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April 26, 2021

Tracy Renaud  
Acting Director  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
5900 Capital Gateway Drive  
Camp Springs, MD 20746

Re: Comment to "Identifying Barriers Across U.S. Citizenship and Immigration Services (USCIS) Benefits and Services; Request for Public Input," 86 Fed. Reg. 20398 (April 19, 2021) [DHS Docket No. USCIS-2021-0004]

Dear Acting Director Renaud,

Worldwide Employee Relocation Council (Worldwide ERC®) greatly appreciates the opportunity to submit comments in response to the "Identifying Barriers Across U.S. Citizenship and Immigration Services (USCIS) Benefits and Services; Request for Public Input," 86 Fed. Reg. 20398 (April 19, 2021) [DHS Docket No. USCIS-2021-0004].

Our association represents the people and businesses that facilitate the relocation and movement of global talent. Our over 5,400 professionals represent both corporations and service providers across Europe, the Middle East and Africa, Asia, and the Americas. Approximately 80 percent of our members are small- to medium-size businesses, and our members come from a diverse range of professions and industries, including human resources, recruiting, military, real estate, financial services, moving, counseling, and consulting. We are where work is going, and we advocate for public policies that [support work anywhere, are agile and are attentive](#) to employers and employees.

Immigration policies have always played a critical role in workforce mobility as the relocation of talent is a tool employers often deploy to fill critical skills gaps, as a complement to their American workforce. Research overwhelmingly shows that foreign-born talent makes significant contributions to U.S. economic growth and job creation. In fact, economists at Oxford University and Citi found that without immigrants contributing to the quantity and quality of the labor supply, the majority of the economic growth gains America saw between 2011 and 2016 following the recession would have been eliminated.<sup>1</sup> Further, in a recent Gallup survey, nearly 8 in 10 Americans said immigrants are good for the country – the highest level of support since Gallup began asking the question more than 50 years ago.<sup>2</sup>

The United States needs an immigration system that recognizes the value of immigrants and nonimmigrants and that is built for the modern, post-pandemic world. It must balance the needs of national security and U.S. economic growth; treat people fairly; support productivity; protect workers; encourage innovation; and be predictable and reliable to prevent abuse of the system.

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<sup>1</sup> Ian Goldin, Andrew Pitt, Benjamin Nabarro and Kathleen Boyle, "Migration and the Economy," *Citi and Oxford Martin School, Oxford University*, September 2018, as cited in Stuart Anderson, "Immigrants and America's Comeback from the COVID-19 Crisis," *National Foundation for American Policy*, July 2020.

<sup>2</sup> "Americans Want More, Not Less, Immigration for First Time," *Gallup*, July 2020.

While Worldwide ERC® is supporting several legislative initiatives to help accomplish this goal, we have two recommendations that we believe that U.S. Citizenship and Immigration Services can address over the longer-term.

**Modernize the Nonimmigrant and Immigrant Employment-Based System with e-Filing**– The government, employers and workers need a predictable and reliable system that provides the green cards and L, H-1B and other nonimmigrant visas needed to recruit, deploy, transfer and retain top world talent. USCIS must come into the 21<sup>st</sup> century and support a fully electronic system for filing, whether for electronic I-9s or employment-based petitions and applications. With the growth of remote work – [Worldwide ERC® recently found that 80 percent of employers](#) with over 10,000 employees anticipate over 50 percent of their workforce will work remotely on a permanent basis – e-filing becomes ever more important.

**Increase Certainty and Save Resources with Trusted Employer** – A Trusted Employer program should be a part of an electronic filing system and would help eliminate any abuses by pre-certifying immigration-compliant employers, saving resources for top government priorities. This program would also help increase business certainty in workforce planning and mobility. The Obama administration supported the concept of a Trusted Employer program similar to a Trusted Traveler or Pre-Check and a Trusted Shipper.

Worldwide ERC® and the workforce mobility and relocation professionals we represent look forward to working with you on improving worker immigration policy and again thank you for the opportunity to provide comments.

Should you have any questions regarding our comments, please do not hesitate to reach out to me by email at [rpeters@worldwideerc.org](mailto:rpeters@worldwideerc.org) or phone at 703-842-3400.

Sincerely,



Rebecca Peters  
Vice President, Member Engagement and Public Policy  
Worldwide ERC®

*Worldwide ERC® is the professional association for employee mobility professionals. Since 1964, Worldwide ERC® has been committed to connecting and educating workforce mobility professionals across the globe. A global not-for-profit organization, we are headquartered in Washington, D.C., with offices in London and Shanghai, and are the source of global mobility knowledge and innovation in talent management from Europe, the Middle East and Africa, to Asia and across the Americas.*