

October 26, 2020

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Chad Wolf
Acting Secretary
U.S. Department of Homeland Security
Attn: DHS Docket No. ICEB-2019-0006
301 7th Street, NW
Washington, DC 20528

Dear Acting Secretary Wolf,

The Society of Hospital Medicine (SHM), representing the nation's hospitalists, offers the following comments on the proposed rule entitled *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 (DHS Docket No. ICEB-2019-0006)*. We are particularly concerned about the proposal to eliminate the "duration of status" and replace it with a fixed time period that is not to extend four years. **We strongly urge modification of the rule to explicitly exclude foreign national physicians and trainees who participate in the Department of State's Exchange Visitor Program in J-1 visa status.**

Hospitalists are clinicians whose professional focus is the general medical care of hospitalized patients. They manage the inpatient clinical care of their patients while working to enhance the performance of their hospitals and health systems. Due to their focus on providing care in the hospital setting, hospitalists have been the backbone of the nation's COVID-19 response, caring for hospitalized COVID-19 patients throughout the country. Many hospitalists are international medical graduates who trained in the U.S. under J-1 visas. Immigrant hospitalists provide high quality and lifesaving medical care to patients throughout the country and are an essential part of the hospital medicine workforce.

We strongly oppose the proposal to eliminate the duration of status standard associated with the J-1 visa and replace it with a fixed time period, which is not to exceed four years, or two years for select countries. It is critical for DHS to explicitly exclude physicians and physician trainees within the Department of State's Exchange Visitor Program (J-1 visas) from this rule change. Failure to exclude physicians and physician trainees from this rule change will have dramatic negative repercussions for the healthcare system at a time when it is already being pushed to its limits responding to the COVID-19 pandemic.

Physicians in training provide a significant amount of care in U.S. teaching hospitals and are critical elements of care teams across many settings. There are more than 12,000 foreign national physicians participating in the Exchange Visitor Program in J-1 visa status and they are already rigorously monitored and assessed. These trainees are pursuing residencies or fellowships and are participating in training programs that range from one to seven years, depending on the medical specialty or subspecialty. Before entering the country, these trainees are assessed by the Educational Commission for Foreign Medical Graduates (ECFMG), which certifies these trainees to enter Graduate Medical Education (GME) programs in the U.S. As J-1 physicians progress through training, they are required to renew their ECFMG sponsorship annually. However, if the proposal to eliminate the duration of status requirement is finalized without changes, numerous foreign national physicians will be unable to continue to care for patients as part of their training programs and the patients they serve will suffer as a result.

Enacting this policy change as proposed will cause significant disruption to the GME process, delay the contracting and placement of physician trainees, and create significant workforce challenges for the U.S. healthcare system overall. Our experience with COVID-19 has also laid bare many shortfalls in the healthcare system—chiefly, that we need more physicians, not fewer. Domestic training cannot currently keep up with demand and this proposal will ultimately hurt patients and restrict access to care around the country. Physician shortages, which will only be exacerbated by this proposal, will be particularly acute in underserved rural and urban areas where many J-1 physicians train and work. **We urge you to explicitly exclude foreign national physicians and trainees who participate in the Department of State’s Exchange Visitor Program in J-1 visa status.**

We appreciate the opportunity to comment on this proposed rule. If you have any questions, please contact Josh Boswell, Director of Government Relations at jboswell@hospitalmedicine.org.

Sincerely,

A handwritten signature in black ink that reads "Danielle Scheurer MD". The signature is written in a cursive style with a large, prominent "D" at the beginning.

Danielle Scheurer, MD, MSCR, SFHM
President, Society of Hospital Medicine