



2022 Guidance for Dentistry Programs on Considering Applicants with Undocumented Status (DACA, TPS, or no SSN)

This brief communication guides dentistry programs on considering undocumented applicants with temporary benefits or protections while in the United States and applicants without a Social Security Number (SSN). These temporary protections include Temporary Protective Status (TPS)* or Deferred Action for Childhood Arrivals (DACA)**. We want to encourage programs to strengthen the holistic support provided to undocumented students pursuing dentistry programs at their institutions.

This information is intended for decision-makers and leaders who influence dentistry programs and advisors who support students at different levels of their educational journey. Pre-Health Dreamers (PHD) encourages fair consideration of prospective dental students living with various immigration circumstances in the US. Upon review of applications, you are sure to find that students with immigrant backgrounds, especially undocumented students, have a wide breadth of life experiences, cultural agility, linguistic expertise, unique perspectives, and a desire to train in underserved areas.¹ Each individual has overcome significant obstacles as they pursue higher education. They are persistent and passionate in their educational attainment despite substantial odds. Many students with and without DACA or TPS have been enrolling in professional programs nationwide for the last decade. Pre-Health Dreamers, along with our community and network, hope that dentistry programs become welcoming to strong program candidates, applicants, and prospective students regardless of their immigration status.

These students' experiences can enrich the diversity in the classroom. Subsequently, matriculating students with different immigration backgrounds can enhance patients' diversity when seeking dental care. Lastly, individuals with DACA, TPS, and those without a Social Security Number can help meet the rising demand for a diverse healthcare workforce.

Sincerely,

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* Temporary Protective Status (TPS): The Secretary of Homeland Security may designate a foreign country for TPS due to conditions in the country that temporarily prevent the country's nationals from returning safely, or in certain circumstances, where the country is unable to handle the return of its nationals adequately. USCIS may grant TPS to eligible nationals of certain countries (or parts of countries), who are already in the United States.

** Deferred Action for Childhood Arrivals (DACA): On June 15, 2012, the secretary of Homeland Security announced that certain people who came to the United States as children and meet several guidelines may request consideration of deferred action for a period of two years, subject to renewal. They are also eligible for work authorization.

How Dentistry Programs Can Support Undocumented Students

- Financial aid assistance provided for students who are DACA and TPS recipients and students without an SSN is limited. If institutional aid for students does not have federal restrictions, schools can assess and determine if the assistance can become available to undocumented students by removing the US citizenship requirement.
- More and more institutions are seeking creative ways to help undocumented students finance their dentistry, nursing, and medicine programs, including tuition, room and board, books, emergency grants, and funding for DACA renewal.
- Working with students to secure financial aid assistance, legal counseling, mental health services, and holistic counseling should be prioritized.
- Since clinical training is unpaid, students should onboard and complete their clinical hours. Institutions are encouraged to create partnerships that welcome all students.
- Sites that host dental school students for clinical training can establish welcoming processes to support the onboarding of undocumented students.
- Provisions in the Civil Rights Act and the Immigration Reform and Control Act prohibit employers from discriminating based on national origin or, in some cases, citizenship status, thereby providing opportunities for DACA and TPS recipients seeking employment.
- DACA and TPS recipients can be treated like other candidates as they have the necessary documentation and information for the Form I-9 Employment Eligibility Verification (valid Employment Authorization).
- Various states have adopted policies and regulations to affirmatively allow DACA, TPS, and ITIN* holders who meet all professional requirements to receive a professional license.
- Students who cannot apply for a professional license in their home state or institution due to legislation can research and apply for their license in other states that provide professional licenses to individuals with an ITIN.

*Individual Tax Identification Number (ITIN) - Individuals without a social security number may have an ITIN (Individual Tax Identification Number). ITINs, provided by the Internal Revenue Service (IRS), are identifying numbers individuals with or without status can use to file taxes, get background checks, attain a professional license, and apply for credit cards or loans.

2022 Guidance for Dentistry Programs

1) Undocumented Students and Dental School

At this time, a list of dental schools accessible to DACA, TPS, or non-SSN individuals is not available. Some schools have previously admitted a DACA recipient or a TPS recipient; however, a record of the support they received from the institutions is not readily available. It is also unclear if these campuses provided the guidance, support, and opportunities needed to graduate for students who are undocumented.

Medical schools have already made strides for students who are undocumented and in health professional programs. Based on the AAMC tool, an estimated 117 out of 155² medical schools accept applications from DACA recipients. However, the same information is unknown for individuals with TPS and individuals without an SSN.

Based on the information above, we estimate that the percentage of DACA recipients enrolling in dental school and receiving substantial support is lower than in medical school. One reason is that the rate of DACA recipients seeking dental school is lower; the second reason is that compared to medical schools, dental schools have less experience in creating resources and support for DACA recipients or students without social security numbers because they have not yet admitted a student under these circumstances or have sought resources for such students.

Many health-related professional programs, like dental school, admit their first undocumented student only to find that they lack the resources to best support their student. It is in the best interest of the student and campus to prepare early. A task force composed of “undocumented friendly” staff, faculty, and administrators will be beneficial to support resource building. Pre-Health Dreamers has worked with schools and students who are initially overwhelmed, which is why we highly encourage students to research and contact potential schools early (before applying) to establish connections with the admission and financial aid office regarding the resources and support they will need. This way, if the school does not yet have those resources, solution-oriented conversations with program decision-makers can get started that result in new resources for future undocumented students.

Having no history of matriculating an undocumented student should not be a reason to dissuade or discourage undocumented students from applying to dental school and pursuing a career in dentistry.

2) Funding

We have found that undocumented students have difficulty navigating the financial aid system. PHD recommends that institutions create partnerships with donors to prepare and create financial assistance for undocumented students entering their programs in the future. We also ask that programs assess their institutional and private aid to determine if these funds can be accessible to students with DACA, TPS, or without a social security number.

Campus staff is encouraged to inquire with campus decision-makers to remove the US Citizenship requirement from institutional aid and scholarships. For example, US Citizenship requirements may prohibit non-citizens from applying for institutional assistance and scholarships even when funding does not come from the federal

government and the institution or private funders. In that case, we encourage schools to update institutional aid and scholarship requirements to be inclusive and establish additional non-federal funding at their campus, to be accessible to all students regardless of their immigration status. An initiative of simply removing the US Citizenship or Permanent Resident Requirement from non-federal funds can create an equitable financial aid process for all students.

3) Residency after dental school for individuals with DACA and TPS

Individuals with DACA and TPS have employment authorization, and a social security number (SSN) and thus can apply to residency programs after dental school.³ Unlike in medicine, residency is not a requirement for dentists; however, it is highly recommended. Dentists can apply for residency programs at any point in their careers after receiving their license. Due to circumstances or changes in immigration processes, some individuals may be provided with the opportunity to apply for a change in immigration status, changing their employment opportunities after graduation.

There are various types of residencies available, such as a General Practice Residency (GPR), which tends to be hospital-based, or Advanced Education in General Dentistry (AEGD), which enhances the practitioner's skills. Typically GPRs will be surgery-oriented, but this is not always. If a candidate wants to specialize, they will pursue a specialty residency such as Orthodontics, Prosthodontics, Periodontics, etc. Residencies can be completed at hospitals, research labs, and other institutions. Residencies can be paid, and each site has its onboarding process. Some, including the specialty residencies, may have tuition attached to them. In addition, some specialties will include a master's degree or MD in the case of oral surgery. As DACA and TPS recipients, some facilities may assume that students cannot complete their residency; some states may also create barriers for them. However, these individuals with DACA or TPS have a valid social security number and authorization to work.

We recommend advisors encourage students to research early to ensure they give themselves options and enough time to navigate possible complex situations. It is also vital that students learn about state policies regarding professional licenses for DACA and TPS recipients and individuals with an Individual Taxpayer Identification Number (ITIN).

4) Pursuing dental school without a Social Security Number (SSN)

To register for the Dental Admission Test (DAT), applicants need only one government-issued I.D. with a photograph and signature (e.g., driver's license and passport) and one I.D. with a signature (social security card, credit cards, library cards, and others meet this requirement).

- If students do not have a government I.D., they can get a valid, unexpired passport from their consulate* in the United States.

*Consulates provide the same services and carry out the same official functions [in the US] for individuals from other countries [in an] Embassy. Consulates provide passports, birth registration, and many other services for visiting or resident citizens [from a different] country while in the US. They also have consular sections which issue visas for foreign citizens to visit, study and work in the United States.

<https://diplomacy.state.gov/diplomacy/what-is-a-u-s-consulate/>

- Advice students to use the name as it appears on their official government-issued identification, such as a driver's license or passport. When they arrive at the test center, the name on the I.D.s must match exactly the name on their application, or they will be denied admission to the test.
- As of 2021, prospective applicants must be a US Citizen or Permanent Resident to apply for the fee waiver.⁴
- Keep in mind testing fees are non-refundable and non-transferable. There are no exceptions. Your credit or debit card will be charged when you submit your application.
- has not been added for applicants without an SSN.
- As residency is not a requirement for dental school students, it's essential to answer students' questions about clinical readiness post-graduation. While some institutions say residency is strongly recommended, others may say it is not. Ultimately, it's the applicant's decision when they finish their DDS (Doctor of Dental Surgery) or DMD (Doctor of Dental Medicine) program.
- The DDS/DMD degree earned in dental school meets the licensing requirement for practicing general dentistry, so undocumented students are qualified to begin working after graduation.

5) State Residency for Tuition Purposes vs International Student Coding

Currently, many institutions are working towards strategizing best practices that will help support undocumented students. An obstacle is that many students with these immigration statuses are coded as international students, especially students attending schools outside of California. Through our experience working with students, we find that being coded as an "International student"* can create additional obstacles while seeking financial resources. We encourage schools to treat undocumented students similar to "Domestic students"**, especially regarding admission and financial aid. By doing this, institutions minimize the barriers for students when applying for financial assistance or scholarships. Additionally, coding students as "International" may sway students away from using available resources.

* International students are defined as "non-immigrant" visitors who come to the United States temporarily to take classes or take online courses virtually from anywhere in the world. <https://summer.berkeley.edu/international/are-you-an-international-student>

**Domestic students are American citizens, naturalized U.S. citizens, permanent residents, refugees, or asylees. https://www.wichita.edu/admissions/international/current_students/student_types.php

2022 Policy Updates Regarding DACA and TPS

(Additional information regarding DACA and TPS can be found on page 5)

Deferred Action for Childhood Arrivals (DACA)

Deferred Action for Childhood Arrivals (DACA) is a federal, executive branch initiative announced by former President Obama in June 2012 for specific individuals who are undocumented and who came to the U.S. as children. DACA has afforded many individuals new opportunities by providing access to work authorization, a social security number, and a reprieve from deportation.

On September 5, 2017, the Trump Administration announced that it would terminate DACA by halting the review of initial applications and a wind-down process for existing DACA recipients. Soon after the 2017 announcement,

multiple lawsuits were filed across the country that challenged the Trump Administration's actions to terminate DACA. The current administration argued that DACA is an unlawful immigration policy signed by President Obama, who did not have the authority to create the program.

On June 18, 2020, the Supreme Court issued a decision finding that the Trump administration's termination of DACA violated federal law. The DACA program was reinstated to its initial benefits meaning that DACA beneficiaries can renew their DACA every two years, granting them deferred action from deportation and employment authorization. This employment authorization is not contingent on employer sponsorship.

At this moment, first-time applications for DACA are not being accepted. Pre-Health Dreamers, colleges, and universities have seen a rise in new students without status. However, regardless of setbacks, we have continuously seen progressive changes throughout the years. We encourage advisors and schools to work with students and prepare them for income-generating options as health professionals with complex immigration statuses (i.e., private practice, independent contracting, etc.). We encourage programs to support the students throughout their journey and connect them with resources that will allow them to reach their full potential.

For up-to-date information on DACA, please visit the National Immigration Law Center

<https://www.nilc.org/issues/daca/>.

Temporary Protective Status (TPS)

"Temporary Protected Status, or TPS, is an immigration status that allows foreign nationals to remain in the U.S. if during the time they were in the U.S. something catastrophic happened in their country of origin preventing their safe return – for example, war, famine, natural disaster, or epidemic. TPS allows people to work legally and be protected from deportation."⁵

Many staff, administrators, and faculty do not understand the complexity of TPS and often deny students the same admission access, advising, support and assistance that they do DACA recipients. Less information and resources exist that guide educators in working with TPS recipients students. We highly recommend that institutions work

with TPS recipients as they would DACA recipients due to similar procedural and processing steps that may occur when matriculating and ensuring resources for students under these categories. We also recommend that schools use coding that keeps the students' undocumented status confidential (ex., Resident for campus purposes only, CITZ undetermined, etc.)

In California, DACA and TPS recipients and students without an SSN can apply for state financial aid through the CA Dream Act application for undergraduate and graduate programs. Students with TPS should be treated like other applicants who meet the requirements for the programs.

Like DACA, students under TPS have faced some uncertainty. In the last few years and based on the country, TPS has been canceled and sometimes extended or reinstated for individuals from specific countries such as Haiti, Guinea, and Sierra Leone.⁶ Advocates continue to fight for an extension for these individuals when TPS is in the balance.

How do these announcements impact current DACA and TPS students?

Individuals with DACA and TPS continue to have access to all the benefits the program confers (access to a social security number, employment authorization document, and protected status in the U.S), allowing individuals to continue working and furthering their education. We strongly recommend that dental school programs continue to consider applicants with DACA, TPS, and without SSN, as they would any other applicant, and help educate their staff and other stakeholders that the programs are still in effect.

Any uncertainties with DACA and TPS should not discourage programs from supporting their current and prospective students who are undocumented. Individuals have worked hard for many years and have overcome significant challenges to reach this point in their educational journeys, and they deserve the chance to continue their education.

Furthermore, regardless of the outcome for any of these immigration situations, recipients may have the opportunity to change their immigration status during dental school or soon after. According to a national study by Professor Tom Wong at the University of California, San Diego, an estimated 14.3 percent of DACA-eligible youth surveyed were eligible for another form of immigration relief, including eligibility for U nonimmigrant status for survivors of certain crimes or eligibility for lawful permanent residence through a family-based visa petition.⁷ As an example from other students, over a dozen medical students with DACA have adjusted their immigration status while in medical school in the past five years. Based on this data, we can ensure that some students in dental school, with DACA and TPS and without SSN, can also have the same outcomes in the coming years when it comes to their status.

In addition, advocates continue to lobby for a pathway to residency for these individuals. An overwhelming majority of Americans support protecting and granting a change in status for undocumented youth.⁸ The Dream Act or other immigration legislation could permanently protect these individuals in the future.

Summary of Support Geared Toward Students with DACA, TPS, and Without SSN:

- Pre-Health Dreamers and partners are researching and advocating for several professional programs to create accessibility for students with different immigration situations.
- The medical community has been actively supporting undocumented students with DACA. The Association of American Medical Colleges (AAMC) led an amicus brief, collaborating with other health professions groups, supporting the DACA litigation before the Supreme Court.⁹
- Though rare, dental school programs have admitted DACA and TPS recipients and students without an SSN. The ADEA has added language and resources to its website. Search "ADEA DACA" for possible additional resources.
- Schools have accepted applicants with DACA and have realized the importance of establishing generous financial aid and holistic support for students.
- Dental school programs are not likely to provide generous institutional aid or institutional loans. Students have been offered assistance, but many are in the low thousands for high tuition fees.
- Institutions are encouraged to code students as in-state tuition to minimize undocumented individuals' obstacles when seeking financial aid support, including scholarships.
- Encourage schools to connect with funders who can help provide generous scholarships for students who do not qualify for federal, state, or institutional aid due to their immigration status.
- Educators have started to get informed on income-generating options for their graduates without social security numbers and have found many options available.
- Schools should assess their institution. They can use [Pre-Health Dreamers' 2020-2021 Developing an UndocuSupport System: Enrichment Assessment of Campus Support for Undocumented Students](#).
- Encourage schools to create an Undocumented Student Taskforce to assess and create the resources necessary for undocumented students.
- Schools should provide a point of contact with experience working with undocumented students.

Last word

While an estimated 10.5 million undocumented immigrants reside in the U.S., we have witnessed the lack of training and hands-on resources for trainees and current healthcare professionals to serve their undocumented patients adequately. The lack of equitable healthcare access and care for undocumented and immigrant community members can be enhanced by individuals who are empathetic to the vulnerable situations and unique needs of these communities.

We believe future health professionals from undocumented and immigrant backgrounds have invaluable experiences caring for this diverse immigrant and underserved population. Immigrant students often lead advocacy efforts around healthcare access for undocumented and immigrant patients and identify health coverage resources for undocumented individuals, individuals like their families. Undocumented students can become knowledgeable healthcare professionals that will better serve and connect with the communities from which they come.

By providing support and advocacy for qualified undocumented individuals pursuing careers in the health professions, you can help close the gap in holistic support for these individuals within higher education institutions. Through academic support, guidance, and networking opportunities, you can help equip undocumented students for success in educational programs.

Continuing to open doors for undocumented students will make for a more equitable health care system and culturally aware professional world.

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**PRE-HEALTH
DREAMERS**

Pre-Health Dreamers (PHD) promotes equitable education and healthcare access, opportunities, and resources for undocumented individuals and all immigrant communities. For more information visit: www.phdreamers.org.

Appendix A:

ADEA - Citizenship Information

United States Citizenship Details

When selecting Citizenship status on the ADEA application, [DACA, TPS and individuals without an SSN] should consider the following definitions which are adapted from the US State Department:

- Temporary US Resident: an individual who is an [alien](#) – a nonimmigrant foreign national – who is approved to [temporarily live](#) in the US for a specific purpose (e.g., as a student), has a permanent residence abroad, and does not hold a Green Card.
- None: an individual who has no US citizenship or visa (immigrant or nonimmigrant) status.
- **Example below is for individuals from Mexico without an Employment Authorization Card; Pre-Health Dreamers recommends you contact ADEA to verify which answer is best based on your scenario.**

The screenshot shows the ADEA application interface for the 'Citizenship Information' section. The top navigation bar includes 'My Application' and 'Add Program'. The ADEA logo is in the top left. A progress indicator shows '0/8 Sections Completed'. The left sidebar contains navigation links: Release Statement, Biographic Information, Contact Information, Citizenship Information (selected), Environmental Factors, Parent/Guardian, Race & Ethnicity, and Other Information. The main content area is titled 'Citizenship Information' and includes instructions: 'Enter your citizenship information in this section. Visit the [Applicant Help Center](#) for more information. If you are not a US citizen, you can edit this section after you submit your application.' A note indicates '* Indicates required field'. The form is divided into several sections: 'United States Citizenship Details' with fields for U.S. Citizenship Status (None), Country of Citizenship (Mexico), and a radio button for dual citizenship (No selected); 'Canadian Citizenship Details' with a field for Canadian Citizenship Status (No Status); 'Residency Information' with fields for Legal State of Residence (California), Legal County of Residence (Los Angeles County), and two questions about residency duration (both 'More than 10 years'); 'Visa Information' with a radio button for U.S. Visa (No selected); and 'Deferred Action for Childhood Arrivals (DACA)' with a radio button for application status (No selected). A 'Save and Continue' button is at the bottom.

ADEA THE VOICE OF DENTAL EDUCATION

My Application Add Program

Citizenship Information

Enter your citizenship information in this section. Visit the [Applicant Help Center](#) for more information. If you are not a US citizen, you can edit this section after you submit your application.

* Indicates required field

0/8 Sections Completed

Release Statement

Biographic Information

Contact Information

Citizenship Information

Environmental Factors

Parent/Guardian

Race & Ethnicity

Other Information

United States Citizenship Details

* U.S. Citizenship Status

* Country of Citizenship

* Do you have dual citizenship?

Yes No

Canadian Citizenship Details

* Canadian Citizenship Status

Residency Information

* Legal State of Residence

* Legal County of Residence

* How long have you been a resident of your state?

* How long have you lived in the U.S.?

Visa Information

* Do you have a U.S. Visa?

Yes No

Deferred Action for Childhood Arrivals (DACA)

Have you applied for and been accepted to DACA?

Yes No

Appendix B:

University of California System

<https://www.universityofcalifornia.edu/press-room/statement-uc-president-janet-napolitano-filing-supreme-court-brief-daca>

American Council on Education (letter includes 600 university leaders)

Link: <https://www.acenet.edu/Documents/Institutional-DACA-Letter-to-Congress.pdf>

One Way Maryland Can Better Support Undocumented Students in Higher Education

<https://www.newamerica.org/education-policy/edcentral/md-support-undocumented-students-in-highered/>

Icahn School of Medicine at Mount Sinai, Yale Law and Yale School of Medicine NYT Op-Ed

<https://www.nytimes.com/2020/04/02/opinion/trump-coronavirus-daca.html>

Association of Jesuit Colleges and Universities

<https://www.ajcunet.edu/press-releases-blog/2017/9/5/ajcu-statement-on-daca-rescission>

US Companies Supporting DACA Recipients

<https://www.cNBC.com/2019/10/04/major-companies-tell-supreme-court-ending-daca-will-hurt-the-economy.html>

A “Dreamer” in dentistry: Practicing as a DACA recipient

<https://digitaleditions.walsworth.com/publication/?m=44499&i=690763&p=10&ver=html5>

School of Dentistry Admits First 'Dreamers'

<https://dentistry.ucsf.edu/about/news/school-dentistry-admits-first-dreamers>

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<https://www.pewresearch.org/fact-tank/2020/06/17/americans-broadly-support-legal-stat-us-for-immigrants-brought-to-the-u-s-illegally-as-children/>
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