

# Immigration Updates: Polices & Insights

3RNET

Matthew Webster  
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**Fredrikson**

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# Agenda

- 1. International Medical Graduate Physician Immigration Overview**
- 2. Immigration Updates**
- 3. Q&A**

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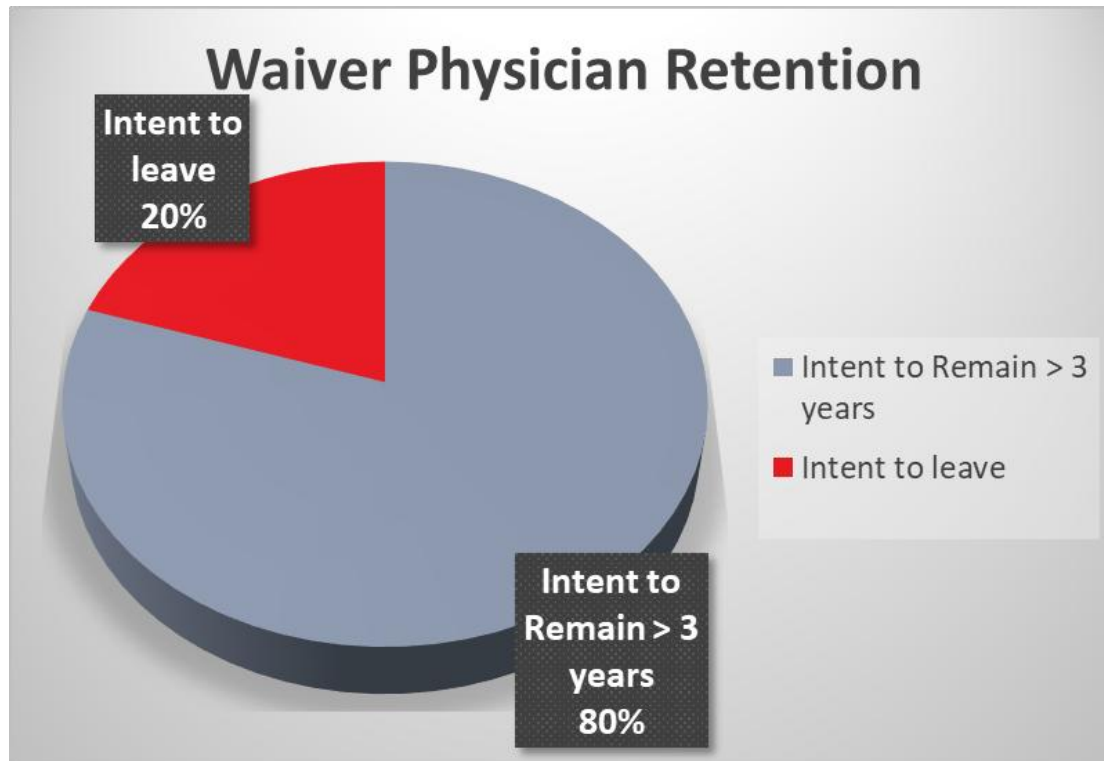
# International Medical Graduate Physician Immigration Overview

# Immigration as Recruitment Tool

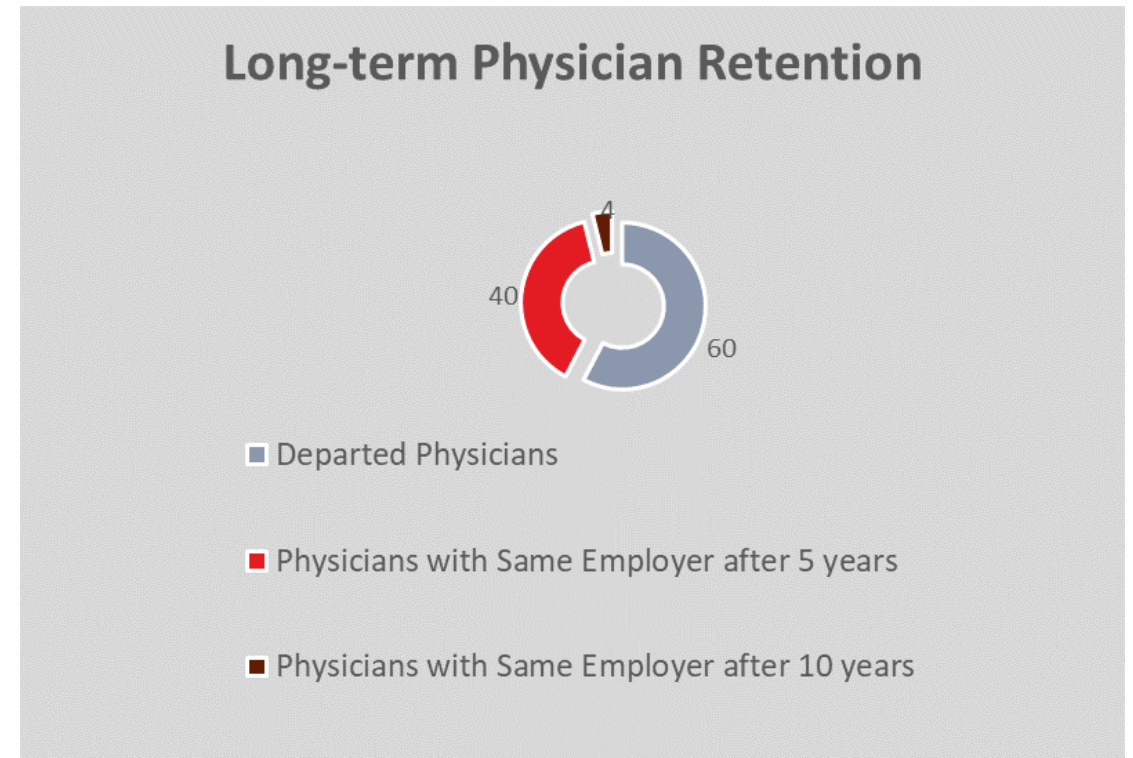
- Expand Pool of Physicians (>25% of residents/fellows are IMGs)
  - 10,000 IMG Physicians matched with clinical residency programs in March 2025; 9,682 in March 2026
- Incentives for Rural & Medically Underserved Placements (>1,000/year)
  - State Departments of Health have ability to approve up to 1,500 waivers
  - Regional Commissions approve hundreds of J-1 waivers (specific data not available)
  - HHS processed 350 Clinical Waivers in FY2022, 450 in FY2023, and more than 600 in FY2024/25 [*note recent slowdown*]
- Elevate Professional Practice
- Improve Linguistic & Cultural Matches

# Immigration as Recruitment Tool

## Retention >3 years



## Long-term Retention



# J-1 Exchange Visitor Program: A Brief Primer



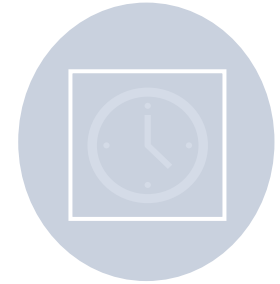
DEFINITION: J-  
1 EXCHANGE  
VISITOR



WHY  
PHYSICIANS?



ECFMG &  
DEPARTMENT  
OF STATE



TIME &  
ACTIVITY  
LIMITATIONS

# 2-Year Home Residence Obligation



- Blanket coverage to ALL J-1 clinical trainees
- Requires residence and physical presence in HOME COUNTRY
- Implications:
  - Ineligibility for an H-1B visa
  - Ineligibility for permanent residence
- Conversely: does not disqualify eligibility for other nonimmigrant visas (O-1, TN, etc.)

# Options for J-1 Physician on Completing GME?

- #1 Return home for two years
- #2 Obtain a waiver of two-year home residence obligation
- #3 Qualify for alternative visa status other than H-1B





# Bases for Physician J-1 Waivers

- Interested Government Agency (IGA) sponsorship
  - Conrad State 30 Program/State Department of Health
  - Regional Commissions (DRA, ARC, SCRC, NBRC)
  - Department of Health and Human Services (HHS)
- Exceptional hardship to USC/LPR relative
- Persecution

*\*Release/no-objection statement from home country unavailable for IMGs\**

*\*\*Can only receive ONE waiver – first waiver approved controls\*\**

# What are the Federal Requirements for IGA Waivers?

Conrad Program Only - Limit of 30 waivers/fiscal year

- Medically underserved placements: up to 30
- FLEX waivers: 10

Full-time employment/ 40 hours clinical care in HPSA/MUA/MUP worksite

Need to agree to work in position within 90 days of waiver issuance

3-year H-1B employment obligation

# Conrad State 30 Waiver Program: Basics



- Allows state DOH to recommend up to 30 physicians/ year who will serve the public interest
- Public policy focus: expanding the safety net
- Federal-State partnership
  - Federal: creates basic structure
  - State:
    - *Fill in the blanks*
    - *Administer the program to meet needs of State*
    - *NOTE: Unless codified or subject to state regulations, state DOH has wide latitude to craft Conrad 30 program to meet **patient needs & maximize waiver usage***

# State Conrad Waiver Nuances that Matter

 Special Application Periods (“First in, First out,” 60-day filing period, phased filings, etc.)

 Primary Care vs. Specialty Care

 Primary Care: Definition & Scope

 Historical Usage Numbers & Competitiveness

 Limitations on Underserved Designations

 FLEX Policy & Competitiveness

 Non-Compete & Other Contract Language Requirements

 Departure Policies & Reporting Requirements

 Limitation on # of waivers per employer

 Additional forms/affidavits?

 Timing of program application/consideration/decision periods

# Historical Waiver Usage (FY25)

- In FY22, **23/50 states** filled all 30 Conrad slots.
- Only **13%** of Conrad 30 waiver slots were filled by Primary Care Physicians
- **82%** of Conrad 30 slots were for Specialists
- **72%** of Conrad 30 slots were for non-rural placements
- Only **17%** were FLEX spots (non-HPSA/MUA)

| FFY 2025 10/24 to 9/25 |                      |       |            |       |           |       |         |              |
|------------------------|----------------------|-------|------------|-------|-----------|-------|---------|--------------|
| State                  | Primary Care         | Psych | Specialist | Rural | Non-Rural | Split | Flex 10 | FFY 25 Total |
| Alabama                | 2                    | 0     | 25         | 0     | 27        | 0     | 0       | 27           |
| Alaska                 | 0                    | 0     | 2          | 0     | 0         | 2     | 0       | 2            |
| Arizona                | 6                    | 0     | 24         | 9     | 21        | 0     | 0       | 30           |
| Arkansas               | 13                   | 0     | 17         | 3     | 26        | 1     | 0       | 30           |
| California             | Total Only Available |       |            |       |           |       |         |              |
| Colorado               | 0                    | 0     | 18         | 0     | 18        | 0     | 5       | 18           |
| Connecticut            | 3                    | 2     | 25         | 0     | 30        | 0     | 3       | 30           |
| Delaware               | 1                    | 2     | 17         | 6     | 14        | 0     | 0       | 20           |
| Dist. Of Col           | 8                    | 0     | 6          | 0     | 14        | 0     | 0       | 14           |
| Florida                | No Data Available    |       |            |       |           |       |         |              |
| Georgia                | No Data Available    |       |            |       |           |       |         |              |
| Hawaii                 | 1                    | 0     | 8          | 2     | 7         | 0     | 7       | 9            |
| Idaho                  | 0                    | 0     | 3          | 3     | 0         | 0     | 0       | 3            |
| Illinois               | 4                    | 2     | 24         | 3     | 27        | 0     | 2       | 30           |
| Indiana                | 6                    | 1     | 23         | 1     | 22        | 7     | 0       | 30           |
| Iowa                   | 1                    | 0     | 28         | 1     | 28        | 0     | 0       | 29           |
| Kansas                 | 1                    | 0     | 14         | 0     | 15        | 0     | 2       | 15           |
| Kentucky               | 4                    | 1     | 25         | 16    | 14        | 0     | 5       | 30           |
| Louisiana              | 2                    | 0     | 28         | 22    | 2         | 6     | 8       | 30           |
| Maine                  | 1                    | 0     | 29         | 20    | 10        | 0     | 10      | 30           |
| Maryland               | 3                    | 1     | 25         | 14    | 13        | 2     | 5       | 29           |
| Massachusetts          | 5                    | 1     | 25         | 2     | 29        | 0     | 5       | 31           |
| Michigan               | 2                    | 4     | 24         | 3     | 25        | 2     | 0       | 30           |
| Minnesota              | 2                    | 0     | 28         | 5     | 25        | 0     | 2       | 30           |
| Mississippi            | 2                    | 0     | 2          | 0     | 4         | 0     | 0       | 4            |
| Missouri               | 0                    | 0     | 30         | 0     | 30        | 0     | 0       | 30           |
| Montana                | 2                    | 1     | 7          | 2     | 8         | 0     | 8       | 10           |
| Nebraska               | 5                    | 0     | 18         | 6     | 17        | 0     | 10      | 23           |
| Nevada                 | 1                    | 1     | 20         | 0     | 17        | 5     | 2       | 22           |
| New Hampshire          | 8                    | 0     | 17         | 10    | 15        | 0     | 10      | 25           |
| New Jersey             | 2                    | 1     | 27         | 0     | 30        | 0     | 9       | 30           |
| New Mexico             | 4                    | 0     | 26         | 5     | 25        | 0     | 0       | 30           |
| New York               | 0                    | 1     | 29         | 3     | 27        | 0     | 4       | 30           |
| North Carolina         | 9                    | 1     | 20         | 20    | 10        | 0     | 10      | 30           |
| North Dakota           | 0                    | 0     | 10         | 0     | 10        | 0     | 10      | 10           |
| Ohio                   | 0                    | 0     | 30         | 4     | 26        | 0     | 1       | 30           |
| Oklahoma               | 0                    | 1     | 29         | 3     | 27        | 0     | 10      | 30           |
| Oregon                 | 10                   | 0     | 20         | 3     | 26        | 1     | 4       | 30           |
| Pennsylvania           | 6                    | 0     | 24         | 12    | 18        | 0     | 3       | 30           |
| Puerto Rico            | 0                    | 0     | 1          | 0     | 1         | 0     | 1       | 1            |
| Rhode Island           | 6                    | 3     | 20         | 0     | 29        | 0     | 10      | 29           |
| South Carolina         | 4                    | 0     | 23         | 5     | 21        | 1     | 5       | 27           |
| South Dakota           | 0                    | 0     | 24         | 14    | 10        | 0     | 10      | 24           |
| Tennessee              | 0                    | 2     | 25         | 11    | 16        | 0     | 0       | 27           |
| Texas                  | 1                    | 3     | 26         | 3     | 27        | 0     | 0       | 30           |
| Utah                   | 1                    | 0     | 14         | 1     | 14        | 0     | 10      | 15           |
| Vermont                | No Data Available    |       |            |       |           |       |         |              |
| Virginia               | No Data Available    |       |            |       |           |       |         |              |
| Washington             | 3                    | 1     | 24         | 2     | 26        | 0     | 3       | 28           |
| West Virginia          | 1                    | 0     | 27         | 25    | 3         | 0     | 3       | 28           |
| Wisconsin              | 15                   | 0     | 15         | 20    | 10        | 0     | 10      | 30           |
| Wyoming                | 0                    | 0     | 2          | 2     | 0         | 0     | 0       | 2            |
| Totals                 | 145                  | 29    | 928        | 261   | 814       | 27    | 187     | 1,132        |
| Filled all slots       |                      |       |            |       |           |       |         | 23           |

<https://www.3rnet.org/j1-filled>

Historical  
Waiver Usage  
(2001-2025)

- Overall Conrad 30 usage peaked in **FY20 at 1,182** but has remained **above 1,000** waivers since **FY18**
- Since FY18, about **half of states** have filled all 30 slots

<https://www.3rnet.org/j1-filled>

| Conrad 30 State Totals from FY 2001 through FY 2025 |                |                |                |                       |                       |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |
|-----------------------------------------------------|----------------|----------------|----------------|-----------------------|-----------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| State                                               | FY 01<br>Total | FY 02<br>Total | FY 03<br>Total | FY 04<br>GAO<br>Total | FY 05<br>GAO<br>Total | FY 06<br>Total | FY 07<br>Total | FY 08<br>Total | FY 09<br>Total | FY 10<br>Total | FY 11<br>Total | FY 12<br>Total | FY 13<br>Total | FY 14<br>Total | FY 15<br>Total | FY 16<br>Total | FY 17<br>Total | FY 18<br>Total | FY 19<br>Total | FY 20<br>Total | FY 21<br>Total | FY 22<br>Total | FY 23<br>Total | FY 24<br>Total | FY 25<br>Total |
| Alabama                                             | 4              | 6              | 18             | 19                    | 24                    | 15             | 12             | 15             | 13             | 10             | 23             | 28             | 20             | 20             | 13             | 22             | 16             | 18             | 17             | 26             | 27             | 25             | 26             | 29             | 27             |
| Alaska                                              | 1              | 1              | 5              | 0                     | 1                     | 3              | No Data        | No Data        | No Data        | 2              | 1              | 0              | 1              | 0              | 3              | 0              | 2              | 0              | 6              | 0              | 2              | 1              | 5              | 0              | 2              |
| Arizona                                             | 19             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 18             | 25             | 30             | 30             | 30             | 30             | 24             | 25             | 29             | 27             | 30             | 30             | 30             | 26             | 30             | 30             |
| Arkansas                                            | 0              | 30             | 30             | 30                    | 29                    | 14             | No Data        | 18             | No Data        | No Data        | 14             | 14             | 28             | 25             | 21             | 30             |                | 17             | 27             | 29             | 30             | 30             | 24             | 30             | 30             |
| California                                          | 0              | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 27             | 30             | 30             | 30             | 30             | No Data        | 30             | 30             | 23             | 28             | No Data        | 29             | 30             |
| Colorado                                            | 0              | 0              | 11             | 3                     | 5                     | 9              | 9              | 7              | 13             | 5              | 13             | 13             | 11             | 14             | 7              | 9              | 7              | 14             | 12             | 16             | 11             | 10             | 11             | 18             | 18             |
| Connecticut                                         | 20             | 20             | 27             | 30                    | 26                    | 21             | 20             | No Data        | 22             | 29             | 21             | 30             | 30             | 30             | 30             | No Data        | No Data        | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Delaware                                            | 18             | 25             | 21             | 21                    | 16                    | 12             | 14             | 14             | 12             | 14             | 13             | 10             | 15             | 15             | 12             | 13             | 20             | 16             | 16             | 24             | 29             | 27             | No Data        | 20             |                |
| Dist. Of Col                                        | 9              | 7              | 3              | 9                     | 3                     | 2              | 2              | 4              | 5              | 3              | 5              | 8              | 4              | 3              | 9              | 14             | 14             | 15             | 8              | 8              | 11             | 9              | 15             | 10             | 14             |
| Florida                                             | 17             | 25             | 30             | 30                    | 30                    | 29             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        | No Data        | 30             | 30             | 30             | 30             | 29             | 30             | No Data        | No Data        |
| Georgia                                             | 20             | 20             | 30             | 30                    | 28                    | 18             | 8              | 7              | 12             | 19             | 23             | 18             | 30             | 30             | 21             | 28             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        |                |
| Hawaii                                              | 0              | 0              | 2              | 1                     | 4                     | 4              | 3              | 6              | 1              | 0              | 3              | 4              | 5              | 4              | 11             | 11             | 7              | 5              | 5              | 11             | 4              | 13             | 12             | 14             | 9              |
| Idaho                                               | 0              | 0              | 0              | 0                     | 1                     | 1              | 0              | 1              | 1              | 0              | 5              | 0              | 1              | 2              | 2              | 0              | 0              | 4              | 4              | 1              | 1              | 5              | 6              | 1              | 3              |
| Illinois                                            | 20             | 22             | 28             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        | 30             |                |
| Indiana                                             | 18             | 28             | 27             | 30                    | 30                    | 29             | 14             | 18             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Iowa                                                | 20             | 30             | 30             | 30                    | 28                    | 29             | 30             | 30             | 29             | 25             | 30             | 30             | 30             | 30             | 28             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 29             | 29             |
| Kansas                                              | 0              | 4              | 14             | 26                    | 17                    | 17             | 14             | 16             | 13             | 16             | 22             | 23             | 28             | 24             | 25             | 30             | 25             | 30             | 30             | 30             | 29             | 18             | 21             | 30             | 15             |
| Kentucky                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Louisiana                                           | 0              | 15             | 15             | 13                    | 10                    | 15             | 22             | 22             | 15             | 25             | 19             | 18             | 20             | 12             | 17             | 12             | 6              | 12             | 12             | 15             | 22             | 30             | 30             | 30             | 30             |
| Maine                                               | 12             | 20             | 29             | 18                    | 25                    | 18             | 25             | 23             | 9              | 25             | 27             | 22             | 30             | 27             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        | 29             | 30             | 30             | 30             |
| Maryland                                            | 6              | 9              | 15             | 22                    | 29                    | 24             | 16             | 18             | 21             | 18             | 30             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 28             | 27             | 29             |
| Massachusetts                                       | 20             | 30             | 28             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 29             | 25             | 30             | 29             | 30             | 0              | 30             | 29             | 30             | 30             | 26             | 26             | 30             | 31             |
| Michigan                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Minnesota                                           | 14             | 23             | 30             | 15                    | 21                    | 17             | 21             | 23             | 15             | 21             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Mississippi                                         | 14             | 13             | 19             | 17                    | 18                    | 8              | 9              | 7              | 3              | 7              | 3              | 8              | 7              | 5              | 6              | 5              | 2              | 4              | 6              | 6              | 10             | 10             | 8              | 5              | 4              |
| Missouri                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Montana                                             | 1              | 2              | 2              | 1                     | 0                     | 0              | 3              | 6              | 2              | 1              | 2              | 2              | 4              | 2              | 7              | 10             | 6              | 6              | 10             | 10             | 12             | No Data        | No Data        | 11             | 10             |
| Nebraska                                            | 13             | 17             | 15             | 7                     | 13                    | 13             | 10             | 14             | 9              | 11             | 12             | 13             | 21             | 14             | 15             | 13             | 15             | 18             | 19             | 14             | 25             | 18             | 12             | 23             | 23             |
| Nevada                                              | 20             | 20             | 26             | 18                    | 13                    | 11             | 9              | 11             | 9              | 2              | 2              | 4              | 7              | 3              | 2              | 8              | 8              | 14             | 23             | 11             | 14             | 15             | 18             | 28             | 22             |
| New Hampshire                                       | 5              | 9              | 6              | 11                    | 15                    | 15             | 10             | 15             | 13             | 5              | 8              | 17             | 19             | 11             | 24             | 10             | 22             | 22             | 21             | 16             | 21             | 28             | 29             | 24             | 25             |
| New Jersey                                          | 4              | 0              | 2              | 1                     | 2                     | 4              | 2              | 2              | 1              | 1              | 1              | 2              | 1              | 3              | 4              | 2              | No Data        | 6              | 0              | 22             | 12             | 11             | 23             | No Data        | 30             |
| New Mexico                                          | 20             | 30             | 29             | 27                    | 29                    | 23             | 14             | 12             | 23             | 30             | 18             | 26             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| New York                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| North Carolina                                      | 8              | 14             | 10             | 11                    | 16                    | 14             | No Data        | No Data        | 12             | 11             | 5              | 7              | 15             | 28             | No Data        | 22             | 26             | 30             | 30             | 30             | 23             | 18             | 20             | 22             | 30             |
| North Dakota                                        | 7              | 10             | 11             | 13                    | 6                     | 7              | 9              | 6              | 9              | 10             | 12             | 13             | 15             | 9              | 10             | 11             | 11             | 14             | 12             | 12             | 12             | 10             | 11             | 12             | 10             |
| Ohio                                                | 19             | 30             | 30             | 30                    | 30                    | 26             | 18             | 12             | 14             | 16             | 11             | 21             | 21             | 24             | 26             | 30             | 25             | 30             | 26             | 30             | 21             | 29             | 29             | 30             | 30             |
| Oklahoma                                            | 5              | 0              | 0              | 17                    | 12                    | 7              | No Data        | 9              | 10             | 7              | 13             | 13             | 22             | 17             | 13             | 10             | 27             | 26             | 30             | 27             | 30             | 30             | 30             | No Data        | 30             |
| Oregon                                              | 0              | 4              | 20             | 19                    | 22                    | 14             | 19             | 26             | 24             | 14             | 27             | 18             | 29             | 29             | 26             | 30             | 30             | 30             | 30             | 30             | 26             | 30             | 30             | 30             | 30             |
| Pennsylvania                                        | 9              | 10             | 13             | 16                    | 22                    | 26             | 27             | 30             | 29             | 30             | 23             | 30             | 30             | 30             | 16             | 28             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Puerto Rico                                         | No Data        | No Data        | No Data        | No Data               | No Data               | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | 0              | No Data        | 1              | 0              | 1              | 0              | 3              | 4              | 1              |
| Rhode Island                                        | 20             | 30             | 30             | 30                    | 30                    | 30             | 20             | No Data        | 19             | No Data        | No Data        | No Data        | 27             | 27             | 16             | 30             | 30             | 22             | 30             | 30             | 30             | 30             | 30             | 24             | 29             |
| South Carolina                                      | 19             | 20             | 30             | 26                    | 21                    | 20             | 13             | 23             | 19             | 16             | 25             | 21             | 17             | 30             | 30             | 21             | 22             | 28             | 24             | 28             | 30             | 24             | 22             | 30             | 27             |
| South Dakota                                        | 0              | 12             | 10             | 6                     | 6                     | 9              | 10             | 7              | 6              | 7              | 6              | 12             | 11             | 9              | 8              | 10             | 11             | 13             | 14             | 13             | 11             | 12             | 17             | 14             | 24             |
| Tennessee                                           | 20             | 30             | 21             | 27                    | 12                    | 9              | 6              | 5              | 10             | 7              | 13             | 11             | 11             | 6              | 12             | 12             | 13             | 17             | 18             | 22             | 27             | 30             | 30             | 16             | 27             |
| Texas                                               | 0              | 11             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |                | No Data        | 30             |                |
| Utah                                                | 18             | 17             | 4              | 6                     | 5                     | 4              | 1              | 3              | 1              | 1              | 3              | 2              | 4              | 3              | 1              | 4              | 5              | 7              | 9              | 3              | 5              | 5              | 11             | 15             | 15             |
| Vermont                                             | 1              | 1              | 0              | 1                     | 2                     | 1              | 0              | 0              | 1              | 0              | 2              | 4              | 3              | 5              | 3              | 7              | 3              | 7              | 6              | 7              | 4              | 7              | No Data        | No Data        | No Data        |
| Virginia                                            | 8              | 6              | 17             | 13                    | 19                    | 14             | 14             | 21             | 13             | 20             | 24             | 30             | 30             | 30             | 30             | 23             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        | No Data        |
| Washington                                          | 20             | 19             | 30             | 30                    | 28                    | 20             | 30             | 30             | 30             | 30             | 26             | 22             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 25             | 18             | 23             | 28             |
| West Virginia                                       | Data           | 20             | 22             | 14                    | 18                    | 15             | 5              | 15             | 17             | 23             | 30             | 29             | 25             | 30             | 30             | 14             | 27             | 22             | 27             | 28             | 26             | 28             | 24             | 27             | 28             |
| Wisconsin                                           | 20             | 21             | 29             | 23                    | 12                    | 16             | 20             | 21             | 19             | 11             | 18             | 16             | 20             | 18             | 30             | 20             | 30             | 30             | 30             | 28             | 28             | 24             | 30             | 24             | 30             |
| Wyoming                                             | 1              | 1              | 3              | 3                     | 4                     | 4              | 3              | 6              | 6              | 5              | 7              | 10             | 4              | 10             | 4              | 10             | 5              | 7              | 6              | 5              | 4              | 4              | 4              | 11             | 2              |
| Totals                                              | 550            | 842            | 982            | 964                   | 952                   | 857            | 761            | 803            | 809            | 794            | 894            | 937            | 1,036          | 1,029          | 991            | 973            | 950            | 1,083          | 1,135          | 1,162          | 1,161          | 1,119          | 1,105          | 1,010          | 1,132          |
| Filled all slots                                    | 15             | 25             | 15             | 18                    | 13                    | 10             | 11             | 12             | 11             | 12             | 11             | 14             | 17             | 22             | 19             | 19             | 20             | 19             | 25             | 26             | 24             | 24             | 18             | 19             | 23             |
|                                                     |                |                | (GAO)          |                       | (GAO)                 |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |
| Overall Total = 24,031                              |                |                |                |                       |                       |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |



## Historical Waiver Usage (2001-2022)

- Overall Conrad 30 usage peaked in **FY20 at 1,182** but has remained **above 1,000 waivers** since **FY18**
- Since FY18, about **half of states** have filled all 30 slots

<https://www.3rnet.org/j1-filled>

| Conrad 30 State Totals from FY 2001 through FY 2022 |                |                |                |                       |                       |                |                |                |                |                |                |                |                |                |                |                        |                |                |                |                |                |                |  |  |
|-----------------------------------------------------|----------------|----------------|----------------|-----------------------|-----------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------------|----------------|----------------|----------------|----------------|----------------|----------------|--|--|
|                                                     |                |                |                |                       |                       |                |                |                |                |                |                |                |                |                |                |                        |                |                |                |                |                |                |  |  |
| State                                               | FY 01<br>Total | FY 02<br>Total | FY 03<br>Total | FY 04<br>GAO<br>Total | FY 05<br>GAO<br>Total | FY 06<br>Total | FY 07<br>Total | FY 08<br>Total | FY 09<br>Total | FY 10<br>Total | FY 11<br>Total | FY 12<br>Total | FY 13<br>Total | FY 14<br>Total | FY 15<br>Total | FY 16<br>Total         | FY 17<br>Total | FY 18<br>Total | FY 19<br>Total | FY 20<br>Total | FY 21<br>Total | FY 22<br>Total |  |  |
| Alabama                                             | 4              | 6              | 18             | 19                    | 24                    | 15             | 12             | 15             | 13             | 10             | 23             | 28             | 20             | 20             | 13             | 22                     | 16             | 18             | 17             | 26             | 27             | 25             |  |  |
| Alaska                                              | 1              | 1              | 5              | 0                     | 1                     | 3              | No Data        | No Data        | No Data        | 2              | 1              | 0              | 1              | 0              | 3              | 0                      | 2              | 0              | 6              | 0              | 2              | 1              |  |  |
| Arizona                                             | 19             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 18             | 25             | 30             | 30             | 30             | 30             | 24                     | 25             | 29             | 27             | 30             | 30             | 30             |  |  |
| Arkansas                                            | 0              | 30             | 30             | 30                    | 29                    | 14             | No Data        | 18             | No Data        | No Data        | 14             | 14             | 28             | 25             | 21             | 30                     |                | 17             | 27             | 29             | 30             | 30             |  |  |
| California                                          | 0              | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 27             | 30             | 30             | 30                     | 30             | No Data        | 30             | 30             | 23             | 28             |  |  |
| Colorado                                            | 0              | 0              | 11             | 3                     | 5                     | 9              | 9              | 7              | 13             | 5              | 13             | 13             | 11             | 14             | 7              | 9                      | 7              | 14             | 12             | 16             | 11             | 10             |  |  |
| Connecticut                                         | 20             | 20             | 27             | 30                    | 26                    | 21             | 20             | No Data        | 22             | 29             | 21             | 30             | 30             | 30             | 30             | No Data                | No Data        | 30             | 30             | 30             | 30             | 30             |  |  |
| Delaware                                            | 18             | 25             | 21             | 21                    | 16                    | 12             | 14             | 14             | 12             | 14             | 13             | 10             | 15             | 15             | 12             | 13                     | 20             | 16             | 16             | 24             | 29             | 27             |  |  |
| Dist. Of Col                                        | 9              | 7              | 3              | 9                     | 3                     | 2              | 2              | 4              | 5              | 3              | 5              | 8              | 4              | 3              | 9              | 14                     | 14             | 15             | 8              | 8              | No Data        | 9              |  |  |
| Florida                                             | 17             | 25             | 30             | 30                    | 30                    | 29             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data                | No Data        | 30             | 30             | 30             | 30             | 29             |  |  |
| Georgia                                             | 20             | 20             | 30             | 30                    | 28                    | 18             | 8              | 7              | 12             | 19             | 23             | 18             | 30             | 30             | 21             | 28                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Hawaii                                              | 0              | 0              | 2              | 1                     | 4                     | 4              | 3              | 6              | 1              | 0              | 3              | 4              | 5              | 4              | 11             | 11                     | 7              | 5              | 5              | 11             | 4              | 13             |  |  |
| Idaho                                               | 0              | 0              | 0              | 0                     | 1                     | 1              | 0              | 1              | 1              | 0              | 5              | 0              | 1              | 2              | 2              | 0                      | 0              | 4              | 4              | 1              | 1              | 5              |  |  |
| Illinois                                            | 20             | 22             | 28             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 29             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Indiana                                             | 18             | 28             | 27             | 30                    | 30                    | 29             | 14             | 18             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Iowa                                                | 20             | 30             | 30             | 30                    | 28                    | 29             | 30             | 30             | 29             | 25             | 30             | 30             | 30             | 30             | 30             | 28                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Kansas                                              | 0              | 4              | 14             | 26                    | 17                    | 17             | 14             | 16             | 13             | 16             | 22             | 23             | 28             | 24             | 25             | 30                     | 25             | 30             | 30             | 30             | 29             | 18             |  |  |
| Kentucky                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Louisiana                                           | 0              | 15             | 15             | 13                    | 10                    | 15             | 22             | 22             | 15             | 25             | 19             | 18             | 20             | 12             | 17             | 12                     | 6              | 12             | 12             | 15             | 22             | 30             |  |  |
| Maine                                               | 12             | 20             | 29             | 18                    | 25                    | 18             | 25             | 23             | 9              | 25             | 27             | 22             | 30             | 27             | 30             | 30                     | 30             | 30             | 30             | 30             | No Data        |                |  |  |
| Maryland                                            | 6              | 9              | 15             | 22                    | 29                    | 24             | 16             | 18             | 21             | 18             | 30             | 29             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Massachusetts                                       | 20             | 30             | 28             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 29             | 25             | 30             | 29             | 30                     | 0              | 30             | 29             | 30             | 30             | 26             |  |  |
| Michigan                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Minnesota                                           | 14             | 23             | 30             | 15                    | 21                    | 17             | 21             | 23             | 15             | 21             | 29             | 30             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Mississippi                                         | 14             | 13             | 19             | 17                    | 18                    | 8              | 9              | 7              | 3              | 7              | 3              | 8              | 7              | 5              | 6              | 5                      | 2              | 4              | 6              | 6              | 10             | 10             |  |  |
| Missouri                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 29             | 30             | 30             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Montana                                             | 1              | 2              | 2              | 1                     | 0                     | 0              | 3              | 6              | 2              | 1              | 2              | 2              | 4              | 2              | 7              | 10                     | 6              | 6              | 10             | 10             | 12             | No Data        |  |  |
| Nebraska                                            | 13             | 17             | 15             | 7                     | 13                    | 13             | 10             | 14             | 9              | 11             | 12             | 13             | 21             | 14             | 15             | 13                     | 15             | 18             | 19             | 14             | 25             | 18             |  |  |
| Nevada                                              | 20             | 20             | 26             | 18                    | 13                    | 11             | 9              | 11             | 9              | 2              | 2              | 4              | 7              | 3              | 2              | 8                      | 8              | 14             | 23             | 11             | 14             | 15             |  |  |
| New Hampshire                                       | 5              | 9              | 6              | 11                    | 15                    | 15             | 10             | 15             | 13             | 5              | 8              | 17             | 19             | 11             | 24             | 10                     | 22             | 22             | 21             | 16             | 21             | 28             |  |  |
| New Jersey                                          | 4              | 0              | 2              | 1                     | 2                     | 4              | 2              | 2              | 1              | 1              | 1              | 2              | 1              | 3              | 4              | 2                      | No Data        | 6              | 0              | 22             | 12             | 11             |  |  |
| New Mexico                                          | 20             | 30             | 29             | 27                    | 29                    | 23             | 14             | 12             | 23             | 30             | 18             | 26             | 29             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| New York                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| North Carolina                                      | 8              | 14             | 10             | 11                    | 16                    | 14             | No Data        | No Data        | 12             | 11             | 5              | 7              | 15             | 28             | No Data        | 22                     | 26             | 30             | 30             | 30             | 23             | 18             |  |  |
| North Dakota                                        | 7              | 10             | 11             | 13                    | 6                     | 7              | 9              | 6              | 9              | 10             | 12             | 13             | 15             | 9              | 10             | 11                     | 11             | 14             | 12             | 12             | 12             | 10             |  |  |
| Ohio                                                | 19             | 30             | 30             | 30                    | 30                    | 26             | 18             | 12             | 14             | 16             | 11             | 21             | 21             | 24             | 26             | 30                     | 25             | 30             | 26             | 30             | 21             | 29             |  |  |
| Oklahoma                                            | 5              | 0              | 0              | 17                    | 12                    | 7              | No Data        | 9              | 10             | 7              | 13             | 13             | 22             | 17             | 13             | 10                     | 27             | 26             | 30             | 27             | 30             | 30             |  |  |
| Oregon                                              | 0              | 4              | 20             | 19                    | 22                    | 14             | 19             | 26             | 24             | 14             | 27             | 18             | 29             | 29             | 26             | 30                     | 30             | 30             | 30             | 30             | 26             | 30             |  |  |
| Pennsylvania                                        | 9              | 10             | 13             | 16                    | 22                    | 26             | 27             | 30             | 29             | 30             | 23             | 30             | 30             | 30             | 16             | 28                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Puerto Rico                                         | No Data        | No Data        | No Data        | No Data               | No Data               | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data                | 0              | No Data        | 1              | 0              | 1              | 0              |  |  |
| Rhode Island                                        | 20             | 30             | 30             | 30                    | 30                    | 30             | 20             | No Data        | 19             | No Data        | No Data        | No Data        | 27             | 27             | 16             | 30                     | 30             | 22             | 30             | 30             | 30             | 30             |  |  |
| South Carolina                                      | 19             | 20             | 30             | 26                    | 21                    | 20             | 13             | 23             | 19             | 16             | 25             | 21             | 17             | 30             | 30             | 21                     | 22             | 28             | 24             | 28             | 30             | 24             |  |  |
| South Dakota                                        | 0              | 12             | 10             | 6                     | 6                     | 9              | 10             | 7              | 6              | 7              | 6              | 12             | 11             | 9              | 8              | 10                     | 11             | 13             | 14             | 13             | 11             | 12             |  |  |
| Tennessee                                           | 20             | 30             | 21             | 27                    | 12                    | 9              | 6              | 5              | 10             | 7              | 13             | 11             | 11             | 6              | 12             | 12                     | 13             | 17             | 18             | 22             | 27             | 30             |  |  |
| Texas                                               | 0              | 11             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Utah                                                | 18             | 17             | 4              | 6                     | 5                     | 4              | 1              | 3              | 1              | 1              | 3              | 2              | 4              | 3              | 1              | 4                      | 5              | 7              | 9              | 3              | 5              | 5              |  |  |
| Vermont                                             | 1              | 1              | 0              | 1                     | 2                     | 1              | 0              | 0              | 1              | 0              | 2              | 4              | 3              | 5              | 3              | 7                      | 3              | 7              | 6              | 7              | 4              | 7              |  |  |
| Virginia                                            | 8              | 6              | 17             | 13                    | 19                    | 14             | 14             | 21             | 13             | 20             | 24             | 30             | 30             | 30             | 30             | 23                     | 30             | 30             | 30             | 30             | 30             | 30             |  |  |
| Washington                                          | 20             | 19             | 30             | 30                    | 28                    | 20             | 30             | 30             | 30             | 30             | 26             | 22             | 30             | 30             | 30             | 30                     | 30             | 30             | 30             | 30             | 30             | 25             |  |  |
| West Virginia                                       | Data           | 20             | 22             | 14                    | 18                    | 15             | 5              | 15             | 17             | 23             | 30             | 29             | 25             | 30             | 30             | 14                     | 27             | 22             | 27             | 28             | 26             | 28             |  |  |
| Wisconsin                                           | 20             | 21             | 29             | 23                    | 12                    | 16             | 20             | 21             | 19             | 11             | 18             | 16             | 20             | 18             | 30             | 20                     | 30             | 30             | 30             | 28             | 28             | 24             |  |  |
| Wyoming                                             | 1              | 1              | 3              | 3                     | 4                     | 4              | 3              | 6              | 6              | 5              | 7              | 10             | 4              | 10             | 4              | 10                     | 5              | 7              | 6              | 5              | 4              | 4              |  |  |
| Totals                                              | 550            | 842            | 982            | 964                   | 952                   | 857            | 761            | 803            | 809            | 794            | 894            | 937            | 1,036          | 1,029          | 991            | 973                    | 950            | 1,083          | 1,135          | 1,162          | 1,150          | 1,119          |  |  |
| Filled all slots                                    | 15             | 25             | 15             | 18                    | 13                    | 10             | 11             | 12             | 11             | 12             | 11             | 14             | 17             | 22             | 19             | 19                     | 20             | 19             | 25             | 26             | 24             | 24             |  |  |
|                                                     |                |                | (GAO)          |                       | (GAO)                 |                |                |                |                |                |                |                |                |                |                | Overall Total = 20,773 |                |                |                |                |                |                |  |  |

# Conrad State 30 Waiver Programs: Key Points

## Plan Early!

- October 1 is the start of federal Fiscal Year and the opening date for most state Conrad 30 programs
- Some states (MN, NM, GA, etc.) permit early filing but don't make decisions until after 10/1
- Ideally you would match summer before end of residency/fellowship

## Timing for state notifications

- Depending on the timing of the state notifications, you may have time to file another waiver if not selected in that state's Conrad 30 program

## Likelihood of success?

- Understand the competitiveness of that state's Conrad 30 program & whether any other unlimited waiver programs are available



# Department of Health & Human Services Clinical Waiver

## Primary Care Only

- Family practice, general pediatrics, obstetrics/gynecology, general internal medicine (including hospitalists), or general psychiatry; and
- Board certified or board eligible in primary care discipline in the last 12 months

## Previously FQHC; Now HPSA Score of 7 or Higher

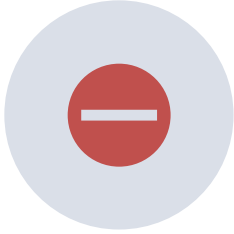
## Endorsement from State Department of Health

## Sliding Fee Scale

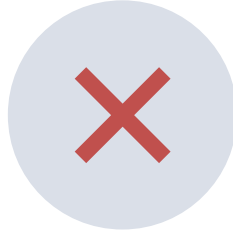
## Will not accept applications for HPSAs “Proposed for Withdrawal”

Recent turmoil and uncertainty in HHS clinical waiver program has led to dramatic increase in Conrad 30 waiver submissions for PCP

# Delta Regional Authority (DRA) Waiver Program



LIMITED TO HPSA /  
MUA/MHPSA/MUP  
WITHIN DRA REGION



NO QUOTA



45-DAY MANDATORY  
RECRUITMENT WITHIN  
12 MONTHS OF SUBMISSION

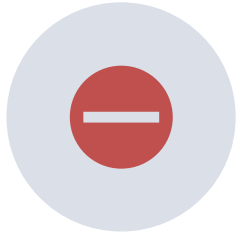


SPECIALTY & PRIMARY  
CARE PHYSICIANS

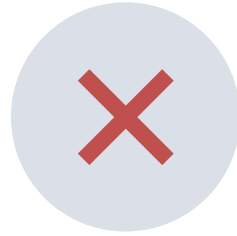


<https://dra.gov/>

# Appalachian Regional Commission (ARC) Waiver Program



LIMITED TO HPSA / MUA  
WITHIN ARC REGION



NO QUOTA



6-MONTH MANDATORY  
RECRUITMENT

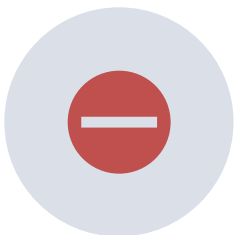


PRIMARY CARE,  
PSYCHIATRISTS, AND  
SUB-SPECIALTY  
PHYSICIANS

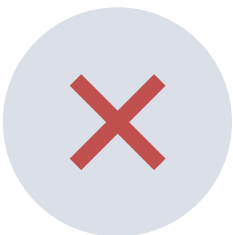


<https://arc.gov/>

# Southeast Crescent Regional Commission (SCRC) Waiver Program



LIMITED TO HPSA / MUA  
WITHIN SCRC REGION



NO QUOTA



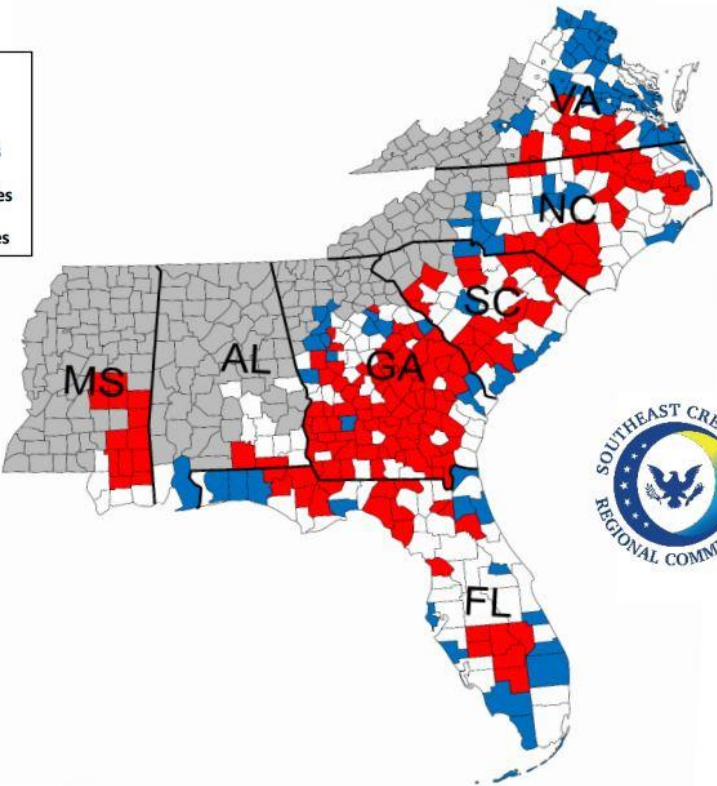
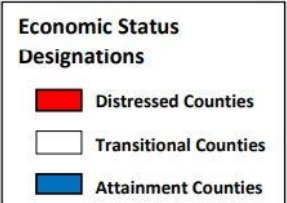
45-DAY MANDATORY  
RECRUITMENT



\$3000 APPLICATION  
FEE; \$3000 EXPEDITE  
FEE (45 DAYS)

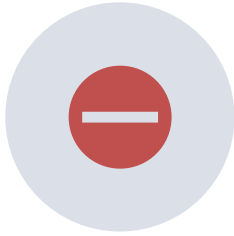


PRIMARY CARE,  
PSYCHIATRISTS, AND  
SUB-SPECIALTY  
PHYSICIANS

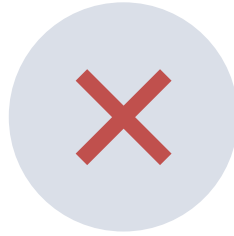


[https://scrc.gov/sites/default/files/2024-07/fy24\\_scrc\\_regional\\_map.pdf](https://scrc.gov/sites/default/files/2024-07/fy24_scrc_regional_map.pdf)

# Northern Border Regional Commission (NBRC) Waiver Program



LIMITED TO HPSA / MUA  
WITHIN REGION  
(ME, NH, NY, VT)



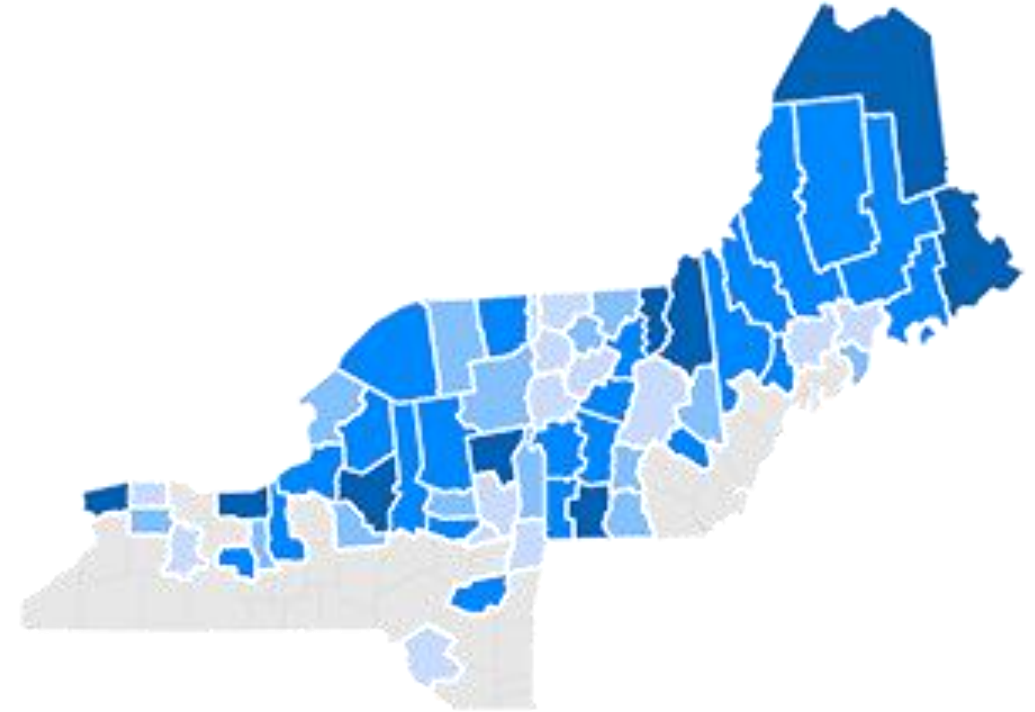
NO QUOTA



6-MONTH MANDATORY  
RECRUITMENT



PRIMARY CARE,  
PSYCHIATRISTS, AND  
SUB-SPECIALTY  
PHYSICIANS



<https://www.nbrc.gov/>

# Once Waiver Recommended by Agency

- Requires subsequent clearance by DOS and USCIS
- Timelines vary (generally 18-20+ weeks for waiver approval)
- Can file H-1B petition on DOS recommendation (preferably at least USCIS I-612 Receipt Notice)
- 3-year H-1B employment obligation





# H-1B Process

- Nonimmigrant Visa Status
- 6-Year Maximum\*
- Mandatory 3-Year H-1B Obligation
  - Except in extenuating circumstances
- Two-Step Process
  - Labor Condition Application with DOL
  - H-1B Petition with USCIS





# The \$100K H-1B Filing Fee – Background



- On September 19, 2025, a Presidential Proclamation introduced a \$100,000 fee on new H-1B visa petitions.
- Does **not apply** to candidates in US in valid status (including J-1) who change status within the United States.
- Only applies to candidates outside the United States or who need to process outside the United States (*i.e.*, at a consulate or CBP).
- While inapplicable to most J-1 waiver physicians, timing is even more important now to ensure change of status possible in the U.S.

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# Permanent Resident Options

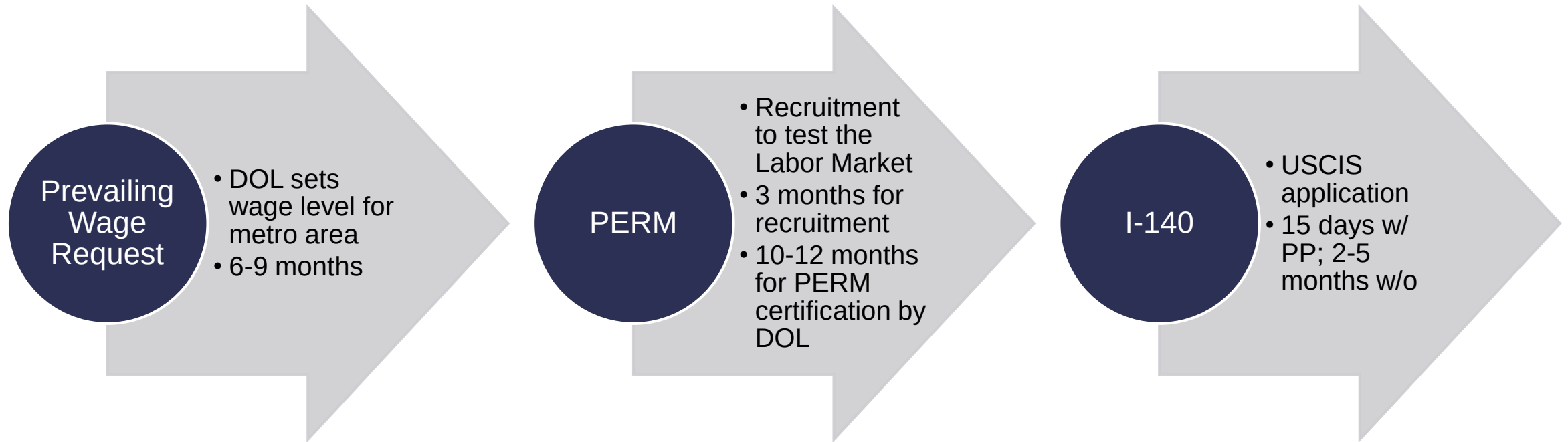


1. PERM Labor Certification



2. Physician National Interest Waiver (PNIW)

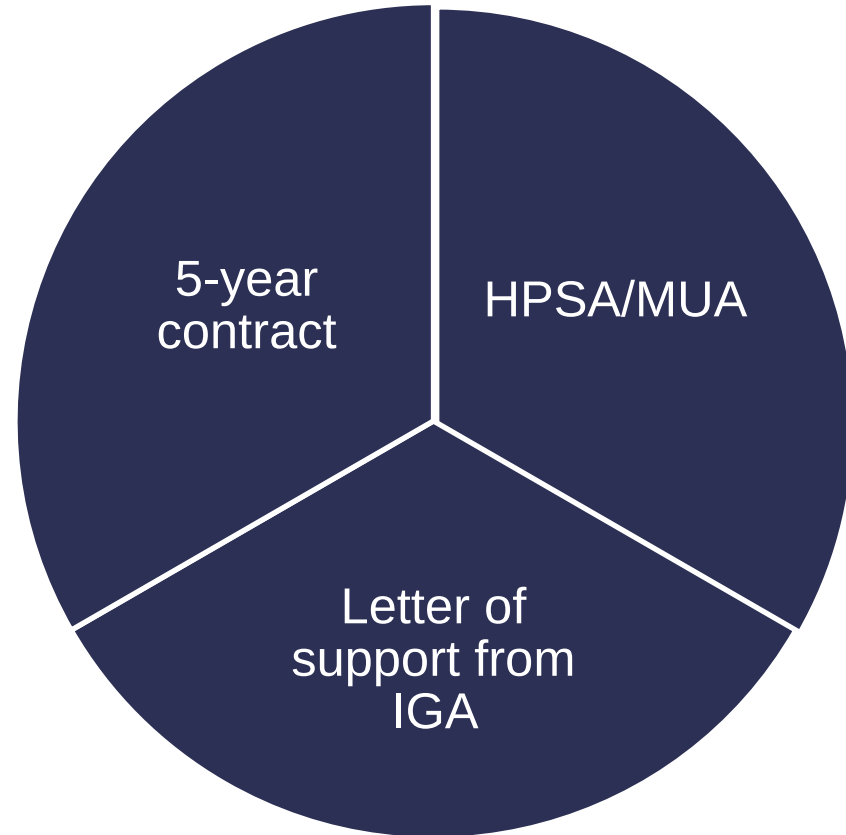
# PERM Labor Certification Process



- Tied to sponsoring employer
- Success dependent on test of labor market

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# Physician National Interest Waiver (PNIW)



- Permits early green card application (EAD/AP card)
- H-4 Spouse EAD Option
- Earliest priority date (essential for Indian and Chinese physicians)
- Allows flexibility in employer, worksite, and practice area(s)

# Monthly Visa Bulletin

- DOS updates the Visa Bulletin monthly based on available visa numbers
- Can advance or retrogress
- Determines when individual can file for permanent residence (“green card”) based on country of birth, not nationality

| Employment-based | All Chargeability Areas Except Those Listed | CHINA-mainland born | INDIA   | MEXICO  | PHILIPPINES |
|------------------|---------------------------------------------|---------------------|---------|---------|-------------|
| 1st              | C                                           | 01JUL23             | 15OCT22 | C       | C           |
| 2nd              | C                                           | 01SEP21             | U       | C       | C           |
| 3rd              | 01SEP24                                     | 01JAN22             | 01JAN14 | 01SEP24 | 01AUG23     |

*August 2026 Dates for Filing*

# J-1 Waiver Alternatives

## Alternative Options to work without securing a waiver:

- Canadian citizens and H1B “visas”
- O1 Extraordinary Ability
  - 3 of 10 regulatory requirements showing extraordinary ability in the field of endeavor (research focus)
  - Totality – how in sum your accomplishments establish working in the top of the field
  - Must secure the visa abroad

TN (no clinical work)

E-2

TPS/Asylum

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# Immigration Updates - General



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# Current Enforcement Trends

**Significant increase in enforcement staff & funding**

**Rapid terminations of statuses (e.g., Humanitarian Parole, TPS)**

**ICE “Meet and Greet” Outreach / E-Verify Communications**

**Increased Site Visits and ICE Audits**

**Aggressive Enforcement (Interviews, Domestic Flights, *Kavanaugh* Stops)**

**Rescission of Sensitive Locations Memorandum**

# Overview of TPS and Terminations

| Parole Program                                           | Current Status                                                   | Key Updates                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Notes                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CHNV Parole (Cubans, Haitians, Nicaraguans, Venezuelans) | <b>X Terminated</b>                                              | Supreme Court <u>allowed termination</u> on May 30, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Removal proceedings may begin unless alternative legal status is secured                                                                                                                                                                                                                                                            |
| Uniting for Ukraine (U4U)                                | <b>✓ Active</b>                                                  | Based on the January 20, 2025 Executive Order, <u>Securing Our Borders</u> , USCIS <u>paused acceptance of Form I-134A</u> pending further review                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Existing beneficiaries retain status; future of program uncertain<br><br>Policy memo is not publicly available, but outlined in <u>affidavit by acting deputy director of USCIS, Kika Scott</u>                                                                                                                                     |
| Afghan Parole Programs                                   | <b>✓ Suspended</b>                                               | <u>No</u> specific changes announced<br><br>As of November 27, 2025, USCIS issued a <u>Policy Alert</u> to essentially suspend the adjudication of all discretionary benefits for individuals from the 19 travel ban countries.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Beneficiaries should monitor for updates                                                                                                                                                                                                                                                                                            |
| Military Parole in Place                                 | <b>✓ Active</b>                                                  | No <u>changes</u> reported                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Continues to provide relief for eligible military families                                                                                                                                                                                                                                                                          |
| Family Reunification Program (FRP) Parole                | <b>X Terminated / Restored</b><br><b>*see ongoing litigation</b> | On January 25, 2026 an order was entered by the Federal District Court in <u>Doe v. Noem</u> that stops the termination of family reunification parole processes for Colombians, Cubans, Ecuadorians, Guatemalans, Haitians, Hondurans, and Salvadorans whose work authorizations had been issued while they were noncitizens.<br>On January 10, 2026 a Federal District Court stayed the termination of the family reunification program pending further litigation.<br>On December 15, 2025, DHS published a notice in the <u>Federal Register</u> announcing that it was terminating the parole processes for noncitizens from Colombia, Cuba, Ecuador, El Salvador, Guatemala, Haiti, and Honduras, and their immediate family members, under the Family Reunification Parole (“FRP”) processes announced, or updated, by DHS in 2023. Termination was to become effective on January 14, 2026. | Federal judge found that the government failed to properly notify parolees of the termination because the notification by publication in the Federal Register did not meet the “written notification” requirement found in the regulations.<br>Beneficiaries should monitor for updates.<br>See Practice Alert: AILA Doc #25121702. |

# Overview of TPS and Terminations

| TPS Program     | Current Status          |
|-----------------|-------------------------|
| Afghanistan     | X Terminated            |
| Burma (Myanmar) | X Terminated / Restored |
| Cameroon        | X Terminated            |
| El Salvador     | ↔ Active                |
| Ethiopia        | X Terminated            |
| Haiti           | X Terminated            |
| Lebanon         | ↔ Extended              |
| Nepal           | X Terminated            |
| Nicaragua       | X Terminated            |
| Somalia         | X Terminated / Restored |
| South Sudan     | X Terminated            |
| Sudan           | ↔ Active                |
| Syria           | X Terminated            |
| Ukraine         | ✓ Active                |
| Venezuela       | X Terminated            |
| Yemen           | X Terminated / Restored |

| #  | Designated Country | Approved Individuals |
|----|--------------------|----------------------|
| 1  | Venezuela          | 605,015              |
| 2  | Haiti              | 330,735              |
| 3  | El Salvador        | 170,125              |
| 4  | Ukraine            | 101,150              |
| 5  | Honduras           | 51,225               |
| 6  | Afghanistan        | 8,105                |
| 7  | Nepal              | 7,160                |
| 8  | Cameroon           | 4,920                |
| 9  | Ethiopia           | 4,540                |
| 10 | Syria              | 3,860                |
| 11 | Burma              | 3,670                |
| 12 | Nicaragua          | 2,910                |
| 13 | Sudan              | 1,790                |
| 14 | Yemen              | 1,380                |
| 15 | Somalia            | 705                  |
| 16 | South Sudan        | 210                  |
| 17 | Lebanon            | 140                  |

| TPS Holders by State of Residence |                |             |    |                  |             |
|-----------------------------------|----------------|-------------|----|------------------|-------------|
| #                                 | State          | TPS Holders | #  | State            | TPS Holders |
| 1                                 | Florida        | 403,965     | 27 | Oregon           | 5,670       |
| 2                                 | Texas          | 147,080     | 28 | Oklahoma         | 5,610       |
| 3                                 | New York       | 98,250      | 29 | Wisconsin        | 5,245       |
| 4                                 | California     | 79,320      | 30 | Missouri         | 5,095       |
| 5                                 | Georgia        | 50,110      | 31 | Delaware         | 4,840       |
| 6                                 | Illinois       | 46,510      | 32 | Iowa             | 4,055       |
| 7                                 | New Jersey     | 46,360      | 32 | Louisiana        | 4,055       |
| 8                                 | Massachusetts  | 44,825      | 34 | Kansas           | 3,620       |
| 9                                 | Indiana        | 34,575      | 35 | Washington, D.C. | 3,550       |
| 10                                | Maryland       | 33,680      | 36 | Arkansas         | 3,490       |
| 11                                | North Carolina | 32,420      | 37 | Nebraska         | 2,730       |
| 12                                | Virginia       | 29,970      | 38 | Rhode Island     | 2,265       |
| 13                                | Ohio           | 26,490      | 39 | Mississippi      | 1,080       |
| 14                                | Pennsylvania   | 23,770      | 40 | Idaho            | 1,060       |
| 15                                | Tennessee      | 20,200      | 41 | New Mexico       | 1,025       |
| 16                                | Utah           | 20,100      | 42 | North Dakota     | 940         |
| 17                                | Washington     | 18,065      | 43 | New Hampshire    | 880         |
| 18                                | Colorado       | 16,570      | 44 | Maine            | 715         |
| 19                                | South Carolina | 10,655      | 45 | South Dakota     | 670         |
| 20                                | Connecticut    | 9,460       | 46 | West Virginia    | 510         |
| 21                                | Minnesota      | 8,460       | 47 | Alaska           | 475         |
| 22                                | Michigan       | 8,095       | 48 | Hawaii           | 400         |
| 23                                | Arizona        | 6,530       | 49 | Montana          | 390         |
| 24                                | Kentucky       | 5,915       | 50 | Vermont          | 215         |
| 25                                | Alabama        | 5,830       | 51 | Wyoming          | 210         |
| 26                                | Nevada         | 5,825       | #  | Other/Unknown    | 5,805       |

# Travel Bans



<https://www.nytimes.com/interactive/2025/06/04/us/politics/trump-travel-ban-map.html>

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# Immigration Updates – Healthcare Immigration

# Physician Immigration Updates

- HHS – Recommendations Frozen from October 2025 – March 2026
- SCRC – Recommendations Taking > 3 months (2x prior time)
- USCIS Freeze in Adjudications of Cases (H-1B, AOS)
- End of D/S status (9/15/26)
- Canadians = IMGs (if Canadian degree issued after 7/1/2025, must have USMLEs)
- \$100,000 H-1B Visa Fee

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# HRSA Redesignations

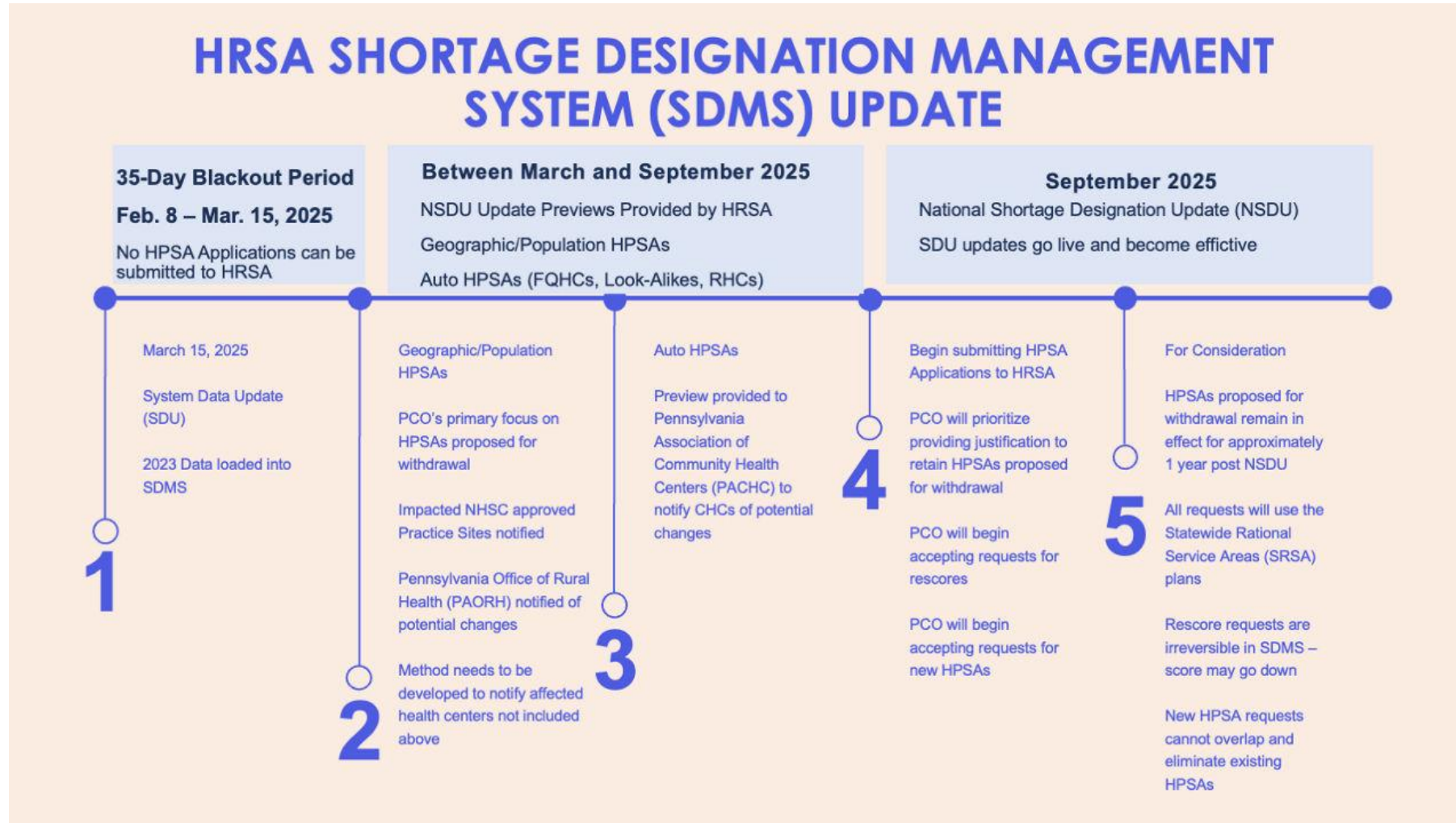
## 9/23/25 HRSA Redesignations

- Massive Changes to HPSA Scores
- Many Sites “Proposed for Withdrawal”
- Announced 9/23/25; delayed effective date (7/1/2027)
- Immediately impacted eligibility for some waivers (HHS) and impacted Conrad 30 waiver odds
- Once final, will impact all waiver programs & PNIW permanent residence options

## Fed Shortage Designation Project

- Began in 2014
- Aims to update existing geographic, population, and facility HPSA designations
- Using standardized national data sets from direct sources, including:
  - National Provider Index (NPI)
  - American Community Survey
  - Centers for Disease Control and Prevention (CDC)

# HRSA Redesignations



<https://www.pa.gov/agencies/health/healthcare-and-public-health-professionals/primary-care/shortage-designations>



# HPSA Redesignation Examples

**In a Primary Care HPSA:** ✓ Yes

**HPSA Name:** LI-St. Cloud/St. Joseph

**ID:** 1276766868

**Designation Type:** HPSA Population

**Status:** Proposed For Withdrawal

**HPSA Score:** 15

**PC MCTA Score:** 15

**Designation Date:** 03/30/2022

**Last Update Date:** 09/22/2025

**In a Primary Care HPSA:** ✓ Yes

**HPSA Name:** LI - Southwest Atlanta

**ID:** 1132395327

**Designation Type:** HPSA Population

**Status:** Proposed For Withdrawal

**HPSA Score:** 20

**PC MCTA Score:** 14

**Designation Date:** 04/26/2012

**Last Update Date:** 09/22/2025

**In a Primary Care HPSA:** ✓ Yes

**HPSA Name:** LI - Tampa/Brandon/Riverview

**ID:** 1126302671

**Designation Type:** HPSA Population

**Status:** Proposed For Withdrawal

**HPSA Score:** 16

**PC MCTA Score:** 14

**Designation Date:** 03/08/2022

**Last Update Date:** 09/22/2025

**In a MUA/P:** ✓ Yes

**Service Area Name:** Low Inc - East Tampa/ Ybor City

**ID:** 06101

**Designation Type:** Medically Underserved Population

**Designation Date:** 05/13/2003

**Last Update Date:** 02/12/2008

# Impact of HPSA Redesignations

## Immediate Impact (9/23/25)

- Ineligibility for HHS clinical waivers in HPSAs “Proposed for Withdrawal,” regardless of prior HPSA score
- Inundation of State DOH Conrad 30 waiver programs, which are capped at 30.
- Physician National Interest Waiver Permanent Residence Applications
- Significant state resources shifted to providing updated data to HRSA

## Prospective Impact (7/2026)

- If HPSA designations become final, former HPSA worksites will no longer support other J-1 waiver applications (if not also MUA)
- Fewer J-1 waiver physicians will impact healthcare access in rural and medically underserved America for at least next 3-5 years

# Impact of HPSA Redesignations (continued)

- While the following impacts do not affect/apply to J-1 waiver physicians directly, they do impact the rural and medically underserved communities in which they practice:
  - National Loan Repayment Program (NHSC) & State Offices of Rural Health/Primary Care
    - Only available for USC/US Nationals practicing primary care in a HPSA worksite
  - Medicare Bonus Payments – Physicians receive 10% bonus in HPSAs
  - Medicaid Bonus Payments – Physicians receive 20% for primary care/emergency services and 50% for OBGYN services
  - Grants & GME – Extra points often awarded to applications for HPSA physicians

## Impact of HPSA Redesignations (continued)

**Sauve-Syed, Jessica, “The impacts of shortage area designations on mortality,” *Contemporary Economic Policy* (Apr. 14, 2025)**

- **HPSA-designated counties experience 3.8% decline in overall mortality after designation**
  - 6% decline in cancer deaths
  - 13% decline in stroke deaths

# Thank you!



**Matthew Webster**

*Senior Attorney*

612.492.7234

[mwebster@fredlaw.com](mailto:mwebster@fredlaw.com)

# Fredrikson



*Where Law and Business Meet®*

# Breakout Session 2: Immigration Exchange – Best Practices & Peer Networking

3RNET

Matthew Webster  
August 26, 2026

**Fredrikson**

# Table Instructions



- Please sit 3-5 people per table, to ensure that everyone gets to participate in each discussion session.
- Please sit with people from different states so that you can be sure to hear different ideas during our breakout discussions.



# Discussion – State Self Assessment



What grade would you give your state's Conrad program? Why?

What is driving that grade and your state numbers?

What is driving total IMG physician placement in your state?

Are you tracking performance? Total #s from all programs?

## Historical Waiver Usage (FY25)

- In FY22, **23/50 states** filled all 30 Conrad slots.
- Only **13%** of Conrad 30 waiver slots were filled by Primary Care Physicians
- **82%** of Conrad 30 slots were for Specialists
- **72%** of Conrad 30 slots were for non-rural placements
- Only **17%** were FLEX spots (non-HPSA/MUA)

<https://www.3rnet.org/j1-filled>

| FFY 2025 10/24 to 9/25 |                      |       |            |       |           |       |         |              |
|------------------------|----------------------|-------|------------|-------|-----------|-------|---------|--------------|
| State                  | Primary Care         | Psych | Specialist | Rural | Non-Rural | Split | Flex 10 | FFY 25 Total |
| Alabama                | 2                    | 0     | 25         | 0     | 27        | 0     | 0       | 27           |
| Alaska                 | 0                    | 0     | 2          | 0     | 0         | 2     | 0       | 2            |
| Arizona                | 6                    | 0     | 24         | 9     | 21        | 0     | 0       | 30           |
| Arkansas               | 13                   | 0     | 17         | 3     | 26        | 1     | 0       | 30           |
| California             | Total Only Available |       |            |       |           |       |         |              |
| Colorado               | 0                    | 0     | 18         | 0     | 18        | 0     | 5       | 18           |
| Connecticut            | 3                    | 2     | 25         | 0     | 30        | 0     | 3       | 30           |
| Delaware               | 1                    | 2     | 17         | 6     | 14        | 0     | 0       | 20           |
| Dist. Of Col           | 8                    | 0     | 6          | 0     | 14        | 0     | 0       | 14           |
| Florida                | No Data Available    |       |            |       |           |       |         |              |
| Georgia                | No Data Available    |       |            |       |           |       |         |              |
| Hawaii                 | 1                    | 0     | 8          | 2     | 7         | 0     | 7       | 9            |
| Idaho                  | 0                    | 0     | 3          | 3     | 0         | 0     | 0       | 3            |
| Illinois               | 4                    | 2     | 24         | 3     | 27        | 0     | 2       | 30           |
| Indiana                | 6                    | 1     | 23         | 1     | 22        | 7     | 0       | 30           |
| Iowa                   | 1                    | 0     | 28         | 1     | 28        | 0     | 0       | 29           |
| Kansas                 | 1                    | 0     | 14         | 0     | 15        | 0     | 2       | 15           |
| Kentucky               | 4                    | 1     | 25         | 16    | 14        | 0     | 5       | 30           |
| Louisiana              | 2                    | 0     | 28         | 22    | 2         | 6     | 8       | 30           |
| Maine                  | 1                    | 0     | 29         | 20    | 10        | 0     | 10      | 30           |
| Maryland               | 3                    | 1     | 25         | 14    | 13        | 2     | 5       | 29           |
| Massachusetts          | 5                    | 1     | 25         | 2     | 29        | 0     | 5       | 31           |
| Michigan               | 2                    | 4     | 24         | 3     | 25        | 2     | 0       | 30           |
| Minnesota              | 2                    | 0     | 28         | 5     | 25        | 0     | 2       | 30           |
| Mississippi            | 2                    | 0     | 2          | 0     | 4         | 0     | 0       | 4            |
| Missouri               | 0                    | 0     | 30         | 0     | 30        | 0     | 0       | 30           |
| Montana                | 2                    | 1     | 7          | 2     | 8         | 0     | 8       | 10           |
| Nebraska               | 5                    | 0     | 18         | 6     | 17        | 0     | 10      | 23           |
| Nevada                 | 1                    | 1     | 20         | 0     | 17        | 5     | 2       | 22           |
| New Hampshire          | 8                    | 0     | 17         | 10    | 15        | 0     | 10      | 25           |
| New Jersey             | 2                    | 1     | 27         | 0     | 30        | 0     | 9       | 30           |
| New Mexico             | 4                    | 0     | 26         | 5     | 25        | 0     | 0       | 30           |
| New York               | 0                    | 1     | 29         | 3     | 27        | 0     | 4       | 30           |
| North Carolina         | 9                    | 1     | 20         | 20    | 10        | 0     | 10      | 30           |
| North Dakota           | 0                    | 0     | 10         | 0     | 10        | 0     | 10      | 10           |
| Ohio                   | 0                    | 0     | 30         | 4     | 26        | 0     | 1       | 30           |
| Oklahoma               | 0                    | 1     | 29         | 3     | 27        | 0     | 10      | 30           |
| Oregon                 | 10                   | 0     | 20         | 3     | 26        | 1     | 4       | 30           |
| Pennsylvania           | 6                    | 0     | 24         | 12    | 18        | 0     | 3       | 30           |
| Puerto Rico            | 0                    | 0     | 1          | 0     | 1         | 0     | 1       | 1            |
| Rhode Island           | 6                    | 3     | 20         | 0     | 29        | 0     | 10      | 29           |
| South Carolina         | 4                    | 0     | 23         | 5     | 21        | 1     | 5       | 27           |
| South Dakota           | 0                    | 0     | 24         | 14    | 10        | 0     | 10      | 24           |
| Tennessee              | 0                    | 2     | 25         | 11    | 16        | 0     | 0       | 27           |
| Texas                  | 1                    | 3     | 26         | 3     | 27        | 0     | 0       | 30           |
| Utah                   | 1                    | 0     | 14         | 1     | 14        | 0     | 10      | 15           |
| Vermont                | No Data Available    |       |            |       |           |       |         |              |
| Virginia               | No Data Available    |       |            |       |           |       |         |              |
| Washington             | 3                    | 1     | 24         | 2     | 26        | 0     | 3       | 28           |
| West Virginia          | 1                    | 0     | 27         | 25    | 3         | 0     | 3       | 28           |
| Wisconsin              | 15                   | 0     | 15         | 20    | 10        | 0     | 10      | 30           |
| Wyoming                | 0                    | 0     | 2          | 2     | 0         | 0     | 0       | 2            |
| Totals                 | 145                  | 29    | 928        | 261   | 814       | 27    | 187     | 1,132        |
| Filled all slots       |                      |       |            |       |           |       |         | 23           |

SHOW  
AND TELL

Historical  
Waiver Usage  
(2001-2025)

- Overall Conrad 30 usage peaked in **FY20 at 1,182** but has remained **above 1,000** waivers since **FY18**
- Since FY18, about **half of states** have filled all 30 slots

SHOW  
AND  
TELL

| Conrad 30 State Totals from FY 2001 through FY 2025 |                |                |                |                       |                       |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |
|-----------------------------------------------------|----------------|----------------|----------------|-----------------------|-----------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| State                                               | FY 01<br>Total | FY 02<br>Total | FY 03<br>Total | FY 04<br>GAO<br>Total | FY 05<br>GAO<br>Total | FY 06<br>Total | FY 07<br>Total | FY 08<br>Total | FY 09<br>Total | FY 10<br>Total | FY 11<br>Total | FY 12<br>Total | FY 13<br>Total | FY 14<br>Total | FY 15<br>Total | FY 16<br>Total | FY 17<br>Total | FY 18<br>Total | FY 19<br>Total | FY 20<br>Total | FY 21<br>Total | FY 22<br>Total | FY 23<br>Total | FY 24<br>Total | FY 25<br>Total |
| Alabama                                             | 4              | 6              | 18             | 19                    | 24                    | 15             | 12             | 15             | 13             | 10             | 23             | 28             | 20             | 20             | 13             | 22             | 16             | 18             | 17             | 26             | 27             | 25             | 26             | 29             | 27             |
| Alaska                                              | 1              | 1              | 5              | 0                     | 1                     | 3              | No Data        | No Data        | No Data        | 2              | 1              | 0              | 1              | 0              | 3              | 0              | 2              | 0              | 6              | 0              | 2              | 1              | 5              | 0              | 2              |
| Arizona                                             | 19             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 18             | 25             | 30             | 30             | 30             | 30             | 24             | 25             | 29             | 27             | 30             | 30             | 30             | 26             | 30             | 30             |
| Arkansas                                            | 0              | 30             | 30             | 30                    | 29                    | 14             | No Data        | 18             | No Data        | No Data        | 14             | 14             | 28             | 25             | 21             | 30             |                | 17             | 27             | 29             | 30             | 30             | 24             | 30             | 30             |
| California                                          | 0              | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 27             | 30             | 30             | 30             | 30             | No Data        | 30             | 30             | 23             | 28             | No Data        | 29             | 30             |
| Colorado                                            | 0              | 0              | 11             | 3                     | 5                     | 9              | 9              | 7              | 13             | 5              | 13             | 13             | 11             | 14             | 7              | 9              | 7              | 14             | 12             | 16             | 11             | 10             | 11             | 18             | 18             |
| Connecticut                                         | 20             | 20             | 27             | 30                    | 26                    | 21             | 20             | No Data        | 22             | 29             | 21             | 30             | 30             | 30             | 30             | No Data        | No Data        | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Delaware                                            | 18             | 25             | 21             | 21                    | 16                    | 12             | 14             | 14             | 12             | 14             | 13             | 10             | 15             | 15             | 12             | 13             | 20             | 16             | 16             | 24             | 29             | 27             | No Data        | 20             |                |
| Dist. Of Col                                        | 9              | 7              | 3              | 9                     | 3                     | 2              | 2              | 4              | 5              | 3              | 5              | 8              | 4              | 3              | 9              | 14             | 14             | 15             | 8              | 8              | 11             | 9              | 15             | 10             | 14             |
| Florida                                             | 17             | 25             | 30             | 30                    | 30                    | 29             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        | No Data        | 30             | 30             | 30             | 30             | 29             | 30             | No Data        | No Data        |
| Georgia                                             | 20             | 20             | 30             | 30                    | 28                    | 18             | 8              | 7              | 12             | 19             | 23             | 18             | 30             | 30             | 21             | 28             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        |                |
| Hawaii                                              | 0              | 0              | 2              | 1                     | 4                     | 4              | 3              | 6              | 1              | 0              | 3              | 4              | 5              | 4              | 11             | 11             | 7              | 5              | 5              | 11             | 4              | 13             | 12             | 14             | 9              |
| Idaho                                               | 0              | 0              | 0              | 0                     | 1                     | 1              | 0              | 1              | 1              | 0              | 5              | 0              | 1              | 2              | 2              | 0              | 0              | 4              | 4              | 1              | 1              | 5              | 6              | 1              | 3              |
| Illinois                                            | 20             | 22             | 28             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        | 30             |                |
| Indiana                                             | 18             | 28             | 27             | 30                    | 30                    | 29             | 14             | 18             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Iowa                                                | 20             | 30             | 30             | 30                    | 28                    | 29             | 30             | 30             | 29             | 25             | 30             | 30             | 30             | 30             | 28             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 29             | 29             |
| Kansas                                              | 0              | 4              | 14             | 26                    | 17                    | 17             | 14             | 16             | 13             | 16             | 22             | 23             | 28             | 24             | 25             | 30             | 25             | 30             | 30             | 30             | 29             | 18             | 21             | 30             | 15             |
| Kentucky                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Louisiana                                           | 0              | 15             | 15             | 13                    | 10                    | 15             | 22             | 22             | 15             | 25             | 19             | 18             | 20             | 12             | 17             | 12             | 6              | 12             | 12             | 15             | 22             | 30             | 30             | 30             | 30             |
| Maine                                               | 12             | 20             | 29             | 18                    | 25                    | 18             | 25             | 23             | 9              | 25             | 27             | 22             | 30             | 27             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        | 29             | 30             | 30             | 30             |
| Maryland                                            | 6              | 9              | 15             | 22                    | 29                    | 24             | 16             | 18             | 21             | 18             | 30             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 28             | 27             | 29             |
| Massachusetts                                       | 20             | 30             | 28             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 29             | 25             | 30             | 29             | 30             | 0              | 30             | 29             | 30             | 30             | 26             | 26             | 30             | 31             |
| Michigan                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Minnesota                                           | 14             | 23             | 30             | 15                    | 21                    | 17             | 21             | 23             | 15             | 21             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Mississippi                                         | 14             | 13             | 19             | 17                    | 18                    | 8              | 9              | 7              | 3              | 7              | 3              | 8              | 7              | 5              | 6              | 5              | 2              | 4              | 6              | 6              | 10             | 10             | 8              | 5              | 4              |
| Missouri                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Montana                                             | 1              | 2              | 2              | 1                     | 0                     | 0              | 3              | 6              | 2              | 1              | 2              | 2              | 4              | 2              | 7              | 10             | 6              | 6              | 10             | 10             | 12             | No Data        | No Data        | 11             | 10             |
| Nebraska                                            | 13             | 17             | 15             | 7                     | 13                    | 13             | 10             | 14             | 9              | 11             | 12             | 13             | 21             | 14             | 15             | 13             | 15             | 18             | 19             | 14             | 25             | 18             | 12             | 23             | 23             |
| Nevada                                              | 20             | 20             | 26             | 18                    | 13                    | 11             | 9              | 11             | 9              | 2              | 2              | 4              | 7              | 3              | 2              | 8              | 8              | 14             | 23             | 11             | 14             | 15             | 18             | 28             | 22             |
| New Hampshire                                       | 5              | 9              | 6              | 11                    | 15                    | 15             | 10             | 15             | 13             | 5              | 8              | 17             | 19             | 11             | 24             | 10             | 22             | 22             | 21             | 16             | 21             | 28             | 29             | 24             | 25             |
| New Jersey                                          | 4              | 0              | 2              | 1                     | 2                     | 4              | 2              | 2              | 1              | 1              | 1              | 2              | 1              | 3              | 4              | 2              | No Data        | 6              | 0              | 22             | 12             | 11             | 23             | No Data        | 30             |
| New Mexico                                          | 20             | 30             | 29             | 27                    | 29                    | 23             | 14             | 12             | 23             | 30             | 18             | 26             | 29             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| New York                                            | 20             | 30             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| North Carolina                                      | 8              | 14             | 10             | 11                    | 16                    | 14             | No Data        | No Data        | 12             | 11             | 5              | 7              | 15             | 28             | No Data        | 22             | 26             | 30             | 30             | 30             | 23             | 18             | 20             | 22             | 30             |
| North Dakota                                        | 7              | 10             | 11             | 13                    | 6                     | 7              | 9              | 6              | 9              | 10             | 12             | 13             | 15             | 9              | 10             | 11             | 11             | 14             | 12             | 12             | 12             | 10             | 11             | 12             | 10             |
| Ohio                                                | 19             | 30             | 30             | 30                    | 30                    | 26             | 18             | 12             | 14             | 16             | 11             | 21             | 21             | 24             | 26             | 30             | 25             | 30             | 26             | 30             | 21             | 29             | 29             | 30             | 30             |
| Oklahoma                                            | 5              | 0              | 0              | 17                    | 12                    | 7              | No Data        | 9              | 10             | 7              | 13             | 13             | 22             | 17             | 13             | 10             | 27             | 26             | 30             | 27             | 30             | 30             | 30             | No Data        | 30             |
| Oregon                                              | 0              | 4              | 20             | 19                    | 22                    | 14             | 19             | 26             | 24             | 14             | 27             | 18             | 29             | 29             | 26             | 30             | 30             | 30             | 30             | 30             | 26             | 30             | 30             | 30             | 30             |
| Pennsylvania                                        | 9              | 10             | 13             | 16                    | 22                    | 26             | 27             | 30             | 29             | 30             | 23             | 30             | 30             | 30             | 16             | 28             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |
| Puerto Rico                                         | No Data        | No Data        | No Data        | No Data               | No Data               | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | No Data        | 0              | No Data        | 1              | 0              | 1              | 0              | 3              | 4              | 1              |
| Rhode Island                                        | 20             | 30             | 30             | 30                    | 30                    | 30             | 20             | No Data        | 19             | No Data        | No Data        | No Data        | 27             | 27             | 16             | 30             | 30             | 22             | 30             | 30             | 30             | 30             | 30             | 24             | 29             |
| South Carolina                                      | 19             | 20             | 30             | 26                    | 21                    | 20             | 13             | 23             | 19             | 16             | 25             | 21             | 17             | 30             | 30             | 21             | 22             | 28             | 24             | 28             | 30             | 24             | 22             | 30             | 27             |
| South Dakota                                        | 0              | 12             | 10             | 6                     | 6                     | 9              | 10             | 7              | 6              | 7              | 6              | 12             | 11             | 9              | 8              | 10             | 11             | 13             | 14             | 13             | 11             | 12             | 17             | 14             | 24             |
| Tennessee                                           | 20             | 30             | 21             | 27                    | 12                    | 9              | 6              | 5              | 10             | 7              | 13             | 11             | 11             | 6              | 12             | 12             | 13             | 17             | 18             | 22             | 27             | 30             | 30             | 16             | 27             |
| Texas                                               | 0              | 11             | 30             | 30                    | 30                    | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             |                | No Data        | 30             |                |
| Utah                                                | 18             | 17             | 4              | 6                     | 5                     | 4              | 1              | 3              | 1              | 1              | 3              | 2              | 4              | 3              | 1              | 4              | 5              | 7              | 9              | 3              | 5              | 5              | 11             | 15             | 15             |
| Vermont                                             | 1              | 1              | 0              | 1                     | 2                     | 1              | 0              | 0              | 1              | 0              | 2              | 4              | 3              | 5              | 3              | 7              | 3              | 7              | 6              | 7              | 4              | 7              | No Data        | No Data        | No Data        |
| Virginia                                            | 8              | 6              | 17             | 13                    | 19                    | 14             | 14             | 21             | 13             | 20             | 24             | 30             | 30             | 30             | 30             | 23             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | No Data        | No Data        |
| Washington                                          | 20             | 19             | 30             | 30                    | 28                    | 20             | 30             | 30             | 30             | 30             | 26             | 22             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 30             | 25             | 18             | 23             | 28             |
| West Virginia                                       | Data           | 20             | 22             | 14                    | 18                    | 15             | 5              | 15             | 17             | 23             | 30             | 29             | 25             | 30             | 30             | 14             | 27             | 22             | 27             | 28             | 26             | 28             | 24             | 27             | 28             |
| Wisconsin                                           | 20             | 21             | 29             | 23                    | 12                    | 16             | 20             | 21             | 19             | 11             | 18             | 16             | 20             | 18             | 30             | 20             | 30             | 30             | 30             | 28             | 28             | 24             | 30             | 24             | 30             |
| Wyoming                                             | 1              | 1              | 3              | 3                     | 4                     | 4              | 3              | 6              | 6              | 5              | 7              | 10             | 4              | 10             | 4              | 10             | 5              | 7              | 6              | 5              | 4              | 4              | 4              | 11             | 2              |
| Totals                                              | 550            | 842            | 982            | 964                   | 952                   | 857            | 761            | 803            | 809            | 794            | 894            | 937            | 1,036          | 1,029          | 991            | 973            | 950            | 1,083          | 1,135          | 1,162          | 1,161          | 1,119          | 1,105          | 1,010          | 1,132          |
| Filled all slots                                    | 15             | 25             | 15             | 18                    | 13                    | 10             | 11             | 12             | 11             | 12             | 11             | 14             | 17             | 22             | 19             | 19             | 20             | 19             | 25             | 26             | 24             | 24             | 18             | 19             | 23             |
|                                                     |                |                | (GAO)          |                       | (GAO)                 |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |
| Overall Total = 24,031                              |                |                |                |                       |                       |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |                |

<https://www.3rnet.org/j1-filled>

# What are the Federal Requirements for IGA Waivers?

Conrad Program Only - Limit of 30 waivers/fiscal year

- Medically underserved placements: up to 30
- FLEX waivers: 10

Full-time employment/ 40 hours clinical care in HPSA/MUA/MUP worksite

Need to agree to work in position within 90 days of waiver issuance

3-year H-1B employment obligation

# Conrad State 30 Waiver Program: What Is It?

- Allows state DOH to recommend up to 30 physicians/ year who will serve the public interest
- Public policy focus: expanding the safety net
- Federal-State partnership
  - Federal: creates basic structure
  - State:
    - *Fill in the blanks*
    - *Administer the program to meet needs of State*
    - *NOTE: Unless codified or subject to state regulations, State DOH has wide latitude to craft Conrad 30 program to meet **patient needs** & **maximize waiver usage***

# Discussion – Conrad Guidelines/Requirements



How has your state waiver strategy changed since COVID-19?  
Since 2025?

Are you actively and strategically using all available IGA waivers?  
If not, why not?

What are your obstacles to full waiver usage?

What state Conrad requirements are unnecessary or not serving  
your state's objectives and strategy?

What are ways states/institutions have increased J-1 waiver  
usage?

# State Conrad Waiver Nuances that Matter

 Special Application Periods (“First in, First out,” 60-day filing period, phased filings, etc.)

 Primary Care vs. Specialty Care

 Primary Care: Definition & Scope

 Historical Usage Numbers & Competitiveness

 Limitations on Underserved Designations

 FLEX Policy & Competitiveness

 Non-Compete & Other Contract Language Requirements

 Departure Policies & Reporting Requirements

 Limitation on # of waivers per employer

 Additional forms/affidavits?

 Timing of program application/consideration/decision periods



# J-1 Waiver – Sticky Wickets

- Hospitalists
- Forensic Pathologists
- Telehealth & Remote Work
  - J-1 Waiver Compliance
    - The INA & DHS/DOS regulations are silent on whether IMGs can satisfy waiver by providing telehealth services.
    - During COVID-19 National Emergency, USCIS offered flexibility for J-1 waiver physicians to provide fulfill their J-1 waiver requirements by providing telehealth.
    - This flexibility has ended, so the conservative approach is that telemedicine cannot satisfy the J-1 waiver requirement (*i.e.*, generally 40 hours of direct patient care).
  - H-1B status
    - For H-1B purposes, telemedicine is acceptable.
    - The conservative approach is to list both worksite and remote location(s) to meet prevailing wages.
- Reallocation of waiver numbers for denied or abandoned case(s)



# Discussion – State IMG Retention & LPR



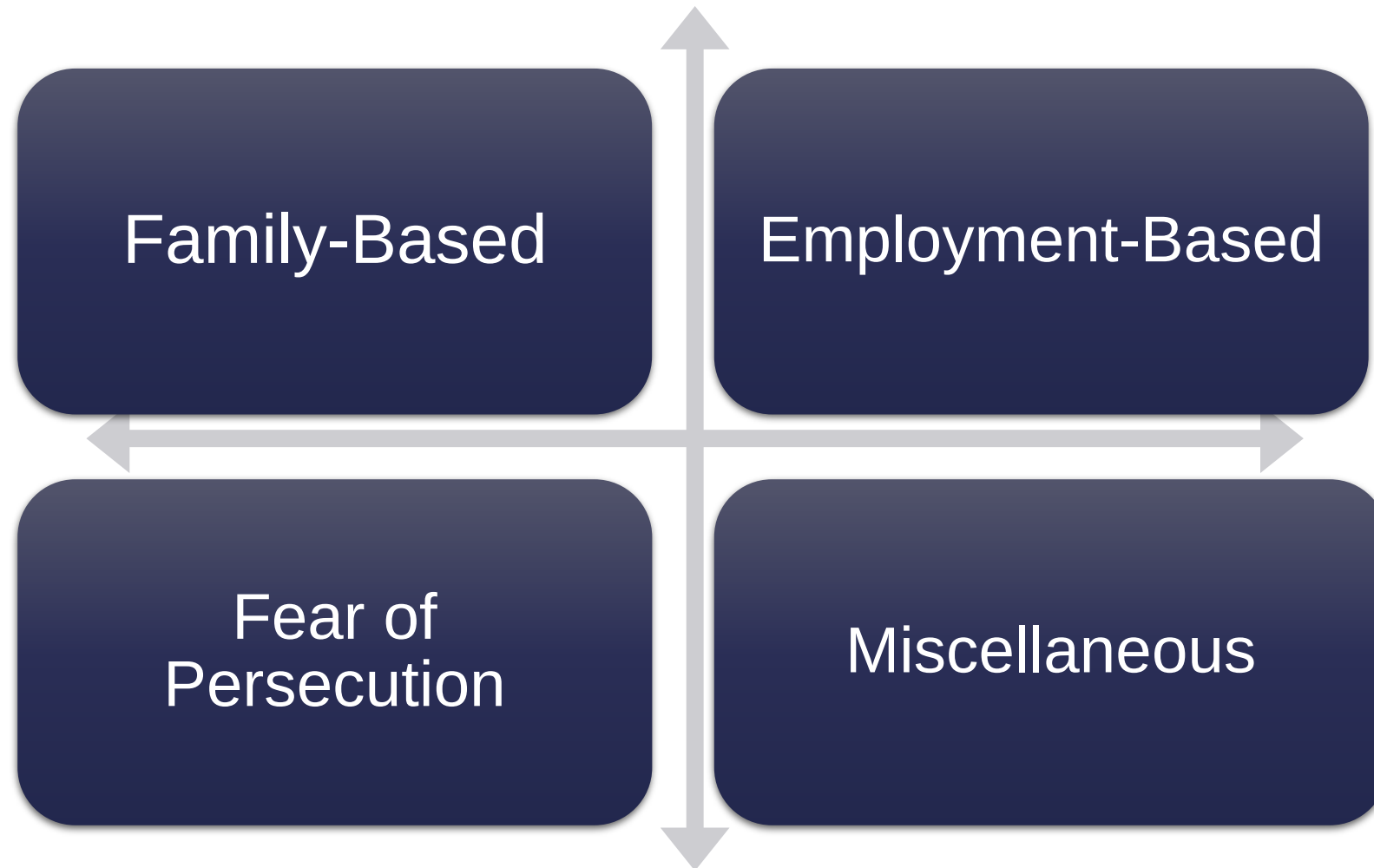
How can permanent residence sponsorship/support drive physician satisfaction and retention for you?

What does your state require for PNIW support and why?

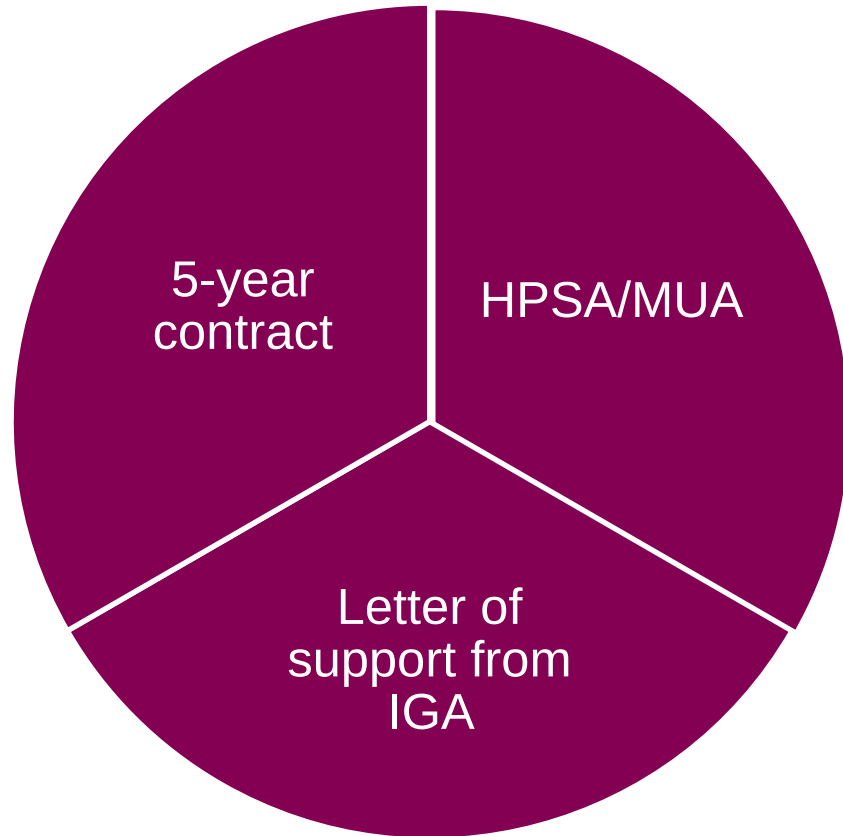
What data/reporting/tracking do you have to measure retention?

What changes can you make to your immigration policies and sponsorship model to increase physician satisfaction and retention?

# Basic Strategy Options for Permanent Residence



# Physician National Interest Waiver



- Permits early green card application (EAD/AP card)
- H-4 EAD Option
- Earlier priority date (essential for Indian and Chinese physicians)

# Thank you!



**Matthew Webster**

*Senior Attorney*

612.492.7234

[mwebster@fredlaw.com](mailto:mwebster@fredlaw.com)

# Fredrikson



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