

**Vince Malta**  
2020 President

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#### ADVOCACY GROUP

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Chief Advocacy Officer  
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**October 26, 2020**

The Honorable Chad Wolf  
Acting Secretary  
Department of Homeland Security  
2707 Martin Luther King Jr Ave SE  
Washington, DC 20528

**RE: DHS Docket No. ICEB-2019-0006: Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Non-immigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media**

Dear Mr. Secretary:

On behalf of the 1.4 million members of the National Association of REALTORS® (NAR), thank you for the opportunity to comment on the Department of Homeland Security's proposed rule "Establishing a Fixed Time Period of Admission an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media" (DHS Docket No. ICEB-2019-0006).

Under this proposed rule, F, J, and I visas would be limited to a maximum 2-year or 4-year time period, based on the length of period for a program of study, as well as additional factors that could limit the visa to a maximum of two years for:

- Students from a country with historic overstay rates of over 10 percent or those with broadly defined national security concerns.
- F-1 students in a language training program.
- Students whose institutions and exchange visitor programs do not fully participate in E-Verify.

DHS says it is proposing this rule for several reasons, including: bringing these programs in line with other visa programs that have a fixed time period; allowing DHS officials more opportunities to review an alien's status and whether they are complying with rules around their nonimmigrant status; and reducing and deterring fraud and abuse.

NAR supports a variety of visa programs because visa holders stimulate economic development, rent and purchase property, and create economic opportunity. While NAR supports increasing transparency, accountability and reducing fraud and abuse in visa programs, NAR is concerned these proposed restrictions will harm real estate markets that rely on these visa holders.

Over one million international students attend educational institutions in the U.S. They yield an estimated economic impact of \$41 billion and support more than 450,000 jobs across all sectors. In addition, these students and their families rent and purchase property, with a well-known economic ripple effect across ancillary industry sectors, such as furniture, appliances and moving resources.



According to NAR's 2020 International Buyer Report, the purchase of properties in the U.S. by foreign buyers with the intended use of student housing has declined from \$6.12B in 2017 to \$1.4B in 2020, a trend that follows the introduction of restrictions on other visa programs.

Instead of creating additional complications, the federal government should be doing more to encourage international students to study in the U.S. because of the economic benefits they bring with them.

Thank you for the opportunity to submit comments on the proposed rule. Now, in an era of increased global connection, it is imperative that the United States maintain its ability to attract students and real estate investors throughout the world, in order to enhance global property ownership.

Sincerely

A handwritten signature in black ink, appearing to read "Vince Malta", written in a cursive style.

Vince Malta

2020 President, National Association of REALTORS®