



September 29, 2025

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

Re: Restriction on Entry of Certain Nonimmigrant Workers

Dear Secretary Noem:

On behalf of the more than 37 million Americans living with kidney diseases and the 22,000 nephrologists, scientists, and other kidney health care professionals represented by the American Society of Nephrology (ASN), ASN strongly urges you to provide an exemption to the new restrictions imposed on individuals in the H-1B program for physicians-in-training and practicing physicians who are international medical graduates (IMGs) who will care for Americans living with kidney diseases.

IMGs training in US residencies and fellowships provide care for millions of Americans and represent one in four US physicians, more than 50% of the nephrologists in the United States, and nearly two-thirds of this country's nephrology fellows. A significant portion of these IMGs are working through the H-1B program. Without these individuals, many of the 37 million Americans living with kidney diseases—including more than 800,000 individuals with kidney failure who depend on dialysis or transplantation, especially those in rural, underserved, or economically disadvantaged areas—would face serious (and in some cases insurmountable) barriers to accessing the specialized care they need to live.

ASN believes the changes to the H-1B program will disrupt care for patients, particularly for US veterans who rely on the 120,000 residents and fellows training in the Department of Veterans Affairs (VA) Medical Centers for their lifesaving care. The VA is the largest health professional training system in the United States, and many physicians who train in the VA system stay, committed to caring for US veterans. The United States is already facing a shortage of nephrologists, and this restriction will destabilize the physician pipeline, create unnecessary barriers for IMGs training in the United States, increase patient wait times for essential kidney care, and slow research.

In the *Restriction on Entry of Certain Nonimmigrant Workers* proclamation dated September 19, 2025, President Donald J. Trump ordered that entry of H-1B petitioners would be restricted unless accompanied by a \$100,000 payment. Such a payment is neither tenable nor realistic for

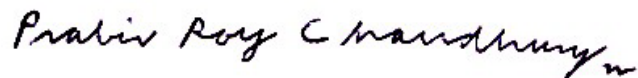
the institutions employing these physicians-in-training. The restriction will cut off the supply of these essential workers who provide critical health care to Americans daily. The proclamation primarily focused on examples of competition between American and foreign workers in the information technology sphere, rather than considering the realities of the US health care system, which operates in a very different environment. For example, in the field of nephrology, there are not enough US medical graduates (USMGs) to fill open training and practice positions nationwide. Without IMGs many of these positions would remain unfilled, leaving millions of Americans without the care they need—often to survive. Importantly, IMGs are not paid less than USMGs, so there is no financial incentive to hire them as there may be in other fields.

**Imposing this new barrier would have disastrous consequences for the health of millions of Americans who rely on IMGs for lifesaving care every day.**

Section 1 (c) of the proclamation states that this restriction shall not apply “if the Secretary of Homeland Security determines, in the Secretary’s discretion, that the hiring of such aliens to be employed as H-1B specialty occupation workers is in the national interest and does not pose a threat to the security or welfare of the United States.” In fact, this group of well-vetted physicians-in-training who are potential H-1B holders directly benefit the welfare of Americans. As such, **ASN requests that Secretary Noem provide an exemption from this proclamation for physicians-in-training and practicing physicians who are IMGs who will care for the 37 million Americans living with kidney diseases.**

Again, thank you for the opportunity to comment on this change to the H-1B program. Besides making this request, ASN offers to provide expert input and help however possible as the Department of Homeland Security works to ensure Americans continue to have access to care provided by IMGs before, on, and after October 1, 2025, when this proclamation goes into effect. To discuss this letter, ASN’s position on this issue, or the society, please contact ASN Executive Vice President Tod Ibrahim at [tibrahim@asn-online.org](mailto:tibrahim@asn-online.org).

Sincerely,

A handwritten signature in black ink that reads "Prabir Roy Chaudhury". The signature is written in a cursive, flowing style.

Prabir Roy-Chaudhury, MD, PhD, FASN  
President