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The mission of ADEA is to develop  
an inclusive, future-ready oral health  
workforce prepared to improve the health  
of all people and communities through  
leadership, education and collaboration.

655 K Street, NW, Suite 800  
Washington, DC 20001  
Phone: 202.289.7201  
Fax: 202.289.7204  
adea.org

September 29, 2025

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

Dear Secretary Noem:

I am writing on behalf of all 77 U.S. dental schools and the allied advanced dental education programs and our more than 15,000 members. On Sept. 19, the President issued a Proclamation entitled, "Restriction on Entry of Certain Nonimmigrant Workers," in which a \$100,000 payment must accompany a petition for a H1-B specialty occupation worker. Section 1(c) of the Proclamation states, in your discretion as Secretary of Homeland Security, "that the hiring of such aliens to be employed as H-1B specialty occupation workers is in the national interest..."

Media reports, attributed to White House Assistant Press Secretary Taylor Rogers, confirmed the possibility of exemptions for health care workers. This is certainly a concern in all health professions, as it would directly affect the care of people living in Health Profession Shortage Areas (HPSAs), many of whom are in rural and other underserved areas. The Department of Health and Human Services (HHS) finds that there are more than 7,200 dental HPSAs in the United States where 62 million Americans live. HHS states that it would require more than 10,500 additional oral health professionals to fill these gaps in access to care.

I am writing to clarify that in making the determination to exempt health care workers that you would use the definition of "physician" included in the Social Security Act (42 U.S. Code § 1395x) that states in the relevant part:

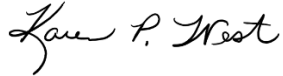
"(r) PHYSICIAN—The term "physician", when used in connection with the performance of any function or action, means...(2) a doctor of dental surgery or of dental medicine who is legally authorized to practice dentistry by the State in which he performs such function and who is acting within the scope of his license when he performs such functions..."

Thank you for your attention, and I look forward to being able to assure all our dental school deans and faculty that they will be able

to continue to provide the highest quality dental care in the world with the most highly skilled doctors in the profession.

If you would like additional information, please contact me directly or Mr. Tim Leeth, ADEA Chief Advocacy Officer, at [leeth@adea.org](mailto:leeth@adea.org) or by phone at 202-236-5354.

Sincerely,

A handwritten signature in black ink that reads "Karen P. West". The signature is fluid and cursive, with the first name "Karen" being more prominent than the last name "West".

Karen P. West, D.M.D., M.P.H.  
President and CEO

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*About ADEA: The American Dental Education Association (ADEA) is The Voice of Dental Education. Our mission is to lead and support the health professions community in preparing future-ready oral health professionals. Our members include all 87 U.S. and Canadian dental schools, more than 800 allied and advanced dental education programs, more than 55 corporations and approximately 15,000 individuals.*

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