



April 30, 2025

The Honorable Kristi Noem
Secretary
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave SE
Washington, DC 20528

Dear Secretary Noem:

On behalf of LeadingAge and the mission-driven aging services providers we represent across the country, I write to urge the Department of Homeland Security (DHS) to reconsider its recent decisions to terminate the categorical parole programs for Cubans, Haitians, Nicaraguans and Venezuelans (CHNV), partially vacate the 2024 Haiti Temporary Protected Status (TPS) extension, and terminate the 2023 TPS designation of Venezuela.¹

LeadingAge represents more than 5,400 nonprofit aging services providers and other mission-driven organizations serving older adults that touch millions of lives every day. Alongside our members and 36 partners in 41 states, we use advocacy, education, applied research, and community-building to make America a better place to grow old. Our membership encompasses the entire continuum of aging services, including skilled nursing, assisted living, memory care, affordable housing, retirement communities, adult day programs, community-based services, hospice, and home-based care. We bring together the most inventive minds in the field to lead and innovate solutions that support older adults wherever they call home.

In the aging services field, the stakes could not be higher. Workforce shortages contribute to the stark reality that the U.S. is currently struggling to meet the demand for long-term services and supports among the nation's older population. Workforce shortages plague our members, many of whom continuously face difficult choices about whether they can maintain admissions or deliver consistent services due to a lack of available staff. At the same time, census data tells us the number of adults aged 65 or older will increase from 58 million in 2022 to 83 million in 2050.² Absent significant policy intervention, we can be certain today's workforce shortage will intensify as the gap between need and capacity widens with each passing year.

Foreign-born workers with legal status, including parolees and TPS holders from Haiti and Venezuela, play a meaningful role in stabilizing this fragile workforce. Across the country, they serve as certified nursing

¹ Termination of Parole Processes for Cubans, Haitians, Nicaraguans, and Venezuelans, 90 Fed. Reg. 13611 (3/25/2025); Partial Vacatur of 2024 Temporary Protected Status Decision for Haiti, 90 Fed. Reg. 10511 (2/24/2025); Termination of the October 3, 2023 Designation of Venezuela for Temporary Protected Status, 90 Fed. Reg. 9040 (2/05/2025).

² US Census Bureau. (2023, October 31). 2023 National Population Projections Tables: Main Series. Census.gov. <https://www.census.gov/data/tables/2023/demo/popproj/2023-summary-tables.html>

assistants, home health aides, licensed practical nurses, and other direct care workers — the very people who provide daily, hands-on support to our country's older adults. Their contributions are essential, not just to our care infrastructure, but to the health, dignity, and independence of America's aging population.

Your agency's decisions to terminate the temporary parole for all CHNV individuals and roll back TPS designations for Haiti and Venezuela have created immediate uncertainty and concern for employers and workers alike. Without these statuses and associated employment authorization, parolees and TPS holders will immediately lose their ability to legally work and many of our members will lose deeply valued, experienced staff at a time when replacement workers are exceedingly difficult to find. This is not a future concern — this is an April 2025 concern.

One LeadingAge member, a senior living community in South Florida, expects to lose 35 valued members of its staff if the above actions take effect. This includes highly skilled and difficult to replace staff members such as certified nursing assistants and dietary aides. Moreover, the community anticipates broader consequences that may not be immediately apparent. Staff members who are not directly affected may still experience disruptions due to the impact on family or close friends, complicating their ability to remain in their roles.

We hear similar concerns from members nationwide. A skilled nursing community on the East Coast, serving more than 300 residents, relies heavily on foreign-born workers, including individuals with temporary status. If these statuses are terminated, the provider will lose several certified nursing assistants — all exceptional employees with strong performance records. In Pennsylvania, one provider will no longer be able to employ approximately 30 Haitian employees. A faith-based provider in Virginia estimates that 60 of its staff members rely on TPS or parole for obtaining work authorization. These stories are not isolated — LeadingAge members across states such as New York, Wisconsin, Minnesota, and South Carolina are facing similar risks.

Beyond concern for employees, an element of the impact that worries our providers focuses on residents — the older adults at the heart of aging services. Unlike other sectors that depend heavily on foreign-born workers, the aging services field requires continuity, consistency, and trust between direct care workers and those they serve. Longstanding relationships with staff contribute directly to residents' emotional well-being and sense of security. Some of the affected employees have been in their roles for a decade or more. As caregivers they are trusted companions and vital members of the community. The sudden loss of these individuals risks unsettling care routines, diminishing quality of care, and causing distress among residents who depend on familiar, stable support in their daily lives.

We understand that decisions relating to these programs involve complex considerations about what is in the U.S. national interest, and we appreciate your broad discretion to make those determinations. We simply ask that you consider the above stories, which we believe are generally illustrative of individuals in the impacted groups. These are hardworking, taxpaying individuals who have dutifully obtained the necessary documentation to serve in vital roles in the U.S. workforce, including difficult to fill positions in the strained aging services sector. We request that you not overlook the meaningful economic contribution they make to their communities and our country.

In consideration of the above, we respectfully urge DHS to (1) allow individuals paroled under the CHNV program to remain in the United States for the duration of their authorized parole periods; (2) restore the

previously established expiration dates for Haiti's 2024 TPS extension and Venezuela's 2023 TPS designation; (3) extend these designations beyond those dates in recognition of the vital role these individuals play in our economy, which is solidly in our national interest; and (4) commit to exploring more permanent immigration pathways for these essential workers in partnership with stakeholders like LeadingAge and with members of Congress. These actions would provide critical stability to aging services providers, ensure continuity of care for older adults, and give employers and employees time to plan for the future amidst a national workforce crisis.

Thank you for your consideration of this urgent matter. We would welcome the opportunity to share data or stories from our members about the importance of TPS holders to the aging services workforce.

Sincerely,

A handwritten signature in black ink that reads "Katie Smith Sloan". The signature is written in a cursive, flowing style.

Katie Smith Sloan
President and CEO