,000.

49. The total impact (revenue plus additional expenses) would therefore be approximately \$82.3 million.

50. In addition, across the system, nearly 1000 student workers would be lost from the ranks of our employees. This would be a loss of talent we would need to replace.

The Economic Effects of the July 6 Directive on Massachusetts

51. The 2019 economic impact of what was then approximately 71,000 international students on the Massachusetts economy was estimated as \$3.2 billion according to the National Association of Foreign Student Advisors economic impact tool. <https://nafsa.org/policy-and-advocacy/policy-resources/nafsa-international-student-economic-value-tool-V2>. That spend

supported nearly 39,000 jobs in the Commonwealth.

52. International students spend a great deal of money in the towns and regions around our five campuses. They rent apartments and houses from local landlords; purchase food from grocery stores, restaurants and retail outlets; attend events from sports to concerts. For instance, District 2, where the Amherst flagship campus is located, is home to some 7,800 international students from all of the local universities, where they contributed \$289 million to the economy and supported nearly 3,700 jobs in 2019. A precipitous loss of international students would be very damaging to Western Massachusetts at a time of severe economic disruption caused by the pandemic.

53. Three of our four general campuses are located in regions with a high density of immigrants. International students participate in the life of the ethnic communities across the state, especially those formed by immigrants from their native countries. Those who remain in the state, either on OPT visa extensions, as green card holders or naturalized citizens, join our local communities and their tax dollars help to support schools, industries, and neighborhoods.

54. Our most innovative industries would experience disturbing disruption if international students leave or are prevented from coming to the University. International students that transition to the Massachusetts workforce after graduation, for instance, through OPT opportunities, provide a powerful source of innovation, creativity, and prosperity.

55. All institutions of higher learning benefit from the unfettered ability to attract the “best and the brightest.” We exist to educate and train the next generation, as well as thousands of adult learners in hundreds of fields. Our students contribute to the economic vitality and social well-being of the state and the nation. We should rejoice that they are eager to stay the

course and remain at the University of Massachusetts through a pandemic that has enforced isolation in the name of public health and in the interests of their own futures.

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

/s/ Katherine S. Newman
Katherine S. Newman, Ph.D.
*University of Massachusetts System Chancellor for
Academic Programs and Senior Vice President for
Economic Development*

Executed this 12th day of July, 2020