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Comment:

Dear Assistant Secretary Risch,

The American Institute for Medical and Biological Engineering (AIMBE) writes to express our concerns regarding proposed regulations of immigrant and nonimmigrant visa applications, with our nation's dominance in science, technology, and engineering at stake.

U.S. innovation greatly depends on international collaboration. International scientists have made valuable contributions to the U.S. research enterprise and our nation has benefited from attracting the best and brightest international scholars. Simply put: Global health problems require global participation.

As such, 30 percent of U.S. graduate students are from abroad and 40 percent of Ph.D. candidates are foreign born. Since 2000, 39 percent of Nobel Prize winners from the United States have been American citizens not born on our shores. It is these examples of the infusion of foreign talent that has enabled our country to be a place where the brightest minds flock to solve society's most pressing challenges.

Global academic and scientific exchange is now constant and necessary, fueling the innovations essential to strengthening our nation's economy and improving the lives of U.S. citizens. Policy changes made today will affect our nation's competitiveness for years to come and should be carefully considered. Requiring every immigrant and nonimmigrant applicant to provide up to five years of social media accounts, telephone numbers, and email addresses, along with travel history, is likely to stifle the flow of future international travel to the United States.

The proposed screening requirements will have a negative impact on higher education and scientific collaborations. According to the Association of International Educators, the more than one million international students attending U.S. colleges and universities during the 2016-2017 academic year supported 450,000 U.S. jobs and contributed nearly \$37 billion to the U.S. economy. Moreover, for every 10 percent increase in international graduate students, U.S. patent applications increase by 4.5 percent. International undergraduate and graduate students and scholars contribute to the intellectual richness of our universities and serve as goodwill ambassadors in their home countries when they return. They also help U.S. students prepare for future careers and better understand our global neighbors.

The potential loss of these students and scholars is not an idle concern. In January, the Council on Graduate Schools reported a decline in first-time international graduate student enrollment in the United States for fall 2017, the first such decline in a decade. In FY 2017, DOS issued 16 percent fewer F-1 international student visas and 9 percent fewer B-1/B-2 visitor visas. By adopting burdensome visa application requirements absent a clear, evidence-based rationale, the United States risks sending existing and potential partners and students elsewhere, thereby enriching those countries with their intellectual and economic contributions, resulting in a double loss for the U.S.

Scientific exchanges, whether through long-or short-term visits or at professional society meetings, are vitally important to the United States. Many project collaboration meetings take place at conferences held in the United States, and not having the top international talent in attendance would be a significant problem. Scientists must periodically meet in-person, and if bureaucratic hurdles for entry into the United States are too high, they will hold their meetings elsewhere, hurting U.S. economic, technological, and scientific competitiveness. For example, the United States lost a bid to host the 2023 General Assembly of the International Union of Crystallography in San Diego, California, and delegates specifically cited visa policy concerns as an influencing factor in their decision. Moreover, many U.S. professional societies have significant numbers of international members, and it is important for those individuals to be able to attend the U.S. societies' meetings. The attendance of international scientists at U.S. meetings and conferences is important in terms of the intellectual content contributed, the number of collaborations with U.S. counterparts that are created or sustained, and the benefits accrued to the United States economy.

We are very concerned that if the additional requirements are implemented, international undergraduate and graduate students, scholars, and scientific collaborators may be further discouraged from coming to the United States, hampering the most outstanding science, engineering, and technology sectors in the world (within our borders).

We urge the Department of State to reconsider this expansion until further consideration is given to these concerns. Thank you for your consideration.

Sincerely,

Milan Yager
AIMBE Executive Director

Christine Schmidt, Ph.D.
President