November 9, 2026

Student and Exchange Visitor Program
Attn: STEM CIP Code Nomination
U.S. Citizenship and Immigration Services
Department of Homeland Security
500 12th St., SW
Washington, D.C. 20598

RE: STEM Designation Request for Dentistry Degrees

To Whom It May Concern:

On behalf of the undersigned organizations representing dentists, dental students and dental educators, we are writing to request that dentistry degrees (CIP code 51.0401) be eligible for STEM visas. This designation would allow international dental graduates on F-1 visas to qualify for a 24-month Optional Practical Training (OPT) extension, providing up to three years of post-graduation work authorization before requiring H-1B sponsorship. This extension would meaningfully and practically improve the dentist workforce in alignment with the national interest in oral and overall health, especially that of people in rural and remote communities.

Under current federal immigration rules, most international dental graduates on student visas are limited to 12 months of OPT after completing their degree. Many dental students experience significant challenges to this pathway, including restricted job opportunities, limited practice options to increase access to care and little time to complete required paperwork and new job requirements within 12 months. Dental students, recent graduates and employers find 12 months to be insufficient for navigating filing requirements and administrative needs for both employment and visa sponsorship. Making dentistry degrees eligible for STEM status will address these challenges while staying true to the visa's core purpose: meeting the demand for a technically skilled workforce.

Dentistry Is a STEM Field
Dentistry is by any measure a STEM discipline. Dental education requires a rigorous foundation in the biological and physical sciences, heavily relying on advanced technologies such as 3D imaging and computer-aided design and manufacturing (CAD/CAM) systems. Additionally, the practice of dentistry inherently applies engineering principles in materials science, biomechanics and prosthodontics while demanding mathematical precision in pharmacology and complex treatment planning. Giving dental degrees STEM visa status will accurately reflect the multidisciplinary, evidence-based nature of the profession. Furthermore, 13 of the health-related CIP codes in the 51 series are already eligible for the STEM visa, including medical scientists and pharmaceutical sciences.

Need for Authorization and Filing Time
If dentistry were designated as a STEM field, graduates could qualify for a 24-month OPT extension, allowing up to three years of work authorization before needing an H-1B visa. This additional time will increase the ability for dental employers to evaluate

candidates, credential new hires and navigate sponsorship logistics. The financial and administrative requirements of a one year turnaround may deter many dental practices from sponsoring international graduates even when the workforce is needed. Federally Qualified Health Centers (FQHCs), which serve the higher needs of our communities and are often the primary source of dental care in rural and remote areas, frequently undertake this arduous process. The current 12-month time constraint pushes graduates away from the community with the greatest need toward the employer who completes the paperwork under the deadline.

Policy Request in Alignment with National Interest

DHS has established that certain categories of workers may qualify for alternative visa requirements when their presence serves the national interest. Workforce shortages in critical sectors in rural and underserved communities are a matter of national concern, warranting reevaluation of recruitment options. Dentistry is a profession that falls within this principle, as oral health is inseparable from overall health and the consequences of untreated dental disease carry significant public health costs and increase emergency room visits. As DHS has discretion over what designates a STEM field. Dentistry would clearly fall within DHS's definition of a STEM field. Extending STEM OPT eligibility to dental graduates would apply the same national interest principle endorsed by DHS and acknowledge that keeping qualified providers in communities with the most need is a policy priority.

International dental graduates need additional time to complete the extensive employment onboarding common for licensed healthcare providers. However, these dentists are trained in technical scientific skills and can provide care to the nation's most remote and underserved communities. For these reasons, we strongly urge the USCIS to update the STEM designated degrees to include dentistry.

Sincerely,

California Dental Association

Minnesota Dental Association

American Dental Association

American Student Dental Association

American Dental Education Association

National Network for Oral Health Access

American Public Health Association