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RE: CIP Code Nominations of Public Health for the DHS STEM Designated Degree Program

The Board of Directors of the Association of Schools and Programs of Public Health (ASPPH), on behalf of more than 140 schools and programs of public health, representing over 11,000 faculty and over 81,000 students, requests Department of Homeland Security consider Public Health, General, 51.2201, as a STEM discipline. Public Health has been a STEM focused discipline since its inception. In its original founding document, the 1915 Welch-Rose Report, public health was described as “an independent science” taught with laboratory and field courses, where “the science is advanced by research” taught in schools with “scientific investigators.”

Description of how the field of study under this CIP code engages students in research, innovation or development of new technologies using engineering, mathematics, computer science or natural sciences (including physical, biological and agricultural sciences).

Description of Public Health, General CIP 51.2201 A program that generally prepares individuals to plan, manage, and evaluate public health care services; to function as public health professionals in public agencies, the private sector, and other settings; and to provide leadership in the field of public health. Includes instruction in epidemiology, biostatistics, public health principles, preventive medicine, health policy and regulations, health care services and related administrative functions, public health law enforcement, health economics and budgeting, public communications, and professional standards and ethics.
Public health, as an academic discipline today, mandates all students gain knowledge in core areas, which are clearly identified by DHS as STEM disciplines, including biostatistics, epidemiology, social and behavioral science, and environmental health. Public health itself is defined by the CDC Foundation as “the science of protecting and improving the health of people and their communities.” (https://www.cdcfoundation.org/what-public-health). We believe that as a discipline that has a core curriculum based on quantitative, biological, and research sciences, public health must be considered a STEM discipline.

All schools and programs of public health are required to teach students several core scientific topics and require coursework (as outlined in the accreditation requirements for the Council on Education in Public Health, or CEPH, here https://media.ceph.org/documents/D2_guidance.pdf and Foundational Knowledge on page 18 of https://media.ceph.org/documents/2021.Criteria.pdf) including.

- **The core areas of all public health degrees** (including 51.2201 and all other degrees in the 51.22 series) include the traditional public health core knowledge areas, defined as biostatistics (inclusive of concepts in DHS-designated STEM discipline of Biostatistics, CIP 26.1102), epidemiology (inclusive of concepts in DHS-designated STEM Epidemiology, CIP 26.1309), social and behavioral sciences (inclusive of concepts in DHS-designated STEM Behavioral Sciences, CIP 30.1701), health services administration, and environmental health sciences (inclusive of concepts in DHS-designated STEM Environmental Health, CIP 51.2202). Public Health students must also study:
  - Mathematical and statistical sciences of biostatistics and epidemiology
  - Biological Sciences
  - Environmental health
  - Research design and data collection
  - Research application
  - Research-based program evaluation
  - Systems thinking
  - Applied Analytics
  - Social and behavioral sciences

DHS should update its standard and include Public Health, 51.2201 as a STEM discipline. The timing is critical to the field, as Public Health Schools are changing their CIP codes to attain STEM status.

Designating 51.2201 as a STEM discipline would permit health departments and other organizations the opportunity to contribute to the education and practical skills development of a larger number of talented public health graduates while helping alleviate a significant workforce shortage and threat to the nation’s health and security. As ASPPH noted in a recent statement, “findings of a study on governmental public health workforce retention in the US, detailed in a recent Health Affairs article, found that public health professionals are leaving their positions at State and local health departments and other governmental agencies at an astonishing rate.” It would also allow an increased number of public health graduates from around the world to contribute to the nation’s health by enrolling in public health degree programs.
and working for an additional period of time through expanded STEM OPT. We welcome dialogue to discuss this request.

Sincerely,

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