



April 16, 2020

Kenneth Cuccinelli
Acting Director
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
20 Massachusetts Avenue, NW
Washington, DC 20529

Dear Acting Director Cuccinelli:

On behalf of the American College of Physicians (ACP), I am writing to urge the U.S. Citizenship and Immigration Services (USCIS) to expedite entrance of international medical graduates who are citizens of other nations (non-US IMGs) into the country by accepting new requests for premium processing of H-1B visas. We also urge USCIS to temporarily extend visas and expedite approvals of extensions and changes of status for medical residents and physicians lawfully present in the U.S. so that their status is not negatively impacted by the COVID-19 pandemic. We are greatly concerned that not doing so will have serious healthcare repercussions as the U.S. tries to address this growing national health emergency.

The American College of Physicians is the largest medical specialty organization and the second-largest physician membership society in the United States. ACP members include 159,000 internal medicine physicians (internists) and related subspecialists including infectious diseases, pulmonary diseases, and critical care medicine. Internal medicine physicians are specialists who apply scientific knowledge and clinical expertise to the diagnosis, treatment, and compassionate care of adults across the spectrum from health to complex illness, including diagnostic evaluations, acute problem management, critical care, and long-term care for complex conditions. Internal medicine specialists are on the front lines of infection control, diagnosis, and treatment battling COVID-19 across the country. Internists treat many of the patients at greatest risk from COVID-19, including the elderly and patients with pre-existing conditions like diabetes, heart disease and asthma.

Last month, the National Resident Matching Program placed 4,222 non-U.S. IMGs into training positions that start on July 1, 2020. We need every one of these physicians to join their U.S. training programs on time. Before they enter U.S. training positions, IMGs are assessed by the Educational Commission for Foreign Medical Graduates (ECFMG). ECFMG's rigorous program for certifying IMGs includes verification of the authenticity of medical education credentials, including medical diplomas, directly with the issuing medical schools. Only IMGs who are certified by ECFMG can enter U.S. GME programs.

For categorical internal medicine, 2,116 (25.4% of 8,324) matched spots were filled with non-U.S. IMGs. We are aware of internal medicine training programs where more than 50% of incoming residents are on H-1B visas so the impact of a delayed start and possible denials would be devastating to their physician workforce capacity. Teaching hospitals rely on these medical residents to provide care; their prompt arrival and efficient entry into supervised clinical care is essential to sustain our health care workforce. When incoming medical residents are delayed or visas are denied it is disruptive to training programs and undermines front line physician staffing for provision of patient care. Our health system is already overwhelmed due to the COVID-19 pandemic. Any delay

in the arrival of these medical residents will exacerbate the problem and have a particularly negative impact on the most vulnerable patients at our nation's academic medical centers and safety-net facilities.

A vastly larger number of IMG's are currently serving on the front lines of U.S. healthcare, both under J-1 and H-1B training visas and in other forms. These physicians serve an integral role in the delivery of health care in the United States. IMGs provide health care for underserved populations in the United States and are often more willing than their U.S. medical graduate counterparts to practice in remote, rural areas. In addition, adherence to care improves when patients experience greater comfort and higher levels of patient satisfaction with care from physicians "who look like them." This element of diversity to the physician workforce is helpful and necessary to the health care for an increasingly diverse patient population. During this pandemic the non-U.S. IMG role is even more critical to care for the thousands of patients battling COVID-19.

We urge the USCIS to reconsider this suspension and instead prioritize H-1B premium processing for medical residents and physicians. We also request that USCIS prioritize change of status applications for those on O-1, J-1 and H-1B visas seeking to begin residency training on July 1, 2020. Thank you for your prompt attention to this important matter. Our country can't afford to delay processing of visas for medical residents and physicians during this critical time. If you have any questions, please contact Renee Butkus, Director Health Policy at rbutkus@acponline.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. McLean". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert M. McLean, MD, MACP
President