



Dear Members,

We are sharing these updates on immigration and workforce policy from our national association, Argentum, as it may be relevant to you.



Temporary Protected Status for Haitians Ends Friday, July 10

Following the U.S. Supreme Court decision in [Mullin v. Doe](#) on June 25, U.S. Citizenship and Immigration Services (USCIS) [announced](#) this week that Temporary Protected Status (TPS) for Haitian nationals will terminate effective **July 10, 2026**. As a result, beginning **July 11, 2026**, Employment Authorization Documents (EADs) issued under Haiti TPS (Category A12 or C19) will no longer be valid for employment authorization purposes.

TPS provides temporary protection from deportation and work authorization to individuals from countries experiencing armed conflict, natural disasters, or other extraordinary conditions. Because TPS designations must be continuously maintained by the Secretary of Homeland Security, the termination of Haiti's TPS designation has immediate implications for employers' I-9 compliance obligations.

To help ensure compliance with federal employment laws, Argentum's counsel recommends that employers take the following steps:

- 1. Identify affected employees.**
2. Review Form I-9 records to identify employees who presented a Haiti TPS-based EAD (Category A12 or C19), including any temporary or agency staff working within your communities.
- 3. Complete reverification by July 10.**
4. Before the expiration date, reverify affected employees' work authorization on Form I-9. Haiti TPS-based EADs may not be accepted as valid employment authorization after July 10. Employees may present any other acceptable documentation establishing their authorization to work if they qualify under another immigration category.
- 5. Remove unauthorized workers from active employment effective July 11.**
6. Employees who cannot provide alternative valid work authorization documentation may not continue working after July 10. Decisions regarding termination, unpaid leave, or other employment actions should be made in consultation with legal counsel and in accordance with company policies.
- 7. Apply procedures consistently.**
8. Any employment action should be based solely on work authorization requirements and expiration dates—not on an employee's nationality or immigration background. Employers should follow the same reverification process for all affected employees to minimize discrimination and document-abuse risks.
- 9. Communicate carefully and respectfully.**
10. Provide affected employees with timely notice of the upcoming deadline and encourage them to seek advice from qualified immigration counsel regarding any alternative immigration options that may be available to them.

11. **Continue monitoring federal guidance.**
12. Employers should monitor USCIS and I-9 Central resources for any additional guidance. While legislation to extend Haiti TPS remains pending in Congress, employers should not rely on potential future legislative action when making current I-9 compliance decisions.

Many of you may receive questions from employees who are affected by this development. Argentum's legal counsel advises that employers should exercise caution when discussing individual immigration matters. Rather than providing legal guidance, employers should encourage affected employees to seek advice from their own qualified immigration attorney, who can evaluate their specific circumstances and available options. Employees must provide valid work authorization documentation by the expiration date established by the federal government. If alternative authorization cannot be provided, the employee may no longer be eligible to work and the organization must determine the appropriate employment action consistent with applicable laws and company policy.

We recognize that this development creates uncertainty for affected employees and operational challenges for some providers. Argentum will continue to monitor federal actions and provide members with updates as additional guidance becomes available. If you have any questions, please don't hesitate to reach out to me or Paul Williams at pwilliams@argentum.org.

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Termination of Temporary Protected Status (TPS) For Haitian and Syrian Nationals

Today, the U.S. Supreme Court issued a 6–3 decision ([Mullin v. Doe](#)) permitting the Administration to move forward with terminating Temporary Protected Status (TPS) for nationals of Haiti and Syria. The ruling lifts prior court injunctions and allows the Department of Homeland Security (DHS) to proceed with ending protections that have enabled affected individuals to live and work lawfully in the United States.

TPS provides temporary protection from deportation and work authorization to individuals from countries experiencing armed conflict, natural disasters, or other extraordinary conditions. However, TPS is a temporary benefit and requires continuous designation by the Secretary of Homeland Security.

When Terminations Take Effect

The Supreme Court's decision does not itself establish new termination dates but removes the legal barriers that had paused DHS prior termination actions of TPS. DHS is now expected to issue updated termination notices, including any possible wind-down periods, which can include a defined timeframe before employment authorization expires. However, it is quite possible that DHS does not include any "wind-down" period or timeframe before the affected individuals are considered out of status and without work authorization as a result of DHS' prior termination attempt of TPS for these countries.

At the time of this memo, federal agencies have not yet confirmed updated post-ruling effective dates. Employers should monitor DHS and USCIS announcements closely for definitive timelines on the end of TPS for those nationals affected and their respective employment authorization.

Guidance for Senior Living Employers and Employees

Argentum's legal counsel believes that as the Supreme Court has clearly indicated the termination of TPS benefits for these affected nationalities, it is the responsibility of the company to reverify the employment authorization documentation of all such affected employees. **For now, the Supreme Court decision should be considered determinative and allows for the immediate termination of TPS and its related benefits for Haitian and Syrian nationals.** Companies should seek to reverify the employment authorization of those affected employees once the government has announced the end authorization date for those nationals.

Summary:

- As soon as possible the company should reverify the work authorization for all Haitian and Syrian workers authorized under TPS upon announcement from DHS post-Supreme Court decision. Do not automatically terminate any Haitian or Syrian workers under TPS based on the Supreme Court's announcement alone, as workers may be able to present some other form of valid work authorization to continue employment. If new valid form of work authorization is presented, they can remain employed after termination date.
- Specifically, this means Haitian and Syrian workers who on their Form I-9 presented EAD cards with the category (a)(12) or (c)(19) should be reverified as soon as possible once DHS announcements are made clear.
- The company should continuously monitor DHS announcements regarding TPS and employment authorization end dates for Haitian and Syrian nationals, and seek to reverify those workers once that date becomes clear. See:
 - [Temporary Protected Status Designated Country: Haiti | USCIS](#)
 - [Temporary Protected Status Designated Country: Syria | USCIS](#)
- Managers should continue to follow the expiration date presented by employees on their Form I-9 for any temporary work authorization.
- If an employee is unable to present a valid form of work authorization allowing for employment beyond the listed expiration date, they must then be terminated or placed on unpaid leave, for a defined period (Ex: 30 days).
- If the company utilizes E-Verify, monitor the E-Verify system for any updates with regards to Haitian and Syrian TPS workers which indicate that their status is now terminated. If such a notification is received, company should again follow procedures to request new employment authorization documentation from the employee and terminate if new documents cannot be presented.
- Employees may receive individualized notices from the government noting the termination of their TPS benefits, but this is not guaranteed. Regardless, the Supreme Court has clearly made the announcement that termination is allowed by DHS.

You may be asked by affected employees how they should proceed given the Supreme Court ruling. Our legal counsel advises that employers should be hesitant to provide guidance to employees who are affected by this decision other than that they should seek their own personal immigration counsel that can best advise them on their rights and options. From the company's perspective, once an employee informs you that they are affected by this termination, you should advise them of their need to present new employment authorization documentation by the expiration date announced by the government or that their employment must be terminated (or placed on unpaid leave for a defined period depending on company policy).

If you have any questions, please don't hesitate to reach out to me or Paul Williams at pwilliams@argentum.org.

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If you have any questions, please contact us at Mass-ALA@mass-ala.org.

This update is solely for general informational purposes. It is not intended to replace a full review of the cited regulations or guidance.



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