



American Association of Collegiate Registrars and Admissions Officers
One Dupont Circle NW, Suite 520 | Washington, DC 20036-1135
(202) 293-9161 MAIN | (202) 872-8857 FAX | www.aacrao.org

May 25, 2018

The Honorable Carl C. Risch
Assistant Secretary, Bureau of Consular Affairs
U.S. Department of State
2201 C Street NW
Washington, DC 20520

**Re: Docket No. DOS-2108-0002, 60-Day Notice of Proposed Information Collection:
Application for Nonimmigrant Visa, 83 Fed. Reg. 13807 (March 30, 2018).**

Dear Assistant Secretary Risch:

On behalf of the American Association of Collegiate Registrars and Admissions Officers (AACRAO) and the institutions that we represent, I submit the following comments in response to the Notice of Proposed Information Collection, Docket No. DOS-2108-0002, issued by the Department of State in the March 30 Federal Register, concerning proposed changes to the application for nonimmigrant visas.

AACRAO is a nonprofit association of more than 11,000 campus enrollment officials who represent approximately 2,600 institutions and agencies in the United States and more than 40 countries worldwide. The vast majority of our individual members are campus officials with direct responsibility for admissions, recruiting, academic records, and registration functions. The campus administrative officials that comprise our membership range from front-line administrative staff to senior administrators with primary responsibility for enrollment planning, records management, administrative computing and other important operations central to the smooth and efficient administration of colleges and universities.

We find the Department of State's proposal to require the reporting of five years of information regarding over 20 social media platforms, email addresses, telephone numbers, and international travel history for visa applicants deeply troubling. AACRAO believes the requirements would be unnecessarily intrusive and burdensome and would have adverse effects on international participation in the American higher education community.

The new application requirements would also be a hindrance to American institutions' ability to attract the best and brightest young minds from across the world, as social media engagement has continued to become a more prevalent part of peoples' lives. International students, as well as professors and researchers, will be deterred from contributing to the laboratory of ideas that is American higher education.

According to the Department of State, more than 1 million international students were enrolled at American colleges and universities in 2017. The economic impact of these students to institutions of higher education is significant, as it's estimated that they contribute approximately \$35 billion to the U. S. economy on a yearly basis and support 450,000 jobs. A sharp decline in the number of international student visas already has many of America's colleges and universities concerned. The Department of State recently reported that the number of F-1 visas issued to foreign students seeking to attend college and other types of academic institutions in the United States decreased by 17% in the year that ended September 30, 2017.

Even a slight decrease in international student enrollment could have a drastic financial impact on colleges and universities as international students often receive little or no financial aid and pay higher out-of-state tuition costs. Moreover, these students are important to meet future U.S. workforce needs as approximately 25 percent of them are completing degrees in the STEM fields.


It should be noted that worldwide competition for international students is increasing. The U.S., as a destination, used to account for almost 50% of all international students worldwide, but that percentage has decreased dramatically and now about 24% of all international students come to the U.S. to complete their studies. Instead, students are going to other countries, such as Canada, Germany and Australia, which are making it easier for international students to stay in the country after they graduate and become part of the workforce.

We understand the importance of ensuring that Americans can feel safe in their homes, at work, or on campus and we strongly support efforts towards making the United States safe for everyone. However, we must also remain a welcoming country to international students and professionals who bring tremendous talents and skills to our campuses. These changes could threaten the United States' standing as the leader in science and technology and would hinder the country's ability to attract the most talented and brilliant minds from other nations.

Finally, these proposed changes would not only be unnecessary and intrusive burden for students and potential faculty, but also for the officers who work at consulates which are already understaffed and lacking the necessary resources.

We hope that these comments are well received and we look forward to working with you to guarantee our commitment to American interests, while ensuring the safety of all.

Sincerely,



Michael V. Reilly
Executive Director