American College of Physicians
Leading Internal Medicine, Improving Lives

September 25, 2025

The Honorable Kristi Noem
Secretary
U.S. Department of Homeland Security
Washington, DC 20528

Re: Docket ICEB-2025-0001, 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

Dear Secretary Noem,

The American College of Physicians (ACP) offers the following comments on Proposed Rule, 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. As explained in more detail below, ACP believes that applying this rule to physicians would cause serious harm to medical care in the United States, is unnecessary, and should be modified to expressly exclude physicians.

ACP is the largest medical specialty organization and the second largest physician membership society in the United States. ACP members include 162,000 internal medicine physicians, related subspecialists, and medical students. Internal medicine physicians are specialists who apply scientific knowledge, clinical expertise, and compassion to the preventive, diagnostic, and therapeutic care of adults across the spectrum from health to complex illness.

We strongly oppose the proposed rule that would replace the long-standing "duration of status" policy with a fixed end date for certain categories of nonimmigrants. We urge you to exempt physicians in the Department of State's (DOS) Exchange Visitor Program on J-1 visas from this change, as failing to do so could have significant negative consequences for the U.S. healthcare system.

Each year, more than 17,000 J-1 physicians train in over 50 medical specialties and subspecialties nationwide. Before beginning training, international medical graduates (IMGs) must be certified by the Educational Commission for Foreign Medical Graduates (ECFMG), a division of Intealth. This rigorous certification process includes direct verification of the authenticity of medical education credentials with issuing medical schools. Only IMGs who meet these high standards are eligible to enter U.S. graduate medical education (GME) programs. Renewal of J-1 visa sponsorship through ECFMG is also required annually, involving a stringent process that reaffirms continued eligibility. The J-1 physicians affected by the proposed rule are therefore already thoroughly vetted and closely monitored.

Earlier this year, the National Resident Matching Program placed 6,653 non-U.S. IMGs into residency and fellowship positions beginning July 1, 2025. In categorical internal medicine alone, non-U.S. IMGs filled 3,575 positions—33.8% of the 10,941 available spots. Many of these physicians participate in the Exchange Visitor Program and train in J-1 visa status. Their programs last from one to seven years, depending on specialty or

subspecialty. Under the current duration of status provision, J-1 physicians extend their authorized stay in the United States concurrently with their annual visa sponsorship renewal with rigorous annual reconfirmation of eligibility through ECFMG. The proposed rule would instead require J-1 physicians to apply for Extensions of Status (EOS) through DHS, a process that can take months if not longer. This timeline is incompatible with uninterrupted contributions to clinical care by physicians and surgeons in training, where most residency and fellowship contracts are issued only three to five months before the July 1 start date. If implemented, the rule would create recurring delays for our contracted GME workforce, leaving thousands of J-1 physicians unable to continue clinical duties within their training programs on July 1 each year.

Importantly, IMGs—including those on J-1 and H-1B visas—play a critical role in the delivery of U.S. health care. They are disproportionately represented in underserved communities and rural areas where workforce shortages are most acute. Limiting their ability to train and practice would further jeopardize access to care for these populations.

The proposed change to the "duration of status" model would affect more than 17,000 physicians and disrupt patient care nationwide. It is also unnecessary, as J-1 physicians are already subject to stringent oversight and are not a source of visa overstays. For these reasons, ACP urges the Department to exempt physicians from the proposed rule. If retaining Duration of Status is not possible, ACP recommends that physician status be aligned with the full length of their residency or fellowship program to ensure continuity of training and prevent disruptions in patient care. Doing so will protect patients, preserve stability in graduate medical education, and avoid unintended harm to the U.S. health care system. If you have any questions, please contact Renee Butkus, Director Health Policy at rbutkus@acponline.org.

Sincerely,

Jason M. Goldman, MD, MACP
President