



APSA Comments on Proposed Changes to Visa Applicant Disclosure Requirements

The American Political Science Association is writing to express concern about the **Notice of Information Collection under OMB Emergency Review: Supplemental Questions for Visa Applicants (DS-5535)**, 82 *Federal Register* 20956, published on May 4, 2017. The notice imposes new disclosure requirements on a subset of visa applicants with vaguely worded provisions that threaten a chilling effect on the free exchange of ideas through international scholarly exchange and collaboration.

The American Political Science Association is a scholarly association with over 13,000 members worldwide. APSA brings together political scientists from all fields of inquiry, regions, and occupational endeavors within and outside academe to deepen our understanding of politics, democracy, and citizenship throughout the world. The association hosts an annual meeting with broad attendance from international members and it supports international scholarly exchange and collaboration through an array of programs and initiatives.

We understand that the notice suggests the affected population required to adhere to new supplemental disclosure requirements would be small and includes consideration of existing authorities requiring non-discrimination in visa processing. However, the form DS-5535 does not make sufficiently clear the criteria used for identifying the subset of visa applications who must provide additional information for evaluation of “terrorism or other national security-related visa ineligibilities.” This uncertainty for visa applicants may introduce a chilling effect on many international travelers seeking to visit the United States, including those engaged in academic research and exchange. Without further details about the implementation of the more rigorous evaluation processes and the standards for review and visa denial, some scholars may be dissuaded from visiting the United States to pursue academic initiatives, with implications for the robust free exchange of ideas and the United States’ role as a leader in academic excellence.

We are also concerned that the proposal would significantly increase the burden of disclosure on select individuals looking to travel to the United States by increasing the timeframe of disclosure of past travel from five years to 15 years and imposing other disclosure requirements that are vaguely worded and lack clarity on privacy protections. Especially without further clarification on review standards, this long timeframe and the requirement to provide documentation about any funding for previous travel during this period may present added burdens for scholars who travel frequently for work and rely on a variety of grants and outside funds to do so. The travel disclosure requirements also may impact scholars who have conducted fieldwork and fact-finding in regions deemed by authorities to present security concerns. In addition, the requirement to disclose social media identifiers similarly introduces a number of concerns, including about the lack of information on how authorities will store social media identifiers and preserve privacy, as well as the potential impact on scholars overseas who have used social media to exercise free expression of academic viewpoints. Finally, lack of clarity on the timeframe for evaluating additional disclosures introduces risk of delays in travel that could affect meeting attendance and deadline-sensitive research collaborations and academic study.

In sum, we are concerned the ambiguity regarding affected populations and the increased burdens and uncertainties surrounding these proposed disclosure requirements will impede the free exchange of ideas through international exchange and collaboration, including through professional academic association meetings and programs. We thus ask the Department of State to reconsider the current proposal as worded and the detriment it may have on academic freedom and scholarly collaboration.