

Roundtable on the Final Rule: Fixed Time Periods of Admission and Extensions of Stay

July 27, 2026
2:00 - 3:30

This session will not be recorded; slides will be shared on the EnglishUSA Engage Community

Share questions in chat and in the optional breakout rooms at the end of the session

Today's Goal: Clarity & Community

Some provisions
of the final rule
are clear.

Some provisions
require
interpretation.

EnglishUSA is
not providing
legal advice.



Let's share what we
know today about the
impact of the final rule
on English language
programs, identify
questions that need
further clarification
and hear how
EnglishUSA can
support you.

Format

- Introductions / Housekeeping
- EnglishUSA Resources/Outreach
- What Programs Should Anticipate
- Member Survey Summary
- Final Rule: Questions & Considerations
- Future Roundtable Sessions
- Optional Breakout Rooms

Association Committees

Representing the diversity of our industry

Advocacy & External Relations Committee

- Wendy Henderson, Kaplan
- Annie Gill-Bloyer,
Northeastern Illinois University
- Aga Paul, USC
- Caroline Gear, ILI of
Massachusetts

Advocacy Response & Advisory Committee

- Daryl Bish, University of Florida
- Mathelda Molina, ELS
- Jeff Hutcheson, TESOL
- Travis Harman, Drexel
University
- Wendy Henderson, Kaplan
- Tim Knoespel, WESLI

*Ad hoc committee implemented in
July 2026*

Resources/Outreach

- Today's slides will be shared on the Engage Community
- EnglishUSA "Explainer" coming soon (bookmark "Advocacy Resources" under Resources/EnglishUSA website)
- Communication with NAFSA, US for Success Coalition, Presidents' Alliance, and the Alliance
- ELPAC (English Language Program Advisory Council) convened by EnglishUSA with meeting in August

Programs/Institutions Can Anticipate:

- Increased (prospective) student confusion
- Increased workload for DSO/advisers
- Training costs for (P)DSOs
- Increased costs & delays for students (fees, biometrics, interviews)
- Negative impacts on program enrollments
- Authority shifted to DHS/USCIS, but accountability remains with the programs



Adapted from NAFSA resources

Members' Top Concerns

Ranked from areas of final rule

1. Extension of Stay (EOS) applications and timing
2. Progression from English language or pathway programs to degree programs
3. Defining when an English language program has been 'completed'
4. Pathway and conditional admission students
5. Transfers between English language programs
6. Institutional policy and procedural changes
7. Changes in educational objectives
8. Students needing more than 24 months of English language training



Survey

Approximately 40% of responding programs have already encountered student situations requiring guidance under the new rule.

Top Questions Raised by Members

Fixed Periods of Admission and the Admit Until Date (AUD)

What happens to students in the U.S. with Duration of Status (D/S) after September 15? Should I extend the I-20 program end date for active and initial students before September 15?

Extension of Stay (EOS)

How should programs advise students who need an Extension of Stay, and what can students do while an EOS application is pending?

Student Progression & Educational Objectives

Can students begin degree study when they are academically ready, or must they wait for immigration requirements to be satisfied?

Pathway Programs & Conditional Admission

How does the final rule affect integrated pathways, conditional admission, and transitions to degree programs?

Transfers & Student Mobility

How do the new transfer restrictions affect English language students moving between programs or institutions?

24-Month English Language Training Limit

How will the lifetime limit be calculated, tracked, and communicated to students?

Recruitment, Advising & Student Communication

How should programs advise prospective and current students amid increased uncertainty?

Program Operations & Institutional Planning

What operational, policy, and procedural changes should English language programs begin planning for now?



Survey

Concerns Behind the Questions

What's Keeping Us Up at Night?

- Students are ready for degree study—but immigration timelines aren't.
- Pathway and conditional admission programs lose their competitive advantage.
- Recruitment becomes harder because academic progression is less predictable.
- Students choose another country—or skip the U.S. IEP altogether.
- Transfer pipelines shrink, affecting enrollment and revenue.
- Students needing more than two years of English study run out of options.
- EOS processing delays interrupt academic timelines.
- Advising shifts from educational planning to immigration navigation.



Survey

Next Up: Questions & Considerations for ELPs and ELT

Review of Final Rule

FOLLOWED BY

Breakout Rooms

Post: Review of Final Rule

**Room 1 – Student Progression &
Academic Mobility**

**Room 2 – Extension of Stay (EOS) &
Student Advising**

**Room 3 – Pathway Programs &
Conditional Admission**

**Room 4 – Transfers, Educational
Objectives & Student Mobility**

**Room 5 – 24-Month ELT Limit &
Program Planning**

**Room 6 – Institutional Planning &
Emerging Questions**

Discussion Guide



**Google Doc for
Notes**



The Final Rule:

Questions and Considerations for ELPs and ELT

- Place questions in the chat. Ask them during the breakout room discussion. Use the EnglishUSA Engage Forum.
- Share program-specific and institution type-specific issues:
 - EnglishUSA survey (QR code) - EnglishUSA is compiling questions and issues and passing them on the NAFSA, U.S. for Success Coalition, etc.)
 - NAFSA IssueNet - 'Report an ISS Issue'
<https://www.nafsa.org/professional-resources/nafsa-issuenet>
 - Contact your SEVP Rep or SEVP directly



Survey

Fixed Periods of Admission and the Admit Until Date (AUD)

Entry on or after September 15, 2026

- AUD: a specific date indicating how long they are authorized to remain in the United States.
- AUD = I-20 program dates + (new) 30 day grace period, [per the rule](#)
 - 24-month maximum admission period for ELT + 30 days, also [per the rule](#).
- Extension of Stay (EOS) application with USCIS to stay beyond the AUD

Students in the U.S. under Duration of Status (D/S) starting September 15

- Retain D/S status and the 60-day program completion grace period.
- EOS (aka, I-539) application with USCIS to extend beyond the I-20 program end date.
- Will get an AUD with the 30-day grace period if they exit and reenter after September 15.

Fixed Periods of Admission and the Admit Until Date (AUD)

Considerations for ELPs

- Review program policies on extending a registered student's program of study. How long can you extend for? Do you need to see new financial docs?
- Review policies on program length and how initial I-20 or DS-2019 program dates are established.
 - How much funding do you need to see to issue a 2-year or more I-20?
 - Academic year for a clock hour program = 26 weeks
- What is your plan for informing prospective, admitted, and current students about any changes in program policy?
- How will you inform internal and external stakeholders?
- How will CBP handle the 24-month ESL limit and the AUD?
 - What's the AUD for F-1 students on break, vacation, or leave of absence returning to the US after September 15?
 - After September 15, how will CBP determine the AUD for a initial F-1 student who previously studied ELT for over one year in 2024 and 2025?

Extension of Stay (EOS) Process

After September 15, 2026, students who require additional time beyond their Authorized Admission Period generally must submit Form I-539 to USCIS.

- Timely file **before** the program end date on their I-20 or DS-2019.
- \$420 application fee to file the online I-539 application
 - biometric scanning /maybe an interview
- Maintain status while the application is being adjudicated.

Considerations for ELPs

- Anticipated long USCIS processing times - 8 month processing time currently
- How will the 24-month limit factor in to an EOS?
 - Automatic denial if the period of study is over the 24-limit?
- Can a student enroll while the EOS is pending?
 - Yes, per <https://www.federalregister.gov/d/2026-14439/p-754>, but....
- Can a student exit and reenter the U.S. to circumvent the EOS?

24-Month English Language Training Limit

The rule caps English language training students at a 24-month aggregate lifetime limit.

- Time completed before September 15 does not count toward the limit.
- Includes vacations, breaks, and leaves of absence (including medical)
- No extensions of stay for ELT beyond the 24-month maximum
- 24-limited is “calculated as an aggregate of 24 months from the student's program start date (plus a 30-day period for departure).” - from the final rule **preamble**:

<https://www.federalregister.gov/d/2026-14439/p-807>

Considerations and Questions for ELPs

- After 9/15, how will the lifetime, aggregate, 24-month limit be monitored and tracked by CBP, USCIS, and SEVP?
- How will it impact student transfers to another ELP or transfers/pathways to a degree program?
- How will ELPs be aware of a student’s prior English language training?
- What are impacts on your program’s curriculum, the length and structure of your program, and progression policies?

Limits on F-1 transfers and changes of educational objectives in the first academic year

- New regulatory concept of “educational objectives,” which the rule generally defines as “majors or educational levels.”
- “An F-1 student at any level below the graduate degree level may not transfer or change educational objectives, i.e., majors or educational levels, within the first academic year of a program of study, **unless an exception is authorized by SEVP for extenuating circumstances.**” (Revised [8 CFR 214.2\(f\)\(5\)\(ii\)\(A\)](#))

What this means for ELPs and students

- EOS is required for approval of transfers or changes in education level within the first academic year (26-weeks for clock hour programs) for students who have **NOT COMPLETED** their program of study.
- SEVP must approve exceptions for extenuating circumstances...“or other cause.”
- Can a student exit and re-enter the U.S. to circumvent transfer limits within the first academic year?

F-1 transfers following the completion of a course of study

An F-1 student who ***completes a program of study*** after September 15, 2026 and wishes to begin a subsequent program would be limited to subsequent programs at a higher educational level. ([8 CFR 214.2\(f\)\(v\)\(ii\)\(C\)](#)) & [8 CFR 214.2\(f\)\(v\)\(ii\)\(B\)](#))

- [Link to NAFSA's Analysis](#)

What this means for ELPs and students

- Transfer to a degree program is not limited to the academic year requirement *because of I-20 program completion*.
 - This question was added to SEVIS for transfers and completions:
 - “Did the student, or will the student receive a degree, diploma, certificate, transcript or other similar document indicating completion of all curricular requirements for the program of study at your institution?”
- No reverse matriculation
- How does I-20 program completion impact lateral transfers to another ELP?
- How will SEVP and USCIS define completion of ELT?
- Can a student exit and re-enter the U.S. to circumvent the EOS?

Movement between campuses under the same Form I-17

[From the preamble](#), “DHS does not consider movements between campuses, that is, between instructional sites listed under a singular Form I-17 petition, to constitute a transfer or change in educational objective for the purposes of this rule. Transfers between campuses on the same Form I-17 will be reclassified as campus reassignments.”

“DHS plans to introduce functionality that will allow students to be reassigned from one campus to another within a certified Form I-17”

- [Link to NAFSA’s Analysis](#)

What this means for ELPs, conditional admission, pathway programs

- No EOS for “movement” or change in educational level under the same I-17
- Yes, EOS to extend beyond the student’s AUD or ELT I-20 program end date
- Yes, EOS to transfer to a new school (different I-17)

Future ZoomArounds & Other Resources

EnglishUSA plans to offer additional informal discussions & strategy meet-ups in August for members to share their ideas & resources with each other. Suggested topics for sessions:

- Advising Students
- Pathway Program Restructuring
- 24-Month Limit
- Transfers



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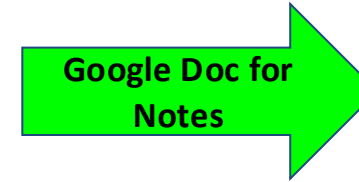


Go to EnglishUSA
website and click on
“Events” and
“Events Calendar” to
register

Breakout Rooms

Your choice!

Feel free to change rooms!



Room 1 – Student Progression & Academic Mobility

Discussion Focus

- Progression from ELPs to degree programs
- Educational objectives
- Early completion of English proficiency
- Academic readiness vs. immigration

Room 2 – Extension of Stay (EOS) & Student Advising

Discussion Focus

- EOS timelines
- Pending applications
- Student advising/communication
- Travel vs. EOS

Room 3 – Pathway Programs & Conditional Admission

Discussion Focus

- Integrated pathways
- Conditional admission
- I-17 structures
- University partnerships
- Academic transitions

Room 4 – Transfers, Educational Objectives & Student Mobility

Discussion Focus

- Transfer restrictions
- Educational objectives
- Multiple campuses
- Campus reassignment
- Reverse matriculation

Room 5 – 24-Month ELT Limit & Program Planning

Discussion Focus

- Long-term students
- Tracking ELT
- Returning students
- Curriculum implications
- Program length

Room 6 – Institutional Planning & Emerging Questions

Discussion Focus

- Internal policies
- Recruitment
- Staffing
- Communications