May 29, 2018

Carl C. Risch
Assistant Secretary
Bureau of Consular Affairs
U.S. Department of State
Washington, DC

REF: Docket Number: DOS-2018-0002

Dear Mr. Risch:

On behalf of TESOL International Association (TESOL), the world’s leading professional association for English language educators, along with EnglishUSA, and the Consortium of University & College Intensive English Programs (UCIEP), the trade & professional organizations comprised of more than 450 English language programs across the United States, we are writing to express our associations’ sincere concerns regarding the proposed changes to existing vetting procedures and information collection. TESOL, EnglishUSA, and UCIEP support the State Department’s mission to shape and sustain a peaceful, prosperous, just, and democratic world, and, of course, the State Department’s many educational and cultural programs. We also recognize the need for appropriate security measures in granting visas. We believe, however, that the proposal to require the submission of past social media activity and account information will cause an undue burden on international students and scholars, discourage them from traveling to the United States, and ultimately undermine U.S. security and prosperity.

TESOL represents over 11,000 English language education professionals from the United States and around the world. TESOL members work with English learners at all levels, including many international students studying in the United States. Many more TESOL members are educators and scholars from different countries who travel here to attend conferences, gain professional development experiences, and participate in other academic activities. EnglishUSA and UCIEP represent over 450 English language programs across the United States that serve as pathways for international students who are seeking degrees or professional certification and for students who come to the United States for shorter periods of time to improve their English and/or engage in cultural exchange.

International education and cultural exchange has long been an important asset to U.S. security and diplomatic interests. Students and educators who come to the United States for educational conferences and short-term or long-term studies not only bring invaluable skillsets and experiences that benefit American citizens, but they also return to their home countries having grown academically and having gained important first-hand experiences with U.S. citizens, an appreciation for our culture, and a respect for our institutions. These experiences are critical to advancing the mutual understanding that
enhances security and the collaboration necessary to a global economy. Moreover, international education has a major economic impact on the U.S. economy, contributing more than $36 billion in 2015 alone.

The proposed changes requiring nonimmigrant visa applicants to report identifiers used on social media platforms for the past five years are excessive. Although the notice indicates that the collection of social media information would only impact 710,000 U.S. visa applicants worldwide, this does not take into account the institutions across the United States that serve these students and academics. This policy, if implemented, would send a signal that those wishing to come to the U.S. for academic purposes are not welcome. This would have a detrimental economic impact to institutions who host these students, these institutions’ local communities, and the overall U.S. economy.

We recognize the need for a secure U.S. visa system, but the proposed changes could have a detrimental impact on international students and scholars. Current applicants already undergo a complex and extensive process to obtain a visa to enter the United States, and we are concerned that without additional resource the proposed vetting changes could further slow down the current visa application system. TESOL, EnglishUSA, and UCIEP encourage the U.S. State Department to strike a balance between appropriate security procedures and the positive economic and security benefits that accrue from legitimate travel and study in the United States.

Thank you for the opportunity to offer our comments on the collection of social media information that is being proposed for visa applicants seeking entry into the United States.

Sincerely,

Christopher Powers Cheryl Delk-Le Good Patti Juza
Executive Director Executive Director President
TESOL International Association EnglishUSA UCIEP