

**EXH. 7**  
**DECL. OF CHERYL F. GREEN**  
**(GOVERNORS STATE 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 CHERYL F. GREEN, GOVERNORS STATE UNIVERSITY**

**DECLARATION OF CHERYL F. GREEN**  
**GOVERNORS STATE UNIVERSITY**

I, Cheryl F. Green, pursuant to 28 U.S.C. § 1746, hereby declare and affirm,

1. I am the President of Governors State University (the “University”) located in University Park, Illinois. My educational background includes a Ph.D. and master’s degree in Counseling Psychology from Southern Illinois University and a bachelor’s degree in psychology from Manchester College (now Manchester University). I have been employed as President since July 1, 2020.

2. I submit this declaration in support of the State of Illinois’ 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 (the “Rule”).

3. I have compiled the information set forth below through personal knowledge and Governors State University 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 Governors State University.

**Background on Governors State University and International Student Population**

4. Governors State University was founded in 1969, originally as an upper-division institution with a primary focus of serving community college graduates pursuing baccalaureate degrees. During the five intervening decades, Governors State University has grown to over 5,500 students pursuing degrees at the bachelors, masters, doctoral, and certificate levels to ensure students earn the qualifications needed to succeed in business, industry, healthcare, the arts and education. Consistent with its mission statement, Governors State University is

committed to offering an exceptional and accessible education that prepares students with the knowledge, skills, and confidence to succeed in a global society. The enrollment of students at Governors State University from outside the United States provides an accessible education to hundreds of students each year, many of whom remain in the United States after earning a degree, while improving the lives of domestic students by providing experiences and opportunities that help them see a world beyond the Chicagoland region.

5. Governors State University was created by an Act of the General Assembly of the State of Illinois (110 ILCS 670) and is governed by a Board of Trustees who have the authority to operate, manage, control, and maintain the university consistent with applicable law. As a state agency, the University is subject to annual appropriations to support the operations and maintenance of the University, subject to state mandates and orders. For Fiscal Year 2020 (which ran from July 1, 2019 to June 30, 2020), the University was appropriated \$23.1936 million dollars in operating appropriations in addition to state grants received by our students.

6. In Academic Year 2019-2020, Governors State University had 5,947 students who studied from among 85 different degree and certificate programs at the bachelors, post-baccalaureate, masters, post-masters, and doctoral levels in four academic colleges. These students were supported by over 1,000 faculty, staff, and temporary employees. In Fiscal Year 2016, Governors State University contributed an estimated \$247.7 million dollars to the State of Illinois, not including the economic impact of over 48,000 alumni, most of whom continue to reside in the region.

7. Governors State University currently has 124 enrolled students who have F-1 visas. These students come from 19 countries.

8. Governors State University has 352 newly admitted students for enrollment in fall 2020 who will require F-1 status. Of these students, it is believed that 11 are currently in the United States and 341 are currently living outside the United States and require a visa to enter the country for study. Of the 341 newly admitted students living outside the United States, 227 have completed the I-20 process required to receive a visa to enter the country for study. Through tuition alone, these new and continuing students are expected to contribute more than \$4.5 million dollars to Governors State University. That figure increases when considering revenue generated from fees, housing, and other revenues from those students.

9. The potential loss of the University's current and incoming international students would cause serious harm to the University's financial stability and the campus' character and culture. As previously noted, the University's international students on F-1 status enhance the campus culture and expand the experiences of "place-bound" domestic students while also providing financial resources in the form of tuition, mandatory fees, room, and board.

### **Economic Harm to Governors State University**

10. Due to the projected impact of the Rule, current and future students of Governors State University are at risk of losing their ability to obtain and maintain F-1 visas and may withdraw from course work temporarily or permanently, seeking enrollment opportunities outside our institution and potentially outside the United States. For University students who are currently in the United States, they may not be able to relocate safely to their home country to study remotely and face significant financial barriers to continuing enrollment, which may affect their ability to complete their degree program.

11. There are currently 476 enrolled and admitted students on F-1 status that may disenroll or not complete the enrollment process at Governors State University due to the Rule.

12. The estimated lost revenue from these students not enrolling is roughly \$4.5 million dollars in the form of lost tuition, mandatory fees, on-campus housing and meals. The Chicagoland region will also face potential negative impact from loss of the economic activity and cultural significance traditionally generated from international students who live off-campus in the surrounding communities.

13. University students on F-1 status generally pay a higher out-of-state tuition rate which provides additional resources for domestic student financial aid and campus offerings and programming. The reduction or elimination of F-1 status international students could have a significant impact on the enrollment and degree completion of domestic students served by Governors State University.

14. If Governors State University is forced to revise its planned schedule for fall 2020 to provide more in-person instruction settings to meet the requirements of the Rule, the University estimates additional costs of \$350,000 to \$500,000 to cover operational expenses such as additional personal protective equipment, cleaning supplies, etc. In addition, the University estimates that personnel costs will rise as a result of the necessity of additional temporary faculty, support staff and counselors on campus to provide the services required for safe and prudent in-person instruction during the COVID-19 pandemic.

#### **Administrative Burdens and Planning Disruptions**

15. Governors State University will always put the health and safety of its students, faculty, and staff first. To comply with the disaster proclamation and resulting direction issued in March 2020, by the Illinois Governor relating to the COVID-19 pandemic, the University delivered courses remotely and significantly reduced on-campus personnel to essential staff while maintaining a high quality educational experience for students and the full suite of services

for those students who remained in campus housing, needed access to campus computer networks, and other services. Additionally, there was an increase in reasonable and prudent expenditures in order to follow the guidance from the Federal Government and the Governor's Office.

16. The instructional plans for the coming semester are currently being finalized with a focus on the health and safety of students, faculty, and staff, and taking into account all accreditation requirements and program and course learning outcomes for students.

17. Complying with the Rule will require the University to verify registration of each international student in order to certify and reissue the I-20 by August 4, 2020. A concern for the University is that the University's Fall 2020 registration continues through the month of August, after the imposed August 4<sup>th</sup> date imposed by the Rule. Until the US Department of State resumes visa services, it is difficult to anticipate completing all necessary paperwork to enroll all eligible students and meet guidelines by the August 4<sup>th</sup> date set forth by the Rule.

18. Due to the Rule, Governors State University faces considerable uncertainty and may be forced to reevaluate housing contracts, part-time and permanent staff hiring and contracts, and revenue estimates that can impact financial aid and campus services and operations. The University also anticipates increased administrative burdens and costs if required to implement the Rule, as it will place considerable and unanticipated strain on Governors State University and its staff and finances at a critical time for the future of the institution and in the lives of its students.

### **Harmful Impact on Educational Mission**

19. For students who are denied visas, the educational impact on students due to the Rule varies by degree program, but it can include the inability to enroll and complete a program, delays in graduation, and delays in research projects.

20. Educational effects of the Rule, as a result of denied visas, include the loss of collaboration and interaction with faculty and fellow students, losses to domestic students who gain from the experience of learning alongside students from other countries, campus life that is diminished by the loss of these students, and educational experiences for students that take place outside the classroom, such as presentations, lectures, and on-campus employment.

### **Impact on Health of Students, University Community, and Public Health**

21. For students who are denied visas due to the Rule, the negative health effects can include difficulty leaving the United States due to restrictions in other countries and restrictions to travelers from the United States, the health impact of COVID-19 in their home country. Also possible are significant strains in mental health due to the uncertainty and immediate transitions and disruptions caused by the Rule and the timing of its implementation. The health and safety of those students is an immediate concern as well as their long-term mental health as they navigate the Rule and the COVID-19 pandemic in the United States and in their home country.

### **Economic Harm to Students and the States**

22. The economic impact for international F-1 status students can include disruptions in their academic plans, difficulty in obtaining future work visas, delayed graduation, unexpected funds to travel to their home country and find housing until a visa can be obtained, and costs if the student chooses to transfer to another institution. Additionally, placing their health at risk can have a catastrophic impact on their finances and future.



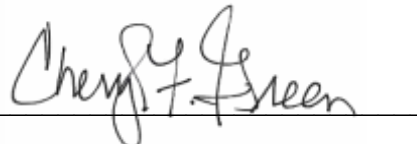
23. Local and regional businesses may lose future employees and the economic and intellectual impact that they bring as these students delay graduation, struggle to obtain work visas, or move to other regions in the United States or other countries to complete their degree. The loss of international F-1 status students due to the Rule could have lingering economic ramifications to our region and others, at a time when the long-term economic impacts of the COVID-19 pandemic are not yet known.

24. The loss of international F-1 status students will have serious financial impacts to Governors States University with estimated losses of \$4.5 million and that loss will also impact the region in the form of reduced university spending, reductions in staffing, and the loss of student spending and rental housing.

25. For the more than 400 admitted and continuing international F-1 status students, the adoption of the Rule will cause immediate and life-long disruption. For Governors State University's campus community, the campus becomes less vibrant and students lose valuable learning and collaborative opportunities. And economically, the loss of these students could have significant short-term and long-term impacts on the fiscal health of Governors State University and its ability to meet its mission and serve the State of Illinois.

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

Executed this 11th day of July, 2020

A handwritten signature in cursive script, reading "Cheryl F. Green", is written over a horizontal line.

Cheryl F. Green, Ph.D.  
President  
Governors State University