

October 16, 2025

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

The Honorable Joseph Edlow
Director
U.S. Citizenship and Immigration Services
20 Massachusetts Avenue NW
Washington, DC 20529

Re: Request for Exemption of Physical Therapists, Occupational Therapists, and
Speech Language Pathologists from New \$100,000 H-1B Application Fee

Dear Secretary Noem and Director Edlow:

We, the undersigned organizations, write to urge you to exempt physical therapists, occupational therapists, and speech language pathologists from the new H-1B policy and associated fee structure under the Proclamation on “Restriction on Entry of Certain Nonimmigrant Workers” announced on September 19, 2025. Imposition of a new \$100,000 fee relating to the entry of foreign-educated therapists would impede patient access to care at a time when the supply of these professionals is already alarmingly low.

Physical therapists, occupational therapists, and speech language pathologists practice across a wide range of settings, including hospitals, nursing homes, assisted living post skilled nursing facility stay, outpatient clinics, rehabilitation centers, schools, workplaces, and patients’ homes. Access to their services can significantly reduce overall health care costs by improving outcomes, preventing complications, and lowering the need for high-cost interventions.

The United States faces a growing and well-documented shortage of physical therapists. A 2022 study of the physical therapist workforce found that there were an estimated 233,890 full-time equivalent (FTE) physical therapists in the U.S. workforce. A projected shortfall of 12,070 FTEs (5.2%) in 2022 was identified relative to population demand. By 2037, the physical therapist supply is expected to reach

273,070 FTEs, while demand will increase to 282,230 FTEs, resulting in a projected shortfall of 9120 FTEs (3.3%) in the main scenario.¹

Occupational therapists and speech-language pathologists are both experiencing notable shortages in the U.S., driven by rising demand, recent declines in the workforce and workforce constraints. For occupational therapists, the combination of an aging population, increased rates of chronic disease, and the need for rehabilitation services has pushed demand beyond supply. While graduate programs produce several thousand new occupational therapists each year, retirements and caseload growth outpace the pipeline.²

Speech language pathologists face even steeper challenges. Employment is projected to grow nearly 20% over the next decade, one of the fastest growth rates among health professions. Demand is rising from multiple directions: more children being diagnosed with autism or speech delays, improved survival of premature infants, and an aging population with stroke and dementia-related communication needs. Yet the pipeline is constrained by limited graduate program capacity, leaving many willing candidates unable to enter the field. Schools and healthcare systems regularly report vacancy rates of 10–15%, with schools in particular facing high caseloads of 50 or more children per speech language pathologist. This leads to delayed services for children and insufficient therapy for patients recovering from neurological conditions.³

The FY 2024 USCIS Congressional Report shows that 1,346 H-1B petitions were approved for therapists. While this is a relatively small number of the overall H-1B visas, these professionals are critical to the health of U.S. citizens. Limiting access to internationally trained physical therapists, occupational therapists, and speech language pathologists with the proposed \$100,000 application fee will directly reduce patient access to care, delay recovery from surgeries and injuries, and increase the burden on family caregivers. As such, we respectfully request an exemption for these vital health professionals from the new H-1B policy and associated fees.

¹ Dall, T., Zarek, E., Manal, T., & et al. (2025). Current and Projected Future Supply and Demand for Physical Therapists From 2022 to 2037: A New Approach Using Microsimulation. *Physical Therapy*, 105(3). <https://doi.org/10.1093/ptj/pzaf014>

² *Int J Environ Res Public Health*. 2022 Apr 27;19(9):5307. doi: [10.3390/ijerph19095307](https://doi.org/10.3390/ijerph19095307)

³ <https://www.asha.org/siteassets/surveys/supply-demand-slp.pdf>

Please contact Patrick Cooney at (202) 413-2629 or via email at patrick@federalgrp.com if you have questions regarding this correspondence. Thank you for your attention to this matter.

Respectfully,

ADVION (formerly National Association for the Support of Long Term Care)
Alliance for Physical Therapy Quality and Innovation
American Health Care Association/National Center for Assisted Living
American Occupational Therapy Association
American Physical Therapy Association
National Association of Rehabilitation Providers and Agencies