Department of State

RESPONSE TO PROPOSED RULE: DOS-2021-0019

February 28, 2022

Dear Ms. Cruz:

The National Postdoctoral Association is a 501(c)(3) charitable and educational non-profit organization whose mission is to improve the postdoctoral experience by supporting a culture of inclusive connection. Founded in 2003, our membership is composed of more than 230 U.S. research institutions and 22,000 individual postdoctoral researchers ("postdocs"). Collectively, we represent the interests of the 70,000 postdocs training across the nation in science and research fields.

We ask that the Department of State phase in over the next five years the increases to visa fees outlined in Proposed Rule DOS-2021-0019.

Foreign postdocs training and working in the US strengthen our nation through cutting-edge innovation, leadership and community outreach across all disciplines. These scholars predominantly use the J-1 visa, and to a lesser but yet significant extent, the H-1B and F-1/OPT visas. In most cases, J-1 and F-1 holders must pay visa application fees and related costs “out of pocket,” increasing the financial stress of relocating to the US under historically low wages and high costs of living. Thus, raising the costs of these visas by 53 to 63 percent at once places an undue burden on these scholars. It is even more inopportune timing given the recent delays in visa processing times and the loads placed on them by the pandemic. Many will see increased visa fees as a reason to not bring their experience, expertise and knowledge to the U.S, in detriment of our nation’s growth and development.

We strongly encourage this phase-in to be spread out over the course of the next 5 years so that this generation of researchers chooses to come to the US rather than one of our economic competitors. With the number of anticipated applications having dropped due to the pandemic and related changes to immigration policies and only slowly rising again, the proof of this burden is in your own statistics.
On behalf of the 70,000 scientists and researchers and hundreds of universities and research institutions across the nation with postdocs, thank you for your attention to this matter.

Sincerely,

Thomas P. Kimbis
Executive Director and Chief Executive Officer