



ACS  
Chemistry for Life®

**AMERICAN CHEMICAL SOCIETY**

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May 23, 2018

The Honorable Carl C. Risch  
Assistant Secretary  
Bureau of Consular Affairs  
U.S. Department of State  
2201 C Street, NW 20520

Via electronic mail: [PRA\\_BurdenComments@state.gov](mailto:PRA_BurdenComments@state.gov)

Dear Assistant Secretary Risch:

As the world's largest scientific society, the American Chemical Society (ACS) understands, and supports, the need to balance national security interests with the need for scientific exchange. However, we believe the proposed supplemental information requirements published in the Federal Register on March 30, 2018 could have a profound impact on freedom of scientific exchange that negatively impacts the U.S. discovery and innovation ecosystem. [**Notice of Proposed Information Collection: Application for Immigrant Visa and Alien Registration** (Form DS-260, OMB Control Number 1405-0185) and **Notice of Proposed Information Collection: Application for Nonimmigrant Visa** (Form DS-160 and DS-156, OMB Control Number 1405-0182)].

As noted in ACS' public policy statement on Freedom of International Scientific Exchange: "Science and scholarship flourish when scientists collaboratively pursue and publish research and communicate without externally imposed impediment, limitation, or restriction." This open and fair exchange of information has created an innovative and productive environment for chemistry practitioners that are helping address some of our nation's, and the world's, most pressing challenges.

The following points are of particular concern to ACS related to the proposed changes to supplemental questions for visa applications:

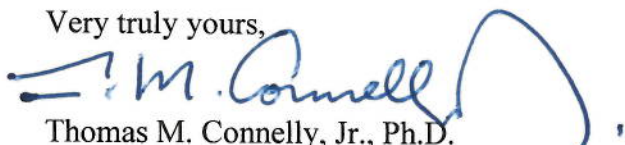
- The chemical sciences are inherently global by nature, and the proposed changes will greatly affect the mobility of scientists. The changes are likely to have a negative impact on those directly and indirectly impacted, and could lead to loss of valuable exchanges and collaborations which our nation needs, both scientifically and economically.

- Chemistry and chemical engineering graduate programs could be disproportionately affected. International students comprise 53% of chemical engineering and 40% of chemistry graduate students in U.S. universities.<sup>1</sup> The increased processing period for visa applicants makes it especially difficult for foreign students to gather the appropriate information and meet deadlines for college enrollment.
- Implementing these proposed changes will likely lead to large backlogs, further hindering scientific exchange. According to the Department of State's own estimates, the total estimated time burden is 1.8 million hours annually for immigrant applications, and 21 million hours annually for non-immigrant applications. These significant increases in time and volume would directly affect the capacity of offices to conduct reviews in a timely fashion and would very likely result in longer processing delays that ultimately drive potential foreign collaborators and students to other countries.
- For example, the increased visa processing time will affect attendance at the biannual ACS national meetings. These events attract 2,000-3,000 international attendees, as well as a large number of participants on temporary work and study assignments in the U.S. These meetings provide valuable venues for scientists around the world to share and advance their research. The inability to meet and interact may well have a detrimental impact on scientific advancement.
- Given the burden these new reporting requirements would place on visa applicants, chemists, chemical engineers, and other chemistry related professionals interested in working or studying in the U.S. will no doubt seek opportunities in countries with more favorable immigration regulations. This will result in the chemistry enterprise lacking access to the best talent globally and in U.S. universities failing to attract top international students – potentially undermining U.S. science leadership and the innovation infrastructure that has been a major generator of new U.S. jobs and economic growth.
- These proposals increase the possibility that other countries will implement retaliatory types of visa requirements. Such actions could inhibit the ability of U.S. scientists to travel abroad to attend meetings and other scientific gatherings, an important aspect to cultivate their scientific networks and to remain competitive in their research interests.

In sum, we believe the suggested changes will result in a high level of uncertainty that will affect business, higher education, scientific collaborations, tourism, and research.

We thank you for your consideration of these comments and offer the assistance of ACS to help craft approaches to facilitate international scientific exchange while also protecting our nation against threats.

Very truly yours,



Thomas M. Connelly, Jr., Ph.D.

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<sup>1</sup> NAFSA: Association of International Educators, [https://www.nafsa.org/File/ie\\_mayjun14\\_frontlines.pdf](https://www.nafsa.org/File/ie_mayjun14_frontlines.pdf).