

May 11, 2020

Mr. Joseph B. Edlow
Deputy Director for Policy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue, NW
Washington, DC 20529

Dear Deputy Director Edlow:

On behalf of the American Dental Association (ADA), we are writing to respectfully request that you consider extending the 60 day grace period for dentists who are H-1B visa holders.

During the COVID-19 pandemic, many dental offices are closed or are only seeing emergency patients. They are doing so in order to slow community spread, preserve medical supplies, and relieve emergency departments (EDs) from seeing dental patients.

As a result, dentists are being furloughed or laid off through no fault of their own. Those dentists who are in the United States on H-1B visas are worried that they may lose their status and be forced to go back to their home country. This will prevent them from returning to the important work of improving the oral health of Americans when dental offices reopen.

We ask that you please extend the grace period to 180 days. Thank you for your consideration of this important issue. Should you have any questions, please do not hesitate to contact Ms. Roxanne Yaghoubi at (202) 415-0187 and yaghoubir@ada.org.

Sincerely,



Chad P. Gehani, D.D.S.
President



Kathleen T. O'Loughlin, D.M.D., M.P.H.
Executive Director

CPG:KTO:ry



**U.S. Citizenship
and Immigration
Services**

July 1, 2020

Dr. Chad P. Gehani, D.D.S.
President
American Dental Association
1111 14th Street, NW
Suite 1200
Washington, DC 20005

Dear Dr. Gehani:

Thank you for your May 11, 2020 letter. In the letter, you request consideration for an extension of up to 180-day grace period for dentists with H-1B classification. The Acting Secretary has asked that I respond on his behalf.

The Department of Homeland Security has no greater responsibility than ensuring the safety and security of our country. Responding to the pandemic requires everyone to work within rapidly changing, complex circumstances that create a variety of situations and conditions unique to individuals and communities.

We recognize that there are immigration-related challenges that individuals, employers, and others face as a direct result of the national emergency and will consider your suggestion regarding grace periods. As a result of the COVID-19 pandemic, some employers are seeing a shift in their business practices and are seeking additional flexibilities for their alien workers. We must carefully analyze these issues and leverage our resources to effectively address these challenges within our existing statutory and regulatory authorities.

We recommend employers review the applicable laws and guidance to determine their obligations.¹ In addition, employers may view updates on related policies and information about special situations due to the COVID-19 pandemic at uscis.gov/coronavirus (U.S. Citizenship and Immigration Services) and dol.gov/coronavirus (Department of Labor).

Thank you again for your letter. We appreciate your interest in this important matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joe Edlow", with a long horizontal flourish extending to the right.

Joseph Edlow
Deputy Director for Policy

¹ We note that whether there has been a material change in H-1B employment and how to address an alien's nonproductive status are fact specific assessments.