



October 23, 2025

The Honorable Kristi Noem
Secretary
U.S. Department of Homeland Security
2707 Martin L. King Avenue, SE
Washington, DC 20528

Dear Secretary Noem:

On behalf of the American Association of Oral and Maxillofacial Surgeons (AAOMS), which represents more than 9,000 oral and maxillofacial surgeons (OMSs) in the United States, we write to urge you to issue clarifying guidance recognizing the entry into the U.S. of H-1B visa dentists and residents – including OMS faculty and OMS residents – as being in the interest of the country, thereby exempting them from the proclamation entitled, “Restriction on Entry of Certain Nonimmigrant Workers” and the required \$100,000 H-1B visa issuance fee.

OMSs are surgically and medically trained dental specialists who treat conditions, defects, injuries and esthetic aspects of the mouth, teeth, jaws, neck and face. After earning a dental degree from an accredited dental school, OMSs complete a minimum of four years of hospital-based oral and maxillofacial surgery residency training, which includes rotations in such areas as general surgery, anesthesia, and clinical research. As such, the education and training required to become an OMS is very unique.

Currently, there are 102 residency programs in the United States.¹ These programs provide a wide range of patient and clinical care, including the emergency treatment of severe dental infections, facial trauma, and the treatment of congenital craniofacial anomalies, often serving underserved populations and our military forces. While not all OMS residency programs have faculty and/or residents with H-1B visa status, those that do benefit greatly from the contributions of these professionals. More specifically, foreign-trained OMS faculty play an essential role in filling that gap that would otherwise exist in ensuring that our nation’s OMS residency programs have sufficient faculty to maintain Commission on Dental Accreditation standards and are able to graduate enough OMSs to meet public demand. Meanwhile, foreign-trained dental students who match into OMS residency programs represent some of the most dedicated and highly qualified individuals in the dental field, often helping to raise the

¹OMS Residency Training Programs 2025-26. American Association of Oral and Maxillofacial Surgeons.
https://aaoms.org/wp-content/uploads/2025/06/Accredited_Advanced_Training_Programs_in_Oral_and_Maxillofacial_Surgery.pdf.
Accessed Oct. 10, 2025.

academic and clinical standards of a program. The current board certification requirements necessitate that these individuals be trained to equivalency in an accredited OMS program.²

The justification outlined in the proclamation for these policy changes suggests that the new fee is intended to address scenarios where companies exploit the H1-B program by replacing, rather than supplementing, American workers with lower-paid, lower-skilled labor. While this justification might apply to certain sectors of the economy, it does not represent the dynamics of the OMS workforce. Foreign-trained OMS faculty and residents are not supplanting their U.S.-trained counterparts with lower-skilled workers. It is quite the opposite. Foreign-trained faculty are addressing critical workforce gaps, and foreign-trained residents – who are paid the same stipend as their U.S.-trained peers – are strengthening the quality of care delivered to patients across the country.

In addition, the new \$100,000 application fee is required to be paid by the employer. Because the overwhelming majority of residency programs operate out of hospitals, dental or medical schools, it is very unlikely that these facilities would have the resources available to cover this fee. In fact, these facilities already rely on supplemental federal funding through the Graduate Medical Education program to support existing residency training programs. The likely result of increased fees for these residency programs will be a reduction in the healthcare workforce. As such, we urge the administration to categorically waive the new application fee for foreign-trained dentists, including OMS faculty and residents.

Please contact Jeanne Tuerk, AAOMS Director of Government Affairs with any questions at 800-822-6637, ext. 4321 or jtuerk@aaoms.org.

Sincerely,

A handwritten signature in black ink that reads "Robert S. Clark, DMD". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert S. Clark, DMD
AAOMS President

² Here's How International OMS Can Get Board-Certified. American Board of Oral and Maxillofacial Surgery. <https://www.aboms.org/news/heres-how-international-oms-can-get-board-certified>. Accessed Oct. 15, 2025.