



Melissa Arbuckle, MD, PhD  
**President**

October 25, 2020

Mike Travis, MD  
**President-elect**

The Honorable Chad Wolf  
Acting Secretary  
U.S. Department of Homeland Security  
Washington, DC 20528

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Dear Acting Secretary Wolf:

On behalf of the American Association of Directors of Psychiatric Residency Training (AADPRT), an organization that represents physicians who are in-charge of psychiatry residency and subspecialty fellowship programs, we are taking this opportunity to comment on the proposed rule, "*Establishing a Fixed Time Period of Admission and an Extension of Stay Procedures for Individuals in F, J and I Status.*" Briefly stated, AADPRT strongly opposes any proposed changes that may result in elimination of duration of status for an authorized period of stay for international medical graduate physicians (IMGs) on J-1 visas.

IMG physicians constitute approximately 33% of our physician taskforce and have been an irreplaceable and vital resource for providing access to psychiatric care. IMG physicians have played a critical role in providing health care, especially in underserved areas with higher rates of pre-existing chronic disease, which as you are aware, has been correlated with higher morbidity and mortality rates. A pre-existing shortage of physicians providing mental health services, has become much more apparent during this unprecedented and unsettling pandemic.

Training of physicians in psychiatry lasts 4 to 6 years, depending on whether additional subspecialty training is pursued. Over the years, a little over 400 psychiatrists are on J1 visas annually, with 393 such physicians on a J1 visa this year. Currently, these physicians on J1 visas are able to maintain their authorized US stay consistent with the duration of training and per visa renewal through the ECFMG. The proposed changes to the duration of status would unnecessarily require thousands of physicians to submit additional applications each year to the US government for such renewals to complete their training. The extended timeline for such approvals (up to several months), in addition to other rigorous timelines related to physician licensing renewals and contract renewals, will make it impossible for all these physicians to continue their training on July 1 each year. This would worsen the availability of an already under-resourced and understaffed psychiatric workforce, which would have further detrimental effects on managing mental health and behavioral health needs for our populations. This will particularly impact individuals in medically underserved areas, and those undergoing treatment for severe and persistent mental illness, and substance use disorders, including individuals suffering throughout the opioid epidemic.

Given the detrimental downstream effects in providing psychiatric care for the US population with the proposed rule change, we strongly urge you exclude physicians on J1 visas from this proposed change in these unprecedented times of the COVID19 pandemic and opioid epidemic.

Sincerely,

Melissa Arbuckle, MD, PhD  
President, American Association of Directors of Psychiatric Residency Training