

September 23, 2025

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

Dear Secretary Noem:

On behalf of the American Society for Clinical Pathology (ASCP), I am writing to request that the Department of Homeland Security provide a national interest exemption for pathologists and medical laboratory professionals from the new \$100,000 H-1B fee. Pathologists and laboratory professionals are critical members of the patient care team and shortages affecting these professionals can impact access to the quality medical services needed to optimize patient care.

On September 19, President Donald Trump announced an increase in the fee for an H-1B visa. Per the President's [Executive Order](#), employers would have to pay a fee of \$100,000 to hire an individual on an H-1B visa. Section 1(C) of the Order, however, allows a national interest exemptions from the fee "if the Secretary of Homeland Security determines...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." A recent [study](#) commissioned by Siemens Healthineers found that *99 percent of physicians agree pathology and laboratory services are integral to patient care*, with 98 percent noting they had modified a diagnosis or care plan based on laboratory data. Physicians also reported that laboratory information helps streamline the use of scarce healthcare resources.

Our nation's pathologist and laboratory workforce faces a significant shortage of trained personnel. According to data from the Association of American Medical Colleges, the United States faces a projected [shortage of up to 86,000 physicians](#) by 2036, with demand for physicians currently exceeding supply. The demand for pathologists is estimated at 700-840 per year while only 600 new pathologists are entering practice each year.

Demand for non-physician [laboratory professionals](#), such as medical laboratory scientists and technicians, also exceeds supply, with the U.S. Bureau of Labor Statistics estimating the annual demand for these professionals at around [22,600 job openings per year](#). Unfortunately, we are only graduating about 7,000 individuals per year from accredited training programs, far short of projected need. Moreover, the American Society for Clinical Pathology's [2022 Vacancy Survey](#) showed increased overall vacancy rates for laboratory

positions in all departments compared with 2020, with vacancy rates in some departments as high as 18 percent. Recommendations regarding standardization of medical laboratory professional job titles was the subject of a recent [joint position paper](#) from the American Society for Clinical Pathology Board of Certification (ASCP BOC) and the American Society for Clinical Laboratory Science (ASCLS).

These shortages indicate that the United States is not training enough pathologists and laboratory professionals to meet demand. The H-1B visa is essential to addressing some of these shortages, especially in underserved areas. Without a national interest exception for pathologists and laboratory professionals, many hospital and independent clinical laboratories will face even more significant obstacles staffing their facilities. This will adversely impact patient access to the critical lifesaving laboratory data on which they and their healthcare providers depend.

Accordingly, we urge you to provide a national interest exemption for pathologists, including physicians, medical residents, fellows, and researchers, and [medical laboratory professionals](#) from the new H-1B fee.

ASCP appreciates this opportunity to provide these comments. If we can be of any assistance on this matter, please do not hesitate to contact Matthew Schulze, Senior Director of the ASCP Center for Public Policy, at matthew.schulze@ascp.org.

Sincerely,



Gregory N. Sossaman, MD, MASCP
President, ASCP

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