May 5, 2020

Mr. Kenneth T. Cuccinelli, Esq.
Acting Director
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue, NW
Washington, DC 20529

Dear Acting Director Cuccinelli,

The American Student Dental Association (ASDA) remains in strong support for ensuring the timely graduation and licensure for the Class of 2020, including International students on a student visa. We understand this is a time of uncertainty for many.

The Association believes it is imperative that students graduate in a timely manner to enter the workforce and matriculate into residency programs before they begin on July 1. International Advanced Standing/International Dentists Program students on F-1 visa face many issues in the current scenario. These issues include delays in licensure, employment, Optional Practical Training (OPT), and H-1B visa applications.

- Class of 2020 students who applied or are planning to apply for 1-year Optional Practical Training (OPT) are facing uncertainty over on-time graduation, application deadlines, and grace periods for finding employment.
- Students who have been accepted to dental residency programs and require an H-1B visa might face significant delays in starting their programs as a result of the suspension of H-1B premium processing. This might result in termination of admissions.

Given the unprecedented times, we call upon educators, policy makers and USCIS to coordinate and be flexible with deadlines that significantly affect the international students during these times.

ASDA proposes this be completed as follows:

- Extend the 90 day- OPT unemployment regulation to 180 days, post-completion grace period from 60 days to 120 days and OPT application deadline following graduation from 60 days to 120 days.
- Allow students to file OPT applications from outside the United States.
- Expedite H-1B regular processing for prospective residents in order to start residencies on time July 1.
It is important for all dental students to graduate and have a license in order to gain practical experience and serve their communities. We ask that the USCIS, International Student Services at Universities and related governing bodies work together to ensure that the Class of 2020 international dental student graduates overcome the challenges presented during this national crisis.

Sincerely,

[Signature]

American Student Dental Association President