



June 27, 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

From: The Great Lakes Metro Chamber Coalition (GLMCC)  
1601 K St, NW  
Washington, DC 20006-1600

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

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Chief Deshommes:

On behalf of the Great Lakes Metro Chambers Coalition, please accept the following written comment on USCIS-2015-0006 "Removal of International Entrepreneur Parole Program." Immigrants have played a critical role in the revival of the Great Lakes region. They help to strengthen the quality of our talent pipeline, contribute to the local tax base, and create new businesses. Attracting and retaining the best talent and entrepreneurs is a top priority of the businesses represented by GLMCC. For these reasons, we are opposed to rescinding the International Entrepreneur Parole Program.

GLMCC is a collective of chambers of commerce across the Great Lakes region that jointly advocate on core federal policy issues. Since its founding in 2008, the coalition has become a leading and effective voice on federal policy. The Great Lakes region is one of the world's most important economic engines, covering all or parts of twelve states and two Canadian provinces. If our region was a nation, it would be the third largest economy in the world with a combined gross domestic product of more than \$5.7 trillion powered by one of the most dynamic advanced manufacturing sectors in the world.

A key part of our region's strength is the ability to attract highly-skilled immigrants that greatly contribute to job and economic growth. A 2017 report that GLMCC co-authored with the New American Economy concluded that an increase in immigrant populations in the Great Lakes region has led to a rebound in the manufacturing industry, fast growth in the healthcare sector, and the creation of nearly 250,000 working-class jobs.

The report, *New Americans and a New Direction: The Role of Immigrants in Reviving the Great Lakes Region* found:

- **Immigration fuels population growth in the Great Lakes region.** Immigrants accounted for half of regional population growth between 2000 and 2015 and offset population decline in nine out of the top 25 metros in the region. The Detroit and Pittsburgh metro areas, for instance, would have shrunk by more than 200,000 and 100,000 people, respectively, if not for the arrival of immigrants.

- **Immigrants play a particularly large role in the region as entrepreneurs.** Main Street businesses owned by immigrants created nearly 240,000 working-class jobs for U.S.-born workers between 2000 and 2015. Immigrants made up more than one of every 10 entrepreneurs in the region in 2015. Additionally, research compiled by Global Cleveland found that in 2010 alone, new immigrant business owners in Ohio had total net business income of \$1.3 billion, which represented 5.7% of all net business income in the state.

Data on the potential impact of the International Entrepreneur Parole Program, if it were implemented, estimates that over the next 10 years it would lead to the creation of, at a minimum, 135,240 new jobs in the U.S. Using the Department of Homeland Security's own estimates on industry distribution of IER firms, New American Economy anticipates roughly 85% will be technology or STEM-related firms that create far more jobs than the average business, meaning that as many as 429,714 new jobs could be created within the next decade as a result of the International Entrepreneur Parole Program.

GLMCC strongly believes in the need for comprehensive, long-term immigration reform. We need to remove the barriers and create incentives for attracting international talent to help Great Lakes companies compete in a global market place. Rescinding the International Entrepreneur Parole Program is a step in the wrong direction and we strongly oppose this decision.