August 10, 2016

The Honorable Edward J. Ramotowski
Deputy Assistant Secretary for Visa Services
Bureau of Consular Affairs
U.S. Department of State
2201 C Street NW
Washington, D.C. 20520

Dear Deputy Assistant Secretary Ramotowski:

We, leaders and members of the higher education community, are writing to bring to your attention that the current visa renewal process is harming the United States. Requiring the renewal of academic visas abroad is disrupting scholarship, impeding research, and is an undue hardship that our international scholars currently endure.

Most students admitted on F visas are admitted under “duration of status” and they are allowed to stay in the country as long as they are a student, whether their visa expires or not. However, students who leave the country after their visa has expired have to apply to renew it before they can be re-admitted. Most nonimmigrant visas, including class F visas, must be renewed at a U.S. Embassy or Consulate office abroad and the Department of State recommends that applicants apply in their home country. The visa issuance and renewal process has been shortened over the past several years, and we are grateful for the Department of State’s efforts thus far to improve the process. However, requiring visa renewals be done abroad is impacting our scholars in a number of ways:

1. The time required to travel and renew academic visas abroad is an interruption to international student’s academic career, is detrimental to the undergraduate students in their classes, and stalls cutting-edge U.S. based research.

2. These students also incur the additional financial burden of having to travel back to their home country for visa renewal. For example, if a student attends an international conference or conducts research abroad, they often make an extra trip to their home country in order to renew their visa.

3. Students forgo international travel due to the financial and time commitment of renewing their visa. Therefore, students often elect not to attend international conferences or visit their loved ones back home.

For these reasons and many more, we urge the U.S. government to establish a program that would allow international students the opportunity to renew their visas within the U.S., prior to travel, rather than at an office abroad.
The Departments of State and Homeland Security, Secure Borders and Open Doors Advisory Committee made a similar recommendation in 2008.\footnote{Secure Borders and Open Doors Report, Secure Borders and Open Doors Advisory Committee, Departments of State and Homeland Security. http://www.dhs.gov/xlibrary/assets/hsac_SBODACreport508-compliant_version2.pdf} We propose the following specific actions:

1. Restore the domestic reissuance of visas program that is currently under suspension [69 FR 35121].

2. Include in-person interviews and all other necessary capabilities to process nonimmigrant visa applications from within the U.S.

3. Add class F visas to the list of eligible visas for domestic reissuance program. Amend 22 CFR Part 41.111(b) by adding “F” visas to those categories of visas that the Dept. of State can reissue in the United States. The revised 22 CFR Part 41.111(b)(2)(i) text would read as follows:

   “(i) Are currently maintaining status in the E, F, H, I, L, O, or P nonimmigrant category;”

(The 2001 regulatory change [66 FR 12737] that added O and P visas classifications to the list of eligible visas for revalidation in the U.S. could be used as a template to add class F visas.)

Benefits of restoring the domestic reissuance program and expanding it to incorporate class F visas include:

**Promotes the Progress of Federally Funded Research**

- Currently, international students funded by federal research dollars are hindered from conducting and representing high caliber U.S. research on the international stage.\footnote{Policy Implications of International Graduate Students and Postdoctoral Scholars in the United States, The National Academies. http://www.nap.edu/catalog/11289.html}

**Attract the World’s Best and Brightest**

- Between 2001 and 2014, the U.S. share of the “global market” of international students has declined by 29%.\footnote{Atlas of Student Mobility, Institute of International Education. http://www.iie.org/projectatlas}

- Talented foreign students are being enticed to study in other countries with more attractive student visa policies.\footnote{U.S. Immigration Policy, Council on Foreign Relations. http://www.cfr.org/immigration/us-immigration-policy/p20030}

**Saves Time and Money for International Students**

- Allowing domestic renewal of F visas would circumvent the unnecessary time and financial burden currently required for students to renew their academic student visas.\footnote{The Economic Benefit of International Students 2015, NAFSA: Association of International Educators. http://www.nafsa.org/_/File/_/econvalue2015_natl.pdf}

- Without these additional hardships, international students would be able to contribute more to the U.S. economy. According to NAFSA, in the 2014-2015 academic year, foreign students and their families supported 373,000 U.S. jobs and contributed $30.5 billion to the U.S. economy.\footnote{The Economic Benefit of International Students 2015, NAFSA: Association of International Educators. http://www.nafsa.org/_/File/_/econvalue2015_natl.pdf}
Domestic renewal will be able to uphold the security standards that are in place at our consulates abroad. This proposal takes the same screening process currently happening abroad and offers it in the U.S. We acknowledge that implementation of this proposal would take time; however, the benefits of a domestic renewal program would be well worth the effort. The process of renewing student visas should be more efficient.

**We urge the U.S. government to establish a program that would allow international students the opportunity to renew their visas within the U.S.**

Thank you for your continued efforts to support international students studying in the United States. We appreciate your consideration. Should you wish to speak with someone further regarding this issue, please feel free to contact James Scott, Interim Vice Provost of International Programs and Director of the International Center at the University of Missouri, ScottJ@missouri.edu.

With sincere thanks,

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   The Honorable John Holdren, Director, Office of Science and Technology Policy, White House
   The Honorable Antony Blinken, Deputy Secretary of State
   The Honorable Patrick Kennedy, Undersecretary of State for Management, Department of State
   The Honorable Michelle Bond, Assistant Secretary of Consular Affairs, Department of State