September 26, 2025

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

Dear Secretary Noem:

The undersigned national and state pharmacy organizations strongly urge DHS to issue guidance that determines that H-1B pharmacists' entry into the U.S. is in the national interest of the country, exempting them from the <u>Proclamation</u>, "Restriction on Entry of Certain Nonimmigrant Workers."

This Proclamation implements a \$100,000 fee to be paid by the prospective employer upon initial application for an H-1B visa beginning on September 21, 2025. Section 1(c) of the Proclamation states that the restriction will not apply to an H-1B worker, or an industry, "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* [emphasis added] and does not pose a threat to the security or welfare of the United States." Accordingly, our organizations urge DHS to clarify that pharmacists—including those working in community, hospital, long-term care, and specialty settings—are critical to our national interest and exempt from the Proclamation.

In addition, Section 3(a) of the Proclamation states "[t]he restriction on entry...shall apply only to aliens who enter or attempt to enter the United States *after the effective date of this proclamation [emphasis added]...*" Hundreds of H-1B petitions were filed for pharmacists in FY2024, with top employers including major retail chains and hospital systems. Further, the Health Resources and Services Administration's (HRSA) National Center for Health Workforce Analysis (NCHWA) projects a shortage of 17,030 pharmacists by 2037.

Maintaining a robust pharmacy workforce is crucial to ensuring medication safety, effectively managing chronic diseases, and supporting public health initiatives nationwide. However, the country is facing a growing shortage of pharmacists, particularly in rural and underserved areas. According to the Pharmacy Demand Report for Q1 2025, there were over 20,000 pharmacist job postings nationwide, with the highest demand in California (1,681), Texas (1,311), Florida (1,120), Pennsylvania (1,008), and New York (888). Yet, in 2022, there were only 9,047 first-year enrollees in PharmD programs. Conversely, areas like Puerto Rico, Hawaii, Wyoming, the District of Columbia, and Alaska reported the fewest postings, highlighting persistent access challenges in these regions.

This shortage is not evenly distributed. The Southern U.S. reported the highest number of job postings, followed by the Midwest, West, and Northeast. These trends underscore the urgent need to expand the pipeline of qualified pharmacists, particularly in areas of high need. H-1B

pharmacists are essential to filling these gaps and ensuring continuity of care for millions of Americans.

H-1B pharmacists play a vital role in filling this gap. Many are employed in high-need areas, including Medically Underserved Areas and Health Professional Shortage Areas, where they provide critical services such as immunizations, medication therapy management, and chronic disease counseling. Additionally, foreign-trained pharmacists often possess multilingual skills and cultural competencies that enhance patient care in diverse communities.

The U.S. health care system relies on pharmacists from other countries to ensure safe, effective, and accessible medication use. Accordingly, we must ensure that the U.S. has a fair and efficient immigration system that supports the pharmacy workforce and protects public health. Our organizations strongly urge DHS to consider the entry of H-1B pharmacists into the U.S. as being in the national interest of the country and waive the new application fee, allowing these professionals to continue serving U.S. patients and communities who need them the most.

Thank you for your prompt attention to this matter. Please contact mbaxter@aphanet.org if DHS would like to meet with our nation's pharmacists to discuss their vital role in providing access to care, particularly in rural and underserved areas where there are often no other health care practitioners for miles.

Sincerely,

American Pharmacists Association (APhA)
American Association of Colleges of Pharmacy (AACP)
American Association of Psychiatric Pharmacists (AAPP)
American College of Clinical Pharmacy (ACCP)
The American Society of Consultant Pharmacists (ASCP)
American Society of Health-System Pharmacists (ASHP)
Academy of Managed Care Pharmacy (AMCP)
National Association of Boards of Pharmacy (NABP)
National Alliance of State Pharmacy Associations (NASPA)
National Community Pharmacists Association (NCPA)
The Society of Infectious Diseases Pharmacists (SIDP)