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October 26, 2020

Submitted electronically via www.regulations.gov

The Honorable Chad Wolf
Acting Secretary of Homeland Security
Washington, DC 20528

RE: ICEB-2019-0006, Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media

Dear Acting Secretary Wolf:

The Conference of Boston Teaching Hospitals, on behalf of our 12 member hospitals, appreciates the opportunity to provide comments on the recent Department of Homeland Security (DHS) proposal to change its admission period regulations for F, J, and I visa holders. We are deeply concerned about the potential harmful impact this proposal could have for these visa holders, especially for J-1 physician trainees and research scholars. We strongly encourage you to exclude J-1 visas from this proposed policy.

The proposal would alter the Department's longstanding "duration of status" policy, which currently allows nonimmigrant visa holders to remain in the country for the duration of their relevant program, to instead assign a specific end date. Such a change has the potential to cause significant disruptions to patient care and medical research, which are critical to our ongoing efforts to fight the COVID-19 pandemic.

Under the proposed rule, relevant visa holders would be required to apply annually for an extension. Based on current U.S. Citizenship and Immigration Services processing times, many could be left unable to remain in or return to the United States to continue their training or research. It is reasonable to expect that requiring annual applications for extensions would only serve to increase average processing times, causing significant logistical challenges for ensuring trainees, researchers, and other visa holders can continue their important work without disruption.

We believe this proposed change is unnecessary, as it would not provide better information about an already carefully monitored group of nonimmigrant visa holders. As you know, all F, J, and M visa holders are currently tracked in the Student and Exchange Visitor Information System. This system includes program participation and authorized periods of stay, making it clear at all times when a visa holder's program participation or period of stay ends. On top of that, J-1 physicians are required to apply annually through the Educational Commission for Foreign Medical Graduates to renew their sponsorship.



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Boston's academic medical centers and teaching hospitals rely on J-1 and other visa holders to provide the highest quality patient care and contribute to cutting edge medical research. Any policy change that could jeopardize their ability to remain in the United States to make these life-saving contributions should not be pursued. We urge DHS to exclude medical trainees and researchers from this proposal.

Thank you for your consideration of our comments. COBTH also strongly supports the in-depth comments submitted in a coalition letter led by the American Hospital Association and the Association of American Medical Colleges. Please do not hesitate to be in touch with any questions or if we can provide additional information on these or other matters.

Sincerely,

A handwritten signature in blue ink that reads "Patricia McMullin". The signature is fluid and cursive, with a large initial "P" and "M".

Patricia McMullin
Executive Director
Conference of Boston Teaching Hospitals