



October 24, 2025

The Honorable Kristi Noem
Office of the Secretary
Department of Homeland Security
Washington, DC 20528

Dear Secretary Noem:

The undersigned member organizations of the Federation of Associations of Schools of the Health Professions (FASHP) write to request that you exempt the health profession education workforce as the Department prepares to issue clarifying guidance on the implementation of this Proclamation from the President's Proclamation of September 19, "Restriction on Entry of Certain Nonimmigrant Workers" ¹.

Section 1(c) of the President's proclamation grants to the Secretary of Homeland Security the determination that the hiring of H-1B visa applicants in certain specialty occupations is in the national interest and does not pose a threat to the security or welfare of the United States. If this is true of any profession, it is true of the health professions and those who educate and train those professionals.

Established in 1968, the Federation of Associations of Schools of the Health Professions (FASHP) is a collaborative network of 19 professional organizations. As the primary sources for the nation's future healthcare workforce, they each serve as the "cradle of their profession" to a combined 1.3 million students. The involved institutions form the foundation for healthcare delivery and innovation in the United States, providing the knowledge, skills and research that influence the future of our healthcare system.

Collectively, we are profoundly concerned about the harmful effect that a requirement of a \$100,000 fee to accompany each new H-1B visa application for health care professionals will have on access to patient care and our schools and programs. The availability of highly trained and experienced faculty to continue to impart rigorous health education to our students – the future health profession workforce – will determine in part how the US will be able to care for all Americans, especially those in rural and underserved areas who are most in need of care and who are very often served by H-1B visa holders.

A robust health profession education workforce working collaboratively to ensure Americans have access to needed care, and the care is timely, safe, and effective requires reasonable student to faculty ratios. In fiscal year 2024, only 6% (8,492 of 141,205) of the H-1B visas applications and 3% of renewal applications were for health

¹ A Presidential Proclamation, [Restriction on Entry of Certain Nonimmigrant Workers](#), Sept. 19, 2025.

professionals.² The academic health profession shortages also continue to grow, for instance between Academic Year (AY) 2018-2019 and AY 2020-2021 dental schools reported an 72% growth in vacant faculty positions to a total of 617.

The health care workforce shortages are well documented. The Bureau of Labor Statistics' Occupational Outlook Handbook reports that employment in health professions is projected to grow much faster than the average.³ The Health Resources and Services Administration reports that 89 million live in areas without access to adequate primary care, 132 million live in areas without access to adequate mental health care, and 62 million Americans live in areas without adequate access to oral health care.⁴ At least 15,200 primary care practitioners, 10,400 dental health practitioners, and 6,500 mental health practitioners are needed to address these shortages and ensure access to care for these communities.

We share the Administration's concern about the toll chronic disease takes annually on America's children and adults. The healthcare workforce, including the international students educated and trained by the schools and programs represented by FASHP, are a part of the solution to efforts that ensure that the American people have the access, quality, and affordability to needed care.

International health faculty and clinicians do not supplant U.S. professionals but rather augment the numbers providing education, training, and clinical care to patients. Qualified foreign-trained professionals are essential to reducing the number of Americans living in health profession shortage areas. Health professional shortages reduce access to care, which leads to a less healthy America including less effective management of chronic disease.

Thank you for your consideration. Please contact aacomgr@aacom.org with questions or to request additional information.

Sincerely,

American Association of Colleges of Nursing
American Association of Colleges of Osteopathic Medicine
American Association of Colleges of Pharmacy
American Association of Colleges of Podiatric Medicine
American Association of Veterinary Medical College
American Dental Education Association
American Occupational Therapy Association
American Physical Therapy Association
American Psychological Association

² U.S. Citizenship and Immigration Services, [Characteristics of H-1B Specialty Occupation Workers](#), April 29, 2025.

³ U.S. Bureau of Labor Statistics, [Healthcare Occupations](#), Aug. 28, 2025.

⁴ Health Resources and Services Administration, [Health Workforce Shortage Areas Dashboard](#), Oct. 19, 2025.

Association of Accredited Naturopathic Medical Colleges
Association of American Medical Colleges
Association of Schools and Colleges of Optometry
Association of Schools and Programs of Public Health
Association of University Programs in Health Administration
Council on Social Work Education
PA Education Association