Dear OIRA,

[EnglishUSA](%3ehttp:/englishusa.org/%3c), the largest association of post-secondary intensive, pathway, and ESL support programs applauds the efforts being made by the Office of Information and Regulatory Affairs (OIRA) to broaden public engagement in the Federal regulatory processes and appreciates the opportunity provided by the current administration to submit feedback on the recommendations that have been released.

As a trade association, we are particularly interested in this recommendation: “***Proactively engage communities early and throughout the regulatory process to efficiently use government and community time and resources***.”  Given that EnglishUSA is the only professional trade association representing all types of programs and institutions throughout the U.S. that recruit and enroll international students for English language training, we believe that we can be helpful in serving as a liaison with government agencies earlier on in regulatory processes that directly impact our member programs and the international students they serve.

Our community is very proactive in engaging during comment periods on policy, but a proactive outreach from federal agencies to EnglishUSA and other associations to address and determine policy problems, needs, and possible alternatives would result in regulatory changes that address both federal and stakeholder concerns.

We have a specific example to share. On September 24, 2020 the Department of [Homeland Security](https://www.federalregister.gov/agencies/homeland-security-department) released a [Proposed Rule](https://www.federalregister.gov/documents/2020/09/25/2020-20845/establishing-a-fixed-time-period-of-admission-and-an-extension-of-stay-procedure-for-nonimmigrant) that, if enacted, would have made significant changes to international student study in the U.S., and in particular, changes that would have negatively altered English language study for international students. The proposed rule was a shock to the industry, and thankfully, it was withdrawn on July 6, 2021.  It was an example of agencies not engaging with key stakeholders to address perceived policy concerns and in the end, the proposal was an inefficient use of government and community time and resources.

To efficiently use government and community time and resources, we request that EnglishUSA leadership be asked to participate early in discussions with the Departments of State and Homeland Security regarding any proposed regulatory changes impacting international student enrollment in English language programs.  We have the capacity to reach over 1500 sector specific individuals and institutions who administer English language training programs in the U.S. and who can provide multiple and diverse case studies to help inform policy.

We applaud the OIRA’s efforts and recommendations to ensure success among all the necessary government agencies involved in the regulatory process and are confident that including EnglishUSA leadership in your dialogs would be of great benefit in creating policies that are effective and inclusive of constituents’ needs.

If you have any questions, please do not hesitate to ask.

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