

June 28, 2018

To: Samantha Deshommes
Chief, Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington DC 20529

Re: Notice of Proposed Rule: "Removal of International Entrepreneur Parole Program." DHS Docket No. USCIS-2015-0006

Dear Chief Deshommes:

As the Department of Homeland Security considers rescinding the International Entrepreneur Parole Program rule, we write to express our concern that cutting off a pathway for immigrant entrepreneurs to legally come to the United States to start businesses would hamper economic growth and lead to fewer job opportunities for Americans.

For entrepreneurs around the world, the United States provides the best environment to start and grow a successful business. Yet absent the International Entrepreneur Parole Program, our immigration system does not provide a way for foreign-born job creators to come and start their companies here. America's failure in this regard is another country's opportunity: competitors in China, Singapore, Chile, Canada, Australia, and others are actively recruiting the world's future business leaders, and welcoming the talent that we regularly turn away.ⁱ

As some of the nation's leading economists, we recognize that immigrants serve as critical job creators in industries across the economy. Recent studies have shown that immigrants are behind an estimated 51 percent of our country's billion-dollar startups,ⁱⁱ that immigrants or their children founded more than 40 percent of America's Fortune 500 companies,ⁱⁱⁱ and that immigrants have higher rates of business ownership and new business formation than the US-born.^{iv}

According to New American Economy, implementing the International Entrepreneur Parole Program rule over the next 10 years would lead to the creation of anywhere from 135,240 to 429,714 new jobs in the United States.^v We urge the Department of Homeland Security to consider the consequences of turning away promising entrepreneurs at a time when international competition is at an all-time high—endangering our entrepreneurial edge and undermining the long-term health of our labor market. We oppose the decision to rescind the International Entrepreneur Parole Program rule.

Sincerely,

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¹ Ellen Huet, "How Tech Startup Founders Are Hacking Immigration," Bloomberg.com, accessed September 6, 2016, <http://www.bloomberg.com/news/articles/2016-02-10/how-tech-startup-founders-are-hacking-immigration>,

Dexter Roberts, "China's Factory Workers Head Home," Bloomberg.com, accessed October 11, 2016

<http://www.bloomberg.com/features/2016-chinese-migrants/>

ⁱⁱ Stuart Anderson, "Immigrants and Billion Dollar Startups," NFAP Policy Brief March, 2016. <http://nfap.com/wp-content/uploads/2016/03/Immigrants-and-Billion-Dollar-Startups.NFAP-Policy-Brief.March-2016.pdf>

ⁱⁱⁱ New American Economy, Entrepreneurship, newamericaneconomy.org, accessed June 18, 2018,

<https://www.newamericaneconomy.org/issues/entrepreneurship/>

^{iv} Robert Fairlie, "Immigrant Entrepreneurs and Small Business Owners, and their Access to Financial Capital," SBA Office of Advocacy Report, May 2012 <https://www.sba.gov/sites/default/files/rs396tot.pdf>

^v New American Economy, "Opportunity Lost: The Cost of Rescinding the International Entrepreneur Rule," newamericaneconomy.org, accessed June 27, 2018, <https://research.newamericaneconomy.org/report/international-entrepreneur-rule-what-might-it-mean-for-u-s-workers/>