

October 8, 2025

Joseph B. Edlow
Director, U.S. Citizenship and Immigration Services
Camp Springs, MD 20588

Dear Director Edlow:

On behalf of the undersigned dental organizations, we write seeking clarity regarding the recent proclamation of September 19th, *Restriction on Entry of Certain Nonimmigrant Workers*, as well as the guidance provided on September 20th, on an additional fee of \$100,000 for the issuance of an H-1B visa.

According to the ADA's Health Policy Institute¹, approximately 13% of dental faculty in the United States obtained their degree outside the country. Further, the American Dental Education Association's (ADEA) most recent survey² indicates that 6% of faculty were non-resident aliens. It should be noted that these numbers are only reflective of those who chose to self-identify, and that nearly one-quarter of faculty members chose not to identify race, ethnicity, or legal status information, meaning that this 6% number is likely higher. However, this also demonstrates that a significant number of those who come to the U.S. with an international dental degree ultimately become U.S. citizens, or legal permanent residents.

Dental education and research face persistent faculty shortages nationwide, documented by both ADA and ADEA surveys. While many dentists pursue careers in private practice, U.S. dental schools depend on retired dentists and internationally trained professionals to meet their teaching obligations. These faculty members are not a substitute for U.S. workers; rather, they serve in roles that cannot be outsourced, providing in-person clinical instruction to American students. Without them, dental schools cannot maintain Commission on Dental Accreditation (CODA) standards or graduate the number of dentists required to meet public demand. Underscoring the difficulty that dental schools have in obtaining the necessary faculty, thirty-seven states³ permit a dentist educated outside the US to obtain a temporary permit to teach at an accredited dental school, while pursuing the rigorous standards required for full licensure.

Qualified foreign trained dentists may apply for advanced standing programs⁴ at Commission on Dental Accreditation (CODA) accredited schools. which require two to three additional

¹ [https://jada.ada.org/article/S0002-8177\(17\)30453-1/abstract](https://jada.ada.org/article/S0002-8177(17)30453-1/abstract)

² [ADEA US Dental School Faculty Positions Report, 2023](#)

³ [Comparison of State Statutes and Regulations That Address Minimum Requirements for Obtaining a Dental Faculty License](#)

⁴ [Foreign Educated Dentists, American Dental Education Association](#)

Joseph B. Edlow
October 8, 2025
Page 2

years of U.S. training. Far from being a workaround, this system ensures that highly skilled individuals complete training that aligns with American standards, producing better trained dentists and safer patient care. Importantly, these positions cannot be outsourced, clinical education must occur in person. Further still, those who complete these advanced standing programs disproportionately work in Federally Qualified Health Centers and other public health settings, treating a patient population which would otherwise have no access to care and would often end up in emergency rooms, where the comprehensive care they need is unavailable. This places additional strain on our healthcare infrastructure, and on taxpayers.

Far from displacing American workers, these faculty members train them. Internationally educated dentists who serve as faculty often become U.S. citizens or permanent residents, contributing long-term to the profession and to American society. Given these circumstances, and the vital contribution that these individuals make in educating the next generation of American dentists, we urge USCIS to recognize the essential role of these faculty and to explore mechanisms, such as clarification, exemption, or alternative approaches, that would avoid exacerbating the dental faculty shortage.

To facilitate further discussion, please contact David Linn from the American Dental Association at linnd@ada.org.

Sincerely,

American Dental Association
Academy of General Dentistry
American Academy of Oral & Maxillofacial Pathology
American Academy of Periodontology
American Association for Dental, Oral, and Craniofacial Research
American Association of Endodontists
American Association of Orthodontists
American Dental Education Association
American Society of Dentist Anesthesiologists
American Student Dental Association
Hispanic Dental Association
American Academy of Pediatric Dentistry