October 24, 2025

Submitted via Regulations.gov

Business and Foreign Workers Division
Office of Policy & Strategy
US Citizenship and Immigration Services
US Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Re: **Notice of Proposed Rulemaking Establishing a Weighted Selection Process for Registrants and Petitioners Seeking to File Cap-Subject H-1B Petitions**
DHS Docket No. USCIS- 2025–0040
RIN 1615-AD01

Dear Office of Policy & Strategy,

I appreciate the opportunity to comment on the proposed rule from US Citizenship and Immigration Services (USCIS) establishing a Wage Level Lottery for cap-subject H-1B petitions. As a science and innovation think tank interested in accelerating U.S. scientific, technological, and industrial progress, IFP shares USCIS's goal of making the H-1B program more selective and endorses reforming (or preferably ending) the H-1B lottery, instead prioritizing workers who are most likely to contribute to the prosperity of the United States.

However, there is direct evidence from the government's own data that USCIS's proposal as written will not make the H-1B program meaningfully more selective. Instead, the rule as proposed will help H-1B-dependent employers, granting them *more* visas even though they pay *less* than other employers. By contrast, F-1 students, despite earning *more* than other initial cap-subject H-1Bs, would get *fewer* H-1Bs under the proposal, which would be a significant blow to the U.S. ability to attract and retain some of the most promising international talent.

Fortunately, the agency has a number of approaches available to it that would achieve its goals, and with significantly fewer drawbacks. With only minor changes, the agency can reduce the share of H-1Bs going to H-1B-dependent employers and outsourcing companies, increase the share of H-1Bs going to F-1 students (especially STEM PhDs), and more significantly increase the wages paid to H-1B beneficiaries.

In the comment below, I present the evidence that the proposed rule as written has major costs. I am also enclosing a report discussing the effects of the proposed rule in greater detail. Here are some of the important effects which thwart the stated intentions of the NPRM:

- The proposal helps H-1B-dependent employers and large outsourcing companies, even though they pay less than other H-1B employers because they are hiring in lower-paying, less-skilled occupations.

- The proposal reduces retention of some of the highest-skilled professionals, especially by reducing visas going to international students, even though F-1 students command higher initial salaries than other H-1Bs.
- The proposal only modestly changes the actual skill level of incoming H-1Bs.
- The proposal is susceptible to gaming and manipulation.

I next discuss how some simple alternatives would advance the goals USCIS has identified in its NPRM and increase the benefits of the rule to the US economy and to the federal government. I have two recommendations for the final rule:

1. **Revise lottery weights.** Lottery weights should be based on actual wages paid, not on prevailing wage levels. This would ensure the rule actually advances the objectives USCIS laid out in the NPRM by decreasing the share of H-1Bs captured by H-1B-dependent employers, increasing the share of H-1Bs going to F-1 students, and generally increasing the share of H-1Bs going to high-skilled, high-paid workers. DHS should consider geographical adjustments to account for variation in the cost of living and age adjustments to improve the long-term fiscal and economic outcomes of the rule. With or without those adjustments, weight by actual wages paid would significantly reduce the cost of the proposed rule and avoid unintentional consequences.

2. **Release public H-1B data.** The final rule should instruct USCIS to publicly release microdata on H-1B registrations, as well as microdata on I-129 filings, including information on the compensation and Wage Levels that beneficiaries were actually paid. With reliable public data, the public can assist the agency (and Congress) in understanding how employers are using the program, identifying unintended behavior, and further refining the selection process.

I. Wage Levels are not designed to compare workers across occupations.

The central flaw of the proposed rule is the conflation of *within-occupation seniority* with *cross-occupation skill*. The Department of Labor's Wage Level framework, which undergirds the entire edifice of the proposed weighted lottery, was never designed as a measure of relative skill across the economy. It is a compliance construct to verify that H-1B employers are paying a foreign worker no less than what a comparably situated U.S. worker with four wage levels (entry, qualified, experienced, and fully competent) representing gradations of seniority within a job classification, but do not establish a hierarchy of talent across occupations.

The agency's preamble states (correctly, in my view) that "salary is a reasonable proxy for skill." But the Wage Level system is not salary. Variation in Wage Levels at which I-129 petitions were were approved explains less than a quarter (22%) of the variation in actual salaries.[1] Rather, the Wage Level is a categorical abstraction that suppresses precisely the important variation that salary reveals: differences in skill levels across occupational categories.

[1] I-129 data obtained via FOIA by Bloomberg, linked to DOL disclosure data.

Consider some real examples:

- An acupuncturist making $68,000 in Ohio (Level IV) is not more skilled than a pediatric surgeon making $260,000 helping children in the Pennsylvania rustbelt (Level I)[2] and the Wage Level is a terrible basis for awarding them four times as many chances at an H-1B.
- An IT worker doing tech support in Phoenix, Arizona making $95,000 (Level II) is not more skilled than a computer hardware engineer getting their first job at the new TSMC semiconductor fab making $130,000 (Level I).[3]
- An HR specialist making $85,000 in Huntsville, Alabama (Level III) is not more skilled than an aerospace engineer down the street making $140,000 supporting the defense industrial base (Level II).[4]

These are not anomalies; they are the logical and intended outcome of a system that was designed to measure seniority within occupation rather than value across occupations.

A Wage Level IV job is not necessarily a high-skilled job. A Wage Level I job is not necessarily a low-skilled job. In fact, the data show many Level IV positions reflect salaries far below the median American wage, while some Level I and II jobs are among the best-paid in the economy.

From FY2021-FY2024, hundreds of I-129s were filed and approved for cap-subject H-1B beneficiaries at Wage Levels III or IV but making less than $60,000.[5] Over the same time period, hundreds of I-129s were filed and approved each year for cap-subject H-1Bs making more than $150,000 at Wage Level I.[6]

The agency is proposing to deploy a framework meant to ensure wage flooring as an index of merit. The practical effect, as we will see, runs contrary to the agency's stated objective of rewarding "the highest wage or highest skill."

II. Weighting on Wage Levels will help large outsourcing companies and other H-1B-dependent employers, even though they pay less than other companies.

The clearest beneficiaries of the proposed weighting scheme are not the high-wage innovators whom USCIS says it intends to favor, but the very employers whose use of the program has been criticized for wage arbitrage and undercutting US workers.[7] Simulations

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[2] According to DOL's OFLC Wage Search, from 7/2025-6/2026, the Level 4 Wage for an acupuncturist in the Southern Ohio nonmetropolitan area is $65,603 and a Level 2 Wage for a pediatric surgeon in Allentown-Bethlehem-Easton, PA-NJ is $271,898.
[3] The Level 2 Wage for computer systems engineers/architects in Phoenix-Mesa-Chandler, AZ is $93,538. The Level 2 Wage for a computer hardware engineer in the same metro is $130,874.
[4] The Level 3 Wage for human resource specialists in Huntsville, AL is $81,952, while the Level 3 Wage for aerospace engineers in Huntsville is $140,878.
[5] I-129 data obtained via FOIA by Bloomberg, linked to DOL disclosure data.
[6] Ibid.
[7] See Eric Fan and Marie Patino, "H-1B Middlemen Bring Cheap Labor to Citi, Capitol One," *Bloomberg*, June 27, 2025 for a data-based recent example.

using USCIS and DOL data show that if the rule had been in effect over the FY2021-FY2024 period, large outsourcers[8] would have received 10 percent more visas than under the status quo while H-1B-dependent employers writ large would have received 3 percent more visas than under the status quo.[9] Large IT outsourcing firms like Infosys, Wipro, Tata, and Cognizant stand to gain under a Wage Level-weighted lottery precisely because of the way the Wage Level system is constructed.

Large outsourcers and other H-1B-dependent employers pay less than other H-1B employers, but they get certified at higher Wage Levels. That's because they use H-1Bs for workers in lower-skilled, lower-paid occupations.

Across all registrations from all employers, most beneficiaries are offered salaries at Wage Levels I and II. This is true at both outsourcers and nonoutsourcers and by H-1B dependent employers and non-dependent employers alike. However, the outsourcers and H-1B-dependent employers file for far fewer Wage Level I workers (at many of the large outsourcing companies, less than 1% of their H-1Bs are at Level I) than other employers and more Wage Level II and III workers. The result is that these companies consistently file for workers at higher Wage Levels.

In the most recent year we have data, FY2024, for example, the average Wage Level was 2.24 for outsourcers compared to only 1.89 for other companies.[10] While 2024 was a strange year for having more multiple registrations, that is not affecting the result. For all years for which we have data (FY2021-2024), the outsourcers' I-129s were approved at higher Wage Levels than other companies. The same can be said for H-1Bs filed by H-1B-dependent companies; in every year for which we have data, the dependent companies filed at higher Wage Levels than other companies.

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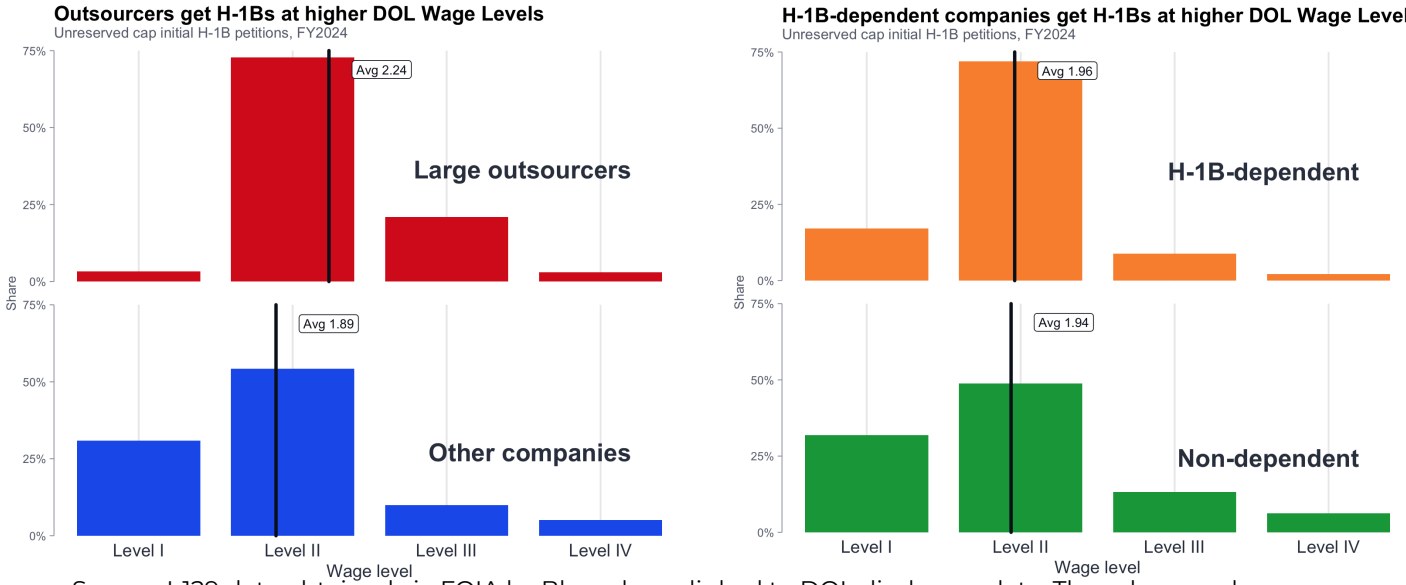
[8] Defined as those companies that register for at least 2,000 H-1Bs and have an outsourcing business model.

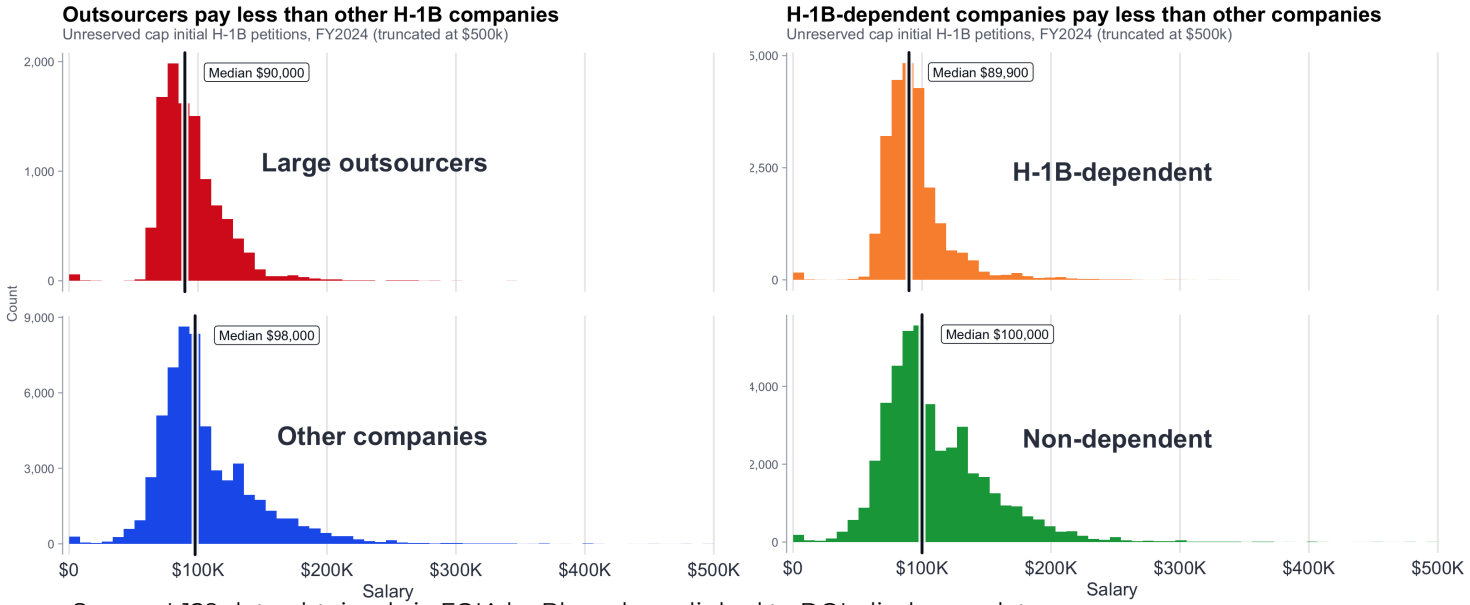
[9] Jeremy Neufeld, "The 'Wage Level' Mirage," Institute for Progress, September 25, 2025. Also attached. Some of the precise percentage figures are modestly different because of minor data cleaning and because of random error in the simulations.

[10] I-129 data obtained via FOIA by Bloomberg, linked to DOL disclosure data.



Source: I-129 data obtained via FOIA by Bloomberg, linked to DOL disclosure data. These bar graphs reflect the Wage Levels in the certified LCAs filed with H-1B petitions.

And at the same time as these firms systematically filed H-1B workers at higher Wage Levels, they were offering lower salaries because their workers are in lower-paid occupation categories. The large outsourcers paid a median salary in FY2024 of $90,000, compared to $98,000 paid by other companies. Among H-1B-dependent employers, the median salary in FY2024 was $89,900, compared to $100,000 among other companies. Again, while the precise numbers vary by year, it is a consistent pattern that outsourcers and other dependent companies pay less, while getting approved at higher Wage Levels in every year for which we have data.[11]



Source: I-129 data obtained via FOIA by Bloomberg, linked to DOL disclosure data.

[11] Ibid.

The mechanism is straightforward. Outsourcers rely on H-1Bs for routine IT support and IT maintenance roles, occupations whose prevailing wages are low but whose employees are older and therefore slotted into higher "experience" levels. Most other firms, particularly those engaged in research, engineering, or advanced product development, file many more petitions at Level I, reflecting early-career hires who are nonetheless paid substantially more in absolute terms. Under the proposed weighting, that difference in level, not in pay, would dominate selection outcomes.

The consequence is not hypothetical. In the simulation results, it formalizes and strengthens the existing bias in favor of mid-career, lower-paid contractors and against genuinely high-skill, high-wage roles. Outsourcers and H-1B-dependent employers are favored by the proposed rule, precisely because they specialize in lower-paying occupations with a large reservoir of later-career workers abroad.[12]

III. Damages the international student pipeline, even though F-1 students command higher initial salaries than other H-1Bs.

The other, no less perverse, consequence of weighting on Wage Levels is its penalty on early-career, U.S.-educated international talent. They are, in every measurable sense, the archetype of the "high-skill" worker the H-1B program should retain. High-skilled immigrants who first come to the United States as F-1 students are more innovative than other high-skilled immigrants[13] and they are more likely to found successful startups.[14] Of the immigrant founders of America's top AI startups, 70% first came as students.[15]

Yet this pipeline would lose out under the proposed rule.

The reason is structural. Wage Levels measure *seniority* within an occupation. Recent graduates, by definition, are early-career. Their offers are therefore overwhelmingly at Level I or II, even when their salaries are six-figure offers in frontier sectors. In each year from FY 2021 to FY 2024, international students transitioning from F-1 to H-1B status earned higher salaries on average than non-F-1 workers, but were far more likely to be approved at the lowest wage levels.

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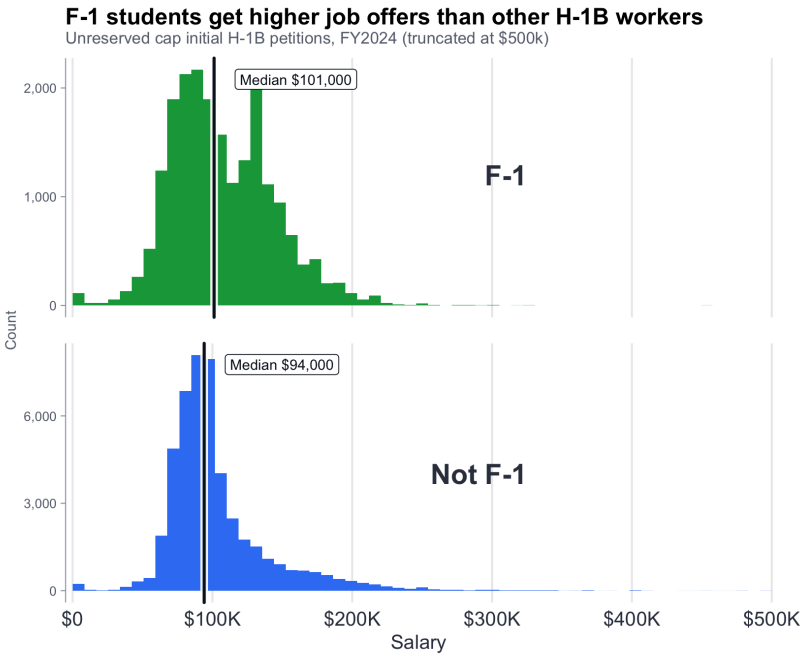
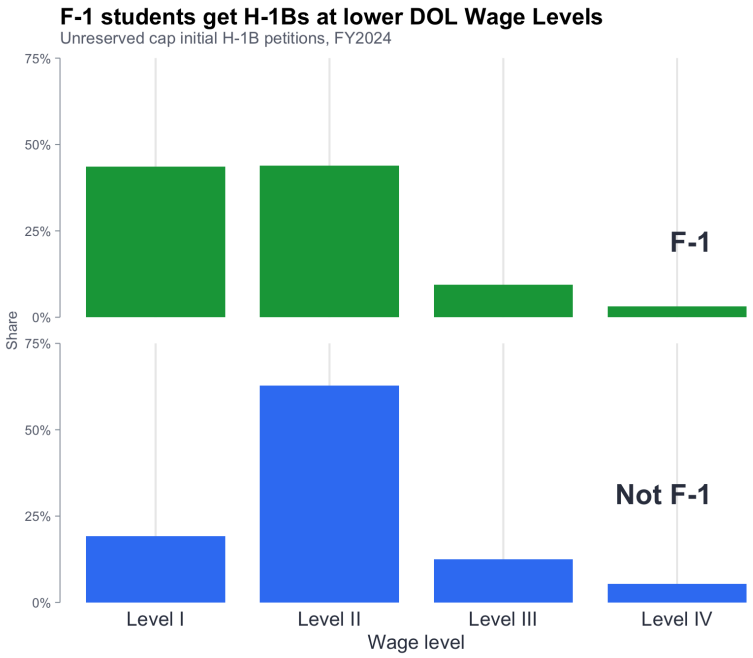
[12] Neufeld, "Wage Level Mirage."
[13] Jennifer Hunt, "Which immigrants are most innovative and entrepreneurial? Distinctions by entry visa." Journal of Labor Economics 29(3), 2011: 417-457.
[14] Natee Amornsiripanitch, Paul A. Gompers, George Hu, and Kaushik Vasudevan, "Getting schooled: Universities and VC-backed immigrant entrepreneurs," Research Policy 52, no. 7 (2023): 104782.
[15] Tina Huang, Zachary Arnold, and Remco Zwetsloot, "Most of America's 'Most Promising' AI Startups Have Immigrant Founders," Center for Security and Emerging Technology (October 2020).





Source: I-129 data obtained via FOIA by Bloomberg, linked to DOL disclosure data.

In the most recent year for which we have data, the median salary for F-1 students is higher than other H-1B workers, at $101,000 compared to only $94,000. And at the same time, those F-1 students are at lower Wage Levels, with nearly twice the number of Level Is as other H-1Bs. That pattern is consistent in every year for which we have data.[16]

Under the current random lottery, international graduates of U.S. institutions accounted for just over 40,000 of the initial cap-subject H-1Bs each year. Had the Wage Level-weighted system been in effect from FY 2021–2024, their share would have fallen by 7 percent.[17] In short, the direction of bias is unambiguous: the rule would transfer visas away from U.S.-educated scientists, engineers, and researchers toward older workers in lower-paying occupations.

IV. The proposal is more susceptible to gaming and manipulation compared to alternatives.

Explicitly prioritizing Wage Levels will encourage employers to manipulate them, which they can achieve without actually raising salaries. The largest new incentive will be to reclassify a job into an occupational category with a lower prevailing wage and enjoy more lottery entries for the same salary. Because the Department of Labor's wage data are organized by detailed occupation and geography, even small adjustments to job titles or worksites can yield large differences in the assigned

[16] I-129 data obtained via FOIA by Bloomberg, linked to DOL disclosure data.
[17] Neufeld, "Wage Level Mirage."

Level, and therefore the chances at securing an H-1B. The result is that employers can legally "upgrade" a filing without raising pay.

While the Department of Labor can enforce the integrity of occupational classifications through labor certification, DHS must account for the fact that DOL has only limited means, limited resources, and limited ability to observe the actual job duties practiced on the job. Furthermore some of these Level upgrades will be totally legal because of the intrinsically ambiguous nature of discrete job classification in a complex, diverse, and changing labor market.

The opportunities for manipulation are not subtle. For example, the Occupational Employment and Wage Statistics data treat "Computer Programmers" as a separate occupation from "Software Developers." In San Francisco, a company with a coding job paying $155,000 could change its designation for the role from Software Developer, which would put the position at Level I, to Computer Programmer, which would put it at Level IV, instantly quadrupling their lottery chances.[18] The same dynamic holds across many occupational pairs. In Philadelphia, for example, a "Marketing Manager" earning $103,000 would be Level I, but a "Market Research Analyst and Marketing Specialist" earning the same would be Level IV.

While the roles are distinct according to DOL guidance, it can be difficult for the agency to enforce these subtle differences. The artificiality of occupational classifications makes this form of gaming all but inevitable, at least so long as weights are based on occupational categories.

V. Recommendation #1: Weight based on actual wages paid. Consider adjusting for geography and age. Also consider using more bins and steeper weights.

The agency's stated goal in the NPRM is "the allocation of H-1B visas to higher skilled and higher paid aliens, while maintaining the opportunity for employers to secure H-1B workers at all wage levels." That aim is sound. A straightforward alternative exists: weight entries by actual compensation offered to the beneficiary, adjusted as needed for geography and age.

Using actual wages as the selection metric would directly align the program's incentives with the agency's stated objectives and avoid all of the costs described above. Simulations show that selection based on compensation, with or without any of the adjustments for geography or age that I suggest for consideration, would advance the following objectives (unlike a Wage Level-based approach):

- Would decrease the share of H-1Bs going to outsourcers and H-1B-dependent companies.
- Would increase the share of H-1Bs going to F-1 students, especially PhDs.[19]

[18] According to OFLC, Wage Level 4 for a Computer Programmer in San Francisco-Oakland-Fremont, CA is $153,317, while for Wage Level 2 Software Developers, it is $161,637.

[19] The fact that compensation-based prioritization would increase the share of H-1Bs going to students may be counterintuitive, but it is borne out consistently in the data and can be

- Would increase the wages paid to H-1B workers more than the NPRM, while "maintaining the opportunity for employers to secure H-1B workers at all wage levels."
- Would increase the share of H-1Bs going to Wage Levels III and IV, and reduce the share going to Wage Level I.
- Would be harder to game than Wage Levels.

Weighting by actual pay is not only more faithful to the rule's goals, but also more robust against manipulation. Employers can easily shift a job from one SOC category to another, or relocate a worksite to a cheaper region, but they cannot inflate a salary without bearing the cost. The virtue of a compensation-based rule is that it channels competition into what actually matters: higher pay for more valuable work.

The agency should consider refining a compensation approach based on actual wages paid, rather than Wage Levels, through two modest adjustments.

- A geographic adjustment, normalizing salaries using Bureau of Economic Analysis regional price parity (RPP), would prevent unfair advantages for employers in high-cost metros. An RPP-adjustment would account for the fact that nominal pay varies with local prices. Without an adjustment, using pure compensation systematically favors high-cost metros, even when a lower-cost employer is offering the stronger real package. It measures merit in real (not nominal) dollars so that H-1Bs go where workers' pay reflects true economic value and true talent of the worker, not local prices. It also protects local workers. A seemingly high wage may still undercut workers in a region with a very high cost of living. An RPP-adjusted salary accounts for this.

- An age or experience adjustment could ensure that early-career workers with high lifetime potential, such as recent STEM PhDs, are not unduly penalized. Adjusting by age would account for the full future potential and lifetime contributions of younger workers who start at lower salaries but have high growth potential. There's an enormous difference between earning more because of talent vs. earning more simply by nature of being later in one's career. It's a greater fiscal and economic benefit to the US to get a 25 year old with a $140k offer to a 64 year old with a $150k offer. A very simple implementation would take the net present value of the discounted future earnings stream, assuming a retirement age of 65 and a hypothetical lifetime earnings trajectory, as is already standard practice by many government

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explained by the fact that compensation-based prioritization has two countervailing effects: 1) students are disadvantaged relative to later career workers in same occupations but 2) they are advantaged relative to everyone in lower-paying occupations. Empirically, the latter effect dominates because international students tend to disproportionately enter higher-paying occupations, they are often paid more than other H-1B workers, even in early career stages.

agencies, including the Congressional Budget Office and the Social Security Administration (SSA).[20]

Both adjustments are technically straightforward and consistent with existing government data sources.

For comparison, I use the same methodology described in "The Wage Level Mirage" to simulate the results of what these alternatives would actually do.[21] In all cases and for all metrics, any would be lower cost alternatives to the Weighted Lottery.

1. **Status quo lottery.** This is the current system.
2. **Wage Level Weighted Lottery.** This is the scenario described in the NPRM.
3. **Compensation ranking**. This would simply award H-1Bs to those with the highest offered salaries.
4. **Compensation Weighted Lottery**. In the weighted lottery, weights are the quartiles of offered salaries. The bottom quartile gets one chance, the second quartile gets two chances, the third quartile gets three chances, and the top quartile gets four chances.
5. **Compensation Weighted Lottery, with RPP-adjustment.** Similar to the structure of the preceding alternative, but I adjust for the worksite's RPP, using the metropolitan area-specific RPP if the worksite is in a metro area, and using the RPP for the state's nonmetropolitan portion if the worksite is not in a metro area.
6. **Compensation Weighted Lottery, with RPP-adjustment and age adjustment.** Similar to the structure of the preceding alternative, but I also adjust for age using the net present value of the future earnings stream of each H-1B recipient, using a 3% discount rate, assuming workers retire at 65, and estimating the future earning stream using the scaled worker factors for each age generated by the SSA's Office of the Chief Actuary.[22]

[20] See Kyle Burkhalter and Karen Rose, "Scaled Factors for Hypothetical Earnings Examples under the 2024 Trustees Report Assumptions", Social Security Administration, Office of the Chief Actuary, Actuarial Note no. 2024.3, May 2024 and Amy Rehder Harris, John Sabelhaus, and Jonathan A. Schwabish, "Projecting Labor Force Participation and Earnings in CBO's Long-Term Microsimulation Model," Congressional Budget Office, Background Paper, Pub. no. 2795, October 2006.
[21] Neufeld, "Wage Level Mirage."
[22] Kyle Burkhalter and Karen Rose, "Scaled Factors for Hypothetical Earnings Examples under the 2024 Trustees Report Assumptions", Social Security Administration, Office of the Chief Actuary, Actuarial Note no. 2024.3, May 2024.

Average effects of alternative H-1B allocation mechanisms on FY2021-2024 registrant pools, compared to status quo

	Median salary	H-1Bs to large outsourcers	Share of H-1Bs to H-1B-dependent employers	Share of H-1Bs to F-1 students
Status quo lottery	$92k	12,300	28,500	43,000
Wage Level Weighted Lottery (NPRM)	$95k (+3%)	13,500 (+10%)	29,200 (+3%)	40,100 (-7%)
Compensation Ranking	$140k (+51%)	4,800 (-61%)	12,800 (-55%)	46,200 (+7%)
Compensation Weighted Lottery	$103k (+12%)	10,300 (-16%)	25,500 (-11%)	43,200 (+1%)
Compensation (RPP-adjusted) Weighted Lottery	$103k (+12%)	10,500 (-15%)	25,600 (-10%)	43,000 (+0%)
Compensation (RPP and age adjusted) Weighted Lottery	$100k (+8%)	9,300 (-24%)	24,300 (-15%)	48,200 (+12%)

Note: percent changes are relative to the status quo, and may appear off because of rounding.

Finally, if the agency decides to adopt a compensation-based weighted lottery, it should consider adopting more than four bins or steeper weights (i.e., 2, 4, 8, 16 rather than 1, 2, 3, 4) to better differentiate among high-salary offers and make the system more genuinely merit-based.

In sum, any compensation-based system would achieve the agency's goals far more effectively than would Wage Levels in the proposed rule. It would significantly raise *both* the skill and wage level of H-1B recipients, reduce H-1Bs to outsourcers and H-1B-dependent companies, strengthen the U.S.-educated talent pipeline, and substantially reduce the costs and perverse incentives embedded in the current proposal. There are costs and benefits between compensation-based alternatives, but all are clearly less costly than the proposed rule and would better advance its stated objectives.

VI. Recommendation #2: Release more public data on Wage Levels and wages of H-1B registrants and I-129 filers.

The final rule should instruct USCIS to publicly release microdata on H-1B registrations, as well as microdata on I-129 filings, including information on the compensation that beneficiaries were actually paid, the Wage Levels they were registered under (in any years for which this information is actually provided during registration), information on the occupation and area of employment, the age of

beneficiaries, the education of beneficiaries, and other information contained in registrations and I-129s. This data release should include registrations in the 2026 lottery for FY2027, and the I-129s filed on behalf of selected registrants. The data release should also include historical data for previous years, and be updated every year with new data.

This would allow policymakers as well as the public to better understand the effects of the status quo lottery, the effect the proposed change did or would have, and help the agency and Congress further refine H-1B selection (and other aspects of the H-1B program) to maximize the benefits to the American public. This would directly assist the agency. With reliable public data, independent researchers could replicate USCIS's own impact assessments, evaluate how well alternative weighting methods perform, and identify unanticipated distortions before they metastasize. The Department of Labor's public LCA disclosure files demonstrate that sensitive data can be released responsibly when privacy protections are applied.

Transparency is the necessary precondition for effective reform. At present, neither the public nor most policymakers can meaningfully evaluate how the H-1B selection process functions, because USCIS does not publish detailed data on registrations, Wage Levels, or the actual salaries paid to beneficiaries. Without access to these data, it is impossible to verify whether the program is rewarding higher-wage, higher-skill workers. The analysis in this comment was only possible because of data obtained through the Freedom of Information Act and would not have been possible based exclusively on USCIS's public releases. The same data disclosed by the FOIA request should be made available for all years for which USCIS has data, supplemented by an annual release.

Finally, DHS should publish a Request for Information after the data release for additional information and feedback from the public on further improvements to H-1B selection.

VII. Conclusion

The Institute for Progress shares USCIS's goal of strengthening the selectivity of the H-1B program. We agree that the program should prioritize workers whose skills and contributions most benefit the United States while protecting American workers from unfair competition. However, the proposed rule does not advance those aims.

By substituting prevailing wage levels for actual pay, the proposal is explicitly weighting a metric that is not sufficiently tied to actual merit. The result would be more visas for firms that rely on lower-wage outsourcing models and fewer for early-career scientists, engineers, and innovators educated at U.S. universities. This outcome would weaken U.S. competitiveness and undermine the country's long-term leadership in science and technology.

In short, changes to H-1B selection should be compensation-based, as in the alternatives outlined above. I have also attached my short report "The Wage Level Mirage" for more details.
I would welcome the opportunity to discuss the points I've raised here in greater

detail and provide additional information if appropriate. I thank USCIS for the opportunity to provide comments.

Sincerely,

Jeremy Neufeld

Director of High-Skilled Immigration Policy

Institute for Progress