

**EXH. 33**  
**DECL. OF D. SCOTT PIERSON**  
**(UNIVERSITY OF WISCONSIN – STOUT)**

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

COMMONWEALTH OF MASSACHUSETTS, et.  
al.,

*Plaintiffs,*

v.

Civil Action No. \_\_\_\_\_

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY, et. al.,

*Defendants.*

**DECLARATION OF D. SCOTT PIERSON**

I, D. Scott Pierson, pursuant to 28 U.S.C. § 1746, hereby declare and affirm,

1. I am the Director of the Office of International Education at the University of Wisconsin – Stout located in Menomonie, Wisconsin.
2. I submit this Declaration to verify publicly available information regarding UW Stout’s current enrollment statistics and practices and procedures affected by July 6, 2020’s “Broadcast Message” and to be published as a Temporary Final Rule to amend requirements of the Student and Exchange Visitor Program (the “Rule”).
3. I have compiled the information set forth below through personal knowledge and University of Wisconsin – Stout 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 the University of Wisconsin – Stout.

**Background on UW Stout and International Student Population**

4. The University of Wisconsin – Stout (UW Stout) is a public comprehensive university with an enrolment of approximately 8,390 students (fall, 2019 data).

5. UW-Stout currently has 97 enrolled students who have F-1 visas. These students come from 27 countries and contribute approximately \$2,690,896 in tuition, housing fees, etc. to University of Wisconsin-Stout. Of these students with F-1 visas, 67 are currently in the United States.

6. UW-Stout has 47 newly admitted students for enrollment in fall 2020 who will require F-1 or M-1 status. Of these students, 1 is currently in the United States and 46 are currently living outside the United States and require a visa to enter the country for study. These students are expected to contribute approximately \$1,497,842 in tuition, housing fees, etc. to UW-Stout.

#### **Economic Impact to UW Stout**

7. I expect 29 students might disenroll if their F-1 visa status is revoked as a result of the Rule. Disenrollment would have a negative financial impact of approximately \$528,496 in lost tuition, \$136,126 in lost housing revenue, \$87,696 in lost dining and live expenses, and \$54,696 in other on-campus services.

8. This is particularly acute because international students are often full payers of out-of-state tuition, paying 214% more than the in-state tuition rate, and the additional revenue they provide assists our university in subsidizing the cost of services and provides much needed financial aid.

#### **The Rule's Impact on Current Planning Efforts**

9. UW-Stout transitioned from in-person delivery of courses to alternative delivery methods for all courses during the spring 2020 term. Alternative delivery methods continued

during the summer 2020. This transition was in alignment with the SEVP's March 2020 guidance, and UW-Stout submitted all appropriate documentation to SEVP informing them of the operational change due to COVID-19.

10. UW-Stout's current plans for the fall 2020 term is to have a hybrid approach of course delivery comprised of hybrid, in-person, and remote learning. The start and end dates of our term remain unchanged; however, size limitations are being implemented for all in-person classes. Should the need arise to transition to alternative delivery methods akin to the spring 2020 term, the university shall act according to health department, state and federal guidance on best practices to ensure health and safety of the academic community.

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

Executed this 11th day of July, 2020.



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D. Scott Pierson  
Director, Office of International Education  
University of Wisconsin – Stout