

June 24, 2025

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

Dear Secretary Noem:

On behalf of the American Seniors Housing Association (ASHA) and Argentum, trade associations that represent owners, operators, developers and financiers of senior living communities across the country, I write to express our deep concerns regarding the Administration's recent actions to terminate humanitarian programs, such as the Cuba, Haiti, Nicaragua and Venezuela (CHNV), Temporary Protected Status (TPS) for Venezuelans and Haitians, and other programs that are currently providing parolees the ability to live and work in the United States. *With the sudden termination of these programs, essential senior living workers are receiving notices to immediately leave their workplace and to self deport. Given the current workforce shortage in senior living, this poses a danger to our residents who rely on these caregivers and other essential workers. Therefore, a one-year delay is urgently requested to allow our communities to appropriately respond to these abrupt changes*

- **We seek relief for senior living and other long term care workers who have been granted humanitarian parole and are now at risk of deportation.** I call to your attention to those who have chosen to work in senior living and the broader long-term care industry, caring for our nation's older adults including many of our nation's veterans. The work they do is crucial. Without a stable and adequate workforce of caregivers, nurse assistants, medication technicians, housekeepers, servers, and the many more essential workers who provide care for our aging population, this work would be impossible. Yesterday they cared for our mothers, fathers, grandparents and other loved ones and today, they have been requested to leave the country. This presents real consequences for our caregiving communities that must now figure out how to replace these workers at a time when the workforce shortage continues to challenge the industry. By extending the legal status of those subject to these program terminations for at least one year, it will allow our providers adequate time to transition in order to minimize serious disruption to the residents.

Please note, our members are vigilant in vetting new hires utilizing criminal background checks and collecting required documents to evidence their legal authority to work in the United States. These workers are not undocumented but rather have been legally paroled into this country on a temporary basis and have been granted worker authorization. To

remove them at a time when the long-term care industry is facing significant workforce shortages will be destabilizing.

Considering these current and future challenges, we respectfully request that you take immediate action to recognize these essential workers for the important and necessary work they do and grant a delay of enforcement of at least one year. We base this request on the following:

- **The current workforce shortage in the long-term care industry makes it extremely difficult to replace qualified and reliable workers, especially with limited notice.**

There are simply not enough U.S. workers seeking employment in this sector. These are difficult jobs but very rewarding and meaningful. They are best suited for those with a passion for serving older Americans. Without these caregivers, our seniors will suffer. The dedicated caregivers who work in our senior living communities are the unsung heroes of the American workforce.

This is a growing concern as we seek to solve the need for tomorrow's workforce, but importantly, this is a problem we must address today. It is estimated that 25-30% of the long-term care workforce is currently filled by foreign born people who have immigrated to this country. We are grateful for the compassion they show to our residents and the meaningful bonds they create within our communities, which enrich resident lives in so many ways.

The demand projections for long-term care workers in all settings (assisted living, nursing homes, home health care) is astonishing. An estimated 4.6 million paid direct caregivers are working today in home care, residential care homes such as assisted living, and nursing homes. Between 2022 and 2032, there will be an estimated 8.9 million job openings in direct care positions. This does not include the housekeepers, dining staff, groundskeepers, maintenance and other important positions the industry employs that are also in high demand. This data coupled with the current shortage and projected need for workers to meet this need, should elicit a call to action for policymakers and industry alike.

- **There is currently no worker visa program suitable to the needs of the long-term care workforce, like those available to other industries, such as agriculture, hospitality, highly skilled workers and others.**

There are numerous nonimmigrant visa categories for people traveling and working in the U.S. but none of them are suited for the caregiver, dietary aid, med tech and other critical positions in the long-term care industry. Until we can address this deficiency through immigration reform legislation, these humanitarian programs have been extremely helpful in filling that void in the system. These workers should be given the opportunity to have a career, earn a good living and make a difference in their own lives and the lives of others, which they do every day.

- **The aging population demands a stable and compassionate workforce.**

The demand for senior living and other long-term care supports and services will skyrocket in just a few years. Without an adequate pipeline of workers to meet this demand, the care options will be limited, and our older adults will be at risk.

By 2040, over one in five people in the country will be 65 or older. We are a rapidly aging population; advances in medicine and technology are allowing people to live longer. The number of 85-year-olds will more than double from 6.5 million in 2022 to 13.7 million by 2040. Additionally, over 7 million Americans are living with Alzheimer's disease and other age-related forms of dementia. By 2050, this number is projected to rise to nearly 13 million. It is imperative that we prepare for this demand and enact meaningful changes to our immigration laws to create legal pathways for foreign born workers who can fill these essential positions.

- **Senior living plays a significant role in the greater healthcare system.**

Our workers are key to maintaining the health and wellbeing of the residents they serve, thereby reducing the need for more critical services or hospitalization. When residents of senior living are well cared for, the overall healthcare system benefits. It would be a disservice to our residents who are frail and in need of supportive services, to terminate the programs that have helped to supply our long-term care workforce.

Please consider this request for a delay in these program terminations. There are hundreds of thousands of foreign-born immigrants today lawfully living and working here in the U.S. that are making a difference in the senior living workforce. Without care providers and other front-line staff, the U.S. cannot meet the growing needs of our rapidly aging population. We look forward to working with you on this critically important issue.

Thank you for your consideration.

Sincerely,



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**About ASHA:** ASHA is a national organization of over 500 senior living companies who own, operate or provide services to approximately 7,000 senior living communities across the U.S., including active adult, independent living, assisted living, memory care and life plan/continuing care retirement communities. Our members' communities serve a wide range of seniors, from those who require very little assistance with activities of daily living (ADL) such as eating, bathing, and dressing to those with significant needs associated with Alzheimer's disease and related forms of dementia.

**About Argentum:** Argentum is the leading national association exclusively dedicated to supporting companies operating professionally managed, resident-centered senior living communities and the older adults and families they serve. Argentum member companies operate senior living communities offering assisted living, independent living, continuing care, and memory care services to older adults and their families. Since 1990, Argentum has advocated for choice, independence, dignity, and quality of life for all older adults.