



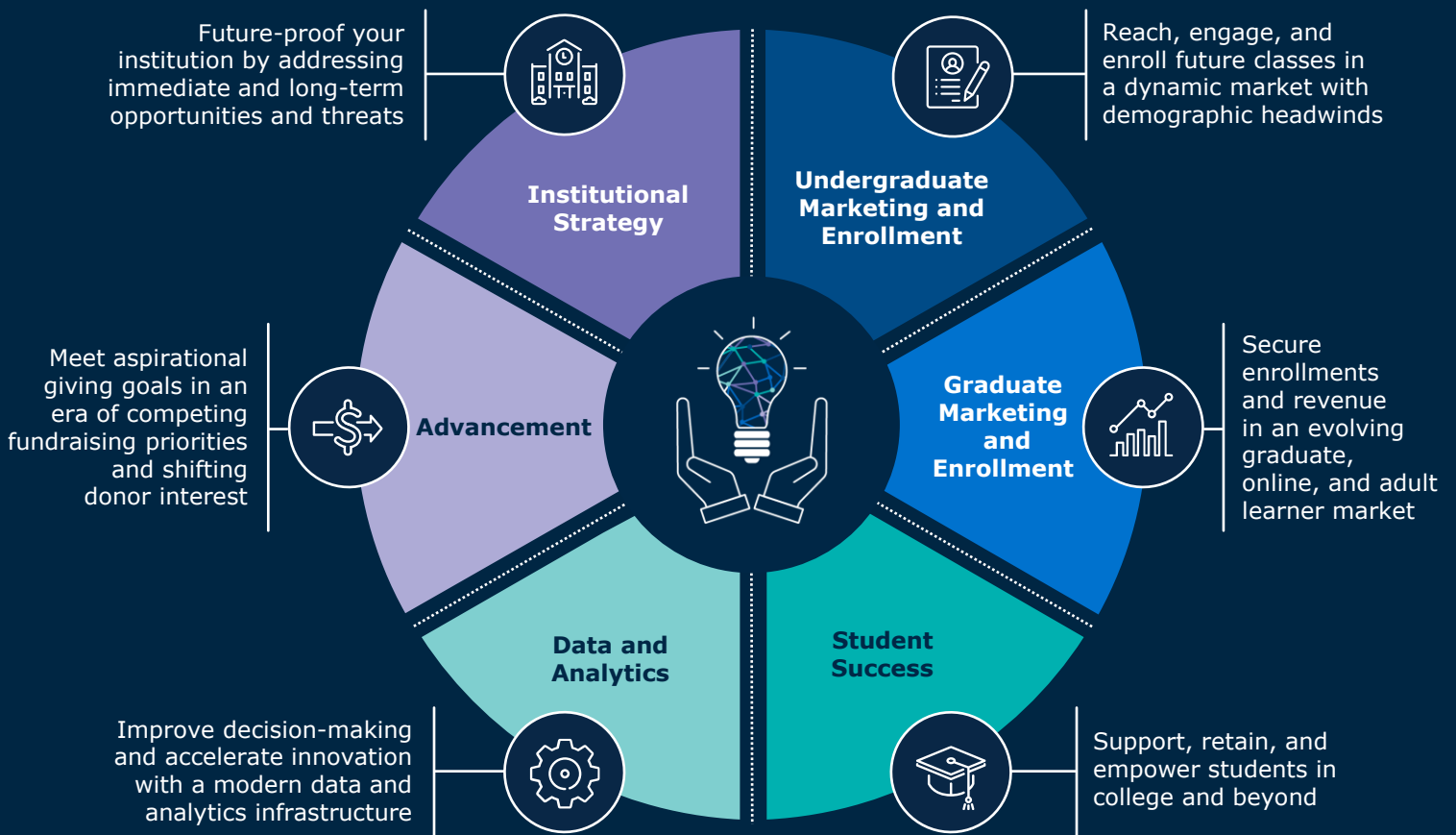
STRATEGIC ADVISORY SERVICES

# **Federal Policy Primer and Discussion Guide: Immigration and International Enrollment**

A Guide to Help Education Leaders Navigate the 2025  
Presidential Transition and Related Federal Changes

*Date of Publication: February 14<sup>th</sup>, 2025*

**Insight-Powered Solutions for Your Top  
Priorities and Toughest Challenges**



We partner with **2,800+** institutions to accelerate progress, deliver results, and enable lasting change.

**95%+** of our partners return to us year after year because of results we achieve, together.

# Navigating a New Immigration Landscape

## Key Considerations For Leaders in Higher Education

**The Trump administration's second term has ushered in significant changes to federal immigration policy, intensifying its hardline approach.** Key measures include stricter vetting processes for visa applicants, expanding interior immigration enforcement, and the revival of controversial enforcement mechanisms such as mass deportations and the “remain in Mexico” policy. The administration has also moved to limit legal immigration pathways and increase interior enforcement. These policy shifts, implemented through a series of executive orders and agency directives, represent a comprehensive effort to reshape the U.S. immigration system.

**For colleges and universities, these policy changes present substantial challenges.** Stricter visa regulations and enhanced vetting processes may lead to decreased international student enrollment and create complications for F-1 and J-1 visa program management. The potential removal of protections for sensitive locations such as college campuses could expose undocumented students to increased enforcement risks. Universities may face new compliance burdens and potential conflicts between federal mandates and institutional priorities. As a result, college and university leaders must navigate a complex landscape, balancing legal obligations with their commitment to fostering strong academic communities.

### This Primer Aims to Help Leaders in Higher Education Unpack the Following Topics:



#### What’s Changed for Undocumented Students

How recent orders and legislation will change their experience on campus



#### What’s Changed for International Students and Staff

How changes in procedure and policy may limit their access to U.S. education



#### What’s Changed for Institutions and Compliance

How the administration is attempting to ensure alignment with federal priorities



#### What Hasn’t Changed, Yet

Where policies associated with the Trump campaign stand today



*NOTE: this document is not to be construed as legal advice. The implications mentioned may vary between states and institutions. Information and analysis in this document is current as of the date of publication and is subject to change. Consult with legal counsel before taking responsive action.*

# What's Changed for Undocumented Students?

## Summary of Policy Changes

### Immigration Enforcement Officials May Conduct Operations in Schools

On January 21, 2025, the Department of Homeland Security issued a directive rescinding the Obama-era “protected areas” policy,<sup>1</sup> which prevented immigration officials from conducting operations in areas such as hospitals, churches, and schools. Officials still need a judicial warrant to enter non-public areas.<sup>2</sup>

### Campus Police May Conduct Immigration Operations

In *Protecting the American People Against Invasion*,<sup>3</sup> President Trump directed the Department of Homeland Security to establish 287(g) agreements with state and local law enforcement agencies, allowing local officers to perform the duties of immigration agents.

### Deportation Without a Hearing is Now Possible Anywhere in the U.S.

The administration broadened the application of expedited removal, allowing DHS to deport individuals without a hearing before an immigration judge if they cannot prove continuous U.S. presence for at least two years.<sup>5</sup>

### If Accused of Crimes, Undocumented Students Can Be Placed in Federal Detention

The Laken Riley Act, signed into law by President Trump in January 2025, mandates the detention of undocumented immigrants accused of theft, assault of an officer, or other violent offenses without a conviction.

## Recommendations for Institutions

*Establish proactive protocols for managing an immigration enforcement event*

While the likelihood of such events occurring on campuses is low, the risk for disruption and flashpoints is high. Being prepared will build confidence and reduce anxiety.

*Discuss ways to sustain and strengthen trust in campus/local police*

Some campus departments have pledged not to sign these agreements.<sup>4</sup> Whether or not this is true for your institution, opening a dialogue about ways to sustain trust will be important.

*Watch for changes in attendance and community engagement among undocumented students*

K-12 school districts are already seeing an increase in absenteeism among undocumented students,<sup>1</sup> so many are communicating that school campuses are still the safest place to be.

*Ensure that students are aware of changes in the law*

While discussing these topics may cause anxiety, keeping students informed of changes in the law equips individuals to make informed choices and can help to keep all parties safe.

## Strategic Question

What policies, guidelines, and values will we adhere to when navigating issues related to undocumented students and workers throughout the Trump administration?

# What's Changed for International Students and Staff?

## Summary of Policy Changes

### Enhanced Screening and Vetting Will Apply to All Visa Applicants

President Trump's early executive orders included a directive to restore the screening and vetting practices that were in place on January 19, 2021.<sup>6</sup> Enhanced screening practices will likely involve social media screening and an increase in requests for evidence. This applies to all visa programs and can be implemented immediately.

### Likelihood of Travel Bans for Individuals from Countries Deemed to be "High Risk"

Many expected to see the reintroduction of travel bans on Trump's first day in office. That did not occur. Instead, cabinet members have been given 60 days to compile a list of countries with "deficient" screening, vetting, and information-sharing practices.<sup>6</sup> This directive sets up the conditions for future travel bans that will likely be upheld in court. Some have raised concerns that future bans may include certain groups from China and India,<sup>7</sup> but those fears are currently no more than speculation.

### Potential Risk of Deportation for Political Speech

President Trump signed an executive order<sup>8</sup> threatening deportation of those involved in anti-Israel protests on college campuses. An accompanying Fact Sheet published by the White House indicated that the action would apply to "all" student visa holders who engaged in "pro-Jihadist" protests, ensuring that the order would be widely seen and discussed. While the government does have the power to revoke student visas, implementation of this policy is likely to be met with strong resistance in the courts. Many experts question whether it violates free speech protections.

## Recommendations for Institutions

*Proactively prepare applicants for new processes and timelines*

Students must be admitted to a program before applying for a visa, creating an enrollment risk for schools. Ensuring that students (and international faculty) are equipped to navigate the process will minimize the risk of unnecessary visa denials.

*Anticipate the impact of future travel bans through tabletop scenario planning*

Institutions with a significant number of students and faculty from countries affected by previous travel bans and those likely to be deemed "high risk" should consider modeling the effect of future bans on enrollment, staffing, research, and collaborative programs.

*Take steps to build and maintain trust with student activists*

By shifting the institution's approach to activism from crisis management to proactive engagement, student affairs leaders can help students drive change while minimizing the risk of undesired consequences and disruption.

#### **EAB Resource:**

[\*Build and Maintain Trust With Student Activists\*](#)

## Strategic Question

How can we sustain a compelling and differentiated value proposition for international students and faculty who may be deterred by a less welcoming national climate?

# What's Changed for Institutions and Compliance?

## Summary of Policy Changes

### Threats to Remove Funding From Sanctuary Jurisdictions

The executive order *Protecting the American People Against Invasion*<sup>3</sup> directs the Attorney General and Secretary of Homeland Security to undertake any lawful actions that would prevent "sanctuary" jurisdictions from receiving access to federal funds. While the Supreme Court did not vote<sup>9</sup> on any of the three cases brought on this issue during Trump's first term, lower courts have repeatedly ruled against<sup>10</sup> the administration's attempts to restrict funding, citing Tenth Amendment protections.<sup>11</sup>

### Directives to Audit Contracts and Grants With NGOs Assisting Illegal and Removable Aliens

The same executive order cited above<sup>3</sup> also directs cabinet officials to withhold federal funds from organizations providing assistance to illegal and removable aliens. While higher education institutions are not typically classified as non-governmental organizations, attempts via recent executive orders<sup>12</sup> to classify institutions receiving Title IV funds as federal subcontractors has led some to question whether this policy would apply to those providing in-state tuition to undocumented students.<sup>13</sup> For the same reasons cited above, any efforts to withhold funds will likely face significant legal challenges in the courts.

### Pressure to Report "Illegal" Behavior Among International Students

The executive order *Additional Measures to Combat Antisemitism* encourages institutions to monitor and report "alien students and staff" engaged in behaviors that meet the "grounds for inadmissibility under 8 U.S.C. 1182(a)(3)." There is currently no language indicating that the federal government could enforce that recommendation.

## Recommendations for Institutions

### *Monitor, but no immediate action needed*

The likelihood of this directive affecting colleges and universities is low. However, because there is no legal definition of "sanctuary jurisdictions," the directive largely indicates an intent to place financial pressure on cities and institutions that resist federal immigration enforcement efforts. This makes the overall issue worth monitoring for leadership teams and boards.

### *Evaluate financial exposure based on discretionary contracts and grants*

Whether or not this directive applies to colleges and universities is currently unclear. However, it does signal an intent to place financial pressure on institutions to support federal immigration policies. Because discretionary contracts and grants are likely more vulnerable to non-renewal, those providing any support to undocumented immigrants should be aware of the financial risk.

### *Clarify institutional policies and practices with student unions and groups*

The most immediate consequence of this directive is likely to be erosion of trust. If students think they are being monitored, campus life will feel less welcoming, which could potentially have a negative effect on campus climate and international student enrollment.

## Strategic Question

With so much uncertainty around what the administration will or won't do to restrict funds, what level of financial risk are we willing to tolerate when weighing differences between federal priorities and institutional values?

# What Hasn't Changed, Yet

## Summary of Proposed Policy Changes

### Protections for DACA Recipients

With more than 400,000 “dreamers” enrolled in US colleges and universities,<sup>14</sup> the fate of the Deferred Action for Childhood Arrivals program will be closely watched by institutional leaders nationwide. Because the Supreme Court dismissed the Trump administration’s previous attempt to end DACA protections on procedural grounds,<sup>15</sup> many expect President Trump to resume efforts to end DACA protections during his second term.

### Changes to Student Visa Programs

The first Trump administration introduced a number of proposed changes to student visa programs, including transitioning from “duration of status” to fixed 2-or-4-year terms and reducing the grace period for participating students from 60 to 30 days.<sup>16</sup> These changes would introduce significant uncertainty for international students about their ability to complete longer programs of study and could deter many prospective students from choosing to study in the U.S. These proposals have not yet been introduced during Trump’s second term but could be implemented without congressional approval.

### Changes to H1-B Visas and “OPT”

There has been much recent debate over the future of the H1-B program.<sup>17</sup> Some members of the administration want to end the program entirely in favor of protecting jobs for Americans. Others are in favor of the program and see it as vital for securing top talent in high-demand fields. The first administration attempted to dramatically raise wage requirements for the program, but that effort was struck down by the courts. While next steps are unclear, this issue is likely to resurface over the coming months, and changes could have huge implications to higher education enrollment, research programs, and staffing.

## Recommendations for Institutions

### *If appropriate, advocate for solutions*

President Trump has indicated that he wants to find a long-term solution for “dreamers.” Leaders in higher education are in a unique position to be able to communicate the value of DACA recipients to our institutions and communities and have the ability to influence the thinking of state and national legislators.

### *Consider contingency planning*

Because these changes could happen moderately quickly and could have a sizeable impact on international enrollment, institutions should proactively consider how they might change programs and processes to alleviate anxiety if student visas are transitioned to fixed terms.

### *Discuss best-fit solutions*

The H1-B visa program is a high-stakes issue for higher education. With so many competing ideas on the table, there is still room for influential voices to provide common-sense solutions. A “wait and see” approach will place institutions on the back foot, and so leaders should engage in proactive conversation about a model that could serve all invested parties.

## Strategic Question: How Can We Affect Productive Change Through Uncertainty?

All three of these issues have fates that are uncertain, and there is considerable room for good ideas to prevail. Which issues matter most to our institution, and which solutions would we advocate for in each case?

## Discussion Questions and EAB Resources

---

As you review this policy primer and consider the implications of recent immigration and international enrollment changes, use the following discussion questions to inform your institution's next steps. We suggest engaging your cabinet, along with key stakeholders such as the Vice President for Student Affairs, Legal Counsel, and Chief Advancement Officer.

### **4 Strategic Questions Every Team Should Be Discussing Right Now**

- What policies, guidelines, and values will we adhere to when navigating issues related to undocumented students and workers throughout the Trump administration?
- How can we sustain a compelling and differentiated value proposition for international students and faculty who may be deterred by a less welcoming national climate?
- With so much uncertainty around what the administration will or won't do to restrict funds, what level of financial risk are we willing to tolerate when weighing differences between federal priorities and institutional values?
- All three of the issues mentioned on the 'What Hasn't Changed, Yet' page (protections for DACA recipients, changes to student visa programs, changes to H1-B visas and 'OPT') have fates that are uncertain, and there is considerable room for good ideas to prevail. Which issues matter most to our institution, and which solutions would we advocate for in each case?

### **EAB Resources to Support Next Steps**

- **Schedule an EAB-facilitated Scenario Planning Workshop:** To learn more about EAB's scenario planning workshop, contact your strategic leader or email [policy@hello.eab.com](mailto:policy@hello.eab.com)
- **Build And Maintain Trust With Student Activists:** Use EAB's [resource center](#) to shift from a reactive to proactive approach when working with student activists on campus

## **EAB's Federal Policy Navigation Services**

To help education leaders make informed strategic decisions amid a rapidly shifting policy landscape, EAB's Federal Policy Navigation Services offers a unique suite of resources and support. This includes **policy primers, an implementation probability index, scenario planning exercises, workshops, and peer position pulse checks.**

To **learn more** about EAB's Federal Policy Navigation Services please contact your EAB Strategic Leader, Account Manager, or email [policy@hello.eab.com](mailto:policy@hello.eab.com)



## Endnotes

---

### *What's Changed for Undocumented Students?*

1. [https://www.nafsa.org/sites/default/files/media/document/BenjaminHuffmanProtectedAreasMemo\\_20250120.pdf](https://www.nafsa.org/sites/default/files/media/document/BenjaminHuffmanProtectedAreasMemo_20250120.pdf)
2. <https://www.fisherphillips.com/en/news-insights/immigration-enforcement-faqs-for-k-12-schools-in-new-trump-era.html>
3. <https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-american-people-against-invasion/>
4. <https://www.acenet.edu/Documents/Issue-Brief-Immigration-Related-Campus-Concerns-2025.pdf>
5. [https://www.dhs.gov/sites/default/files/2025-01/25\\_0123\\_er-and-parole-guidance.pdf](https://www.dhs.gov/sites/default/files/2025-01/25_0123_er-and-parole-guidance.pdf)

### *What's Changed for International Students and Staff?*

6. <https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-united-states-from-foreign-terrorists-and-others-national-security-and-public-safety-threats/>
7. <https://www.newsweek.com/trump-travel-ban-fears-international-students-return-home-early-2004064>
8. <https://www.whitehouse.gov/presidential-actions/2025/01/additional-measures-to-combat-anti-semitism/>

### *What's Changed for Institutions and Compliance?*

9. <https://www.scotusblog.com/2021/03/court-dismisses-sanctuary-cities-petitions/>
10. <https://constitutioncenter.org/blog/judge-blocks-cutoff-of-federal-funds-to-sanctuary-cities>
11. <https://www.jurist.org/news/2017/11/federal-judge-strikes-down-executive-order-to-withhold-funding-from-sanctuary-cities/>
12. <https://www.nacweb.org/public-policy-and-legal/legislation-and-regulations/latest-federal-update, https://www.whitehouse.gov/presidential-actions/2025/01/ending-illegal-discrimination-and-restoring-merit-based-opportunity/, https://publicaffairs.vpcomm.umich.edu/key-issues/updates-related-to-federal-orders-memos-and-agency-guidance/#:~:text=The%20order%20attempts%20to%20classify,Students%20for%20Fair%20Admissions%20vs.>
13. <https://www.acenet.edu/Pages/dotedu/126-New-Orders-New-Challenges.aspx>

### *What Hasn't Changed Yet*

14. <https://www.presidentsalliance.org/breakdown-of-dreamer-with-and-without-daca/#:~:text=Dreamers%20with%20and%20without%20DACA,graduate%20from%20high%20school%20annually.>
15. <https://www.nilc.org/articles/supreme-court-overturns-trump-administrations-termination-of-daca/>
16. <https://www.acenet.edu/News-Room/Pages/Trump-Administration-Seeks-to-Restrict-Student-Visas-to-a-Strict-Two-or-Four-Year-Timeframe.aspx>
17. <https://www.nytimes.com/2025/01/24/business/h1b-visa-immigration.html>



Washington DC | Richmond | Birmingham | Minneapolis

202-747-1000 | [eab.com](https://eab.com)

 [@eab](https://twitter.com/eab)  [@eab\\_](https://www.linkedin.com/company/eab_)  [@WeAreEAB](https://www.facebook.com/WeAreEAB)  [@eab.life](https://www.instagram.com/eab.life)

## ABOUT EAB

At EAB, our mission is to make education smarter and our communities stronger. We work with thousands of institutions to drive transformative change through data-driven insights and best-in-class capabilities. From kindergarten to college to career, EAB partners with leaders and practitioners to accelerate progress and drive results across five major areas: enrollment, student success, institutional strategy, data analytics, and diversity, equity, and inclusion (DEI). We work with each partner differently, tailoring our portfolio of research, technology, and marketing and enrollment solutions to meet the unique needs of every leadership team, as well as the students and employees they serve. Learn more at [eab.com](https://eab.com).