



American Society of Plant Biologists

Cultivating a better future through plant biology research

October 20, 2020

The Honorable Chad Wolf
Acting Secretary of Homeland Security
Washington, D.C. 20528

Dear Acting Secretary Wolf,

On behalf of the thousands of members of the American Society of Plant Biologists (ASPB), we write to express our opposition to the proposal 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). This proposed rule will result in negative long-term impacts on the broader U.S. scientific enterprise, sending a signal that the United States is no longer open to international scholars and the many benefits that they bring to the nation.

The proposal put forward by U.S. Immigration and Customs Enforcement would impose two- or four-year limits on F and J visa holders and require students to apply for an extension of stay should they wish to remain beyond the designated period or, alternatively, to leave the country and reapply for admission at a port of entry. Most F and J visa holders will require five to eight years to complete their degrees, so these proposed limitations will create huge instability for thousands of students with no guarantee their applications for extensions will be processed by the time they need them to be. These delays and interruptions at the individual level will have knock-on impacts on the research projects in which the students and scholars are engaged, derailing and delaying them and wasting the resources devoted to them, often by other branches of the US Government. It is also worth noting that the shortcomings around program oversight and foreign espionage that this proposal purportedly targets are already addressed through the Student and Exchange Visitor Information System. Thus, the current “duration of status” process that allows F and J visa holders to remain in the U.S. provided they continue to make progress toward earning their degrees is highly preferred and would not duplicate efforts, wasting both time and money.

Moving forward with fixed time limits will discourage international scholars and result in a weakened U.S. innovation ecosystem. These visa programs enable the best and brightest international students to participate in and contribute to scientific discovery in the U.S. This is particularly true in the plant sciences where a notable number of our students, researchers,

faculty, and industry scientists are from overseas - individuals who have made stellar contributions to our field. Indeed, the plan of imposing an undue burden on our international scholars is in a sharp contrast to the efforts of other countries that are investing heavily in the plant and agricultural sciences to ensure food security for their populations. Going forward with this unnecessary plan will position the plant sciences in the US at an irreparable disadvantage. Depleting the plant sciences, specifically the fields of plant pathology, plant development, and plant genomics, from foreign talent, will force us to take a backseat in driving innovation and will decrease our chances of attracting the best and the brightest people who will be instrumental in conducting innovative applied and curiosity driven research in the plant sciences.

For generations the US has been the destination of choice for international scholars, generating billions of dollars in economic impact annually. Without access to the world's finest minds our scientific enterprise, economy, and global standing will suffer. We strongly urge you to rescind this proposed rule and consider the full ramifications of future actions taken that would undercut the US scientific enterprise and cause harm to high-value international students.

Sincerely,

Tessa Burch-Smith, PhD; Chair, ASPB Science Policy Committee

Judy Callis, PhD, Past President, ASPB

Katayoon Dehesh, PhD, President-elect, ASPB

Maureen McCann, PhD, President, ASPB

Crispin Taylor, PhD, CEO, ASPB