

DR. THOMAS CONNELLY, JR.
Executive Director & CEO

1155 SIXTEENTH STREET N.W.
WASHINGTON, D.C. 20036
Phone (202) 872-4534

May 16, 2017

Mr. David T. Donahue
Acting Assistant Secretary
Bureau of Consular Affairs
U.S. Department of State

Via electronic mail: oira_submission@omb.eop.gov

Subject: Notice of Information Collection under OMB Emergency Review: Supplemental Questions for Visa Applicants (DS-5535); Docket Number: DOS-2017-0019

Dear Mr. Donahue:

As the world's largest scientific society, the American Chemical Society (ACS) recognizes the need to ensure our nation's security and defend itself from individuals considered a threat to U.S. citizens and interests. But the Society wishes to express concern about the potential impact of supplemental questions for visa applicants as announced in the 82 Federal Register 20956 on May 4, 2017 [Notice of Information Collection under OMB Emergency Review: Supplemental Questions for Visa Applicants (DS-5535)].

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.

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 could have a profoundly negative impact on freedom of scientific exchange. The Department of Homeland Security (DHS) already has in place several programs that have stopped thousands of people considered potential threats from boarding planes bound for the U.S. For example, according to a U.S. Government Accountability Office report ([GAO-17-216](#)), the DHS preclearance program stopped 22,000 high-risk air travelers in fiscal year 2015.

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.¹ 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.
- 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.
- The class of individuals affected by this request is vague and open-ended. The suggested changes will result in a high level of uncertainty that will affect business, higher education, scientific collaborations, tourism, and research.
- The Consular Affairs section of the State Department will likely require additional staffing to accommodate the increased requirements for visa reviews as stipulated in the Federal Register notice. In particular, we believe the new social media requirement and its lack of definition will require additional time and resources to investigate and analyze. Implementing these proposed changes on such short notice will likely lead to large backlogs, further hindering scientific exchange.

Given the burden these new restrictions 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, which would potentially undermine U.S. science leadership and its innovation infrastructure that has been a major generator of new jobs and economic growth.

Additionally, other countries may well implement retaliatory types of visa requirements, which could inhibit the ability of U.S. scientists to travel abroad to attend meetings and other scientific gatherings.

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,



Dr. Thomas M. Connelly, Jr.
Executive Director & CEO
American Chemical Society

¹ NAFSA: Association of International Educators, https://www.nafsa.org/File/ie_mayjun14_frontlines.pdf.