



ALLIANCE
for ACADEMIC INTERNAL MEDICINE

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October 23, 2020

The Honorable Chad Wolf
Acting Secretary of Homeland Security
U.S. Department of Homeland Security
3801 Nebraska Avenue NW
Washington DC 20395

Dear Acting Secretary Wolf:

On behalf of the Alliance for Academic Internal Medicine (AAIM), we appreciate the opportunity to provide comment on the U.S. Immigration and Customs Enforcement's (ICE) proposed change to the process for extending the period of authorized stay for certain nonimmigrant visa classifications (Docket #: ICEB-2019-0006).

The Alliance is the consortium of five academically-focused specialty organizations representing departments of internal medicine at medical schools and teaching hospitals in the United States and Canada. AAIM represents the entirety of the education and training programs in internal medicine, the largest specialty within all of medicine, accounting for approximately 25% of all graduate medical education (GME) trainees. AAIM members include department chairs and chiefs; clerkship, residency, and fellowship program directors; division chiefs; academic and business administrators; and other faculty and staff in departments of internal medicine and their divisions.

We respectfully oppose the administrative change that would eliminate "duration of status" as an authorized period of stay, because it will significantly disrupt the medical specialty and subspecialty training of thousands of foreign national physicians in the United States in J-1 visa status. This change will have severe implications for patient care in the United States.

As the United States remains in the grips of the coronavirus, the crisis has revealed a dangerously overburdened health care system that is stretched beyond its limit. We are facing an unprecedented strain on resources, including a growing physician shortage that predates the pandemic. Several states have attempted to recruit back retired physicians, hire previously unlicensed international medical graduates, and rush medical students into action to support the rising number of COVID-19 cases.

The J-1 physicians that would be affected by the proposed change have been thoroughly vetted, are already here providing supervised patient care, and are carefully monitored. Unlike most other nonimmigrant visa classifications, physicians in J-1 status are tracked constantly in the Student and Exchange Visitor Information System (SEVIS), a joint database of the U.S. Department of Homeland Security and the U.S. Department of State. As a division of Homeland Security, ICE already knows where these physicians are at all times and exactly when they complete their programs. SEVIS data includes dates of entry, periods of authorized training program participation, and definitive program end dates. SEVIS alerts ICE if any J-1 physician overstays or



otherwise potentially could fail to comply with the law. Therefore, the proposed rule is unnecessary. In addition, it will result in significant disruption to patient care at teaching hospitals across the United States. The patients most impacted will be those in underserved and rural areas and those in critical access points in large urban areas.

Now, more than ever, J-1 physicians play an essential role in ensuring accessible patient care. Jeopardizing the status of more than 12,000 doctors nationwide who are desperately needed to help fight this pandemic will have an immediate and devastating impact on our health care system, depriving Americans of life-saving care when they need it most. **We urge ICE to reconsider and to exclude J-1 physicians from this change.**

Again, thank you for the opportunity to provide feedback on the proposed change to the process for extending the period of authorized stay for certain nonimmigrant visa classifications. If you have any questions or need additional information, please contact AAIM President and CEO D. Craig Brater, MD at (703) 341-4540 or AAIM@im.org.

Sincerely,

L. James Nixon, MD
Chair, AAIM Board of Directors

D. Craig Brater, MD
AAIM President and CEO