February 11, 2022

The Honorable Gina M. Raimondo
Secretary of Commerce
U.S. Department of Commerce
Washington, DC 20230

Dear Madam Secretary:

Thank you for the opportunity to share our thoughts on an updated National Travel and Tourism Strategy. The Alliance for International Exchange represents a diverse array of the sponsors, businesses, and industries that recruit, host, and support international exchange visitors in the United States under the F-1 and J-1 visas. We were heartened to note the importance the travel and tourism industry places on the J-1 visa program in the recent recommendations of the US Travel and Tourism Advisory Board.

We would like to outline the importance and impact of exchange programs and how the Administration, with the Department of Commerce’s assistance, can support the U.S. economy and our nation’s public diplomacy efforts as early as this spring.

Exchange visitors support U.S. national security by developing strong ties to and an affinity for the United States:

- Participants from more than 200 countries and territories visit the United States each year, many from countries critical to U.S. foreign policy, such as Brazil, China, India, Russia, Turkey, and Ukraine.
- Notable exchange alumni include 583 current or former heads of foreign governments, 84 Nobel Prize winners, 64 representatives to the United Nations, and 31 heads of international organizations.
- Au Pair (97%), Camp Counselor (93%), Intern/Trainee (94%), and Summer Work Travel (91%) exchange visitors gain a better understanding of American Culture.
- Most Au Pair (85%), Camp Counselor (98%), Intern/Trainee (96%), and Summer Work Travel (94%) participants develop connections with Americans during their stay, nearly all stay in touch with those connections after completion of their exchange program experience, and many return for work and/or visits.

International exchange participants support our economy by attending our schools and providing support for summer camps, small businesses in tourist areas, families in need of childcare, schools that need international teachers, and businesses that wish to provide training and internship experiences.

Unfortunately, the reduction in exchange visitors due to the ongoing pandemic has been detrimental to U.S. businesses and American families across the United States. For example:
• An estimated 6,500 jobs and $303 million were lost in 2020
• $1.23 billion in financial fallout that year by employers and others who sponsor and support cultural exchange visitors
• Out of 665 seasonal businesses and summer camps surveyed nationwide, 60 percent of respondents said that they lost revenue in 2021 and 60 percent had to reduce store hours or close business locations
• Businesses reported a total loss of $153,355,067 in 2021, averaging $320,827 per business
• 90 percent of respondents of a recent survey stated that they did not meet their peak staffing needs without J-1 exchange visitors, which contributed to staff burnout (87%) and lower quality of customer service or longer customer wait times (82%).

The processing of J-1 visas slowed considerably during the pandemic due to embassy closures and reduced capacity:

• Program sponsors in a 2021 survey indicated a 75 percent decrease in visa processing of their participants in 2021 as compared to the total number of exchange visas in 2019
• Intern, Camp, and Trainee programs have been hit particularly hard (85%, 80%, 77% respective declines).

While we had hoped that embassies would be operating by now at a somewhat increased capacity, J-visa applicants continue to face challenges obtaining their visas due to backlogs in visa processing and lengthy wait times for visa interviews. We understand that the U.S. Department of State has worked during the pandemic to adjust its guidelines and has sought to help facilitate exchange programs during this difficult time. We believe more can be done, however. We suggest the Administration take the below steps.

**Ensure exchange visas are prioritized.** Given the importance of these programs to our foreign policy and to address the economic crisis gripping American schools, employers, and families, exchange visitors should be a top priority. Prioritization should be extended to F-1 and both J-1 educational and cultural exchange visas. Visitors on all these programs are equally critical to U.S. foreign policy and our economy.

**Ensure adoption, and indefinite extension, of the visa interview waiver.** We applaud the Department of State’s extension of the visa interview waiver to non-immigrant visa applicants. The policy, however, is at the discretion of consular officers and, thus, has been inconsistently implemented. The waivers should be uniformly applied and mandatory across embassies as they not only serve to advance foreign policy goals, but also aid consular staff in reducing the volume of in-person visa processing. Also, because we do not know yet how long the pandemic will last and are sure that the impact will continue for some time, interview waivers for these applicants should be waived indefinitely. Doing so
would allow program sponsors and others to plan appropriately. The Department of State should seek input from the exchange community and provide adequate lead time before interviews are restored. Finally, implementing the interview waiver now across all embassies would yield immediate benefits, with many more applicants able to reach the U.S. as early as this spring. That would help exchange programs return to pre-pandemic participation levels.

**Modernize visa processing and advance DEIA through online interviews.** The Consular Affairs Bureau can facilitate international exchange by holding some visa application interviews online. That would also advance the Administration’s goal of fostering greater diversity, equity, inclusion, and accessibility among exchange participants. Ensuring that interviews are accessible to all interested applicants would lift the burden on applicants who live in remote areas, have disabilities, and/or are disproportionately impacted by the requirement of in-person interviews. Online interviews would also allow increased processing in more countries, which would help achieve a return to pre-pandemic participation in exchange programs.

**Increase transparency about conditions at embassies and facilitate processing.** Sponsors of exchange programs and their in-country partners are operating in a chaotic environment where embassy capacity limitations are unpredictable, and delays or cancellations are very sudden. That means that many months of work at considerable expense are routinely wasted unnecessarily. Limitations are often explained as “safety protocols,” but with the universal availability of vaccinations for embassy staff and other measures like making masking available for staff and visitors, it is difficult to understand what these protocols might be. Our community expects all embassies to be fully operational given the availability of vaccines and masks. The Department of State should conduct reviews of embassies that consistently process fewer visas, explain publicly the challenges and impediments they have discovered, and take steps to increase their capacity and processing capabilities. Greater transparency will help program sponsors and partners plan much better for the future.

**Surge resources to targeted embassies to meet demand.** The Department of State is aware of locations where there is a high demand for exchange visas based on past years and where visa applications are currently being filed. We urge the Department to implement a strategy where they provide additional resources for embassies in these areas that are experiencing increased demands. Because many programs are seasonal, the window for reviewing and granting visa applications is often very narrow. Therefore, time is of the essence and providing additional resources quickly is essential.

**Avoid Travel Bans in the Future and Accommodate Developing Countries.** We are all working to ensure the health and safety of exchange participants, our staff, and the communities that host them. While the U.S. has used country-specific travel bans to help stem the spread of Covid, the application of such bans has not necessarily reflected the
situation on the ground, nor have bans been consistently rescinded when the situation changes occurred. Moreover, some banned countries have had lower infection rates and higher vaccination rates than countries that were not banned. Additionally, the bans have had limited success, with Covid strains spreading rapidly throughout the United States despite the bans. The Administration is correct to focus now on an individual approach to travel by requiring vaccination and/or testing before entry into the United States. The Administration should continue that approach. We also recognize the current accommodations for visitors from countries where vaccination rates are low and urge that you continue to provide that exception.

The Alliance and its members greatly appreciate measures by the Departments of State and Commerce that have been taken to facilitate international exchange. With additional assistance through the above steps, the Administration can lessen the financial damage the Covid-19 pandemic has caused in the exchange community while strengthening our national security and economy.

Thank you for your consideration and for your strong support of international exchange programs.

Sincerely,

Ilir Zherka
Executive Director

Cc: Department of State Assistant Secretary Rena Bitter
Department of State Assistant Secretary Lee Satterfield