

# Population Association of America Association of Population Centers

## Office of Government and Public Affairs

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October 26, 2020

Office of Information and Regulatory Affairs

Office of Management and Budget

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Attention: Desk Officer, U.S. Immigration and Customs Enforcement, DHS

sent via email to: [dhsdeskofficer@omb.eop.gov](mailto:dhsdeskofficer@omb.eop.gov)

To whom it may concern:

On behalf of the over 3,000 behavioral and social scientists who are members of the Population Association of America (PAA) ([www.populationassociation.org](http://www.populationassociation.org)) and over 40 federally supported population centers nationwide comprising the Association of Population Centers (APC), we are writing to express our concerns regarding a proposed rule recently issued by the Department of Homeland Security (DHS), “Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media.”

The proposed rule would make sweeping, and we believe, unnecessary changes to the current methods of “duration of status” student visas by instituting a maximum period of admission of two to four years for individuals granted F and J visas, and 240 days for individuals granted I visas. The two-year limit would be imposed on individuals born in countries designated as state-sponsors of terrorism and citizens of countries with student and exchange visitor overstay rates over 10 percent.

The PAA and APC joins the higher education community in stating our opposition to this punitive, arbitrary proposal. Such a dramatic change would have a potentially chilling effect on the ability of international students to study in the United States. For the population sciences, which includes demography, economics, and sociology, we fear that such a policy would disrupt interdisciplinary research and research training activities and adversely affect the pipeline of new talent entering our field. Population research thrives not only with interdisciplinary interactions, but also international collaborations to fully analyze the effects that population change has on the health and well-being of individuals, communities, and the environment. Further, students who aspire to becoming population scientists require more than four years to complete the rigorous training programs offered at our nation’s most prestigious public and private universities.

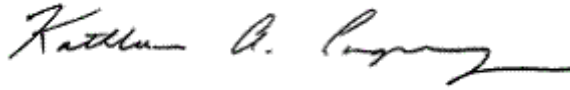
We urge the DHS to work with the higher education community and scientific societies like ours to make rationale changes to the student visa program that do not discourage international students from considering opportunities to study in the U.S. and to collaborate with our scientists.

Thank you for considering our views regarding this important matter.

Sincerely,



Eileen Crimmins,  
PAA President



Kathleen A. Cagney  
APC President