



Submitted via [www.regulations.gov](http://www.regulations.gov)

Sharon Hageman  
Acting Regulatory Unit Chief, Office of Policy and Planning  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
500 12th Street SW Washington, D.C. 20536

**Re: DHS Docket No. ICEB-2019-0006-0001, Comments in Response to 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 its 3,100 individual and more than 100 institutional members, the American Association for Dental Research (AADR) requests that the U.S. Department of Homeland Security (DHS) withdraw its latest rule, *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-2019-0006-0001)*, in its entirety and keep the current policy of duration of status (D/S) for nonimmigrant students in effect.

AADR is the largest division of the International Association for Dental Research (IADR). Importantly, the organization—like many U.S. scientific societies—has several student members who hold F and J visas, all of whom would be impacted by this proposed rule.

The DHS Federal Register notice importantly recognizes that exchange visitor and academic programs offer foreign nationals access to world-renowned faculty and cutting-edge resources and that “the United States fosters an environment that promotes the exchange of ideas and encourages open discussions...” Further, AADR appreciates that DHS notes that it values the benefits nonimmigrants bring to the United States.

However, the proposed rule itself is contradictory to these philosophies and would have negative, unintended consequences on students, U.S. colleges and universities, and the U.S. scientific pipeline.

The proposed rule only provides an admission period of two or four years for students. This timeframe is arbitrary and impractical as it fails to take into account the reality of the time needed to complete degrees in many academic programs, including Ph.D. programs, postdoctoral programs, and joint degree programs. The proposed change will likely create backlogs for U.S. Citizenship and Immigration Services (USCIS), resulting in longer processing times, uncertainty and disruption for students’ studies, and unnecessary economic burden on students.

+1.703.548.0066  
+1.703.548.1883  
1619 Duke Street  
Alexandria, VA 22314-3406, USA  
[www.aadr.org](http://www.aadr.org)

Additionally, this new policy could result in unintended harm to the U.S. scientific enterprise by discouraging international talent from applying to higher education courses in the United States and thereby weakening our competitiveness internationally. If prospective students do not have confidence that they will be able to see their academic program through to completion, they will look elsewhere, and the United States will lose a critical pipeline of advanced STEM knowledge and talent. The United States prides itself in our ability to recruit and retain international talent in fields including science and medicine, and this proposed rule change—compounded with other immigration policies from the administration—jeopardizes our ability to do that.

International students and exchange visitors contribute to a vibrant and diverse learning experience for all. They contribute to learning and research, to our communities, and to our country. The proposal to eliminate D/S will make it unnecessarily difficult for students to complete their studies in the United States and would place enormous strain on our legal immigration system as a whole.

AADR strongly urges DHS to withdraw this proposed rule in its entirety and requests that admission for the duration of status remain in effect. It is in our national interest to continue to attract top talent from around the world to our nation's research institutions; to lose them would be to our detriment.

Sincerely,



Christopher H. Fox, DMD, DMSc  
Chief Executive Officer  
American Association for Dental Research