I strongly oppose docket ICEB–2018–0003–0001, as it seeks to simplify and automate the I–983 filing process for the OPT program. Currently, there is no shortage of qualified U.S. citizen STEM graduates facing difficulties securing employment. Lowering barriers in the OPT program during a recessionary period only serves to incentivize an increased number of international students competing for a limited number of American jobs.

Furthermore, many institutions have increasingly operated as "degree mills," producing credentials of questionable value. Simplifying OPT processes risks encouraging further enrollment of international students into these lower–quality programs, rather than genuinely attracting the most talented individuals. Policies should prioritize the employment prospects and economic well–being of U.S. citizens, particularly during times of economic uncertainty.

Currently, the I–983 forms are generally auto–approved with minimal scrutiny, and further automation would lead to even less enforcement. The I–983 process itself is flawed, as it often involves employers simply fabricating progress reports on behalf of the international students, who then easily obtain school approvals without meaningful review. Practically no significant resources are invested in verifying the authenticity of this paperwork. The most effective solution to reduce paperwork and administrative burden would be to eliminate the OPT program entirely.