May 18, 2017

Department of State Desk Officer  
Office of Management and Budget (OMB)  
Bureau of Consular Affairs, Visa Office


Dear Ladies and Gentlemen:

On behalf of our 9,500 members including rheumatologists and health professionals who provide quality care to the more than 54 million Americans living with arthritis and other rheumatologic diseases, the American College of Rheumatology (ACR) appreciates the chance to provide comments on the proposed collection of information on visa applicants.

Rheumatologists provide ongoing care for patients with complex chronic and acute conditions that require specialized expertise. Rheumatologists provide face-to-face, primarily non-procedure-based care, and serve patients with serious conditions that can be difficult to diagnose and treat. Early and appropriate treatment by rheumatologists can control disease activity and prevent or slow disease progression, improve patient outcomes, and reduce the need for costly downstream procedures and care compared to care provided solely by primary care providers.

More than 1,700 members of the ACR are international members located outside of the United States, and many of these individuals collaborate internationally on a regular basis as scientific investigators, medical educators, and health care providers. Additionally, one of the main functions of the College includes an annual international scientific meeting each November.

It has come to our attention that our international members have experienced delays or rejections while applying for visas to travel to the United States for scientific purposes. The College is concerned that physicians and scientists will be unable to travel to the United States due to delays or rejections. This could reduce the effectiveness of the College to fulfill its mission, and could reduce scientific collaboration, innovation and medical education. The ACR suggests reducing possible delays or declined visas by allowing an exemption process for physicians and scientists who are invited to the United States for meetings, research, or patient care.

We understand the additional information collected will facilitate consular officer efforts to immediately apply more rigorous evaluation of these applicants for potential visa ineligibilities, but we are concerned the extreme visa vetting processes for those outside the 38 countries in
the U.S. visa-waiver program and anyone who has visited one of the six countries listed in the travel ban will have a negative impact on patient care, medical research, the education of health professionals, and international scientific collaboration.

Tens of thousands of health care providers from more than 100 countries come to the United States each year to exchange ideas to improve patient care throughout the world. In the field of rheumatology, over 3,880 rheumatologists who reside in countries outside the U.S. Visa Waiver Program travel to the United States annually to participate in the ACR’s Annual Scientific Meeting. These rheumatologists come to share their research. Their data represents over 25% (or 670 abstracts) presented during the meeting annually.

Rheumatologists provide innovative, life-changing care to patients, and undue burden imposed on the engagement of the international physician community could impede progress against diseases. We believe the global community must engage together in medical care and that delivering patient care, conducting research, participating in medical education and engaging in scientific discourse are national and international priorities. The ACR recommends national leaders take steps to eliminate barriers to scientific exchange and medical education.

The American College of Rheumatology appreciates the opportunity to provide comment on the *Notice of Information Collection Under OMB Emergency Review: Supplemental Questions for Visa Applicants*. We welcome continued discussions with the OMB and State Department regarding visa applicants. Please contact Kayla L. Amodeo, Director of Regulatory Affairs, at kamodeo@rheumatology.org or (202) 210-1797 if you have questions or if we can be of assistance.

Sincerely,

Sharad Lakhanpal, MBBS, MD
President, American College of Rheumatology