

to submit multiple I-129 forms on behalf of one petitioner to adjust the employee's work authorization timeline as new funding is secured.

Given the above circumstances, the ASBMB is concerned that the \$600 Asylum Program Fee will deter institutes of higher education and other nonprofit research organizations from supporting I-129 and I-140 petitions for their employees. This could increase the barriers to retaining scientific talent in the U.S. research workforce at a time when U.S. competitiveness is crucial for the nation to remain a global leader in technology and innovation.

The society recommends that DHS and USCIS explore alternative mechanisms for the Asylum Program Fee to relieve the anticipated burden on institutes of higher education and other nonprofit research organizations. The ASBMB encourages additional federal appropriations to be requested to cover humanitarian and asylum programs or higher education and other nonprofit research institutions to be exempt from the Asylum Program Fee.

Recommendation 2: Phase in scheduled fee increases

The ASBMB recommends that USCIS phase in the proposed fee increases over multiple fiscal years to soften the burden on nonprofit organizations and allow them to prepare future budgets accordingly. This will help prevent a reduction in petitions and/or reallocation of other important resources at these institutions.

Institutes of higher education and other nonprofit research organizations need time to adjust to the new fee schedule as proposed. The new fee schedule will increase the cost of commonly used petitions in the STEM immigration pathway by between 130% and 2,050%. After many years of stable fees, institutes of higher education and other nonprofit research organizations will struggle to afford the new fees and may have to reduce the number of petitions that they file or take from other important resources, hurting the American research enterprise.

Recommendation 3: Continue improving immigration processing

Efficient services from USCIS will allow the nation to reliably recruit and retain STEM talent from across the world. The ASBMB is hopeful that additional funds will allow USCIS to remove backlogs, combat fraudulent activity, and reduce processing times that currently burden temporary visa holders in the U.S. scientific workforce.

Under current policy, delays during J-1 waiver approval processing have timed-out individuals' J-statuses, causing their income to be paused for several weeks and/or months until the waiver is processed. Also, extreme backlogs for some petitions have necessitated priority processing if a decision is needed in accordance with the normal timelines. These circumstances need immediate correction.

It is vital that the USCIS continue to [address backlogs](#) in student visas (F-1) to prevent delays for students intending to pursue degrees in the U.S. These students are critical not only [to the nation's innovation and competitiveness](#) but also to revenue streams for many U.S. colleges and universities. Continuing the ongoing efforts to reach pre-pandemic processing levels should remain a high priority.

On behalf of the ASBMB's more than 10,000 scientists and researchers, thank you for your attention to this matter. Additional questions can be directed to Sarina Neote, Director of Public Affairs, at publicaffairs@asbmb.org.