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The Honorable Chad Wolf  
Acting Secretary of Homeland Security  
U.S. Department of Homeland Security  
3801 Nebraska Avenue NW, Washington, DC 20395

**Re: Notice of proposed rulemaking titled “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,” DHS Docket No. ICEB–2019–0006**

The Genetics Society of America (GSA) represents more than five thousand scientists who use the tools of genetics and genomics to investigate a wide variety of biological questions and applications. International students and research scholars on F-1 and J-1 visas are critical members of our field and make enormous contributions to scientific, medical, agricultural, and economic progress in the United States. The GSA opposes the changes to these visa programs proposed by the Department of Homeland Security because they pose an undue burden on the scientific research community, a hindrance to research productivity in the US, and a serious threat to our longstanding scientific pre-eminence.

A 2018 [National Science Foundation survey](#) found that temporary visa holders constitute around a third of science doctoral students and more than half of postdoctoral researchers in scientific fields in the United States. These students and postdocs design, perform, and analyze the experiments on which US biomedical research progress is built.

In general, international students and exchange visitors have a large economic impact. For example international students provided an [estimated \\$41 billion direct import dollars](#) in 2018/19. But in the specific case of scientific researchers, international students and postdocs have an even broader impact through their discoveries and innovations. Scientific research and technological innovation in the US drives its [economic productivity](#). [Part of that success](#) has been due to this country’s ability to attract the best students and scientists in the world.

The proposed changes to F and J visa rules will make the US a less competitive destination for research students and postdoctoral scholars. In particular, the restriction of visa status to 2- or 4-year terms would represent a profound mismatch with normal scientific training and research periods. In 2018, the median time to degree for doctorate recipients in life sciences was [6.8 years](#). The new visa duration rules would mean that international PhD students in our field could no longer be granted a visa that would remain valid for the expected duration of their training program. Almost all these students would be required to undertake the expense and uncertainty of an application for extension of status or else return to their home country to apply for a new visa.

On average, postdoctoral periods last for [4.5 years](#), which exceeds the proposed J-1 visa term. An additional problem arises when J-1 research scholar program length is set by funding periods. For example, a postdoctoral researcher's appointment term is often set by their initial funding sources. Under the new rules, when a postdoctoral researcher receives new funding beyond their initial appointment term (through obtaining a fellowship or grant), they would need to interrupt their productive research to obtain a new visa or go through the extension of status procedure.

The estimated processing time for F and J extension of stay applications at the Texas Service Center is currently [6 to 8 months](#). Processing times have markedly increased in recent years, and there is no indication as to how USCIS will ensure timely processing of the additional 300,000 extension of stay requests that the DHS notice of rulemaking estimates will be submitted per year as a result of the new rules.

Under the new rules, international researchers and their families will face greater financial and logistical burdens. Biomedical PhD students and postdoctoral researchers in the US are paid small stipends that already place them under [financial stress during their many years of training](#). Moreover, the new rules will necessarily divert students and scholars from their research, thereby harming their careers and slowing the progress of their host labs and institutions and the scientific enterprise.

Given the substantial time and intellectual commitment required for scientific research, increased uncertainty in visa processing and approval will likely constitute too high a career risk for many prospective PhD students and postdoctoral researchers. This will result in scientists taking their talents to competing nations, resulting in the collective loss of our investment in their training and future research outputs.

Recognizing both the economic and health benefits of biomedical research, US policymakers have long provided bipartisan support for funding the National Institutes of Health and other federal research agencies. These efforts will be squandered if the US research enterprise is no longer able to train and recruit the most qualified graduate students and postdoctoral scholars.

We are concerned that the proposed rules would undermine scientific progress, making it even more difficult to accelerate the innovation needed in these challenging times.

**Genetics Society of America Executive Committee, on behalf of the Board of Directors**

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