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May 18, 2017

David T. Donahue

Deputy Assistant Secretary of State for Visa Services

United States Department of State

510 21st Street NW

Washington, DC 20006

RE: DOS-2017-0019

Dear Mr. Donahue and Colleagues:

We have read your currently proposed "Abstract of Proposed Collection" authorizing increased rigor in evaluating visa applicants with concern.

It is unclear from the regulation as published "who" the subset of worldwide visa applicants represent, but we have grave concerns on behalf of the Academy for Eating Disorders, as well as for the important convention and tourism industries throughout the United States, about the impact of increasing scrutiny of inbound tourists and delegates through unproductive and unnecessarily complex rules, regulations, and procedures.

The Academy for Eating Disorders is the leading international professional society of psychiatrists, psychologists, and physicians, and academic researchers focused on addressing the devastating mental disorders like anorexia, bulimia, binge eating disorders, and others.

We have made great progress in creating a global sharing of emerging empirical insight into the diagnosis and treatment of eating disorders. The increasing burden of the visa application process is threatening to slow down this vibrant and critical exchange, and to damage the very resources that AED depends upon to do its work.

In June of 2017 we will host almost 1000 delegates at our annual International Conference on Eating Disorders in Prague. Almost two thirds of those delegates are from outside of the United States, including Delegates from every country in Europe, many from South and Central America, and many from Australia, Asia, and the Middle East.

In 2018, ICED is contracted to occur in Chicago, Illinois, and in 2019 in New York, and our international delegates have begun expressing concern about their ability to obtain the needed visas to attend the conference. We have begun to consider moving the conference out of Chicago and New York in favor of meeting in Mexico or Canada, where the free movement of documented, legitimate travelers doesn't face the same impediments.

For AED, our meetings in New York and Chicago involve a direct expenditure of more than \$600,000 each for meeting space, hosted food and beverage events, and more. But they also each represent an expenditure by our delegates in each of the respective cities of conservatively another \$1.5 million – a combined impact of more than \$2 million per event.

The disruption to our conference planning, and the additional costs we will incur to break our existing contracts in these two cities is money diverted from the important work we are doing. The disruption to the revenue stream to the convention industry in New York and Chicago is very significant.

But it's important that you understand that AED is just one of many, many international associations that are facing the same considerations. The loss of even just 100 major events could represent a very conservative estimated economic shortfall for US convention cities of \$200 million – and that number could easily climb into the billions.

We respect and understand the important responsibility that you have to safeguard our national security, but we implore you to consider the impact unnecessary scrutiny will have on AED and more importantly on the convention and tourism sector of our economy.

Sincerely,



Elissa M. Myers, CAE, IOM
Executive Director