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Office of Information and Regulatory Affairs  
Office of Management and Budget  
725 17th Street NW, Washington DC 20503

Submitted to Regulations.gov on behalf of Gary Hammer MD, PhD, President, Endocrine Society

Regarding DHS Docket No. 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"

On behalf of the Endocrine Society and our membership of over 18,000 scientists, clinicians and healthcare providers at all career stages, I am writing with significant concerns about the proposed rule *Establishing a Fixed Time Period of Admission and an Extension of Stay Procedures for Individuals in F, J and I Status*. This rule will have an immediate and devastating impact on access to care during a once-in-a-century pandemic and will undermine the long-term stability of endocrine healthcare workforce. In addition, the proposed rule would impose severe burdens on international scholars and further disrupt the biomedical research enterprise in the United States by discouraging scientists from pursuing graduate and postdoctoral research programs.

J-1 physicians are an essential part of the U.S. health care system. During their training, thousands of physicians provide supervised patient care at teaching hospitals. J-1 physicians who remain in the United States after training are more likely than U.S. citizen physicians to work in underserved areas, providing needed care to communities that lack it. Likewise, international graduate students and postdoctoral fellows on J and F visas contribute to cutting-edge research projects throughout their training that advance our nation's scientific and biomedical research priorities. International endocrine research trainees are making valuable contributions to our understanding of diabetes, hormone-sensitive and hormone-secreting cancers reproductive disorders, and other hormone-related conditions such as thyroid cancer and other rare endocrine diseases including adrenal cancer and neuroendocrine tumors. Nearly three-quarters of foreign-born noncitizen recipients of U.S. science and engineering doctorates remain in the U.S. for subsequent employment.

The proposal to eliminate "duration of status" (D/S) as an authorized period of stay and instead institute a fixed end date would disrupt the training of thousands of physicians and scientists who are already serving on our nation's health care and research teams. Fixed terms of stay would render thousands of J-1 physicians and J/F researchers unable to continue or complete their training programs. This would place further strains on health care teams that are forced to provide the same quality of care with fewer physicians while also impeding our research progress on national healthcare priorities.



The proposal also imposes new requirements on F nonimmigrant students wishing to transfer or change their course of study, with a lifetime limit on the number of programs completed. With the emerging trend towards multidisciplinary healthcare and research teams, professionals with a variety of training experiences are increasingly important to advancing complex research questions and improving healthcare outcomes. Arbitrary lifetime limitations on the number of programs that can be pursued will stifle innovation by denying access to multidisciplinary educational opportunities.

Finally, we are not aware of significant abuse of the current D/S limits for F and J visa holders, rendering the proposed rule arbitrary and ineffective while imposing significant burdens on trainees. We urge the Administration to withdraw the proposed rule. Failing to do so would prove catastrophic for the nation's research enterprise and health care system.